Corporate Social Responsibility Policy

Mahindra & Mahindra Ltd.

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VERSION	PREPARED BY	CHANGES & REASONS FOR CHANGE
2.0	Sheetal Mehta	Amendment in the Schedule VII of the Companies Act 2013 via notifications dated 6th August 2014 & 24th Oct 2014
3.0	Sheetal Mehta	Updating of CSR projects undertaken, and inclusion of notification by the Ministry of Corporate Affairs via circular dated 12th January 2016.

4.0	Sheetal Mehta	Inclusion of a 'Governance Structure', Policy Guidelines & Annexure 1 – List of CSR Projects (2016-17)
5.0	Sheetal Mehta	Updation of Annexure 1 – List of CSR Projects (2017-18)
6.0	Sheetal Mehta	Updation of Annexure 1 – List of CSR Projects (2018-19)

1. Introduction and Background

Since its inception Mahindra & Mahindra Ltd. has been a socially responsible corporate going beyond the legal & statutory requirements to make responsible investments in the community. Evidence of this is the setting up of the K C Mahindra Education Trust in 1954, followed by Mahindra Foundation in 1969, and the 60th year celebrations in 2005 when the Company redefined Corporate Social Responsibility (CSR) and pledged to commit 1% PAT for its CSR initiatives specifically to benefit the economically and socially disadvantaged communities. With the belief that Education is the main route to address India's social challenges, the Company selected Education as its main thrust area for CSR. As a responsible corporate citizen, M&M Ltd. also invested in the areas of public health and environment. More specifically the major CSR programmes that the Company has been investing in, are as follows –

- **Scholarships & Grants** – have been provided to enable students to overcome their financial challenges and fulfill their educational dreams. Some of the scholarships have provided students an opportunity to pursue their post graduate studies in reputed educational institutions overseas while others have provided students from low income group families an opportunity to earn their vocational diploma after completing their courses at government polytechnic institutes. The scholarships have also allowed deserving students an opportunity to study at the Mahindra United World College in Pune.

- **Project Nanhi Kali** – Founded in 1996, this is a sponsorship programme that supports the education of underprivileged girls from poor urban, remote rural and tribal communities by providing them 360 degree support including academic, material & social support. The girls in secondary school are provided access to digital tablets preloaded with educational content both audio and video. Each girl has a unique user id to track her progress. Since 2005 the Project is jointly managed by the K C Mahindra Education Trust and Naandi Foundation. Till

date, the project has supported the education of over 370,000 underprivileged girls across 10 states of India.

- **Mahindra Pride Schools & Classrooms**– Since 2007, these schools have been providing livelihood training to youth from socially and economically disadvantaged communities to enable them to get lucrative jobs based on the skills learned. Training is provided in one of the four verticals of Hospitality Craft, Sales, ITES and Automotive (Service Technician & Sales). The 9 Mahindra Pride Schools are located in Pune, Chandigarh, Patna, Srinagar, Hyderabad, Varanasi and three in Chennai. With the objective of reaching out to a larger number of students in the most cost efficient manner, the Mahindra Pride Classrooms have been rolled out in partnerships with Polytechnics, Engineering colleges, Arts & Science Colleges and ITI's, in 14 states of India. The Mahindra Pride Classrooms modules focus on training in English Speaking, Life Skills, Aptitude, Interview, Group Discussion and Digital Literacy thereby drastically improving their chances of being gainfully employed.

- **Lifeline Express** – The Company has regularly partnered with Impact India Foundation to sponsor the Lifeline Express which provides communities in remote rural areas an access to health care. Free surgeries for cataract removal, cleft lip and deafness correction, medical treatment for epilepsy as well as dental treatments are provided through Lifeline Express. Oral, Breast and cervical cancer screening is also part of the services offered.

- **Project Hariyali** – Since 2007 the Company has committed to increase green cover by planting a million trees every year on an ongoing basis.

- **Watershed Management -** The Company has partnered with the Government of Madhya Pradesh to implement a watershed management project which includes water conservation,

soil conservation and increasing availability of water for irrigation with the objective of increasing agricultural productivity, enhancing livelihood and increasing green cover.

- **Swachh Bharat Swachh Vidyalaya programme** – In support of the Prime Minister's appeal for "Clean India", the Mahindra Group contributed to the Government's "Swachh Bharat Swachh Vidyalaya" programme by constructing 4597 toilets primarily for girls in government schools. Further, a large number of public toilets were also constructed for the community. Besides maintaining the toilets for 12 months the Mahindra Group is also carrying out training programmes to bring about behavioral changes in the girls, parents and school authorities towards more hygienic practices.

