

# Republika e Kosovës Republika Kosova-Republic of Kosovo Qeveria –Vlada-Government

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## Name of Strategy document:

## PLAN OF ACTION FOR THREE YEAR PERIOD 2016-2018 FOR IMPLEMENTATION OF THE STRATEGY ON TRAINING OF CIVIL SERVANTS 2016-2020

#### Prishtina, November 2015

Basic information on this strategy document is in accordance with Article 9 of the Administrative Instruction - AI no. 02/2012 of Kosovo Government. Description of the proposed strategy document: 1. The Action Plan for the Strategy on Training of Civil Servants aims to create a critical mass of civil servants trained professionally and with appropriate knowledge and skills that will bring Kosovo closer to member states of the EU and integrate into these proposed structures. What is the priority of the Government that will be treated in this strategy? 2. The Action Plan is an implementation strategy document mentioned above. Both documents will deal with capacity building of civil servants, in accordance with Articles 33, 35, paragraph 3 and Article 58 of the Law No. 03 / L-149 on Civil Service. Why are needed proposed Strategy documents? 3. The main reason for the training of civil servants in Kosovo is to build a modern, professional and competent administration at central and local level, which provides quality services for citizens and legal entities. Years of implementation of the Action Plan: 4. This action plan for civil servants will be implemented during the period 2016 - 2018, i.e. in three years. The main document, the Strategy on training of civil servants, is proposed for longer time period 2016-2020. After evaluating and reviewing the implementation of this (first) Action Plan at the end of a three-year period, it is prepared the (second) Action Plan.

5.	Relation with APEP, if there is such:
	The Action Plan for the Stability Association Agreement (APASA), 2015, paragraph 91 and SAA.
6.	Interrelation with other Strategy documents:
	The strategy will take into account Governmental strategic documents such as Strategy for the modernisation of Public Administration 2015-2020 and the Action Plan for the modernisation of Public Administration 2015-2017.
7.	Is there any previous strategy that addressed this issue? The previous training Strategy 2011-2013 has expired in 2013.
8.	Interested parties including other ministries:  - Ministry of Public Administration, the Department of Civil Service Administration (MPA, DCSA),
	main institution for the coordination of Action Plan;  Vessys Institution for Public Administration (VIRA) — main institution for the implementation of
	<ul> <li>Kosovo Institution for Public Administration (KIPA) - main institution for the implementation of Action Plan;</li> </ul>
	<ul><li>Prime minister's Office, the office for Strategic Planning (PMO, OSP);</li></ul>
	<ul><li>Ministry of Finances (MF);</li></ul>
	<ul><li>Ministry of European Integration (MIE);</li></ul>
	<ul> <li>Ministry of Local Government Administration (MLGA);</li> </ul>
	<ul> <li>Ministry of Education, Science and Technology (MEST);</li> </ul>
	<ul> <li>Ministry for the Kosovo Security Forces (MKSF)</li> </ul>
	Ministries and governmental institutions mentioned above have nominated their members for the Special
	Inter Ministry Working Group for drafting the Strategy for Training of Civil Servants and the Action Plan for
	this Strategy according to the following:
	- The Decision of the General Secretary of MPA, issued on 3 <sup>rd</sup> November 2014, No. 5693, and
	- The Decision of the General Secretary of MPA, issued on 9th November 2015, No. 107.
9.	The involvement of Donors, either in drafting the Action Plan or in financing it: Implementation of this document would require funding from the Kosovo Budget (hereinafter in this

document KB). In the approved KB in 2016 the overall expenditures for the training of civil servants is 80,852.00 €. By these financial resources, will be covered training of at least **2,850 (15%)** of civil servants in the budget year 2016. The expenditures of civil servants for three-year Action Plan is calculated based on the existing KB and that is **214,352.00** €.

With these financial resources will be covered costs for training of at least **8,550** civil servants for the next three year period.

