



CeMI

INTERNAL POLICIES

Statute and internal acts of the Centre for Monitoring and Research





CENTRE FOR MONITORING AND RESEARCH

CeMI Internal Policies

Statute and internal acts of the Centre for Monitoring and Research

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FOUNDING ACT

STATUTE OF THE NGO CENTRE FOR MONITORING AND RESEARCH



FOUNDING ACT

Statute of the NGO Centre for Monitoring and Research

Consolidated text, as amended by the Assembly on 3 July 2025

Unofficial English translation. In case of any discrepancy, the Montenegrin original prevails.

Pursuant to Articles 12 and 49 of the Law on Non-Governmental Organisations (Official Gazette of Montenegro, Nos. 39/11 and 37/17), and in accordance with the provisions of the Statute of the non-governmental organisation Centre for Monitoring and Research CeMI, the Assembly of the NGO Centre for Monitoring and Research, at its session held on 3 July 2025, adopted the Amendments to the Statute.

The Statute of the NGO Centre for Monitoring and Research was adopted at the session of the Assembly of the NGO Centre for Monitoring and Research held on 7 March 2000, and Amendments to the Statute were adopted at the sessions of the Assembly held on 15 October 2008, 28 July 2012, 23 May 2018, 3 February 2020, 17 January 2022, 12 January 2023 and 3 July 2025,

so that the consolidated text reads as follows:

GENERAL PROVISIONS

ARTICLE 1

The Centre for Monitoring and Research is a non-governmental association.

ARTICLE 2

The full name of the Association is Centar za monitoring i istraživanje.

The abbreviated name in Montenegrin is CeMI.

The full name in English is Center for Monitoring and Research.

The abbreviated name in English is CeMI.

ARTICLE 3

The seat of CeMI is in Podgorica.

ARTICLE 4

The work of CeMI is public.

Publicity of work is ensured through press releases and through the publication, on the Association's website, of the annual financial report and other information of importance for the work of the Association.

ARTICLE 5

The Association is established for an indefinite period.

VISION, MISSION, GOALS

ARTICLE 6

Vision of the Association: Montenegro as a country of free citizens, social justice, the rule of law and equal opportunities.

Mission of the Association: CeMI is a think-tank organisation whose mission is to provide continuous support to reforms and to the strengthening of the institutions of the political system and of civil society organisations, by proposing public policies and monitoring their implementation in the fields of respect for human rights and freedoms, European integration and the fight against corruption in Montenegro.

The goals of the Association are:

- contributing to the effective implementation of public policies and of international obligations undertaken in the fields of protection of human rights and freedoms, European integration and the fight against corruption;
- contributing to the harmonisation of the national legislative and institutional framework with the requirements of the EU accession process;
- improving public information and education on the protection of human rights and freedoms, European integration and the fight against corruption;
- contributing to improving the efficiency of institutions dealing with the protection of human rights and freedoms, European integration and the fight against corruption;
- increasing the transparency of the institutions of the political system and of civil society organisations;
- contributing to the improvement and affirmation of freedom of expression and of the media;
- contributing to the harmonisation of the national legislative and institutional framework in the field of consumer protection;
- improving citizens' information and education on consumer rights;
- contributing to the harmonisation of the national legislative and institutional framework in the field of protection of patients' rights;
- improving citizens' information and education on patients' rights;
- improving citizens' information and education on NATO integration, foreign policy, security and defence;
- contributing to the education of young people, to the improvement of their position and employability in society, and to the improvement of youth policies;
- contributing to the harmonisation of the national legislative and institutional framework with European and international standards in the field of protection of the rights of all marginalised groups, with special emphasis on improving the protection of the rights, position and employability of LGBTQ persons and persons with disabilities;
- contributing to the harmonisation of the national legislative and institutional framework with European and international standards in the field of protection of the rights of minorities and of marginalised and particularly vulnerable groups (women, the elderly, pensioners with low incomes, persons with disabilities, refugees and internally displaced persons, persons living with HIV/AIDS, and the Roma and Egyptian minorities), as well as supporting the prevention and treatment of HIV/AIDS and supporting drug users;
- contributing to the harmonisation of the national legislative and institutional framework with European and international standards in the field of electoral legislation;
- contributing to the harmonisation of the national legislative and institutional framework with European and international standards in the field of judicial reform, and to improving the accountability and professionalism of judicial office holders;

- improving citizens' information and education on free legal aid;
- contributing to regional development and to the improvement of the investment environment through activities that promote sustainable economic development, the attraction of investment and the balanced development of local communities.

CeMI achieves its programme goals through its overall activity in public life.

ACTIVITIES

ARTICLE 7

The activities of the Association are:

- 5811 Book publishing
- 5813 Publishing of newspapers
- 5814 Publishing of journals and periodicals
- 5920 Sound recording and music publishing activities
- 5819 Other publishing activities
- 7320 Market research and public opinion polling
- 7021 Public relations and communication activities
- 7311 Advertising agencies

The predominant economic activity is 58.19 Other publishing activities.

ARTICLE 8

CeMI has a seal and a stamp, made in the Latin script.

The seal of CeMI is elliptical in shape and contains the name in Montenegrin and in English.

The stamp of CeMI is rectangular in shape and contains the name in Montenegrin, a field for the reference number and a field for the date.

CeMI has an emblem, which is determined by a separate decision of the Governing Board.

The manner in which the CeMI emblem is used is determined by the President of the Governing Board or by the person authorised to represent CeMI.

INTERNAL ORGANISATION

ARTICLE 9

The bodies of the Association are the Assembly, the Governing Board and the person authorised to represent the Association.

ASSEMBLY

ARTICLE 10

The Assembly is the highest governing body of the Association.

ARTICLE 11

The Assembly consists of all members of the Association.

ARTICLE 12

The Assembly has the following powers:

- it determines the programme goals;
- it elects and dismisses the President of the Association;
- it elects and dismisses the Governing Board on the proposal of the President of the Association;
- it elects and dismisses the person authorised to represent the Association;
- it adopts the annual report on the work of the Governing Board;
- it decides on the seat and address of CeMI;
- it decides on amendments to the Statute and on the adoption of a new Statute;
- it adopts its Rules of Procedure;
- it decides on the dissolution of CeMI;
- it decides on other matters in respect of which the Statute does not establish the competence of other bodies of the Association.

ARTICLE 13**Convening of the Assembly**

The Assembly may be regular or extraordinary.

The Assembly meets in regular session once a year.

An extraordinary session of the Assembly may be convened on the initiative of at least one third of the members, no later than 30 days from the date of submission of the request for it to be convened.

A session of the Assembly is convened by written notice stating the place and time of the session, together with the proposed agenda. The session is chaired by a person elected by public vote at the beginning of the session.

ARTICLE 14**Quorum and decision-making**

The Assembly may sit and take decisions if fifty per cent plus one (an absolute majority) of the members of the Association are present.

The Assembly may sit and take decisions if it is attended by members of the Association who are authorised representatives of more than fifty per cent of the total number of members.

ARTICLE 15

Where the Assembly cannot be held owing to a lack of quorum, it shall be convened again within seven days, with the same agenda.

ARTICLE 16

The Assembly decides on the adoption of the Statute and on amendments to it by a two-thirds majority of the votes of the members of the Association present or represented by proxy.

The initiative to start the procedure for amending the Statute may be launched by any member of the Assembly or by the person authorised to represent the Association.

ARTICLE 17

The Assembly decides on other matters within its competence by a majority of the votes of the members of the Association present.

ARTICLE 18**Manner of decision-making**

The Assembly decides by public vote. Public voting is carried out by a show of hands or by roll call of the members.

ARTICLE 19

The Assembly decides on particular matters by secret ballot where this is requested by at least fifty per cent plus one of the members of the Association.

Secret voting is carried out by means of ballot papers.

ARTICLE 20

An absent member may also vote in writing.

A letter by which an absent member votes on items on the agenda is valid and shall be taken into account if it reaches the Assembly before the session is held.

The chairperson shall inform the members present of how the absent member voted.

ARTICLE 21**Exclusion of voting rights**

A member of the Assembly shall not vote when decisions are taken concerning:

- the release of that member from certain obligations and liabilities;
- the establishment of claims that the Association has against that member;
- the initiation of, or withdrawal from, a dispute against that member;
- other cases in which the member has an interest contrary to the interest of the Association.

Whether the interest of a member referred to in paragraph 4 of this Article is contrary to the interest of the Association shall be assessed by the Assembly in each specific case.

The exclusion of a member's voting rights applies only to the matter that gave rise to the exclusion.

ARTICLE 22**Minutes of the Assembly**

Minutes are kept of every session of the Assembly.

The minutes record the basic information on the work of the Assembly, in particular:

- the place and date of the session;
- the agenda;
- the names of the members present;
- the name of the chairperson;
- the name of the minute-taker;
- the course of the session, in particular the matters discussed, the names of the persons who took part in the discussion and a summary of their statements;
- the result of the vote on each item of the agenda;
- the chairperson's statement on the adoption of decisions;

- dissenting opinions of members;
- the time at which the session closed.

ARTICLE 23

Every decision of the Assembly is entered in the minutes.

Evidence that the Assembly was duly convened is attached to the minutes.

ARTICLE 24

The minutes are signed by the chairperson of the Assembly and the minute-taker.

Where the minutes consist of several pages, the chairperson and the minute-taker shall initial each page.

ARTICLE 25

Members of the Assembly are entitled to inspect the minutes once they have been drawn up and signed by the chairperson and the minute-taker.

The minutes of the Assembly are kept in the archives of the Association as documents of permanent value.

GOVERNING BOARD

ARTICLE 26

The Governing Board is one of the governing bodies of CeMI.

The Governing Board is accountable for its work to the Assembly of CeMI.

The Governing Board may, as necessary, set up commissions and other working bodies, whose members need not be members of the Governing Board.

ARTICLE 27

Sessions of the Governing Board are chaired by the President of the Association.

The composition and number of members of the Governing Board are determined by the Assembly.

The Governing Board adopts Rules of Procedure governing its work.

ARTICLE 28

The Governing Board:

- implements the programme goals;
- adopts and implements annual programmes and work plans;
- establishes special bodies to support the planned programmes;
- decides on publishing activities and on the performance of other economic activities;
- adopts the annual financial plan;
- manages the assets of the Association;
- decides on the keeping of accounting records;
- decides on engaging an external audit;
- determines the systematisation of job positions;
- submits the annual report on its work to the Assembly;
- decides on the amount of the annual membership fee;

- adopts general legal acts;
- adopts Rules of Procedure governing its work;
- decides on the termination of membership of a member of the Association;
- decides on other matters within its competence under the Statute of CeMI.

The Governing Board has from 5 (five) to 7 (seven) members, including the President of the Governing Board.

The term of office of the members of the Governing Board is 4 (four) years and may be renewed.

The Governing Board is convened as necessary.

The President of the Governing Board convenes and chairs the sessions of the Governing Board.

PRESIDENT OF THE ASSOCIATION – PERSON AUTHORISED TO REPRESENT

ARTICLE 29

The person authorised to represent the Association is elected by decision of the Assembly of the Association for a term of 4 (four) years.

The person authorised to represent the Association is the President of the Association.

The decision on appointment determines the date on which the President of the Association takes office.

ARTICLE 30

Powers of the person authorised to represent the Association

The person authorised to represent the Association:

- concludes contracts and undertakes other legal actions in the name and on behalf of the Association;
- is responsible for the lawfulness of the Association's work;
- manages the affairs of the Association in accordance with the decisions of the Assembly;
- submits the proposed annual financial report to the Assembly;
- performs other tasks in accordance with the law, the Statute and other acts of the Association.

ARTICLE 31

Accountability of the person authorised to represent the Association

The person authorised to represent the Association is accountable for their work to the Assembly and shall periodically submit reports on their work to it.

For each session of the Assembly of the Association, the person authorised to represent the Association shall submit a report on their work for the period between two sessions.

ARTICLE 32

Dismissal of the person authorised to represent the Association

The President may be dismissed in the following cases:

- 1) where there are losses in the operations of the Association;
- 2) where, through negligent or unprofessional work or by exceeding their powers, they cause damage to the Association, or where damage could have arisen as a result;
- 3) owing to inability to organise and manage the tasks entrusted to them and the tasks within their competence.

ARTICLE 33

The Assembly of the Association decides on the dismissal of the President.

The decision of the Assembly of the Association on the dismissal of the President is final.

MANAGEMENT

ARTICLE 34**Executive Director**

The Executive Director is responsible for directing the management of the Association.

The term of office of the Executive Director is 2 (two) years and may be renewed.

The Executive Director performs the following tasks:

- represents CeMI before the competent state institutions, on the authorisation of the President of the Association;
- carries out payment transactions on the order of the President of the Association;
- ensures the proper administrative and technical functioning of CeMI and performs all necessary tasks on the authorisation of the President of the Governing Board;
- oversees the achievement of programme, financial and administrative goals;
- develops and applies the rulebooks, policies and procedures of the Association;
- writes and implements projects;
- monitors the fulfilment of contractual obligations;
- selects management staff, and plans and implements human resources policy;
- manages the management team and other employed staff;
- signs contracts with donors and partners;
- advertises vacancies, selects and engages staff;
- assesses employees' needs for additional training, and plans and organises training;
- improves the systems and procedures for the evaluation and motivation of employees;
- collects and analyses data relating to human resources issues and prepares appropriate proposals;
- identifies problems at work that negatively affect the working atmosphere and the productivity of employees;
- communicates with programme managers in order to find effective solutions to existing problems in the area of interpersonal relations;
- organises the induction of new members;
- keeps records of the admission of new members, promotions, transfers, performance reviews and dismissals;
- implements the incentive system.

ARTICLE 35**Programme Director**

The Programme Director is responsible for managing the individual programmes of CeMI.

The Programme Director performs the following tasks:

- oversees the achievement of the goals of individual programmes;
- develops, promotes and implements programmes and monitors their implementation;

- writes and implements projects;
- plans and budgets projects;
- coordinates work on projects;
- writes programme reports;
- complies with the reporting procedures required by contracts with donors and clients;
- participates in the evaluation of the work of the members of the Association.

ARTICLE 36

Financial Manager

The Financial Manager performs the following tasks:

- organises and supervises the functioning of the office;
- develops an accurate and precise financial management system;
- develops an accurate and precise archiving system for financial operations;
- develops financial policies and procedures;
- develops all payment forms, contracts and other documents for the Association;
- develops a precise, accurate and comprehensible bookkeeping system;
- plans and budgets projects;
- organises and writes financial reports;
- maintains the regular financial transactions of the Association in accordance with the approved financial system and the relevant documents;
- organises and maintains written correspondence relating to financial matters in the Association;
- completes all required forms and makes payments for the Association;
- develops and keeps electronic and printed documentation and a database of all financial transactions;
- provides technical assistance in the field of finance to executive staff where necessary and on request;
- keeps records of all financial transactions and grants received by the Association in accordance with the procedures, regulations and documentation required by donors;
- provides information on allowances for equipment, furniture and various office supplies through precise cost accounting;
- secures the budget and submits cash advance requests within the established time frames.

STAFF

ARTICLE 37

Staff shall be employed in accordance with the law, pursuant to the Act on the Systematisation of Job Positions adopted by the Assembly of the Association.

AFFILIATION

ARTICLE 38

The Association may affiliate with, and join, federations or other appropriate associations in Montenegro and abroad.

FINANCING

ARTICLE 39

The Association acquires assets from membership fees, voluntary contributions, gifts, donations, legacies, interest on deposits, dividends, rent, income from economic activities and in any other manner not contrary to law.

PERFORMANCE OF ECONOMIC ACTIVITIES

ARTICLE 40

CeMI performs the following economic activities:

- 5811 Book publishing
- 5813 Publishing of newspapers
- 5814 Publishing of journals and periodicals
- 5920 Sound recording and music publishing activities
- 5819 Other publishing activities
- 7320 Market research and public opinion polling
- 7021 Public relations and communication activities
- 7311 Advertising agencies

The predominant economic activity is 58.19 Other publishing activities.

MEMBERSHIP OF THE ORGANISATION

ARTICLE 41

Any legal or natural person who accepts the goals and activities defined by the Statute of the Association may become a member of the Association on the recommendation of one of its members.

The decision on admission to membership is taken by the Assembly of the Association by a majority of votes.

Membership is acquired by signing a membership application.

A register of members is kept for the purpose of recording the members of the Association.

TERMINATION OF MEMBERSHIP

ARTICLE 42

A member may withdraw from membership by submitting a written statement of withdrawal.

Membership of the Association also terminates by decision of the Governing Board in the event of non-compliance with the provisions of this Statute or of damage to the reputation of the Association.

An initiative for exclusion from the Association may be submitted by any member of the Association.

The member concerned shall be given the opportunity to state their position on the reasons for which the proposal to terminate their membership of the Association was submitted.

RIGHTS AND OBLIGATIONS OF MEMBERS

ARTICLE 43

A member is entitled to:

- 1) participate, on an equal footing with other members, in achieving the goals of the Association;
- 2) participate directly in decision-making at the Assembly, and through the bodies of the Association;
- 3) elect and be elected to the bodies of the Association;
- 4) be informed in a timely and complete manner about the work and activities of the Association.

A member shall:

- 1) actively contribute to achieving the goals of the Association;
- 2) participate, in accordance with their interests, in the activities of the Association;
- 3) pay the membership fee;
- 4) perform other tasks entrusted to them by the Assembly of the Association.

TRANSITIONAL AND FINAL PROVISIONS

ARTICLE 44

The initiative to start the procedure for the dissolution of the Association may be launched by one third of the members of the Assembly.

The Assembly decides on the dissolution of the Association by a two-thirds majority of the votes of the members of the Association present.

ARTICLE 45

In the event of the dissolution of the Association, the decision on the disposal of its assets is taken by the Assembly by a two-thirds majority of all members.

ARTICLE 46

The provisions of the Law on Non-Governmental Organisations shall apply directly to all matters not regulated by this Statute.

ARTICLE 47

This Statute enters into force on the day of its adoption by the Assembly.

Upon the entry into force of this Statute, the Statute of the NGO Centre for Monitoring and Research CeMI of January 2022 ceases to have effect.

ARTICLE 48

The Statute of the NGO Centre for Monitoring and Research was adopted at the session of the Assembly of the NGO Centre for Monitoring and Research held on 7 March 2000, and Amendments to the Statute were adopted at the sessions of the Assembly held on 15 October 2008, 28 July 2012, 23 May 2018, 3 February 2020, 17 January 2022 and 12 January 2023.

Podgorica, 3 July 2025

01

RULES

RULES OF PROCEDURE OF THE CENTRE FOR MONITORING AND RESEARCH CEMI



RULES

Rules of Procedure of the Centre for Monitoring and Research CeMI

Adopted in January 2018, updated February 2026

Pursuant to Article 28, paragraph 1, indent 12 of the Statute of the NGO Centre for Monitoring and Research (hereinafter: "the Organisation"), the Governing Board (hereinafter: "the GB") hereby adopts the Rules of Procedure of the Centre for Monitoring and Research CeMI.

GENERAL PROVISION

ARTICLE 1

General provision

These Rules of Procedure (hereinafter: "the Rules") are a general act of the Organisation which regulates the internal organisation, the working methods and the rights and obligations of engaged persons, in accordance with the Statute of the Centre for Monitoring and Research (hereinafter: "CeMI" and "the Statute" respectively).

In these Rules, "President of the GB" means the President of the Governing Board, who under Articles 27–29 of the Statute is also the President of the Association and the person authorised to represent CeMI.

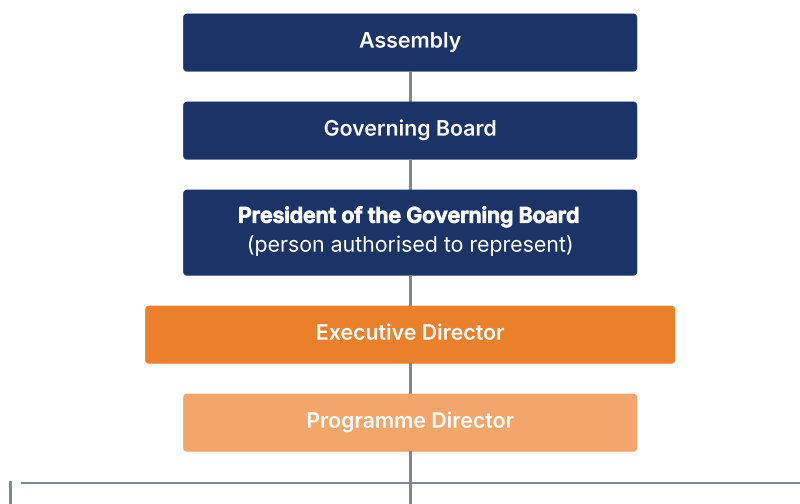
The Statute prevails over these Rules and over all other general acts of CeMI. The policies, rulebooks and procedures adopted by the Governing Board regulate specific matters in greater detail and shall be applied consistently with the Statute and these Rules.

These Rules may not be amended without fifteen days' prior notice. All amendments are adopted by the Governing Board in accordance with Article 28 of the Statute.

ORGANISATIONAL STRUCTURE

ARTICLE 2

Structure of the Organisation



Finance and Public Relations
Department

Public Policy Research
Department

Legal Department

ARTICLE 3

Executive Director

The Executive Director directs the management of the association and performs the tasks set out in Article 34 of the Statute.

In accordance with Articles 12 and 34 of the Statute, the Executive Director is appointed and dismissed by the Assembly for a term of two years, which may be renewed.

The Executive Director coordinates the work of all departments.

At meetings, decisions are taken on the work of the Organisation, and Heads of Department assume responsibility and evaluate the work done.

The Executive Director, together with the President of the Governing Board, is responsible for the overall performance of the Organisation.

The Executive Director is directly responsible for the quality and pace of project implementation, including reporting to donors.

On the authority of the President of the Governing Board, the Executive Director represents CeMI before the competent state institutions, executes payment transactions and signs contracts with donors and partners (Articles 30 and 34 of the Statute).

The Executive Director may, with the consent of the President of the GB, suspend the execution of any operational decision taken in the course of the management of the Organisation where the Executive Director considers it contrary to the interests of the Organisation, pending a decision of the competent body. This power does not extend to decisions of the Assembly or the Governing Board.

The Executive Director may, as necessary, hold meetings with individual employees and with all employees.

Pending the appointment of the Executive Director, or during a prolonged absence of the Executive Director, the competences of the Executive Director are exercised by the President of the GB in accordance with Article 30 of the Statute. The President of the GB may, by written authorisation, delegate individual tasks (such as signing donor reports or approving project budgets) to the Programme Director or to a Head of Department.

The Assembly may appoint an Acting Executive Director pending the appointment of the Executive Director.

While the President of the GB exercises the competences of the Executive Director, decisions on disciplinary measures are taken by the Governing Board without the participation of the President, and the duties of the Responsible Person under the SEAH Rulebook are performed by the Head of the Legal Department, in accordance with Article 18a of these Rules.

ARTICLE 3A

Programme Director

The Programme Director is responsible for managing the individual programmes of CeMI and performs the tasks set out in Article 35 of the Statute.

