

Event Policy

One Albania SHA
Version 1.0



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1. PREAMBLE

The term “Event” used to refer to a particularly spectacular performance or activity, but today the term can equate to events of every kind. Nowadays, the spectrum of events ranges from business meetings to meticulously planned shows that combine information, emotion, action and motivation. Successfully implemented events allow us to experience corporate culture and the capabilities of our Company and to connect on a personal and interactive level. They are an important part of our communication concept and marketing mix, the tangible execution of our strategic direction.

Although events often fulfill the requirement for uniqueness and an individual concept, they must also adhere to certain policies. This contrast places the highest of demands on all parties and through the diversity and nature of our company, it is important to create a unified framework for all staff in order to follow a common understanding. The Event Policy sets out to define this framework.

2. PURPOSE OF THIS POLICY

This policy aspires to set clear criteria for the planning, implementation and follow up work for events. It is intended to be a strategic umbrella for event management and should serve as the policy for event-related issues.

Corporate Affairs Department, and/or Marketing Communication Department, and/or Human Resources Group organize events addressed to internal and external target groups, in close cooperation with the Requesting Function (Event Initiator), as well as other relevant departments taking into consideration the internal policies applicable (e.g., Procurement Policy).

As part of their ordinary work, many employees will be tasked with planning and organizing events within their department and will take on the role of Event Project Manager or Event Initiator. These roles include a wide range of very specific responsibilities. These guidelines aim to clearly define these responsibilities and roles, and, through widespread standardization, to ensure that those involved can act with confidence.

3. ADDRESSES AND SCOPE OF THIS POLICY

Work related meetings provided by the law, don't fall within the scope of this Policy.

This Policy describes the scope and requirements for all people and departments who are directly involved in planning, implementing and following up on an event. The Policy applies regardless of whether the person in question the Event Initiator or the Event Project Manager is, and regardless of the status of that employee. It harmonizes with the values of the Guiding Principles and with the Code of Ethical Conduct.

In addition, the following policies, laws and regulations must be observed:

- ❖ ONE Albania Anti-Fraud Policy;
- ❖ ONE Albania Policy on Accepting and Granting of Benefits;
- ❖ ONE Albania Policy on Sponsorships;
- ❖ ONE Albania Policy on Donations;
- ❖ ONE Albania Procurement Policy;
- ❖ ONE Albania Policy on Avoiding Corruption and Other Conflicts of Interest.

These and all other policies listed can be found in the Intranet site.

4. ADAPTATION OF THIS POLICY

The application of the Policy is in line with the Albanian legislation as well as the cultural customs and the co-determination rights of employees' representatives.

5. DEFINING THE TERMS AND DIFFERENTIATING THE SCOPE AND CONTENT OF THE POLICY

If this Policy is violated, this can result in liability risks for the Company and its executive bodies. Violation of this Policy may thus entail labor and disciplinary law consequences and, where applicable, even criminal law consequences. In individual cases, a violation may also result in additional civil lawsuits, such as the assertion of damage claims.

5.1 Defining and Categorizing Events

In principle, an event is an organized one-off occasion with a limited time frame in which a group of people (see 6.2 Target groups of events) take part. The purpose of an event can be found within the goals that are set out in 6) event objectives.

Clearly defined goals are a crucial prerequisite for planning and carrying out successful events. The objective and nature of the communication determine the different event formats.

Individual event formats can be summarized in the following event categories:

Event category	Definition	Monetary benefit / incentive share
Work-related	The emphasis of events in this category is primarily on imparting knowledge and information. Depending on the format, they can involve a varying degree of interaction between speakers and participants. This ranges from lectures and press conferences to large, modern group conferences like “Open Space” or “Bar Camps” at which the definition and content of the agenda is delivered by the participants themselves.	No individual benefit for the participant that can be expressed in monetary terms. Participants’ monetary benefit therefore lies at 0% of the events’ costs.
Infotainment	Events in the infotainment category have both a work-related (see above) as well as an entertainment element (incentive share). These are used to achieve more activated and receptive behavior when conveying information. An example is Group or Corporate events in which individual presentations of an overall concept are combined with entertaining elements. In addition to conveying information, these events serve the additional purpose of providing networking opportunities in the form of a “Get Together”. Another example is events for social partners or media representatives, aiming at developing/maintaining trust.	The monetary benefit per participant can range from 1 to 100% depending on the extent of the incentive share per person.

