

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

## **POLICY ON EQUAL TREATMENT AND PROTECTION FROM DISCRIMINATION**

## TABLE OF CONTENTS

---

1. Purpose and Guiding Principles
  2. Scope of Application
  3. Protected Characteristics
  4. Prohibited Forms of Discrimination and Harassment
  5. Rights and Responsibilities
  6. Disciplinary Commission
  7. Complaints Procedure
  8. Disciplinary Commission Proceedings
  9. Measures and Sanctions
  10. Prevention, Education and Promotion of Inclusion
  11. Relationship with External Institutions
  12. Legal Framework
  13. Review and Amendment
  14. Entry into Force and Signatures
- Annex A: Complaint Submission Form
- Annex B: Acknowledgement of Receipt and Compliance Declaration

## 1. PURPOSE AND GUIDING PRINCIPLES

---

Football club Breznica is the Montenegrin football club and NGO that utilizes sports and sports-pedagogical methods to promote social cohesion, inclusion, and positive youth development. Active since 2013, we partner with primary schools, local CSOs, the Ministry of Education, the Ministry of Sport & Youth, the Institute of Education and the University of Montenegro to design and deliver school-based sports-pedagogical sessions, teacher trainings, and educational resources. Our work blends practical sport activities with non-formal education to address discrimination and strengthen life skills. Through capacity building, advocacy, and long-term partnerships, FK BREZNICA seeks to institutionalize inclusive practice in schools and scale sport-based approaches that promote equity, dialogue, and European values.

The fight against discrimination lies at the very core of our mission. This Policy is therefore not merely a formal document, as it reflects our values and our daily practice, the foundational framework that defines how the organization conducts itself internally and in relation to all people with whom it comes into contact.

### 1.1 Guiding Principles

- Every person possesses equal dignity and worth, irrespective of their personal characteristics.
- Discrimination in any form is unacceptable and will not be tolerated.
- Equality does not mean identical treatment of all people, but rather fair and adapted treatment that recognizes differences and special needs.
- An organization that advocates for the rights of marginalized social groups must itself serve as a model of inclusion and equity.
- Every complaint will be taken seriously, handled promptly and processed impartially.
- People who report discrimination or participate in proceedings are protected from any form of retaliation (victimization).

*Legal basis: This Policy is harmonized with the Law on Prohibition of Discrimination of Montenegro (Official Gazette of Montenegro [OGM] No. 46/10, 40/11, 18/14), the Labor Law (OGM No. 74/19 and subsequent amendments through 2024), the Law on Prohibition of Workplace Harassment (Anti-Mobbing Law), the European Convention on Human Rights and Fundamental Freedoms, and the guidelines of the Council of Europe and ILGA-Europe.*

## 2. SCOPE OF APPLICATION

---

This Policy applies to all persons who are in any capacity connected to FK BREZNICA, including:

- employees at all positions and levels within the organization (engaged under fixed-term and open-ended employment contracts)
- volunteers
- members of the organization
- consultants and external associates engaged under service contracts
- beneficiaries of the organization's services and programs
- donors, partners and partners organizations
- all visitors to the organization's premises and events.

The Policy applies in all contexts of the organization's work, including:

- the organization's premises
- field activities and outreach work
- events, gatherings and conferences
- written, oral and electronic communications
- social media and online platforms
- any situation in which a person acts on behalf of the organization.