The Programme Director coordinates the programme work of the departments, oversees the achievement of the objectives of individual programmes and participates in evaluating the work of members of the Organisation.

The Programme Director is accountable to the Executive Director for their work and is a member of the Collegium.

ARTICLE 4**Collegium**

The Executive Director convenes weekly joint meetings attended by the President of the GB, the Programme Director and the Heads of Department (hereinafter: "the Collegium").

The Collegium consists of the President of the Governing Board, the Executive Director, the Programme Director and the Heads of Department.

Other persons whom the Executive Director and the President of the Governing Board consider necessary may also attend meetings of the Collegium at the invitation of the Executive Director.

The Collegium functions as an advisory working body within the meaning of Article 26 of the Statute.

The final decision on operational matters discussed at the Collegium is taken by the President of the GB on the proposal of the Executive Director, without prejudice to the competences of the Assembly and the Governing Board under Articles 12 and 28 of the Statute.

ARTICLE 5**Departments**

The work of CeMI is organised through three departments:

1. Finance and Public Relations Department;
2. Public Policy Research Department;
3. Legal Department.

ARTICLE 6**Management of departments**

The departments are managed by Heads of Department.

Only a person who has at least three years of work experience in the Organisation, or two years of experience in similar work outside the Organisation, and who meets the other requirements prescribed for the position may be appointed Head of Department.

A person who coordinates a department but has less than the prescribed experience may be appointed Acting Head of Department until they acquire the prescribed work experience.

FINANCE AND PUBLIC RELATIONS DEPARTMENT**ARTICLE 7****Competences of the Finance and Public Relations Department**

The Finance and Public Relations Department covers all activities in the fields of:

- (1) finance;
- (2) procurement and logistics; and
- (3) public relations.

Within the Organisation, the Department performs the following activities:

FINANCE

- a. Participates in drafting and implementing projects;
- b. Prepares the budget in accordance with the Rules;

PROCUREMENT AND LOGISTICS

- a. Conducts procurement in accordance with donor rules and the internal rules of CeMI;

PUBLIC RELATIONS

- a. Organises press conferences;
- b. Maintains the website and the organisation's social media profiles;

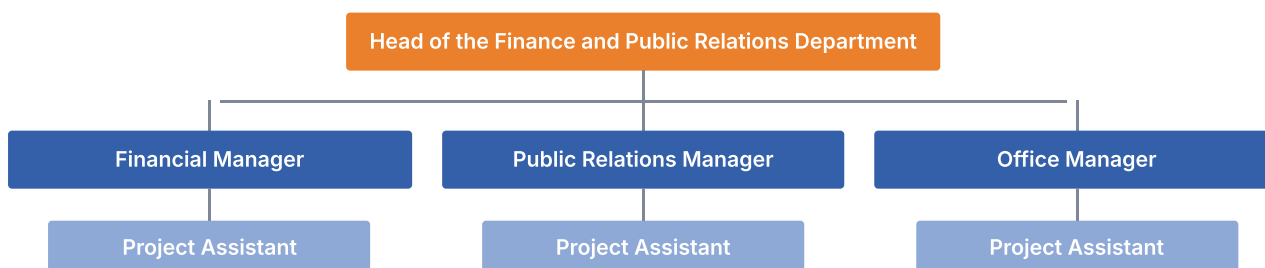
- c. Draws up a monthly plan of financial transactions;
- d. Prepares all financial plans;
- e. Prepares the cash flow plan and monitors its implementation;
- f. Prepares financial reports on projects;
- g. Executes all transactions;
- h. Keeps the books of account and financial project documentation;
- i. Manages the treasury.

- b. Carries out procurement quality control;
- c. Monitors compliance with delivery deadlines for goods and services;
- d. Draws up and updates the list of suppliers;
- e. Organises seminars, round tables and other project events in cooperation with project personnel;
- f. Communicates with suppliers and obtains offers.

- c. Compiles and updates the media list;
- d. Organises the issuing of bulletins;
- e. Organises campaigns whenever necessary;
- f. Designs and plans the means of communication with the public;
- g. Prepares monthly communication plans and produces informational, educational and communication material;
- h. Designs campaigns and the organisation's image and submits them to the Collegium for approval;
- i. Lobbies journalists and builds a network of journalists who regularly report on CeMI's activities;
- j. Organises the organisation's public representation;
- k. Produces the organisation's annual report;
- l. Approves the final version of books and publications as regards design, visibility rules and CeMI's contractual obligations towards the donor; the Department is not responsible for the content itself, which is the responsibility of the person in charge of the project;
- m. Prepares press clippings;
- n. Coordinates media appearances by CeMI representatives;
- o. Approves all communication with the public;
- p. Is responsible for all information that CeMI receives;
- q. Monitors the media and, where necessary, prepares a timely response.

ARTICLE 8

Structure of the Finance and Public Relations Department



ARTICLE 9

Obligations and responsibilities of the Head of the Finance and Public Relations Department

The Head of Department performs the following tasks:

- a. coordinates the work of the Department;
- b. manages human resources within the Department;
- c. defines priorities and manages risks;
- d. where it becomes apparent that the Organisation will face financial difficulties in a given period, cooperates with other employees of the Organisation in order to resolve those difficulties;
- e. is entitled to form teams and to determine the rules of work within them;
- f. is responsible for the public image of CeMI;
- g. is responsible for the accuracy of financial reports;
- h. is responsible for the regularity of the procurement procedures conducted;
- i. carries out activities in the fields falling within the competences of the Department.

ARTICLE 10

Obligations and responsibilities of the Financial Manager

The Financial Manager carries out, and is responsible for:

- a. all types of payments;
- b. all types of project financial reporting;
- c. treasury management;
- d. accounting;
- e. activities in the field of finance falling within the competences of the Department;
- f. the other tasks of the Financial Manager set out in Article 36 of the Statute.

ARTICLE 11

Obligations and responsibilities of the Public Relations Manager

The Public Relations Manager carries out, and is responsible for:

- a. representing CeMI in public;
- b. internal and external communication in accordance with Article 7 of these Rules and the communication plan;
- c. activities in the field of public relations falling within the competences of the Department.

ARTICLE 12

Obligations and responsibilities of the Office Manager

The Office Manager:

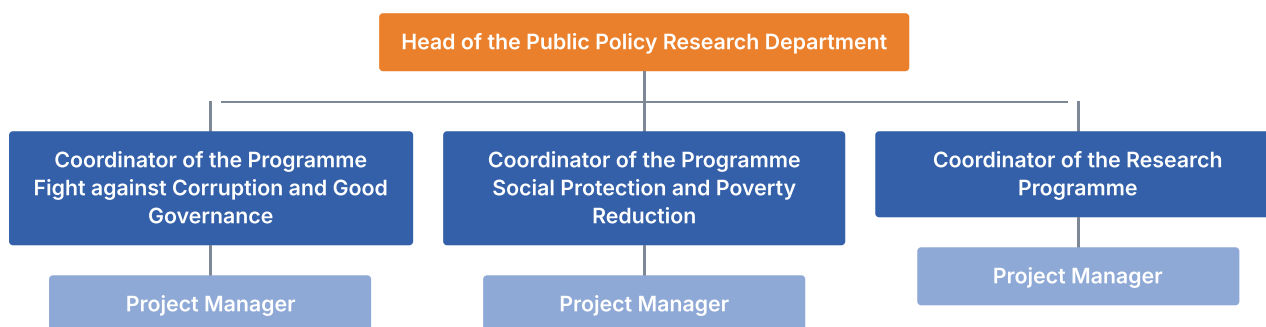
- a. coordinates and performs office work;
- b. schedules and organises meetings in the country and abroad;
- c. ensures the efficient flow of information among employees;
- d. receives and forwards documentation for current projects;
- e. establishes good working relations and maintains daily communication with partners;
- f. attends to day-to-day office needs, including the procurement of office supplies;
- g. provides logistical support to employees in implementing project activities;
- h. assists in organising events, meetings and team-building activities;
- i. assists the Financial Manager in managing the treasury and in preparing payments;
- j. assists the Financial Manager in compiling financial reports;

- k. carries out activities in the procurement and logistics areas falling within the competences of the Department, in accordance with the instructions of the Head of the Finance and Public Relations Department or the Financial Manager.

PUBLIC POLICY RESEARCH DEPARTMENT

ARTICLE 13

Structure of the Public Policy Research Department



ARTICLE 14

Competences of the Public Policy Research Department

The Public Policy Research Department is responsible for:

1. all active projects falling within the Department;
2. public policy analysis in the fields of the fight against corruption and good governance;
3. monitoring the implementation of government policies in the fields of the fight against corruption and good governance;
4. preparing public policy proposals;
5. quantitative and qualitative research for the needs of projects and of clients.

ARTICLE 15

Obligations and responsibilities of the Head of the Public Policy Research Department

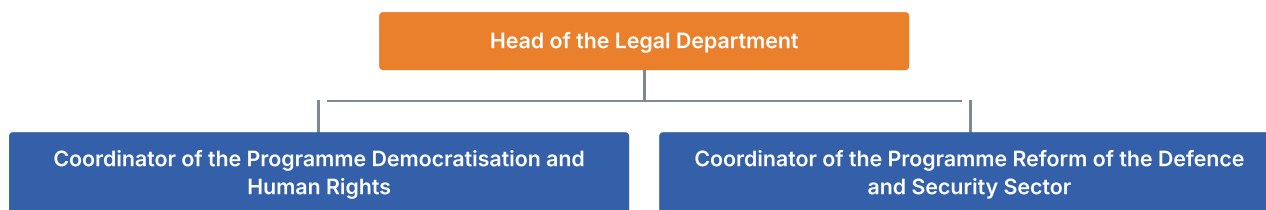
The Head of the Public Policy Research Department performs the following tasks:

- (1) coordinates the work of the Department;
- (2) manages human resources within the Department;
- (3) determines priorities and manages risks;
- (4) is entitled to form teams and to determine the rules of work within them;
- (5) carries out activities in the fields falling within the competences of the Department;
- (6) takes part in drafting and implementing projects;
- (7) is responsible for the results of the Department's fundraising work;
- (8) participates actively in the recruitment process, in cooperation with other responsible persons in the Organisation.

LEGAL DEPARTMENT

ARTICLE 16

Structure of the Legal Department



ARTICLE 17

Competences of the Legal Department

The Legal Department is responsible for:

- (1) all active projects falling within the Department;
- (2) public policy analysis in the fields of democratisation, human rights and the rule of law;
- (3) monitoring the implementation of government public policies in the fields of democratisation, human rights and the rule of law;
- (4) preparing proposals for specific normative solutions to be submitted, in the form of recommendations, to those responsible for public policy in Montenegro;
- (5) monitoring the electoral process and its regularity;
- (6) monitoring and managing all project activities in the fields of democratisation, human rights and the rule of law;
- (7) legal support to the Finance and Public Relations Department;
- (8) performing other legal tasks for the needs of other departments;
- (9) performing the integrity, compliance and safeguarding functions referred to in Article 18a of these Rules.

ARTICLE 18

Obligations and responsibilities of the Head of the Legal Department

The Head of Department performs the following tasks:

- (1) coordinates the work of the Department;
- (2) manages human resources within the Department;
- (3) determines priorities and manages risks;
- (4) is entitled to form teams and to determine the rules of work within them;
- (5) carries out activities in the fields falling within the competences of the Department;
- (6) takes part in drafting and implementing projects;
- (7) is responsible for the results of fundraising for the work of the Department;
- (8) participates actively in the recruitment process, in cooperation with other responsible persons in the Organisation.

ARTICLE 18A**Integrity, safeguarding and data protection functions**

- (1) The Head of the Legal Department acts as the Integrity and Compliance Officer. The Integrity and Compliance Officer receives and handles reports under the Whistleblowing Policy, maintains the Integrity Case Register, the Conflict of Interest Register and the Gifts and Hospitality Register, and coordinates the Fraud Response Plan.
- (2) The Legal Department performs the role of Safeguarding Focal Point under the Safeguarding Policy and receives reports under the SEAH Rulebook. The Executive Director appoints a deputy Safeguarding Focal Point by written decision.
- (3) The Responsible Person under the SEAH Rulebook is the Executive Director.
- (4) The Governing Board appoints a Board Safeguarding Lead from among its members, in accordance with Article 28 of the Statute.
- (5) The Executive Director designates the Data Protection Officer by written decision.
- (6) Reports concerning the Executive Director or the Head of the Legal Department are handled by the President of the GB and, in safeguarding and SEAH matters, by the Board Safeguarding Lead. Reports concerning the President of the GB are handled by the Governing Board without the participation of the President.
- (7) **Decisions on the dismissal of the Executive Director and of the President of the Governing Board are taken by the Assembly in accordance with Articles 12, 32, 33 and 34 of the Statute.**
- (8) Where the post of Executive Director is vacant and its competences are exercised by the President of the GB (Article 3 of these Rules), the Head of the Legal Department acts as the Responsible Person under the SEAH Rulebook and appoints the deputy Safeguarding Focal Point, and the Data Protection Officer is designated by the President of the GB. Reports concerning the Head of the Legal Department are handled by the Board Safeguarding Lead, and reports concerning the President of the GB by the Governing Board without the participation of the President.

PROJECT STAFF**ARTICLE 19****Programme Coordinator**

Depending on the needs and possibilities within departments, projects may be implemented through programmes.

Heads of Department may propose the appointment of a Programme Coordinator to coordinate the implementation of one or more projects within a particular programme. The Programme Coordinator is appointed by the Executive Director.

A research programme involving the direct implementation of quantitative and qualitative research is an exception to the project-based concept of a programme.

The Programme Coordinator is directly responsible to the Head of the Department within which the project activities are carried out.

ARTICLE 20**Project Manager**

Depending on needs and possibilities, each Head of Department may have a Project Manager to coordinate the implementation of one or more projects within the remit of that department. The Project Manager is appointed by the Executive Director.

The Project Manager is directly responsible to the Head of Department or, as the case may be, to the Programme Coordinator within whose programme the project activities are carried out.

ARTICLE 21

Project Assistant

A Project Assistant is a person engaged in implementing project activities within the Organisation. All interns and scholarship holders have the status of Project Assistant.

The Project Assistant is responsible to the Head of Department, the Programme Coordinator and the Project Manager.

A Project Assistant may also be assigned to the Finance and Public Relations Department.

ARTICLE 22

External project associates

Depending on needs and capacities, a Head of Department may, with the agreement of the Collegium, form a wider team of associates and delegate certain powers to it.

The team referred to in the preceding paragraph may consist of external project associates. The hierarchy among members of the team of associates is based on the length of their engagement with the Organisation, their level of education and their contribution to the development of the Organisation.

The hierarchy within the team of associates is determined by the Executive Director on the proposal of the Heads of Department.

OBLIGATIONS AND RESPONSIBILITIES OF PERSONS WORKING FOR THE ORGANISATION

ARTICLE 23

Work reports

Persons working for the Organisation shall submit a written work report to the Executive Director at the end of each month, save for Project Assistants, who shall do so weekly.

All persons involved in projects shall keep a single monthly timesheet covering all projects, showing the time spent on each project and its source of funding, completed weekly and approved by the supervisor.

A member of the Collegium who fails to submit the monthly work report by the last day of the month concerned may be held liable in accordance with Article 25 of these Rules.

The work report shall contain a list of all activities carried out by the employee during the month and a list of the activities carried over to the next period.

ARTICLE 24

Responsibility

Responsibility for work within the Organisation is solely individual.

Neither blame nor success shall be attributed collectively.

Tasks are assumed in accordance with the hierarchy.

Heads of Department are responsible to the Executive Director for operational work in the Organisation and, in programme matters, act in coordination with the Programme Director.

DISCIPLINARY PROVISIONS

ARTICLE 25

Sanctions

Measures for breaches of work obligations may be proposed, in writing and with a statement of reasons, by:

1. the President of the GB, in respect of all persons in the Organisation;
2. the Executive Director, in respect of the Programme Director, Heads of Department, Programme Coordinators and other persons;
3. Heads of Department, in respect of members of the teams they manage.

Liability is established in the procedure set out in the Complaints, Investigation and Disciplinary Procedure. The Executive Director decides on the measure in accordance with Article 34 of the Statute, and the decision is confirmed by the President of the GB.

The following measures may be imposed on employees in accordance with the Labour Law and the employment contract:

1. a written warning;
2. a final written warning;
3. a pecuniary measure, only to the extent and in the manner permitted by labour legislation and the employment contract;
4. termination of the employment contract, for the most serious breaches of the Organisation's principles or where it is evident that the measures referred to in points 1 to 3 of this paragraph will not result in the proper, professional and conscientious performance of work and project activities.

Where the Executive Director is the subject of the procedure, the measure is decided by the Governing Board; where the President of the GB is the subject, or where the President exercises the competences of the Executive Director (Article 3 of these Rules), the measure is decided by the Governing Board without the participation of the President (Article 18a of these Rules and Article 11 of the Complaints, Investigation and Disciplinary Procedure).

Decisions on measures shall be communicated in writing to the person concerned and recorded in their personnel file, and shall not be made public.

Termination of the membership of a member of the association is decided by the Governing Board after the member has been given an opportunity to state their position (Article 42 of the Statute). The President of the Governing Board may be dismissed only by the Assembly, in accordance with Articles 32 and 33 of the Statute.

ARTICLE 26

Legal remedy

The person against whom a decision has been taken under Article 25 of these Rules is entitled to appeal within 8 days of receipt of the decision.

The appeal shall be submitted in writing.

The appeal shall be decided within 15 working days by three members of the Governing Board who did not take part in the first-instance decision, in accordance with the Complaints, Investigation and Disciplinary Procedure. The President of the GB, having confirmed the first-instance decision, shall not take part in deciding on the appeal. Where the first-instance decision was taken by the Governing Board, the appeal is decided by the Assembly.

Only the person against whom the decision has been taken is entitled to appeal.

The decision on the appeal is final within CeMI. The internal appeal is without prejudice to the statutory time limits for seeking protection before the competent court or the Agency for Peaceful Settlement of Labour Disputes.

REWARD POLICY

ARTICLE 27

Incentives

Employees shall be rewarded for their work in accordance with their performance. It is desirable that employees be incentivised through material and other benefits.

An incentive may be proposed by the President of the GB, the Executive Director or the Head of Department.

The person who wrote a project approved for CeMI shall receive an incentive amounting to 1% to 2% of the funds allocated to the Organisation under that project (i.e. the total project budget less the funds allocated to other organisations engaged on the project).

Proposals may be made orally or in writing.

The final decision is taken by the President of the GB, within the annual financial plan adopted by the Governing Board. The Executive Director implements the incentive scheme in accordance with Article 34 of the Statute.

WORKING HOURS AND SALARIES

ARTICLE 28

Working hours, remuneration and activities

The working hours of the Organisation are from 8 am to 4 pm on working days.

In the recruitment process, the President of the GB and the Executive Director may agree special working hours with the person engaged.

Where the needs of the Organisation so require, overtime work may be ordered in writing, in exceptional cases and within the limits set by the Labour Law.

No one shall be overburdened with work. An employee who considers that they have more obligations than can physically be completed during working hours is entitled to give timely notice, with reasons, of their inability to fulfil the obligation within the deadline.

Heads of Department shall subsequently assess the performance of each person in the Organisation and take appropriate decisions as provided in the chapters on incentives or sanctions.

Overtime work shall be recorded in timesheets and compensated in accordance with the Labour Law and the Human Resources Policy.

The Organisation shall provide all employees with the material conditions for work.

The amount of the salary is determined upon conclusion of the contract between the Organisation and the person engaged.

Salaries shall be paid monthly, between the 1st and the 10th of the month for the preceding month, in accordance with Article 17 of the Rulebook on Financial Operations and Procurement. At the employee's request, part of the salary may be paid as an advance in the middle of the month.

COMMUNICATION

ARTICLE 29

Communication

Communication within the Organisation is free, within the limits of respect for personal integrity.

All forms of communication are welcome.

Anonymous communication is not permitted, save for reports made under the Whistleblowing Policy, the Safeguarding Policy and the SEAH Rulebook.

Software tools containing task lists and tracking the fulfilment of obligations constitute a further form of communication.

The software tools are administered by the Executive Director.

FUNDRAISING

ARTICLE 30

Fundraising through project applications

Projects are the activities through which the Organisation carries out its work.

Any employee may design and write a project and submit it for implementation as provided for by the Statute and other acts of the Organisation.

The person in charge of a project is entitled to be its Project Manager.

Any employee may lobby for a project outside the Organisation, but only with the express approval of the President of the GB or the Executive Director and in coordination with the other activities of the Organisation.

Applications are made in accordance with the rules of the Organisation and of the donor organisation.

An application made outside the Organisation's rules shall not be considered a project of the Organisation, and the provisions of these Rules on sanctions shall apply to any employee responsible for it.

The President of the GB proposes an annual fundraising plan as part of the annual programme and work plan adopted by the Governing Board (Article 28 of the Statute), and organises the Organisation's resources for its implementation.

For the needs of a project, external associates may be engaged for remuneration in the range of 1–2% of the funds allocated to the Organisation under the approved project.

PLANNING AND BUDGETING

ARTICLE 31

Planning

The annual programme and work plan of CeMI is adopted by the Governing Board in accordance with Article 28 of the Statute.

Within the adopted annual plan, each Coordinator in the Organisation draws up work plans for their field of work, as determined by the Executive Director or the Collegium.

ARTICLE 32**Budgeting**

The Head of the Finance and Public Relations Department, together with the Financial Manager, prepares the draft annual financial plan and the monthly budgets.

The annual financial plan is adopted by the Governing Board in accordance with Article 28 of the Statute. Within the adopted annual financial plan, the Executive Director approves monthly and project budgets and oversees their implementation, and the President of the GB may adjust them in accordance with Article 48 of the Rulebook on Financial Operations and Procurement.

At the end of the period, the amount remaining in individual budgets and its allocation are determined.

Expenditure in one period does not affect the budget for the following period.

Everyone in the Organisation shall manage the funds allocated to them from the budget in the most economical manner.

The Head of the Finance and Public Relations Department shall draw up the draft financial plan for the coming year and submit it to the Governing Board within the time limit set in Article 3 of the Rulebook on Financial Operations and Procurement.

FINAL PROVISION

ARTICLE 33**Entry into force**

These Rules of Procedure enter into force on the day of their adoption.

Podgorica, 16 January 2018 (updated February 2026)

02

RULEBOOK

RULEBOOK ON EMPLOYMENT AND OTHER TYPES OF WORK ENGAGEMENT



RULEBOOK

Rulebook on Employment and Other Types of Work Engagement

Adopted in December 2012

Pursuant to the provisions of the Statute of the NGO Centre for Monitoring and Research governing the competence of the Governing Board to adopt general acts, the Governing Board of the Centre for Monitoring and Research CeMI hereby adopts the Rulebook on Employment and Other Types of Work Engagement.

PART ONE – GENERAL PROVISIONS

ARTICLE 1

Subject matter

This Rulebook governs the grounds, conditions and procedures for the employment and engagement of staff, experts, interns, volunteers and scholarship holders.

ARTICLE 2

Purpose of this Rulebook

The purpose of this Rulebook is to improve the procedures for recruitment and work engagement at the Centre for Monitoring and Research (hereinafter: CeMI).

