

Procurement Policy

PUPPETS PICTURE EDUCATION TRUST

Registered Office: Plot No – M10, M block, Sector – 11, Near Metro Heart Hospital, Noida, 201301

Date of Adoption: 1-Dec-2015

Resolution No.: 7

1. Preamble

Puppets Picture Education Trust (“the Trust”) is a public charitable trust registered under the Indian Trusts Act, 1882, governed by a Board of Trustees comprising Mr. Rahul Chakraborty and Mr. Arun Chakraborty. The Trust undertakes educational and social-development programmes and receives funds from donations, grants, corporate social responsibility (CSR) contributions, and potentially foreign contributions regulated under the Foreign Contribution (Regulation) Act, 2010 (FCRA). This Procurement Policy establishes a framework to ensure that all purchasing activities are conducted with transparency, fairness, integrity, efficiency, and value for money, while safeguarding the Trust’s resources against fraud, waste, and misuse. It shall be read alongside the Trust’s Anti-Fraud & Anti-Corruption Policy, Conflict of Interest Policy, Safeguarding Policy, and Child Protection Policy.

2. Objective

The objectives of this policy are to ensure that all procurement of goods, services, and works is carried out through a fair, competitive, and transparent process; that the Trust obtains the best value for money without compromising quality; that procurement decisions comply with applicable Indian laws (including the Income-Tax Act, 1961, FCRA 2010, GST Act, and any donor or government grant conditions); that all procurements are properly authorised, documented, and auditable; and that conflicts of interest, fraud, bribery, and corruption in procurement are prevented.

3. Scope

This policy applies to all procurement activities undertaken by or on behalf of the Trust, including the purchase of goods (stationery, furniture, equipment, educational materials, food

supplies, IT hardware and software, etc.), engagement of services (consultancy, audit, legal, IT, transport, event management, catering, etc.), execution of works (construction, renovation, maintenance, etc.), and lease or hire of assets or venues. It applies to all Representatives of the Trust — trustees, employees, volunteers, consultants, and any person authorised to make purchases or commitments on behalf of the Trust — regardless of the funding source.

4. Guiding Principles

4.1 Transparency. All procurement processes shall be open, clearly documented, and available for internal and external audit.

4.2 Fairness & Equal Opportunity. All eligible suppliers shall have an equal opportunity to participate. No supplier shall be favoured or discriminated against on any ground other than merit, quality, and price.

4.3 Integrity & Anti-Corruption. No trustee, employee, or representative shall accept or offer any gift, commission, kickback, or inducement in connection with procurement. The Anti-Fraud & Anti-Corruption Policy applies in full.

4.4 Value for Money. Procurement decisions shall optimise the balance between price, quality, reliability, delivery time, and after-sales support over the useful life of the item or service.

4.5 Conflict of Interest. Any person involved in a procurement decision who has a personal, financial, or familial interest in a prospective supplier must disclose the interest and recuse themselves. The Conflict of Interest Policy applies in full. In particular, no procurement shall be made from Puppets Picture Pvt Ltd or any entity in which Mr. Rahul Chakraborty, Mr. Arun Chakraborty, or their relatives (as defined in Section 13(3) of the Income-Tax Act, 1961) hold a substantial interest, unless the transaction is demonstrably at arm's length, approved solely by the disinterested Trustee, and disclosed in the annual audit report.

4.6 Sustainability. Where practicable, the Trust shall prefer environmentally sustainable, locally sourced, and ethically produced goods and services.

4.7 Compliance. All procurements shall comply with applicable tax laws (GST, TDS), FCRA utilisation conditions (if foreign contributions are used), donor-specific procurement guidelines, and any other regulatory requirements.

5. Roles and Responsibilities

5.1 Board of Trustees (Mr. Rahul Chakraborty & Mr. Arun Chakraborty). The Board holds overall responsibility for this policy: approving the policy and amendments, approving procurements above ₹1,00,000, appointing the Procurement Officer, and reviewing procurement reports at least annually.