Event category	Definition	Monetary benefit / incentive share
Leisure-based	This category includes events that have the primary goal of entertaining the participants and generating a strong emotional response; for example, incentive trips.	There is a clear individual benefit for the participant, which can be quantified in monetary terms. The monetary benefit accounts for 100% of the event costs per participant.

5.2 Defining incentive scheme (individual benefit for employees)

❖ Incentive schemes

Incentive schemes are an effective management tool in order to convey and promote strategic issues and product priorities, while simultaneously ensuring sales and turnover success.

Competitions are another tool to increase motivation, in addition to the standard bonus system. Competitions are carried out in the company, affiliates and channels to improve results and motivate employees.

Participation incentives can be bonuses that result from competitions.

❖ Incentive / individual benefit

An incentive is a motivational bonus that is awarded for a specific act or when a specific goal is achieved. The incentive can be in the form of money, but it can also be an individual benefit. The latter kind of benefit is particularly relevant at events. For example, taking part in an event at which the participants are offered an entertaining program would offer an individual benefit that can be measured in monetary terms.

5.3 Definition of Events within the Scope of this Policy

The Event Policy differentiates between company events at which the Company acts as the organizer, and events at which the Company is a co-organizer or sponsor.

❖ Company Events

There is a smooth transition between a “simple” meeting to an event in the traditional sense within the “work-related” category. For standardization purposes, events of this category include events in which:

- Organizational and preparation work go beyond a standard “Jour Fixe” (or recurrent regular meeting), for example in the case of a workshop or training measure in one’s own department and Events from the “infotainment” or “leisure-based” categories.

❖ Sponsoring Events

Sponsoring is an element of the communication strategy and marketing mix. Sponsorship refers to the planning, organizing, implementing and controlling all activities that are associated with contributing money or value in kind, or services in sporting, cultural, environmental, scientific, business and social areas, according to the provisions of the Sponsorships Policy.

The sponsorship instrument supports and complements the company’s other communication tools. Numerous services are provided in return which makes sponsoring sport, art, culture, social and other projects interesting for companies.

The sponsorship requests must be forwarded to Corporate Affairs department of the Company and the Compliance & Corporate Governance Department, which must be consulted.

Note: Should any events arise as the result of a sponsoring activity, such events are also subject to this Company Policy and to the Sponsorships Policy.

❖ The Company is a co-organizer or sponsor:

At events in which the company only acts as a co-organizer or sponsor, the extent to which the regulations in the Event Policy are applicable should be checked in each case. Any unclear situations should be clarified by Compliance & Corporate Governance Department.

6. EVENT OBJECTIVES

Clearly defined goals are a crucial prerequisite for planning and carrying out successful events.

The goals should be defined by the Event Initiator at the start of the project and should accompany the entire project process. They are defined with the aid of the Annex and Brief of the event as part of the briefing.

Whether or not an event is the appropriate means of communication and, if it is, which event format is most suitable, should be evaluated based on the defined objectives. After the event, a Report can be made about the success of the event by measuring whether the goals have been reached (evaluation). The lessons learned must be incorporated into the planning of subsequent events or similar formats.

6.1 Planning and Briefing of the Event

To effectively and efficiently implement an event, the Event Initiator must plan it in a structured manner in advance and prepare the relevant Form (Brief) (see 7. Areas of responsibility in organizing events). The Event Initiator must, therefore, deal with the following questions, which produce clearly defined objectives as a result (see 6. Event Objectives).