PART TWO – JOB POSITIONS AND HUMAN RESOURCE MANAGEMENT

CHAPTER I JOB POSITIONS AND EMPLOYMENT PLANNING

ARTICLE 3

Job positions and classification

Job positions at CeMI (hereinafter: positions) are determined by the Act on Internal Organisation and Systematisation of Job Positions (hereinafter: the Organisational Plan).

The Governing Board determines the systematisation of job positions, and the Assembly adopts the Act on Systematisation of Job Positions, in accordance with Articles 28 and 37 of the Statute.

ARTICLE 4

Employment at CeMI

Employment at CeMI takes place in accordance with the Organisational Plan, the approved budget and this Rulebook, on the initiative of the Executive Director, a Head of Department or other organisational units.

ARTICLE 5**Employment plan**

- (1) The Executive Director shall draw up CeMI's employment plan for each calendar year, in accordance with the Organisational Plan and the annual financial plan adopted by the Governing Board, and shall submit it to the Finance and Public Relations Department. The plan may be adjusted to reflect changes resulting from a decrease or increase in the volume of work or in the number of active projects.
- (2) In accordance with the plan referred to in paragraph (1) of this Article, the Executive Director shall decide on the publication of an internal call or a public call.
- (3) Pursuant to the decision referred to in paragraph (2) of this Article, the Finance and Public Relations Department shall publish the internal call or public call.
- (4) The employment plan may be amended no later than the date on which the call is published.

ARTICLE 6**Method of filling a vacant position**

- (1) A vacant position shall be filled on the basis of professional competence through open competition.
- (2) Before a public call is published, the vacancy shall be advertised by means of an internal call.

ARTICLE 7**Method of assigning persons to project positions**

- (1) Vacant project positions shall be filled from among the available CeMI staff on the basis of professional ability, provided that the persons concerned meet the professional requirements of the position in question.
- (2) Where no one within CeMI is professionally suitable for the open project position, or where the persons with relevant professional references are already engaged on other projects or activities, a public call shall be published.
- (3) The Executive Director shall decide on the selection of persons to be engaged on a project.
- (4) The Executive Director shall decide on the engagement of persons from a partner organisation on a project on the basis of a recommendation from the authorised person of that partner organisation.

CHAPTER II CONDITIONS FOR ESTABLISHING WORK ENGAGEMENT**ARTICLE 8****General and special conditions for employment**

- (1) As general conditions for employment, a candidate shall:
 - a) have the right to work in Montenegro, in accordance with the law;
 - b) be of full age;
 - c) have the health capacity required for the position concerned, where the nature of the work so requires;
 - d) not be the subject of criminal proceedings for criminal offences that would render them unfit to perform the work, where the nature of the position so justifies, in particular for positions with an elevated safeguarding risk (Article 11 of the Safeguarding Policy).
- (2) The special conditions for each position are laid down in the Organisational Plan and may relate to:
 - a) professional qualifications;
 - b) professional work experience;
 - c) knowledge of a foreign language;

- d) computer skills;
- e) a driving licence for a particular category of vehicle;
- f) physical ability to perform the tasks, where the nature of the work so requires;
- g) other conditions, where the nature and conditions of the work so require.

ARTICLE 9

Engagement of experts

- (1) Experts may be engaged for a specific activity within or outside the projects being implemented.
- (2) Experts shall be engaged from the List of Experts unless the rules of a specific project or a signed contract provide otherwise.
- (3) The List of Experts consists of employees and external associates with references in specific fields of expertise.
- (4) The List of Experts is used to engage experts on projects according to project needs. The List contains basic information about each expert, their previous experience and project work, and an evaluation of their work on a scale from 1 to 5, where 5 is the highest and 1 the lowest rating for the quality of the work.
- (5) The Executive Director shall decide on the appointment of experts from the List on the proposal of the Project Manager or the manager responsible for the engagement concerned.
- (6) The Executive Director shall adopt the decision establishing the List of Experts referred to in paragraph (2) of this Article no later than 31 January of the current year.
- (7) The List of Experts may be supplemented during the current year where an expert required for a particular activity cannot be found on it.
- (8) Persons who have received a rating of 2 or 1, as well as persons who have received two consecutive ratings of three, shall be removed from the List of Experts.
- (9) Engaged experts shall be evaluated by the Project Manager or by the coordinator of the activities for which they were engaged.
- (10) Where the Executive Director is engaged as an expert, the decision on the engagement shall be taken by the President of the Governing Board.

ARTICLE 10

Admission of interns

- (1) Interns shall be engaged at CeMI on the basis of the Organisational Plan, the approved budget and this Rulebook, on the initiative of the heads of organisational units and in accordance with the provisions of this Rulebook.

ARTICLE 11

Admission of volunteers

- (1) The number of volunteers who may be admitted during a calendar year shall be determined by a decision of the Executive Director, on the proposal of the heads of organisational units and in accordance with the funds approved in the budget for that calendar year.
- (2) In accordance with the decision referred to in paragraph (1) of this Article, the Finance and Public Relations Department shall publish a public call for the admission of volunteers.
- (3) The public call for the admission of volunteers shall contain:
 - a) a job description;
 - b) the number of persons to be engaged;

- c) the place of and deadline for submitting applications;
- d) the general and special conditions for the admission of volunteers;
- e) any special notes further explaining the selection procedure.
- (4) Candidates interested in being admitted as volunteers shall submit their applications within the prescribed deadline.
- (5) The admission and selection of candidates for volunteer work shall be determined by the Decision on the Engagement of Volunteers.

ARTICLE 11A

Admission of scholarship holders

- (1) The number of scholarship holders who may be admitted during a calendar year shall be determined by a decision of the Executive Director, on the proposal of the heads of organisational units and in accordance with the funds approved in the budget for that calendar year.
- (2) In accordance with the decision referred to in paragraph (1) of this Article, the Finance and Public Relations Department shall publish a public call for the admission of scholarship holders.
- (3) The public call for the admission of scholarship holders shall contain:
 - a) the number of persons to be engaged;
 - b) the place of and deadline for submitting applications;
 - c) the general and special conditions for the admission of scholarship holders;
 - d) any special notes further explaining the selection procedure.
- (4) Candidates interested in being admitted as scholarship holders shall submit their applications within the prescribed deadline.
- (5) The admission and selection of scholarship holders shall be determined by the Decision on the Engagement of Scholarship Holders.

CHAPTER III PROCEDURE FOR FILLING VACANT POSITIONS

ARTICLE 12

Public and internal calls

Employees, interns, volunteers and scholarship holders shall be selected through a public call or an internal call.

In exceptional cases, experts shall be selected through a public call.

The selection criteria shall be set out in the call.

ARTICLE 13

Content and publication of internal and public calls

- (1) A public call published in the media shall contain:
 - a) the name of the organisational unit;
 - b) the title of the position;
 - c) the type of employment;
 - d) the number of persons to be engaged;
 - e) the general and special conditions for employment;
 - f) the place of and deadline for submitting applications;

- g) a note that the job description is available on CeMI's website.
- (2) A public call or internal call published on CeMI's official website shall contain:
 - a) the information referred to in paragraph (1) of this Article;
 - b) the job description.

ARTICLE 14

Committee for the selection of candidates

The Selection Committee (hereinafter: the Committee) consists of the President of the Governing Board, the Executive Director and the Head of the Finance and Public Relations Department.

Where the Executive Director considers it necessary, the Committee may have more than three members.

The Committee shall decide by majority vote.

The Executive Director is the Chair of the Committee.

The decision of the Committee shall state the reasons on which it is based.

ARTICLE 15

Recusal of Committee members

- (1) A member of the Committee shall recuse themselves from the recruitment procedure where the candidate:
 - a) is their spouse or unmarried partner;
 - b) is their blood relative in the direct line;
 - c) is their blood relative up to the third degree;
 - d) is their relative by marriage up to the second degree;
 - e) is their adoptive parent or adopted child;
 - f) is in any other relationship with them that gives rise to a conflict of interest.
- (2) In the case referred to in paragraph (1) of this Article, the Committee member concerned shall submit a request for recusal to the Governing Board.
- (3) In the case referred to in paragraph (1) of this Article, the Governing Board shall decide, on the proposal of the Committee, within three working days of submission of the proposal.
- (4) The decision referred to in paragraph (3) of this Article shall also designate the Committee member who is to replace the recused member.
- (5) This Article lays down special rules for recruitment procedures; in all other respects, conflicts of interest shall be managed in accordance with the Conflict of Interest Policy.

CHAPTER IV PROOF OF GENERAL AND SPECIAL CONDITIONS

ARTICLE 16

Proof of general conditions

To prove that they meet the general conditions, the candidates ranked highest on the ranking list shall, in addition to the information stated in their application to the public call or internal call, submit the following within five days of the date of notification:

- a) proof of the right to work in Montenegro (a certificate of citizenship or a valid work permit), not older than six months;
- b) a medical fitness certificate, where required for the position, not older than three months;

- c) a certificate that no criminal proceedings are pending against them, where required under Article 8 of this Rulebook, not older than three months.

ARTICLE 17

Proof of special conditions

The candidate shall submit evidence that they meet the special conditions referred to in Article 8, paragraph (2) of this Rulebook.

ARTICLE 18

Proof of professional qualifications

- (1) As evidence of the required level of education, that is, of professional qualifications, a candidate may submit:
 - a) a diploma or, for candidates who obtained their diploma under the Bologna process, a diploma supplement, or another document, such as a certificate of any kind, issued by an educational institution in Montenegro;
 - b) an act of recognition (nostrification) of the diploma or of the equivalence of a certificate;
 - c) a diploma or another document, such as a certificate of any kind, which, according to a certificate issued by the competent authority, is not subject to recognition (nostrification) under the regulations of Montenegro.

ARTICLE 19

Submission of additional evidence

- (1) Where the diploma or other document does not provide sufficient evidence of the required professional qualifications, the candidate shall, at the request of the Committee, obtain and submit, within two working days, a certificate from the competent institution proving their professional qualifications.
- (2) Evidence of retraining or additional training for the professional qualifications concerned shall also be accepted as relevant evidence of professional qualifications.

ARTICLE 20

Proof of work experience

- (1) As evidence of the required professional work experience, candidates may submit:
 - a) a certificate or other document certified by the employer on the length of work experience in the profession, together with a certified copy of the employment record book proving the length of service with that employer;
 - b) a certificate issued by the competent pension insurance authority or another state authority that may serve as evidence of work experience;
 - c) a certificate issued by the competent authority on work experience acquired through volunteer work, together with a certified copy of the contract on volunteer work.
- (2) The certificate referred to in paragraph (1) of this Article, except for the certificate referred to in point b) of that paragraph, shall contain information on the type of work, the level of professional qualifications and the period of engagement.
- (3) Where the certificate issued by the competent authority does not provide sufficient evidence of work experience, the candidate may be requested to submit other documents proving work experience in accordance with paragraphs (1) and (2) of this Article.

ARTICLE 21**Proof of meeting special conditions through practical work**

- (1) Candidates shall carry out practical work as evidence that they meet the special conditions referred to in Article 8, paragraph (2) of this Rulebook.
- (2) Candidates shall not be required to carry out practical work where they hold any of the following as proof of knowledge of a foreign language:
 - a) a certificate issued by a faculty (confirming language proficiency or a foreign language examination passed during studies), or other faculty documents (a certified copy of the enrolment form or academic transcript);
 - b) a diploma or another document confirming an acquired title or profession directly related to knowledge of a foreign language, such as foreign language teacher, interpreter, interpreter's assistant and similar;
 - c) a university diploma or a diploma for an academic degree obtained in Montenegro or abroad which clearly confirms that the education concerned was completed partly or entirely in a foreign language.
- (3) Candidates shall not be required to carry out practical work where they hold any of the following as proof of computer skills:
 - a) a certificate issued by a school or another body providing computer training, whether in Montenegro or abroad;
 - b) a certificate issued by a faculty confirming a computer skills test or IT examination passed, or other faculty documents confirming computer skills, such as a certified copy of the enrolment form or academic transcript;
 - c) a diploma or another document confirming an acquired title or occupation directly related to computer work;
 - d) an ECDL (European Computer Driving Licence) certificate.

PART THREE – FINAL PROVISIONS

ARTICLE 22**Entry into force**

This Rulebook enters into force on the day of its adoption.

Podgorica, 23 December 2012

03

RULEBOOK

RULEBOOK ON FINANCIAL OPERATIONS AND PROCUREMENT



RULEBOOK

Rulebook on Financial Operations and Procurement

Adopted in January 2015, updated February 2026

Pursuant to the provisions of the Statute of the NGO Centre for Monitoring and Research concerning the competence of the Governing Board to adopt general acts, and in accordance with the Law on Non-Governmental Organisations, the Governing Board hereby adopts the Rulebook on Financial Operations and Procurement.

GENERAL PROVISIONS

ARTICLE 1

Subject

The Rulebook on Financial Operations and Procurement (hereinafter: the Rulebook) governs the financial operations of the Centre for Monitoring and Research (hereinafter: CeMI), in particular:

1. the earning, acquisition and planning of funds;
2. the financing of operations;
3. payments and the maintenance of solvency;
4. the formation of reserves;
5. the responsibility of authorised employees for CeMI's financial operations;
6. the conduct of procurement.

ARTICLE 2

Financial stability

CeMI's financial operations shall secure long-term stability so that CeMI fulfils its obligations on time.

ARTICLE 3

Financial plan

The basic framework for CeMI's financial operations is set by the annual financial plan, adopted by the Governing Board in accordance with Article 28 of the Statute, and by the cash flow plan based on the annual work plan and CeMI's other plans; these are drawn up at the end of the year for the following year and no later than the beginning of the year for the current year.

ACCOUNTING SOFTWARE

ARTICLE 4

Accounting records and software

The Governing Board decides on the keeping of accounting records, including the engagement of an external accountant or accounting service provider (hereinafter: the Accountant), in accordance with Article 28 of the Statute.

CeMI maintains its accounting information, that is, its accounting and bookkeeping, by means of accounting software.

The software referred to in paragraph 2 of this Article shall be developed, distributed and maintained by an authorised financial or software company.

The books of account shall be kept using the double-entry bookkeeping system.

The books of account referred to in paragraph 4 of this Article comprise the journal, the general ledger and the subsidiary records, in accordance with the law governing accounting and other applicable laws of Montenegro.

ARTICLE 5

Accuracy of bookkeeping and access to the system

Accounting and bookkeeping shall be carried out in compliance with the principles of timely and accurate data entry, with the aim of giving a true picture of CeMI's actual financial position and liquidity.

Access to the accounting system shall be limited to the relevant users designated by the Executive Director and shall be protected by an access code in order to preserve the integrity of the data.

ARTICLE 6

Software maintenance and access levels

The authorised financial or software company is responsible for the correct installation and continued operation of the software referred to in Article 4 of this Rulebook.

The security system is configured to allow different levels of access. The Executive Director, the Head of the Finance and Public Relations Department and the Financial Manager have full access to the entire system.

Bookkeeping and accounting are entrusted to the Accountant and the Financial Manager, who shall perform them in accordance with the strict, predefined rules applicable to the accounting method in use.

STORAGE OF FINANCIAL DATA (BACKUP)

ARTICLE 7

Backup of financial data

CeMI shall back up its financial data on a daily and weekly basis to ensure that the data remain secure and are not lost in the event of a system failure or computer malfunction.

ARTICLE 8

Access to accounting data and cloud backup

The following responsible persons hold the access credentials for the computer on which the accounting software and the accounting database are installed:

- 1) the Accountant/Bookkeeper;
- 2) the Financial Manager; and
- 3) the Head of the Finance and Public Relations Department. Financial data shall be backed up, as provided in Article 7, through the cloud system.

Access to the backup data referred to in Article 7 and paragraph 2 of this Article is protected by two-factor authentication: a user password and an SMS verification code.

In the event of partial or permanent physical destruction of the hardware, the cloud system allows the data to be recovered up to the time of the last synchronisation.

INCOMING FUNDS

ARTICLE 9

Sources and receipt of funds

The policies and procedures for incoming funds ensure that all incoming funds are correctly recorded, protected through the segregation of duties and supported by appropriate documentation.

The purpose of the activities referred to in paragraph 1 of this Article is to limit, wherever possible, the transfer and handing over of cash by giving priority to electronic banking transactions or transfers.

All funds in excess of EUR 1000 shall be received through the bank.

Cash may be accepted to cover limited use of CeMI's resources, such as printing, copying, use of a car, participation, or other minor costs.

All payments that donors or project partners are to make under a contract shall be transferred directly to CeMI's bank account.

In the case of institutional donations for the implementation of project activities, funds are received in the manner and according to the schedule laid down in the signed contract.

In accordance with the Law on Non-Governmental Organisations and Article 39 of the Statute, CeMI acquires assets from:

- 1) membership fees;
- 2) voluntary contributions;
- 3) gifts;
- 4) donations;
- 5) legacies;
- 6) interest on deposits;
- 7) dividends;
- 8) rent;
- 9) income from economic activities; and
- 10) any other source not contrary to law.

For each grant, contract, loan or other agreement, the Executive Director shall designate the responsible employees.

The procedures shall ensure that all requests for funds are properly filed and followed up.

ARTICLE 10

Cash receipts, invoicing and receivables

Cash received under Article 9 of this Rulebook shall be reported and recorded in the accounts for the month in which it was received.

The document referred to in paragraph 1 of this Article shall be signed by both parties, the party paying the cash receiving one copy and CeMI retaining the other.

The supporting documentation (letters, vouchers, receipts and similar) shall accompany the cash when it is delivered to the employees designated for processing and depositing it.

All collected funds awaiting deposit with the bank shall be kept in a locked cash box accessible only to the employees designated by the Financial Manager.

The Financial Manager shall report the cash together with the documentation received and prepare the deposit for delivery to the bank. The employees designated for that purpose shall take the deposits to the bank.

The Accountant shall enter the deposit in the accounting system.

On the following day, or when the next bank statement containing the deposit is issued for the relevant account, a bank reconciliation shall be performed to confirm that the amount deposited matches the amount shown in the bank statement.

For services provided by CeMI, at the request of the Executive Director and on the basis of an agreement signed by the Executive Director under authorisation from the President of the Governing Board (Articles 30 and 34 of the Statute), the Head of the Finance and Public Relations Department shall approve the invoices processed by the Financial Manager.

CeMI shall issue two original copies of each invoice, one for its own archive and one for the other party. Before the archiving referred to in the preceding sentence, the second copy of the invoice shall be signed by its recipient.

A scanned copy or photocopy of the invoice shall be sent to accounting.

CeMI shall review the status of all receivables every Wednesday.

The procedure for receivables referred to in the preceding paragraph is the same in respect of natural persons, except that no invoice is issued and all activities are based on the terms set out in the agreement.

Overdue receivables shall be reviewed by the Financial Manager.

The write-off of uncollectible receivables shall be authorised by the Executive Director and duly documented.

The Head of the Finance and Public Relations Department shall review receivables from customers quarterly to ensure that there is a reasonable expectation of their collection.

OUTGOING FUNDS

ARTICLE 11

Approval and execution of payments

The policies and procedures for disbursements are designed to ensure that payments are made properly, on the basis of appropriate documentation and authorisation.

Every payment of funds shall be approved by two persons.

Each payment requires the authorisation of the Executive Director or the President of the Governing Board. The Executive Director authorises payments on the basis of a standing written order of the President of the Governing Board, in accordance with Article 34 of the Statute.

Heads of Department and Project Managers approve costs within their respective areas of responsibility.

Payments of amounts up to EUR 100 may be made in cash as well as through the bank. The purpose of such cash payments is to facilitate purchases from small businesses and refunds required in CeMI's day-to-day operations without the need to complete bank payment requests. The cash limit is determined by the Executive Director.

Cash shall be kept in a locked box secured in a locked archive room, in a safe or in a locked desk. Only the Financial Manager holds the key to the safe.

Bank payments are made by e-banking or manually, by completing and signing payment requests in the form prescribed by the bank. E-banking enables the electronic transfer of money, and account balance statements are obtained by computer or telephone.

Payments are prepared by the Office Manager or the Financial Manager, and the correctness of the payment and the availability of funds are checked by the Financial Manager or the Head of the Finance and Public Relations Department.

Payments shall always be executed by the Financial Manager.

Each payment shall be approved by the Executive Director or the President of the Governing Board.

ARTICLE 12

Payment requests

Payment requests shall be submitted together with the original invoice or contract.

The request shall be signed by the authorised employees (Heads of Department, Project Managers and the Executive Director), who may state the original need for the expenditure.

Requests for payment and invoices are processed by the Financial Manager. On the basis of the requirements referred to in the preceding paragraph, the Financial Manager may determine, and accordingly enter, the correct source of funding or account.

ARTICLE 13

Lost invoices

Where an invoice for services or goods has been lost, a detailed explanation of the cost shall be submitted together with the payment request for approval by the Head of the Finance and Public Relations Department.

The supplier shall be contacted as soon as possible with a request for a second original (certified copy) of the invoice in question.

ARTICLE 14

Cash payments and petty cash

The cash payment receipt shall be completed in two copies.

The original shall be given to the person to whom the amount concerned was paid.

The second copy shall be sent, together with the supporting documents, to the Office Manager for data entry and processing.

The person making a cash payment and the person approving it shall be different persons.

Payments for miscellaneous expenses of up to EUR 100 may be made in cash.

Where funds are required for a purchase, the purchaser shall provide a receipt for the amount received. Funds may be advanced before the purchase or paid after it. In the case of an advance, the purchaser shall submit a receipt together with the purchase request approved by their supervisor and return any remaining balance.

Where a receipt has been lost, the Head of the Finance and Public Relations Department or another authorised person may, in accordance with Article 11 of this Rulebook, approve payment on the basis of a report describing the item and its cost. The person responsible for these activities shall ensure that the petty cash fund and income are properly recorded.

Any irregularities in the petty cash fund shall be reported immediately to the Head of the Finance and Public Relations Department.

Requests for replenishment of the fund shall be completed by the Office Manager and approved by the Project Manager and the Executive Director.

The availability of funds shall be confirmed by the Head of the Finance and Public Relations Department.

Bank orders for small cash amounts are prepared and signed by two persons authorised to approve them (who also approve the Request for Money Exchange) and handed to the person whose specimen signature and personal data are registered with the bank and who is responsible for withdrawing the cash from the bank.

The cash shall be recorded immediately after the authorised person returns from the bank.

The transaction shall be recorded in the financial documentation and in the accounts under the date on which it was made.

The Executive Director shall periodically carry out unannounced cash checks.

ARTICLE 15

Bank orders

The Financial Manager shall review Requests for payment by checking the account, the eligibility of the expenditure and the authorised signatures.

The request referred to in paragraph 1 of this Article shall be checked against the delivery (for payments to legal entities) or against the contract (for payments to natural persons).

The bank order shall be completed by the Financial Manager. The Head of the Finance and Public Relations Department shall sign the Request to confirm the availability of funds and the correctness of the code used.

The bank order shall be submitted to an authorised person for signature.

The bank order shall be sent to the bank, and the original retained for processing and archiving. A copy shall be returned to the office and attached to the Request.

Where e-banking is available, the entire procedure shall be carried out electronically.