*Article 2 of the Labor Law (LL): The anti-discrimination provisions apply to all employees and persons engaged on any contractual basis.*

*Article 3 of the Law on Prohibition of Discrimination (LPD): The right to protection from discrimination belongs to all natural and legal persons to whom Montenegrin law applies.*

### 3. PROTECTED CHARACTERISTICS

FK BREZNICA prohibits discrimination, harassment and any unfavorable treatment based on the following characteristics or any combination thereof (multiple discrimination):

#### 3.1 Grounds for Protection

| Protected Ground                       | Examples / Clarifications                              |
|--|--|
| Race, ethnicity and national origin    | Color, ethnic origin, minority community affiliation   |
| Religion, belief or conviction         | Including atheism and agnosticism                      |
| Age                                    | Discrimination against younger and older persons alike |
| Disability                             | Physical, mental, sensory and other forms              |
| Health status                          | Including HIV/AIDS status                              |
| Marital, partnership and family status | Including same-sex couples                             |
| Socio-economic and financial status    | Social origin, property status                         |
| Language and education                 | Mother tongue and other languages                      |
| Political and other convictions        | Including trade union membership                       |
| Migrant or asylum-seeker status        | Regardless of regularity of residence                  |
| Gender identity and gender expression  | Trans, intersex, non-binary and gender-variant persons |
| Sex and gender                         | Including gender reassignment (Art. 7 LL)              |
| Any other personal characteristic      | Open-ended list pursuant to Art. 2 LPD                 |

*Special protection to protecting children and young people from abuse, preventing harm and promoting their wellbeing. This means having:*

- *effective safeguarding policies and procedures*
- *codes of conduct for sport*
- *safe recruitment processes*
- *relevant training for staff and volunteers.*

## **4. PROHIBITED FORMS OF DISCRIMINATION AND HARASSMENT**

### **4.1 Direct Discrimination**

Direct discrimination occurs when a person is treated less favorably than another person in a comparable situation, and the basis for that treatment is a protected characteristic.

*Articles 7 and 8 of the Labor Law; Article 2(3) of the Law on Prohibition of Discrimination*

### **4.2 Indirect Discrimination**

Indirect discrimination occurs when an apparently neutral provision, criterion or practice puts or would put a person at a particular disadvantage compared with other persons on account of a protected characteristic — unless that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim is appropriate and necessary.

*Article 8(2) of the Labor Law; Article 2(4) of the Law on Prohibition of Discrimination*

### **4.3 Harassment**

Harassment is any unwanted conduct (verbal, non-verbal or physical) related to a protected characteristic, the purpose or effect of which is to violate the dignity of a person and to create an intimidating, hostile, degrading, humiliating or offensive environment. Harassment includes conduct carried out through audio and video surveillance, mobile devices, social networks and the internet.

*Article 10(2) of the Labor Law*

### **4.4 Sexual Harassment**

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, the purpose or effect of which is to violate the dignity of a person, and in particular when such conduct creates an intimidating, hostile, degrading, humiliating or offensive environment.

*Article 10(3) of the Labor Law*

### **4.5 Workplace Harassment (Mobbing)**

Workplace harassment (mobbing) is any repeated conduct directed at an employee or group of employees which is intended to, or has the effect of, violating their dignity, reputation and personal and professional integrity, or which creates an intimidating, hostile or offensive environment, worsens working conditions or leads to the isolation of an employee or induces them to terminate their employment on their own initiative.

*Article 14 of the Labor Law; Law on Prohibition of Workplace Harassment (Anti-Mobbing Law)*

### **4.6 Victimization**

Victimization is any adverse treatment of, or detrimental consequence for, a person who has reported discrimination, participated in proceedings as a witness, or otherwise supported a person who has filed a complaint. No employee shall suffer any adverse consequence as a result of reporting or giving evidence in cases of harassment or sexual harassment.

*Article 10(4) of the Labor Law; Article 4 of the Law on Prohibition of Discrimination*

#### 4.7 Instruction to Discriminate

Instructions to another person to engage in discriminatory conduct on any ground is prohibited. An instruction to discriminate shall constitute discrimination regardless of whether it is carried out.

*Article 2(5) of the Law on Prohibition of Discrimination*

#### 4.8 Hate Speech

Any form of expression — including ideas, statements, information and opinions — that disseminates, incite, promotes or justifies discrimination, hatred or violence against persons or groups of persons on account of a personal characteristic is prohibited. This includes xenophobia, racial hatred, antisemitism and all other forms of hatred based on intolerance, including intolerance expressed in the form of nationalism, discrimination and hostility against minorities.

