

2025

# Transparency Report KEI Auditing & Consulting



KEI Auditing & Consulting

3/31/2026

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## **KEI Auditing & Consulting leadership message**

This report sets out the practices and processes that are currently employed by KEI Auditing & Consulting Shpk, in accordance with article 45 of the Law no. 10091 dated March 5, 2009 “On statutory audit, organization of the statutory auditor profession and certified accountant”, as amended.

All information provided in this report relates to the situation of KEI Auditing & Consulting on December 31, 2025, except if indicated otherwise.

Delivering high-quality audit and assurance services with integrity and ethical behavior remains our top priority. We take pride in our quality-first culture and dedication to professional excellence as we fulfill our purpose to strengthen trust and transparency in the capital markets.

The significance of the role we play in protecting the investing public has intensified in the face of evolving regulations, technology advancements, and macroeconomic influences. In response, we remain committed to continuously improving and transforming our business to further enhance quality, achieve client service excellence, and provide a talent experience that offers opportunities for our people to grow their skills and capabilities.

Our teams embody our strategy by leveraging a risk-based and data-driven approach to auditing paired with cutting-edge technology.

The 2025 Transparency Report provides an in-depth look at our structure, governance, and approach to delivering high-quality audit and assurance services, all of which is supported by our robust system of quality control.

We publish this report annually to provide disclosure on certain categories of information related to corporate governance and transparency. We welcome the opportunity to share this information about our business and how we are protecting the public interest with integrity and ethical leadership.

Thank you for your interest in learning more about the ways we are strengthening our culture of quality, sustaining our commitment to ethics and integrity, and continuing to set the standard of excellence for our profession.

Sincerely,

**Iris Qirjaqi,**

**Statutory auditor, ACCA**



**Administrator**

**KEI Auditing & Consulting Shpk**

## About us

KEI established its offices in 2000 being among the first auditing and consulting services firms providing professional services to the local market.

The first statutory auditors in Albania were licensed in 2000, among them KEI's managing partner Eftali Qirjaqi. She brings its broad experience in auditing, tax, accounting and court expertise services.

### *Hand-On Experience*

KEI uses the benefit of its hand-on experience to provide a strong level of local understanding and support, in accordance with the international professional standards. The assurance partner Iris Qirjaqi brings its international experience from its previous employment with PwC Albania working with local and international clients who are key players and leaders in the Albanian and international market. The tax partner uses the benefit of his experience with the tax authorities to provide a strong level of local tax understanding and support.

### *Our Mission*

We consider it our mission to help our clients find solutions to complex problems arising in the course of today and offer them services of the highest quality. To serve our clients best, we aspire to understand their business and specifics of industry they operate in.

### *Purposes and values*

Our Shared Values are at the core of each decision we make, how we act, and help us deliver impact how and where it matters most.

### *Lead the way*

We are not only leading the profession, but also reinventing it for the future. We are also committed to creating opportunity and leading the way to a more sustainable world.

### *Serve with integrity*

By acting ethically and with integrity, we have earned the trust of clients, regulators, and the public. Upholding that trust is our single most important responsibility.

### *Take care of each other*

We look out for one another and prioritize respect, fairness, development, and well-being.

### *Foster inclusion*

We are at our best when we foster an inclusive culture and embrace diversity in all forms. We know this attracts top talent, enables innovation, and helps deliver well-rounded client solutions.

### *Collaborate for measurable impact*

We approach our work with a collaborative mindset, teaming across businesses, geographies, and skills to deliver tangible, measurable, attributable impact.

## **Our quality management policies**

### **Documentation policy statement**

The firm requires that appropriate documentation be in place to provide evidence of the operation of each component of its system of quality management.

The firm's quality management toolkit, containing all policies and procedures, is made available to all team members (in soft copy and hard copy) and feedback on the system of quality management is encouraged. The quality objectives, quality risks and responses are not static, and all team members can contribute to ensuring these are kept up to date and relevant.

All team members have a responsibility for quality in the firm and are expected to comply with all policies and procedures. Any changes to the quality management toolkit and/or the firm's policies and procedures will be explained to members at the regular team meetings.

Documents relating to the system of quality management will be retained for at least **5 (five)** years.

### **System of Quality Management 'hub' document**

*Our philosophy centers on the purpose to perform high quality engagements and build trust in society*

Our philosophy represents the beliefs of the firm and our understanding of how we work and provide services to our clients.

#### *Membership of IEKA*

We value our membership at IEKA and strive to be active members. As the conduct of individual members reflects upon the whole profession, we endeavor to refrain from any conduct which might bring discredit to our profession.

#### *Client relationships*

We seek to add value to all client relationships through our skills, knowledge and efforts.

Our clients are carefully selected to ensure they have appropriate levels of integrity and will benefit from our relationship. We try to help clients define and achieve their personal goals and consider these in establishing the goals of the business they currently own and operate.

The firm has served different clients for many years, and we take comfort from and appreciate their continued trust. We seek to be a trusted service provider to our clients. To achieve this aim, we provide a high level of service that complies with professional and ethical standards.