Depending on the capabilities of the system in use, the Financial Manager prepares the bank transfer in the system, confirms its accuracy and the availability of funds, and requests consent for final approval. The completed bank order is printed from the system and attached to the supporting documents.

The documents follow the approval path from the initiator onwards, so that the documentation supporting the transaction is available for review at each stage of the process. Where the system so permits, the documents shall be scanned at the beginning of the procedure and attached electronically to the bank order.

PAYROLL

ARTICLE 16

Payroll principles

These procedures are designed to ensure that wages are based on proper authorisation and the required documentation, that they are paid at the approved rate and only to employees, and that these activities are reported properly, accurately and on time to the state and local tax authorities.

Wages are calculated using data from employees' timesheets, which are completed and signed by the employee and then reviewed, approved and signed by an authorised person (the supervisor).

The timesheet referred to in the preceding paragraph shall contain a detailed record of the exact number of hours or days worked, days off and any paid or unpaid leave, reflecting actual engagement in the month or period concerned.

ARTICLE 17

Payroll procedure

Payroll shall be processed monthly. Wages for the previous month shall be paid between the 1st and the 10th of the month. At the employee's request, part of the wage may be paid as an advance in the middle of the month (Article 28 of the Rules of Procedure). Wages are based on timesheets or reports completed by employees and approved by their supervisor. Each timesheet shall show the source of funding from which the employee's time is paid.

Timesheets shall show the use of days off, annual leave or other absences, where applicable. Timesheets shall be signed in ink, and correction fluid or correction tape shall not be used to alter the data. Changes shall be initialled by the staff member. After each change made following the initial signature, the timesheet shall be signed by both the staff member and their direct supervisor.

New engagements and changes to salaries or other fees shall be approved by the Executive Director. The employee action forms approving employees' wages are proposed by the Head of the Finance and Public Relations Department, signed by the Executive Director and returned to the finance office for processing.

Payroll records shall be kept by the Head of the Finance and Public Relations Department in strict confidence. Information on individual wages is accessible only to the persons who process payroll, who shall not disclose it to other staff members, without prejudice to employees' rights under labour and anti-discrimination legislation. Files shall be kept in locked cabinets to which only designated staff have access.

Documents evidencing the withholding of taxes and other deductions, such as health insurance premiums or voluntary contributions, are kept in the payroll files by the Head of the Finance and Public Relations Department. A separate file containing all forms required by the Employment Agency for each current employee is maintained by the Head of the Finance and Public Relations Department.

The Head of the Finance and Public Relations Department shall check each timesheet for calculation errors.

Once the payroll has been approved by the Executive Director, the Head of the Finance and Public Relations Department shall verify that the wages are correct and complete by checking them against the filed data.

The Head of the Finance and Public Relations Department shall check the transfer of funds against the submitted payroll data.

Under the gross wage system, the full amount of the gross wage is paid in a single operation. This automated system simultaneously distributes net wages, wage tax and contributions to the respective accounts. As soon as the bank statement is available, the Head of the Finance and Public Relations Department shall inspect it to verify the accuracy of the payments.

Fees for work are paid through CeMI's administrative account and are approved by the Executive Director and the Head of the Finance and Public Relations Department.

FEES FOR TEMPORARY AND PERIODIC ENGAGEMENT OF EXTERNAL STAFF

ARTICLE 18

Purpose of fees for external staff

These activities are carried out to ensure that payments of entitlements under signed service contracts are justified and supported by appropriate authorisation and the necessary documentation, that funds are paid at the approved rate, and that the state and local tax authorities are informed accurately and on time.

ARTICLE 19**Payment of fees for external staff**

The procedure for approving payment is the same as that for the payment of wages (fees for work). The amount and date of payment are specified in the contract. Approval is given by the immediate supervisor, that is, a person authorised on behalf of CeMI, or by the Project Manager. Personal income tax and contributions are paid by CeMI.

PROCUREMENT**ARTICLE 20****Procurement principles**

Procurement is a process that shall be conducted so as to ensure an adequate level of competition and a market-based approach when purchasing goods and services for the implementation of programme activities and the achievement of project results, or for necessary administrative purposes.

The activity referred to in paragraph 1 of this Article is based on five principles: accountability, transparency, proportionality, equal treatment and non-discrimination, and value for money.

ARTICLE 21**Procurement thresholds**

The following thresholds are established according to the value of the goods or services being procured. Where procurement is carried out for the purposes of a project, the procurement rules of the donor concerned shall also be taken into account, and the stricter rules shall apply.

1. EUR 0–100: cash;
2. EUR 101–1 000: single quotation;
3. EUR 1 001–10 000: simple offer;
4. EUR 10 001–100 000: formal offer;
5. EUR 100 001–500 000: national public tender;
6. EUR 500 001 and above: international tender.

ARTICLE 22**Procurement procedures**

The terms used in Article 21 have the following meanings:

1. Cash: goods or services relating mainly to minor office supplies, small IT equipment, equipment maintenance and similar. The procedure is conducted in accordance with the cash payment procedure, by joint decision of the designated manager and the Financial Manager.
2. Single quotation: goods or services that can be obtained on the basis of a single bid without a tender procedure. The decision is taken directly by the Executive Director.
3. Simple offer: online or other research shall be conducted to obtain prices from at least 3 different sources. Formal offers are not required.
4. Formal offer: at least 3 selected suppliers shall be formally invited in order to obtain at least 3 formal bids. All communication shall be recorded and dated.
5. National public tender: a procedure conducted in full compliance with the national rules on public tenders.

6. International tender: a procedure conducted in full compliance with the international rules on public tenders.

ARTICLE 23

Electronic payment cards

To facilitate payments relating mainly to official travel and online purchases, the use of an electronic payment card is permitted. Depending on the agreement with the bank, the use of a credit or debit card may be considered.

A separate bank account shall be opened for this purpose. Funds may be used only through this account.

The advantages and disadvantages of each type of card shall be carefully examined and compared to ensure an adequate level of safeguarding and management of funds. The bank shall provide detailed information on all relevant particulars in order to mitigate possible risks. Debit card: the use of funds is limited to the amount available in the account. The account balance is monitored directly by the Executive Director or the Head of the Finance and Public Relations Department, or both, by means of an SMS notification of each executed transaction or a bank statement for each transaction.

Credit card: the credit limit is determined in agreement with the bank. There is a risk that interest will be charged on funds used within the credit limit.

The Executive Director decides on the ownership and custody of cards.

ARTICLE 24

E-card account and use

A separate bank account shall be opened for use exclusively for e-card transactions. The Executive Director decides on the maximum balance. When the card is not in use, the account balance shall be 0 (zero), or close to zero where funds are needed to cover the monthly account maintenance fees.

Depending on need and availability, more than one card may be obtained for this account. The Executive Director decides on the protection of the account. Cards shall be kept locked in the safe held by the Financial Manager.

In order to use an e-card, an employee shall obtain written permission or authorisation, or a decision of the Executive Director or the President of the Governing Board, to use a debit card for business purposes related to this bank account. These documents shall be archived so that clear information on who used the card or cards, and during which period, is available at all times. The Executive Director shall change the access codes and share them only with authorised users.

If an e-card is stolen or lost, the designated person shall immediately notify the bank in order to block transactions.

The person responsible for the card shall submit a brief report explaining the circumstances in which the loss or theft occurred.

DAILY BREAKS AND ANNUAL LEAVE

ARTICLE 25

Breaks and leave

In accordance with the Labour Law and CeMI's plan, each employee is entitled to a 30-minute daily break, paid annual leave, sick leave and maternity or parental leave. Specific rights and obligations are set out in the Human Resources Policy.

Unpaid leave requires the express approval of the Executive Director. Paid and unpaid leave are granted in the cases and for the periods provided for by the Labour Law, the applicable collective agreement and the employment contract.

Part-time employees have the rights provided for by the Labour Law, including the right to paid annual leave. Persons engaged under service contracts, author's contracts or other contracts that are not employment contracts are not entitled to paid leave unless the contract provides otherwise.

ARTICLE 26

Daily and weekly rest, holidays and leave

Full-time employees are entitled to a 30-minute daily rest period, which may not be taken at the beginning or end of working hours. Employees are entitled to a weekly rest period of at least 24 consecutive hours. Employees are entitled to paid leave on public and religious holidays.

In accordance with the Labour Law, the Executive Director issues the Decision on Annual Leave and the Decision on Non-working Days during Public and Religious Holidays.

Unpaid leave is granted with the approval of the Executive Director in accordance with the Labour Law, the applicable collective agreement and the employment contract.

Paid leave, that is, absence from work with wage compensation in the cases provided for by law (marriage, childbirth, serious illness or death of a close family member, taking a professional examination and other cases provided for by the collective agreement and the employment contract), is granted in accordance with the Labour Law.

RETIREMENT

ARTICLE 27

Pension contributions

The employer is required by law to pay pension fund contributions for every employee who has an employment contract.

RENTING EMPLOYEES' PRIVATE PROPERTY

ARTICLE 28

Renting employees' private property

Where additional equipment is required for temporary use because CeMI's available non-financial assets are insufficient for the successful implementation of an activity, CeMI may request some of its employees to lease their private movable or immovable property to it for appropriate compensation acceptable to both parties.

ARTICLE 29

Assessment of needs and compensation

Needs for additional non-financial resources are assessed by the Executive Director, the Head of the Finance and Public Relations Department and the Head of Department.

The amount of compensation shall be established on the basis of the type of equipment, expected use and maintenance costs. The decision shall be realistic and justified, and the rent shall be economically advantageous for CeMI and consistent with previous comparable rental costs.

The amount of compensation shall be determined on the basis of the current market value.

The rental terms shall be set out precisely in a rental contract signed by both parties.

RENTING OUT CEMI'S PROPERTY

ARTICLE 30

Renting out CeMI's assets

This procedure governs the renting out of CeMI's assets (fixed assets and inventory).

Owing to their differing characteristics, cases shall be dealt with individually according to the type of property being leased.

The Governing Board manages CeMI's assets in accordance with Article 28 of the Statute. The Executive Director approves the leasing of CeMI's assets on the basis of, and within the limits set by, a decision of the Governing Board. Leases outside those limits are decided on by the Governing Board.

Before approval is given, the parties who may be affected by the lease shall be consulted in order to reduce the risks relating to:

- CeMI's profit;
- reduced functionality due to non-use;
- comparative financial analysis of maintenance costs;
- depreciation; and
- maintaining good cooperation with other parties.

ARTICLE 31

Rental contract

Both parties shall sign a contract setting out the particulars and condition of the equipment and all relevant rental terms.

In all cases, legal ownership of the property remains with CeMI.

Every contract shall contain a clause stating that CeMI's Governing Board may terminate the contract if it considers it detrimental to CeMI's financial interests or public relations.

DONATIONS AND CONTRACTS

ARTICLE 32

Review of contracts and donations

Documents relating to contracts and donations shall be reviewed and approved by the Head of Department and by the Head of the Finance and Public Relations Department before being submitted to the Executive Director.

ARTICLE 33

Signing and management of donation contracts

The Executive Director signs donation contracts under authorisation from the President of the Governing Board, as the person authorised to represent CeMI (Articles 30 and 34 of the Statute).

The Head of Department shall carefully review each donation contract to ensure that all its elements are consistent with the approved project.

The Head of the Finance and Public Relations Department and the Financial Manager shall review in detail the financial terms of the contract and any donation funds received to ensure that CeMI complies with all financial provisions.

The original donation agreement shall be kept in the archive held by the Financial Manager. A scanned copy shall be placed in a document database designed to facilitate the use and availability of documents.

The Financial Manager, in consultation with the Accountant, assigns the appropriate general ledger account number.

The Executive Director allocates responsibilities among employees on the basis of an approved project, that is, donation.

The Head of Department shall collect and archive individual files containing a copy of the grant agreement, any amendments, relevant correspondence relating to the donation and documentation relating to the implementation of project activities.

The Financial Manager prepares financial reports, makes payments under the project, and archives all budget changes and relevant financial correspondence.

BUDGETS

ARTICLE 34

Purpose of budgets

Budgets provide a standard against which performance is measured, encourage planning and allocate funds in accordance with the requirements of the funding source. Budgets shall be based on reasonable revenue and expenditure assumptions. All budget analyses shall be documented to facilitate further analysis and evaluation not only of the budget but also of current project-level revenue and expenditure.

ARTICLE 35

Preparation and approval of budgets

Project budgets are prepared by the Financial Manager and submitted to the Executive Director for review and approval within the framework of the annual financial plan.

CeMI's draft annual financial plan is prepared by the Financial Manager and the Head of the Finance and Public Relations Department and adopted by the Governing Board in accordance with Article 28 of the Statute.

The draft annual financial report is submitted to the Assembly by the President of the Governing Board, as the person authorised to represent CeMI, in accordance with Article 30 of the Statute. The Executive Director shall ensure that it is prepared in good time.

REPORTING

ARTICLE 36

Types of reporting

Reports assist the Executive Director and donors in controlling project activities and financial resources. In accordance with CeMI's Statute and the law, the following procedures apply in financial matters:

- reporting to donors;
- reporting to CeMI's bodies; and
- reporting to management.

ARTICLE 37**Financial reports**

All reports shall be prepared in good time and contain accurate and up-to-date information so as to provide a sound basis for decision-making and asset management.

Reports are prepared by the Financial Manager and the Head of the Finance and Public Relations Department, in consultation with the Head of Department, and only then submitted to the Executive Director for approval.

Before approving a financial report, the Executive Director shall compare it with the narrative report, and the two shall be consistent.

Reports to donors are submitted by the Head of Department or the Head of the Finance and Public Relations Department in the prescribed reporting format, which is usually determined by the donor.

Depending on the pace of project implementation, and in order to provide timely financial analyses, a report on project costs shall be prepared at least every two weeks. A meeting of the Collegium is held once a month, at which the Executive Director is informed of all financial aspects of project implementation.

Monthly financial reports, including the income and expenditure statement and, where required, the balance sheet, are provided to the Executive Director. The Head of the Finance and Public Relations Department shall prepare monthly and quarterly reports at the donor's request.

A cash expenditure statement shall be prepared twice for each financial year: a half-yearly statement by 15 July covering the period from 1 January to 30 June, and an annual statement by 20 January covering the period from 1 January to 31 December of the previous year.

The Executive Director and the Head of the Finance and Public Relations Department sign all donor reports. The Financial Manager prepares and updates the list of donor reports and deadlines and is responsible for ensuring that all financial reports are submitted on time.

A semi-annual report setting out expected revenue and expenditure and reflecting CeMI's financial position shall be prepared and submitted at the request of the Executive Director. The annual financial report is submitted to the competent bodies on request and in accordance with the law.

AUDIT**ARTICLE 38****External audit and internal review**

The external audit of CeMI's annual financial statements is carried out by an auditor engaged pursuant to a decision of the Governing Board in accordance with Article 28 of the Statute.

An internal financial review is carried out every year by the Head of the Finance and Public Relations Department, and its findings are reported to the Executive Director and the Governing Board.

In addition, depending on the terms of the grant agreement, project financial audits and expenditure verifications are carried out at the donor's request by an auditor engaged or approved by the donor.

ARTICLE 39**Preparation of audits**

The Financial Manager is the key person responsible for preparing the audit.

Immediately upon receipt of the audit notification letter or email, the Head of the Finance and Public Relations Department shall organise a meeting with the Executive Director, the Head of Department and the Project Managers and draw up a plan for preparing the audit. The Head of the Finance and Public Relations

Department, together with the Financial Manager, is responsible for communicating with the auditors, and all relevant parties shall be informed of the content of each communication.

RETENTION AND DESTRUCTION OF DOCUMENTS

ARTICLE 40

Document retention policy

The policy on the retention and destruction of documents sets out the obligations and responsibilities for maintaining and retaining CeMI's documentation and for destroying its documents.

This responsibility applies to every person who handles CeMI's documents, irrespective of their format (paper or electronic).

Retention periods are determined in accordance with the regulations governing accounting and financial reporting by non-profit organisations, tax regulations, labour regulations, the regulations on archival activity and donor requirements. Where these provide for different periods, the longest period applies.

Strict rules shall be observed in all cases in order to avoid any discrepancies.

ARTICLE 41

Retention periods

CeMI shall retain documents for the following periods:

Type of document	Retention period
Financial statements (balance sheet, income statement and similar)	Permanently
Journal and general ledger	10 years
Accounting documents (vouchers) on which entries are based	7 years
Annual payroll calculations and payment lists	Permanently
Founding documents of the organisation	Permanently
Audit reports	Permanently
Bank certificate of annual turnover	5 years
Bank statements	7 years
Donation contracts	7 years
Employment contracts	Permanently
Contracts for temporary and occasional work	7 years
Loan and lease contracts	7 years
Register of incoming and outgoing invoices	7 years
Opinions of the Tax Administration, the Labour Inspection and other relevant institutions	3 years
Employee personnel files	Permanently

Type of document	Retention period
Pension and retirement records	Permanently
Rules on quality	5 years
Strategic plans	3 years
Quality policy	5 years
SWOT and PESTEL analyses	5 years
List of the organisation's fixed assets	5 years
Incoming and outgoing mail register	5 years

TRAVEL EXPENSES – DAILY ALLOWANCES, ACCOMMODATION AND MEALS

ARTICLE 42

Travel allowances

Travel expenses such as daily allowances, accommodation and meals are reimbursed in accordance with the rules governing the reimbursement of expenses of public sector employees.

Travel expenses shall be reimbursed to employees under other rules where the grant agreement so provides. The legislation in force in Montenegro takes precedence over grant agreements.

ARTICLE 43

Travel expense claims

Employees' expenses are reimbursed in accordance with the rules governing the reimbursement of expenses of public sector employees.

Within 3 days of returning from travel, the employee shall submit the official travel order with the travel expenses calculated, accompanied by the relevant proof of costs (accommodation receipt, transport ticket, local transport).

TRAVEL EXPENSES – MEANS OF TRANSPORT

ARTICLE 44

Means of transport

Employees' travel expenses are covered by CeMI, and travel may be by CeMI's vehicle or by other means of public transport.

Where CeMI's vehicle cannot serve the purpose, a privately owned vehicle is used for the travel.

Where a privately owned vehicle is used, expenses are reimbursed at a rate of 25% of the current fuel price per kilometre, including depreciation.

ARTICLE 45**Travel of employees**

If an employee travels in CeMI's vehicle, the fuel, the travel order and the authorisation to drive the vehicle are provided by the Finance and Public Relations Department with the approval of the Executive Director. Where travel in CeMI's vehicle or in a vehicle owned by an employee is for the purposes of a project of the Delegation of the European Union, the Finance and Public Relations Department shall issue a travel order and provide reimbursement at 25% of the current fuel price per kilometre, including depreciation. The distance is expressed in kilometres and calculated on the basis of the shortest route on www.viamichelin.com. A printout of the online mileage calculation shall be attached to the travel order.

The Financial Manager pays travel advances in cash, and the Executive Director approves the payment.

ARTICLE 46**Travel of interns, occasionally engaged associates and volunteers**

Travel expenses of interns, occasionally engaged associates and volunteers are reimbursed in cash on the basis of the actual costs incurred, upon presentation of the travel ticket.

Where CeMI participates in the Erasmus+ programme, air, rail or bus tickets are paid through the bank account, and the partner organisation makes the refund to the foreign currency account. Details concerning payments and refunds are set out in the Erasmus+ Programme Guide.

ARTICLE 47**Travel of participants in events organised by CeMI**

Travel expenses are reimbursed on the basis of actual costs and the receipts submitted for the distance travelled. If an agency handles the reimbursement of travel expenses on CeMI's behalf, it shall submit an invoice together with a list of the individual expenses paid.

Where the donation contract provides for a different method of reimbursing travel expenses, reimbursement shall be made in the manner set out in that contract.

TRANSITIONAL AND FINAL PROVISIONS**ARTICLE 48****Authorisations of the President**

The authorisations conferred on the Executive Director by this Rulebook are also held by the President of the Governing Board, as the person authorised to represent CeMI (Article 30 of the Statute).

ARTICLE 49**Interpretation**

This Rulebook shall be interpreted by the Governing Board of CeMI.

ARTICLE 50**Amendments**

Amendments and supplements to this Rulebook shall be made in accordance with the procedure and in the manner prescribed for its adoption.

ARTICLE 51**Entry into force**

This Rulebook shall enter into force on the day of its adoption.

Podgorica, 2015 (**updated February 2026**)

04

POLICY

SAFEGUARDING POLICY



POLICY

Safeguarding Policy

Protection of staff, volunteers, election observers, programme participants, children and adults at risk from harm, abuse, exploitation, bullying and harassment

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI staff, Governing Board and Assembly members, volunteers, interns, scholarship holders, experts, consultants, election observers, partners and sub-grantees, in Montenegro
Review	Annually, and after any serious safeguarding incident or change in law or donor requirements

Pursuant to Article 28, paragraph 1, indent 12 of the Statute of the NGO Centre for Monitoring and Research – CeMI, the Governing Board of CeMI hereby adopts the following policies: the Safeguarding Policy; the Code of Conduct; the Whistleblowing Policy; the Complaints, Investigation and Disciplinary Procedure; the Anti-Fraud, Anti-Bribery and Anti-Corruption Policy; the Counter-Terrorist Financing, Anti-Money Laundering and Sanctions Compliance Policy; the Conflict of Interest Policy; the Risk Management Policy; the Partner Due Diligence and Downstream Partner Management Policy; the Data Protection and Information Security Policy; and the Human Resources Policy.

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Subject and purpose

This Policy sets out CeMI's commitment, standards, roles and procedures for preventing and responding to harm to any person who comes into contact with CeMI's work.

The purpose of this Policy is to ensure that:

1. no person is harmed, abused, exploited, bullied or harassed as a result of contact with CeMI, its personnel, its partners or its programmes;
2. everyone knows how to raise a concern, and concerns are handled promptly, confidentially and fairly, in a survivor-centred manner;
3. safeguarding risks are identified, assessed and mitigated in every project, including large-scale deployments of election observers;
4. CeMI meets the safeguarding standards of its donors.

ARTICLE 2

Zero-tolerance statement

CeMI has zero tolerance of:

- sexual exploitation, sexual abuse and sexual harassment (SEAH);
- bullying, harassment (including harassment at work, i.e. mobbing), intimidation and discrimination;
- abuse or neglect of children and adults at risk;
- trafficking in human beings and modern slavery;

- retaliation against any person who raises a concern or cooperates with an investigation;
- inaction, that is, failure to report or act on a safeguarding concern.

Zero tolerance means that every concern is taken seriously and acted upon, and that any person found to have breached this Policy faces disciplinary or contractual consequences, up to and including dismissal or termination of contract, and referral to the competent authorities where the conduct may constitute a criminal offence. It does not mean that every allegation is presumed to be true.

ARTICLE 3

Scope

This Policy applies to all persons listed in the "Applies to" field of the document control table (hereinafter: CeMI personnel and associated persons) at all times – during and outside working hours, at the workplace, in the field, during travel, online and on social media – whenever their conduct is connected with CeMI or could affect the people with whom CeMI works.

All contracts, partnership agreements and sub-grant agreements concluded by CeMI shall contain a safeguarding clause requiring compliance with this Policy or with equivalent standards, and the reporting of safeguarding concerns to CeMI.