Funding from the EU (IPA) or other international donors is welcomed. At the time of adoption of this Action Plan international financial resources are not yet available. According to the Objective 14 of the Strategy for Modernisation of Public Administration (2015-2020) and the Action Plan for Modernization of Public Administration (2015 - 2017) the number of trained civil servants should be increased 5%, 19,000 every year. KB is not approved yet for covering these costs. If it is approved, the activities proposed in this Action Plan will be amended appropriately.

- We recommend the proposed strategy document to be approved by the Government, or if sufficient, to be approved by the Ministry:
  - Because of the importance they have these two strategic documents, they must be approved jointly by the Government of the Republic of Kosovo in the first quarter of 2016
- 11. The time when the draft of Action Plan will be sent to PMO for review in the government meeting or for review before the approval by the Ministry:

The draft of Action Plan will be sent to the PMO for review at the beginning of 2016.

#### 1. Introduction

The proposed document has as aim the improvement of the existing framework for civil servants. The Republic of Kosovo is facing significant changes related to the functioning of the rule of law, democracy and European integration. All these activities require adequate capacities of civil servants. Continuous development of these capacities will be a priority of the "Strategy for Training of Civil Servants," in the period from 2016 to 2020 (5 years).

Creating a critical mass of trained professionals with knowledge and skills will lead Kosovo towards effective democracy and integration into the European Union. In order to enable its effective implementation by all institutions of the Republic of Kosovo, the Government has also drafted the adequate Action Plan.

In the Action Plan for implementation of the Strategy for the Training of Public Civil Servants (STPCS) are detailed all the activities to be undertaken in order to achieve the objectives set in the strategy.

This action plan also identifies key institutions, indicators of success, progress measures, the financial cost of operations and relevant timetables for the implementation of each action. The identification of these actions is done in cooperation with major carriers of the Strategy for Training of Civil Servants 2016-2020:

- Ministry of Public Administration, the Department of Administration of Civil Service (MPA, DACS) main institutions for the coordination of the Action Plan;
- Kosovo Institution for Public Administration (KIPA) main institution for the implementation of Action Plan;
- Prime Minister's Office, the Office for Strategic Planning (PMO, OSP);
- Ministry of Finances (MF);

- Ministry of European Integration (MEI);
- Ministry of Administration of Local Government (MALG);
- Ministry of Education, Science and Technology (MEST);
- Ministry of Kosovo Security Forces (MKSF).

Ministries and governmental institutions mentioned above are members of the Inter-Ministerial Special Working Group for drafting the Strategy for Training of Civil Servants and Action Plan for this strategy by:

- The decision from Permanent Secretary of MPA, issued on 3rd November 2014, No. 5693, and
- The decision from Permanent Secretary of MPA, issued on 9th November 2015, No. 107.

Implementation of this document would require funding from the Kosovo Budget (hereinafter in this document KB). In the approved KB in 2016 the overall expenditures for the training of civil servants is 80,852.00 €. By these financial resources, will be covered training of at least 2,850 civil servants in the budget year 2016.

The expenditures of civil servants for three-year Action Plan is calculated based on the existing KB and that is 214.352,00€. With these financial resources will be covered costs for training of at least 8,450 civil servants for the next three year period.

Funding from the EU (IPA) or other international donors is welcomed. At the time of adoption of this Action Plan international financial resources are not yet available.

According to the Objective 14 of the Strategy for Modernisation of Public Administration (2015-2020) and the draft Action Plan for Modernization of Public Administration (2015 - 2017) the number of trained civil servants should be increased 5%, 19,000 of them every year. KB is not approved yet for covering these costs. If it is approved, the activities proposed in this Action Plan will be amended appropriately.

## 2. Time period for the proposed Action Plan (3 years)

The Action Plan for the training of civils servants will be implemented during the rime period 2016 – 2018, i.e. during three years.

The time period is defined according to the Article 9 of Administrative Instruction – AI No. 02/2012 of Kosovo Government.