5.2 Procurement Officer (to be designated). The Procurement Officer is the person appointed by the Board (may be a staff member or one of the Trustees for smaller organisations) to manage the day-to-day procurement process: receiving purchase requisitions, verifying budget availability, obtaining quotations, maintaining the Purchase Register and vendor records, ensuring compliance with this policy, and reporting to the Board.

5.3 Programme Coordinators / Requisitioning Staff. Responsible for identifying procurement needs, preparing Purchase Requisition Forms with clear specifications, confirming budget availability with the Procurement Officer, and receiving and inspecting delivered goods or services.

5.4 Accounts / Finance Function. Responsible for verifying invoices against purchase orders and delivery receipts, processing payments (with proper TDS deduction and GST compliance), maintaining procurement-related financial records, and flagging any discrepancies.

5.5 Vendors and Suppliers. Expected to provide truthful quotations, comply with agreed terms, deliver quality goods/services on time, and refrain from offering gifts or inducements to Trust personnel.

6. Procurement Methods & Financial Thresholds

The procurement method depends on the estimated cost of the purchase:

6.1 Petty / Micro Purchases — up to ₹5,000. A single quotation is sufficient. The purchase may be made from the petty-cash fund by any authorised person. A receipt or cash memo must be obtained and attached to the petty-cash voucher. No Purchase Requisition Form is required, but the expense must be recorded in the Petty Cash Register.

6.2 Small Purchases — above ₹5,000 and up to ₹25,000. A minimum of two written or telephonic quotations (recorded in writing) must be obtained. A Purchase Requisition Form must be filled, approved by the Procurement Officer, and filed. The supplier offering the best value for money shall be selected.

6.3 Standard Purchases — above ₹25,000 and up to ₹1,00,000. A minimum of three written quotations from independent suppliers must be obtained. A Comparative Statement (Quotation Analysis Sheet) must be prepared. Approval of the Procurement

Officer and one Trustee is required. If the lowest quotation is not selected, the written reasons must be documented.

6.4 Major Purchases — above ₹1,00,000. A minimum of three written quotations is mandatory; for purchases above ₹5,00,000 a formal Request for Proposal (RFP) or tender process is recommended. A Comparative Statement must be prepared and presented to the Board. Approval of both Trustees (Board resolution) is required. A written purchase order or contract must be issued.

6.5 Emergency Purchases. In case of genuine emergency (e.g., urgent repair, event-related need, child safety requirement), the Procurement Officer or any Trustee may authorise a purchase without following the standard quotation process. The emergency must be documented in writing within 48 hours, ratified by the Board at its next meeting, and recorded in the minutes.

6.6 Sole-Source / Single-Source Procurement. Where only one supplier can provide the required goods or services (proprietary item, specialised service, warranty requirement), a sole-source procurement is permissible. A written justification must be documented and approved by the Board for amounts above ₹25,000.

6.7 Recurring / Annual Contracts. For frequently required goods or services (e.g., stationery, printing, transport, housekeeping), the Trust may enter into rate contracts or empanelment arrangements after competitive selection. These agreements shall be reviewed annually.

7. Procurement Process — Step by Step

Step 1 — Need Identification & Requisition. The requisitioner identifies the need, checks the approved budget, and fills in a Purchase Requisition Form (Annexure A) with item description, quantity, specifications, estimated cost, budget head, and required delivery date.

Step 2 — Verification & Budget Check. The Procurement Officer verifies the requisition, confirms budget availability with the Accounts function, and determines the applicable procurement method per the thresholds in Section 6.

Step 3 — Sourcing & Quotation. Quotations are invited from approved vendors or the open market as required. For telephonic quotations, the name, contact, and quoted amount must be noted. For written quotations, originals or email printouts are filed. Quotations should be valid for at least 30 days.

Step 4 — Comparative Evaluation. A Comparative Statement (Annexure B) is prepared listing all quotations received, comparing price, quality, warranty, delivery terms, and past performance. The recommended supplier is identified with reasons.