ARTICLE 4

Definitions

For the purposes of this Policy:

1. Safeguarding means preventing and responding to harm, abuse, exploitation, bullying and harassment of any person caused by CeMI personnel, associated persons or programmes.
2. Child means any person under 18 years of age, regardless of the age of majority or consent in the country concerned.
3. Adult at risk means a person aged 18 or over who, by reason of disability, illness, age, displacement, poverty, dependency or other circumstances, may be unable to protect themselves from harm or exploitation.
4. Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another person.
5. Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
6. Sexual harassment means any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation, including verbal, non-verbal, physical and online conduct.
7. Bullying and harassment means repeated behaviour, or a single serious incident, including harassment at work within the meaning of the law, that intimidates, degrades, humiliates or offends a person, including on the grounds of sex, gender, ethnicity, religion, disability, sexual orientation, political opinion or any other personal characteristic.
8. Survivor means a person who has experienced, or is alleged to have experienced, harm covered by this Policy. The term "victim" is used where the law so requires.
9. Subject of concern means a person against whom a concern or allegation has been raised.
10. Safeguarding concern means any information, suspicion, allegation or disclosure that a person has been, is being or may be harmed in breach of this Policy.

CHAPTER II – PRINCIPLES AND COMMITMENTS

ARTICLE 5

Guiding principles

CeMI applies the following principles:

1. Do no harm – programmes are designed and delivered so as not to expose people to additional risk.
2. Survivor-centred approach – the rights, safety, needs and wishes of the survivor guide every decision; survivors are informed and consulted, and their consent is sought before any action affecting them is taken, save where there is a risk to life or a legal obligation to report.
3. Best interests of the child – the welfare of the child is the paramount consideration in all decisions affecting children.
4. Confidentiality – information is shared strictly on a need-to-know basis, in accordance with the Data Protection and Information Security Policy.
5. Fairness and due process – subjects of concern are presumed innocent, are informed of the allegation at the appropriate stage and are given a fair opportunity to respond.
6. Non-retaliation – no person suffers any detriment for raising a concern in good faith.
7. Accountability and transparency – CeMI reports safeguarding cases to its Governing Board and donors and learns from every case.
8. Equality and non-discrimination – the Policy applies equally to everyone, regardless of position or seniority.

ARTICLE 6

Organisational commitments

CeMI undertakes to:

1. appoint a Board Safeguarding Lead and a Safeguarding Focal Point with a deputy, and publish their contact details;
2. apply safer recruitment practices to every role;
3. require every person covered by this Policy to sign the Code of Conduct before starting work;
4. provide mandatory safeguarding induction and annual refresher training;
5. maintain safe, accessible and confidential reporting channels, including anonymous channels, for staff, observers, partners and members of the public;
6. keep a confidential Safeguarding Case Register;
7. assess and support the safeguarding capacity of partners (Partner Due Diligence and Downstream Partner Management Policy);
8. report safeguarding cases to donors;
9. review this Policy annually and report to the Governing Board on its implementation.

CHAPTER III – ROLES AND RESPONSIBILITIES

ARTICLE 7

Governing Board and Board Safeguarding Lead

The Governing Board bears ultimate responsibility for safeguarding at CeMI. It shall adopt this Policy, appoint a Board Safeguarding Lead from among its members, and review an anonymised safeguarding

report at least twice a year.

The Board Safeguarding Lead shall:

1. oversee the implementation of this Policy and the handling of all serious cases;
2. be informed by the Safeguarding Focal Point of every safeguarding concern within 48 hours of its receipt, in anonymised form where possible;
3. receive concerns directly, including concerns about the Executive Director or the Safeguarding Focal Point;
4. ensure that donor reporting obligations are met;
5. present the annual safeguarding report to the Governing Board.

ARTICLE 8

Executive Director

The Executive Director is responsible for the operational implementation of this Policy, for ensuring adequate resources, for appointing the deputy Safeguarding Focal Point by written decision (the role of the Safeguarding Focal Point being performed by the Legal Department in accordance with Article 16), and for taking decisions on protective and disciplinary measures in accordance with the Complaints, Investigation and Disciplinary Procedure.

Where a concern relates to the Executive Director, the Executive Director shall be excluded from all handling of the case, and their responsibilities under this Policy shall be exercised by the Board Safeguarding Lead, with the Governing Board taking the final decision, in line with Article 6 of the SEAH Rulebook.

Where a concern relates to the President of the Governing Board, the Governing Board shall deal with it without the participation of the President, and any decision on dismissal shall be taken by the Assembly, in accordance with Articles 32 and 33 of the Statute.

Where the post of Executive Director is vacant, the responsibilities of the Executive Director under this Policy shall be exercised by the President of the Governing Board, save that decisions on disciplinary measures shall be taken by the Governing Board without the participation of the President, and the deputy Safeguarding Focal Point shall be appointed by the Head of the Legal Department (Articles 3 and 18a of the Rules of Procedure).

ARTICLE 9

Safeguarding Focal Point

The Safeguarding Focal Point (and their deputy, who shall, where possible, be of a different gender) is the first point of contact for safeguarding concerns. They shall:

1. receive, acknowledge and record concerns and carry out the initial assessment;
2. ensure the immediate safety of survivors and refer them to support services;
3. act as case manager or, in SEAH cases, support the Responsible Person under the SEAH Rulebook;
4. maintain the Safeguarding Case Register;
5. coordinate safeguarding risk assessments, training and awareness-raising activities;
6. advise managers, project teams and partners on safeguarding;
7. prepare the six-monthly safeguarding report for the Board Safeguarding Lead.

The Safeguarding Focal Point shall have completed recognised safeguarding training and shall be given sufficient time and independence to perform this role.

ARTICLE 10**Managers and all personnel**

Heads of departments, programme coordinators and project managers are responsible for ensuring that their teams and partners know and apply this Policy and that safeguarding risks in their projects are assessed and managed.

All CeMI personnel and associated persons shall comply with this Policy and the Code of Conduct, complete the required training, and report any safeguarding concern immediately in accordance with Article 15.

CHAPTER IV – PREVENTION

ARTICLE 11**Safer recruitment**

In addition to the conditions laid down in the Rulebook on Employment and Other Types of Work Engagement, the following safer recruitment measures shall apply to all staff, volunteers, interns, experts, consultants and election observers:

1. every job description and call for applications shall state CeMI's commitment to safeguarding and the safeguarding risk level of the role;
2. interviews for all staff positions shall include at least one safeguarding or values-based question;
3. at least two references shall be obtained for staff positions, and at least one for volunteers, consultants and long-term observers; referees shall be asked specifically about any safeguarding, harassment or misconduct concerns;
4. for roles with an elevated risk (direct contact with children or adults at risk, unsupervised field work, responsibility for observers), a certificate from the criminal records register and a certificate that no criminal proceedings are pending shall be required before engagement;
5. where donor or national schemes for the disclosure of misconduct between employers exist, CeMI shall participate in them to the extent permitted by law;
6. no person shall begin work before signing the Code of Conduct; the safeguarding induction shall be completed within the first month, in accordance with Article 12 of this Policy.

For short-term election observers recruited in large numbers, a proportionate procedure shall apply, consisting of a signed self-declaration that no criminal proceedings are pending against the person and that they have not previously been dismissed for misconduct, signature of the Code of Conduct, and completion of the safeguarding module of the observer training. CeMI may request supporting certificates at any time.

ARTICLE 12**Training and awareness**

1. All staff shall complete safeguarding induction within their first month and refresher training every year.
2. All volunteers and observers shall receive a safeguarding briefing as part of their training, covering the Code of Conduct, how to report and where to obtain help.
3. The Safeguarding Focal Point, the deputy and the Board Safeguarding Lead shall complete specialised training in case management and survivor-centred response.
4. Training attendance shall be recorded, and the records shall be made available to donors on request.
5. Information on how to report concerns shall be displayed in CeMI's offices, included in observer handbooks and published on CeMI's website.

ARTICLE 13**Safeguarding in projects and activities**

For every project, a safeguarding risk assessment shall be completed at the design stage, recorded in the project risk register and reviewed together with it, in accordance with Articles 8 and 9 of the Risk Management Policy. Particular attention shall be paid to:

1. the deployment of large numbers of observers, including travel, accommodation, night work and lone working;
2. activities involving children, young people or adults at risk;
3. events, training sessions, surveys and focus groups with members of the public;
4. online activities, data collection and the use of images.

ARTICLE 14**Communications, images and data**

CeMI shall obtain informed consent before taking or using photographs, video recordings or personal stories of any person. In the case of children, the consent of the parent or guardian and the assent of the child are required. Images shall preserve the dignity of the persons depicted, shall not be sexualised and shall not reveal information that could put a person at risk. Personal data of survivors and participants shall be processed in accordance with the Data Protection and Information Security Policy.

CHAPTER V – REPORTING AND RESPONDING

ARTICLE 15**Duty to report**

Every person covered by this Policy who becomes aware of, or suspects, a breach of this Policy shall report it immediately and in any event within 24 hours. Personnel are not required to establish proof or to investigate before reporting.

Members of the public, programme participants and partners may report concerns through any of the channels referred to in Article 16.

ARTICLE 16**Reporting channels**

The Legal Department of CeMI is responsible for receiving and handling all safeguarding concerns and performs the role of the Safeguarding Focal Point under this Policy. Concerns may be submitted to the Legal Department orally, in writing or by e-mail, openly, confidentially or anonymously. Concerns relating to SEAH shall also be handled in accordance with the SEAH Rulebook.

Reports concerning SEAH are also governed by the SEAH Rulebook, which this Policy supplements.

Anonymous reports shall be accepted and assessed. Anonymity may limit CeMI's ability to investigate and to provide feedback, and reporters are therefore encouraged to provide a means of contact.

ARTICLE 17**Receiving a concern**

A person who receives a disclosure shall: listen calmly and without judgement; not promise absolute confidentiality, but explain who will be informed; not question the survivor in detail or seek evidence; record the facts in the person's own words, with the date and time; and pass the information to the Safeguarding

Focal Point on the same day. Where a person is in immediate danger, the police or emergency services (in Montenegro: 122 police, 124 ambulance, 112 general emergency) shall be contacted first.

ARTICLE 18

Handling procedure and timelines

1. Immediate safety (within 24 hours): the Safeguarding Focal Point shall assess any immediate risk and take protective measures, such as separating the parties, suspending field deployment or providing safe transport.
2. Acknowledgement (within 2 working days): the reporter, where known, shall receive confirmation of receipt.
3. Initial assessment (within 5 working days): the Safeguarding Focal Point shall determine whether the concern falls within the scope of this Policy, its seriousness, whether the matter is required to be referred to the authorities, and the appropriate response (informal resolution, formal investigation, referral to a partner, or no further action, with the reasons recorded).
4. Investigation: where an investigation is required, it shall be conducted in accordance with the Complaints, Investigation and Disciplinary Procedure by trained and independent investigators, and shall normally be concluded within 30 working days.
5. Decision and follow-up: outcomes, measures and lessons learned shall be recorded, and the survivor and the reporter shall be informed of the outcome to the extent permitted by confidentiality requirements and the law.

Concerns involving a possible criminal offence shall be referred to the competent authorities, taking into account the wishes and safety of the survivor, save where referral is mandatory by law or a child is at risk, in which case referral shall not depend on the survivor's wishes.

ARTICLE 19

Support for survivors

CeMI shall provide or facilitate, in accordance with the survivor's needs and wishes: medical and psychosocial support, legal information, safe accommodation where needed, adjustments to working arrangements, and referral to specialised services (in Montenegro, among others, the SOS hotline for women and children victims of violence and the Centre for Social Work). Survivors may be accompanied by a trusted person of their choice at any meeting. Support shall not be conditional on the survivor agreeing to an investigation.

ARTICLE 20

Reporting to donors

CeMI shall inform the relevant donor of any credible safeguarding allegation connected with a project funded by that donor as soon as possible and no later than 24 hours after the initial assessment confirms that the concern is credible, or within any shorter time limit set by the grant agreement. CeMI shall keep donors informed of the progress and outcome of the case.

ARTICLE 21

Safeguarding Case Register and records

The Safeguarding Focal Point shall keep a confidential, access-restricted register of all concerns, including the date, category, project, actions taken, outcome and lessons learned. Case files shall be kept separately from personnel files, protected in accordance with the Data Protection and Information Security Policy, and retained for at least seven years after the case is closed, or longer where the law or a donor so requires.

CHAPTER VI – PARTNERS AND FINAL PROVISIONS

ARTICLE 22

Partners and sub-grantees

When selecting partners and sub-grantees, CeMI shall take their safeguarding practices into account, in proportion to the nature of the cooperation and the activities involved.

Partners and sub-grantees that do not have their own safeguarding policy shall undertake, by means of the partnership or sub-grant agreement, to apply the standards of this Policy and CeMI's Code of Conduct to activities implemented with CeMI. They shall also undertake to inform CeMI promptly of any safeguarding concern connected with those activities and to cooperate in resolving it.

Where needed, CeMI shall support partners in strengthening their safeguarding practices.

ARTICLE 23

Breaches

Breach of this Policy, failure to report a concern, retaliation and knowingly making a false allegation constitute disciplinary offences, which shall be dealt with under the Complaints, Investigation and Disciplinary Procedure and, in the case of associated persons, constitute grounds for termination of the contract or agreement. A report made in good faith that proves to be unfounded is not a false allegation.

ARTICLE 24

Relationship with other acts

This Policy supplements the SEAH Rulebook. With respect to safeguarding matters, the provisions of this Policy and of the Complaints, Investigation and Disciplinary Procedure on confidentiality, anonymous reporting and the non-disclosure of sanctions are consistent with Articles 25 and 29 of the Rules of Procedure and apply as special rules in safeguarding matters.

ARTICLE 25

Monitoring and review

The Safeguarding Focal Point shall monitor the implementation of this Policy and report to the Board Safeguarding Lead every six months. The Governing Board shall review the Policy annually.

A summary of the annual safeguarding report shall be included in the annual report on the work of the Governing Board submitted to the Assembly (Articles 12 and 28 of the Statute).

ARTICLE 26

Entry into force

This Policy shall enter into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

05

POLICY

CODE OF CONDUCT



POLICY

Code of Conduct

Standards of behaviour for staff, Governing Board members, volunteers, interns, experts, consultants and election observers, both at and away from the workplace

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI staff, Governing Board and Assembly members, volunteers, interns, scholarship holders, experts, consultants, short- and long-term election observers, and representatives of partners while working on CeMI activities
Review	Annually

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Purpose

This Code of Conduct sets out the standards of behaviour that CeMI expects of every person who works for it or on its behalf. It translates CeMI's values – integrity, independence, impartiality, respect for human rights and accountability – into clear rules and sets out the consequences of failing to observe them.

ARTICLE 2

Application

The Code applies to all persons listed in the document control table, both at and away from the workplace and including outside working hours, during travel, at events, on election day and online, whenever their conduct is connected with CeMI or could affect CeMI's reputation or the people with whom it works.

Every person shall read and sign the Declaration in Annex 1 before starting work. For election observers, signature of the Code is a condition of accreditation and deployment.

CHAPTER II – STANDARDS OF BEHAVIOUR

ARTICLE 3

Respect, dignity and non-discrimination

CeMI personnel shall:

1. treat colleagues, partners, programme participants, voters, officials and members of the public with courtesy, respect and dignity;
2. not discriminate on the grounds of sex, gender, ethnicity, nationality, religion, political opinion, disability, age, sexual orientation, gender identity, marital or family status, or any other personal characteristic;
3. not engage in bullying, harassment at work (mobbing), intimidation, humiliation or abusive language, whether in person or online;
4. respect the cultural and religious practices of others, provided that they do not conflict with human rights.

ARTICLE 4**Safeguarding and protection from sexual exploitation, sexual abuse and sexual harassment**

CeMI personnel shall never:

1. commit sexual exploitation, sexual abuse or sexual harassment against any person;
2. engage in any sexual activity with a person under 18, regardless of the local age of consent; mistaken belief as to the age of a child is not a defence;
3. exchange money, employment, goods, services, assistance or any other favour for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour; this includes the purchase of sexual services while on CeMI duty or travel;
4. use their position, influence or access to information to pressure any person into a sexual or intimate relationship;
5. take, share or possess sexualised or abusive images of any person, or inappropriate images of children;
6. physically, verbally or emotionally abuse any person, or put a child or adult at risk of harm.

ARTICLE 5**Duty to report**

CeMI personnel shall report immediately, and in any event within 24 hours, any concern or suspicion of a breach of this Code, of the Safeguarding Policy or of the SEAH Rulebook, through the channels set out in the Safeguarding Policy and the Whistleblowing Policy. Failure to report is in itself a breach of this Code.

ARTICLE 6**Integrity, honesty and use of resources**

CeMI personnel shall:

1. act honestly and never engage in fraud, theft, forgery or the falsification of records, timesheets, invoices, receipts or reports;
2. never offer, give, solicit or accept bribes, facilitation payments or improper advantages (Anti-Fraud, Anti-Bribery and Anti-Corruption Policy);
3. not accept gifts or hospitality except as permitted by the Anti-Fraud, Anti-Bribery and Anti-Corruption Policy, and register gifts as required by Article 7 of that Policy;
4. use CeMI's funds, vehicles, equipment, IT systems and other resources only for authorised purposes and protect them from loss, waste and misuse;
5. ensure that donor funds are used only for their intended purpose and in accordance with the grant agreement;
6. never knowingly deal with any person or entity that is subject to sanctions or associated with terrorism or organised crime (Counter-Terrorist Financing, Anti-Money Laundering and Sanctions Compliance Policy).

ARTICLE 7**Conflicts of interest**

CeMI personnel shall avoid situations in which their personal, family, financial or political interests conflict, or appear to conflict, with their duties, and shall declare any actual, potential or perceived conflict of interest in accordance with the Conflict of Interest Policy.

ARTICLE 8**Political neutrality and independence**

CeMI is a non-partisan organisation. In connection with their CeMI role, personnel – and election observers at all times during their engagement – shall:

1. remain strictly impartial towards all political parties, candidates and electoral participants;
2. not publicly express support for, or opposition to, any party, candidate or electoral list, including on social media;
3. not hold office in, or act as a candidate, polling-board member, proxy or observer for, any political party or electoral participant during the period of engagement;
4. not accept instructions from any government, party or third party;
5. report observations accurately and objectively, without exaggeration or omission.

ARTICLE 9**Specific rules for election observers**

In addition to the other provisions of this Code, election observers shall:

1. respect the electoral legislation and the authority of the election administration bodies, and never obstruct the electoral process;
2. wear their accreditation visibly and identify themselves on request;
3. not interfere in voting, counting or tabulation, and not give instructions to voters or polling-board members;
4. not use, or be under the influence of, alcohol or drugs while on duty;
5. respect the secrecy of the vote and not photograph ballots or voters;
6. treat all information obtained during observation as confidential and share it only through CeMI's reporting system;
7. follow CeMI's security instructions and immediately report any incident, threat, harassment or safety risk.

Election observers are also bound by the Code of Conduct for Election Observers (Annex 2), which forms an integral part of this Code and of every observer engagement agreement. In the event of any inconsistency, the stricter provision shall apply.

ARTICLE 10**Confidentiality, data protection and communications**

CeMI personnel shall protect the confidentiality of CeMI's information and the personal data of colleagues, participants and survivors in accordance with the Data Protection and Information Security Policy. Only authorised persons may speak to the media on behalf of CeMI, in accordance with the Rules of Procedure. Personal social-media activity shall not damage CeMI's reputation, compromise its neutrality or disclose confidential information.

ARTICLE 11**Health, safety and well-being**

CeMI personnel shall comply with health and safety rules, take reasonable care of their own safety and that of others, not work under the influence of alcohol or drugs, and not carry weapons while on CeMI duty.

ARTICLE 12**Additional responsibilities of managers**

Heads of departments, programme coordinators, project managers and persons coordinating election observers shall model the standards of this Code, ensure that their teams and partners understand it, create an environment in which people feel safe to raise concerns, and act on every concern brought to their attention.

CHAPTER III – COMPLIANCE

ARTICLE 13**Breach of the Code**

Any breach of this Code shall be assessed and, where appropriate, investigated under the Complaints, Investigation and Disciplinary Procedure. Depending on the seriousness of the breach, the consequences may include: a warning, training or other corrective measures, removal from a project or from observation duties, withdrawal of accreditation, termination of the employment or service contract, exclusion from future engagement and from the list of experts, recovery of losses, and referral to the competent authorities.

In the case of members of the Assembly, a breach of this Code may constitute grounds for termination of membership, on which the Governing Board shall decide after the member concerned has been given an opportunity to state their position (Article 42 of the Statute). Measures concerning the President of the Governing Board that involve dismissal shall be decided by the Assembly (Articles 32 and 33 of the Statute).

ARTICLE 14**Advice**

Any person who is unsure whether a course of action complies with this Code should seek advice from their manager, the Safeguarding Focal Point or the Integrity and Compliance Officer before acting.

ARTICLE 15**Entry into force**

This Code shall enter into force on the day of its adoption by the Governing Board. Persons already engaged by CeMI shall sign the Declaration within 30 days of its entry into force.

Podgorica, February 2026

Annex 1 – Declaration of Acceptance

I, the undersigned, confirm that:

1. I have received, read and understood the CeMI Code of Conduct, the Safeguarding Policy and the SEAH Rulebook;
2. I agree to comply with them during my engagement with CeMI, both inside and outside the workplace;
3. I understand that I have a duty to report any concern about abuse, exploitation, harassment, fraud or other misconduct, and that I will be protected from retaliation when I report in good faith;
4. I understand that a breach may lead to disciplinary measures, termination of my engagement and referral to the competent authorities;
5. I confirm that I have not been dismissed, or had a contract terminated, for sexual misconduct, abuse, harassment or fraud, or that I have disclosed the details to CeMI in writing;
6. (only for the roles referred to in Article 11 of the Safeguarding Policy) I confirm that no criminal proceedings are pending against me for criminal offences relevant to the role.

Full name: _____

Role: _____

Signature: _____ **Date:** _____

Annex 2 – Code of Conduct for Election Observers

1. Election observers shall remain impartial at all times while on duty and shall not under any circumstances express their personal preferences regarding the outcome of the elections or any of the participants in the electoral process.
2. Election observers shall perform their duties professionally and shall not interfere in the electoral process. Their role is to observe the process and record any irregularities; they shall not under any circumstances interfere in the decision-making of electoral bodies and participants.
3. Election observers shall base their findings not solely on personal observations but also on clear, convincing and objective evidence.
4. Election observers shall not give statements to the media regarding the observation of the electoral process or their findings; communication with the media shall be conducted only by persons authorised by CeMI (Article 10 of this Code).
5. Election observers shall not expose themselves to unnecessary risks. The personal safety of each observer is of the utmost importance.
6. Election observers shall wear their official accreditation while on duty and present it to the competent authorities on request. Observers shall also wear CeMI's identification insignia.
7. Election observers shall fully respect the laws of Montenegro.
8. Election observers shall keep confidential all information obtained during observation, both on election day and after the elections.
9. Election observers shall dress and behave appropriately on election day.
10. Election observers shall perform their duties conscientiously at all times, in accordance with the instructions of the person coordinating election observers and with the highest professional standards.
11. Election observers shall comply with the CeMI Code of Conduct, the Safeguarding Policy and the SEAH Rulebook, and shall immediately report any incident, threat, harassment or abuse to the person coordinating election observers or through CeMI's reporting channels.

