

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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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, youth & 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 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 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.

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) and Mr. Muthiah Murugappan (Independent Director).

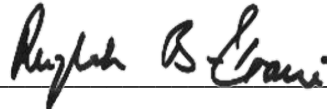
The CSR Annual Action Plan shall include the following :-

- 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. (2021-2022)

SI 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 Agency	√	√	√	√
2	Mahindra Scholarship for UWC students	2	Implementing Agency	√	√	√	√
3	Mahindra Academy, Malad	2	Implementing Agency			√	√
4	Mahindra Academy Zaheerabad	2	Implementing Agency			√	√
5	Mahindra World School Chennai Renovation	2	Implementing Agency	√	√	√	√
6	Adarsh Vidyalaya school reconstruction	2	Implementing Agency	√	√	√	
7	Mahindra All India Talent Scholarship	2	Implementing Agency	√	√	√	√
8	FD- ZHB Gyandeeep (CAPP)	2	Implementing Agency			√	√
9	FD- RDP Gyandeeep (CAPP)	2	Implementing Agency			√	√
10	FD- JPR Gyandeeep (CAPP)	2	Implementing Agency			√	√
11	FD-Nagpur Gyandeeep (CAPP)	2	Implementing Agency	√	√	√	√
12	AD MRV Gyandeeep (CAPP)	2	Implementing Agency	√	√	√	√
13	FD- ZHB Gyandeeep	2	Implementing Agency				√
14	FD- RDP Gyandeeep	2	Implementing Agency	√	√	√	√
15	AD HRD Gyandeeep	2	Direct	√	√	√	√
16	AD KND Gyandeeep	2	Implementing Agency			√	√
17	AD ZHB Gyandeeep	2	Implementing Agency	√	√	√	√
18	AD SBU Gyandeeep	2	Implementing Agency	√	√	√	√
19	AD- CHAKAN Gyandeeep	2	Implementing Agency			√	√
20	FD-KND Street Smart	2	Implementing Agency		√	√	

21	AD IGT Street Smart	2	Implementing Agency				√
22	AD IGT Street Smart	2	Direct			√	√
23	AD NSK1 Street Smart	2	Implementing Agency			√	√
24	AD ZHB Street Smart	2	Direct			√	√
25	AD- CHAKAN Street Smart	2	Implementing Agency	√	√	√	√
26	Central AD AWIM by SAE India	2	Direct	√	√	√	√
27	Central AD Rise Higher for safe Roads- Tactical Urbanism	2	Implementing Agency	√	√	√	√
28	Central FD Road Safety- Nagpur- Project I Raaste	2	Implementing Agency	√	√	√	√
29	Central AD United for Road Safety	2	Implementing Agency			√	√
30	Central AD Street Smart - Jeevan doot	2	Implementing Agency	√	√	√	√
31	AD ZHB Street Smart	2	Implementing Agency				√
32	AD- CHAKAN Mahindra Saarthi Abhiyan	2	Direct	√	√	√	√
33	Mahindra University project- Infra Support	2	Implementing Agency	√	√	√	√
	YOUTH SKILLING						
1	Mahindra Pride Schools and Classrooms	2	Implementing Agency	√	√	√	√
2	Vocational training of underprivileged youth at Deshpande Pvt. Industrial Training Institute	2	Implementing Agency	√	√	√	
3	Skill Development Center infrastructure support, Mohali, Punjab, Swaraj Division	2	Implementing Agency			√	√
4	Hunnar Central FD	2	Implementing Agency	√	√	√	√
5	Hunnar Swaraj Plant	2	Implementing Agency	√	√	√	√
6	Hunnar FD- S&CO	2	Implementing Agency	√	√	√	√
7	Hunnar MTWD	2	Implementing Agency	√	√	√	√
8	Hunnar FD-Nagpur	2	Implementing Agency	√	√	√	√
9	Hunnar AD MRV	2	Implementing Agency	√	√	√	√
10	Hunnar AD NSK1	2	Implementing Agency			√	√
11	Hunnar AD ZHB	2	Implementing Agency	√	√	√	√