- **Wardha Farmer Family & Krishi Mitr Project** - The project supports small and marginal farmers by training them in effective farming practices including soil health, crop planning, and creating model farms for increased crop productivity.

- **Employee Social Options** - Mahindra employees have been encouraged to volunteer for various CSR projects in the areas of education, health and environment through the Employee Social options programme (Esops). Some of the projects to which the employees have extended their volunteering efforts are skill development, career counselling, HIV/AIDS awareness, health camps, road safety awareness campaigns and cleanliness drives under *Swachh Bharat.*

- **Disaster Relief and Rehabilitation** - The Company has provided consistent and timely support to relief and rehabilitation initiatives in those parts of India which are affected by natural calamities by either contributing to the Prime Minister's or Chief Minister's Relief Fund or by directly engaging in relief efforts . A Relief and Rehabilitation committee has been set

up and a website is put in place to respond during a man-made or natural calamity. The country has been divided into 5 zones with each zone being represented by a Zonal SPOC. Each zonal SPOC further coordinates with city SPOCs during any crisis.

In keeping with the RISE philosophy of the Mahindra Group, the Company will continue to drive positive change to enable people and communities to RISE above their limiting circumstances.

2. Objective of the CSR Policy

The **objective** of this policy is to -

- Promote a unified and strategic approach to CSR across the Company by incorporating under one 'Rise for Good' umbrella the diverse range of its philanthropic giving, identifying select constituencies and causes to work with, thereby ensuring a high social impact.
- Ensure an increased commitment at all levels in the organisation, by encouraging employees to participate in the Company's CSR and give back to society in an organised manner through the employee volunteering programme called ESOPs.

3. Scope and Applicability

This policy shall be applicable to all sectors and employees of Mahindra & Mahindra Ltd.

4. Policy Statement

4.1 CSR Vision Statement & Ideology

Our redefined 'Core Purpose' is to "challenge conventional thinking and innovatively use all our resources to drive positive change in the lives of our stakeholders and communities across the world, to enable them to RISE". In line with our Core purpose, our CSR vision is to focus our efforts within the constituencies of girls, youth & farmers by innovatively supporting them through programmes designed in the domains of education, health and environment while harnessing the power of technology. By investing our CSR efforts in these critical constituencies who contribute to nation building and the economy, we will enable our stakeholders and communities to RISE.

For Mahindra & Mahindra Ltd., responsible business practices include being responsible for our business processes, products, engaging in responsible relations with employees, customers and the community. Hence for the Company, Corporate Social Responsibility goes beyond just adhering to statutory and legal compliances, and creates social and environmental value for our key stakeholders.

4.2. Total Outlay

From April 1st, 2014 in line with the new Companies Act 2013 (the Act), Mahindra & Mahindra Ltd. pledges to contribute at least 2% of the average net profits of the Company made during the 3 immediately preceding financial years specifically towards CSR initiatives. For this purpose, the net profit and average net profit shall be calculated in accordance with the provisions of section 198 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

The Company may spend up to 5% of total CSR expenditure in one financial year on building CSR capabilities.

In case there is any unspent amount from out of the 2% average net profits of the Company made during the 3 immediately preceding financial years, the Board of the Company may decide to carry this forward to the next financial year.

The surplus arising out of the CSR activities will not be considered as a part of the business profits of the Company.

4.3 CSR Thrust Areas

The Company will focus its efforts within the constituencies of girls, youth & farmers through programmes designed in the domains of education, health and environment.

However our commitment to CSR will be manifested by investing resources in any of the following areas -

1. Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive health care and sanitation including contributions to the Swachh Bharat Kosh set up by the Central Government for the promotion of sanitation & making available safe drinking water;

2. Promoting education, including special education and employment enhancing vocation skills especially among children, woman, elderly & the differently abled and livelihood enhancement projects;

3. Promoting gender equality, empowering women, setting up homes and hostels for women & orphans; setting up old age homes, day care centres, and such other facilities for senior citizens & measures for reducing inequalities faced by socially & economically backward groups;

4. Ensuring environmental sustainability, ecological balance, protection of flora & fauna, animal welfare, agroforestry, conservation of natural resources & maintaining quality of soil, air & water, including contribution to the Clean Ganga Fund set up by the Central Government for rejuvenation of the river Ganga;

5. Protection of national heritage, art & culture including restoration of buildings & sites of historical importance & works of art; setting up of public libraries; promotion & development of traditional arts & handicrafts;

6. Measures for the benefit of armed forces veterans, war widows & their dependents;

7. Training to promote rural sports, nationally recognized sports, paralympic sports & Olympic sports;

8. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development & relief & welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities & women;

9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

10. Rural development projects

11. Slum Area Development.

Apart from making contributions to its Corporate Foundation's/Trust's projects (K C Mahindra Education Trust and Mahindra Foundation), the Company may also make contributions towards the corpus of the said Foundations / Trusts subject to the approval of the Board. The Company may also make contributions to 'think tanks' for projects permitted under Schedule VII of the Act.