I hereby declare that I will comply with the Code of Conduct for Election Observers.

Full name: _____

Signature: _____ **Date:** _____

06

POLICY

WHISTLEBLOWING POLICY



POLICY

Whistleblowing Policy

Speaking up safely about wrongdoing – reporting channels, protection from retaliation, responsibilities and time limits

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI personnel and associated persons, partners, sub-grantees, suppliers, programme participants and members of the public
Review	Annually

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Purpose

CeMI wishes everyone who works with it to feel safe in speaking up about wrongdoing. This Policy sets out what may be reported, how and to whom, how reports are handled and within what time limits, and how whistleblowers are protected from retaliation.

ARTICLE 2

What can be reported

A whistleblowing report may concern any actual or suspected:

1. fraud, theft, embezzlement, misuse or diversion of funds or assets, including donor funds;
2. bribery, corruption, kickbacks, collusion or bid-rigging in procurement;
3. money laundering, terrorist financing or breach of sanctions;
4. sexual exploitation, abuse or harassment, bullying, other forms of harassment or any other safeguarding concern;
5. breach of the Code of Conduct or any other CeMI policy;
6. breach of personal data protection rules;
7. breach of law, of a grant agreement or of donor rules;
8. falsification of records, reports, election-observation data or research data;
9. danger to health, safety or the environment;
10. breach of personal data protection;
11. retaliation against a person who has raised a concern;
12. deliberate concealment of any of the above.

Personal grievances concerning a person's own employment conditions that do not involve wrongdoing are dealt with under the grievance provisions of the Complaints, Investigation and Disciplinary Procedure and not under this Policy.

ARTICLE 3

Who is protected

Protection under this Policy extends to any person who raises a concern in good faith (the “whistleblower”), whether or not employed or engaged by CeMI, as well as to persons who assist the whistleblower, to witnesses and to persons who cooperate with an investigation.

A person raises a concern in good faith where they have reasonable grounds to believe that the information is true at the time of reporting. They are not required to have proof, and they remain protected if the concern proves to be mistaken.

CHAPTER II – HOW TO REPORT

ARTICLE 4

Internal reporting channels

The Legal Department of CeMI is responsible for receiving and handling whistleblowing reports, and the Head of the Legal Department acts as the Integrity and Compliance Officer for the purposes of this Policy and Article 18a of the Rules of Procedure. Reports may be submitted to the Legal Department orally, in writing or by e-mail, openly, confidentially or anonymously.

Reports concerning the Integrity and Compliance Officer or the Executive Director may be submitted directly to the President of the Governing Board, and reports concerning the President may be submitted to any other member of the Governing Board.

ARTICLE 5

External reporting channels

Whistleblowers are encouraged to report internally first, but they may report directly to an external body at any time, in particular where they believe that internal reporting would be ineffective or would expose them to retaliation, or where the matter involves senior management. External channels include:

1. for FCDO-funded activities: FCDO Reporting Concerns – reportingconcerns@fcdo.gov.uk;
2. the reporting mechanisms of other donors, such as the European Anti-Fraud Office (OLAF) for EU-funded activities;
3. the competent anti-corruption authority, namely the Agency for Prevention of Corruption, which protects whistleblowers under the Law on Prevention of Corruption;
4. the police and the State Prosecutor’s Office, where a criminal offence is suspected.

ARTICLE 6

Content of a report

A report should, where possible, include: what happened, when and where; who was involved; how the reporter came to know of it; any documents or other evidence; and, unless the report is anonymous, the reporter’s contact details. Reporters should not attempt to investigate the matter or gather evidence themselves.

ARTICLE 7

Anonymous reports

Anonymous reports shall be accepted and assessed on their merits, taking into account the seriousness and credibility of the concern and the possibility of verifying it. Anonymous reporters are encouraged to use a channel through which CeMI can contact them for further information, such as an anonymous e-mail address.

CHAPTER III – HANDLING OF REPORTS

ARTICLE 8

Procedure and time limits

1. Registration and acknowledgement – within 2 working days: the report shall be recorded in the confidential Integrity Case Register and, where the whistleblower's identity is known, the whistleblower shall receive a written acknowledgement.
2. Preliminary assessment – within 10 working days: the Integrity and Compliance Officer shall assess whether the report falls within the scope of this Policy, whether there is sufficient information, whether urgent measures are needed (for example, protecting evidence or freezing payments), and whether the donor or the authorities need to be informed.
3. Investigation: where warranted, an investigation shall be conducted in accordance with the Complaints, Investigation and Disciplinary Procedure, normally within 30 working days of the decision to investigate. In complex cases this period may be extended, in which case the whistleblower shall be informed of the extension.
4. Feedback – no later than 3 months from acknowledgement: the whistleblower shall be informed of the action taken or planned and, to the extent permitted by confidentiality requirements and the law, of the outcome.
5. Closure: the outcome, the measures taken and the lessons learned shall be recorded in the Integrity Case Register.

Safeguarding concerns shall be handled in accordance with the Safeguarding Policy and the SEAH Rulebook, which provide for shorter time limits in order to ensure immediate safety.

ARTICLE 9

Independence and conflicts of interest

No person shall handle a report in which they are implicated or in which they have a conflict of interest. Where the report concerns the Integrity and Compliance Officer or the Executive Director, it shall be handled by the President of the Governing Board, who may appoint an independent external investigator.

Where the report concerns the President of the Governing Board, it shall be handled by the Governing Board without the participation of the President. Findings that may justify dismissal shall be submitted to the Assembly, which decides in accordance with Articles 32 and 33 of the Statute.

ARTICLE 10

Reporting to donors and authorities

Any credible suspicion of fraud, corruption, aid diversion, terrorist financing or money laundering, or of a safeguarding incident, connected with donor funding shall be reported to the donor in accordance with the Anti-Fraud, Anti-Bribery and Anti-Corruption Policy and the Safeguarding Policy. Matters that may constitute a criminal offence shall be referred to the competent authorities.

CHAPTER IV – PROTECTION

ARTICLE 11

Confidentiality

The identity of the whistleblower, and any information from which it could be deduced, shall be disclosed only to those who strictly need to know it in order to handle the report, and only with the whistleblower's consent, unless disclosure is required by law or by court order. In that case, the whistleblower shall be

informed in advance, unless this would jeopardise the investigation.

ARTICLE 12

Protection from retaliation

CeMI prohibits any form of retaliation against a whistleblower or any other person protected under Article 3, including dismissal, demotion, termination or non-renewal of a contract, loss of engagement as an expert or observer, reduction in pay, unfavourable assignment, intimidation, harassment, exclusion, negative references and threats of any of the foregoing.

Any person who believes that they have suffered retaliation should report it immediately under this Policy. Retaliation shall be treated as serious misconduct under the Complaints, Investigation and Disciplinary Procedure. CeMI shall take measures to remedy the consequences of retaliation.

ARTICLE 13

Malicious reports

Knowingly making a false report constitutes a disciplinary offence. A report made in good faith that is not substantiated shall not give rise to any adverse consequences for the reporter.

CHAPTER V – FINAL PROVISIONS

ARTICLE 14

Records and data protection

Reports and case files shall be kept confidential, stored securely with restricted access in accordance with the Data Protection and Information Security Policy, and retained for at least seven years after closure of the case, or longer where required by law or donor rules.

ARTICLE 15

Awareness and monitoring

This Policy shall be published on CeMI's website, included in induction and observer training, and displayed in CeMI's offices.

ARTICLE 16

Relationship with other acts

Reports under this Policy may be made anonymously, in accordance with Article 29 of the Rules of Procedure, and decisions taken on them shall not be publicly disclosed.

ARTICLE 17

Entry into force

This Policy enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

07

PROCEDURE

COMPLAINTS, INVESTIGATION AND DISCIPLINARY PROCEDURE



PROCEDURE

Complaints, Investigation and Disciplinary Procedure

How CeMI receives complaints, investigates allegations of misconduct and takes fair disciplinary decisions

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI personnel and associated persons; complaints from partners, programme participants and members of the public
Review	Annually

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Purpose and relationship with other acts

This Procedure establishes:

1. a feedback and complaints mechanism open to anyone affected by CeMI's work;
2. a standard procedure for investigating allegations of misconduct, including those relating to safeguarding, SEAH, fraud and corruption;
3. fair and proportionate disciplinary measures and the right of appeal.

This Procedure implements and supplements Articles 25 and 26 of the Rules of Procedure and Articles 7, 9 and 10 of the SEAH Rulebook. In the event of any inconsistency, the provisions of this Procedure on confidentiality, anonymous reports, investigation standards and appeal deadlines shall prevail.

ARTICLE 2

Principles

All complaints and investigations shall be handled in accordance with the following principles: confidentiality; impartiality and independence; promptness; a survivor-centred approach in safeguarding cases; the presumption of innocence and the right of the subject of concern to be heard; proportionality of measures; non-retaliation; and compliance with labour legislation and data protection law.

CHAPTER II – FEEDBACK AND COMPLAINTS MECHANISM

ARTICLE 3

Who may complain and how

Any person – including programme participants, voters, observers, partners, suppliers and members of the public, as well as CeMI personnel – may submit feedback or a complaint about CeMI's work or the conduct of its personnel:

1. in person, or by letter addressed to CeMI's office;
2. through the complaint boxes or contact details distributed at CeMI events and in observer materials.

Complaints may be submitted anonymously. Information on the mechanism shall be published in Montenegrin and English and, where relevant, in the languages of the communities concerned.

ARTICLE 4**Handling of complaints**

Complaints shall be registered and acknowledged within 2 working days. Complaints concerning services or decisions shall be answered within 15 working days. Complaints alleging misconduct shall be referred immediately to the Integrity and Compliance Officer or, in safeguarding matters, to the Safeguarding Focal Point, and shall be dealt with under Chapter III.

ARTICLE 5**Personnel grievances**

Personnel who have a grievance concerning their own working conditions, their treatment or a decision affecting them should first raise it with their line manager. If the grievance is not resolved within 10 working days, they may submit a written grievance to the Executive Director, who shall decide on it within 15 working days after hearing the person concerned. Grievances concerning the Executive Director shall be submitted to the President of the Governing Board, and grievances concerning the President to the Governing Board. Bullying and harassment shall always be treated as misconduct under Chapter III and may also be pursued through the procedures provided for by the law on the prohibition of harassment at work.

CHAPTER III – INVESTIGATIONS**ARTICLE 6****Decision to investigate**

The Integrity and Compliance Officer – or, in safeguarding cases, the Safeguarding Focal Point and, in SEAH cases, the Responsible Person under the SEAH Rulebook – shall decide, within 10 working days of receiving an allegation (or, in safeguarding cases, within 5 working days), whether a formal investigation is required, on the basis of the seriousness and credibility of the allegation. The decision and the reasons for it shall be recorded.

ARTICLE 7**Investigation Terms of Reference and investigators**

For each investigation, written Terms of Reference shall be prepared setting out the allegations, the scope, the investigator or investigators, the timetable and the reporting arrangements.

ARTICLE 8**Protective and precautionary measures**

During the investigation, the Executive Director (or the President of the Governing Board where the Executive Director is implicated, or the Governing Board where the President is implicated) may impose precautionary measures to protect persons, evidence and assets, such as temporary reassignment, suspension from field or observer duties, restriction of access to systems or premises, or paid administrative leave in accordance with the law.

Precautionary measures do not constitute disciplinary sanctions and do not imply guilt.

ARTICLE 9**Conduct of the investigation**

1. Evidence, including documents, e-mails, financial records and witness statements, shall be collected and preserved securely.

2. The subject of concern shall be informed of the allegations in sufficient detail to enable them to respond, at a stage that does not compromise the safety of the survivor or the integrity of the evidence, and is entitled to be heard, to submit evidence and to be accompanied at interviews by a person of their choice.
3. Survivors and witnesses shall be interviewed in a safe and private setting; survivors shall not be required to face the subject of concern.
4. Records of interviews shall be signed by the interviewee or certified by two investigators.
5. Standard of proof: findings shall be made on the balance of probabilities, that is, on whether it is more likely than not that the alleged conduct occurred.
6. The investigation shall normally be completed within 30 working days; any extension shall be justified in writing.

ARTICLE 10

Investigation report

The investigator or investigators shall submit a written, confidential report setting out the allegations, the evidence, the findings of fact on each allegation and conclusions as to whether CeMI's policies were breached. The report shall not recommend a sanction unless requested to do so.

CHAPTER IV – DISCIPLINARY MEASURES

ARTICLE 11

Decision-making

On the basis of the investigation report, the Executive Director shall decide on the disciplinary measure within 10 working days, after giving the person concerned an opportunity to comment on the findings. In accordance with Article 25 of the Rules of Procedure, the final decision shall be confirmed by the President of the Governing Board.

Where the Executive Director is the subject of concern, the decision shall be taken by the Governing Board without the participation of any member with a conflict of interest; where dismissal of the Executive Director is proposed, the Assembly shall decide in accordance with Articles 12 and 34 of the Statute.

Where the President of the Governing Board is the subject of concern, the Governing Board shall decide without the participation of the President, and any decision on dismissal shall be taken by the Assembly (Articles 32 and 33 of the Statute). Where the post of Executive Director is vacant and its powers are exercised by the President of the Governing Board, the disciplinary measure shall be decided by the Governing Board without the participation of the President, and any appeal shall be decided by the Assembly (Articles 3 and 26 of the Rules of Procedure).

Termination of the membership of a member of the association shall be decided by the Governing Board in accordance with Article 42 of the Statute.

ARTICLE 12

Measures

Depending on the seriousness of the breach, intent, repetition, the harm caused and any mitigating circumstances, the following measures may be imposed:

1. for employees, the measures set out in Article 25 of the Rules of Procedure, in accordance with the Labour Law and the employment contract;

2. for experts, consultants, volunteers, interns, scholarship holders and election observers: a written warning, removal from a project, from observer duty or from the list of experts, or termination of the engagement, in accordance with the relevant contract or agreement.

In addition to these measures, mandatory training or supervision may be ordered as a corrective measure, losses shall be recovered and, where appropriate, the matter shall be referred to the competent authorities. An employee may be removed from a managerial role only by means of an amendment to the employment contract in accordance with the Labour Law.

Sexual exploitation and abuse, sexual abuse of a child, serious sexual harassment, fraud, corruption and retaliation against a whistleblower shall, as a rule, constitute grounds for termination, in accordance with the procedure laid down in the Labour Law.

In the case of partners and suppliers, a proven breach may result in suspension of payments, termination of the agreement, recovery of funds and exclusion from future cooperation.

ARTICLE 13

Confidentiality of decisions

Disciplinary decisions shall be communicated in writing to the person concerned and recorded in their personnel file. In accordance with Article 25 of the Rules of Procedure, decisions and sanctions in safeguarding, SEAH, whistleblowing and other misconduct cases shall not be publicly disclosed.

Survivors and reporters shall be informed of the outcome to the extent necessary for their protection and permitted by law. Where appropriate, anonymised lessons learned shall be shared within CeMI.

ARTICLE 14

Appeal

The person against whom a disciplinary decision has been taken may lodge a written appeal within 8 days of receipt of the decision. The appeal shall be decided within 15 working days by three members of the Governing Board who did not take part in the first-instance decision; the President of the Governing Board, having confirmed that decision, shall not take part. Where the first-instance decision was taken by the Governing Board, the appeal shall be decided by the Assembly. The appeal decision is final within CeMI; the internal appeal is without prejudice to the statutory time limits for seeking protection before the competent court or the Agency for Peaceful Settlement of Labour Disputes.

CHAPTER V – RECORDS, REPORTING AND LEARNING

ARTICLE 15

Records

All complaints, investigations and disciplinary decisions shall be recorded in the confidential Integrity Case Register or the Safeguarding Case Register, as applicable, and retained in accordance with the Data Protection and Information Security Policy.

ARTICLE 16

Reporting

Donors shall be informed of allegations, investigations and outcomes in accordance with the Safeguarding Policy, the Whistleblowing Policy, the Anti-Fraud, Anti-Bribery and Anti-Corruption Policy and the applicable grant agreements.

ARTICLE 17**Entry into force**

This Procedure enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

08

POLICY

ANTI-FRAUD, ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



POLICY

Anti-Fraud, Anti-Bribery and Anti-Corruption Policy

Zero tolerance of fraud, bribery and corruption – prevention, detection, reporting, response and recovery, including the Fraud Response Plan

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI personnel and associated persons, partners, sub-grantees, suppliers and contractors involved in CeMI activities or donor-funded projects
Review	Annually, together with the annual fraud risk assessment

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Policy statement

CeMI has zero tolerance of fraud, bribery and corruption in any form and by anyone. As an organisation that monitors integrity and good governance in public life, CeMI holds itself to the highest standards. Every case of suspected fraud, bribery or corruption shall be reported, assessed and, where appropriate, investigated; losses shall be recovered; and those responsible shall be subject to disciplinary, contractual and legal action.

ARTICLE 2

Purpose and scope

This Policy sets out how CeMI prevents, detects, reports and responds to fraud, bribery and corruption, and how it protects donor and organisational funds. It applies to all funds and assets managed by CeMI, irrespective of their source, and to all of CeMI's activities in Montenegro.

ARTICLE 3

Definitions

1. Fraud – any intentional act or omission, including misrepresentation, aimed at obtaining a financial or other advantage or at causing a loss, such as false claims; falsified invoices, receipts, timesheets or per diem claims; theft of cash or assets; fictitious participants or observers; double funding of the same cost from different donors; and manipulation of accounts or reports.
2. Bribery – offering, promising, giving, requesting or accepting any advantage, financial or otherwise, in order to induce or reward the improper performance of a function.
3. Facilitation payment – a small unofficial payment made to a public official in order to expedite or secure the performance of a routine action. Facilitation payments are a form of bribery and are prohibited.
4. Corruption – the abuse of entrusted power for private gain, including bribery, nepotism, cronyism, collusion, kickbacks and bid-rigging.
5. Aid diversion – the use of donor funds or assets for purposes other than those agreed with the donor.

CHAPTER II – PREVENTION

ARTICLE 4

Internal controls

CeMI prevents fraud through the controls set out in the Rulebook on Financial Operations and Procurement, which are mandatory, in particular:

1. segregation of duties – no single person shall initiate, approve, execute and record the same transaction;
2. dual authorisation of every payment, with approval by the Executive Director or the President of the Governing Board;
3. payment by bank transfer as the rule, with cash payments permitted only up to EUR 100;
4. procurement thresholds and competitive procedures (Article 21 of the Rulebook), with stricter donor rules applied where applicable;
5. monthly bank reconciliations and unannounced cash counts;
6. timesheets signed by the employee and their supervisor and reconciled with payroll and donor charging;
7. budget-versus-actual reviews for each project at least every two weeks, and a monthly management review;
8. access controls and daily backups of the accounting system;
9. consistency checks between narrative and financial reports before any donor report is signed;
10. an annual financial audit and donor-mandated project audits.

ARTICLE 5

Additional controls for donor-funded projects

For each donor-funded project, CeMI:

1. records all costs in a separate project cost centre and prevents the double charging of costs to more than one donor;
2. keeps complete supporting documentation for every expense (contract, invoice, proof of delivery, proof of payment, participant lists with signatures, travel orders);
3. checks participant and observer lists for duplicates and verifies a sample of observer payments against deployment records;
4. includes anti-fraud, anti-corruption, audit-access and reporting clauses in all contracts and sub-grant agreements.

ARTICLE 6

Fraud risk assessment

Within the framework of the Risk Management Policy, the Head of the Finance and Public Relations Department, together with the Integrity and Compliance Officer, shall carry out an annual fraud risk assessment and a project-level assessment for each new donor-funded project. High-risk areas – such as cash payments to observers, per diems, procurement, events and sub-grants – shall be subject to additional controls and spot checks.

ARTICLE 7

Gifts and hospitality

1. CeMI personnel shall not solicit any gift, hospitality or other benefit in connection with their work.

2. They may accept only occasional gifts of symbolic value (up to EUR 30 per gift and no more than EUR 100 per year from the same source) and modest hospitality that is customary and proportionate and is not intended to influence a decision.
3. Gifts in cash or cash equivalents, gifts from suppliers or bidders during a procurement procedure and any gift from a political party, candidate or electoral participant shall always be refused.
4. Every gift or item of hospitality offered above the symbolic value, whether accepted or declined, shall be entered in the Gifts and Hospitality Register kept by the Integrity and Compliance Officer.
5. Gifts or hospitality offered by CeMI to others shall be modest, transparent and recorded, and shall never be intended to obtain an improper advantage.

ARTICLE 8

Political and charitable contributions

CeMI shall not make contributions to political parties, candidates or electoral participants. Sponsorships and donations by CeMI require the prior written approval of the Executive Director, within the limits set by a decision of the Governing Board (Article 28 of the Statute), and shall be recorded.

ARTICLE 9

Recruitment and partners

Fraud and integrity risks shall be taken into account in recruitment (Safeguarding Policy, Article 11) and in the selection of partners and suppliers (Partner Due Diligence and Downstream Partner Management Policy). Relatives and persons with a conflict of interest shall not take part in each other's selection, approval or supervision (Conflict of Interest Policy).

ARTICLE 10

Training and awareness

All staff shall receive anti-fraud and anti-corruption training at induction and annually thereafter, with additional training for finance, procurement and project management staff.

CHAPTER III – REPORTING AND RESPONSE

ARTICLE 11

Duty to report

Any person who suspects fraud, bribery, corruption or aid diversion shall report it immediately through the channels provided for in the Whistleblowing Policy. Reporters shall not investigate the matter themselves or alert the suspected person.

ARTICLE 12

Fraud Response Plan

Upon receipt of a report of suspected fraud, bribery or corruption, the Integrity and Compliance Officer, in cooperation with the Finance and Public Relations Department, shall:

1. register the report in the Integrity Case Register and secure the relevant documents, records and assets;
2. inform the President of the Governing Board and the Executive Director without delay, unless one of them is implicated;
3. notify the donor immediately, and in any event within 2 working days, or within any shorter time limit set by the grant agreement;

4. assess the report and, where justified, conduct an investigation in accordance with the Complaints, Investigation and Disciplinary Procedure;
5. refer the matter to the competent authorities where a criminal offence is suspected.

On the basis of the findings, CeMI shall take disciplinary or contractual measures, recover any losses, refund ineligible amounts to the donor and strengthen its controls where necessary. CeMI shall cooperate fully with donor investigators and auditors.

ARTICLE 13

Recovery of losses

CeMI shall pursue the recovery of all losses caused by fraud or corruption, including by way of set-off, civil proceedings and insurance claims, and shall repay to the donor any funds lost or used for ineligible purposes, in accordance with the grant agreement.

ARTICLE 14

Sanctions

Fraud, bribery, corruption and aid diversion constitute serious misconduct and shall, as a rule, result in termination of employment or of the contract, in addition to recovery of losses and criminal proceedings. Failure to report a known or suspected case and retaliation against a whistleblower also constitute disciplinary offences.

