

Corporate Social Responsibility Policy

Mahindra & Mahindra Ltd.

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State whether Policy/Code/ Manual/ Guideline	Policy
Company Level	Company Level
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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 has been to focus our efforts within the constituencies of girls, Women & farmers by innovatively supporting them through programmes designed in the domains of education, health and environment while harnessing the power of technology. Going forward, in order to maximize impact, we will enhance our focus on empowering both girls and women. Additionally, we will continue to support the environment through scaling up our tree plantation programme.

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 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:

The CSR Council will ensure that majority of the budget is invested in long term and high impact projects of girls’ and women’s empowerment, and that of supporting the environment. The Company will continue to support the local needs of the communities within which it operates by investing in projects which address these needs.

CSR initiatives will be implemented either directly by the Company or 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 and holds valid registration certificate under section 12A and 80G 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 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 for undertaking CSR projects, programmes or activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with the requirements of Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules 2014.

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.

Impact assessment point can be added

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 (Chairman), Dr. Anish Shah (Managing Director & CEO) and Mr. Vikram Singh Mehta (Independent Director) and Mr. Muthiah Murugappan (Independent Director).

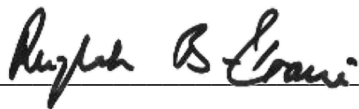
The CSR Annual Action Plan shall include the following:-

- 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 approved 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.

Further, where the Company chooses to collaborate with one or more other companies for the implementation of a CSR project then the impact assessment carried out by any one company for the common project may be shared with the other companies for the purpose of disclosure to the Board and in the annual report on CSR. The sharing of the cost of impact assessment may be decided by the collaborating companies subject to the limit as prescribed in rule 8(3)(c) of the Companies (CSR Policy) Rules, 2014 for each company.

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
& Member of the Group Executive Board**

Annexure 1 – CSR projects of M&M Ltd. (2022-2023)

SR. No	CSR Programmes	Category under Schedule VII	Implementation Modality	Implementation Schedule			
				Q1	Q2	Q3	Q4
	HEALTH						
1	Swaraj Sehat - Mahindra Mobile Primary Health & Cancer Care Project	1	Implementing Agency	√	√	√	√
2	KCO Sehat - Swachh Bharat-Solid Waste Management	1	Implementing Agency	√	√	√	√
3	KCO Sehat - Swachh Bharat, Kandivali and Kherwadi	1	Direct	√	√		
4	AD KND Sehat	1	Direct		√	√	√
5	AD NSK1 Sehat - Bolki Anganwadi	1	Implementing Agency	√	√	√	√
6	AD Chakan Sehat - Integrated health project	1	Implementing Agency	√	√	√	√
7	KCO Swach Bharat – Beautification of P. Balu Beach	1	Implementing Agency			√	√
	EDUCATION AND SKILL DEVELOPMENT						
1	Project Nanhi Kali - Education of the girl child	2	Implementing Agency	√	√	√	√
2	Support to JCMM School, Khapoli	2	Implementing Agency			√	√
3	Mahindra World School Chennai Renovation	2	Implementing Agency		√	√	√
4	Mahindra All India Talent Scholarship	2	Implementing Agency		√	√	√
5	FD Jaipur Hunnar – Livelihood through farm mechanization skilling (tractor & agri equipment)	2	Implementing Agency		√	√	√
6	FD RDP Gyandeeep	2	Implementing Agency			√	√
7	FD S&CO Gyandeeep - Scholarships for students	2	Implementing Agency			√	√
8	FD NGP Hunnar – Livelihood through farm mechanization skilling (tractor & agri equipment)	2	Implementing Agency		√	√	√
9	FD ZHB Hunnar – Livelihood through farm mechanization skilling (tractor & agri equipment)	2	Implementing Agency		√	√	√

10	Powerol Hunnar - skill development	2	Implementing Agency			√	√
11	Swaraj Gyandeep - Promoting Quality Education through Critical Infrastructure & Scholarship Support in Government Schools	2	Implementing Agency	√	√	√	√
12	Swaraj Hunnar - skilling of youth on agri & non agri traits	2	Implementing Agency	√	√	√	√
13	KCO Street Smart - I Raaste-Nagpur	2	Implementing Agency	√	√	√	√
14	AD KND Hunnar - youth skill development	2	Implementing Agency	√	√	√	√
15	AD KND Gyandeep – AWIM	2	Direct	√	√	√	√
16	AD KND Gyandeep – Scholarships	2	Implementing Agency	√	√	√	√
17	AD IGT Street Smart - Road safety engineering intervention	2	Implementing Agency		√	√	√
18	AD IGT Hunnar	2	Implementing Agency		√	√	√
19	AD MRV Hunnar	2	Implementing Agency	√	√	√	√
20	AD NASHIK 1 Hunnar - skill development	2	Implementing Agency		√	√	√
21	AD S&CO Hunnar	2	Implementing Agency		√	√	√
22	AD SBU Gyandeep - smart school	2	Implementing Agency	√	√	√	√
23	AD Chakan Gyandeep	2	Implementing Agency	√	√	√	√
24	AD Chakan Hunnar	2	Implementing Agency	√	√	√	√
25	MEML Hunnar - skill development	2	Implementing Agency	√	√	√	√
26	Volunteering Projects	2	Implementing Agency/ Direct	√	√	√	√
	WOMEN EMPOWERMENT						
1	Women Empowerment with Regenerative Agriculture – UP & Punjab	3	Implementing Agency	√	√	√	√
2	Women Empowerment with Regenerative Agriculture – Wardha- Maharastra	3	Implementing Agency	√	√	√	√
3	WEE- ITES & Other sectors	3	Implementing Agency		√	√	√
4	WEE- Apparel Sector	3	Implementing Agency		√	√	√
5	WEE- Skill training for women in Himachal Pradesh	3	Implementing Agency/ Direct		√	√	√
6	Mahindra Pride	3	Implementing Agency	√	√	√	√
7	AD NSK1 Prerna – Women with wings	3	Implementing Agency		√	√	√

