



LAKSHYA SHOOTING CLUB

ORGANIZATIONAL

Policy



TABLE OF CONTENTS

Introduction

1. Financial Management And Administration Policy
2. Whistleblower Policy
3. Grievance Redressal Policy
4. Anti-Corruption and Anti-Bribery Policy
5. Procurement Policy
6. Authority Matrix
7. Child Rights Protection Policy
8. Public Relations and Media Policy
9. Common Cost Policy





INTRODUCTION

Lakshya Shooting Club is committed to promoting shooting sports and nurturing young talent in India. To achieve our mission and vision, we have established an organizational policy framework that outlines our guiding principles, values, and practices.

This policy manual serves as a foundation for our organizational culture, ensuring that we maintain the highest standards of integrity, transparency, and accountability in all our operations. Our organizational policies aim to:

- Foster a culture of excellence and teamwork
- Promote fairness, equity, and inclusion
- Ensure compliance with applicable laws and regulations
- Support the well-being and development of our employees, athletes, and stakeholders

This manual outlines our organizational policies and procedures, which will be reviewed and updated periodically to reflect our evolving needs and best practices.



LAKSHYA SHOOTING CLUB

FINANCIAL MANAGEMENT AND ADMINISTRATION POLICY

DATE OF IMPLEMENTATION 09-12-2024

DATE OF AMENDMENT 13-03-2025

SIGNATURES  **LAKSHYA
SHOOTING CLUB**

NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman



1. FINANCIAL MANAGEMENT AND ADMINISTRATION POLICY

1. Introduction

Lakshya Shooting Club ("Club") is a registered non-profit entity under Sections 12A and 80G of the Income Tax Act. This policy outlines the financial management and administrative procedures to ensure transparency, accountability, and efficiency in handling the Club's finances. The policy applies to all Club activities, locations, employees, and associated stakeholders.

2. Policy Governance and Approval

- The Financial Management and Administration Policy is formulated by the Managing Committee and approved by the Board of trustees of the Club.
 - Any amendments require approval from the Board of Trustees.
 - The policy shall be reviewed annually to align with statutory regulations and best practices.
-

3. Financial Planning and Budgeting

3.1 Budget Preparation and Approval

- The Managing Committee drafts the annual budget based on past financial performance and projected revenue.
- The budget is reviewed by the Board of Trustees and approved before the financial year commences.
- Departmental budget allocations must align with organizational goals.

3.2 Budget Reports and Frequency

- Quarterly budget review reports are presented to the Board.
 - Variance analysis is conducted monthly to assess budget adherence and recommend adjustments if needed.
-

4. Revenue Management

4.1 Sources of Funds

- The Club receives funds through:
 - Coaching fees from members.
-

- Corporate Social Responsibility (CSR) contributions from private companies and PUBLIC LIMITED companies (LISTED or UNLISTED).
- Donations from Indian individuals and entities.
- Sponsorships and grants from sports bodies and governmental organizations.
- Membership and Registration fees from shooter members.

4.2 Invoicing and Receipts Generation

- Official invoices are generated for coaching fees and other revenue streams.
 - Donation receipts are issued per statutory tax exemption guidelines.
 - Proper records of invoices and receipts are maintained for audit purposes.
-

5. Fund Management

5.1 Daily Fund Management

- All daily transactions must be recorded in the accounting system to track cash inflows and outflows.
- Cash handling procedures must be followed to avoid discrepancies.

5.2 Bulk Fund Management

- Bulk funds such as CSR contributions and large donations must be deposited directly into the designated bank accounts.
- The utilization of these funds is strictly monitored to ensure compliance with donor conditions.

5.3 Funds Transfer and Bank Deposits

- Bank transactions must have supporting documentation and dual authorization.
 - Funds transferred between accounts should be recorded for reconciliation.
-

6. Expenditure Control and Procurement

6.1 Awarding Contracts

- Vendor selection for goods and services follows a competitive bidding process.
- Contracts must be approved by the Managing Committee based on pre-set evaluation criteria.

6.2 Purchase Orders

- All procurement transactions require an approved Purchase Order (PO).
- POs should include details such as vendor information, item descriptions, and payment terms.

6.3 Signing Authorities

- Financial transactions require dual authorization based on predefined limits.
 - Any exceptions must be documented and approved by the Board.
-

7. Cash Handling and Management

7.1 Cash Collection

- Cash receipts must be recorded immediately in the accounting system.
- A designated cashier or finance officer is responsible for handling cash transactions.
- Members and donors making cash payments must be issued an official receipt. However, cash payments will be avoided whenever possible, but if accepted, they will be strictly limited to the specified amount.

7.2 Cash Disbursement

- Cash payments should be minimized; electronic and bank transfers are preferred.
- Any cash expenditure exceeding a pre-determined limit must be approved by the Managing Committee.
- All cash transactions require supporting documentation and proper authorization.

7.3 Cash Storage and Security

- Cash in hand should not exceed the set daily transaction limit.
- Excess cash must be deposited in the bank by the next working day.
- The finance office must maintain a petty cash fund with a fixed replenishment policy.

7.4 Cash Reconciliation

- Daily cash closing and reconciliation must be performed by the accountant and verified by the Finance Officer on a monthly basis.
 - Cash records are subject to periodic internal and external audits.
-

8. Financial Reporting and Compliance

8.1 Financial Statements

- Monthly, quarterly, and annual financial statements are prepared, reviewed, and audited as required.
- Statements include balance sheets, income and expenditure reports, and cash flow summaries.

8.2 Month-End Reporting

- A reconciliation of bank accounts and financial statements is completed at the end of each month.

8.3 General Ledger Maintenance

- The general ledger records all financial transactions and is reviewed periodically.

8.4 Policy on Safekeeping, Issuing, and Signing of Cheques

- Cheques above a predefined threshold require dual signatures.
 - Unused cheques are securely stored to prevent unauthorized access.
-

9. Payroll and Employee Benefits

9.1 Payroll Administration

- Payroll is processed monthly through direct bank transfers.
- Salaries are disbursed after approval from the HR and Managing Committee.