CHAPTER IV – FINAL PROVISIONS

ARTICLE 15

Records and reporting

Fraud and corruption cases shall be recorded in the Integrity Case Register kept by the Integrity and Compliance Officer, who shall report to the Governing Board at least twice a year on cases, losses, recoveries and improvements to controls. A summary shall be included in the annual report on the work of the Governing Board submitted to the Assembly.

ARTICLE 16

Entry into force

This Policy enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

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POLICY

**COUNTER-TERRORIST FINANCING, ANTI-
MONEY LAUNDERING AND SANCTIONS
COMPLIANCE POLICY**



POLICY

Counter-Terrorist Financing, Anti-Money Laundering and Sanctions Compliance Policy

Ensuring that no CeMI or donor funds or assets benefit terrorists, sanctioned persons or criminal activity

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI personnel; all partners, sub-grantees, suppliers, consultants and other recipients of CeMI funds or assets
Review	Annually

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Policy statement

CeMI shall not knowingly provide funds, assets or support of any kind, directly or indirectly, to any person or entity that is involved in terrorism, money laundering or organised crime or is subject to applicable sanctions. CeMI shall take all reasonable steps to ensure that the funds it manages, including donor funds, are not diverted for such purposes.

ARTICLE 2

Legal framework

CeMI shall comply with the legislation of Montenegro on the prevention of money laundering and terrorist financing and on international restrictive measures, and with the sanctions regimes and requirements applicable under its grant agreements, including those of the United Nations, the European Union, the United Kingdom and, where required by the donor, the United States.

ARTICLE 3

Definitions

1. Terrorist financing – the provision or collection of funds or assets, by any means, with the intention or in the knowledge that they will be used to carry out terrorist acts or by a terrorist organisation or an individual terrorist.
2. Money laundering – the concealment or disguise of the origin of the proceeds of crime.
3. Sanctions lists – lists of designated persons and entities subject to asset freezes or other restrictive measures, including the UN Security Council Consolidated List, the EU Consolidated Financial Sanctions List, the UK Sanctions List, the US OFAC SDN List (where required) and national lists.
4. Counterparty – any partner, sub-grantee, supplier, consultant, landlord or other person or entity receiving CeMI funds or assets.

CHAPTER II – SCREENING AND DUE DILIGENCE

ARTICLE 4

Who is screened

The following shall be screened against the sanctions lists before any contract or agreement is concluded or any payment is made, and again whenever the lists are significantly updated, or at least once a year in the case of continuing relationships:

1. partners and sub-grantees, including their legal representatives and key personnel;
2. suppliers and service providers under any contract above EUR 1,000, and all international suppliers;
3. consultants, experts and staff, upon recruitment;
4. landlords and lessors;
5. any donor or contributor providing funds to CeMI, other than a recognised public or international donor.

Individual programme participants, voters, survey respondents and short-term election observers shall not be routinely screened unless there is a specific risk indicator or the donor so requires.

ARTICLE 5

Screening procedure

1. Screening shall be carried out by the Financial Manager, or by a person designated by the Head of the Finance and Public Relations Department, using the official online search tools of the relevant sanctions lists or an approved screening service.
2. The result, the date, the lists checked and the name of the person who carried out the check shall be recorded and kept with the contract or payment documentation.
3. A possible match shall not be disclosed to the counterparty. It shall be escalated to the Integrity and Compliance Officer on the same day, and no payment shall be made and no contract shall proceed until the match is resolved.
4. A confirmed match shall be reported immediately to the Executive Director, the President of the Governing Board, the donor and the competent authorities, and no funds or assets shall be provided.

ARTICLE 6

Know your partner and supplier

In addition to screening, CeMI shall verify the legal registration, ownership, management and bank account of partners and significant suppliers in accordance with the Partner Due Diligence and Downstream Partner Management Policy and the procurement rules. Payments shall be made only to bank accounts held in the name of the contracted entity or person with a bank in Montenegro, unless otherwise justified and approved in writing by the Executive Director.

ARTICLE 7

Red flags

Personnel shall be alert to, and shall immediately report, warning signs such as requests for payment in cash or into third-party or offshore accounts; reluctance to provide identification or ownership information; unusual or unexplained transactions; links to proscribed or extremist groups; and requests to change bank details without verification.

CHAPTER III – FINANCIAL CONTROLS AND REPORTING

ARTICLE 8

Use of the banking system

All significant transactions shall be made through regulated banks, in accordance with the Rulebook on Financial Operations and Procurement. CeMI shall not accept anonymous donations above EUR 100 and shall verify the source of any unusual donation before accepting it.

ARTICLE 9**Contract clauses**

All partnership, sub-grant, supply and consultancy contracts shall contain a clause by which the counterparty confirms that it is not subject to sanctions and undertakes not to use the funds to support terrorism or any other illegal activity, to screen its own counterparties and to report any concern to CeMI immediately.

ARTICLE 10**Reporting**

Any suspicion of terrorist financing, money laundering or a breach of sanctions shall be reported immediately under the Whistleblowing Policy and the Fraud Response Plan and, where required by law, to the competent financial intelligence unit or the police.

ARTICLE 11**Training and records**

Screening records shall be retained for at least seven years, or longer where required by donors.

ARTICLE 12**Entry into force**

This Policy enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

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POLICY

CONFLICT OF INTEREST POLICY



POLICY

Conflict of Interest Policy

Identification, declaration and management of conflicts of interest to protect CeMI's independence, impartiality and integrity

Adopted by	Governing Board of CeMI, February 2026
Applies to	Governing Board and Assembly members, all staff, experts, consultants, volunteers, election observers, and members of selection and evaluation committees
Review	Annually

ARTICLE 1

Purpose

CeMI is an independent election observation organisation, and its credibility depends on its decisions being, and being seen to be, free from personal, family, financial or political influence. This Policy defines conflicts of interest and lays down how they are to be declared, recorded and managed.

ARTICLE 2

Definition

A conflict of interest exists where the private interest of a person, or that of a related person, could influence, or could reasonably be perceived as influencing, the impartial and objective performance of that person's duties for CeMI. A conflict may be actual, potential or perceived; each shall be declared. Related persons include: a spouse or partner; blood relatives in the direct line and up to the third degree; relatives by marriage up to the second degree; persons related by adoption; persons sharing the same household; and any legal entity in which the person or a related person holds a management position or a significant ownership interest.

ARTICLE 3

Typical situations

A conflict of interest arises in particular where a person:

1. takes part in a procurement procedure or in a contract in which a related person or related entity is a bidder or supplier;
2. takes part in the selection or monitoring of a partner or sub-grantee with which they or a related person are connected;
3. holds a position in, or acts on behalf of, a political party, candidate, electoral participant or public authority monitored by CeMI;
4. undertakes paid or unpaid outside work that competes with CeMI or affects their availability or impartiality;
5. uses information belonging to CeMI for private gain;
6. accepts gifts or hospitality in excess of the limits laid down in the Anti-Fraud, Anti-Bribery and Anti-Corruption Policy.

ARTICLE 4**Annual and ad hoc declarations**

1. Any new conflict shall be declared in writing as soon as it arises and before the person concerned takes part in the related decision.
2. Members of the Governing Board, the Executive Director, the Programme Director, Heads of Department and staff responsible for finance and procurement shall submit a Declaration of Interests (Annex 1) at the start of their engagement and annually thereafter by 31 January.
3. Members of recruitment committees, procurement and evaluation committees and partner selection committees shall sign a declaration of no conflict of interest for each procedure.
4. Election observers shall declare, when applying, any political affiliation or any role in the electoral process.

ARTICLE 5**Management of conflicts**

Conflicts shall be assessed by the line manager of the person concerned together with the Integrity and Compliance Officer; where the person concerned is the Executive Director or the Integrity and Compliance Officer, by the President of the Governing Board; where the person concerned is the President, by the Governing Board without the participation of the President; where the person concerned is another member of the Governing Board, by the Governing Board; and, in respect of members of the Assembly in matters decided by the Assembly, by the Assembly in accordance with Article 21 of the Statute. Measures may include:

1. recusal from the relevant discussion, decision, procedure or supervision;
2. reassignment of tasks or reporting lines;
3. additional oversight or a second approver;
4. divestment or termination of the conflicting activity;
5. exclusion from the procurement or selection procedure, where the conflict cannot be managed otherwise.

A person who has a conflict of interest shall not approve any payment, contract, recruitment, evaluation or decision from which they or a related person could benefit. A member of the Assembly shall not vote on the matters set out in Article 21 of the Statute.

ARTICLE 6**Conflict of interest register**

The Integrity and Compliance Officer shall maintain a register of all declarations and of the measures decided upon. The Governing Board shall review the register annually, and the register shall be made available to auditors and donors on request.

ARTICLE 7**Breaches**

Failure to declare a conflict of interest, or acting despite a conflict of interest, constitutes a disciplinary offence under the Complaints, Investigation and Disciplinary Procedure. Decisions affected by an undeclared conflict may be annulled and the procedure repeated.

ARTICLE 8**Entry into force**

This Policy enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

Annex 1 – Declaration of Interests

Name: _____ **Position / role:** _____

1. Ownership interests or management roles in legal entities that cooperate or may cooperate with CeMI:

2. Other circumstances that could give rise to an actual, potential or perceived conflict of interest:

☐ I have no interests to declare.

I undertake to declare without delay any change in the above information and any conflict of interest that arises in connection with my duties.

Signature: _____ **Date:** _____

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POLICY

RISK MANAGEMENT POLICY



POLICY

Risk Management Policy

Identification, assessment, ownership, mitigation and review of risks at organisational and project level

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI departments, programmes and projects, including activities implemented with partners
Review	Annually

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Purpose

This Policy establishes a systematic approach to managing risks that could prevent CeMI from achieving its mission and project results, or that could cause harm to people, funds, data or CeMI's reputation. It provides for clearly designated risk owners, a standard method for assessing risks and a regular cycle for reviewing mitigating actions.

ARTICLE 2

Principles

Risk management at CeMI is: integrated into planning, project design and decision-making; proportionate to the size and complexity of each activity; documented in risk registers; owned by named individuals; reviewed regularly; and transparent towards the Governing Board and donors.

ARTICLE 3

Risk categories

CeMI shall consider, as a minimum, the following risk categories:

Category	Examples
Delivery	delays, failure to recruit or deploy observers, dependence on key staff, partner under-performance
Safeguarding	SEAH, bullying and harassment, harm to observers, participants, children or adults at risk
Fraud and corruption	misuse of funds, falsified documents, procurement collusion, aid diversion
Financial	funding gaps, cash-flow shortfalls, currency losses, ineligible costs
Political and contextual	political pressure, hostility towards civil society, electoral tensions, legal changes
Security and duty of care	physical threats, travel and road safety, lone working, public health emergencies
Reputational	disinformation campaigns, perceived partisanship, errors in published findings
Information and data	data breaches, cyber-attacks, loss of data, unlawful processing

Category	Examples
Legal and compliance	breaches of law, grant conditions or donor rules

CHAPTER II – ROLES AND RESPONSIBILITIES

ARTICLE 4

Governing Board

The Governing Board shall approve this Policy and review the Organisational Risk Register at least twice a year, and shall be informed without delay of any critical risk or serious incident.

ARTICLE 5

Executive Director and Collegium

The Executive Director is responsible for the overall risk management framework and is the owner of the Organisational Risk Register. The Collegium shall review key risks monthly, as part of its regular meetings, and the full Organisational Risk Register quarterly.

ARTICLE 6

Risk owners

Each risk in a register shall be assigned to a named risk owner – the person best placed to manage that risk.

ARTICLE 7

All personnel

All personnel shall identify risks and incidents and report them to their manager without delay.

CHAPTER III – PROCESS

ARTICLE 8

Risk registers

CeMI shall maintain:

1. an Organisational Risk Register, owned by the Executive Director;
2. a Project Risk Register for each project, prepared at the proposal stage, finalised at the start of the project and owned by the Programme Coordinator or Project Manager.

Each register shall record, for each risk: its description and cause; category; likelihood and impact, each rated on a scale of 1 to 5; overall rating (likelihood × impact); risk owner; existing controls; additional mitigating actions with deadlines; residual rating; and date of last review.

ARTICLE 9

Review cycle

1. Project Risk Registers shall be reviewed monthly by the project team and quarterly together with the Head of Department, and shall be updated before each donor report.
2. The Organisational Risk Register shall be reviewed quarterly by the Collegium and twice a year by the Governing Board.
3. Registers shall also be reviewed whenever a significant change or incident occurs, such as the calling of elections, a security incident or a change in the political context.

4. Lessons learned from incidents, audits, investigations and evaluations shall be reflected in the registers.

ARTICLE 10

Reporting to donors

Project risks and mitigating actions shall be reported to donors as required by the relevant grant agreement. Materialised risks that significantly affect delivery, and any safeguarding, fraud or data incident, shall be reported to the donor in accordance with the Safeguarding Policy, the Anti-Fraud, Anti-Bribery and Anti-Corruption Policy and the Data Protection and Information Security Policy.

ARTICLE 11

Business continuity

CeMI shall maintain basic business continuity arrangements – deputising arrangements for key roles, off-site cloud backups of financial and project data, and alternative working arrangements – to ensure that critical activities, such as election-day observation, can continue in the event of disruption.

ARTICLE 12

Entry into force

This Policy enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

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POLICY

**PARTNER DUE DILIGENCE AND
DOWNSTREAM PARTNER MANAGEMENT
POLICY**



POLICY

Partner Due Diligence and Downstream Partner Management Policy

Transparent and documented selection, assessment, contracting, monitoring and capacity-strengthening of implementing partners and sub-grantees

Adopted by	Governing Board of CeMI, February 2026
Applies to	All implementing partners, co-applicants, sub-grantees and other organisations that receive CeMI or donor funds to implement activities in Montenegro
Review	Annually

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Purpose

CeMI is accountable to its donors for the funds it passes on to partners and sub-grantees. This Policy ensures that downstream partners are selected through a transparent and documented process, that risks are identified and managed, and that CeMI's and donors' standards on safeguarding, fraud prevention, counter-terrorist financing, data protection and value for money flow down to every level of delivery.

Where a donor applies different or stricter rules, those rules shall prevail over this Policy for the project concerned.

ARTICLE 2

Principles

CeMI's partnerships are based on: transparency and equal treatment of applicants; due diligence proportionate to the amount and risk involved; mutual accountability; respect for the independence of civil society partners; and a commitment to strengthening partners' capacity rather than merely assessing it.

CHAPTER II – SELECTION AND ASSESSMENT

ARTICLE 3

Selection of partners

1. Partners shall be selected through a call for proposals or, where justified by expertise, prior cooperation, geographical presence or donor requirements, through direct selection approved in writing by the Executive Director, with the reasons recorded.
2. Sub-grants shall be awarded through a published call or through a restricted call addressed to pre-identified organisations with demonstrated expertise in the areas concerned. In either case, the procedure shall include pre-defined eligibility and award criteria, an evaluation committee of at least three members, a written evaluation report and publication of the results. Where this Article is not consistent with the rules of the donor, or where the project of which the sub-granting scheme forms an integral part provides otherwise, the donor's rules or the provisions of that project shall prevail.
3. All members of selection and evaluation committees shall sign a declaration of no conflict of interest in accordance with the Conflict of Interest Policy.

ARTICLE 4**Due diligence assessment**

Before any agreement is signed, CeMI shall complete a Partner Due Diligence Assessment (Annex 1), proportionate to the level of risk:

Tier	Criteria	Minimum requirements
Tier 1 – Light	Sub-grant or partner budget up to EUR 10,000, low-risk activities	Registration documents, sanctions screening, signed declarations on safeguarding, anti-fraud and conflict of interest, bank account confirmation
Tier 2 – Standard	EUR 10,001–60,000, or contact with children or adults at risk	Tier 1 plus: latest financial statements, key policies (or a commitment to adopt CeMI's policies), interview with management, references
Tier 3 – Enhanced	Above EUR 60,000, a high-risk context, or a first-time partner in a complex project	Tier 2 plus: audit report, assessment of financial management and procurement systems, safeguarding capacity assessment, on-site visit

ARTICLE 5**Assessment areas**

In line with donor due diligence frameworks, the assessment shall cover:

1. Governance and internal control – legal registration, statute, governing bodies, organisational structure and internal controls;
2. Ability to deliver – experience, technical capacity, staffing and track record with donors;
3. Financial stability and management – financial statements, audits, accounting system, segregation of duties, bank accounts and procurement procedures;
4. Downstream delivery – how the partner selects and monitors its own sub-partners, if any;
5. Safeguarding – policy, code of conduct, reporting mechanism, safer recruitment and focal point;
6. Fraud, corruption and counter-terrorist financing – policies, controls and screening (in accordance with the Counter-Terrorist Financing, Anti-Money Laundering and Sanctions Compliance Policy);
7. Data protection – ability to process personal data lawfully and securely;
8. Ethical standards – respect for labour rights, absence of forced labour, child labour, human trafficking and modern slavery, and environmental responsibility.

ARTICLE 6**Decision and risk rating**

The assessment shall result in an overall risk rating (low, medium or high) and, where necessary, a capacity-strengthening and risk mitigation plan. The Executive Director shall decide whether to proceed on the basis of the assessment. A partner may be engaged subject to conditions, such as smaller instalments, more frequent reporting, direct payment of certain costs or prior approval of procurement. High-risk partnerships shall require the additional approval of the President of the Governing Board.

CHAPTER III – CONTRACTING AND MONITORING**ARTICLE 7****Partnership and sub-grant agreements**

Every agreement shall be concluded in writing and shall include, as a minimum: the scope, budget and eligible costs;

a payment schedule linked to reporting; narrative and financial reporting requirements; record-keeping and audit-access rights for CeMI, the donor and their auditors; and clauses on safeguarding and SEAH, anti-fraud and anti-corruption, counter-terrorist financing and sanctions, conflict of interest, data protection, visibility, intellectual property, the flow-down of obligations to the partner's own subcontractors, incident reporting within 24 hours of becoming aware of an incident, suspension and termination for breach, and recovery of funds.

ARTICLE 8

Payments

Funds shall be paid in instalments to a bank account held in the partner's name.

ARTICLE 9

Monitoring

CeMI shall monitor partners in proportion to their risk rating by means of: review of narrative and financial reports and supporting documents; at least one monitoring visit during the project for Tier 2 and Tier 3 partners; spot checks of expenditure; regular coordination meetings; and follow-up of the capacity-strengthening plan. Monitoring results shall be documented.

ARTICLE 10

Partner incidents

Partners shall report to CeMI, within 24 hours, any safeguarding concern, suspected fraud or corruption, sanctions breach or data breach connected with the project. CeMI shall handle such reports in accordance with the Safeguarding Policy, the Whistleblowing Policy, the Anti-Fraud, Anti-Bribery and Anti-Corruption Policy and the Data Protection and Information Security Policy, shall inform the donor, and may suspend payments pending the outcome.

ARTICLE 11

Capacity strengthening

CeMI shall support partners in developing or improving their policies and systems, including by sharing CeMI's templates and policies, through joint training on safeguarding and financial management, and through mentoring.

ARTICLE 12

Close-out and evaluation

At the end of the agreement, CeMI shall verify the final report, reconcile all funds, recover any unspent or ineligible amounts and record an evaluation of the partner's performance, which shall be taken into account in future selection procedures.

CHAPTER IV – FINAL PROVISIONS

ARTICLE 13

Records

All due diligence assessments, decisions, agreements, monitoring reports and evaluations shall be kept in the partner file for at least seven years after project closure, or longer where required by the donor.

ARTICLE 14**Entry into force**

This Policy enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

Annex 1 – Partner Due Diligence Checklist

#	Area	Evidence / question	Tier	Result (✓ / ✗ / N/A) and comments
1	Legal status	Registration certificate, statute, list of governing body members	1–3	
2	Sanctions screening	Organisation, legal representative and key personnel screened (Counter-Terrorist Financing, Anti-Money Laundering and Sanctions Compliance Policy)	1–3	
3	Bank account	Bank confirmation that the account is in the partner's name	1–3	
4	Declarations	Signed declarations on safeguarding, anti-fraud, CTF and conflict of interest	1–3	
5	Financial statements	Last 1–2 years; consistency with the size of the project budget	2–3	
6	Policies	Safeguarding/PSEAH, code of conduct, whistleblowing, anti-fraud, data protection – or a commitment to apply CeMI's policies	2–3	
7	Experience and capacity	Previous projects, donors, references, key staff CVs	2–3	
8	Financial management	Accounting system, segregation of duties, dual authorisation, cash controls	3	
9	Procurement	Written procedures, thresholds, competitive bidding	3	
10	Audit	Latest external audit report and management letter	3	
11	Safeguarding capacity	Focal point, reporting mechanism, safer recruitment, training	2–3	
12	Downstream partners	Own procedures for sub-partners, if applicable	3	
13	Site visit	Findings of the on-site visit	3	
	Overall risk rating	Low / Medium / High		
	Decision	Proceed / Proceed with conditions / Do not proceed		
	Mitigation / capacity plan			

Assessed by: _____ Date: _____

Approved by (Executive Director): _____

13

POLICY

DATA PROTECTION AND INFORMATION SECURITY POLICY



POLICY

Data Protection and Information Security Policy

Lawful, fair and secure processing of personal data of staff, observers, survey respondents, programme participants and partners

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI personnel and associated persons, partners and processors handling personal data on behalf of CeMI, and all CeMI information systems
Review	Annually

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Purpose and legal framework

CeMI processes the personal data of staff, observers, survey respondents, programme participants, partners and members of the public. This Policy ensures that such data is processed lawfully and securely in accordance with the Law on Personal Data Protection of Montenegro and, where applicable, the EU General Data Protection Regulation (GDPR) and the UK GDPR, as well as with the data protection clauses of grant agreements.

ARTICLE 2

Principles

Personal data shall be:

1. processed lawfully, fairly and transparently;
2. collected for specified, explicit and legitimate purposes and not further processed for incompatible purposes;
3. adequate, relevant and limited to what is necessary (data minimisation);
4. accurate and kept up to date;
5. kept for no longer than necessary, in accordance with the retention periods laid down in Article 41 of the Rulebook on Financial Operations and Procurement and in this Policy;
6. protected by appropriate technical and organisational security measures (integrity and confidentiality);
7. handled in such a way that CeMI is able to demonstrate compliance (accountability).

CHAPTER II – PROCESSING OF PERSONAL DATA

ARTICLE 3

Lawful basis and consent

CeMI shall process personal data only where there is a lawful basis, such as consent, the performance of a contract, a legal obligation or a legitimate interest that is not overridden by the rights of the data subject. Consent shall be freely given, informed, specific and documented, and may be withdrawn at any time.

For children, consent shall be given by a parent or guardian.

ARTICLE 4**Special categories of data**

Data revealing political opinions, ethnic origin, religious beliefs, health, sex life or sexual orientation, and data relating to survivors of abuse, shall be processed only where strictly necessary, on the basis of explicit consent or another specific legal basis, and subject to enhanced security measures.

Data relating to criminal proceedings and convictions shall be processed only where permitted by law, for the roles referred to in Article 11 of the Safeguarding Policy and Article 8 of the Rulebook on Employment and Other Types of Work Engagement, and never on the basis of consent alone.

