



VIGIL MECHANISM / WHISTLE BLOWER POLICY

Pursuant to Section 177 of the Companies Act, 2013 and Regulation 22 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Listing Regulations”), the Company has established a vigil mechanism/whistle blower policy for directors and employees to report genuine concerns or grievances about unethical behavior, actual or suspected fraud or violation of the Company’s Code of Conduct or ethics policy and to provide for adequate safeguards against victimisation of employees and directors who avail of the vigil mechanism and also to provide direct access to the Chairperson of the Audit Committee in exceptional cases.

OBJECTIVE & SCOPE

1. This policy covers malpractices and misconducts which have taken place / suspected to have taken place and other matters or activity on account of which the interest of the Company is believed to have been affected.
2. An intimation of concern or misconduct made in good faith may be raised by a director, an employee, or group of employees of the Company, through a written communication under a covering letter signed by the whistle blower which should be submitted in a closed/secured envelope to the Company Secretary of the Company who shall act as vigilance officer to receive such complaints from whistle blower and coordinate with audit committee, who shall oversee the vigil mechanism for disposal of the complaint and inform the whistle blower the results thereof.
3. The identity of the whistle blower shall be kept confidential. Further information as required from the whistle blower may be called for, if required.
4. The concerned director or employee making complain shall have direct access to the Chairperson of the Audit Committee in appropriate or exceptional cases.
5. The Audit Committee may investigate and may at its discretion consider involving any other officer of the company and / or an external agency to carry out investigation and report the outcome of the investigation to the Audit Committee.
6. If an investigation leads to conclude that an improper or unethical act has been committed, the Chairman of the Audit Committee shall report to the Board of directors of the company who will take such disciplinary or corrective action as may deem fit.
7. No unfair treatment will be meted out to a Whistle Blower by virtue of his/her reporting under this policy. The company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers and shall provide necessary protection to the Whistle Blowers.

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8. Anonymous complaints shall not be entertained. The complaint should be supported with specific factual information and should not be on the basis of speculation or interpretation. Any complaint not made in good faith as per opinion of the Audit Committee shall be viewed seriously and the Company may take suitable action against the concerned director or employee including reprimand.
9. The Company reserves its right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever.

REVIEWED AND ADOPTED BY THE BOARD OF DIRECTORS AT THEIR MEETING HELD ON 15TH MAY, 2021.

THIS INFORMATION IS DISPLAYED ON THE WEBSITE OF THE COMPANY IN COMPLIANCE WITH REGULATION 46 OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATION AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015.

CHEVIOT COMPANY LTD.

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