The major CSR projects are shown in Annexure 1.

4.4. Governance Structure

The Company has a well-defined and robust governance structure to oversee the implementation of the CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

Board-level CSR Committee – The Board level Corporate Social Responsibility Committee (CSR Committee) of the Company shall be responsible for monitoring the CSR Policy from time to time. The CSR Committee shall approve and recommend to the Board, the projects or programmes to be undertaken, the modalities of execution and implementation schedule from time to time.

Apart from recommending and approving budgets for project implementation, the Committee will also institute a monitoring mechanism to track the progress of each project. The Committee reports in to the Company's Board of Directors. The members of the Board Level CSR Committee are as follows:

Dr. Vishakha N. Desai (Chairperson),

Mr. Anand G. Mahindra,

Mr. R. K. Kulkarni,

Dr. Pawan Goenka and

Mr. Vikram Singh Mehta

CSR Council - The Company has set up a CSR Council chaired by the Group President (HR & Corporate Services), & CEO (After-Market Sector) and Member of the Group Executive Board and comprises of senior management executives from all sectors, senior CSR executives and a CSR advisor. The CSR Council implements the CSR strategy and reports in to the Board level CSR Committee.

4.5 Implementation

The Company has set up a CSR Council which is responsible for the implementation of the CSR activities which have been approved by the CSR Committee at the board level. The CSR Council has a formal process of evaluating and approving CSR projects.

1% of the CSR budget is managed by the CSR Council which focuses on long term high impact and high investment projects of the Company and the balance 1% of the budget is managed by the Auto and Farm Equipment Sector which focus on projects that cater to the local needs of the communities within which they operate.

While CSR programmes may be identified by the CSR Department, Corporate Foundations (KCMET, Mahindra Foundation) or Sectors, the CSR Council will also evaluate the projects submitted directly by reputed not for profit organisations having an established track record of at least 3 years in carrying out a similar activity. To ensure that there is focus and maximum impact, the CSR Council will endeavor to work on fewer projects over a longer period of time.

4.6 Monitoring process of CSR activities

The CSR Council will convene quarterly to review the progress of varied CSR projects in terms of both outcome assessment and financial monitoring. The Council will review the strategy from time to time and may recommend new focus areas and projects as and when required to the CSR Committee at the Board Level. In addition, the CSR Council will mandate the effective and timely monitoring and evaluation of varied CSR projects by directing its CSR department or an independent third party agency to carry out situational analysis, need assessment surveys, project visits, or impact studies, etc. if and as required especially for the strategic and high value CSR programmes. In order to ensure transparency and communication with all stakeholders, the CSR Policy will be uploaded on the Company website so that it is available in the public domain.

4.7 Executing Agency / Partners

CSR initiatives will be implemented either directly by the Company through its ESOPs structure where the Mahindra employees will directly implement the CSR programmes or through implementing partners which include NGOs having an established track record of at least 3 years in carrying out the specific activity. The main implementation partners the Company will continuously work with are the Company's Foundations namely the Mahindra Foundation, the K C Mahindra Education Trust, the Tech Mahindra Foundation and the Naandi Foundation.

The following minimum criteria will be ensured while selecting NGO's / voluntary organizations for programme execution

a) The NGO is a registered Society / Public Charitable Trust / not for profit organization established under section 8 of the Act.

b) The NGO has a permanent office / address in India

c) The NGO has a valid Income Tax Exemption Certificate

d) The NGO has submitted a detailed project proposal and budget which has been approved by the CSR Council.

The Company may also collaborate with other companies to undertake CSR projects or programmes, provided the CSR Committees of the respective companies are in a position to report separately on such projects or programmes.

For CSR activities undertaken through other Executing Agency, the Company will specify the projects or programmes to be undertaken through these agencies, the modalities of utilization of funds on such projects or programmes.

4.8 Policy Guidelines

- All CSR Projects must be aligned as prescribed in Schedule VII of the Companies Act, 2013

- CSR projects or programmes or activities must be undertaken in India alone.

- CSR activities must not include the activities undertaken in pursuance of normal course of business of the Company

- Projects or programmes or activities that benefit only the employees of the Company and their families shall not be considered as CSR.

- CSR activities should be in project/ programme mode. One-off events such as marathons/ awards/ charitable contribution/ advertisements / sponsorship of TV programmes etc. will not qualify as part of CSR expenditure.