Question	Answer
Target group and number of members Who will be addressed/ invited?	- Third parties - Company's Employees - Internal Social partners
Objective What is the purpose of the event?	Use of the relevant Form (Event Brief form)
Event format – how the event will be implemented?	Examples of work-related events - Road show without an incentive share - Large group conferences (Open Space, Future Conference, etc.) without an incentive share - Press conference - Bar Camp without an incentive share - Training, Seminar, Workshop Examples of infotainment events - Meeting / conference with an incentive share - Road show with entertainment - Press events with an incentive share - Bar Camp with an incentive share - Team building / Off-site

Question	Answer
	- Award ceremony / Prize - (Product) launch events - Promotion - Exclusive events with a select group of participants Examples of leisure-based events - Company event - Incentive trip - Concert - Trade Fair party - Cultural event - Sponsoring: music, sports, culture
Timeframes	Examples - 4 hours - 2 days - Road show for one day, in X locations over X weeks
Budget	To be calculated in proportion with the objectives and the economic efficiency of holding the event.

Based on this data, an event category can be assigned.

6.2 Target Groups of Events

The target groups of events generally differentiate on the basis of external and internal participants. They should be selected according to the objectives of the event and comply with the Company's business interests.

Target Groups inside the Company	Target Groups outside the Company
- Board of Directors members - CEO/Deputy CEO of the Company - CXO's - HOD's and/or Team Managers/Leaders - Employees	- Customers (business customers, consumers) - Business and cooperation partners - Journalists / media representatives - Shareholders - Public Officials

Target Groups inside the Company	Target Groups outside the Company
Note: In general, events should be designed as not to allow invitations to the companions of participants. Where considered customary and commensurate to the occasion, and in certain kinds of events, invitations may be addressed to partners/companions.	

6.3 Forms (Annex and Brief of The Event)

Like all other communication instruments, events must contribute towards corporate objectives and should bring the brand personality of the Company to life. To do this, the Event Initiator must use the Annex and Brief of the Event, to first identify and determine the event objectives prior to the start of the event.

There is an Annex and Brief of the Event for target groups outside and inside of the Company. It is imperative that every event contributes to a clearly defined set of objectives. These goals are defined as minimum targets, which can be supplemented with additional optional objectives.

The defined objectives form the basis of the development of the event concept, the selection of a suitable event format and ultimately the evaluation of the event. The results of the evaluation must be used to continue developing successful concepts and also to adjust less efficient formats. The Event Initiator must initiate and terminate an evaluation about whether the objective has been reached.

6.4 Evaluation of The Objectives

The evaluation must be included in the documentation of an event and serve as the basis for optimizing future events.

Survey methods:

- Written survey
- Questionnaire in electronic form
- Paper questionnaire
- Personal interview
- Computer Assisted Personal Interviewing

Note: Data protection and anonymity must be guaranteed in all survey methods. All currently applicable laws and regulations must also always be observed.

➤ **Which Events should be evaluated?**

If the event falls in the scope of the Policy, evaluation of a Company event must be based on the Annex and Brief of the Event, according to the provisions in article 5.3.1. If the Company is just the co-organizer or sponsor of an event, the Event Initiator must check to what extent an evaluation is possible – based on the total cost, the objectives and the legal framework.

7. AREAS OF RESPONSABILITIES IN ORGANIZING EVENTS

7.1 Defining the responsibilities of the Event Initiator and the Event Project Manager

Event Initiator (EI)	Event Project Manager (EPM)
The Event Initiator is the employee who submits the request for organizing an event; the one who carries the overall responsibility and often also provides the budget for the event.	The Event Project Manager is the responsible for planning, implementing and following up on events.

Subject	Duties and responsibilities of the Event Initiator (EI)	Duties and responsibilities of the Event Project Manager (EPM)
General		Adhering to the regulations described in the Event Policy.
	Note: If the EI does not abide by the Policy rules, even after receiving such advice from the EPM, the latter can transfer the responsibility to the EI with a written notification referring to the relevant chapter of the up-to-date version of the present Policy. This notification must also be documented.	

Subject	Duties and responsibilities of the Event Initiator (EI)	Duties and responsibilities of the Event Project Manager (EPM)
		Adhering to and implementing the rules of the Policy, in case external service providers and agencies are involved in the event organizing. If an agency takes on parts of the event, the Company's internal EPM carries the ultimate responsibility. Transferring this responsibility to external service providers or agencies is prohibited.
Budget Finance Taxes Purchase	Adhering to the participant-host ratio (see 8.2 participant – host ratio)	Adhering to the given budget framework while taking the purchasing process into account.
		Where possible, use of internal Company resources (e.g., its premises). Synergies that can be achieved through information about events in other Group units and/or through working together with the event divisions are to be given priority. Ensuring that all national tax-relevant data and documents are taken into account prior to the event.