The implementation of the main document, the Strategy for Training of Civil Servants is planned for the time period of five years - 2016-2020.

After the evaluation of the Action Plan, it will be prepared the reviewed Plan for the time period 2017-2019.

#### 3. Strategy Objectives

The Action Plan consists of five (5) strategic objectives defined according to the strategy (STCS). Key strategic objectives of the new Strategy for Training of Civil Servants are the following:

- Objective 1): Increasing the level of professionalism in the civil service.
- Objective 2): Increasing the level of general and specific knowledge needed for the membership of Kosovo into European Union.
- Objective 3): Increasing the level of administrative services that meet the citizens' needs.

- Objective 4): Increasing the level of use of modern information technology in the daily work of civil servants.
- Objective 5): Centralization of financial resources for the implementation of the Strategy.

By the end of 2018, as it is stated in the Strategy of Training of Civil Servants the feasibility assessment of defined activities and updating of the Plan will be done at the end of each month.

## 4. Reporting and evaluating the Implementation of the Action Plan

Evaluation of the implementation of activities and coordination and monitoring of activities will be done through mechanisms that are clearly identified and explained in this Action Plan.

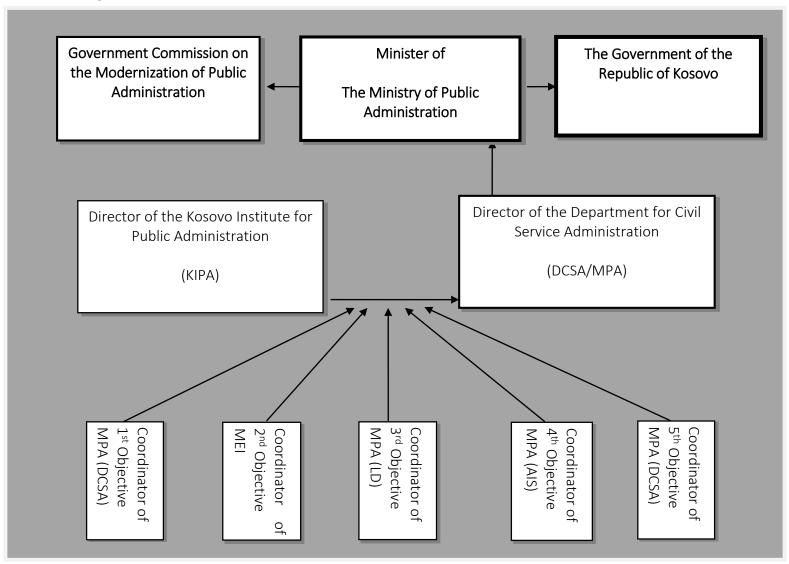
Major institutions that are directly responsible for monitoring the implementation of the Action Plan are the MPA, DACS and KIPA.

In order to ensure coordination of achieving (5) objectives through activities defined by the Action Plan, the Government of Kosovo appoints a coordinator for each objective. Coordinating institutions for five (5) objectives are the following:

- ✓ Coordinator for the Objective 1 MPA, DACS (the Department of the Administration of Civil Service)
- ✓ Coordinator for the Objective 2 MEI (The Department responsible for reformation of Public Administration)
- ✓ Coordinator for the Objective 3 MPA, LD (Legal Department)
- ✓ Coordinator for the Objective 4 MPA, AIS (Agency of Information Society)
- ✓ Coordinator for the Objective 1 MPA, DACS (Department of Administration of Civil Service).