- Contribution of any amount directly or indirectly to any political party shall not be considered as CSR.

Rajeev Dubey

Chairman (Group CSR Council)

&

Group President (HR & Corporate Services)

& CEO (After-Market Sector)

Member of the Group Executive Board

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Annexure 1 – Key CSR projects of M&M Ltd. (2018-19)

Sl. No.	CSR Programmes	Category under Schedule VII	Implementation Modality	Implementation Schedule			
				Q1	Q2	Q3	Q4
	PROMOTION OF EDUCATION						
1.	Project Nanhi Kali- Education of the girl child	2	TIAI & TIAE	☑	☑	☑	☑
2.	Mahindra Scholarship for UWC students	2	TIAI	☑	☑	☑	☑
3.	K C Mahindra Scholarship for Post Graduate Studies Abroad	2	TIAI		☑		
4.	Shiksha Kendras of Seva Mandir Education Trust	2	TIAE	☑	☑	☑	☑
5.	Mahindra Academy Schools	2	TIAI	☑	☑	☑	☑
6.	Gyandeep - Promotion of Education	2	DIR & TIAE	☑	☑	☑	☑
7.	Saarthi Abhiyaan - Scholarships for Girls	2	TIAE	☑	☑	☑	☑
8.	Streetsmart - Road Awareness Programs	1&2	DIR & TIAE	☑	☑	☑	☑
9.	Baja - Project Based Learning	2	TIAE	☑	☑	☑	☑
10.	A WORLD IN MOTION - Project based learning of Mechanical concepts	2	DIR & TIAE	☑	☑	☑	☑
11.	Indian Council on Global Relations	2	TIAE	☑	☑	☑	☑
12.	J C Mahindra High School, Chincholi	2	TIAI	☑	☑	☑	☑
13.	Jammu Kashmir Study Centre	2	TIAE	☑	☑	☑	☑
	YOUTH SKILLING						
1.	Mahindra Pride School	2	TIAI & TIAE	☑	☑	☑	☑
2.	Hunnar - Skill Development training for youth increasing their scope for employability	2	DIR & TIAE	☑	☑	☑	☑
	ENVIRONMENT & RURAL DEVELOPMENT						
1.	Mahindra Hariyali	4	DIR & TIAE	☑	☑	☑	☑
2.	Wardha Farmer Family Project	4	TIAE	☑	☑	☑	☑
3.	Krishi Mitr - Agri Productivity Projects	4	DIR & TIAE	☑	☑	☑	☑
4.	Integrated Watershed Management Programme	10	TIAE	☑	☑	☑	☑
5.	Gram Vikas - Rural Development Projects (Shiv Jal Kranti)	10	TIAE	☑	☑	☑	☑
6.	VSTF-Village Social Transformation Foundation in Maharashtra	10	TIAE	☑	☑	☑	☑
7.	IITM Project	9	TIAE	☑	☑	☑	☑
8.	Project Prerna	4	DIR & TIAE	☑	☑	☑	☑
9.	EHS + Center	4	TIAE	☑	☑	☑	☑
10	Mahindra TERI Centre of Excellence	4	TIAE	☑	☑	☑	☑
	HEALTH						

No.	Program		Agency				
1.	Palcare	1	TIAI	☑	☑	☑	☑
2.	KARO	1	TIAI	☑	☑	☑	☑
3.	Head and Neck Cancer Institute (Cancare)	1	TIAI	☑	☑	☑	☑
4.	Sehat - Multi Disciplinary Programs	1	DIR & TIAE	☑	☑	☑	☑
5.	Swachh Bharat	1	DIR &TIAE	☑	☑	☑	☑
6.	The Live Love Laugh Foundation – School Support program	1&2	TIAE	☑	☑	☑	☑
7.	Life Line Express	1	DIR & TIAE			☑	
8.	Jeevandaan - Blood Donation including life support for thalassemia patient	1	DIR	☑	☑	☑	☑
9.	Navdrushti - Eye care & vision corrections	1	DIR & TIAE	☑	☑	☑	☑
10.	Samantar - Healthcare for the Specially-abled	1	TIAE	☑	☑	☑	☑
11.	Healthcare for patients from Chhindwara	1	TIAI	☑	☑	☑	☑

Abbreviation	Description
DIR	Directly: by M&M Ltd.
TIAI	Through Implementing Agency Internal (Corporate Trust- KCMET, Mahindra Foundation, Tech M Foundation)
TIAE	Through Implementation Agency External (Partner NGOs, Trusts, Society, Section 8, Section 25 Companies, Academic & Research Institutions, Other Funding Agencies, Government bodies)
BP	Business Partners, Dealers, Vendors, Service Providers

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