12	Hunnar AD S&CO	2	Implementing Agency		√	√	√
13	Hunnar AD S&CO(MEML)	2	Implementing Agency			√	√
14	Hunnar AD- CHAKAN	2	Implementing Agency			√	√
	ENVIRONMENT & RURAL DEVELOPMENT						
1	Araku Hariyali	4	Implementing Agency	√	√	√	√
2	Northern India Hariyali	4	Implementing Agency			√	√
3	Hariyali AD IGT	4	Direct	√	√		
4	Hariyali AD NSK1	4	Implementing Agency			√	√
5	Hariyali AD NSK1	4	Direct	√	√		
6	Gram Vikas AD SBU	10	Implementing Agency			√	√
7	Enhancing Livelihoods Security through Sustainable Agriculture and Entrepreneurship Development AD NSK2	10	Implementing Agency	√	√	√	√
8	Gram Vikas AD SBU	10	Direct	√	√	√	√
9	Water Management- Sanagareddy Central SD	10	Implementing Agency	√	√	√	√
10	Water Management- Latur Central SD	10	Implementing Agency	√	√	√	√
11	Water Management- Jalgaon Central FD	10	Implementing Agency	√	√	√	√
12	Water Management- Balangir Central FD	10	Implementing Agency	√	√	√	√
13	Water Management- Rudrapur Central SD	10	Implementing Agency	√	√	√	√
14	Water Management Sonbhadra Central FD	10	Implementing Agency	√	√	√	√
15	Water Management- Barmer Central SD	10	Implementing Agency	√	√	√	√
16	Water Management- Bhopal Central FD	10	Implementing Agency	√	√	√	√
17	WDF Hatta & Climate proofing IWMP Damoh	10	Direct	√	√	√	√
18	Integrated Village Development project- Alwar Central SD	10	Implementing Agency	√	√	√	√
19	Water Management- PPP - NASHIK IWMP NSK	10	Direct	√	√	√	√
20	CLIMATE proofing NABARD Igatpuri, Nashik IWMP NSK	10	Implementing Agency	√	√	√	√
21	Model Village development program - Raichur Central SD	10	Implementing Agency	√	√	√	√

22	Model Village development program, Rewa Central SD	10	Implementing Agency	√	√	√	√
23	Integrated Village Development project - Muzaffarpur Central SD	10	Implementing Agency	√	√	√	√
24	Gram Vikas FD- JPR	10	Implementing Agency	√	√	√	√
25	Gram Vikas FD-Nagpur	10	Implementing Agency	√	√	√	√
26	Gram Vikas FD-Nagpur	10	Implementing Agency	√	√	√	√
27	Gram Vikas AD KND	10	Implementing Agency	√	√	√	√
28	Gram Vikas AD ZHB	10	Implementing Agency	√	√	√	√
29	Green Guardians Swaraj Plant	10	Implementing Agency		√	√	√
30	Green Guardians AD MRV	10	Implementing Agency	√	√	√	√
31	Green Guardians AD NSK1	10	Implementing Agency	√	√	√	√
32	Green Guardians Swaraj Plant	10	Implementing Agency	√	√	√	√
33	Krishi Mitr- Farmer support project Samridhi/Krish E	10	Implementing Agency	√	√	√	√
34	Rural Electrification Central FD	10	Direct	√	√	√	√
	HEALTH						
1	Safe Drinking Water Project in Chincholi	1	Implementing Agency		√	√	√
2	Palcare - Palliate Care	1	Implementing Agency	√	√	√	√
3	Lancet Citizen's Forum	1	Implementing Agency	√	√	√	√
4	Head and Neck Cancer Institute	1	Implementing Agency	√	√	√	√
5	Jeevandaan FD- ZHB	1	Implementing Agency	√	√	√	√
6	Jeevandaan FD-Nagpur	1	Implementing Agency	√	√	√	√
7	Jeevandaan AD HRD	1	Direct			√	√
8	Sehat AD SBU	1	Direct			√	√
9	Sehat Central AD	1	Implementing Agency	√	√	√	√
10	Sehat Swaraj Plant	1	Implementing Agency	√	√	√	√
11	Sehat FD-KND	1	Implementing Agency	√	√	√	√
12	Sehat FD- ZHB	1	Direct	√	√	√	√