#### *Relationship with the team*

We see our employees as more than human resources. We aim to attract employees with integrity and the 'right' attitude. Communication, direction and training play important roles in our interaction with the team.

#### *Background of the firm*

The firm provides assurance, tax and accounting services to clients in a broad range of industry areas as: technology, trading, construction, production etc.

The firm is registered in the public register of the statutory auditors of Albania with no. 919 dated 02.02.2025.

The firm has 3 statutory auditors:

- Iris Qirjaqi with license no. 350 dated 16.01.2015
- Eftali Qirjaqi with license no. 11 dated 11.01.2000
- Kristi Lula with license no. 510 dated 02.10.2023

### *Firm structure*

Refer to the firm structure diagram below. The firm is not part of a network.

### **As at 31.12.2025**

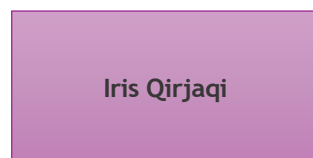
#### **Shareholders**



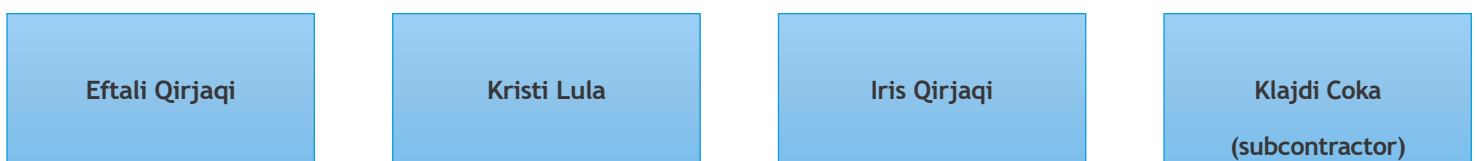
#### **Administrators**



#### **Audit Engagement Partners**



#### **Audit team**



#### **Audit Quality Reviewers team**



The organization structure is designed to ensure that clients have confident, easy access to more than just one person in the firm, but a partner is appropriately involved in all outward correspondence and reports.

### *Engagement Partner Compensation*

The company's partners are rewarded with salary as well as dividends distributed in accordance with the company's own decisions.

Our staff is engaged in a structure that promotes: the use of best practices to help recruit the best professionals, the development and retention of our employees through programs that encourage and challenge them to be better leaders in their professional field, continuous training and professional development through the management process with a focus on achieving technical expertise and excellence.

### *Firm goals*

As a firm, we acknowledge that we have an obligation to serve our clients and our profession. The primary goal of our firm is to fulfil these obligations and deliver high quality work:

- To provide excellent service to our clients in all areas appropriate for the auditing and assurance profession.
- To assure excellence in client service through maintaining the highest level of competence, independence and integrity within the firm.
- To be involved in and contribute to the advancement of the accountancy profession and our community.
- To provide within the firm the opportunity for personal and professional advancement, growth in skills and personal interrelationships, and rewarding work experiences.
- To maintain our scope of service and circle of clientele by developing and improving special skills and expertise.

### *Firm size*

The firm currently has 2 engagement partners, 3 statutory auditors and 4 professional employees.

### *Client service approach*

Superior client service is our primary objective and operating guideline, within the confines of law and professional standards. We seek to provide this service by making the full extent of our professional capabilities available to each client, ensuring their varying needs are met on a timely basis.

Professional work that is outside of our areas of experience and expertise is not accepted. Often the client or potential client is referred to other professionals with appropriate skills and experience. In addition, audit engagements outside of our capabilities, mainly timing, are not accepted.

In seeking to provide excellent professional service to each client, we approach each engagement, large or small, with the following objectives:

- Obtain thorough knowledge of the client and their industry, in order to properly evaluate the risks, events and conditions affecting it and its financial position and progress.
- Accurately evaluate the strengths and weaknesses of the client's internal accounting and administrative controls, its accounting and administrative information systems and its other features, in order to effectively advise the client and fulfil the engagement objectives.
- Identify and communicate situations and potential actions that appear to be opportunities for improving the client's operations and conditions.
- Be alert to areas of personal assistance to the owner-manager of client firms, so that our services may

be of maximum benefit to the client.

### *Professional services*

We offer professional services in audit and review of financial statements, other assurance engagements, and agreed-upon procedures engagements. We provide tax and accounting services and advisory services (mergers, divisions, transfers of commercial companies, due diligences).

Our clients are diverse and span many industries, including as agriculture, construction, trading, manufacturing, student accommodation, urban waste management etc.

We seek to continue our service to these industries and to develop additional industry competence over time. We provide a structure for interpersonal relationships that creates an atmosphere conducive to promoting planning, to servicing client needs and to responding effectively to opportunities and problems.

Our firm does not engage with large or high-profile listed entity audit engagements but mainly focuses on non-PIE entities and smaller PIE entities audit engagements.

### *Geographic details*

The firm's clients are largely located in Tirana, Shkodra and Durres. We do not actively seek clients outside of this area.