DACS / MPA is the main coordinator of the Action Plan, and KIPA, as the main executive of the Action Plan, report once a year - by the end of March each year to the Minister of Public Administration. Coordinators have to prepare an annual evaluation of implementation of this strategic document and report to the Minister responsible for Public Administration. The deadline for preparation of the annual report is 31st March of each year. Training costs for the implementation of five strategic objectives of the Action Plan 2016 -2018 - will be balanced in the annual report for the previous year. Based on these reports from all coordinators, the DACS-MPA will propose to the Minister of Public Administration the new Annual Working Plan for the implementation of this Strategy and Action Plan. The Minister shall report annually to the Government and to the Commission for Modernization of Public Administration (Previous Commission of PAR). The government may decide that budgetary institutions with training budget, that have specific needs for the training of their civil servants, centralize their existing budgets by transferring the money to the budget account of KIPA. After the verification of received reports, the Minister of Public Administration will report to the Government of Kosovo.

Table 1: Reporting form on the implementation of the Action Plan



#### 5. Action Plan (table)

- The content of the Action Plan has been prepared in the form of a table.
- The Action Plan contains five (5) objectives and sub-objectives
- The Action Plan contains concrete actions, measures and sub-measures which are necessary for the implementation of the strategy.
- The Action Plan presents the recommended flow of action.
- The Action Plan contains indicators at the level of specific objectives.
- In the Action Plan table responsible institutions have been defined for each action and the success indicators including the timeframe for the implementation of all activities.
- In the last table of the Action Plan financial costs have been presented for each year, as well as the financial sources for each activity.

This part of the Action Plan would be very important for the assessment as well. The method of calculating the costs and description of the costs are attached in Annex 1 of the Action Plan. In the Action Plan table the financial cost for each year has been calculated, in total for three years, and the financial sources for each activity. The total annual cost of the Action Plan is consistent with the adopted budget of Kosovo (KB): 214.352,00 EUR (127.000,00 EUR for gross salaries of the KIPA staff, 80.352,00 for goods and services needed for training, and 6.500,00 EUR for utilities). The total cost for the three-year Action Plan is 241.056. EUR.

The cost according to the percentage of objectives:

46% of the total cost shall cover the implementation of 1<sup>st</sup> Objective,
24% of the total cost shall cover the implementation of 2<sup>nd</sup> Objective,
10% of the total cost shall cover the implementation of 3<sup>rd</sup> Objective, and
20% of the total cost shall cover the implementation of 4<sup>th</sup> Objective, while 5<sup>th</sup> Objective has no cost.

In the next three years 8.550 civil servants will be trained. Of the total number of civil servants, which is 19.000, on an annual basis 15% of them will be trained or 2.850 civil servants. On an annual basis, according to 1st Objective 1.311 civil servants will be trained, according to 2nd Objective 456 civil servants will be trained, according to 3rd Objective 285 civil sevants will be trained, and according to 4th Objective 570 civil servants will be trained.

Objective 1): Incre	asing th	e level of	profession	onalis	m in ci	vil se	rvice			
Aim: FURTHER INCREASE OF THE LEVEL OF PROFESSIONALISM IN CIVIL SERVICE										
Specific objective	Indi	cators at	the leve	l of the specific objective	2016-2018 OUTPUT 3 YEARS					
1. Introductory training for civil servants who start work for the first time in Civil Service					ned civil	servan	ts according to Objective 1	6,9 % CST		
Activities	Timefr ame for imple mentati on	Responsi ble institutio n	Supporti ng institutio n	2016	ost per y 2017	ear 2018	Total cost for activity	Source of Financing		
1.1. Training on ethics, integrity and transparency in Public Administration (PA)	2016 2017 2018	KIPA	MPA IRK	6,654	6,654	6,654	19,962	KB		
1.2. Training on Legislation regarding the functioning and organization of the state	2016 2017 2018	KIPA	MPA IRK	6,380	6,380	6,380	19,140	КВ		
1.3. Training in administering the office work	2016 2017 2018	KIPA	MPA IRK	4,390	4,390	4,390	13,170	КВ		

## Action Plan 2016-2018 – for the implementation of the Strategy on the Training of Civil Servants

Specific objective	Indicators at the level of the specific objective
2. Capacity development for civil servants through professional	Trained civil servants according to
trainings and promotion in career	Objective 1

