

# Corporate Social Responsibility Policy

Mahindra & Mahindra Ltd.

<b>Name of Document</b>	<b>Corporate Social Responsibility Policy</b>
<b>Version</b>	11
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<b>Issuing Authority</b>	Ruzbeh Irani
<b>Owner of the document</b>	Sheetal Mehta
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<b>Version History</b>	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:**

At Mahindra & Mahindra Ltd. (M&M), CSR is an integral part of the business and is embedded in the Group Philosophy of RISE. Our Core Purpose is to drive positive change in the lives of our communities. Only when we enable others to rise will we rise #TogetherWeRise. Our CSR initiatives focus on creating a more equal world by empowering girls and women as well as contributing to the planet through environment conservation.

In alignment to our Core Purpose, the CSR Mission of M&M is to:-

- Empower Girls
- Empower Women
- Environment Conservation

These focus areas are aligned to the company ESG goals which contribute to nation building.

Apart from investing in the areas of Girls and Women's Empowerment and Environment Conservation, the company also works closely with stakeholders / local communities to support local need-based projects around business locations.

In a nutshell, the company follows a two-pronged CSR strategy: -

1. Flagship Projects: These large-scale projects align to nation building priorities through supporting girls, women and environment conservation.
2. Business Location Projects: These projects are designed to focus on the local developmental needs across all locations of the company.

In order to encourage the spirit of giving back, the Employee Social Options (ESOPs) offers employees and their families an opportunity to engage in volunteering opportunities. As a good practice, Mahindra Volunteering Day is observed across all locations on December 5<sup>th</sup> which coincides with International Volunteering Day.

All CSR projects will be in line with the MCA CSR rules, (within areas as listed in Schedule VII of the Companies Act, 2013).

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

#### 4. Total Outlay:

From April 1<sup>st</sup>, 2014, in line with the Companies Act 2013 (the Act), Mahindra & Mahindra Ltd. commits 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. In addition, eligible projects impact assessment expenses will be incurred within the permissible expenses limit in one financial year.

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:

CSR initiatives will be implemented either directly by the Company through its employees or through implementing partners which are eligible to receive CSR grants as per MCA CSR rules. 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) except for entities established by Central or State government. The above entities should be registered with the MCA by filing the form CSR-1 electronically with the Registrar.

The Company may also collaborate with other companies for undertaking CSR projects, programmes or activities in such a manner that the 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. If required 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.

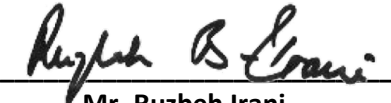
The members of the Board Level CSR Committee are Mr. Muthiah Murugappan (Chairperson & Independent Director), Mr. Anand G. Mahindra (Chairman), Dr. Anish Shah (Managing Director & CEO), Ms. Padmasree Warrior (Independent Director)

### **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 eligible CSR Projects through an independent agency as mandated by CSR rules.

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. (2024-2025)

SR. No	CSR Programmes	Category under Schedule VII	Implementation Modality	Implementation Schedule			
				Q1	Q2	Q3	Q4
	<b>HEALTH</b>						
1	Safe drinking water project- Chincholi	1	Implementing Agency	√	√	√	√
	<b>EDUCATION AND SKILL DEVELOPMENT</b>						
1	Project Nanhi Kali - Education of the girl child	2	Implementing Agency	√	√	√	√
2	Support to JCMM School, Khapoli	2	Implementing Agency	√	√	√	√
3	Mahindra All India Talent Scholarship	2	Implementing Agency	√	√	√	√
4	Mahindra Educational Institutions Project (MEI)	2	Implementing Agency			√	√
5	Mahindra University (MU) Scholarships	2	Implementing Agency			√	√
6	MUWCI Scholarships	2	Implementing Agency	√	√	√	√
7	ITI Auto Skills Project-Centum	2	Implementing Agency		√	√	√
8	ITI Auto Skills Project-LBS	2	Implementing Agency		√	√	√
9	Education and Community trailblazers- ZP Sonave Borichapada School, Palghar	2	Implementing Agency			√	
10	World environment day - Hariyali	2	Direct	√			
11	Educational & Community Trailblazers – Hunnar	2	Direct			√	
12	National Road Safety Week-Street Smart	2	Direct				√
13	Gyandeep- Children's Day	2	Direct			√	
14	AD KCO Rise for Safe Roads – Road Safety Project	2	Implementing Agency	√	√	√	√
15	AD KCO Gyandeep – Promotion of Education Project (Govt. Scholarship)	2	Implementing Agency	√	√	√	√
16	AD KCO Gyandeep – Promotion of Education (Girl Child Scholarship)	2	Implementing Agency			√	√
17	AD Chakan Hunnar – Skill Development Project	2	Implementing Agency		√	√	√
18	AD Kandivali Hunnar – Skill Development Project	2	Implementing Agency		√	√	√
19	AD Nashik 1 Hunnar – Skill Development Project	2	Implementing Agency		√	√	√