9.2 Employee Records and Benefits Management

- Employee records, including contracts and salary structures, are maintained securely.
 - Statutory benefits such as Provident Fund (PF), gratuity, and medical insurance are provided in compliance with regulations.
-

10. Asset and Investment Management

10.1 Property and Asset Acquisition and Data Maintenance

- All fixed assets are recorded in an asset register.
- Annual physical verification is conducted to ensure the proper maintenance of assets.

10.2 Investment of Funds

- Surplus funds, if available, are invested in secure, low-risk instruments such as fixed deposits.
 - Investment decisions require prior approval from the Board.
-

11. Fraud Prevention and Risk Management

- The Club enforces strict internal controls to mitigate fraud risks.
 - A whistleblower policy is in place to encourage reporting of financial irregularities.
-

12. Audit and Compliance

- External audits are conducted annually by an independent Chartered Accountant.
- Internal audits are conducted quarterly to ensure compliance and financial accuracy.

13. Financial Data Access and Security

- Only authorized personnel have access to financial records.
 - Data security measures, including encrypted backups, are implemented to prevent breaches.
-

14. Opening and Closing of Bank Accounts

- Any bank account-related decisions require prior approval from the Board.
 - The Managing Committee oversees the bank account operations.
-

15. Advance Management

15.1 Definition and Scope

- Advances refer to funds disbursed in anticipation of future expenses related to operations, procurement, or employee reimbursements.
- This includes travel advances, project advances, procurement advances, and advances for urgent operational needs.

15.2 Approval and Authorization

- All advances must be pre-approved by the Managing Committee or designated authority based on pre-defined approval limits.
- Advance requests should be accompanied by a justification and estimated expenditure breakdown.

15.3 Advance Disbursement Procedure

- Advances are disbursed through bank transfers or cheques; cash advances are discouraged except in exceptional cases.
- The recipient must acknowledge receipt of the advance and agree to the terms of utilization and settlement.

15.4 Utilization and Documentation

- Funds advanced must be used strictly for the approved purpose and within the stipulated timeframe.
- Original invoices, receipts, and expenditure statements must be submitted for verification.

15.5 Settlement and Reconciliation

- Advances must be settled within a defined period (e.g., 15 or 30 days) from the date of disbursement.
- Any unused funds must be returned immediately, and expenses must be reconciled with supporting documents.

15.6 Unsettled Advances

- Employees or vendors with pending settlements from previous advances will not be eligible for new advances.

- Repeated delays in settlement may result in financial penalties or deductions from future payments.

15.7 Travel and Employee Advances

- Travel advances must be requested before travel, with an approved travel plan and estimated costs.
- Post-travel, a detailed expense statement with receipts must be submitted for approval and reconciliation.

15.8 Procurement Advances

- Advances for procurement should be minimized and only provided for essential or bulk purchases where advance payment is necessary.
- Vendors receiving advances must provide an acknowledgment and commit to timely delivery of goods or services.

15.9 Project or Event-Based Advances

- Advances issued for special projects, events, or competitions must be planned and documented with an itemized budget.
- The project/event lead is responsible for proper fund utilization and timely settlement.

15.10 Monitoring and Reporting

- The Managing Committee will maintain a record of all outstanding advances and review them monthly.
 - Unsettled advances will be flagged in financial reports, and appropriate follow-up actions will be taken.
-

16. Record Retention

The purpose of this policy is to ensure systematic retention, retrieval, and disposal of financial and supporting documents in compliance with statutory regulations.

- This policy applies to all financial records, including accounting documents, invoices, receipts, contracts, payroll records, audit reports, and bank statements.

16.1 Retention Periods

- **Accounting and Financial Statements** – Minimum **8 years** from the end of the relevant financial year.
- **Tax Records (including GST, Income Tax, and TDS filings)** – Minimum **8 years** or as required under the Income Tax Act.
- **Bank Records (statements, deposit slips, cheques, fund transfer records)** – Minimum **5 years** from the transaction date.

- **Invoices and Receipts** – Minimum **8 years**, especially those related to CSR funds, grants, and donations.
- **Employee Payroll and Benefits Records** – Minimum **5 years** after an employee exits.
- **Procurement and Contract Documents** – Minimum **10 years** post-expiry or completion of the contract.
- **Audit Reports and Compliance Documents** – Minimum **10 years** for statutory audit reports, internal audits, and compliance filings.
- **Fixed Asset and Investment Records** – Maintained **permanently** or for **8 years** after asset disposal.

16.2 Storage and Security

- All physical documents must be stored securely in designated filing systems with controlled access.
- Digital records should be maintained in **an encrypted and cloud-based system**, with periodic backups.
- Any sensitive financial data should be **password-protected** and accessible only to authorized personnel.

16.3 Disposal of Records

- Expired records will be **reviewed annually** for disposal following due approval from the Managing Committee.
- Records containing confidential information will be **shredded or permanently deleted** to prevent unauthorized access.
- A log of disposed records must be maintained for audit purposes.

16.4 Compliance and Oversight

- The Managing Committee is responsible for ensuring adherence to statutory retention requirements.
- Non-compliance with this policy may result in disciplinary actions and legal consequences.

17. Policy Amendments and Review

- This policy will be reviewed annually by the Managing Committee.



- Amendments must be documented and approved by the Board.

-
- Effective Date: 13-03-2025
Approved by: Board of Trustees
Issued by: Lakshya Shooting Club



LAKSHYA SHOOTING CLUB

WHISTLEBLOWER POLICY

DATE OF IMPLEMENTATION 09-12-2024

SIGNATURES 
LAKSHYA
SHOOTING CLUB

NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman



2. WHISTLEBLOWER POLICY

1. Introduction

Lakshya Shooting Club (“Club”) is committed to maintaining the highest standards of ethics, integrity, and transparency in its operations. This Whistleblower Policy is established to encourage employees, members, volunteers, and other stakeholders to report unethical conduct, fraud, or violations of laws, policies, or regulations without fear of retaliation.