Activities	Timefra	Responsib	Supporting	Fina	ancial cost	-	Total cost for	Source of
	me for implem entation	le institution	institution	2016	2017	2018	activity	financing
2.1. Training on planning and management Leadership and management (planning). Training on leadership and management	2016 2017 2018	KIPA	All budgetary organization s	1,811	1,811	1,811	5,433	КВ
2.2. Training on the evaluation of regulatory impact and in drafting concept documents	2016 2017 2018	KIPA	MPA/ OPM	2,610	2,610	2,610	7,830	КВ
2.3. Training on public communication	2016 2017 2018	KIPA	MPA/ OPM	1,250	1,250	1,250	3,750	КВ
2.4. Training on drafting, implementing, coordinating and monitoring the policies	2016 2017 2018	KIPA	IRK	1,911	1,911	1,911	5,733	КВ
2. 5. Training on managing human resources, staff planning, setting objectives, drafting job descriptions and evaluating performance results	2016 2017 2018	KIPA	MPA/ DCSA	2,120	2,120	2,120	6,360	КВ
2.6. Training on establishing and re-organizing organizational structures of Public Administration institutions	2016 2017 2018	KIPA		2,115	2,115	2,115	6,345	КВ
2.7. Training of trainers on human resource policies	2016 2017 2018	KIPA		1,098	1,098	1,098	3,294	КВ
2.8. Training on providing services to citizens and businesses	2016 2017 2018	KIPA		1,900	1,900	1,900	5,700	КВ

2.9. Training on budget	2016	KIPA	1,130	1,130	1,130	3,390	KB
planning, management of public	2017		ŕ	,	,	,	
finances and internal auditing	2018						
2.10. Training on public	2016	KIPA	1,911	1,911	1,911	5,733	KB
procurement	2017						
	2018						
2.11. Training on the protection	2016	KIPA	1,911	1,911	1,911	5,733	KB
of personal data and access to	2017						
public/official documents	2018						
			37,191	37,191	37,191		KB
TOTAL -			<b>(46</b> %	<b>(46</b> %	<b>(46</b> %	(46 % of the	
OBJECTIVE 1			of	of	of	total budget	
			annua	annual	annual	for training)	
			1 KB	KB for	KB for		
			for	2017)	2018)		
			2016)				

# Objective 2): Increasing the level of general and specific knowledge needed for membership of Kosovo into European Union

**Aim:** DEVELOPING AND BUILDING CAPACITIES FOR THE IMPLEMENTATION OF OBLIGATIONS DERIVING FROM SAA AND THE FRAMEWORK FOR MEMBERSHIP IN EUROPEAN UNION

Specific objective	Indicators at the level of the specific objective			2016 -2018 OUTPUT 3 YEARS			
1. Developing and building capacities for the process of European integrations, with a focus on policy planning, legislation alignment, assistance program, evaluation and monitoring.	1. Number of civil servar trained in the activities in the frame of the objective.			3,6 % NC			3,6 % NCT
Activities	Timeframe for implementat ion	Responsi ble institutio n	Supp ing instit	Cost per y 2016 2017	zear 2018	Total cost for activity	Source of financing

1.1. Training in aligning national	2016	MEI	KIPA					КВ
legislation with the EU legislation	2017			3,520	3,520	3,520	10,560	
(Acquis)	2018							
1.2. Training in judicial and legislative	2016	MEI	KIPA					KB
aspects (provisions) of SAA - specific	2017			2,876	2,876	2,876	8,628	
training	2018							
1.3. Training in policy implementation in	2016	MEI	KIPA					KB
the frame of SAA	2017			2,620	2,620	2,620	7,860	
	2018							
1.4. Training in monitoring and	2016	MEI	KIPA					KB
reporting on SAA implementation	2017			2,644	2,644	2,644	7,932	
	2018							
1.5. Training of officials in the field of	2016	MEI	KIPA					KB
aligning national legislation with EU	2017			3,772				
legislation, in particular for specific	2018			3,112	3,772	3,772	11,316	
areas/chapters of acquis								
1.6. Training on foreign assistance and	2016	MEI	KIPA					KB
monitoring and evaluation of EU	2017			2,972	2,972	2,972	8,916	
assistance projects	2018							
			,	19,404	19,404	19,404	(24 % of	KB
TOTAL -			,	24 % of nual KB	(24 % of	(24 %	the total	
OBJECTIVE 2				or 2016)	of annual	of annual	budget for	
			1,	01 2010)	KB for	KB for	training)	
					2017)	2018)	<i>(</i> )	