Public opinion research and survey data shall be anonymised or pseudonymised at the earliest possible stage, and published results shall never allow individual respondents to be identified.

ARTICLE 5**Election observation data**

Personal data of observers shall be used only for the purposes of recruitment, accreditation, training, deployment, payment and communication. Observation reports shall be processed through CeMI's secure reporting system. Personal data of voters, polling board members or other individuals observed shall not be collected unless this is strictly necessary and lawful.

ARTICLE 6**Rights of data subjects**

CeMI shall respect the rights of data subjects to information, access, rectification, erasure, restriction of processing, objection and data portability, as provided by law.

ARTICLE 7**Processors and transfers**

Third parties that process personal data on CeMI's behalf, such as IT providers, survey agencies and partners, shall sign a data processing agreement containing appropriate confidentiality and security obligations. Personal data shall be transferred outside Montenegro only in accordance with the law and subject to appropriate safeguards.

CHAPTER III – INFORMATION SECURITY

ARTICLE 8**Access control**

Access to systems and data shall be granted on a need-to-know basis and revoked immediately when it is no longer needed or when the person concerned leaves CeMI. Each user shall have an individual account; the sharing of passwords is prohibited. Strong passwords and multi-factor authentication shall be used for e-mail, cloud storage, the accounting system and backups.

ARTICLE 9**Devices and storage**

1. CeMI data shall be stored in CeMI-approved systems and cloud services, and not in personal accounts.
2. Laptops and mobile devices used for CeMI work shall be protected by a password or PIN, encryption where available, up-to-date software and antivirus protection.

3. Sensitive files – personnel files, payroll records, safeguarding and investigation files, and whistleblowing reports – shall be stored in restricted-access folders or locked cabinets accessible only to authorised persons.
4. Daily and weekly backups shall be performed in accordance with Articles 7 and 8 of the Rulebook on Financial Operations and Procurement.

ARTICLE 10

Confidential information

Safeguarding, whistleblowing and investigation records shall be accessible only to the persons handling the case. They shall never be stored in shared general folders or sent to third parties by unencrypted e-mail.

ARTICLE 11

Retention and destruction

Personal data shall be retained only for the periods required by law, donor agreements and Article 41 of the Rulebook on Financial Operations and Procurement. Unless a longer period applies: application data of unsuccessful observer candidates shall be kept for one year; safeguarding, whistleblowing and investigation files shall be kept for at least seven years after the case is closed; and raw survey data containing personal identifiers shall be anonymised or deleted once the research has been completed. Data shall be destroyed securely.

CHAPTER IV – BREACHES AND ACCOUNTABILITY

ARTICLE 12

Personal data breaches

Any actual or suspected loss, theft, unauthorised access to or disclosure of personal data, including the loss of a device, shall be reported immediately to the Data Protection Officer, who is designated by written decision of the Executive Director in accordance with the Law on Personal Data Protection and Article 18a of the Rules of Procedure. The Data Protection Officer shall assess the breach, take containment measures and, where required by law, notify the competent supervisory authority (in Montenegro, the Agency for Personal Data Protection and Free Access to Information) and the affected individuals without undue delay. Where the GDPR or a grant agreement applies, notification shall be made within 72 hours of CeMI becoming aware of the breach. Breaches affecting donor-funded projects shall be reported to the donor in accordance with the grant agreement.

ARTICLE 13

Breaches of this Policy

Breaches of this Policy constitute disciplinary offences under the Complaints, Investigation and Disciplinary Procedure.

ARTICLE 14

Entry into force

This Policy enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

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POLICY

HUMAN RESOURCES POLICY



POLICY

Human Resources Policy

Fair, safe and lawful management of people at CeMI – from recruitment to the end of engagement

Adopted by	Governing Board of CeMI, February 2026
Applies to	All CeMI employees; the provisions on equal opportunities, conduct, well-being, data and duty of care also apply to interns, scholarship holders, volunteers, experts, consultants and election observers
Review	Every two years, or earlier following a change in labour legislation

CHAPTER I – GENERAL PROVISIONS

ARTICLE 1

Purpose

This Policy sets out the principles and rules by which CeMI recruits, engages, remunerates, develops and protects its people and, where necessary, ends their engagement. It is the Human Resources Policy referred to in Article 25 of the Rulebook on Financial Operations and Procurement.

ARTICLE 2

Legal framework

This Policy shall be applied in accordance with the Labour Law of Montenegro, the Law on Prohibition of Discrimination, the Law on Prohibition of Harassment at Work, the Law on Occupational Safety and Health, the Law on Personal Data Protection and other applicable regulations. Where the law or an employment contract provides for rights more favourable to an employee than this Policy, the law or the contract shall prevail.

ARTICLE 3

Principles

The management of people at CeMI is based on the following principles: merit and transparency; equal opportunities and non-discrimination; safeguarding and the safety of every person; fair pay; respect for work-life balance; continuous learning; confidentiality of personal data; and the accountability of managers.

CHAPTER II – EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

ARTICLE 4

Equal opportunities

CeMI shall not discriminate in recruitment, pay, training, promotion, working conditions or termination on grounds of sex, gender, ethnicity, nationality, religion, political opinion, disability, age, sexual orientation, gender identity, marital or family status, pregnancy or any other personal characteristic.

CeMI shall actively encourage applications from under-represented groups, strive for gender balance in teams and selection committees, and provide reasonable adjustments for persons with disabilities in recruitment and at work.

ARTICLE 5**Harassment and bullying**

All forms of harassment, bullying, harassment at work (mobbing) and sexual harassment are prohibited and shall be dealt with under the Safeguarding Policy, the SEAH Rulebook and the Complaints, Investigation and Disciplinary Procedure, without prejudice to the protection available under the Law on Prohibition of Harassment at Work.

CHAPTER III – RECRUITMENT AND ENGAGEMENT**ARTICLE 6****Recruitment**

Recruitment and selection shall be carried out in accordance with the Rulebook on Employment and Other Types of Work Engagement (employment planning, public and internal calls, the Selection Committee, recusal in cases of conflict of interest, proof of conditions) and with the safer recruitment measures set out in Article 11 of the Safeguarding Policy.

Every position shall have a written job description setting out its main tasks, required qualifications, reporting line and safeguarding risk level.

ARTICLE 7**Types of engagement**

CeMI engages people through:

1. employment contracts for an indefinite or a fixed term, in accordance with the Labour Law;
2. contracts for services and author's contracts for experts and consultants;
3. contracts with interns and scholarship holders;
4. volunteer agreements, in accordance with the law governing volunteer work;
5. engagement agreements with election observers.

Each engagement shall be documented in writing before work begins and shall set out the tasks, duration, remuneration and working arrangements, as well as the obligation to comply with the Code of Conduct and CeMI's policies.

ARTICLE 8**Probation**

An employment contract may provide for a probationary period within the limits laid down by the Labour Law. Before the end of the probationary period, the line manager shall assess the employee's performance in writing, and the Executive Director shall decide on the outcome of the probationary period.

ARTICLE 9**Induction**

Every new employee and associate shall receive an induction during their first month, which includes:

1. an introduction to CeMI's mission, structure and Rules of Procedure;
2. confirmation that the Code of Conduct was signed before work began (Article 11 of the Safeguarding Policy), and the signing of the Declaration of Interests (Conflict of Interest Policy);
3. mandatory training on safeguarding and SEAH, anti-fraud and data protection;
4. information on reporting channels, health and safety, and IT security;

5. role-specific instructions from the line manager.

CHAPTER IV – WORKING TIME, REST AND LEAVE

ARTICLE 10

Working hours

Full-time working hours are 40 hours per week. CeMI's regular working hours are from 8 am to 4 pm on working days, as laid down in Article 28 of the Rules of Procedure.

ARTICLE 11

Flexible and remote work

Where the nature of the work allows, the Executive Director may approve flexible working hours or work from home on a temporary or regular basis. Remote work is subject to the same obligations regarding availability, data protection and information security (Data Protection and Information Security Policy) as work in the office.

ARTICLE 12

Overtime and field work

Work beyond full-time hours may be ordered only where necessary, such as on election day or around major events, and in accordance with the Labour Law. Overtime shall be recorded in timesheets and compensated in accordance with the Labour Law and the employment contract, either by payment or by equivalent time off. Line managers shall plan work so that no one is overworked, in accordance with Article 28 of the Rules of Procedure.

ARTICLE 13

Breaks and rest

Employees are entitled to a daily break of 30 minutes, daily rest between two working days and weekly rest of at least 24 consecutive hours, in accordance with Article 26 of the Rulebook on Financial Operations and Procurement and the Labour Law.

ARTICLE 14

Annual leave

Employees are entitled to paid annual leave of no less than the minimum provided for by the Labour Law, increased in accordance with the criteria set out in the employment contract (such as length of service and working conditions).

Annual leave shall be planned by the line manager in consultation with employees. The Executive Director shall adopt a Decision on Annual Leave each year. Leave requests shall be submitted in writing at least 10 working days in advance and shall be approved by the line manager. Leave during election periods and other key project phases may be restricted, provided that the statutory minimum is always guaranteed.

ARTICLE 15

Paid and unpaid leave

Employees are entitled to paid leave in the cases provided for by the Labour Law and the employment contract, including marriage, the birth of a child, the serious illness or death of a close family member, and sitting a professional examination.

Unpaid leave may be granted by the Executive Director at the employee's request, in accordance with the Labour Law and Article 25 of the Rulebook on Financial Operations and Procurement.

ARTICLE 16**Sick leave, maternity and parental leave**

Sick leave, maternity leave and parental leave shall be granted in accordance with the law. Employees shall inform their line manager of an absence due to illness on the first day of absence and shall submit a medical certificate as required by law.

CeMI supports employees with family responsibilities, including through flexible arrangements after parental leave, and shall protect employees from any detriment connected with pregnancy, maternity leave or parental leave.

ARTICLE 17**Public holidays**

Employees are entitled to paid leave on public and religious holidays in accordance with the law. The Executive Director shall adopt a Decision on Non-Working Days during Public and Religious Holidays.

ARTICLE 18**Timesheets**

All employees shall record their working time in timesheets in accordance with Articles 16 and 17 of the Rulebook on Financial Operations and Procurement. Timesheets shall accurately reflect working hours, leave, absences and the projects on which time was spent, and shall be approved by the line manager.

CHAPTER V – PAY AND BENEFITS

ARTICLE 19**Salaries**

The salary of each employee shall be determined in the employment contract, taking into account the complexity of the position, the required qualifications, the level of responsibility and the available budget. CeMI aims to ensure internally consistent and fair pay for comparable positions, irrespective of the source of funding for the position.

Salaries shall be paid in accordance with Articles 16 and 17 of the Rulebook on Financial Operations and Procurement and Article 28 of the Rules of Procedure. Salary information shall be processed confidentially by the persons responsible for payroll, without prejudice to employees' rights under labour and anti-discrimination legislation.

ARTICLE 20**Rewards and benefits**

Performance rewards may be granted in accordance with Article 27 of the Rules of Procedure. Travel expenses and allowances shall be reimbursed in accordance with Articles 42–47 of the Rulebook on Financial Operations and Procurement. CeMI shall pay all mandatory social security and pension contributions.

CHAPTER VI – PERFORMANCE AND DEVELOPMENT

ARTICLE 21**Work planning and reporting**

Employees shall submit monthly work reports in accordance with Article 23 of the Rules of Procedure. Line managers shall agree work objectives with each employee at the beginning of each year or project.

ARTICLE 22**Annual performance review**

Each employee shall have an annual performance review with their line manager covering the achievement of objectives, competences, conduct consistent with CeMI's values and policies, and development needs. The review shall be documented, signed by both parties and kept in the personnel file.

ARTICLE 23**Learning and development**

CeMI shall prepare an annual training plan, within the resources available, which includes mandatory training (safeguarding and SEAH, anti-fraud, data protection, health and safety) and professional development based on the needs identified in performance reviews. Attendance at training shall be recorded.

CHAPTER VII – HEALTH, SAFETY, WELL-BEING AND DUTY OF CARE

ARTICLE 24**Occupational safety and health**

CeMI shall provide a safe working environment and appropriate working conditions, as required by Article 28 of the Rules of Procedure and the Law on Occupational Safety and Health, including a workplace risk assessment and safety information for employees.

ARTICLE 25**Duty of care in the field**

For field activities, travel and election observation, CeMI shall apply the security and duty-of-care measures set out in Article 13 of the Safeguarding Policy and in the Risk Management Policy, including safety briefings, communication protocols, the avoidance of lone working at night, incident reporting and, where appropriate, insurance.

ARTICLE 26**Well-being**

CeMI promotes a healthy work-life balance and mental well-being. Employees who experience stress, harassment or a traumatic event in connection with their work – including during election observation or work with survivors – may request support from their line manager or the Safeguarding Focal Point, who shall facilitate access to appropriate professional support.

CHAPTER VIII – CONDUCT, GRIEVANCES AND DISCIPLINE

ARTICLE 27**Conduct**

All employees shall comply with the Code of Conduct and CeMI's policies.

ARTICLE 28**Grievances and discipline**

Employee grievances, complaints of misconduct and disciplinary matters shall be handled in accordance with the Complaints, Investigation and Disciplinary Procedure and Articles 25 and 26 of the Rules of Procedure, in compliance with the Labour Law.

CHAPTER IX – PERSONNEL RECORDS

ARTICLE 29

Personnel files

CeMI shall keep a personnel file for each employee containing the employment contract and any amendments to it, the job description, documents proving that the conditions for employment are met, performance reviews, training records and decisions concerning the employee. Personnel files shall be kept confidential, with restricted access, in accordance with the Data Protection and Information Security Policy, and shall be retained in accordance with Article 41 of the Rulebook on Financial Operations and Procurement.

Safeguarding and investigation files shall be kept separately.

Employees are entitled to access their personnel file and to request the correction of inaccurate data.

CHAPTER X – END OF ENGAGEMENT

ARTICLE 30

Termination

An employment contract may end by mutual agreement, resignation, expiry of the fixed term or termination by CeMI, in the cases provided for, and in accordance with the procedures and notice periods laid down, by the Labour Law and the employment contract.

ARTICLE 31

Leaving CeMI

Before leaving, the employee shall hand over their work and documentation and return all CeMI property; their access to CeMI systems and premises shall be removed on their last working day. The employee shall be offered an exit interview, and the feedback shall be used to improve CeMI's practices.

ARTICLE 32

References

CeMI shall provide references based on facts recorded in the personnel file. Where a prospective employer asks whether a former employee was the subject of any substantiated finding of sexual exploitation, abuse or harassment, CeMI shall provide truthful information to the extent permitted by law.

CHAPTER XI – FINAL PROVISIONS

ARTICLE 33

Implementation

The Executive Director and the President of the Governing Board are responsible for implementing this Policy and may adopt more detailed instructions and forms (such as leave request and performance review forms).

ARTICLE 34

Entry into force

This Policy enters into force on the day of its adoption by the Governing Board.

Podgorica, February 2026

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RULEBOOK (SEAH RULEBOOK)

RULEBOOK ON PROTECTION FROM SEXUAL EXPLOITATION, SEXUAL ABUSE AND SEXUAL HARASSMENT



RULEBOOK (SEAH RULEBOOK)

Rulebook on Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment

Adopted in Podgorica, 20 April 2022

Pursuant to the provisions of the Statute of the NGO Centre for Monitoring and Research (hereinafter: CeMI) on the competence of the Governing Board to adopt general acts, the Governing Board of CeMI (hereinafter: the GB) hereby adopts the Rulebook on Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment.

ARTICLE 1

General provision

The Rulebook on Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment (hereinafter: the Rulebook) is an internal act of CeMI which governs the prevention of, and protection from, sexual exploitation, sexual abuse and sexual harassment (hereinafter: SEAH).

This Rulebook shall not be amended without fifteen days' prior notice. All amendments to the Rulebook shall be approved by the GB.

ARTICLE 2

Purpose of the Rulebook

The purpose of this Rulebook is to mitigate and prevent the risk of SEAH within CeMI and to provide mechanisms for protection from SEAH to persons engaged by CeMI, persons engaged in partner organisations or institutions, and other persons engaged on projects implemented by CeMI.

ARTICLE 3

Scope

This Rulebook applies to all persons engaged by CeMI, persons engaged in partner organisations or institutions, and other persons engaged on projects implemented by CeMI.

All contracts and partnership agreements concluded by CeMI shall include a standard clause requiring associates, contractors, implementers, consultants and partners' subcontractors to commit to a zero-tolerance policy on SEAH and to take measures to prevent and respond to SEAH.

Where the persons referred to in paragraphs 1 and 2 of this Article fail to take measures to prevent SEAH, fail to investigate allegations of SEAH or fail to take corrective action where SEAH has occurred, such failure shall constitute grounds for the termination of any cooperation agreement.

ARTICLE 4

Core principles

Every employee is entitled to a working environment free from any offensive behaviour, whether of a sexual or of any other nature.

CeMI shall promote relationships of mutual respect based on the recognition of human rights and dignity. A positive and respectful professional atmosphere between staff and partners, founded on these principles, is the best starting point for mitigating the risk of misconduct such as sexual exploitation, sexual abuse and sexual harassment.

Procedures for dealing with cases of SEAH shall give priority to the rights, needs and wishes of the victim, while ensuring procedural fairness for all parties.

CeMI shall inform all employees and partners of the SEAH policy.

CeMI shall treat all reported incidents and complaints seriously and shall promptly investigate all allegations of SEAH. No person shall be discriminated against or suffer any adverse consequences for reporting SEAH.

CeMI shall take measures to protect employees from false reports of SEAH.

CeMI shall support awareness-raising and capacity-building activities aimed at preventing and mitigating SEAH and remedying its consequences.

CeMI shall promote and support the empowerment of partners and their members in order to mitigate and prevent the risk of SEAH. This includes supporting partners in developing their own SEAH protection policies and supporting the development of training programmes on gender equality and anti-discrimination.

ARTICLE 5

Obligations and responsibilities of employees

CeMI is committed to a policy of zero tolerance of all forms of exploitation, abuse and harassment. All CeMI employees shall:

- refrain from any conduct that constitutes SEAH;
- report without delay, through the Legal Department as the Safeguarding Focal Point or directly to the Responsible Person, any knowledge or suspicion of SEAH committed against an employee, or against a child or adult involved in CeMI's programmes, by one or more of the persons referred to in Article 3, paragraphs 1 and 2 of this Rulebook;
- take all appropriate measures to prevent SEAH being committed against any person by their colleagues or by any other person involved in CeMI's programmes.

ARTICLE 6

Responsible Person

The person responsible for receiving and acting upon reports of SEAH and for initiating investigations to establish responsibility for SEAH (hereinafter: the Responsible Person) is the Executive Director. Reports shall be received through the Legal Department, which acts as the Safeguarding Focal Point under the Safeguarding Policy and supports the Responsible Person.

Where a report concerns the Executive Director or the Head of the Legal Department, it may be submitted directly to the Board Safeguarding Lead, who shall perform the duties of the Responsible Person and inform the GB of the results of the investigation; in that case, the GB shall take the decision, and any decision on the dismissal of the Executive Director shall be taken by the Assembly. Where the Executive Director is otherwise unable to carry out the actions referred to in paragraph 1 of this Article, or where the post of Executive Director is vacant, those duties shall be performed by the Head of the Legal Department; in that case, reports concerning the Head of the Legal Department shall be submitted to the Board Safeguarding Lead, and decisions on measures shall be taken by the GB without the participation of the President.

Where a report concerns the President of the Governing Board, the GB shall deal with it without the participation of the President, and any decision on dismissal shall be taken by the Assembly, in accordance with Articles 32 and 33 of the Statute.

The Responsible Person shall treat every report seriously and shall not publicly disclose its details, but shall protect them in accordance with the Law on Personal Data Protection of Montenegro.

Where the Responsible Person establishes that the reported incident contains elements of a criminal offence, they shall refer the matter without delay to the competent investigative authorities.

ARTICLE 7**Reporting and procedure following a report**

Persons reporting SEAH or a suspicion of SEAH shall do so in good faith and shall provide, where possible, any information or evidence in their possession that would substantiate the allegation that SEAH has occurred.

Reports are submitted orally, in writing or by e-mail to the Legal Department, as the Safeguarding Focal Point, which shall forward them without delay to the Responsible Person.

A report should contain the name of the person or persons alleged or suspected to have committed SEAH, the date of the incident, if known, and a brief description of the incident.

A report may also be submitted anonymously.

Upon receipt of a report, the Responsible Person shall assess it and, within the time limit laid down in Article 6 of the Complaints, Investigation and Disciplinary Procedure, decide whether to initiate an investigation procedure to establish whether SEAH has occurred.

The investigation procedure to establish SEAH shall be urgent and survivor-centred. Immediately upon receipt of the report, the Responsible Person, with the support of the Safeguarding Focal Point, shall carry out an individual assessment of the victim's needs. Where necessary, the victim shall be referred to organisations or institutions primarily engaged in the protection of, and assistance to, victims of SEAH.

Upon completion of the investigation procedure, the Responsible Person shall decide whether the person concerned is responsible for SEAH, shall decide on measures in accordance with Article 25 of the Rules of Procedure, and shall take other actions to prevent and mitigate SEAH and remedy its consequences.

ARTICLE 8**Protection of victims, whistleblowers and witnesses**

Every victim who reports, attempts to report, or is believed to have reported or to be about to report a suspicion of SEAH or an actual event constituting SEAH is entitled to protection (including anonymity, confidentiality and protection from retaliation).

Any other person who reports, attempts to report, or is believed to have reported or to be about to report a suspicion of SEAH or an actual event constituting SEAH, or who cooperates, attempts to cooperate, or is believed to have cooperated or to be about to cooperate with an investigation by the Responsible Person, shall be regarded as a whistleblower or witness and is entitled to appropriate protection (including anonymity, confidentiality and protection from retaliation).

A victim of SEAH is entitled to:

- information and advice on the formal and informal options for reporting SEAH available within and outside CeMI;
- information on available medical services and support;
- information on available health insurance options and services;
- information about, and referral to, external services specialising in assisting and supporting victims of SEAH;
- support and guidance on how to report to, and what to expect from, the local authorities, particularly where the alleged conduct constitutes a criminal offence.
- The Responsible Person shall provide the requested information to the victim of SEAH within three working days of the request.

ARTICLE 9**Sanctions**

SEAH, or retaliation against an actual or suspected victim of SEAH or against a whistleblower or witness of SEAH, committed by a person engaged by CeMI shall be sanctioned as the most serious violation of CeMI's principles, in accordance with Article 25 of CeMI's Rules of Procedure and the Complaints, Investigation and Disciplinary Procedure.

The sanction referred to in paragraph 1 of this Article shall also apply to a person engaged by CeMI who is found to have knowingly made a false report of SEAH.

ARTICLE 10**Legal remedy**

A person against whom a decision has been made establishing responsibility for SEAH or for a false report of SEAH is entitled to appeal in accordance with Article 26 of CeMI's Rules of Procedure.

ARTICLE 11**Final provision**

This Rulebook shall enter into force on the day of its adoption.

Podgorica, April 2022



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