

14<sup>th</sup> August, 2023

National Stock Exchange of India Limited  
"Exchange Plaza", 5<sup>th</sup> Floor,  
Plot No.C/1, G Block  
Bandra-Kurla Complex  
Bandra (East), Mumbai 400051.

BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.

Bourse de Luxembourg  
Societe de la Bourse de Luxembourg  
Societe Anonyme/R.C.B. 6222,  
B.P. 165, L-2011 Luxembourg.

London Stock Exchange Plc  
10 Paternoster Square  
London EC4M 7LS.

**Sub: Disclosure of Continuing Events/Information as required under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR")**

Pursuant to amendment to Regulation 30 of LODR vide notification dated 14<sup>th</sup> June, 2023, which came into effect from 15<sup>th</sup> July, 2023, the Company is required to disclose any continuing event or information which becomes material upon notification of the said amendment.

Accordingly, the Company in accordance with the requirement of Clause 8 of Para B of Part A of Schedule III of LODR read with Clause 8.1 of the SEBI Circular dated 13<sup>th</sup> July, 2023 is required to disclose pendency of any litigation(s) or dispute(s), the outcome of which can reasonably be expected to have an impact on the listed entity.

Based on the Company's assessment, prevailing law and basis the advice of the counsel in certain matters, the outcome of such pending litigations/disputes is not reasonably expected to have any material financial impact on the Company and hence details of the same are not required to be disclosed. However, the Company is disclosing the details of pending Tax litigations/disputes at High Court and Supreme Court that breach materiality thresholds under LODR as Annexures A and B.

There are other pending tax litigations/disputes which are initiated by/against the Company at different forums viz. Commissioner of Income Tax (Appeals), Income Tax Appellate Tribunal, Maharashtra VAT Tribunal etc. The Company does not reasonably expect any material financial impact on account of these cases also.

Yours faithfully,  
For MAHINDRA & MAHINDRA LIMITED

NARAYAN SHANKAR  
COMPANY SECRETARY  
Encl: a/a

**Annexure A - Litigations Pertaining to Direct Tax**

| Sl. | Name of the opposing party | Court/ Tribunal/ Agency where litigation is filed | Brief details of the dispute/ litigation  | Assessment Year (AY)                 | Expected financial implications, if any, due to compensation, penalty etc*   | Quantum of claims, if any#                     |
|-----|----------------------------|---|---|--------------------------------------|--|--|
| 1   | Income Tax Department      | Supreme Court                                     | <p>The Company has appealed in relation to loans given to subsidiary on which tax department has charged notional interest.</p> <p>The appeal pertains to erstwhile Punjab Tractors Limited which has since been merged into the Company.</p>   | AY 2000-01                           | <p>Nil</p> <p>Rs. 0.07 Crores is disclosed as Contingent Liability in the Financial Statements till 30<sup>th</sup> June, 2023</p>                 | The disputed tax amount is Rs. 0.07 crores.    |
| 2   | Income Tax Department      | High Court of Bombay                              | <p>The Company has appealed in relation to disallowance of expenses as well as differential position taken by the Tax Department w.r.t. taxation of certain incomes. Also, the lower appellate authorities have allowed certain claims in favour of the Company and the Tax department has filed an appeal against such claims.</p> <p>Some of the issues involved are Product development expenses, write off of loans, deduction claimed towards Employee Stock options, disallowances u/s. 14A, tax holiday/ deduction u/s. 80IC, various incentives granted under state incentive schemes, etc.</p> | AY 1990-91, AY 1997-98 to AY 2014-15 | <p>Nil</p> <p>Rs. 488.55 Crores is disclosed as Contingent Liability in the Financial Statements till 30<sup>th</sup> June, 2023</p>               | The disputed tax amount is Rs. 1,226.5 crores. |
| 3   | Income Tax Department      | High Court of Bombay                              | The lower appellate authorities have allowed state government incentives received by the Company favourably by treating the same as capital receipt and the Income Tax department has filed appeals against such claims. The matter pertains to erstwhile Mahindra Vehicle Manufacturers Limited, which has since been merged into the Company.   | AY 2011-12 to AY 2014-15             | <p>Nil</p> <p>Rs. 174.95 Crores is disclosed as Contingent Liability in the Financial Statements till 30<sup>th</sup> June, 2023</p>               | The disputed tax amount is Rs. 174.95 crores.  |
| 4   | Income Tax Department      | High Court of Bombay                              | The Company has appealed in relation to disallowance of expenses as well as differential position taken by the Income Tax Department w.r.t. taxation of certain incomes. Also, the lower appellate authorities have allowed certain claims in favour of the Company and the Income Tax department has filed an appeal against such claims.  | AY 2013-14                           | <p>Nil</p> <p>There is no contingent liability as the entire amount has been provided in the books of account for the issues under litigation.</p> | The disputed tax amount is Rs. 89.42 crores.   |