2. Purpose

The purpose of this policy is to:

- Encourage individuals to report suspected misconduct, fraud, corruption, or policy violations.
 - Provide a confidential and secure mechanism for reporting concerns.
 - Ensure fair and transparent investigation of reported matters.
 - Protect whistleblowers from retaliation, harassment, or victimization.
-

3. Scope

This policy applies to:

- Employees (full-time, part-time, contractual staff)
- Board members and executive leadership
- Coaches, volunteers, and trainees
- Vendors, consultants, and other stakeholders

It covers concerns related to:

- Financial misconduct (fraud, bribery, misappropriation of funds, corruption)
 - Legal or regulatory violations
 - Conflict of interest
 - Harassment, discrimination, abuse, or intimidation
 - Unethical behavior impacting the Club’s reputation
 - Other violations of Club policies
-



4. Reporting Mechanism

Whistleblowers can report concerns through the following channels:

a. Written Complaints

Send a confidential complaint to:

Internal Compliance Officer

Lakshya Shooting Club

'Lakshya', Plot no 16, Road no 4, Sector 1, New Panvel - 410206

Email: ic.officer@lakshyashooting.com

b. Anonymous Reporting

To ensure confidentiality, whistleblowers may submit anonymous complaints via a sealed envelope marked "Confidential – Whistleblower Report" on the address given above.

c. Direct Reporting to Board

In cases where concerns involve senior management, reports may be sent directly to:
Chairperson, Board of Directors

MRS SUMA SHIRUR

Lakshya Shooting Club

'Lakshya', Plot no 16, Road no 4, Sect 1, New Panvel - 410206

Email: suma.shirur@olympian.org

5. Confidentiality and Protection

- The identity of the whistleblower will be kept confidential, except when disclosure is required by law.
- The Club strictly prohibits retaliation against whistleblowers, including termination, demotion, harassment, or discrimination.
- Any individual found retaliating against a whistleblower will face disciplinary action, including possible termination.

6. Investigation Process



1. Acknowledgment: The Club will acknowledge receipt of the complaint within 7 working days.
 2. Preliminary Review: A preliminary assessment will be conducted to determine if an investigation is warranted.
 3. Investigation: If necessary, an independent investigation will be conducted by the Internal Compliance Team/External Auditor.
 4. Findings & Actions: The findings will be reviewed by the Board of Directors/Management, and appropriate corrective actions will be taken.
 5. Closure & Communication: The whistleblower (if identified) will be informed of the outcome, subject to legal and confidentiality restrictions.
-

7. False or Malicious Allegations

- Whistleblowers must report in good faith.
 - False, malicious, or misleading allegations may result in disciplinary action.
-

8. Policy Review and Amendments

This policy will be reviewed annually or as required by changes in law or Club operations. Amendments will be approved by the Board of Directors.

9. Contact Information

For any queries or concerns regarding this policy, please contact:

Internal Compliance Officer

Email: ic.officer@lakshyashooting.com



LAKSHYA SHOOTING CLUB

GRIEVANCE REDRESSAL POLICY

DATE OF IMPLEMENTATION 09-12-2024

SIGNATURES 


NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman

3. GRIEVANCE REDRESSAL POLICY

1. Introduction

1.1 Purpose: The Grievance Redressal Policy aims to provide a structured and transparent process for addressing concerns and grievances of members, athletes, employees, and stakeholders of Lakshya Shooting Club (“Club”).

1.2 Commitment: The Club is committed to ensuring a fair, unbiased, and efficient resolution process, maintaining a professional and conducive sporting environment.

2. Scope and Applicability

2.1 This policy applies to all individuals associated with the Club, including but not limited to:

- Athletes, trainees, and members
- Parents/guardians of minor athletes
- Vendors, sponsors, and other stakeholders

2.2 This policy covers grievances related to:

- Disciplinary actions, unfair treatment, and discrimination
 - Harassment, abuse, or misconduct
 - Facility and service-related concerns
 - Administrative and financial matters
-

3. Grievance Redressal Committee (GRC)

3.1 Composition: The Grievance Redressal Committee (GRC) shall consist of:

- Chairperson: A senior Club official/board member
- Two Committee Members: One independent external member and one senior representative of the Club
- One Female Representative

3.2 Responsibilities:

- Receiving and reviewing grievances
 - Conducting fair and impartial investigations
 - Making recommendations for resolution
 - Ensuring timely redressal of complaints
-



4. Grievance Filing Mechanism

4.1 Modes of Filing: Grievances can be filed through any of the following means:

- Email: ic.officer@lakshyashooting.com
- Written Complaint: Submission to the 'Lakshya', Plot no 16, Road no 4, Sector 1, New Panvel - 410206

4.2 Required Details:

- Name, contact details, and relationship with the Club
 - Description of the grievance, including date, time, and location
 - Supporting documents, if any
-

5. Confidentiality Clause

5.1 Confidentiality Commitment: The Club ensures that all grievances and related information will be handled with the utmost confidentiality.

5.2 Restricted Access: Only designated members of the Grievance Redressal Committee and authorized personnel shall have access to grievance-related records.

5.3 Protection Against Retaliation: Any complainant shall be protected from victimization, retaliation, or discrimination for filing a grievance.

6. Investigation Process and Timeframes

6.1 Acknowledgment: Upon receipt of a grievance, an acknowledgment will be sent to the complainant within 7 working days.

6.2 Preliminary Assessment: The GRC will review the complaint and determine its validity within 15 working days.

6.3 Detailed Investigation: If required, a formal inquiry shall be conducted, and statements will be recorded within 30 working days.

6.4 Resolution and Communication: A decision shall be communicated to the complainant within 90 working days from the date of filing.

6.5 Extensions: If an extension is required due to complexity, the complainant shall be informed in writing, with justifications.

7. Escalation Mechanism

7.1 If a complainant is dissatisfied with the resolution provided by the GRC, they may escalate the grievance to:

- Chairman of the Club (Level 1 escalation)

7.2 The escalation request must be made in writing within 7 days of receiving the initial resolution.

8. Communication and Feedback

8.1 Grievance Tracking: The complainant will receive regular updates on the progress of their complaint.

8.2 Feedback Collection: Upon resolution, the complainant may be requested to provide feedback on the grievance redressal process to ensure continuous improvement.