Step 5 — Approval. The Comparative Statement and recommendation are forwarded for approval as per Section 6. For purchases above ₹1,00,000, a Board resolution is recorded.

Step 6 — Purchase Order / Contract. A Purchase Order (Annexure C) or service contract is issued to the selected supplier, clearly stating: item/service description, quantity, unit and total price (inclusive of GST), delivery date, payment terms (normally after delivery and inspection), warranty/guarantee terms, penalty for delay (if applicable), and the Trust's right to reject sub-standard delivery.

Step 7 — Receipt & Inspection. On delivery, the requisitioner and/or Procurement Officer inspect the goods or services against the purchase order. A Goods Received Note (GRN) or Service Completion Certificate (Annexure D) is prepared. Any shortages, damages, or quality issues are noted and reported to the supplier immediately.

Step 8 — Payment. The Accounts function processes payment only upon receipt of a matching set of documents: approved Purchase Requisition, Purchase Order, Supplier Invoice, and GRN/Completion Certificate. TDS is deducted as applicable. Payments are made preferably by cheque or electronic transfer with dual authorisation.

Step 9 — Recording. Every procurement is entered in the Purchase Register (Annexure E) with date, vendor, description, amount, invoice and cheque/transaction reference. Capital items are also entered in the Fixed Asset Register.

8. Vendor Management

8.1 Approved Vendor List. The Trust shall maintain an Approved Vendor List, updated annually. To be empanelled, a vendor must provide valid GSTIN (where applicable), PAN, bank details, and a declaration that the vendor is not related to any Trustee or specified person under Section 13(3) of the Income-Tax Act.

8.2 Vendor Evaluation. Vendors shall be evaluated annually on quality, price competitiveness, timely delivery, and responsiveness. Underperforming vendors shall be removed from the list.

8.3 Related-Party Vendors. Consistent with the Trust's Conflict of Interest Policy, no procurement shall be made from any entity owned by, controlled by, or substantially connected to a Trustee, their relatives, or any specified person under Section 13(3) unless: (a) it is demonstrably in the Trust's best interest; (b) it is at arm's length; (c) the interested Trustee recuses from the decision; (d) it is approved by a disinterested Trustee; and (e) it is disclosed in the annual audit report (Form 10B/10BB). Given the Trust's declared zero-transaction policy with Puppets Picture Pvt Ltd, no procurement from that entity shall be made.

8.4 Blacklisting. A vendor may be blacklisted for fraud, bribery, persistent quality failures, or legal non-compliance. Blacklisting is decided by the Board and recorded in the minutes.

9. Specific Compliance Requirements

9.1 Income-Tax Act. TDS shall be deducted at source on all eligible payments (e.g., professional fees, rent, contract payments) as per applicable rates. All vendor payments above ₹50,000 (or as prescribed) shall be by account-payee cheque or electronic transfer.

9.2 Goods and Services Tax (GST). The Trust shall ensure that it obtains GST-compliant invoices from registered vendors, claims input tax credit where eligible, and files returns on time.

9.3 FCRA. If foreign contributions are used for procurement, the purchase must be consistent with the purpose for which the foreign contribution was received. Records of such utilisation must be maintained separately. No foreign contribution shall be used to procure goods or services from entities linked to Trustees.

9.4 Donor / Grant-Specific Conditions. Where a donor or grant-maker imposes specific procurement guidelines (e.g., CSR funding requiring competitive bidding above a certain threshold), those conditions shall be complied with, and if they are more restrictive than this policy, the donor's conditions shall prevail.

10. Documentation & Record Retention

All procurement documents — requisitions, quotations, comparative statements, purchase orders, contracts, invoices, GRNs, payment records, board resolutions, and correspondence — shall be maintained in an organised filing system (physical and/or digital) for a minimum period of 8 years from the date of the transaction or such longer period as required by the Income-Tax Act, FCRA, or any applicable law.

