

CORPORATE SOCIAL RESPONSIBILITY

ANNUAL ACTION PLAN & CSR BUDGET FOR FY 2025-26

[Pursuant to rule 5(2) of the Companies (Corporate Social Responsibility Policy) Rules, 2014]

The Company's CSR policy and initiatives outline the vision, mission, focus areas and key requirements as per Schedule VII read with Section 135 of the Companies Act, 2013 (the 'Act') and the Companies (Corporate Social Responsibility Policy) Rules, 2014. The Company will implement these initiatives through its implementing agency namely Apco CSR Foundation unless otherwise decided and approved by the CSR Committee/ Board.

Apco CSR Trust is a Trust registered under the Indian Trust Act, 1882 with Section 12A and Section 80G registrations under the Income Tax Act, 1961 and established by Apco Infratech Private Limited. Its Registered office is situated at B-9, Vibhuti Khand, Gomti Nagar, Lucknow 226010, Uttar Pradesh. The Trust has been registered with the Ministry of Corporate Affairs, Government of India for undertaking CSR activities with CSR Registration number CSR00009882. The Trust has been entrusted with the responsibility to utilize the funds received from the Company, to execute the CSR Project activities as per the Annual Action Plan in pursuance of the CSR Policy of the Company.

As per the sub-rule (2) of rule 5 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, the CSR Committee has formulated and recommended to the Board, an Annual Action Plan and Budget for the financial year 2025-26, in pursuance of the CSR Policy of the Company, which includes the following:

A. The list of CSR Projects or Programmes proposed to be undertaken by the Company, through it implementing agency, in the areas or subjects specified in Schedule VII of the Act and the manner of their execution is as follows:

S. No.	Focus Area / Activity as per Schedule VII	Project Name	Location	Brief about the Project
1.	(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.	Promoting Education	Faizabad, Uttar Pradesh	Aims to provide education to the underprivileged section of the society especially children and women through Apco CSR Trust.

B. The modalities of utilization of funds and implementation schedules for the projects or programmes:

MODALITIES OF UTILIZATION OF FUNDS	
1	The CSR Budget for FY 2025-26 has been ascertained as Rs. ____Crores amounting to 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of its Corporate Social Responsibility Policy.
2	The Committee may deviate from the budgetary allocated amount, which shall not exceed 10% of the total allocated amount, for that particular CSR Project.
3	The administrative overheads shall not exceed 5% of the total CSR Expenditure of the Company for the Financial Year.
4	The CSR budget will be spent on CSR activities as enumerated in this Plan, which is approved by the Board on the recommendation of the CSR Committee.
5	Fund will be disbursed in one or more tranches during the financial year, depending on the nature and requirement of the project
6	Wherever necessary, the Company may ask the implementation agency(ies) to provide the CSR Utilization Certificate.

IMPLEMENTATION OF PROJECT	
	The CSR Projects will be implemented by the Apco CSR Trust unless specifically approved by the Board/CSR Committee to be undertaken by any other CSR Implementing Agency.
	The Board shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the person responsible for financial management shall certify to the effect.
	In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and may make modifications, if any, for smooth implementation of the project within the overall permissible time period.
	Apco CSR Trust may collaborate with any other CSR Implementing Agency depending upon the requirement of the Project, after conducting necessary due diligence.

C. The monitoring and reporting mechanism for the projects or programmes:

MONITORING AND REPORTING MECHANISM	
	All the projects will be monitored & evaluated from time to time
	The CSR projects will be monitored regularly through field visits, monthly reporting, communication with the stakeholders, etc.
	The Implementing Agency will provide regular updates regarding the CSR Project undertaken by it.

D. The details of need and impact assessment, if any, for the projects undertaken by the company (if applicable):

CSR Impact Assessment was applicable to the Company for the financial year 2025-2026 pursuant to Section 135 of the Companies Act, 2013 read with Rule 8(3)(a) of the Companies (Corporate Social Responsibility Policy) Rules, 2014. Accordingly, an Impact Assessment was undertaken by the Company through an independent agency of their CSR projects having outlays of Rupees one crore or more, completed during the FY 2024-25. The Impact Assessment Report has been annexed to the Annual Report on CSR activities of the Company for the FY 2025-26.

E. CSR Budget for the financial year 2025-26

- Average net profit of the Company as per Section 135(5): Rs. 670.52 Crores
- Two percent of average net profit of the company as per section 135(5): Rs. 13.41Crores
- Amount required to be set off for the financial year, if any: Nil
- Total CSR obligation for the financial year: Rs. 13.41 Crores
- Amount to be spent in Administrative overheads: up to 5% of the total CSR Expenditure
- Amount to be spent on Impact Assessment: Up to Rs. 50,000/-
- Total Amount of CSR Expenditure recommended: Rs. Nil

The above CSR Annual Action Plan & CSR Budget for FY 2025-26, was recommended by the CSR Committee to the Board and was approved by the Board as its meeting held on 06.05.2025