### **Risk assessment process policy statement**

The firm applies a risk-based approach in designing, implementing and operating the components of the system of quality management in an interconnected and coordinated manner such that the firm proactively manages the quality of engagements it performs.

The firm designs and implements a risk assessment process to establish quality objectives, identify and assess quality risks and design and implement responses to address the quality risks.

### *Quality objectives*

Quality objectives are the desired outcomes in relation to the components of the system of quality management to be achieved by the firm.

The firm has established the quality objectives specified in paragraphs 28—33 of **ISQM 1**. The firm has not identified any additional quality objectives considered necessary to achieve the objectives of the system of quality management. The quality objectives the firm has established are kept under regular review to ensure they reflect any relevant changes.

### *Quality risks*

A quality risk is a risk that has a reasonable possibility of:

- (a) Occurring; and
- (b) Individually, or in combination with other risks, adversely affecting the achievement of one or more quality objectives.

The firm identifies and assesses quality risks to provide a basis for the design and implementation of responses. In doing so, the firm:

- (a) Obtains an understanding of the conditions, events, circumstances, actions or inactions that may adversely affect the achievement of the quality objectives, including:
- (i) With respect to the nature and circumstances of the firm, those relating to:
    - The complexity and operating characteristics of the firm;
    - The strategic and operational decisions and actions, business processes and business model of the firm;
    - The characteristics and management style of leadership;
    - The resources of the firm, including the resources provided by service providers; and
    - Law, regulation, auditing and assurance standards and the environment in which the firm operates.
  - (ii) With respect to the nature and circumstances of the engagements performed by the firm, those relating to:
    - The types of engagements performed by the firm and the reports to be issued; and
    - The types of entities for which such engagements are undertaken.
- (b) Taking into account how, and the degree to which, these conditions, events, circumstances, actions or inactions may adversely affect the achievement of the quality objectives.

### *Responses*

Responses (in relation to a system of quality management) are policies or procedures that are designed and implemented by the firm to address one or more quality risk(s):

- (a) Policies are statements of what should, or should not, be done to address a quality risk(s). Such statements may be documented, explicitly stated in communications or implied through actions and decisions.
- (b) Procedures are actions to implement policies.

The firm designs and implements responses to address identified and assessed quality risks in a manner that is based on, and responsive to, the reasons for the assessments given to those quality risks. The firm's responses include the responses specified in paragraph 34 of **ISQM 1**.

### *Iterative approach*

The firm's system of quality management operates in a continual and non-linear manner and is responsive to changes in the nature and circumstances of the firm and its engagements.

The results of monitoring and remediation activities, results of external inspections and other relevant information (e.g., complaints and allegations) may identify information that indicates additional quality objectives, or additional or modified quality risks or responses, are needed due to changes in the nature and circumstances of the firm or its engagements. If such information is identified, the firm considers the information and when appropriate:

- (a) Establishes additional quality objectives or modifies additional quality objectives already established by the firm;
- (b) Identifies and assesses additional quality risks, modifies the quality risks or reassesses the quality risks;  
or
- (c) Designs and implements additional responses or modifies the existing responses.

## Risk assessment matrix

### Governance and Leadership

Quality Objectives	Quality Risks	Risk Responses (see section)
<p>(a) The firm demonstrates a commitment to quality through a culture that exists throughout the firm, which recognizes and reinforces:</p> <p>(i) The firm's role in serving the public interest by consistently performing quality engagements;</p> <p>(ii) The importance of professional ethics, values and attitudes;</p> <p>(iii) The responsibility of all personnel for quality relating to the performance of engagements or activities within the system of quality management, and their expected behavior; and</p> <p>(iv) The importance of quality in the firm's strategic decisions and actions, including the firm's financial and operational priorities.</p>	<p>Responsibilities with regards to quality are unclear and/or not well recognized among personnel because the accountabilities are not adequately updated and communicated.</p>	<p>3.1 Governance and leadership policy statement</p> <p>3.2 Assignment of responsibilities</p>
	<p>Firm's leadership do not prioritize quality in key strategic decisions and actions.</p>	<p>3.1 Governance and leadership policy statement</p>
	<p>Leadership and personnel prioritize other considerations (for example financial and operational performance) ahead of ethics, professional standards, values, and attitudes.</p>	<p>3.1 Governance and leadership policy statement</p> <p>3.2 Assignment of responsibilities</p>
	<p>Leadership and personnel do not apply scorecards and quality benchmarks to clearly recognize and reinforce the firm's role in serving the public interest by consistently performing quality engagements.</p>	<p>3.1 Governance and leadership policy statement</p> <p>3.2 Assignment of responsibilities</p>
	<p>Quality benchmarks are not given the appropriate weighting in the performance review process.</p>	<p>7.5 Professional staff performance review</p>
	<p>Resource allocation for the system of quality management is not given priority.</p>	<p>3.1 Governance and leadership policy statement</p> <p>1.2 System of quality management 'hub' document</p>
	<p>Quality management responsibilities are not allocated to the appropriate leader/s or personnel.</p>	<p>3.2 Assignment of responsibilities</p>
	<p>The firm has incentives that are focused on financial and operational priorities, which may discourage behaviors that demonstrate a commitment to quality.</p>	<p>3.1 Governance and leadership policy statement</p>