9. Policy Review and Updates

9.1 This policy shall be reviewed annually or as required based on legal and regulatory changes.

9.2 Amendments, if any, shall be approved by the Board of Trustees and communicated to all stakeholders.

9.3 The latest version of the policy shall be made available on request and on notice boards.

Effective Date: 09-12-2024

Approved by: Board of Trustees

Issued by: Lakshya Shooting Club



LAKSHYA SHOOTING CLUB

ANTI-CORRUPTION AND ANTI BRIBERY POLICY

DATE OF IMPLEMENTATION 09-12-2024

DATE OF AMENDMEND 13-03-2025

SIGNATURES  **LAKSHYA**
SHOOTING CLUB

NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman

4. ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

1. Introduction

1.1 Purpose: The Anti-Corruption and Anti-Bribery Policy aims to establish clear guidelines to prevent corruption, bribery, and unethical practices within Lakshya Shooting Club (“Club”).

1.2 Commitment: The Club is committed to maintaining transparency, integrity, and accountability in all its dealings and activities. The club will follow a ZERO TOLERANCE APPROACH AND POLICY in this regard.

2. Scope and Applicability

2.1 This policy applies to all individuals associated with the Club, including but not limited to:

- Athletes, trainees, and members
- Coaches, staff, and volunteers
- Parents/guardians of minor athletes
- Vendors, sponsors, and other stakeholders

2.2 The policy covers all forms of corruption, including but not limited to:

- Bribery (direct or indirect)
 - Kickbacks and facilitation payments
 - Fraud, extortion, and embezzlement
 - Conflict of interest
 - Unethical financial transactions
-

3. Prohibited Conduct

3.1 Bribery: No individual shall offer, give, receive, or solicit anything of value as a means of influencing decisions or securing an improper advantage.



3.2 Kickbacks: Payments made to secure contracts, approvals, or favorable treatment are strictly prohibited.

3.3 Fraud and Embezzlement: Misrepresentation, misappropriation of funds, or falsification of records is strictly forbidden.

3.4 Gifts and Hospitality: Accepting gifts, entertainment, or hospitality that may influence decisions or create conflicts of interest is not allowed, except in nominal and customary cases.

3.5 Political Contributions: The Club shall not make any political donations or contributions that may be construed as an attempt to influence government actions.

4. Roles and Responsibilities

4.1 Club Management: Responsible for establishing a culture of integrity and ensuring compliance with this policy.

4.2 Employees and Members: Must uphold the highest standards of ethical behavior and report any suspected corruption.

4.3 Vendors and Partners: Must comply with the Club's policy and contractual obligations regarding anti-bribery and anti-corruption.

5. Reporting Violations

5.1 Confidential Reporting: Any individual who suspects or becomes aware of corrupt activities must report them through the dedicated email ID : sumashirur@olympian.org

5.2 Non-Retaliation: The Club ensures that no individual will face retaliation for reporting in good faith.

6. Investigation and Disciplinary Actions

6.1 Investigation Process: The Club shall investigate all reports of corruption in a fair, confidential, and timely manner.

6.2 Disciplinary Measures: If violations are confirmed, appropriate actions shall be taken, including:

- Termination of employment or membership
-



- Legal proceedings if necessary
- Reporting to relevant authorities

6.3 False Reports: Deliberately false allegations will also be subject to disciplinary action.

7. Third-Party Interactions

7.1 Contractual Obligations: Agreements with third parties shall include anti-corruption and anti-bribery clauses.

8. Training and Awareness

8.1 Mandatory Training: All employees, members, and stakeholders will undergo periodic training on anti-corruption practices.

8.2 Awareness Campaigns: Regular awareness programs shall be conducted to reinforce ethical behavior.

9. Policy Review and Updates

9.1 This policy shall be reviewed annually or as required by changes in legal or regulatory frameworks.

9.2 Amendments, if any, shall be approved by the Managing Committee and communicated to all stakeholders.

9.3 The latest version of the policy shall be made available on request and notice boards.

Effective Date: 09-12-2024

Approved by: Board of Trustees

Issued by: Lakshya Shooting Club



LAKSHYA SHOOTING CLUB

PROCUREMENT POLICY

DATE OF IMPLEMENTATION 09-12-2024

SIGNATURES 
LAKSHYA
SHOOTING CLUB

NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman

5. PROCUREMENT POLICY

1. Introduction

1.1 Purpose: The Procurement Policy of Lakshya Shooting Club (“Club”) is designed to establish a transparent, fair, and corruption-free procurement system for acquiring goods and services necessary for training, events, and operations, and for maintaining quality.

1.2 Commitment: The Club is committed to ethical procurement practices, ensuring fairness, cost-effectiveness, highest standards of quality, and adherence to applicable laws and regulations.

2. Objectives

2.1 To ensure transparency, accountability, and fairness in the procurement process.

2.2 To establish a standardized approach for acquiring goods and services.

2.3 To prevent corruption, favoritism, and conflicts of interest in procurement activities. 2.4 To optimize costs while maintaining high-quality standards for procured items.

3. Scope and Applicability

3.1 This policy applies to all procurement activities undertaken by the Club, including:

- Equipment and firearms
- Ammunition and consumables
- Training materials and accessories
- Event-related services
- Facility maintenance and infrastructure development
- Professional services and consultancy

3.2 This policy applies to all employees, officials, and third parties involved in the procurement process.

4. Procurement Principles

4.1 Fair Competition: Ensuring all qualified vendors have an equal opportunity to participate.

4.2 Transparency: Clearly defining procurement needs, processes, and selection criteria.

4.3 Value for Money: Achieving the best combination of quality, cost, and service.

4.4 Integrity and Ethics: Preventing bribery, favoritism, and conflicts of interest.

4.5 Sustainability: Encouraging environmentally and socially responsible procurement.

5. Procurement Methods

5.1 Competitive Bidding:

- Used for high-value procurement (above Rs 100000/- [Rupees One lac Only]).
- Requires a minimum of three quotations from the qualified and authorised vendors as per the product/equipment.
- The lowest or best-value bid shall be selected.

5.2 Direct Procurement:

- Permitted only for urgent, low-value purchases below the defined threshold.
- Requires justification and approval from authorized person, which will be Secretary, Mr. Sidharth Shirur till notified otherwise.