8	KCO Prerna - women empowerment	3	Implementing Agency			√	√
9	MTWD Prerna - women empowerment	3	Implementing Agency			√	√
10	Swaraj Krishi Mitr - Prerna - Empowering women for livelihood enhancement	3	Implementing Agency	√	√	√	√
	ENVIRONMENT & NATURAL RESOURCE MANAGEMENT						
1	Araku Hariyali	4	Implementing Agency	√	√	√	√
2	Northern India Hariyali	4	Implementing Agency	√	√	√	√
3	Antim Prasthan	4	Implementing Agency			√	√
4	AD KND Hariyali	4	Implementing Agency		√	√	√
5	AD IGT Hariyali	4	Implementing Agency			√	√
6	AD IGT Hariyali	4	Implementing Agency		√	√	√
7	AD Nasik 1 Green Guardian – Natural Resource management	4	Implementing Agency	√	√	√	√
8	MEML Hariyali	4	Implementing Agency	√	√	√	√
9	Swaraj Green Guardian - Sustainable Village Development & increasing green cover through Hariyali	4	Implementing Agency	√	√	√	√
10	Swaraj Green Guardian - Renovation of Ponds & Roof Rainwater Tanks in Govt Schools of Rajasthan for water conservation	4	Implementing Agency	√	√	√	√
	TRAINING TO PROMOTE RURAL SPORTS						
1	AD NSK1 Prerna - Promoting Girl Athletes	7	Implementing Agency	√	√	√	√
	RURAL DEVELOPMENT						
1	FD KND Gram Vikas - Integrated Community Development	10	Implementing Agency		√	√	√
2	FD Jaipur Gram Vikas - Integrated Village Development	10	Implementing Agency			√	√
3	FD Nagpur Gram Vikas	10	Implementing Agency		√	√	√
4	FD Nagpur Krishi Mitr for youth and women	10	Implementing Agency			√	√
5	FD ZHB Gram Vikas - Integrated village development	10	Implementing Agency	√	√	√	√

6	Krish E Krishi Mitr – agro ecology transformation- Mehboobnagar	10	Implementing Agency		√	√	√
7	Krish E Krishi Mitr- agro ecology- Chindwara	10	Implementing Agency		√	√	√
8	Krish E Krishi Mitr – agro ecology transformation- Chindwara	10	Implementing Agency			√	√
9	KCO Gram Vikas - Integrated village development through soil & water conservation	10	Implementing Agency	√	√	√	√
10	KCO Gram Vikas - Integrated village development through water conservation	10	Implementing Agency	√	√	√	√
11	Hatta Gram Vikas - Watershed Development Fund	10	Direct	√	√	√	√
12	Nashik Gram Vikas - watershed management (PPP)	10	Direct	√	√	√	√
13	KCO Gram Vikas - Watershed Development Fund (WDF)	10	Implementing Agency	√	√	√	√
14	KCO Gram Vikas - Climate Proofing NABARD Nashik (PPP)	10	Implementing Agency	√	√	√	√
15	KCO Gram Vikas - Watershed Development Fund Igatpuri	10	Implementing Agency	√	√	√	√
16	KCO Gram Vikas - Water management – Barmer	10	Implementing Agency	√	√	√	√
17	KCO Gram Vikas - water management	10	Implementing Agency	√	√		
18	KCO Gram Vikas - Diversion Based Farming	10	Implementing Agency	√	√		
19	KCO Gram Vikas	10	Implementing Agency/Direct			√	√
20	AD KND Gram Vikas - Integrated village development	10	Implementing Agency	√	√	√	√
21	AD KND Gram Vikas - Integrated village development (Vikramgad)	10	Implementing Agency			√	√
22	AD HRD Gram Vikas - Integrated village development	10	Implementing Agency		√	√	√
23	AD MRV Gram Vikas	10	Implementing Agency	√	√	√	√
24	AD SBU Gram Vikas	10	Implementing Agency	√	√	√	√
25	AD ZHB Gram Vikas	10	Implementing Agency	√	√	√	√
26	AD Chakan Gram Vikas - Integrated village development	10	Implementing Agency	√	√	√	√
27	AD NSK 2 Gram Vikas - Enhancing Livelihoods Security through Sustainable Agriculture and Entrepreneurship Development	10	Implementing Agency	√	√	√	

Annexure 2 – 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
8.0	Sheetal Mehta	Updation as per Companies (Corporate Social Responsibility Policy) Amendment Rules 2021
8.1	Sheetal Mehta	Updating of Annexure 2 – List of CSR Projects (2021-22)

8.2	Sheetal Mehta	Updating of Annexure 2 – List of CSR Projects (2021-22)
9.0	Sheetal Mehta	Updating of Annexure 2 – List of CSR Projects (2022-23)