

**Fudbalski klub Breznica Pljevlja | Football Club Breznica Pljevlja**  
*Pljevlja, Montenegro*

**ANTI-CORRUPTION POLICY**

2022

Football club Breznica, Montenegro | Fudbalski klub Breznica

[fkbreznica@yahoo.com](mailto:fkbreznica@yahoo.com) | <http://www.fkbreznica.me>

# Anti-Corruption Policy

## PURPOSE

This policy provides information on FK BREZNICA's commitment to conducting its operations in an ethical and honest manner and implementing and enforcing systems that eradicate any corruptive activity. The FK BREZNICA is committed to conducting all of its business activities in compliance with all domestic legislation, rules and regulations.

General Secretariat and employees are dedicated to high ethical standards and recognize the FK BREZNICA's duty to conduct its affairs within the conformity of the law. The FK BREZNICA has a zero-tolerance approach to bribery and corruption. The FK BREZNICA will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates. This policy applies to all individuals, members, working, cooperating or volunteering within the FK BREZNICA including consultants, contractors, trainees, seconded staff, agency staff, volunteers, interns, or any other natural or legal person associated with the FK BREZNICA.

## 1. DEFINITIONS (in line with Law on Prevention of Corruption Official Gazette No. 054/24)

For the purpose of this policy the term:

1. Fraud constitutes any illegal acts characterized by deceit, concealment or violation of trust. Frauds are perpetrated by parties and organizations to obtain money, property or services; to avoid payment or loss of services; or to secure personal or business advantage, such as theft of money, theft of goods, obtaining a benefit, discount or rebate to which a person is not entitled. Same applies to acts committed in digital form.
2. Fraud related organization represent any act of fraud occurring within an organization, usually resulting in financial gain to the criminals, organization or individuals working within the organization, such as:
  - Financial Fraud
    - theft from the organization by employees or others
    - income received and not declared and banked
    - falsification of invoices or other paperwork for gain or other reasons
    - giving preferential status or free services to friends or family or related persons.
  - Procurement Fraud
    - undeclared personal relationships between employees/members and third parties
    - deliberate mismanagement of tender and procurement processes.
  - Employee claims
    - submission of false claims
    - provision of false documentation to secure benefits.
  - Misuse of physical & financial assets

- theft by a third party
  - use of the organization's equipment for the running of own interests without prior approval.
  - Gifts, hospitality or other bribes
    - offering or accepting gifts, hospitality or dishonest payments in exchange for goods or services
3. Bribery is an inducement or reward offered or promised in order to gain any commercial or other advantage.

## **2. PREVENTION AND REPORTING ANTI-CORRUPTION INCLUDING CONFLICT ON INTEREST**

- 2.1 The organization requires all those representing FK BREZNICA including its employees, members partners, contractors and agents, to act in accordance with this policy. This includes reporting any suspected or actual instances of fraud, bribery or corruption involving FK BREZNICA's assets to the executive General Secretary or, if required, the General Secretariat.
- 2.2 Employees and members are positively encouraged to raise any concerns they may have on these issues, in the knowledge that such concerns will be treated in the utmost confidence and properly investigated. Full support will be offered to those persons who voice their concerns.
- 2.3 In order to protect and safeguard FK BREZNICA's integrity, all individuals, members, volunteers and any other natural and legal person associated with FK BREZNICA will strive to avoid any conflict of interest, both individually and collectively. This refers to relationship between the interests of the organisation on the one hand, and personal, professional, and business interests on the other. Upon engagement or appointment General Secretary, members of General Secretariat and General Assembly will make a written disclosure of interests, such as relationships, and position held, that could potentially result in a conflict of interest.
- 2.4 The General Secretariat is responsible for assessing the potential for fraud and corruption within the FK BREZNICA's activities and for implementing appropriate strategies to minimize this risk.

## **3. GIFTS AND HOSPITALITY**

- 3.1 FK BREZNICA members are permitted to accept gifts from third parties and to give gifts to third parties provided the following requirements are met:
- they are not made with the intention of influencing a decision to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits
  - they comply with local law
  - they do not include cash or a cash equivalent (such as gift certificates or vouchers)

- they are given openly, not secretly

#### **4. EXTERNAL AUDITS**

4.1 The financial statements of the FK BREZNICA are reviewed by an external auditor in line with the law and FK BREZNICA's internal regulations.

#### **5. FINAL Provision**

5.1 This Policy has been prepared consistent with Montenegrin legal law. This policy shall be subject of revision should any new law or revision to the Law on Prevention Corruption take effect to provide consistency with the law.

Date of adoption  
February 2022

Approved by

Zoran Vuković  
General Secretary