Subject	Duties and responsibilities of the Event Initiator (EI)	Duties and responsibilities of the Event Project Manager (EPM)
Objectives	Providing a comprehensive written Form (briefing). (Annex and Brief of the Event)	Documenting changes to the Form (briefing). Possible additional costs resulting from a change are to be avoided by seeking an appropriate consultation, and, where relevant, are also to be documented (see 6 Event objectives). Clearly defined goals are a crucial prerequisite for planning and carrying out successful events.
	Defining the objectives of the planned event using Annex and Briefing of the Event	
	Initiating the evaluation of the targets set, in case the event is subject to evaluation. (see 6.4.2. Which Events should be evaluated?	
Prior Approval	Involving the Compliance & Corporate Governance Department timely with regard to compliance-relevant elements of the event and informing the EPM of the results. Involving the Procurement Department early on process.	Considering the compliance, -related issues and advising the EI accordingly. Involving the Procurement department early on in order to achieve an optimum cost-benefit ratio for the event.

Subject	Duties and responsibilities of the Event Initiator (EI)	Duties and responsibilities of the Event Project Manager (EPM)
Approvals	Forwarding all approvals to the EPM before the event starts.	Requesting and documenting all approvals from the EI that are required according to the Event Policy before the event.
	Obtaining approval for events where participants receive monetary benefits (see 7.2 Approval of Events).	
	Obtaining approval for partial funding of events by a third party (see 8.3 Error! Reference source not found.).	
	Obtaining approval for one-to-one participant-host liaison at an event (see 8.2 Participant-Host Ratio).	
	Obtaining approval within the exemption clause to invite/allocate tickets to employees or companions of employees or other private use (see 11.2 Regulations for inviting employees to events).	

Subject	Duties and responsibilities of the Event Initiator (EI)	Duties and responsibilities of the Event Project Manager (EPM)
Compliance check	In case of uncertainty regarding the interpretation of the Company's policy on the Accepting and Granting of Benefits, initiating a check with the Compliance & Corporate Governance Department. This audit can be delegated to and in accordance with the EPM.	Initiating a compliance check through Compliance & Corporate Governance Department, this includes its documentation.
	Note: Compliance check guarantees the compliance with the relevant rules for the EI.	
	Adhering to Compliance rules (e.g. examining guest lists) when allocating tickets.	

7.2 Approval Of Events

As a general rule, events that grant monetary benefits to participants ("infotainment" and "leisure-based" event categories) must be approved by the Manager of the Cost Center Owner and by ONE Albania's Compliance & Corporate Governance Department.

The Event Initiator is responsible for obtaining the permission and providing it to the Event Project Manager (4-eyes-principle).

All other events need to be approved in writing prior to the event by the relevant manager/HOD of the Event Initiator.

7.3 Documentation and Completion of Events

Every event must be precisely documented – from the planning stage through to the final invoice. The Event Project Manager is responsible for the completeness of the documentation.

Necessary documentation according to the Policy:

- Form (briefing) including defined event objectives as well as changes to the original briefing.
- The Event Project Manager must document changes which diverge from the original briefing submitted by the Event Initiator. If these change requests generate additional costs, the Event Project Manager is required to advise the Event Initiator and, whenever possible, to recommend a less costly alternative, otherwise, he shall not carry out the changes. The result of this advice must also be documented.
- Invitation
- Agenda of the event / concept
- List of participants with the following fields:
 - Surname / first name, name of the company, details of any gifts and their gross value.
 - o If gifts will be handed out to guests as part of an event, the fields for gift allocation must be filled in on the participant list, or a separate list of recipients must be deposited.
 - o A total cost report including a schedule of costs per person. The costs per person can be calculated by dividing the total cost of the event by the number of registered participants.
- Result of the evaluation including the derived measures.
- All audit results and approvals (e.g., special approval by the Company's Compliance & Corporate Governance Department; written approval from the relevant manager and the manager of the cost center).