| Sl. | Name of the opposing party | Court/ Tribunal/ Agency where litigation is filed | Brief details of the dispute/ litigation   | Assessment Year (AY) | Expected financial implications, if any, due to compensation, penalty etc*  | Quantum of claims, if any#                   |
|-----|----------------------------|---|--|----------------------|---|--|
|     |                            |   | <p>The matter pertains to the industrial undertaking of erstwhile Mahindra Trucks and Buses Limited, which was demerged into the Company pursuant to a Scheme of Arrangement.</p> <p>Some of the issues involved are Product development expenses, transfer pricing adjustment, incentives granted under state incentive schemes, etc.</p>   |                      |   |  |
| 5   | Income Tax Department      | Supreme Court and High Court of Bombay            | <p>The Company has incurred expenses on issue of Foreign Currency Convertible Bonds and Global depository receipts. The Income Tax Department has disputed on the withholding tax on such expenses.</p> <p>The case pending before Supreme Court is filed by Income Tax Department and the case pending before the High Court is filed by the Company on different grounds relating to the said issue.</p> | AY 1998-99           | <p>Nil</p> <p>Rs. 10.87 Crores is disclosed as Contingent Liability in the Financial Statements till 30<sup>th</sup> June, 2023</p> | The disputed tax amount is Rs. 10.87 crores. |
| 6   | Income Tax Department      | Punjab & Haryana High Court                       | The Company has appealed in relation to disallowance of tax holiday/ deduction u/s. 80IA claimed by erstwhile Punjab Tractors Limited, which has since been merged into the Company.   | AY 1997-98           | <p>Nil</p> <p>Rs. 1.21 Crores is disclosed as Contingent Liability in the Financial Statements till 30<sup>th</sup> June, 2023</p>  | The disputed tax amount is Rs. 1.21 crores.  |

\*Based on a preliminary assessment, prevailing law and advice of counsel, the Company is hopeful of a favourable outcome and does not reasonably expect the same to have any material financial impact on the Company. The amount disclosed under "Expected financial implications" is the Contingent Liability position as at 30<sup>th</sup> June, 2023 including notional interest calculated till the said date on demands outstanding, if any. The notional interest will continue to be calculated upto the date of conclusion of litigation on demands outstanding, if any.

#The amount of quantum of claim is the tax on the amount of expenses/ incomes being disputed by the Company/ Tax Department.

**Annexure B - Litigations pertaining to Indirect Taxes**

| SI | Name of the opposing party                         | Court/ Tribunal/ Agency where litigation is filed | Brief details of the dispute/ litigation  | Relevant Period            | Expected financial implications, if any, due to compensation, penalty etc*  | Quantum of claims, if any  |
|----|--|---|---|----------------------------|---|--|
| 1  | Commissioner of Customs, Central Excise, Hyderabad | Supreme Court                                     | <p>The case involves dispute with respect to Classification of Bolero Camper - Double Cab (Vehicle) - Chapter Heading 87.03 Vis-à-vis Chapter Heading 87.04.</p> <p>The Company had received a favourable order from CESTAT, Hyderabad but the opposing party has filed a SLP before the Hon'ble Supreme Court.</p> | July, 2008 till June, 2017 | <p>Nil</p> <p>Rs. 1,757.78 Crores is disclosed as Contingent Liability (including penalty of Rs.26.27 crores) in the financial statements till 30<sup>th</sup> June, 2023</p> | Rs. 725 Crores (demand of differential duty of excise including penalty of Rs.26.27 crores). |

\*Based on a preliminary assessment, prevailing law and advice of counsel, the Company is hopeful of a favourable outcome and does not reasonably expect the same to have any material financial impact on the Company. The amount disclosed under "Expected financial implications" is the Contingent Liability position as at 30<sup>th</sup> June, 2023 including notional interest calculated till the said date on demands outstanding, if any. The notional interest will continue to be calculated upto the date of conclusion of litigation on demands outstanding, if any.