Quality Objectives	Quality Risks	Risk Responses (see section)
(b) Leadership is responsible and accountable for quality.	Firm leadership do not clearly take responsibility and exercise accountability for quality with an emphasis on timely remedial action.	3.2 Assignment of responsibilities 9.2 Monitoring and remediation policy statement
	The system of quality management is not designed to capture and provide information to assess and manage leaders' achievement of quality.	9.2 Monitoring and remediation policy statement 1.1 Documentation policy statement
(c) Leadership demonstrates a commitment to quality through their actions and behaviors.	Firm leadership do not demonstrate a consistent commitment to quality through actions and behaviors through firm-wide communication.	9.2 Monitoring and remediation policy statement
	Performance evaluations are not implemented on a timely basis for key leadership roles, including engagement partners, engagement quality reviewers, subject matter experts and those assigned responsibility for the firm's system of quality management.	3.2 Assignment of responsibilities 7.5 Professional staff performance review 7.6 Administrative staff performance review
(d) The organizational structure and assignment of roles, responsibilities and authority is appropriate to enable the design, implementation and operation of the firm's system of quality management.	Organizational structure and assignment of roles, responsibilities and authority is unclear and not well understood by firm personnel.	1.2 System of quality management 'hub' document 1.3 Firm structure
	Organizational structure and assignment of roles, responsibilities and authority is not appropriate to enable the design, implementation, and operation of the firm's system of quality management.	3.2 Assignment of responsibilities
(e) Resource needs, including financial resources, are planned for and resources are obtained, allocated or assigned in a manner that is consistent with the firm's commitment to quality.	Adequate resources are not able to be obtained to support the firm's commitment to quality.	3.1 Governance and leadership policy statement 3.2 Assignment of responsibilities
	Resource needs, including financial resources, are not adequately planned for, which may impact on allocation/ assignment.	3.1 Governance and leadership policy statement 3.2 Assignment of responsibilities

## Relevant ethical requirements

Quality Objectives	Quality Risks	Illustrative Risk Responses
<p>(a) The firm and its personnel:</p> <p>(i) Understand the relevant ethical requirements to which the firm and the firm's engagements are subject; and</p> <p>(ii) Fulfill their responsibilities in relation to the relevant ethical requirements to which the firm and the firm's engagements are subject.</p>	<p>Relevant ethical requirements are not clearly documented and communicated within the firm.</p>	<p>4.1 Relevant ethical requirements policy statement</p>
	<p>Relevant ethical requirements are not well understood by personnel.</p>	<p>4.1 Relevant ethical requirements policy statement</p> <p>4.2 Annual independence confirmation</p> <p>Regular training of all staff is undertaken, including when new changes are introduced.</p>
	<p>Personnel do not fulfill their responsibilities in relation to relevant ethical requirements.</p>	<p>4.2 Annual independence confirmation</p> <p>4.3 Independence resolution memorandum</p> <p>9.5 Client complaint record</p>
	<p>Personnel/firm knowledge relating to relevant ethical requirements is not kept up to date.</p>	<p>4.2 Annual independence confirmation</p> <p>7.7 Training and development record</p>
<p>(b) Others, including the network, network firms, individuals in the network or network firms, or service providers, who are subject to the relevant ethical requirements to which the firm and the firm's engagements are subject:</p> <p>(i) Understand the relevant ethical requirements that apply to them; and</p> <p>(ii) Fulfill their responsibilities in relation to the relevant ethical requirements that apply to them.</p>	<p>Relevant ethical requirements are not well understood by other key parties.</p>	<p>5.2 Client screening questions</p> <p>5.4 Ethical letter</p> <p>7.9 New service provider request form</p>
	<p>Other key parties do not fulfill their responsibilities in relation to relevant ethical requirements.</p>	<p>6.3 Using the work of experts</p> <p>6.4 Checklist for use of outside experts</p> <p>7.9 New service provider request form</p>

