

Name of Document	Human Rights policy
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Group Level/ Sector Level	Mahindra & Mahindra Ltd
Issuing Authority	Ruzbeh Irani President – Group Human Resources Member of the Group Executive Board
Owner of the document	Rajeshwar Tripathi, CHRO-AFS
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1. Introduction:

Respect for Human Rights is a fundamental belief of the organization. We strive to respect and promote human rights, in accordance with the National/International policy frameworks. The organization is committed to upholding human rights guidelines aligned with the ILO mandates and the Universal Declaration of Human Rights (UDHR). We conduct due diligence to identify human rights risks to people in our business.

2. Applicability:

All permanent and contract employees of M&M Ltd., its subsidiaries and Joint Ventures.

3. Community and Stakeholder engagement:

We recognize that we are part of the communities in which we operate. In accordance with the Rise philosophy, our corporate social responsibility (CSR) team engages with communities on human rights that are important to us. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level.

4. Creating an environment free from harassment:

Harassment is any form of behavior that is unwelcome or unsolicited. It is behavior that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, and in the perception of the recipient of the conduct, it should reasonably be considered as having that purpose or effect.

For harassment to occur, there does not have to be an intention to offend or harass. It is the impact of the behavior on the person who is receiving it, together with the nature of behavior, which determines whether it is harassment or not. Mahindra has 'Zero Tolerance' towards harassment of any form, including sexual harassment.

5. Sexual Harassment:

Refer to the detailed Policy on Prevention of Sexual Harassment.

6. Diversity & Inclusion:

The organization has a well-defined and articulated inclusivity charter which shall be the guiding document for all group companies. The organization promotes and supports a diverse workforce at all levels. We believe that diversity and inclusivity (D&I) in the workplace is an instrument of inclusion and empowerment. Towards this, we also ensure that all our policies and practices are compliant and aligned with all applicable laws and regulations specific to diversity and inclusion.

The organization is dedicated to creating a fair and transparent work environment with mutual respect for all. We strive to maintain workplaces that are free from discrimination or harassment based on race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, placement, development, training, compensation, and advancement in the organization is qualifications, performance, skills and experience.

7. Promoting skill upgradation and career development:

All our employees are covered under Capability Building (CB) programs that are relevant to their role in the organization.

We provide training to all employees without differentiation on grounds of gender, age or physical abilities. We also have specialized programs for senior leadership. Our CB team offers a large number of learning offerings and interventions, including training on functional, behavioral and leadership skills for employees and our strategic partners.

8. Safe and healthy workplace:

Protecting the environment and the health and safety of our employees is of prime importance to the organization. The organization implements rigorous plans to ensure the safety and welfare of employees.

We believe in creating awareness of workplace practices and communicating information, instructions and training programs to enable all employees to comply with the Health, Safety and Environment policy of the company.

9. Workplace Security:

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for privacy and dignity. For safety during early and late work hours for women, adequate safe transportation is ensured.

10. Human Dignity:

We are committed to treating those engaged with our organization with dignity and respect. One of our core values is "Dignity of an individual", through which we affirm that we will value individual dignity, uphold the right to express disagreement and respect the time and efforts of others. Through our actions, we nurture fairness, trust and transparency.

11. Communication:

M&M Ltd. communicates all necessary and relevant information with regards to organizational finances, policies and long-term organizational growth with employees. They are also made aware of related laws, guidelines and applicable policies when they join the organization and given periodic reminders during their time in employment.

12. Child Labour & Forced Labour:

M&M Ltd. prohibits child labourers and forced or compulsory labour, including bonded labour, slavery and human trafficking. We prohibit the hiring of individuals that are under 18 years of age.

13. Working times

M&M Ltd. complies with the national legal working time regulations as a minimum requirement. In addition, M&M Ltd. values the employee's resting times, leisure, holidays and a healthy life balance and has made provisions for the same in its policies and benefits which are extended to all its employees.

14. Remuneration

M&M Ltd. remunerates fairly by both internal and external standards. M&M Ltd. pays its employees at least the legal minimum wage applicable in the area concerned.

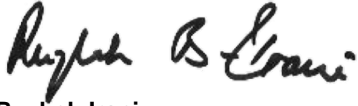
15. Grievance Redressal Mechanism:

The organization implements the above standards by incorporating them into related policies, processes and guidelines across all our business operations. The organization conducts training to strengthen in-house awareness and education on the practice of human rights. The organization believes that an empowered workforce is the best way to receive feedback and identify improvement areas.

M&M's Whistle-blower Policy is a critical means through which stakeholders can raise actual or suspected violations. An ethics helpline managed by an independent agency, is available to raise complaints.

16. Review:

The policy is reviewed at least once a year or as and when there are any changes required.



A handwritten signature in black ink, reading "Ruzbeh B. Irani". The signature is written in a cursive style. A red diagonal line is visible on the left side of the page, partially overlapping the signature.

Ruzbeh Irani
President – Group HR
Member of the Group Executive Board