*Article 9a of the Law on Prohibition of Discrimination*

#### 4.9 Specific Examples of Prohibited Conduct

The Policy expressly prohibits, without limitation, the following conduct:

- discriminatory jokes, comments, insults or humiliations based on protected characteristics
- unequal treatment of job applicants or prospective volunteers during recruitment and selection
- unequal access to the organization's programs, services and resources
- outing — the unauthorized disclosure of a person's sexual orientation, gender identity or health status without their consent
- displaying or distributing offensive, discriminatory or pornographic material
- excluding people from activities on account of their personal characteristics
- coercing or conditioning access to benefits upon acceptance of discriminatory conduct
- online harassment and harassment through digital platforms (cyberbullying).

## **5. RIGHTS AND RESPONSIBILITIES**

---

### **5.1 Rights of All Persons to Whom This Policy Applies**

- The right to equal treatment and dignity in all circumstances
- The right to submit a complaint without fear of retaliation or victimization
- The right to confidential and impartial handling of the complaint
- The right to support and accompaniment (by a trusted support person or legal representative) throughout the proceedings
- The right to be informed in a timely manner of the progress and outcome of the proceedings
- The right to appeal a decision
- The right to submit a complaint to external institutions, independently of and concurrently with internal proceedings.

### **5.2 Responsibilities of Management and the General Secretariat**

The General Secretary and the General Secretariat are responsible for:

- establishing, implementing and regularly reviewing this Policy
- appointing the members of the Disciplinary Commission
- creating a safe and inclusive working environment
- providing regular training for employees, volunteers and members
- responding to every reported case of discrimination in a prompt, impartial and consistent manner
- ensuring adequate resources for the implementation of this Policy
- protecting complainants and witnesses from victimization.

*Article 19 of the Labor Law — employer obligations*

### **5.3 Responsibilities of Employees, Volunteers and Members**

- To comply with this Policy and adhere to its provisions
- To report any instance of discrimination they witness or experience
- To actively contribute to an inclusive organizational culture
- To participate in training provided by the organization
- To maintain confidentiality regarding information obtained through disciplinary proceedings
- To refrain from exerting pressure on the parties to the proceedings or on witnesses.

## 6. DISCIPLINARY COMMISSION

---

### 6.1 Composition of the Disciplinary Commission

The Disciplinary Commission is a standing body of FK BREZNICA responsible for conducting proceedings on complaints and imposing measures. The Commission shall consist of three (3) members:

| Position on the Commission | Holder of the Role                          | Notes                                 |
|----------------------------|---|---------------------------------------|
| Chairperson                | Person appointed by the General Assembly    | Conducts proceedings; signs decisions |
| Member 1                   | Employee representative                     | Elected by employees by vote          |
| Member 2                   | Person appointed by the General Secretariat | May be an external expert             |

### 6.2 Term of Office

- The term of office of Commission members shall be two (2) years, with the possibility of one renewal.
- The Commission shall be appointed by decision of the General Secretariat within thirty (30) days of the adoption of this Policy.
- In the event of the resignation, removal or incapacity of a member, the General Secretariat shall appoint a replacement within fifteen (15) days.

### 6.3 Recusal from Proceedings

A member of the Commission is obliged to recuse themselves from proceedings where:

- they are in a close personal or professional relationship with any party to the proceedings
- they are themselves the complainant or the respondent
- they have a direct personal interest in the outcome of the proceedings
- there exist other circumstances that give rise to reasonable doubt as to their impartiality.

An application for recusal may also be submitted by any party to the proceedings. Recusal applications shall be decided by the General Assembly within three (3) working days.