## Acceptance And Continuance Of Client Relationships And Specific Engagements

Quality Objectives	Quality Risks	Risk Responses
<p>(a) Judgments by the firm about whether to accept or continue a client relationship or specific engagement are appropriate based on:</p> <p>(i) Information obtained about the nature and circumstances of the engagement and the integrity and ethical values of the client (including management, and, when appropriate, those charged with governance) that is sufficient to support such judgments; and</p> <p>(ii) The firm's ability to perform the engagement in accordance with professional standards and applicable legal and regulatory requirements.</p>	<p>Adequate information about new or continuing clients and engagements is not obtained and considered on a timely basis.</p>	<p>5.1 Acceptance and continuance of client relationships and specific engagements policy statement</p> <p>5.2 Client screening questions</p> <p>5.3 New client form</p> <p>5.5 New client acceptance checklist</p> <p>5.6 Client retention checklist</p>
	<p>There is a lack of accountability or review process for judgments made about whether to accept or continue a client relationship or specific engagement.</p>	<p>5.1 Acceptance and continuance of client relationships and specific engagements policy statement</p> <p>5.2 Client screening questions</p> <p>5.5 New client acceptance checklist</p> <p>5.6 Client retention checklist</p>
	<p>Engagement considerations, including scope of engagement and operational requirements, are not clear enough to properly assess the firm's ability to perform the engagement in accordance with professional standards and applicable legal and regulatory requirements.</p>	<p>5.4 Ethical letter</p> <p>5.5 New client acceptance checklist</p>
	<p>There are insufficient personnel available to perform all engagements during times of peak demand.</p>	<p>5.2 Client screening questions</p> <p>5.5 New client acceptance checklist</p>

Quality Objectives	Quality Risks	Risk Responses
<p>(b) The financial and operational priorities of the firm do not lead to inappropriate judgments about whether to accept or continue a client relationship or specific engagement.</p>	<p>Revenue inappropriately influences judgments about whether to accept or continue a client relationship or specific engagement.</p>	<p>3.1 Governance and leadership policy statement  5.1 Acceptance and continuance of client relationships and specific engagements policy statement  5.2 Client screening questions  5.5 New client acceptance checklist  5.6 Client retention checklist  8.2 Culture assessment - quality</p>

## Engagement performance

Quality Objectives	Illustrative Quality Risks	Illustrative Risk Responses
<p>(a) Engagement teams understand and fulfill their responsibilities in connection with the engagements, including, as applicable, the overall responsibility of engagement partners for managing and achieving quality on the engagement and being sufficiently and appropriately involved throughout the engagement.</p>	<p>Policies and processes for supervision and review are not clearly set out and understood by team members.</p>	<p>6.1 Engagement performance policy statement 6.2 Work control form</p>
	<p>Adequate skills and experience are not available at critical points of engagement or to manage complex issues.</p>	<p>6.2 Work control form 6.3 Using the work of experts 6.4 Checklist for use of outside experts</p>
	<p>Respective roles and responsibilities of engagement team members are unclear.</p>	<p>6.1 Engagement performance policy statement 6.2 Work control form</p>
	<p>Engagement team members, including engagement partners, are allocated a reasonable amount of time to complete their work and achieve quality on the engagement.</p>	<p>6.2 Work control form</p>
<p>(b) The nature, timing and extent of direction and supervision of engagement teams and review of the work performed is appropriate based on the nature and circumstances of the engagements and the resources assigned or made available to the engagement teams, and the work performed by less experienced engagement team members is directed, supervised and reviewed by more experienced engagement team members.</p>	<p>Adequate levels of review and supervision are not provided to less experienced engagement team members by more experienced engagement team members.</p>	<p>6.1 Engagement performance policy statement 6.2 Work control form</p>
	<p>Composition of engagement team members is not appropriate for the type of engagement, nature of client and/or the industry in which it operates.</p>	<p>6.2 Work control form 6.3 Using the work of experts 6.4 Checklist for use of outside experts</p>
	<p>Complex audit areas or unexpected issues are allocated to personnel who lack the appropriate knowledge or experience.</p>	<p>6.2 Work control form</p>
	<p>Changes in firm or engagement circumstances during the engagement are not properly considered during the engagement.</p>	<p>5.2 Client screening questions 5.3 New client form 6.2 Work control form</p>

Quality Objectives	Illustrative Quality Risks	Illustrative Risk Responses
	The engagement is not conducted in accordance with applicable professional standards.	4.1 Relevant ethical requirements policy statement 6.1 Engagement performance policy statement 6.6 Engagement quality review form
(c) Engagement teams exercise appropriate professional judgment and, when applicable to the type of engagement, professional skepticism.	Engagement team members do not have adequate experience and training to exercise appropriate professional judgment/skepticism.	6.1 Engagement performance policy statement 6.2 Work control form 7.5 Professional staff performance review
	Professional judgment/skepticism is appropriately applied but not adequately documented.	6.5 Differences of opinion resolution
	Risk areas have not been adequately considered to prompt engagement teams to exercise appropriate professional judgment/skepticism.	6.1 Engagement performance policy statement 6.2 Work control form 9.3 Engagement review form
(d) Consultation on difficult or contentious matters is undertaken and the conclusions agreed are implemented.	Inadequate consideration of risks leads to consultation not being undertaken.	6.3 Using the work of experts 6.5 Differences of opinion resolution 6.6 Engagement quality review form
	Inadequately experienced personnel are assigned to gather information on and consider difficult or contentious matters.	6.1 Engagement performance policy statement 6.2 Work control form
	A lack of appropriate process and follow up leads to either consultations not being held or agreed conclusions not being implemented on difficult or contentious matters.	6.1 Engagement performance policy statement 6.2 Work control form 6.3 Using the work of experts 6.4 Checklist for use of outside experts 6.5 Differences of opinion resolution 6.6 Engagement quality review form

