

CORPORATE SOCIAL RESPONSIBILITY POLICY

Mahindra Susten Private Limited was formed in September 2010 as a 100% subsidiary of Mahindra & Mahindra Limited (M&M). Susten is in the business of providing Engineering, Procurement and Construction services for setting up solar power plants. Susten has also recently diversified Green Factory Building and Automation services. SUSTEN is head quartered in Mumbai and has project sites across the country.

We as an organization are committed towards inclusive growth of our stakeholders namely customers, investors, suppliers, employees, environment and community. All our initiatives are planned based on the need assessment of the location and aimed with the approach of empowering communities. It is known that most of our solar utility sites are located in the remotest of locations deprived of any social, economic or educational support systems.

We have always believed in including the local community at multiple levels. Providing them job opportunities, training or imparting them right skill sets for their continued employability, restoring the environment and contributing towards community infrastructure are few of the initiatives championed by SUSTEN in the past.

2. CSR Vision Statement and Objective

a. The CSR vision of SUSTEN is to deliver maximum value to all our stakeholders working harmoniously with local and global communities

b. The **objective** of this policy is to –

The CSR Policy, formulated in alignment with the Mission and Vision of the Company, lays down guidelines and mechanisms to be adopted by the Company in order to carry out CSR Projects / Programs.

All CSR Projects / Programs will be conceived and implemented through a focused approach towards target beneficiaries for generating maximum impact.

CSR Projects / Programs of the Company may be carried out in partnership with credible implementing agencies.

c. Scope and Applicability

This policy shall be applicable to all stakeholders and employees of SUSTEN.



4. Policy Statement

a. Core Ideology

For SUSTEN, responsible business practices include being responsible for our business processes, services, 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 compliances, and creates social and environmental value.

This is clearly articulated in the redefined Core Purpose which reads as “we will 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”.

b. Total Outlay

From April 1st, 2014 in line with the new Companies Act 2013, SUSTEN pledges 2% average net profits made during the 3 immediately preceding financial years specifically towards CSR initiatives.

c. Allocation of Resources & Thrust Areas –

The SUSTEN CSR Committee will manage 2% of the average net profits made during the three immediately preceding financial years to undertake CSR initiatives which meet the needs of the local communities where we operate.

Our commitment to CSR will be manifested by investing resources in the following areas –

- a. Rural Infrastructure Development
- b. Education
- c. Health
- d. Empowering Women/Senior Citizens/Socially and economically backward class
- e. Environment
- f. Vocational Training and Livelihood Enhancement

The surplus arising out of the CSR activities will not be considered as a part of the business profits of the company.

d. CSR Committee

The SUSTEN CSR Committee chaired by Mr. AKT Chari, Mr. K Chandrashekar and Mr. Satish Kamat will monitor the implementation every quarter through the CSR Executive Council chaired by Mr. Basant Jain, Chief Executive Officer and comprising of other members – Mr. Venkat Ram, Mr. Pramod Deore, Ms. Himani Kumar, Mr. Roshan Gandhi, Col Dileep Nair, Mr. Sandeep Jadhav and Mr. Ankit Jain.

The CSR Executive Council will support the CSR Committee in undertaking strategic decisions with respect to CSR for SUSTEN. The CSR Executive Council will be supported by the CSR Working Group, whose key responsibility is to monitor the CSR projects undertaken by SUSTEN and ensure their smooth implementation. There will location champions to assist the working group at ground level.

e. Executing Agency / Partners

CSR initiatives will be undertaken either through, the company's own CSR committee or consultant with the active involvement of employees under ESOPs (Employee Social Options) which is the employees volunteering program or through partnerships with our Corporate Foundations namely the Mahindra Foundation, The K C Mahindra Education Trust or through partnerships with other NGOs having an established track record .

The following minimum criteria will be ensured while selecting NGO's / voluntary organizations for programme execution

- The NGO is a registered Society / Public Charitable Trust
- The NGO has a permanent office / address in India
- The NGO has a valid Income Tax Exemption Certificate

The NGO has submitted a detailed project proposal and budget which has been approved by the CSR Committee.

f. Monitoring Mechanism

SUSTEN has instituted a robust and transparent monitoring mechanism to oversee and track the implementation of its CSR projects. All CSR projects will be evaluated against the milestones defined in the implementation plan of the project

The CSR Council will be responsible for ensuring that all CSR projects are monitored in a systematic manner. The CSR Council will convene quarterly to review to update the CSR Committee about

- The progress of the project with respect to its targets and outputs
- The manner in which the funds allocated for the project are being utilized

The CSR Council may also conduct needs analysis, situational analysis, social audits and impact studies of projects through the implementing agency or an independent third party agency if required.

g. Reporting and Communication

In order to ensure transparency and communication with all stakeholders, the CSR Council will document the details of the Company's CSR initiatives and CSR expenditure and ensure that the same are available in the public domain i.e. the Directors' Report of the Company's Annual report and/or on the company's website.

h. Treatment of Surplus

Any surplus generated from CSR projects undertaken by SUSTEN will be tracked and channelized into the company's CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the company's business profits.



Basant Jain

Chief Executive Officer

