

Corporate Social Responsibility Policy

Mahindra & Mahindra Ltd.

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1. Objective of the CSR Policy :

- 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.
- To 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 (Employee Social Options).

2. Scope and Applicability : This policy shall be applicable to all sectors and employees of Mahindra & Mahindra Ltd.

3. Policy Statement

3.1 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.

3.2. 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.

3.3. 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 areas shown in Annexure 1. 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 of the Company are shown in Annexure 2.

3.4. 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 into the Company's Board of Directors. The members of the Board Level CSR Committee are : - Dr. Vishakha N. Desai (Chairperson & Independent Director), Mr. Anand G. Mahindra, Dr. Pawan Goenka and Mr. Vikram Singh Mehta (Independent Director).

CSR Council - The Company has set up a CSR Council chaired by the President – Group HR and Communications & 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 to the Board level CSR Committee.

3.5 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.

3.6 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.

3.7 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.

3.8 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.



Mr. Ruzbeh Irani

**President – Group HR and Communications
& Member of the Group Executive Board**

Annexure 1 – 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 areas shown below -

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. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
10. Rural development projects
11. Slum Area Development.
12. Disaster management, including relief, rehabilitation and reconstruction activities.

Annexure 2 – Key CSR projects of M&M Ltd. (2019-2020)

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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2.	Mahindra Scholarship for UWC students	2	TIAI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3.	K C Mahindra Scholarship for Post Graduate Studies Abroad	2	TIAI		<input checked="" type="checkbox"/>		
4.	Shiksha Kendras of Seva Mandir Education Trust	2	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Mahindra Academy Schools	2	TIAI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6.	Gyandeeep - Promotion of Education	2	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7.	Saarathi Abhiyaan - Scholarships for Girls	2	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Streetsmart - Road Awareness Programs	1&2	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
9.	Baja - Project Based Learning	2	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
10.	A WORLD IN MOTION - Project based learning of Mechanical concepts	2	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
11.	Indian Council on Global Relations	2	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
12.	J C Mahindra High School, Chincholi	2	TIAI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
13.	Adarsh Vidyalaya (Reconstruction)	2	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	YOUTH SKILLING						
1.	Mahindra Pride Schools and Classrooms	2	TIAI & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2.	Hunnar - Skill Development training for youth increasing their scope for employability	2	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	ENVIRONMENT & RURAL DEVELOPMENT						
1.	Mahindra Hariyali	4	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2.	Wardha Farmer Family Project	4	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Krishi Mitr - Agri Productivity Projects	4	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Integrated Watershed Management Programme	10	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Gram Vikas - Rural Development Projects (Shiv Jal Kranti)	10	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6.	VSTF-100 Village programme	10	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7.	VSTF – SMART	10	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8.	IITM Project	9	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
9.	Project Purna	4	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
9	Mahindra TERI Centre of Excellence	4	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	HEALTH						
1.	Palcare	1	TIAI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2.	Head and Neck Cancer Institute (Cancare)	1	TIAI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

3.	Sehat - Multi Disciplinary Programs	1	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Swachh Bharat	1	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Jeevandaan - Blood Donation including life support for thalassemia patient	1	DIR	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6.	Navdrushti - Eye care & vision corrections	1	DIR & TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7.	Samantar - Healthcare for the Specially-abled	1	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Healthcare for patients from Chhindwara	1	TIAI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
9.	Redevelopment of Mata Ramabai Ambedkar Worli Smashan Bhumi	1	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
10.	Nutrition Survey	1	TIAE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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

Annexure 3 – Version History of the CSR Policy

Version History		
VERSION	PREPARED BY	CHANGES & REASONS FOR CHANGE
2.0	Sheetal Mehta	Amendment in the Schedule VII of the Companies Act 2013 via notifications dated 6 th August 2014 & 24 th Oct 2014
3.0	Sheetal Mehta	Updating of CSR projects undertaken, and inclusion of notification by the Ministry of Corporate Affairs via circular dated 12 th 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) & Amendment in the Schedule VII of the Companies Act 2013 via notifications dated 30 th May, 2019
7.0	Sheetal Mehta	Updation of Annexure 2 – List of CSR Projects (2019-20) & Amendment in the Schedule VII of the Companies Act 2013 as per notifications from MCA dated 11 th October, 2019