Quality Objectives	Illustrative Quality Risks	Illustrative Risk Responses
<p>(e) Differences of opinion within the engagement team, or between the engagement team and the engagement quality reviewer or individuals performing activities within the firm's system of quality management are brought to the attention of the firm and resolved.</p>	<p>Differences of opinion are not brought to the attention of the firm or appropriately dealt with due to a culture of agreeability or fear of reprisal.</p>	<p>6.5 Differences of opinion resolution</p>
	<p>Differences of opinion are not appropriately resolved due to a lack of time and resources.</p>	<p>6.2 Work control form 6.5 Differences of opinion resolution</p>
	<p>More experienced engagement team members or other individuals exert authority to inappropriately overrule differences in opinion.</p>	<p>6.1 Engagement performance policy statement 6.2 Work control form 6.5 Differences of opinion resolution</p>
<p>(f) Engagement documentation is assembled on a timely basis after the date of the engagement report and is appropriately maintained and retained to meet the needs of the firm and comply with law, regulation, relevant ethical requirements, or professional standards.</p>	<p>Engagement documentation is not assembled and secured on a timely basis after the date of the engagement report.</p>	<p>6.1 Engagement performance policy statement</p>
	<p>Engagement documentation is not appropriately maintained and retained to meet the needs of the firm and comply with law, regulation, relevant ethical requirements, or professional standards.</p>	<p>6.1 Engagement performance policy statement</p>
	<p>Archived documentation is reopened and revised without approval.</p>	<p>6.1 Engagement performance policy statement</p>
	<p>Firm's policies and processes on engagement documentation are not clearly communicated to all personnel.</p>	<p>1.1 Documentation policy statement 6.1 Engagement performance policy statement</p>

## Resources

Quality Objectives	Quality Risks	Risk Responses
<p><b>Human Resources</b></p> <p>(a) Personnel are hired, developed and retained and have the competence and capabilities to:</p> <p>(i) Consistently perform quality engagements, including having knowledge or experience relevant to the engagements the firm performs; or</p> <p>(ii) Perform activities or carry out responsibilities in relation to the operation of the firm's system of quality management.</p>	<p>Recruitment policies and processes are unclear or inappropriately documented to recruit personnel that have the knowledge and experience relevant to the engagements the firm performs.</p>	<p>7.1 Resources policy statement</p> <p>7.3 Candidate interview and evaluation checklist</p> <p>7.4 New staff orientation checklist</p>
	<p>The technical skills and professional education of firm personnel are not maintained as required.</p>	<p>7.7 Training and development record</p>
	<p>Personnel are not appropriately supervised, mentored, or motivated to consistently perform quality engagements.</p>	<p>7.1 Resources policy statement</p> <p>7.2 Job descriptions</p> <p>7.7 Training and development record</p>
	<p>Internal training is not appropriately developing competence of the firm's personnel.</p>	<p>7.5 Professional staff performance review</p> <p>7.7 Training and development record</p>
<p>(b) Personnel demonstrate a commitment to quality through their actions and behaviors, develop and maintain the appropriate competence to perform their roles, and are held accountable or recognized through timely evaluations, compensation, promotion and other incentives.</p>	<p>Performance evaluations are not held on a timely basis during or after each engagement.</p>	<p>7.1 Resources policy statement</p> <p>7.5 Professional staff performance review</p> <p>9.3 Engagement review form</p>
	<p>Compensation and incentives are focused on financial and operational priorities which are not consistent with achieving quality objectives.</p>	<p>7.1 Resources policy statement</p> <p>7.5 Professional staff performance review</p>
	<p>Performance evaluations are unclear about achieving outcomes, compensation, or incentives.</p>	<p>7.5 Professional staff performance review</p>
	<p>Personnel's workload is not considered when setting performance benchmarks against quality objectives.</p>	<p>7.2 Job descriptions</p> <p>7.5 Professional staff performance review</p>

Quality Objectives	Quality Risks	Risk Responses
<p>(c) Individuals are obtained from external sources (i.e., the network, another network firm or a service provider) when the firm does not have sufficient or appropriate personnel to enable the operation of firm's system of quality management or performance of engagements.</p>	<p>The firm's policies and processes for quality management and performance of engagements are not appropriately communicated to/agreed with externally sourced personnel prior to them commencing work on an engagement.</p>	<p>6.3 Using the work of experts 7.1 Resources policy statement 7.9 New service provider request form</p>
	<p>Externally sourced personnel do not have the appropriate capabilities or experience to comply with the firm's quality management system or perform the engagements as required.</p>	<p>6.3 Using the work of experts 7.9 New service provider request form</p>
	<p>Firm does not have onboarding policies and processes to support personnel obtained from external sources comply with the quality management system.</p>	<p>7.4 New staff orientation checklist</p>
<p>(d) Engagement team members are assigned to each engagement, including an engagement partner, who have appropriate competence and capabilities, including being given sufficient time, to consistently perform quality engagements.</p>	<p>Resource allocation including budgeted time and personnel allocation for each engagement is not adequate, but not addressed by the leadership team.</p>	<p>3.1 Governance and leadership policy statement 6.1 Engagement performance policy statement 6.2 Work control form</p>
	<p>Engagement team members and/or partners do not have appropriate competence and capabilities to consistently perform quality engagements.</p>	<p>7.2 Job descriptions 7.5 Professional staff performance review 7.7 Training and development record</p>
	<p>There are unreliable or no measurement indicators to assess whether resources assigned to each engagement are adequate.</p>	<p>6.1 Engagement performance policy statement 6.2 Work control form</p>
<p>(e) Individuals are assigned to perform activities within the system of quality management who have appropriate competence and capabilities, including</p>	<p>Individuals are not allocated the responsibility and sufficient and appropriate resources to perform activities within the system of quality management.</p>	<p>6.2 Work control form 7.2 Job descriptions</p>