Objective 3): Capacity building in providing administr	ative services								
Aim: IMPROVING THE LEVEL OF ADMINISTRATIVE SERVICES THAT MEET THE NEED OF CITIZENS									
Specific objective	Indicators at the level of the specific objective	2018 OUTPUT							

								3 YEARS	
1. Capacity building of civil servants in implementing administrative procedures					Trained civil servants according to Objective 3				
Activities	Timefra	Responsi	Supportin	Со	st per yea	ır	Total	Source of	
	me for implem	ble institutio	g institutio	2016	2017	2018	cost for activity	financing	
4.57	entation	n	n	2.000	2 000	2 000	0.700	ICD	
1. Training of civil servants in implementing the Law on general	2016 2017	KIPA	MPA/IRK	2,900	2,900	2,900	8,700	КВ	
administrative procedures	2018								
2. Training in implementing unique classification signs for documents	2016 2017	KIPA	MPA/IRK	2,485	2,485	2,485	7,485	KB	
Classification signs for documents	2018								
3.Training in providing services for citizens and businesses (with a special	2016 2017	KIPA	MPA/IRK	2,700	2,700	2,700	8,100	KB	
focus on municipal level)	2017								
TOTAL -				8,085 (10 % of	8,085 (10 %	8,085 (10 %	(10 % of the total	KB	
OBJECTIVE 3				annual KB for	of	of annual	budget for		
				2016)	KB for	KB for	training)		
					2017)	2018)			

Objective 4): Using advanced information technology in t	he daily work of civil servants								
Aim: INCREASING THE LEVEL OF USING ADVANCED INFORMATION TECHNOLOGY IN THE DAILY WORK OF CIVIL SERVANTS									
Specific objective	Indicators at the level of the specific objective	Target 2016- 2018							

								OUTPUT 3 YEARS
1. Training in the field of IT through ba	sic program	ıs		Trained o	3 % NCT			
Activities	Timefra me for impleme ntation	Respons ible instituti on	Support ing instituti on	Cost per year Total cost for activity				Source of financing
1.1.Training on Microsoft Office application programs package ECDL (European Computer Driving License)	2016 2017 2018	MAP/ AIS	-	2,695	2,695	2,695	8,085	КВ
<ul><li>1.2. Training of civil servants on</li><li>- Microsoft Project</li><li>- Microsoft Visio &amp;</li><li>- Microsoft Lync</li></ul>	2016 2017 2018	MAP/ AIS	KIPA	2,895	2,895	2,895	8,085	КВ
Specific objective				Indicators at the level of the specific objective				
2. Training in the field of IT through adva	anced progr	ams		Trained civil servants according to Objective 4				
Activities	Timefra	Respons	Supporti		t per yea		Total	Source of
	me for implem entation	ible instituti on	ng institutio n	2016	2017	2018	cost for activity	financing
2.1. Training in Management Information Systems (Engineering Systems, IT security, Infrastructure library of information technology /ITIL/ and e-Governance).	2016 2017 2018	MPA/ AIS	KIPA	1,990	1,990	1,990	5,970	КВ
2.2. Training and certification in - CISCO (CCNP, CCNP Security,) - micro-wave network, - fiber optics, - Wireless, -VoIP.	2016 2017 2018	MPA/ AIS	KIPA	2,795	2,795	2,795	8,385	КВ