5.3 Framework Agreements:

- Long-term agreements with pre-approved vendors for frequently required goods/services.

5.4 Single-Source Procurement:

- Allowed only under special circumstances, such as proprietary equipment or exclusive suppliers.
- Justification and approval from the managing committee are mandatory.

6. Vendor Selection and Management

6.1 Pre-Qualification:

- Vendors must meet minimum eligibility criteria related to experience, financial stability, and compliance with legal standards.

6.2 Performance Evaluation:

- Vendors will be regularly assessed based on quality, reliability, and compliance.

6.3 Blacklisting Policy:

- Vendors involved in corrupt, fraudulent, or unethical practices will be disqualified and blacklisted.
-

7. Approval and Authorization Process

7.1 All procurement transactions must follow a structured approval hierarchy, with designated approval limits.

7.2 Managing Committee:

- Shall review and approve procurement requests exceeding a defined threshold.
- Managing committee officials to ensure impartial decision-making.

7.3 Financial Authority:

- Defined approval levels based on procurement value (e.g., Manager-Level, Procurement Committee, Board of Trustees).
 - Procurement below Rs 100000 will be authorized by the secretary, and any procurement from above 100000 to Rs 1 Crore, will be authorized by the managing committee.
 - Procurement above Rs 1 Crore will be authorized by the board of trustees.
-

8. Conflict of Interest and Ethical Considerations

8.1 Declaration of Interest:

- Any person involved in procurement must disclose personal or financial interests in vendors.

8.2 No Gifts or Favors:

- Employees must not accept gifts, hospitality, or favors that could influence procurement decisions.

8.3 Whistleblower Protection:

- Employees and vendors are encouraged to report unethical procurement practices confidentially.



9. Documentation and Record Keeping

9.1 All procurement transactions must be properly documented and retained for audit purposes.

9.2 Documentation must include:

- Purchase requisitions and approvals
- Vendor quotations and selection records
- Contracts and agreements
- Payment records and receipts

9.3 Audit and Review:

- Procurement records shall be periodically reviewed by auditors.
-

10. Monitoring and Compliance

10.1 The Club shall implement procurement monitoring mechanisms to detect irregularities.

10.2 Compliance Checks:

- Regular internal audits to ensure adherence to policy guidelines.
- Immediate corrective actions for any non-compliance.

10.3 Enforcement:

- Violations of this policy will result in disciplinary action, including termination or legal proceedings if necessary.
-

11. Policy Review and Updates

11.1 This policy shall be reviewed annually or as required by changes in procurement laws and Club requirements.

11.2 Amendments, if any, shall be approved by the Managing committee and communicated to all relevant stakeholders.

11.3 The latest version of the policy shall be made available on website.

Effective Date: 09-12-2024

Approved by: Board of Trustees

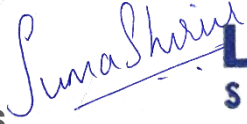
Issued by: Lakshya Shooting Clu



LAKSHYA SHOOTING CLUB

AUTHORITY MATRIX

DATE OF IMPLEMENTATION 09-12-2024

SIGNATURES  **LAKSHYA SHOOTING CLUB**

NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman

6. AUTHORITY MATRIX

1. Introduction

1.1 Purpose: This Authority Matrix outlines the approval levels for financial, procurement, human resources, operational, and compliance decisions within Lakshya Shooting Club (“Club”).

1.2 Objective: To ensure clear delegation of authority, transparency, and accountability in decision-making.

2. Authority Levels

- Level 1: Board of Trustees
 - Level 2: Managing Committee
 - Level 3: Secretary
 - Level 4: Functional Heads (HR, Admin, Technical, Coaching)
 - Level 5: Executives / Staff
-

3. Authority Matrix

Function	Level 1 (Board)	Level 2 (Managing Committee)	Level 3 (Secretary)	Level 4 (Head of Department)	Level 5 (Staff)
Financial Approvals	₹ 1 Crore+	Above ₹ 1 Lac up to ₹ 1 Crore	Up to ₹ 1 Lac	No approval rights	No approval rights
Procurement	Final approval for high-value contracts	Approves major vendor contracts	Shortlists vendors, negotiates terms	Recommends purchases	Requests purchases
HR Decisions	Approves senior hires, policies	Approves mid-level hires, salary revisions	Approves junior hires, performance reviews	Handles day-to-day HR matters	No hiring authority
Operational Decisions	Sets strategic direction	Approves training / event budgets	Manages execution of training / events	Supervises daily operations	Conducts training
Policy & Compliance	Approves policy changes	Ensures compliance with policies	Implements policies	Monitors compliance	Adheres to policies



4. Notes & Guidelines

4.1 Escalation: Any decision exceeding the defined threshold must be escalated to the next authority level.

4.2 Delegation of Authority: If required, authority can be delegated to a lower level with prior approval from the higher authority.

4.3 Review Mechanism: This matrix shall be reviewed annually and updated as per operational requirements.

Effective Date: 09-12-2024

Approved by: Board of Trustees


Issued by: Lakshya Shooting Club



LAKSHYA SHOOTING CLUB

CHILD RIGHT PROTECTION POLICY

DATE OF IMPLEMENTATION 09-12-2024

SIGNATURES 


NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman



7. CHILD RIGHTS PROTECTION POLICY

Lakshya Shooting Club

Effective Date: 09-12-2024

1. Purpose

Lakshya Shooting Club (LSC) is committed to creating a safe, supportive, and inclusive environment for children participating in shooting sports. This policy aims to protect children's rights, prevent harm, and ensure compliance with relevant child protection laws and guidelines.

2. Scope

This policy applies to:

- All children (below 18 years) participating in club activities
- Coaches, trainers, staff, volunteers, and club members
- Parents/guardians of child participants
- Any third-party vendors or contractors interacting with children

3. Key Principles

LSC adheres to the following principles:

- **Right to Safety:** Every child has the right to a safe and secure environment free from harm.
- **Right to Dignity and Respect:** Children must be treated with dignity, without discrimination, bullying, or harassment.
- **Right to Participation:** Children have the right to participate in decisions affecting them.
- **Zero Tolerance for Abuse:** LSC has zero tolerance for physical, emotional, or sexual abuse.