11. Fraud Prevention & Reporting

Any suspected fraud, bribery, kickback, or irregularity in procurement must be reported immediately in accordance with the Trust's Anti-Fraud & Anti-Corruption Policy. Suspected irregularities include fictitious vendors, inflated invoices, split purchases to circumvent thresholds, acceptance of gifts by staff, and bid rigging. Whistle-blower protection as laid out in the Anti-Fraud & Anti-Corruption Policy applies.

12. Training

All persons involved in procurement shall receive an orientation on this policy within 15 days of their involvement and shall sign an acknowledgment. A refresher shall be conducted annually.

13. Review & Amendment

This policy shall be reviewed by the Board at least once every year. Any amendments shall be approved by Board resolution and communicated to all relevant persons. The policy shall also be reviewed whenever there is a significant change in the Trust's operations, funding sources, or applicable law.

14. Effective Date

This Procurement Policy shall come into effect from 1-Dec-2015 and supersedes any previous procurement practices, guidelines, or understandings.

Mr. Rahul Chakraborty
Trustee
Puppets Picture Education Trust

Date: 1-Dec-2015

Signature: 

Mr. Arun Chakraborty
Trustee
Puppets Picture Education Trust

Date: 1-Dec-2015

Signature: 

ANNEXURE A — PURCHASE REQUISITION FORM

Puppets Picture Education Trust

Field	Details
Requisition No.	
Date	
Requisitioner Name	
Designation / Role	
Programme / Project Name	
Budget Head	

Item Details:

S. No.	Item / Service Description	Specifications	Quantity	Unit	Estimated Unit Cost (₹)	Estimated Total Cost (₹)
1						
2						
3						
4						
5						
Total Estimated Cost						₹

Field

Details

Required Delivery Date

Justification / Purpose of Purchase

Preferred Vendor (if any)

Any Special Instructions

Approvals:

Authority	Name	Signature	Date	Remarks
Requisitioner				
Budget Confirmed (Accounts)				<input type="checkbox"/> Yes <input type="checkbox"/> No
Procurement Officer				<input type="checkbox"/> Approved <input type="checkbox"/> Rejected
Trustee (if required per threshold)				<input type="checkbox"/> Approved <input type="checkbox"/> Rejected

ANNEXURE B — COMPARATIVE STATEMENT (QUOTATION ANALYSIS SHEET)

Puppets Picture Education Trust

Field	Details
Comparative Statement No.	
Date Prepared	
Requisition No. (Ref.)	
Item / Service Description	
Specifications	
Quantity Required	
Date Quotations Invited	
Mode of Invitation	<input type="checkbox"/> Written <input type="checkbox"/> Email <input type="checkbox"/> Telephonic

Quotation Comparison:

Parameter	Vendor 1	Vendor 2	Vendor 3
Vendor Name			
Address			
GSTIN			
PAN			
Quotation Date			
Quotation Reference No.			
Unit Price (₹)			
GST Amount (₹)			
Total Price incl. GST (₹)			
Delivery Period			

Parameter	Vendor 1	Vendor 2	Vendor 3
Warranty / Guarantee			
Payment Terms			
Past Performance Rating	<input type="checkbox"/> Good <input type="checkbox"/> Average <input type="checkbox"/> New	<input type="checkbox"/> Good <input type="checkbox"/> Average <input type="checkbox"/> New	<input type="checkbox"/> Good <input type="checkbox"/> Average <input type="checkbox"/> New
Other Remarks			

Recommendation:

Field	Details
Recommended Vendor	
Reason for Selection	
If lowest bid NOT selected, reason	
Related to any Trustee / Specified Person?	<input type="checkbox"/> No <input type="checkbox"/> Yes (details: ____)

Approvals:

Authority	Name	Signature	Date
Prepared By (Procurement Officer)			
Reviewed By			
Approved By (Trustee / Board)			

ANNEXURE C — PURCHASE ORDER

Puppets Picture Education Trust
 [Trust Address, Phone, Email, PAN, GSTIN]

Field	Details
Purchase Order No.	
Date	
Requisition Ref. No.	
Comparative Statement Ref. No.	

