

Corporate Social Responsibility Policy

Mahindra & Mahindra Ltd.

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Issuing Authority	Ruzbeh Irani
Owner of the document	Sheetal Mehta
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Version History	Please see Annexure 2

1. Objective of the CSR Policy:

To promote a unified approach to CSR across Mahindra & Mahindra Ltd. ('the Company') by identifying select causes to work with, thereby ensuring a high social impact.

2. Scope and Applicability:

This policy is applicable across Mahindra & Mahindra Ltd.

3. CSR Approach & Guiding Principles:

Driven by 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.

All CSR projects will be in line with the CSR vision, as well as areas listed in Schedule VII of the Companies Act, 2013. CSR projects will be undertaken in India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level. It will not include the activities undertaken in pursuance of normal course of business of the Company, projects benefitting the employees of the Company (as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019) and as amended from time to time), or contributions of any amount directly or indirectly to any political party.

All CSR activities will be in project mode and will not include activities supported on sponsorship basis for deriving marketing benefits for its products or services or activities carried out for fulfilment of any other statutory obligations under any law in force in India.

The major CSR projects of the Company are listed in Annexure 1.

4. 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 the total CSR expenditure in one financial year on administrative expenses relating to the general management and administration of CSR functions in the company.

The surplus arising out of the CSR activities will not be considered as a part of the business profits of the Company and shall be ploughed back into the same project, or shall be transferred to the Unspent CSR Account and it should be spent in pursuance of this CSR policy and annual action plan of the Company, or the Company may transfer such surplus amount to a Fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year.

Any unspent amount, other than unspent amount relating to an ongoing project, will be transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Further, unspent CSR funds of ongoing projects will be transferred within a period of 30 days from the end of the financial year to a special account opened by the company in any scheduled bank called the “Unspent Corporate Social Responsibility Account”. Such amount shall be spent by the company towards CSR within a period of 3 financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of completion of the third financial year.

5. Implementation :

50% 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 50% of the budget is managed by the Auto and Farm Equipment Sector of the Company which focusses on projects that cater to the local needs of the communities within which they operate, until otherwise decided and directed by the CSR Committee.

CSR initiatives will be implemented either directly by the Company through its ESOPs (Employee Social Options) programme, where the Mahindra employees will directly implement the CSR projects, or through implementing partners which include a company established under section 8 of the Act, or a registered public trust or a registered society having an established track record of at least 3 years in undertaking similar activities for which the grant is being given. These organizations would need to be registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961). The above entities shall register with the Central Government by filing the form CSR-1 electronically with the Registrar, with effect from the 1st April 2021.

The Company may engage International Organisations (as defined in Clause 2(g) of the Companies (Corporate Social Responsibility Policy) Rules 2014) for designing, monitoring, and evaluation of CSR Projects as well as capacity building of their personnel.

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

6. Governance and Monitoring Process:

The Company has a well-defined and robust governance structure to oversee the implementation of the CSR Policy and monitoring of CSR projects as per 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 formulating and recommending to the Board the CSR policy and a CSR annual action plan, provided that the Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect. The CSR Committee reports to 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. Anish Shah and Mr. Vikram Singh Mehta (Independent Director).

The CSR Annual Action Plan shall include the following :-

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act,
- (b) the manner of execution of such projects or programmes,
- (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes,
- (d) monitoring and reporting mechanism for the projects or programmes and
- (e) details of need and impact assessment, if any, for the projects undertaken by the company.

Group CSR Council - The Company has set up a Group CSR Council (Council) which is responsible to implement CSR projects as per the CSR Annual Action Plan laid out by the Board level CSR Committee. The Council will convene quarterly to monitor CSR projects and will be responsible to report on the progress of the projects, to the Board and CSR Committee, at regular intervals. The Council will carry out impact assessment of completed CSR Projects having a value of Rs. 1 Cr, through an independent agency, at least once in every three years or such shorter period as may be prescribed by law from time to time.

The CSR Policy of the Company shall be uploaded on the Company's website for information of all stakeholders.



Mr. Ruzbeh Irani

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

Annexure 1 – Key CSR projects of M&M Ltd. (2021-2022)

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	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2.	Mahindra Scholarship for UWC students	2	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Shiksha Kendras / Study Centres (Seva Mandir & MSWC)	2	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Mahindra Schools	2	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Gyandeeep - Promotion of Education	2	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6.	Street smart - Road Awareness Programs	1&2	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7.	Rise Higher for Safe Roads - Samruddhi Mahamarg	2	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Rise Higher for Safe Roads - Tactical Urbanism	2	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
9.	United for Road Safety	2	Direct/ Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
10	Zero Fatality Corridor MPEW	2	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
11.	Adarsh Vidyalaya School reconstruction	2	Implementing organization	<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	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2.	Vocational training of underprivileged youth at Deshpande Pvt. Industrial Training Institute, Haliyali,	2	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Hunnar - Skill Development training for youth thereby increasing their employability quotient + Infra support and capacity building of ITIs	2	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ENVIRONMENT & RURAL DEVELOPMENT							
1.	Mahindra Hariyali	4	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

2.	Wardha Farmer Family Project	4	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Krishi Mitra - Agri Productivity Projects	10	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Integrated Watershed Management Programme	10	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Gram Vikas - Rural Development Projects (Integrated Village Development and creating model villages)	10	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6.	Watershed Management Project at Nashik/Igatpuri	10	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7.	VSTF – SMART	10	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Green Guardian & Suryodaya	4	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
9.	Women empowerment through farm tech prosperity-Project Prerna	4	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	HEALTH						
1.	Palcare & project to support cancer survivors	1	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2.	Lancet Citizen's Forum	1	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Sehat - Multi Disciplinary Programs including Infra support for public health / Cancer care / dialysis / Malnutrition/ Mother & Child Care	1	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Swachh Bharat	1	Direct / Implementing organization	<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 patients	1	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6.	Navdrushti - Eye care & vision correction	1	Direct / Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7.	Samantar - Healthcare for the Specially-abled	1	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Healthcare in remote parts of HP through the Mobile Medical Unit (MMU) programme of Paryas Society	1	Implementing organization	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.	New Flagship project on women's empowerment / sustainability	3 OR 4	To be decided				
2.	Employee Social Options (ESOPS) Programme	Varied Schedule VII categories	To be decided				

Annexure 2 – Version History of the CSR Policy

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 11th October, 2019
8.0	Sheetal Mehta	Updation as per Companies (Corporate Social Responsibility Policy) Amendment Rules 2021