### 6.4 Jurisdiction of the Disciplinary Commission

The Disciplinary Commission shall have jurisdiction to:

- receive and process complaints in accordance with this Policy
- conduct a preliminary assessment of the admissibility and merits of a complaint
- conduct fact-finding proceedings
- issue a written reasoned decision
- recommend and impose measures in accordance with this Policy
- maintain a register of all cases

Football club Breznica, Montenegro | Fudbalski klub Breznica

- submit an annual report to the General Assembly on the number and nature of cases handled

## **6.5 Working Arrangements of the Commission**

- The Commission shall take decisions by consensus or, where that is not possible, by simple majority vote.
- Sessions are closed to the public.
- Minutes shall be taken at each session and signed up by all members present.
- The Commission may engage an external expert (e.g. a legal adviser or psychologist) in an advisory capacity, without voting rights.

*Articles 147 and 148 of the Labor Law — disciplinary proceedings procedure*

## 7. COMPLAINTS PROCEDURE

### 7.1 Who May Submit a Complaint?

A complaint may be submitted by:

- any person who considers that they have been subjected to discrimination, harassment or victimization in the context of the organizations' activities;
- a witness who has directly observed discriminatory conduct (with the consent of the person who considers themselves to have been discriminated against, or anonymously).

### 7.2 Channels for Submitting a Complaint

| Channel          | Details  | Receipt                                 |
|------------------|--|---|
| Email            | <a href="mailto:FK.Breznica.me@gmail.com">FK.Breznica.me@gmail.com</a><br>(subject line: 'Complaint — Confidential') | Immediate upon sending                  |
| Post / Written   | Organization's address, marked 'Confidential — Disciplinary Commission'  | Upon postal delivery                    |
| In person (oral) | Directly to the Chairperson of the Commission or General Secretary   | Immediate; recorded in writing          |
| Telephone        |  | Immediate; written confirmation follows |
| Anonymous        | Via anonymous email or letter  | Commission acts to the extent possible  |

### 7.3 To Whom Should a Complaint Be Addressed?

- The Disciplinary Commission — as the primary channel
- The General Secretary — where the complaint does not implicate them
- The Chairperson of the General Assembly — where the complaint is directed against the General Secretary or where the complainant does not wish to approach the General Secretary
- The General Assembly — where the complaint concerns the governing bodies or where there are multiple complaints against the same persons.

### 7.4 Contents of a Complaint

A complaint should contain:

1. Name and contact details of the complainant (except in the case of anonymous complaints)
2. Name or description of the respondent (the person against whom the complaint is made)
3. A description of the specific conduct or incident, including date, location and circumstances
4. The protected ground on which the alleged discrimination is based
5. Any available evidence (correspondence, witnesses, photographs, recordings, etc.)
6. The remedy or outcome sought by the complainant.

### **7.5 Time Limit for Submitting a Complaint**

A complaint may be submitted within one (1) year of the complainant becoming aware of the alleged discrimination, and in any event no later than three (3) years from the date on which the discriminatory act occurred.

*Article 27 of the Law on Prohibition of Discrimination — time limit for bringing an action (applied by analogy to internal complaints)*

## 8. DISCIPLINARY COMMISSION PROCEEDINGS

---

### 8.1 Overview of the Proceedings

| Step | Action  | Responsible Party             | Time Limit                                  |
|------|---|-------------------------------|---|
| 1    | Receipt of complaint and written acknowledgement to the complainant     | Chairperson of the Commission | 3 working days                              |
| 2    | Preliminary assessment of the admissibility and merits of the complaint | Commission                    | 10 working days                             |
| 3    | Notification of the respondent and service of written warning           | Commission                    | 5 working days from admissibility decision  |
| 4    | Respondent's written or oral reply                                      | Respondent                    | 15 working days                             |
| 5    | Fact-finding: interviews, documents, witness evidence                   | Commission                    | 20 working days                             |
| 6    | Issue of written reasoned decision with notice of right of appeal       | Commission                    | 15 working days from close of investigation |
| 7    | Service of decision on all parties                                      | Chairperson of the Commission | 8 working days from decision                |
| 8    | Time limit to appeal to the General Secretariat                         | Any party to the proceedings  | 15 days from receipt of decision            |
| 9    | Final decision of the General Secretariat on the appeal                 | General Secretariat           | 30 days from receipt of appeal              |

