



# FERRANDO SPEECH AND HEARING CENTRE

(Early Intervention, Education, Rehabilitation and Man Power Development for the Deaf)  
Umniuh - Khwan, P.O.U.C.C., Ri-Bhoi District, Meghalaya - 793122, India  
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## **Anti-Corruption Policy**

Ferrando Speech and Hearing Centre established on 16<sup>th</sup> April 1996. It was established to reach out to hearing-impaired children from all over India especially from North East Region. The vision of the institute *is to educate, rehabilitate, and empower people with disabilities to live independently in a diverse society*. With that vision the organization have reached out number of children who had difficulty in hearing and have helped them to be self-reliant.

### **1. Application of Anti-Corruption & Anti Money Laundering Laws of the Ferrando Centre and for the Purpose of this Policy**

Corruption is the willingness to act dishonestly in return for money or personal gain and is an aspect of human behaviour that has been around for a long time. For that reason, it may be easy to forget the damage that corruption does. By wrongly benefiting a few individuals who abuse their power or position, corruption creates unfair competition, damages innovation and undermines integrity.

Because of the damage corruption does to the public good, it is illegal and we in India has numerous laws in this regard, Prevention of Corruption Act, 1988; Foreign contribution Regulation Act, 2010; Black Money And Imposition of Tax Act 2015; The Lokpal and Lokayuktas Bill, 2011; The Whistle Blowers Protection Bill, 2011; The Benami Transactions (Prohibition) Bill, 2011; The Prevention of Bribery of Foreign Public Officials and Officials of Public International Organisations Bill, 2011 and many more laws and directions passed time to time. All such laws are collectively hereinafter referred to as “Anti-Corruption Laws”. Money laundering is the process of concealing the source of funds and ownership of illegally gained proceeds that is then reintroduced into the economy for legitimate purposes (all such laws are collectively hereinafter referred to as “Anti-Money Laundering Laws”).

Corruption and money laundering tend to be interrelated.

Failure by Ferrando Speech and Hearing Centre's personnel to comply with this Policy may expose the Ferrando Speech and Hearing Centre to substantial risk and could jeopardize its service, operations and reputation. You should also be aware that violations of certain Anti- corruption and Anti- Money Laundering Laws may subject individual to both criminal penalties, including prison sentences, and civil liability.

## **2. Ferrando Speech and Hearing Centre on anti-corruption**

Ferrando Speech and Hearing Centre does not pay and does not condone paying bribes to anyone. Ferrando Speech and Hearing Centre staff, teachers or administration are prohibited from giving or offering bribes, kickbacks, commissions or similar payment or consideration of any kind, whether at home or abroad, to any person or entity (including but not limited to children or their parents, government official, political party, candidate for political office or any intermediaries, such as agents, attorneys or consultants) in order to influence official acts or decisions of that person or entity.

Ferrando Speech and Hearing Centre does not accept and does not condone the acceptance or receipt of bribes from anyone. Ferrando Speech and Hearing Centre staff are prohibited from accepting or receiving bribes, kickbacks, or similar payment or consideration of any kind, whether at home or abroad, from any person or entity which is intended to, or which may be perceived as being intended to secure any improper advantage for the offer or of the bribe and/or any entity that he/she represents

Ferrando Speech and Hearing Centre Personnel are also prohibited from providing or receiving gifts, meals, entertainment, travel, accommodation or anything of value to any person or entity in connection with Company business unless it is provided or received in accordance with this Policy.

## **3. Giving and Receiving Benefits**

Ferrando Speech and Hearing Centre acknowledges that the giving and receiving of nominal benefits (such as small gifts, meals and entertainment) is a common practice and is intended to strengthen and build long term relationships with students, parents and benefactors. However, before a benefit (whether given or received) can be considered proper and legitimate under this Policy, certain criteria must be met.

In general, the benefit in question must:

- be given/received for a legitimate purpose,
- be infrequent or occasional in nature,
- be transparent, open and accurately recorded along with original receipts in accounts
- be respectful, customary and in accordance with local customs,
- comply with applicable laws; and
- be given in compliance with this Policy and the Ferrando Speech and Hearing Centre's Code of Conduct

#### **4. "Facilitating" Or "Grease" Payments**

Facilitating or grease payments are small payments made to low-level government officials or service personnel. These payments have generally been utilised in order to expedite or secure the performance of "routine governmental actions" which are limited to a narrow range of non- discretionary acts that are ordinarily and commonly performed by a government official. Facilitation payments are illegal in almost all circumstances. It is Ferrando Speech and Hearing Centre policy that the practice of providing facilitating or grease payments by any one from Ferrando Speech and Hearing Centre or its behalf is strictly forbidden.

#### **5. Record-Keeping, Accounting & Payment Practices**

Ferrando Speech and Hearing Centre Personnel must follow all applicable standards, principles, laws, regulations, and file the audited reports to the concerned government agencies. In particular, Ferrando Speech and Hearing Centre administration must be timely, complete, and accurate when preparing all required reports and records.

It is the Ferrando policy to maintain accurate, reasonably detailed records that fairly reflect its transactions and disposition of assets, regardless of whether the transactions are domestic or international. Therefore, Ferrando Personnel are prohibited from making any false or misleading statements in books and records for any reason. In addition, the Ferrando centre shall maintain a system of internal accounting controls sufficient to provide reasonable assurances that:

transactions are recorded as necessary: (i) to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements; and (ii) to maintain accountability for assets.

## **6. Disciplinary Action On Non-Compliance**

Violations of this Policy will not be tolerated. Any Ferando Personnel who violate this Policy will be subject to disciplinary action up to and including termination of employment, suspension or relationship with the Ferando centre. At the same time, any Personnel who makes complaints with mala fide intentions and which are subsequently found to be false may be subject to disciplinary action.