13	Sehat FD- ZHB	1	Implementing Agency	√	√	√	√
14	Sehat FD- RDP	1	Implementing Agency			√	√
15	Sehat FD-Nagpur	1	Implementing Agency	√	√	√	√
16	Sehat AD HRD	1	Direct			√	√
17	Sehat AD IGT	1	Direct			√	√
18	Sehat AD IGT	1	Implementing Agency	√	√	√	√
19	Sehat AD KND	1	Direct			√	√
20	Sehat AD NSK1	1	Implementing Agency	√	√		
21	Sehat AD ZHB	1	Implementing Agency	√	√	√	√
22	Sehat FD-Nagpur	1	Implementing Agency				√
23	Sehat AD- CHAKAN	1	Implementing Agency				√
24	Sehat AD- CHAKAN	1	Implementing Agency	√	√	√	√
25	Swachh Bharat Central AD	1	Implementing Agency	√	√	√	√
26	Swachh bharat Central AD	1	Direct	√	√	√	√
27	Swachh Bharat FD- RDP	1	Implementing Agency	√	√	√	√
28	Swachh Bharat FD-Nagpur	1	Implementing Agency	√	√	√	√
29	Swachh Bharat AD MRV	1	Implementing Agency			√	√
30	Swachh Bharat AD NSK1	1	Implementing Agency			√	√
31	Swachh Bharat AD NSK1	1	Direct	√	√		
	WOMEN'S EMPOWERMENT						
1	Women Empowerment with Regenerative Agriculture – UP & Punjab	3	Implementing Agency			√	√
2	Women's Initiative for Synergistic Empowerment (WISE) through WEN	3	Implementing Agency			√	√
3	Krishi Mitr- Prerna Swaraj Plant	3	Implementing Agency	√	√	√	√
4	Krishi Mitr- Prerna FD-KND	3	Implementing Agency	√	√	√	√
5	Krishi Mitr- Prerna FD- ZHB	3	Implementing Agency	√	√	√	√

6	Krishi Mitr- Prerna FD- RDP	3	Implementing Agency	√	√	√	√
7	Krishi Mitr- Prerna FD- JPR	3	Implementing Agency	√	√	√	√
8	Krishi Mitr- Prerna FD-Nagpur	3	Implementing Agency	√	√	√	√
9	Krishi Mitr- Prerna FD-Nagpur	3	Implementing Agency	√	√	√	√
10	Krishi Mitr- Prerna Central FD	3	Implementing Agency			√	√
11	Krishi Mitr- Prerna Central FD	3	Implementing Agency				√
	OTHER						
1	Employee Social Options (ESOPS) Programme	Varied Schedule VII categories	Implementing Agency	√	√	√	√
2	Implementing Mass-scale Preventive Actions for COVID Transmission (IMPACT)	1 & 12	Implementing Agency	√	√	√	
3	Project Chaav	1 & 12	Implementing Agency		√	√	√
4	Micro Oxygen Centres in 3 states of Uttarakhand, Rajasthan & Jammu & Kashmir.	1 & 12	Direct / Implementing Agency	√	√	√	√
5	COVID-19 Relief - Oxygen Concentrators – Maharashtra	1 & 12	Direct		√	√	
6	COVID-19 Relief - Oxygen Concentrators – Uttar Pradesh	1 & 12	Direct		√	√	
7	COVID-19 Relief - Oxygen Concentrators – Tamil Nadu	1 & 12	Direct		√	√	
8	COVID-19 Relief - Oxygen Concentrators – Delhi	1 & 12	Direct		√	√	
9	COVID-19 Relief - Oxygen Concentrators – Uttarakhand	1 & 12	Direct		√	√	
10	COVID-19 Relief - Oxygen Concentrators – Maharashtra	1 & 12	Direct		√	√	
11	COVID-19 Relief - Oxygen Concentrators – Karnataka	1 & 12	Direct		√	√	
12	COVID-19 Relief - Oxygen Concentrators – Maharashtra	1 & 12	Direct		√	√	
13	Sehat- COVID 19 response and relief work in Rural Areas of Bharuch District, Gujarat BY Aatapi Seva Foundation	1&12	Implementing Agency		√	√	√
14	Sehat- COVID 19 Relief - Oxygen Plant - Baramati, Maharashtra	1&12	Direct	√	√	√	
15	Sehat- COVID 19 Relief - Oxygen Plant - Nashik, Maharashtra	1&12	Direct	√	√	√	
16	Sehat- COVID 19 Relief - Oxygen Plant - Uttarakhand	1&12	Direct	√	√	√	