### 8.2 Preliminary Assessment

During the preliminary assessment phase, the Commission shall determine:

- whether the complaint contains sufficient information to proceed
- whether the conduct complained of falls within the scope of this Policy
- whether there are circumstances indicating the need for urgent action (e.g. an ongoing threat to the well-being of a person).

Where the complaint is inadmissible or falls outside the Commission's jurisdiction, the complainant shall be notified in writing with reasons and directed to the appropriate external institutions.

### 8.3 Written Warning and Right of Reply

The respondent shall be served with a written warning containing:

- personal details and position within the organization

Football club Breznica, Montenegro | Fudbalski klub Breznica

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

---

**Football Club Breznica Pljevlja, Montenegro**

- a description of the alleged conduct with relevant dates and circumstances;

- notice that they have the right to submit a written or oral reply
- the time limit for reply (15 working days).

The respondent has the right to request an oral hearing and to attend accompanied by an authorized trade union representative or a legal representative.

*Article 147(4)-(9) of the Labor Law — content of the written warning and right of reply*

#### **8.4 Fact-Finding Investigation**

During the investigation, the Commission may:

- interview the complainant, respondent and witnesses
- gather written documentation, electronic correspondence, recordings and other evidence
- engage an external expert (e.g. psychologist, legal counsel) in an advisory capacity, without voting rights
- request the opinion of a trade union.

All parties have the right to be accompanied throughout the proceedings by a support person or legal representative. The proceedings shall be conducted on an urgent and confidential basis.

#### **8.5 Burden of Proof**

Where the complainant establishes facts from which discrimination may be presumed, the burden of proof shifts to the respondent to demonstrate that no breach of the principle of equal treatment has occurred.

*Article 142(2) of the Labor Law; Article 29 of the Law on Prohibition of Discrimination — reversal of the burden of proof*

#### **8.6 Decision**

The Commission shall issue one of the following decisions:

- The complaint is well-founded — specifying the established violations and the measure imposed
- The complaint is partially well-founded — specifying the established and unestablished allegations
- The complaint is not well-founded — with detailed reasons.

The decision shall contain: an introductory part, an operative part (dispositif), a statement of reasons and a notice of the right of appeal to the General Secretariat

*Article 148 of the Labor Law — content and service of the decision*

#### **8.7 Confidentiality**

All information obtained in the course of the proceedings shall be treated as strictly confidential. The identity of the complainant and all participants in the proceedings shall be protected to the greatest extent possible. Personal data shall be processed and stored in accordance with the Law on Personal Data Protection of Montenegro (OGM No. 79/08, 70/09, 44/12, 22/17).

A breach of confidentiality by a Commission member or participant in the proceedings shall constitute a serious breach of professional obligations and shall give rise to liability in accordance with this Policy.

---

**Football Club Breznica Pljevlja, Montenegro**

*Article 10(4) of the Labour Law — prohibition of detrimental consequences for reporting*

Football club Breznica, Montenegro | Fudbalski klub Breznica

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

## 9. MEASURES AND SANCTIONS

---

A breach of this Policy constitutes a serious violation of the internal rules of NGO LGBT Forum Progress. Depending on the gravity and circumstances of the specific case, and in accordance with the principle of proportionality, one or more of the following measures may be applied.

### 9.1 For Employees — Minor Violations

- Written reprimand specifying the nature of the breach
- Mandatory participation in training or a workshop
- Financial penalty of up to 20% of monthly salary for a period of one to three months.