4. Protection Measures

4.1 Screening and Training of Personnel

- All coaches, trainers, and staff working with children must undergo background verification.
- Regular training on child protection, safe interactions, and reporting mechanisms will be conducted.

4.2 Safe Sporting Environment

- Adequate supervision by qualified and club authorised coaches, is mandatory during all training, in case of participants below 18 years of age.



- Facilities will be designed to ensure privacy and safety for children.
- Any inappropriate behavior or bullying will be strictly dealt with.

4.3 Code of Conduct

- No physical punishment or verbal abuse.
- No inappropriate physical contact.
- Encouragement of positive reinforcement and skill-building.

4.4 Reporting and Response Mechanism

- The POSH Internal Committee will be designated to handle concerns regarding children also.
- Any child, parent, or staff member can report misconduct to the POSH committee.
- Complaints will be confidentially investigated, and appropriate action will be taken as laid down in '*grievance redressal policy*' of the LSC.

4.5 Parental Involvement

- Parents will be encouraged to participate in club activities and provide feedback.
- Parental consent is mandatory for child participation in training activities.

5. Compliance and Legal Framework

- This policy aligns with The Protection of Children from Sexual Offences (POCSO) Act, 2012, Juvenile Justice Act, 2015, and UN Convention on the Rights of the Child (CRC).
- LSC will collaborate with legal authorities and child welfare organizations when required.

6. Review and Amendment

- This policy will be reviewed annually and updated as needed.
- Feedback from stakeholders will be incorporated for continuous improvement.

7. Declaration

By participating in Lakshya Shooting Club activities, all members, staff, and volunteers agree to abide by this policy and contribute to a safe environment for children.

Effective Date: 09-12-2024

Approved by: Board of Trustees

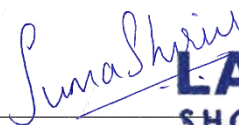
Issued by: Lakshya Shooting Club



LAKSHYA SHOOTING CLUB

PUBLIC RELATIONS AND MEDIA POLICY

DATE OF IMPLEMENTATION 13-03-2025

SIGNATURES  **LAKSHYA**
SHOOTING CLUB

NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman

8. PUBLIC RELATIONS AND MEDIA POLICY

1. Introduction

Lakshya Shooting Club ("Club") is committed to maintaining a strong public image and positive media relations to enhance its reputation, promote its activities, and manage communication effectively. This policy outlines the principles and procedures governing publicity, marketing, and crisis communication with media stakeholders.

2. Policy Governance and Approval

This Public Relations and Media Policy is formulated by the Communications Committee and approved by the Board of Trustees. Any amendments or updates require approval from the Board of Trustees. The policy is subject to periodic review to ensure alignment with best practices.

- **Communications Committee**

Composition: Comprises members appointed by the Managing Committee, including media specialists, digital communication experts, and representatives from the Club's management team.

Role:

- Develops and implements the Club's media strategy.
- Oversees branding, communication, and social media presence.
- Engages with media outlets, journalists, and public relations agencies.
- Manages crisis communication and ensures timely and strategic responses.
- Monitors media coverage and public perception of the Club.
- The committee will be in charge of media engagement, branding, and crisis communication. This may be changed and specified in the general instructions for each event as per availability, or as per skills during a specific crisis, depending on the scale and level of the matter at hand.

- **Managing Committee**

Specific Role:

- Ensures alignment of media and branding efforts with the Club's mission.
- Sanctions crisis communication responses and major press releases.



- **Board of Trustees**

Specific Role:

- Provides oversight and ensures adherence to ethical and legal standards in media engagements.
- Grants final approval for significant amendments to the PR and media policy.
- Acts as an advisory body in crisis situations and high-impact PR decisions.

- **Designated Media Spokesperson**

Composition: A Club official appointed by the Communications Committee, typically a senior member with experience in public relations.

Role:

- Serves as the official representative for media interactions.
 - Issues statements and responses to media queries in alignment with Club policies.
 - Ensures messaging remains consistent and adheres to the Club's strategic communication plan.
 - Conducts media awareness programmes for staff and athletes to prevent PR mishaps, in consultation with communications committee.
-

3. Publicity and Marketing

3.1 Branding and Communication Strategy

- All external communication, including promotional material, social media content, and press releases, must align with the Club's mission and values.
- The use of the Club's logo, official colors, and branding elements must be consistent across all platforms.
- Communication should highlight achievements, events, and initiatives that support the Club's objectives.

3.2 Social Media and Digital Presence

- The Club shall maintain an active presence on social media platforms, including but not limited to Facebook, Instagram, Twitter, and LinkedIn.
 - Only authorized personnel can post on official accounts; content should be pre-approved by the Communications Committee.
 - Any negative or defamatory comments on social media must be handled professionally and escalated if necessary.
 - Members and staff must adhere to ethical social media conduct guidelines to prevent reputational risks.
-



3.3 Media Engagement and Press Releases

- All media inquiries must be directed to the designated spokesperson or Communications Committee.
- Press releases should be approved by the Managing Committee before publication.
- The Club shall organize press conferences and media briefings to highlight major achievements and upcoming events.
- Media interactions should be transparent and aligned with the Club's messaging strategy.

3.4 Sponsorship and Partnership Communications

- The Club shall acknowledge sponsors and partners through official channels, ensuring mutual benefits and positive branding.
- Any public mention of sponsorships and partnerships must be pre-approved by the Managing Committee.
- Sponsored content and promotional materials should align with the Club's ethical standards and values.
- There will be a clear agreement/MoU with mutually agreed terms with sponsors on branding, guidelines, media mentions, and PR coordination. It can be also a section of the main sponsorship agreement/MoU. It will be ensured that there is compliance with the sponsorship agreement in PR & Media activities.

4. Crisis Communication

4.1 Crisis Identification and Response

- A crisis is defined as any situation that may negatively impact the Club's reputation, operations, or stakeholders.
- The crisis situation may arise out of any viral issues, negative publicity, or misinformation on any platform viz social media, digital media, print media.
- The Crisis Management Team, led by the Chairman and Communications Committee, shall assess the situation and develop a response plan.
- Swift action is required to contain misinformation and prevent escalation.