17	Sehat- COVID 19 Relief - Oxygen Plant - Rajasthan	1&12	Direct	√	√	√	
18	Sehat- COVID 19 Relief - Oxygen Plant - Karnataka	1&12	Direct	√	√	√	
19	Sehat- COVID 19 Relief - Oxygen Plant - Gujarat	1&12	Direct	√	√	√	
20	Sehat- COVID 19 Relief - Oxygen Plant - Himachal Pradesh	1&12	Direct	√	√	√	
21	Sehat- COVID 19 Relief - Oxygen Plant - Uttar Pradesh	1&12	Direct	√	√	√	
22	Sehat- COVID 19 Relief - Oxygen Plant - Mahbubnagar, Telangana	1&12	Direct	√	√	√	
23	Sehat- COVID 19 Relief - Oxygen Plant - Zaheerabad, Telangana	1&12	Direct	√	√	√	
24	Sehat- COVID 19 Relief - Oxygen Plant - Bihar	1&12	Direct	√	√	√	
25	Sehat- COVID 19 Relief - Oxygen Plant - Andhra Pradesh	1&12	Direct	√	√	√	
26	Sehat- COVID 19 Relief - Oxygen Plant Civil Work & Electric work- Andhra Pradesh	1&12	Direct	√	√	√	
27	SEHAT- COVID-19 Relief - Oxygen Concentrators - Punjab	1&12	Direct	√			
28	SEHAT- COVID-19 Relief - Oxygen Concentrators - Assam	1&12	Direct		√		
29	SEHAT- COVID-19 Relief - Oxygen Concentrators - Andhra Pradesh	1&12	Direct		√		
30	SEHAT- COVID-19 Relief - Oxygen Concentrators - Telangana	1&12	Direct		√	√	
31	SEHAT- COVID-19 Relief - Food Distribution - Mumbai	1&12	Direct	√			
32	SEHAT- COVID-19 Relief - Food Distribution & protective Gear - Nagpur	1&12	Direct			√	√
33	SEHAT- COVID-19 Relief - Grocery Kit Distribution Mumbai	1&12	Direct	√	√		
34	SEHAT- COVID-19 Relief - Protective Gear Distribution Mumbai	1&12	Direct	√			
35	SEHAT- COVID-19 Relief Upgradation of Hospital Infrastructure - Punjab	1&12	Direct	√	√		
36	SEHAT- COVID-19 Relief - Upgradation of Hospital Infrastructure - Tamil Nadu	1&12	Direct	√			
37	SEHAT- COVID-19 Relief - Oxygen Concentrators - Jaipur	1&12	Direct		√		
38	SEHAT- COVID-19 Relief - Oxygen Tanker Pune	1&12	Implementing Agency			√	
39	SEHAT- COVID-19 Relief - Oxygen Concentrator Karnataka and Uttar Pradesh	1&12	Direct		√	√	

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)