*Article 146(1) of the Labor Law*

### 9.2 For Employees — Serious Violations

- Financial penalty of 20%–30% of monthly salary for a period of one to four months
- Temporary withdrawal of specific responsibilities or authority
- Conditional termination of employment — activated where a further serious violation occurs within six (6) months
- Termination of employment (dismissal), where the violation is particularly serious, intentional, systematic or has caused significant harm.

*Article 146(2) and (3) of the Labor Law; Article 172 LL — grounds for individual dismissal*

### 9.3 For Volunteers and Members

- Written reprimand
- Temporary suspension of volunteering engagement (up to six months)
- Permanent suspension of volunteering engagement
- Expulsion from membership, in accordance with the Statute of the organization

### 9.4 For External Associates and Partners

- Written reprimand or warning
- Temporary suspension of the collaborative relationship
- Termination of the contractual relationship, with notification to the relevant donor or partner body where appropriate

### 9.5 Interim Measures

Where circumstances indicate a serious and imminent risk to the dignity, safety or well-being of any person, the Commission may recommend — and the General Secretary or General Secretariat may immediately impose — interim measures to separate the parties pending the conclusion of proceedings (e.g. temporary remote working arrangements, reassignment of responsibilities).

*Article 154 of the Labor Law — discretionary suspension from work; Article 28 of the Law on Prohibition of Discrimination — interim measures*

## 9.6 Vexatious and Bad-Faith Complaints

---

**Football Club Breznica Pljevlja, Montenegro**

Complaints that are deliberately false and submitted in the knowledge that the allegations are untrue, with the intention of causing harm to another person, shall themselves constitute a serious violation of this Policy and may give rise to the same disciplinary measures as a breach thereof.

*Note: The initiation of internal disciplinary proceedings does not affect or limit the complainant's right to simultaneously or subsequently refer the matter to external protection bodies (the Protector of Human Rights and Freedoms, courts, the Labor Inspectorate) — this right is absolute and inalienable.*

## **10. PREVENTION, EDUCATION AND PROMOTION OF INCLUSION**

FK BREZNICA takes an active role in preventing discrimination and fostering an inclusive organizational culture through the following measures:

### **10.1 Training and Capacity Building**

- Mandatory induction training on this anti-discrimination Policy for all new employees, volunteers and members — prior to the commencement of work or engagement
- Periodic refresher training and additional capacity building, at minimum once per year
- Specialized training for members of the Disciplinary Commission on procedural aspects and victim protection.

### **10.2 Inclusive Organizational Culture**

- Adoption of inclusive and gender-sensitive language in all internal and external communications
- Regular assessment of the organizations' internal culture and climate through an anonymous annual survey
- Promotion of diversity in recruitment, volunteer engagement and selection of external associates
- Availability of this Policy to all interested persons on the organizations' website ([lgbtprogres.me](http://lgbtprogres.me)) and in printed form on the premises.

### **10.3 Reasonable Accommodation and Removal of Barriers**

The organization commits to actively removing barriers that prevent the full participation of persons with disabilities, persons in financial hardship and persons in marginalized situations. This includes provision of accessible communication formats, ensuring accessibility of premises and offering flexible forms of engagement.

## 11. RELATIONSHIP WITH EXTERNAL INSTITUTIONS

Persons who consider that they have been subjected to discrimination may — in addition to the internal protection mechanism established by this Policy — also address the following institutions:

| Institution   | Jurisdiction   | Contact / Notes  |
|---|--|--|
| Protector of Human Rights and Freedoms (Ombudsperson) | Protection from discrimination; complaint handling; conciliation; initiating court proceedings | ombudsman.co.me  |
| Labor Inspectorate                                    | Supervision of compliance with the Labor Law and anti-discrimination provisions in employment  | Ministry of Labor, Montenegro                            |
| Agency for Peaceful Resolution of Labor Disputes      | Alternative dispute resolution in employment matters   | amrrs.me — mandatory prior to court (Art. 140 LL)        |
| Competent Court                                       | Judicial protection from discrimination; damages   | Action within 1 year of becoming aware of discrimination |
| Police / State Prosecutor's Office                    | Criminal complaint (for serious violations and criminal offences)                              | Urgent referral in cases of violence                     |

FK BREZNICA may provide legal support to individuals through advisory services, referral to a lawyer or legal representative appearing before the above-mentioned institutions.