Vendor Details:

Field	Details
Vendor Name	
Address	

Field	Details
Contact Person	
Phone / Email	
GSTIN	
PAN	

Order Details:

S. No.	Item / Service Description	Specifications	Quantity	Unit	Unit Price (₹)	GST Rate (%)	GST Amount (₹)	Total Amount (₹)
1								
2								
3								
4								
5								
					Sub-Total			₹
					Total GST			₹
					Grand Total			₹

Terms & Conditions:

Parameter	Details
Delivery Date	
Delivery Location	
Payment Terms	
Warranty / Guarantee Period	
Penalty for Late Delivery	
TDS Deduction (if applicable)	<input type="checkbox"/> Yes — Rate: ___% <input type="checkbox"/> Not applicable
Quality Inspection	Goods/services subject to inspection before acceptance
Right to Reject	Trust reserves the right to reject sub-standard delivery
Governing Law	Laws of India; Courts at Gautam Buddh Nagar, Noida

Authorised Signatory:

For Puppets Picture Education Trust	Acknowledged by Vendor
Name:	Name:

For Puppets Picture Education Trust	Acknowledged by Vendor
Designation:	Designation:
Signature:	Signature & Stamp:
Date:	Date:

ANNEXURE D — GOODS RECEIVED NOTE (GRN) / SERVICE COMPLETION CERTIFICATE

Puppets Picture Education Trust

Field	Details
GRN / SCC No.	
Date of Receipt / Completion	
Purchase Order Ref. No.	
Vendor Name	
Invoice No. & Date	
Delivery Challan No.	

Receipt Details:

S. No.	Item / Service Description	Quantity Ordered	Quantity Received / Delivered	Condition	Discrepancy (if any)
1				<input type="checkbox"/> OK <input type="checkbox"/> Damaged <input type="checkbox"/> Shortfall	
2				<input type="checkbox"/> OK <input type="checkbox"/> Damaged <input type="checkbox"/> Shortfall	
3				<input type="checkbox"/> OK <input type="checkbox"/> Damaged <input type="checkbox"/> Shortfall	
4				<input type="checkbox"/> OK <input type="checkbox"/> Damaged <input type="checkbox"/> Shortfall	
5				<input type="checkbox"/> OK <input type="checkbox"/> Damaged <input type="checkbox"/> Shortfall	

Quality / Completion Assessment:

Parameter	Details
Overall Quality	<input type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory
Specifications Met	<input type="checkbox"/> Yes <input type="checkbox"/> No (details: _____)
Delivery within Agreed Timeline	<input type="checkbox"/> Yes <input type="checkbox"/> No (delay of ___ days)
Action Required (if discrepancy)	<input type="checkbox"/> None <input type="checkbox"/> Replacement <input type="checkbox"/> Credit Note <input type="checkbox"/> Return <input type="checkbox"/> Other: _____

Signatures:

Role	Name	Signature	Date
Received By (Requisitioner / Store)			
Inspected By (Procurement Officer)			
Noted By (Accounts)			

ANNEXURE E — PURCHASE REGISTER

Puppets Picture Education Trust — Financial Year: _____

S. No.	Date of Purchase	Requisition No.	P.O. No.	Vendor Name	Item / Service Description	Budget Head / Programme	Amount excl. GST (₹)	GST (₹)	Total Amount (₹)	Invoice No. & Date	GRN / SCN No.	Payment Mode	Cheque / Transaction Ref.	Payment Date	TDS Deducted (₹)	Net Payment (₹)	Remarks
1																	
2																	
3																	
4																	
5																	
...																	
						Page Total	₹	₹	₹						₹	₹	

Verified By (Accounts): _____ Date: _____ Reviewed By (Trustee): _____
Date: _____