Quality Objectives	Quality Risks	Risk Responses
sufficient time, to perform such activities.	Time for supervision and review is not provided for.	6.2 Work control form
	Additional time is not allocated when required for key matters.	6.1 Engagement performance policy statement 6.2 Work control form
<b>Technological Resources</b> (f) Appropriate technological resources are obtained or developed, implemented, maintained, and used, to enable the operation of the firm's system of quality management and the performance of engagements.	Technological resources are not enabling the operation of the firm's system of quality management and the performance of engagements.	7.1 Resources policy statement 7.8 Technology acquisition request form
	Technological resources are not being used to their full potential.	7.1 Resources policy statement 7.8 Technology acquisition request form
<b>Intellectual Resources</b> (g) Appropriate intellectual resources are obtained or developed, implemented, maintained, and used, to enable the operation of the firm's system of quality management and the consistent performance of quality engagements, and such intellectual resources are consistent with professional standards and applicable legal and regulatory requirements, where applicable.	Intellectual resources are not enabling the operation of the firm's system of quality management and the consistent performance of quality engagements.	7.1 Resources policy statement
	Intellectual resources are not being used to their full potential or are out of date.	7.1 Resources policy statement 7.5 Professional staff performance review
	Intellectual resources are not consistent with professional standards and applicable legal and regulatory requirements.	7.1 Resources policy statement
<b>Service Providers</b> (h) Human, technological or intellectual resources from service providers are appropriate for use in the firm's system of quality management and in the performance of engagements, taking into account the quality objectives in paragraph 32 (d), (e), (f) and (g) of ISQM 1.	Consistent and rigorous procurement, security and implementation policies and processes for technology and intellectual resources are not applied.	7.1 Resources policy statement 7.8 Technology acquisition request form 7.9 New service provider request form
	Personnel are recruited for specialist skills but are not appropriate for use in the system of quality management.	7.1 Resources policy statement 7.9 New service provider request form
	Policies and processes on how to apply and secure the firm's technological and intellectual resources are not clear and/or miscommunicated to personnel.	7.1 Resources policy statement 7.7 Training and development record 8.1 Information and communication policy statement

Quality Objectives	Quality Risks	Risk Responses
	Technological resources are not strategically assessed for future capabilities and engagement needs.	7.8 Technology acquisition request form
	Changes made to IT systems and programs are not adequately reviewed and approved/authorized.	7.8 Technology acquisition request form
	Personnel are not given the appropriate training and support to manage changes to IT systems or new technological resources.	7.1 Resources policy statement 7.7 Training and development record

## Information and communication

Quality Objectives	Quality Risks	Risk Responses
<p>(a) The information system identifies, captures, processes and maintains relevant and reliable information that supports the system of quality management, whether from internal or external sources.</p>	<p>Appropriate resources are invested in information systems, but systems are not utilized to their full potential.</p>	<p>7.1 Resources policy statement 7.7 Training and development record 8.1 Information and communication policy statement</p>
	<p>Information systems are not regularly reviewed or upgraded for operational purposes and engagement performance needs.</p>	<p>7.8 Technology acquisition request form</p>
	<p>Information systems are not tested or evaluated for data security on a regular basis.</p>	<p>7.8 Technology acquisition request form</p>
	<p>Back-up of data and information is not performed regularly enough and for selected databases.</p>	<p>7.8 Technology acquisition request form</p>
<p>(b) The culture of the firm recognizes and reinforces the responsibility of personnel to exchange information with the firm and with one another.</p>	<p>Firm's culture does not encourage/reward personnel who share knowledge and reliable information with well- intentioned motives.</p>	<p>8.1 Information and communication policy statement 8.2 Culture assessment - quality</p>
	<p>Firm does not have adequate policies and processes about information sharing.</p>	<p>8.1 Information and communication policy statement</p>
	<p>Personnel are not adequately trained on these policies to recognize instances when the responsibility to exchange information arises.</p>	<p>7.7 Training and development record 8.2 Culture assessment - quality</p>
<p>(c) Relevant and reliable information is exchanged throughout the firm and with engagement teams, including:  (i) Information is communicated to personnel and engagement teams, and the nature, timing and extent of the information is sufficient to enable them to understand and carry out their</p>	<p>Firm does not implement policies and processes to encourage personnel to share information with senior managers and other teams that need to be informed.</p>	<p>8.1 Information and communication policy statement</p>
	<p>Personnel are not encouraged, through policies and processes, or firm culture, to share information with team members about relevant engagement matters.</p>	<p>8.1 Information and communication policy statement</p>