8. ECONOMIC ASPECTS OF EVENTS

8.1 Economic efficiency and appropriateness

Every employee is required to carefully manage business assets. The costs for every event should therefore provide the company with a reasonable counter-value (adequate rate of return). Compared to other communication tools, events offer direct and personal contact with target groups. However, this advantage also precipitates comparatively higher contact expenses (costs per person). Based on the defined objectives, a critical analysis of

which communication measures offer the best input to result ratio for the specific case must be conducted (see **Error! Reference source not found.**). A combination/integration of several means of communication is also frequently necessary in order to achieve the defined goals.

***Note:** Commercial bribery is a criminal offense. Events and event invitations are therefore prohibited from aiming for, or to be used to illicit preferential treatment from, or exert undue influence on a business partner. For more details, please refer to the Company's Policy on Accepting and Granting of benefits.

The objective and the target group are to be taken into account while planning an event, whereby the proposed budget and the principle of an adequate economic return constitutes its framework. Events must be planned and implemented according to the principles of efficiency and appropriateness (such as expenditure per person). Internal Group resources (e.g., its premises) are to be used as much as possible.

8.2 Participant-Host Ratio

A balanced participant-host ratio is required for certain events, when for example corporate customers or media representatives are being invited. Hosts are Company employees who liaise on functional terms with guests on site at the event (e.g., sales representatives). Event staff that have purely organizational tasks will not be considered in determining the participant-host ratio.

- For groups of up to 5 guests, those guests should be allocated to 1 host at least (participant-host ratio 5:1).
- For groups with more than 5 guests, to each host 15 guests at the most should be allocated (participant-host ratio 1:15).
- Companions of guests are not calculated in the participant-host ratio.

***Note:** A participant-host ratio of 1:1 is only allowed in exceptional cases. Only the relevant manager of the cost center and ONE Albania's Compliance & Corporate Governance Department can grant such permission. This permission must be obtained by the Event Initiator.

- Guests who receive tickets for sports or music events within the framework of a sponsorship should be accompanied by a host, on the occasion that a special event is organized addressed to specific target groups (e.g., corporate customers, media representatives etc.);

Whoever acts as a host assigned by the Event Initiator is to be seen as the representative of the Event Initiator and must assume all relevant functions. (see 7.1 **Error! Reference source not found.***Note: The regulations about the participant-host ratio do not apply to events in the work-related category.

8.3 Financing events by third parties

In general, events that are partially funded by business partners within contract-regulated sponsoring commitments or partnerships (e.g., strategic alliances), are generally permitted. Other than that, any other partial funding has to be approved in writing by ONE Albania's Compliance & Corporate Governance Department and the manager of the respective cost center. The Event Initiator is responsible for obtaining this permission. An audit must be initiated from ONE Albania Compliance Officer should any doubts or uncertainties arise.

8.4 Initiating orders and Procurement

To achieve the best cost-benefit ratio out of an event, the Event Project Manager must involve Procurement early on. All commissioned orders must follow ONE Albania's Procurement Policy.

9. GENERAL PRINCIPLES OF EVENT ORGANIZATION

9.1 The Event Organizing Team

The Event Organizing Team, which consists of members of Event initiator and members of the Event Project Manager, is responsible for the over viewing and the controlling of the event, so as to ensure strategy, brand, image and values within the scope of events of the Group. That Team reviews consistent annual roadmaps regarding events and budget planning for target conformity and approval.

Event divisions or business units assigned to plan and carry out events must create central and consistent annual event and budget planning for their area of responsibility.

9.2 Quality Standards

The Corporate Identity and the internal procedures of the Event Initiator are to be observed when planning and holding events.

9.3 Safety

The issue of safety should be fundamentally addressed by all those concerned with the event. The Event Project Manager is obliged to abide by the law as well as the company's own rules and has to coordinate within the respective areas – always depending on the extent of the event.

The Corporate Affairs Department and the Physical Security Officer are responsible for event security and advises and supports in this regard. By analyzing and evaluating event components, individual measures will be implemented depending on the situation.

9.4 Data Protection

When preparing and carrying out events, data protection laws and the Company's own regulations must be observed. In particular, the principles of data quality, data minimization and data avoidance.