4.2 Spokesperson and Official Statements

- Only designated spokespersons are authorized to speak on behalf of the Club during a crisis.
- Official statements must be concise, factual, and aligned with the Club's response strategy.
- Internal stakeholders must be briefed before public announcements to ensure consistency.

4.3 Crisis Communication Protocol

A structured approach is necessary to handle crisis situations such as misconduct allegations, event mishaps, sponsorship issues, and reputational risks. The following checklist provides a step-by-step guide to crisis management:

Step 1: Identify and Categorize the Crisis

- Determine the nature and severity of the crisis (e.g., misconduct, legal issue, operational failure, negative media coverage, data breach).
- Assess the potential impact on the Club's reputation, stakeholders, and operations.
- If necessary, immediately escalate to the Managing Committee.

Step 2: Convene the Managing Committee

- The Communications Committee will convene a crisis response meeting within 2 hours of identifying a major issue.

Step 3: Gather and Verify Information

- Collect all available facts related to the crisis from reliable sources.
- Cross-check information before making any public statements to avoid spreading misinformation.
- Engage legal or compliance teams if required.

Step 4: Develop a Crisis Response Strategy

- Determine the best course of action based on the severity and impact of the crisis.
- Craft an official response statement that is clear, factual, and transparent.
- Decide on communication channels (press release, social media, direct outreach, internal memo).

Step 5: Issue Official Statements & Engage with Media

- The designated spokesperson will handle all media inquiries.
- First public response should be issued within 24 hours of crisis confirmation.
- Maintain a consistent message across all communication channels.

Step 6: Engage with Key Stakeholders

- Inform internal stakeholders (members, staff, sponsors, and partners) before public disclosure.
- If sponsorships or partnerships are affected, ensure direct communication with sponsors to manage expectations.
- Address concerns and provide reassurances to affected parties.

Step 7: Monitor Public Sentiment and Adjust Strategy

- Monitor media coverage and social media discussions for emerging concerns.
- If misinformation spreads, issue a corrective statement immediately.
- Respond to public concerns in a professional and non-defensive manner.

Step 8: Implement Damage Control Measures

- If necessary, take corrective action (e.g., disciplinary action, policy changes, official apology).
- Announce any internal investigations or remedial steps taken to prevent recurrence.

Step 9: Conduct a Post-Crisis Review

- Within 3 weeks of resolution, hold a debriefing to assess how the crisis was managed.
- Identify strengths and weaknesses in the response strategy.
- Document lessons learned and update crisis communication protocols if necessary.

Step 10: Follow-Up Communication

- Continue monitoring for residual effects or ongoing concerns related to the crisis.
- Maintain open lines of communication with affected parties to rebuild trust.

4.4 Media Handling During Crisis

- All media interactions during a crisis should be handled professionally and strategically.
- Journalists' inquiries should be answered accurately but without speculation.
- Social media monitoring should be intensified to address misinformation and provide timely updates.

6. Internal Communication and Member Engagement

5.1 Communication with Members and Stakeholders

- Regular updates should be provided to members regarding Club activities, policies, and achievements.
- An official communication channel (email, WhatsApp group, or website) must be maintained for seamless information flow.
- Feedback from members should be encouraged and incorporated into decision-making when appropriate.

5.2 Annual Report

- A periodic Annual Report should be published on Website of club for members and stakeholders, covering key developments, success stories, and upcoming events.
 - The Annual Report should maintain a professional tone and align with the Club's branding guidelines.
-

6. Compliance and Ethical Considerations

- The Club's communication must adhere to legal and ethical standards.
- No false, misleading, or exaggerated claims should be made in promotional material.
- Confidential information must not be disclosed to the media without prior authorization.
- Members and staff must respect media engagement guidelines to ensure consistency and professionalism.

6.1 Legal and Ethical Risks

Media engagement carries inherent legal risks that must be managed carefully. To prevent legal liabilities, the following guidelines should be observed:

- **Defamation:** Avoid making statements that could harm the reputation of individuals, organizations, or partners. Ensure that all public statements are factual and can be substantiated.
- **Intellectual Property:** Do not use copyrighted material (images, videos, articles) without proper authorization. Acknowledge and credit sources when using external content.
- **Misinformation:** Ensure that all published information is accurate and verified. Avoid spreading rumors or unverified claims that could mislead the public.
- **Privacy Violations:** Do not disclose personal or confidential information of members, staff, or stakeholders without explicit consent.
- **Regulatory Compliance:** Adhere to local and national media and advertising laws to prevent legal consequences.

6.2 Conflict of Interest Management

To ensure transparency and integrity in public relations and sponsorship deals, the following measures should be implemented:

- **Disclosure:** Any personal or financial interests in sponsorships, media engagements, or partnerships must be disclosed to the Managing Committee.
 - **Separation of Interests:** Decisions related to sponsorships, endorsements, and PR engagements should be made based on merit and alignment with the Club's values, not personal affiliations.
-



- **Approval Process:** All sponsorships and PR-related financial transactions must be reviewed and approved by the Communications Committee to prevent conflicts of interest.
- **Ethical Sponsorship Guidelines:** Ensure that sponsors align with the Club's mission and do not compromise its reputation or values.

6.3 Anti-Discrimination and Inclusion Policy

The Club is committed to promoting diversity, equity, and inclusion in all media and public engagements. The following principles must be upheld:

- **Fair Representation:** Ensure that all communications, media content, and PR campaigns reflect diverse and inclusive perspectives.
 - **Non-Discrimination:** No content should promote discrimination based on gender, ethnicity, religion, disability, or socioeconomic status.
 - **Inclusive Language:** Use language that is respectful, non-biased, and inclusive in all media and public statements.
 - **Equal Opportunities:** Provide equal access to media exposure and promotional opportunities for all members and stakeholders, regardless of background.
-

7. Confidentiality and Data Protection

- Member and stakeholder information shall be protected under data privacy regulations.
- Personal data shared during promotional activities must have prior consent from the individuals concerned.
- Any breach of confidentiality must be reported and handled as per the Club's internal protocols.