*Article 16 of the Labor Law; Articles 21 and 24 of the Law on Prohibition of Discrimination — jurisdiction of the Protector of Human Rights and Freedoms and judicial protection*

## 12. LEGAL FRAMEWORK

---

This Policy is applied in conformity with the following Montenegrin legislation and international standards:

### 12.1 Domestic Legislation

- Law on Prohibition of Discrimination of Montenegro (Official Gazette of Montenegro No. 46/10, 40/11, 18/14)
- Labor Law of Montenegro (OGM No. 74/19, 08/21, 59/21, 68/21, 145/21, 77/24, 84/24, 86/24)
- Law on Prohibition of Workplace Harassment (Anti-Mobbing Law)
- Law on Personal Data Protection of Montenegro (OGM No. 79/08, 70/09, 44/12, 22/17)
- Criminal Code of Montenegro (offences of discrimination and harassment)
- Law on Protection from Domestic Violence
- Statute of FK BREZNICA

### 12.2 International Standards and Instruments

- Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights), notably Article 14 (Prohibition of Discrimination)
- Charter of Fundamental Rights of the European Union;
- Council of Europe Recommendation CM/Rec(2010)5 on measures to combat discrimination on grounds of sexual orientation or gender identity
- ILGA-Europe standards for civil society organizations
- The Yogyakarta Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity (2006) and the Yogyakarta Principles Plus 10 (2017)
- United Nations Universal Declaration of Human Rights, Article 7 (Equality before the Law and Non-discrimination).

### **13. REVIEW AND AMENDMENT**

---

This Policy is subject to regular review. A review shall be conducted at least once per year, or on an extraordinary basis — in the event of material changes to the legislative framework, the internal structure of the organization, or lessons learned from the application of the Policy.

Proposals for amendment may be initiated by:

- the General Secretary
- any employee, volunteer or member of the organization
- the Disciplinary Commission
- the General Assembly

Amendments to this Policy shall be adopted by the General Assembly. All amendments shall enter into force upon adoption and shall be communicated in a timely manner to all persons to whom the Policy applies.

### **14. ENTRY INTO FORCE**

---

The Policy shall enter into force on the date of its adoption by General Assembly.

By signing the Acknowledgment of Receipt and Compliance Declaration (Annex B), all natural people to whom this Policy applies, employees and volunteers confirm that they read, understood and undertake appropriate actions to comply with this Policy.

Date of adoption  
February 2022

Approved by

Zoran Vuković  
General Secretary



---

## ANNEX A: COMPLAINT SUBMISSION FORM

---

This form is strictly confidential. Please complete it as fully as possible and submit it to the Disciplinary Commission of FK BREZNICA.

### Details of the Complainant

(complete or mark 'Anonymous')

Full name

Contact details (email or phone)

Status within the organization

Employee   
Other

Volunteer

Member

Beneficiary

### Details of the Complaint

Respondent (person against whom complaint is made)

Date / period of the alleged violation

Location

Protected ground (characteristic at issue)

Description of the alleged conduct (please be as specific as possible)

Evidence / witnesses (please specify)

Remedy or outcome sought

Signature and date

---

## **ANNEX B: ACKNOWLEDGEMENT OF RECEIPT AND COMPLIANCE DECLARATION**

---

I, the undersigned, declare that I have read, understood and accept the Policy on Equal Treatment and Protection from Discrimination of FK BREZNICA.

I undertake to comply with the provisions of this Policy in all situations in which I act on behalf of or in the context of the organizations' activities, and to report any breach of the Policy that I witness or experience.