9.5 Presence of Media Representatives

On the occasion that Media Representatives are present in any type of event, the Event Project Manager – if different from the team that is responsible for the media communication, shall inform timely the Corporate Affairs Department, in order to handle the Media representatives appropriately and the information to be communicated properly.

9.6 Sustainability – Ecological Events

Events influence environment in different ways. By selecting the event location, the effect on the environment can, for example, be reduced by minimizing travel to and from the event. Sourcing products and services in an environmentally friendly way also contributes towards this direction. The Event Project Manager is therefore obliged to set up an event in an environmentally friendly way from the planning stage and beyond.

10. LIST OF SPONSORING TICKETS

10.1 Ticket allocation within sponsoring commitments

Visiting events together with business partners should promote the establishment and maintenance of a business relationship, which is also based on personal trust and mutual respect. Inviting a business partner to an event must not be connected with any profound corporate objectives and business expectations.

- The allocation of tickets for events to business partners should evolve from the provisions in the agreement with the sponsorship recipient regarding the recipient's obligations towards the sponsor. The purchase of further ticket allocations is also possible in exceptional and justified cases buying into economic efficiency and appropriateness. As a general rule, all ticket purchase and allocations must follow the compliance standards and are to be documented.
- Allocating tickets to employees (including members of the middle and upper management) as an incentive is generally allowed, but their use for events with business partners is to be given priority.
- Tickets that are not used for the purposes described above (remaining tickets) can be used for media partners or staff campaigns (competitions) in compliance with the applicable guidelines.
- VIP boxes are primarily intended for high-ranking executives of important clients and partners.
- Tickets that become free on short notice can only be re-used by the host in line with the Policy. If this cannot be guaranteed, the tickets must be returned to the relevant event department, or they have to be voided (if too little time remains to allocate them to employees' campaigns or media representatives). Under no circumstances are such tickets to be used in a way that is contrary to the provisions of this policy, for example by passing them on to friends or family.

Note: The Event Initiator is responsible for adhering to the Compliance regulations (e.g., reviewing guest lists or checking the organizational units to which the tickets are distributed) when tickets are allocated (see 7.1 **Error! Reference source not found.**

When looking after guests, the host (e.g., sales staff) has to observe to the regulations mentioned in 7.1 Defining the responsibilities of the Event Initiator and the Event Project Manager and **Error! Reference source not found. Error! Reference source not found..**

11. COMPLIANCE RELEVANT ASPECTS OF EVENTS

11.1 Inviting third parties to events

The invitation /allocating tickets to an event constitutes the granting of a benefit in terms of the "Company Policy on the Accepting and Granting of Benefits" (Benefits Policy), which is also to be consulted.

11.2 Regulations for inviting employees to events

11.2.1 Invitations to employees

Inviting / allocating tickets to employees within the Company is not allowed if it is not for an incentive measure. Exemptions may be granted if an informal written confirmation is provided from ONE Albania Compliance Officer and the responsible manager of the cost center. The Event Initiator is required to obtain and document this approval.

11.2.2 Invitations to partners / companions of employees

Inviting / allocating tickets to companions and/or partners of employees or for any other private use is not allowed. Exceptions require permission in the form of an informal written confirmation by ONE Albania Compliance Officer. The Event Initiator is required to obtain and document this approval.

12. TAXATION OF MONETARY BENEFITS

National tax-relevant data and documents are to be taken into account prior to the event and national jurisdiction has to be observed.

13. COMPLYING TO CODE OF ETHICAL CONDUCT

These guidelines aim to assist in successfully implementing events in the interests of ONE Albania. Disciplinary action will be taken within the scope of applicable laws and internal regulations in cases of deliberate misconduct.

14. ENTRY INTO FORCE

This policy enters into force for ONE Albania by the decision of the Board of Directors.

15. REVIEW OF THIS POLICY

On the occasion of amendments of the Policy, the provisions of the Corporate Process Approval Policy shall apply.

16. DEFINITIONS/ABBREVIATIONS

No definitions or abbreviations exist.

17. RELATED DOCUMENTS

No related documents exist.