2.3. Training in advanced management	2016	MPA/	KIPA	2,255	2,255	2,255	6,765	KB
(General management, Quality	2017	AIS						
management, Management of projects	2018							
and processes, Strategic management,								
Operational management).								
2.4. Training of civil servants in using	2016	MPA/	KIPA	3,540	3,540	3,540	8,085	KB
Human Resources Management	2017	AIS						
Information System (HRMIS)	2018							
				16,170	16,170	16,170		KB
TOTAL -				(20 % of	(20 %	(20 %	(20 % of	KD
OBJECTIVE 4				annual	of	of	the total	
				KB for	annual	annual	budget for	
				2016)	KB for	KB for	training)	
					2017)	2018)		

Objective 5): Centralization of financial resources for the implementation of the Strategy							
Aim: Ensuring financial means through the centralization of the budget in KIPA from other institutions for the							
implementation of the Training Strategy of Civil Servants							
Specific objective	Indicators at the level of	Base/	Target 2016 -2018				
	specific objective	Current					
		situation					
1. Centralizing budget policies for	The necessary policy document	Initial phase	Transfer of financial resources to				
training civil servants	to cover the costs of Strategy		KIPA for training				
	implementation which exceed						

	the activities of the Action Plan (specific training)  The document has to be signed among the institutions which are the coordinators of this Plan of Action.					
1. Activities	Timefra me for impleme ntation	Responsible institution	Suppo ting institu ion			er year 7 2018
<ul> <li>1.Identification and analysis of budgetary means for the training of civil servants in budgetary organizations</li> <li>2.Drafting the concept document</li> <li>3. Approval of the budget according to the new proposed policy</li> </ul>	K1/2016	MPA/MF/ KIPA	IRK	00 euro	00 euro	00 euro

SUMMARY							
OBJECTIVES	INDICATORS 2016- 2018	TARGET 2016-2018					

		TOTAL TCS (TRAINED CIVIL SERVANTS)		(From the	% TCS (From thr total of 19.000 civil servants)		
OBJECTIVE 1	BUDGET FOR OBJECTIVE 1	TRAINED CIVIL SERVANTS		TARGET FOR TRAINED CIVIL SERVANTS OUT OF THE TOTAL OF 19000			
	46%	2016 2017		2018	TOTAL		
	37,191	1.311	1.311	1.311	6,9% TCS		
OBJECTIVE 2	BUDGET FOR OBJECTIVE 2	TRAINED CIVIL SERVANTS			Trained civil servants out of the total of 19000		
	24%	2016	2017	2018	TOTAL		
	19,404	684	684	684	3,6 % TCS		
OBJECTIVE 3	BUDGET FOR OBJECTIVE 3	TRAINED CIVIL SERVANTS		Trained civil servants out of the total of 19000			
	10%	2016	2017	2018	TOTAL		
	8,085	285	285	285	1,5 % TCS		
OBJECTIVE 4	BUDGET FOR OBJECTIVE 4	TRAINED CIVIL SERVANTS		Trained civil servants out of the total of 19000			
	20%	2016	2017	2018	TOTAL		
	16,170	570	570	570	3 % TCS		
OBJECTIVE 5	BUDGET FOR OBJECTIVE 5	Phase 1: inter-institutional agreement			Case by case in 2016		
	-	Phase 2: Budget for tr centralized in the K		Following the annual evaluation in 2017, 2018			
	TOTAL BUDGET	TOTAL BUDGET PI	ER YEAR	TRAINED CIVIL SERVANTS OUT OF THE			

TOTAL	FOR AP 3 YEARS			TOTAL OF 19000				
	100% 643.056,00 EUR	Salaries and wages Goods and services		2016	2017	2018	Total	
043.030,00 ECK	Utilities TOTAL	6,500.00€ 214.352,00€	2.850 15% NCT	2.850 15% NCT	2.850 15% NCT	8.550 15% NCT		