

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction and Background

Mahindra Intertrade Limited (MIL) is committed to be a socially responsible corporate citizen and believes that corporate social responsibility is a key business process for sustainable development.

MIL pledges to commit 2% of its average net profits of the immediately preceding three years (calculated as per guidelines of Section 198 of the Companies Act, 2013) towards CSR initiatives specifically for the benefit of economically and socially disadvantaged sections of society, 50% of which will be assigned to areas contiguous to its service centres, and the balance to the K C Mahindra Education Trust for group-level CSR initiatives.

2. CSR and the Mahindra Group

Mahindra group has always gone beyond legal and statutory requirements to make responsible investments in the community. Over the past few years, Mahindra group has focused its CSR efforts in a number of areas, notably, but not limited to:

- **Scholarships and grants**
- **Nanhi Kali**
- **Mahindra Pride Schools**
- **Lifeline Express**
- **Project Hariyali**
- **Watershed management**
- **Disaster relief and rehabilitation**

In keeping with the group's RISE philosophy, the Company commits itself to driving positive change to enable people and communities to RISE above their limiting circumstances.

3. Objectives of the CSR Policy

The objectives of this policy are:

- Promoting a unified and strategic approach to CSR by incorporating all initiatives under the 'RISE for Good' umbrella, and identifying select constituencies and causes to work with, thereby ensuring high social impact.
- Ensuring increased commitment at all levels in the organisation by encouraging employees to participate in the Company's CSR activities and giving back to society through the employee volunteering program called ESOPs.

4. Scope and Applicability

This policy shall be applicable to Mahindra Intertrade Ltd., and its subsidiaries (latter where applicable).

5. Policy Statement

5.1 CSR Vision Statement & Ideology

Our 'Core Purpose' is to "challenge conventional thinking and innovatively use all our resources to drive positive change in the lives of our stakeholders and communities across the world to enable them to RISE. In line with our Core Purpose, our CSR Vision is to focus our efforts within the constituencies of girls, youth and farmers by innovatively supporting them through programs 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.

Responsible business practices include being responsible for our business processes, products, engaging in responsible relations with employees, customers and the community. Hence, for the Company, Corporate Social Responsibility goes beyond just adhering to statutory and legal compliance to creating social and environmental value for our key stakeholders.

5.2. Outlay

In line with Companies Act, 2013 ('Act'), Mahindra Intertrade Ltd., and its subsidiaries (latter where applicable), pledges to contribute at least 2% of its average net profits during the three 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.

5.3 CSR Thrust Areas

The Company will focus its efforts within the constituencies of girls, youth and farmers through programs designed in the domains of education, health and environment. The Company may also make contributions to the group's corporate foundations/trusts, i.e., K C Mahindra Education Trust and Mahindra Foundation, for projects approved by the Board.

Our commitment to CSR will be manifested by investing resources in any of the following areas -

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care, sanitation, including contribution to the Swach Bharat Kosh set up by the Central Government for the promotion of sanitation, and making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects;
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres, and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining the quality of soil, air and water, including contribution to the Clean Ganga Fund set up by the Central Government for rejuvenation of river Ganga;
5. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up of public libraries; promotion and development of traditional arts and handicrafts;

6. Measures for the benefit of armed forces veterans, war widows and their dependents;
7. Training to promote rural sports, nationally recognized sports, paraolympic sports and 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 and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
9. Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
10. Rural development projects;
11. Slum area development;
12. Such other activities as may be notified in future by the Central Government.

5.4 Implementation

The Board level Corporate Social Responsibility Committee (CSR Committee) of the Company shall be responsible for monitoring implementation of the CSR Policy. CSR Committee shall approve and recommend to the Board projects or programs to be undertaken, the modalities of execution, and implementation schedule thereof.

5.5 Monitoring process of CSR activities

It will be the responsibility of the operating management to review the progress of various CSR projects in terms of outcome. Operating management will mandate the effective and timely monitoring and evaluation of CSR projects by directing a third party independent agency to carry out situational analysis, need assessment surveys, project visits, or impact studies, etc, if and as required, for strategic and high value CSR programs.

In order to ensure transparency and communication with all stakeholders, the CSR Policy will be uploaded on the Company website so that it is available in the public domain.

5.6 Executing Agency / Partners

CSR initiatives will be implemented either directly by the Company through its ESOPs program where employees may directly implement CSR initiatives, or through implementing partners which include NGOs having an established track record of at least 3 years in carrying out the specific activity. The main implementation partners the Company will work with are the Company's corporate foundations, namely, Mahindra Foundation, K C Mahindra Education Trust, Tech Mahindra Foundation and Naandi Foundation.

The following minimum criteria will be ensured while selecting NGOs / voluntary organizations for program execution:

- a) The NGO is a registered Society / Public Charitable Trust / Section 25 Not for Profit Organization / Company established under section 8 of the Act
- b) The NGO has a permanent office / address in India
- c) The NGO has a valid Income Tax Exemption Certificate
- d) The NGO has submitted a detailed project proposal and budget which has been approved by the Company.

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

6th May, 2015