

Corporate Social Responsibility Policy

Mahindra & Mahindra Ltd.

Name of Document	Corporate Social Responsibility Policy
Version	7.0
State whether Policy/Code/ Manual/	Policy
Guideline	
Company Level	Company Level
Issuing Authority	Ruzbeh Irani
Owner of the document	Sheetal Mehta
Effective date of document	1st April 2020
Release Date	1st April 2020
Date of last review	March 2020
Next review date	March 2021
Version History	Please see Annexure 3



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 Vision Statement & Thrust areas:** 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.

All CSR projects will be in line with the CSR vision, as well as areas prescribed in Schedule VII of the Companies Act, 2013 (listed in Annexure 1). CSR projects will be undertaken in India. It will not include the activities undertaken in pursuance of normal course of business of the Company, projects that benefit only the employees of the Company and their families, or contributions of any amount directly or indirectly to any political party. All CSR activities will be in project mode. One-off events such as marathons/ awards/ charitable contribution/ advertisements / sponsorship of TV programmes etc. will not qualify as part of CSR expenditure. The major CSR projects of the Company are listed in Annexure 2.

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 total CSR expenditure in one financial year on building CSR capabilities.

In case there is any unspent amount from the 2% average net profits of the Company made during the 3 immediately preceding financial years, reasons for the same shall be specified in the Board's Report and 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.

5. Governance and Monitoring Process: 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.

<u>Board-level CSR Committee</u> – 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 to be undertaken, the modalities of execution and implementation schedule. The Committee reports to the Company's Board of Directors.

Group CSR Council - The Company has a Group CSR Council which is responsible to implement the projects as per the CSR strategy laid out by the Board level CSR Committee, and monitor the



projects on a timely basis. It will carry out need assessments and impact studies as and when required.

6. Implementation: 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 of the Company and is focused on projects that cater to the local needs of the communities within which they operate.

CSR initiatives will be implemented either directly by the Company through its ESOPs structure where the Mahindra employees will directly implement the CSR projects or through implementing partners which include NGOs (Registered Society, Public Charitable Trust and not for profit established under Section 8 of the Act) having an established track record of at least 3 years in carrying out the specific activity. 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.

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

Mr. Ruzbeh Irani

Reglet & Erani

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 mentioned below -

- 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;
- 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 Biotechnology (DBT), 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)

SI. No.	CSR Programmes	Category under Schedule VII	Implementation Modality	Implementation Schedule		on	
	PROMOTION OF EDUCATION			Q1	Q2	Q3	Q4
1.	Project Nanhi Kali- Education of the girl child	2	TIAI & TIAE	V	V	V	V
2.	Mahindra Scholarship for UWC students	2	TIAI	V	V	V	V
K C Mahindra Scholarship for Post Graduate Studies Abroad		2	TIAI		V		
4.	Shiksha Kendras of Seva Mandir Education Trust	2	TIAE	V	V	V	\square
5.	Mahindra Academy Schools	2	TIAI	V	V	V	V
6.	Gyandeep - Promotion of Education	2	DIR & TIAE	V	V	Ø	$\overline{\mathbf{A}}$
7.	Saarthi Abhiyaan - Scholarships for Girls	2	TIAE	$\overline{\mathbf{A}}$	$\overline{\mathbf{V}}$		$\overline{\checkmark}$
8.	Streetsmart - Road Awareness Programs	1&2	DIR & TIAE	V	V	Ø	$\overline{\mathbf{A}}$
9.	Baja - Project Based Learning	2	TIAE	$\overline{\mathbf{V}}$	$\overline{\mathbf{V}}$	\square	$\overline{\mathbf{V}}$
10.	A WORLD IN MOTION - Project based learning of Mechanical concepts	2	DIR & TIAE	V	V	V	$\overline{\mathbf{A}}$
11.		2	TIAE	V	$\overline{\mathbf{A}}$	V	$\overline{\mathbf{A}}$
12.	J C Mahindra High School, Chincholi	2	TIAI	V	V	V	V
13.	Adarsh Vidyalaya (Reconstruction)	2	TIAE	V	V	Ø	V
	YOUTH SKILLING						
1.	Mahindra Pride Schools and Classrooms	2	TIAI & TIAE	$\overline{\mathbf{A}}$	$\overline{\mathbf{V}}$	$\overline{\Delta}$	$\overline{\checkmark}$
2.	Hunnar - Skill Development training for youth increasing their scope for employability	2 2	DIR & TIAE	Ø	Ø	Ø	Ø
	ENVIRONMENT & RURAL DEVELOPMENT						
1.	Mahindra Hariyali	4	DIR & TIAE	V	V	Ø	$\overline{\mathbf{A}}$
2.	Wardha Farmer Family Project	4	TIAE		$\overline{\mathbf{A}}$	Ø	$\overline{\checkmark}$
3.	Krishi Mitr - Agri Productivity Projects	4	DIR & TIAE	V	V	Ø	$\overline{\mathbf{A}}$
4.	Integrated Watershed Management Programme	10	TIAE	V	V	V	
5.	Gram Vikas - Rural Development Projects (Shiv Jal Kranti)	10	TIAE	V	V	V	V
6.	VSTF-1000 Village programme	10	TIAE	$\overline{\mathbf{A}}$	$\overline{\checkmark}$	$\overline{\mathbf{Q}}$	$\overline{\checkmark}$
7.	VSTF - SMART	10	TIAE	$\overline{\mathbf{A}}$	$\overline{\checkmark}$	$\overline{\mathbf{Q}}$	$\overline{\checkmark}$
8.	IITM Project	9	TIAE	$\overline{\mathbf{A}}$	$\overline{\checkmark}$	$\overline{\mathbf{Q}}$	$\overline{\checkmark}$
9.	Project Prerna	4	DIR & TIAE	V	V	V	V



1)	7			
\sim	-	_	$\boldsymbol{\mathcal{L}}$	
<i>1</i> \		. 7	L .	

10	Mahindra TERI Centre of Excellence	4	TIAE	V	V	V	V
	HEALTH						
1.	Palcare	1	TIAI	V	$\overline{\mathbf{A}}$	$\overline{\mathbf{A}}$	V
2.	Head and Neck Cancer Institute	1	TIAI	V	$\overline{\mathbf{A}}$	$\overline{\mathbf{A}}$	$\overline{\checkmark}$
	(Cancare)						
3.	Sehat - Multi Disciplinary Programs	1	DIR & TIAE	V	V	V	$\overline{\mathbf{V}}$
4.	Swachh Bharat	1	DIR &TIAE	V	$\overline{\mathbf{A}}$	$\overline{\mathbf{A}}$	$\overline{\checkmark}$
5.	Jeevandaan - Blood Donation including	1	DIR	V	$\overline{\mathbf{A}}$	$\overline{\mathbf{A}}$	$\overline{\checkmark}$
	life support for thalassemia patient						
6.	Navdrushti - Eye care & vision corrections	1	DIR & TIAE	V	V	V	
7.	Samantar - Healthcare for the Specially-	1	TIAE	Ø	Ø	V	V
	abled						
8.	Healthcare for patients from Chhindwara	1	TIAI	V	V	V	$\overline{\mathbf{V}}$
9.	Redevelopment of Mata Ramabai	1	TIAE	V	V	V	V
	Ambedkar Worli Smashan Bhumi						
10.	Nutrition Survey	1	TIAE	$\overline{\mathbf{A}}$	$\overline{\mathbf{A}}$	$\overline{\mathbf{A}}$	V

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	1	
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 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