7.1 Compliance with Data Protection Laws

- The Club shall comply with all applicable regional and national data protection laws, ensuring that member and stakeholder data is handled responsibly.
 - Personal information collected for media or promotional purposes must be obtained with explicit consent from the individuals involved.
 - The Club shall implement security measures to protect data from unauthorized access, misuse, or breaches.
-



8. Media Training and Capacity Building

Personal Social Media Guidelines

Staff, employees, and members of Lakshya Shooting Club play an important role in maintaining the Club's reputation. While personal social media accounts belong to individuals, their online activity can impact the organization. The following guidelines outline best practices for representing the Club on personal social media accounts:

8.1 General Conduct:

- Employees and members must uphold the values and integrity of the Club when engaging in public discussions online.
- Avoid sharing confidential, defamatory, or misleading information about the Club, its members, or partners.
- Always maintain a respectful and professional tone when discussing Club-related matters.

8.2 Disclaimers:

- If expressing personal opinions that may relate to the Club, include a disclaimer such as: "The views expressed here are my own and do not represent the views of Lakshya Shooting Club."
- Employees in leadership positions should avoid making statements that could be misinterpreted as official Club policy.

8.3. Prohibited Content:

- **Employees must not post or share:**
 - Hate speech, discriminatory remarks, or offensive language.
 - Leaked, confidential, or sensitive Club documents.
 - False or misleading claims about the Club, its activities, or stakeholders.
 - Unapproved endorsements of sponsors, partners, or brands in the Club's name.

8.4. Handling Criticism and Negative Comments:

- Employees should not engage in arguments or disputes regarding Club-related matters on social media.
- Any negative content or misinformation should be reported to the Communications Committee for official handling.



8.5. Use of Club Name and Branding:

- Employees must not use the Club's logo, brand name, or imagery for personal promotions, endorsements, or commercial purposes without prior approval.
- Personal posts that include Club-related images should be respectful and align with the organization's professional image.

8.6. Reporting Violations:

- Any breaches of these guidelines should be reported to the Communications Committee.
 - Violations may lead to disciplinary actions depending on the severity of the incident.
-

9. Policy Review and Amendments

- This policy will be reviewed annually by the Communications Committee.
- Amendments must be documented and approved by the Managing Committee before implementation.
- Any suggestions by any member/stakeholder of Lakshya shooting club shall be heard by the communication committee in an open channel the specific suggestions can be deliberate upon and discussed by the communication committee.

Any revision required in the said policy as result of the suggestion shall be communicated by the communication committee to the managing committee for its approval and further adoption as per due process.

Effective Date: 13-03-2024

Approved by: Board of Trustees

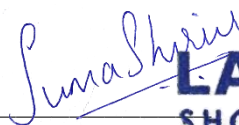
Issued by: Lakshya Shooting Club



LAKSHYA SHOOTING CLUB

COMMON COST POLICY

DATE OF IMPLEMENTATION 01-04-2025

SIGNATURES  **LAKSHYA**
SHOOTING CLUB

NAME OF SIGNATORY- Mrs. Suma Shirur

Designation – Chairman

9. COMMON COST POLICY

1. Purpose

The purpose of this policy is to establish guidelines for allocating, managing, and recovering common costs incurred in the operation of Lakshya Shooting Club (LSC). It ensures equitable distribution of shared expenses among stakeholders while maintaining financial sustainability and compliance with regulatory norms.

2. Scope

This policy applies to:

- All operational, administrative, and maintenance expenses incurred for the common benefit of members and participants.
 - Allocation of costs across training programs, competitions, events, and other club activities.
 - Members, trainees, staff, and any other stakeholders using club facilities.
-

3. Definition of Common Costs

Common costs refer to expenses that are shared among different programs, events, and users of the club. These include but are not limited to:

3.1 Facility and Infrastructure Costs

- Rent, lease, or maintenance of shooting ranges and premises.
- Electricity, water, and utility bills.
- Equipment purchase, maintenance, and depreciation costs.
- Safety and security-related expenditures.

3.2 Administrative and Operational Costs

- Salaries or honorariums for coaches, administrative staff, and support personnel.
- Office supplies, communication, and internet expenses.
- Marketing, outreach, and promotional activities.
- General legal, compliance, and licensing costs.

3.3 Training and Competition Costs

- Coaching fees, workshop charges, and training material costs.
 - Range usage fees, target paper, ammunition subsidies, and other consumables.
 - Competition-related expenses (entry fees, travel, lodging, and logistics support).
-

4. Cost Allocation Mechanism

4.1 Direct vs. Indirect Cost Allocation

- Direct Costs: Expenses attributable to a specific program, training, or event will be charged directly to that activity.
- Indirect Costs: Expenses benefiting multiple activities will be pooled and fairly apportioned using an allocation formula.

4.2 Allocation Methods

Common costs will be allocated using the following basis:

- Facility Costs: Based on the proportion of usage hours per program.
- Training & Coaching Fees: Divided among participants based on the number of sessions/days attended.
- Administrative Overheads: Distributed across all revenue-generating activities.
- Competition Costs: Covered through a mix of participant contributions and sponsorships where available.

5. Cost Recovery and Fee Structure

- Training fees will be structured to recover a fair share of common costs.
- Event-based contributions may be required for special programs, tournaments, and workshops.
- Sponsorships and donations will be utilized where possible to subsidize costs for financially constrained participants.

6. Financial Transparency & Accountability

- All common costs will be documented and reported in club financial statements.
- An annual review of cost allocation will be conducted to ensure fairness and accuracy.
- The Managing Committee/Secretary will oversee adherence to this policy and make necessary adjustments.

7. Review & Amendments

- This policy will be reviewed annually and updated based on operational needs.
- Any amendments will require approval from the governing body of the club.

8. Compliance & Governance

- The club will adhere to applicable accounting and non-profit financial management guidelines under Income Tax Act, 1961 (12A & 80G compliance).



- Funds will be utilized strictly for the objectives of Lakshya Shooting Club as per its Approved Scheme for the better management and administration of the public trust LAKSHYA SHOOTING CLUB by the Assistant Charity Commissioner, Raigad Region, Alibag.

Effective Date: 01-04-2025

Approved by: Board of Trustees

Issued by: Lakshya Shooting Club