20	MRV Hunnar – Skill Development Project	2	Implementing Agency	√	√	√	√
21	AD Chakan Engine Hunnar – Skill Development Project	2	Implementing Agency		√	√	√
22	AD SBU Hunnar – Skill Development Project (Jaipur)	2	Implementing Agency	√	√	√	√
23	AD Bangalore Hunnar – Skill Development Project	2	Implementing Agency	√	√	√	√
24	MTBD Gyandeep – Mahindra Saarthi Abhiyaan (Girl Child Scholarship)	2	Implementing Agency		√	√	√
25	AD S&CO Hunnar – Skill Development Project	2	Implementing Agency	√	√	√	√
26	FD Kandivali Gyandeep – Promotion of Education Project	2	Implementing Agency		√	√	√
27	FD Nagpur Hunnar – Skill Development Project	2	Implementing Agency	√	√	√	√
28	FD Jaipur Hunnar – Skill Development Project	2	Implementing Agency		√	√	√
29	FD Zaheerabad Hunnar – Skill Development Project	2	Implementing Agency			√	√
30	MTWD Hunnar – Skill Development Project	2	Implementing Agency		√	√	√
31	FD S&CO Gyandeep – Promotion of Education Project (Scholarship)	2	Implementing Agency		√	√	√
32	Powerol Hunnar – Skill Development Project	2	Implementing Agency	√	√	√	√
33	Swaraj Hunnar – Skill Development Project	2	Implementing Agency	√	√	√	√
34	Swaraj Gyandeep – Promotion of Education Project	2	Implementing Agency	√	√	√	√
	<b>WOMEN EMPOWERMENT</b>						
1	Kaabil- Women empowerment through Mahindra Pride Project	3	Implementing Agency	√	√	√	√
2	Kaabil- Women empowerment through Farm Skilling Project	3	Implementing Agency		√	√	√
3	Kaabil- Women empowerment in Apparel Sector	3	Implementing Agency		√	√	√
4	Kaabil -Women empowerment in Health Care/ Retail and EET	3	Implementing Agency		√	√	√
5	Kaabil -Women empowerment through entrepreneurship development	3	Implementing Agency	√	√	√	√
6	Swalambhi Women Empowerment Project	3	Implementing Agency			√	
7	AD SBU Prerna - Women Empowerment Project (Kanche)	3	Implementing Agency	√	√	√	√
8	FD Nagpur Prerna – Women Empowerment Project	3	Implementing Agency	√	√	√	√
9	FD Rudrapur Prerna – Women Empowerment Project	3	Implementing Agency		√	√	√

10	Krish E Prerna – Crop Diversification Project (Telangana)	3	Implementing Agency	√	√	√	√
11	Krish E Prerna – Crop Diversification Project (Madhya Pradesh)	3	Implementing Agency	√	√	√	√
12	Swaraj Prerna - Women Empowerment Project	3	Implementing Agency	√	√	√	√
	<b>ENVIRONMENT &amp; NATURAL RESOURCE MANAGEMENT</b>						
1	Araku Hariyali maintenance F23	4	Implementing Agency	√	√	√	√
2	Araku Hariyali maintenance F24	4	Implementing Agency	√	√	√	√
3	Northern India Hariyali maintenance F23	4	Implementing Agency	√	√	√	√
4	Northern India Hariyali maintenance F24	4	Implementing Agency	√	√	√	√
5	Bamboo Plantation maintenance F24	4	Implementing Agency	√	√	√	√
6	Education and Community trailblazers – Swachh Bharat	4	Direct		√		
7	AD KCO Jal Samriddhi – Water Management Project (4 - WDF)	4	Implementing Agency	√	√	√	√
8	AD KCO Jal Samriddhi – Water Management Project (6 - WDF)	4	Implementing Agency	√	√	√	√
9	AD KCO Jal Samriddhi – Water Management Project (Rajasthan)	4	Implementing Agency				√
10	AD Chakan Jal Samriddhi – Water Management Project	4	Implementing Agency	√	√	√	√
11	AD Igatpuri Jal Samriddhi – Water Management Project	4	Implementing Agency	√	√	√	√
12	AD Nashik 1 Jal Samriddhi – Water Management Project	4	Implementing Agency		√	√	√
13	AD Nashik 2 Jal Samriddhi – Water Management Project	4	Implementing Agency		√	√	√
14	MRV Jal Samriddhi – Water Management Project	4	Implementing Agency	√	√	√	√
15	Swaraj Jal Samriddhi – Water Management Project (Mohali)	4	Implementing Agency	√	√	√	√
16	Swaraj Jal Samriddhi – Water Management Project (Rajasthan)	4	Implementing Agency	√	√	√	√
17	Swaraj Jal Samriddhi – Water Management Project (MP)	4	Implementing Agency	√	√	√	√
	<b>RURAL DEVELOPMENT</b>						
1	AD Zaheerabad Ekakrit Vikas – Integrated Development Project	10	Implementing Agency	√	√	√	√
2	AD Haridwar Ekakrit Vikas – Integrated Development Project	10	Implementing Agency	√	√	√	√
3	AD Chakan Engine Ekakrit Vikas – Integrated Development Project	10	Implementing Agency		√	√	√

4	FD Jaipur Ekakrit Vikas – Integrated Development Project	10	Implementing Agency	√	√	√	√
5	FD Zaheerabad Ekakrit Vikas – Integrated Development Project	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 <sup>th</sup> August 2014 & 24 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> May, 2019
7.0	Sheetal Mehta	Updation of Annexure 1 – List of CSR Projects (2019-20) & Amendment in the Schedule VII of the Companies Act 2013 as per notifications from MCA dated 11 <sup>th</sup> October, 2019
8.0	Sheetal Mehta	Updation as per Companies (Corporate Social Responsibility Policy) Amendment Rules 2021
8.1	Sheetal Mehta	Updating of Annexure 1 – List of CSR Projects (2021-22)
8.2	Sheetal Mehta	Updating of Annexure 1 – List of CSR Projects (2021-22)
9.0	Sheetal Mehta	Updating of Annexure 1 – List of CSR Projects (2022-23)
10.0	Sheetal Mehta	Updating of Annexure 1 – List of CSR Projects (2023-24)
11.0	Sheetal Mehta	Updating of Annexure 1 – List of CSR Projects (2024-25)