ANNEXURE F — VENDOR EMPANELMENT / REGISTRATION FORM

Puppets Picture Education Trust

Field	Details
Date of Application	
Vendor / Firm Name	
Proprietor / Partner / Director Name	
Constitution	<input type="checkbox"/> Proprietorship <input type="checkbox"/> Partnership <input type="checkbox"/> Pvt Ltd <input type="checkbox"/> LLP <input type="checkbox"/> Other: _____
Registered Address	
City / State / PIN	
Contact Person	
Phone	
Email	
Website	
PAN	
GSTIN	<input type="checkbox"/> Registered: _____ <input type="checkbox"/> Not Registered
MSME / Udyam Registration No.	<input type="checkbox"/> Yes: _____ <input type="checkbox"/> Not Applicable
Bank Account Name	
Bank Name & Branch	
Account Number	
IFSC Code	
Nature of Goods / Services Offered	
Annual Turnover (approx.)	
Years in Business	
Key Clients (references)	1. _____ 2. _____ 3. _____

Declaration:

Statement	Tick
I / We declare that the above information is true and correct.	<input type="checkbox"/>
I / We are NOT related to any Trustee, employee, or specified person (under IT Act Sec 13(3)) of Puppets Picture Education Trust.	<input type="checkbox"/>
I / We are NOT related to or associated with Puppets Picture Pvt Ltd.	<input type="checkbox"/>
I / We have NOT been blacklisted by any government body or organisation.	<input type="checkbox"/>
I / We agree to abide by the Trust's Procurement Policy and Anti-Fraud & Anti-Corruption Policy.	<input type="checkbox"/>
If any of the above declarations are found false, the Trust may cancel empanelment and take appropriate action.	<input type="checkbox"/>

Vendor Authorised Signatory

For Trust Use Only

Name:

Verified By:

Designation:

Date:

Signature & Stamp:

Empanelment Approved Rejected

Date:

Vendor Code Assigned:

Approved By (Procurement Officer / Trustee):

ANNEXURE G — GIFT & HOSPITALITY REGISTER (PROCUREMENT-RELATED)

Puppets Picture Education Trust — Financial Year: _____

S. No.	Date	Name of Staff / Trustee	Designation	Gift / Hospitality Received From (Vendor Name)	Description of Gift / Hospitality	Estimated Value (₹)	Accepted / Declined	Reason (if accepted)	Reported To	Disposal Decision	Signature
1											
2											
3											

Note: As per the Anti-Fraud & Anti-Corruption Policy, gifts above ₹2,000 per occasion from any vendor are prohibited. Any gift received must be declared within 3 working days.

Maintained By: _____ Reviewed By (Trustee): _____ Date: _____

ANNEXURE H — EMERGENCY PURCHASE RATIFICATION FORM

Puppets Picture Education Trust

Field	Details
Emergency Purchase Ref. No.	
Date of Purchase	
Purchased By (Name & Designation)	
Nature of Emergency	
Item / Service Purchased	
Vendor Name & Contact	
Amount (₹)	
Invoice / Receipt No.	
Normal Procedure Deviation	<input type="checkbox"/> No quotations obtained <input type="checkbox"/> Fewer quotations <input type="checkbox"/> Threshold exceeded without prior approval <input type="checkbox"/> Other: _____
Justification for Emergency	

Ratification:

Authority	Name Signature Date	Decision
Procurement Officer		<input type="checkbox"/> Endorsed
Trustee 1 (Mr. Rahul Chakraborty)		<input type="checkbox"/> Ratified <input type="checkbox"/> Not Ratified
Trustee 2 (Mr. Arun Chakraborty)		<input type="checkbox"/> Ratified <input type="checkbox"/> Not Ratified

This form must be completed within 48 hours of the emergency purchase and ratified at the next Board meeting. Filed with Board minutes.

These annexures are designed to be printed and used as standalone forms. I recommend formatting them in A4/Legal size with the Trust’s letterhead and logo before distribution. Your chartered accountant or auditor may suggest minor modifications to align with the specific accounting software or filing system used by the Trust.