Quality Objectives	Quality Risks	Risk Responses
<p>responsibilities relating to performing activities within the system of quality management or engagements; and</p> <p>(ii) Personnel and engagement teams communicate information to the firm when performing activities within the system of quality management or engagements.</p>	<p>Firm does not establish and/or use appropriate communication channels to facilitate an open exchange of information.</p>	<p>7.7 Training and development record</p> <p>8.2 Culture assessment - quality</p>
<p>(d) Relevant and reliable information is communicated to external parties, including:</p> <p>(i) Information is communicated by the firm to or within the firm's network or to service providers, if any, enabling the network or service providers to fulfill their responsibilities relating to the network requirements or network services or resources provided by them; and</p> <p>(ii) Information is communicated externally when required by law, regulation or professional standards, or to support external parties' understanding of the system of quality management.</p>	<p>Written and verbal communication are not sufficiently clear for the specific audience and requirements.</p>	<p>7.7 Training and development record</p>
	<p>Firm's policies and processes do not identify relevant, reliable information for communication to firm's network, service providers and external parties.</p>	<p>8.1 Information and communication policy statement</p>
	<p>Reliable technical and legal expertise are not readily available as and when required.</p>	<p>6.3 Using the work of experts</p> <p>6.4 Checklist for use of outside experts</p>
	<p>Continuous professional education, technical updates and soft skills development are not emphasized in internal training.</p>	<p>7.7 Training and development record</p> <p>9.3 Engagement review form</p>
	<p>The firm does not have appropriate policies and processes in place to provide personnel with guidance on how to present information, or how to respond to requests for information under, law, regulation, professional standards or to other external parties who need to understand the firm's system of quality management.</p>	<p>8.1 Information and communication policy statement</p>

ISQM 1 requires an annual evaluation of the SQM. KEI Auditing & Consulting performed its annual evaluation of its SQM as of May 31, 2025 and the follow up report as of September 30, 2025.

## Independence practices

The Quality Management Policies require our team to comply with the independence standards applicable to specific engagements, (e.g., the IESBA Code and Albanian Audit Law).

All KEI client-serving professionals at the ranks of manager through partner, and certain other personnel based on role or function, are required to confirm compliance with independence policies and procedures on an annual basis.

We consider and evaluate independence regarding various aspects, including our financial relationships and those of KEI professionals and other personnel; employment relationships; business relationships; the permissibility of services we provide to audit clients; applicable firm and partner rotation requirements; fee arrangements; and partner remuneration and compensation.

Failure to comply with applicable independence requirements will factor into decisions relating to a person's promotion and compensation, and may lead to disciplinary measures, including separation from KEI.

KEI is using the MyWorkpapers checklist to support us and our people in complying with independence policies.

KEI follows some independence learning programs for all KEI client-facing professionals, and certain other personnel, subcontractors, based on role or function. These professionals and other personnel are required to participate in annual independence learning to help maintain independence from KEI audit clients.

The goal is to help KEI professionals and others understand their responsibilities and to enable each of them, and their member firms, to recognize and be free from interests that might be regarded as incompatible with objectivity, integrity and independence in serving an audit client.

## Continuing Professional Development of Statutory Auditors

KEI Auditing & Consulting is committed to maintaining the highest standards of professional competence and ensuring that its statutory auditors continuously develop and update their knowledge and skills in line with evolving professional, regulatory, and business requirements.

The Firm has established a structured policy for **Continuing Professional Development (CPD)**, in accordance with applicable legal and regulatory requirements in Albania, as well as the principles set out by **IFAC** and relevant international education standards.

Under this policy, all statutory auditors and professional staff are required to complete a defined number of CPD hours annually (40), including both **verifiable and non-verifiable training**, covering areas such as:

- International Financial Reporting Standards (IFRS) and National Accounting Standards (SKK)
- International Standards on Auditing (ISA) and quality management (including ISQM 1)
- Ethics and independence requirements
- Regulatory updates and emerging topics (e.g. sustainability, anti-money laundering)

The Firm supports CPD through a combination of:

- participation in training programs organized by professional bodies (e.g. IEKA)

- internal technical training sessions and workshops
- attendance at international seminars, conferences, and webinars
- on-the-job learning and knowledge sharing within engagement teams
- self-study articles published mainly by Big 4 companies.

In addition, the Firm monitors compliance with CPD requirements through periodic reviews and maintains appropriate records of training completed by each professional. Where gaps are identified, targeted training plans are implemented to ensure continuous improvement.

Through this structured approach, KEI Auditing & Consulting ensures that its statutory auditors maintain the necessary competence and professional judgment required to perform high-quality audits in accordance with applicable standards and regulatory expectations.

## Financial

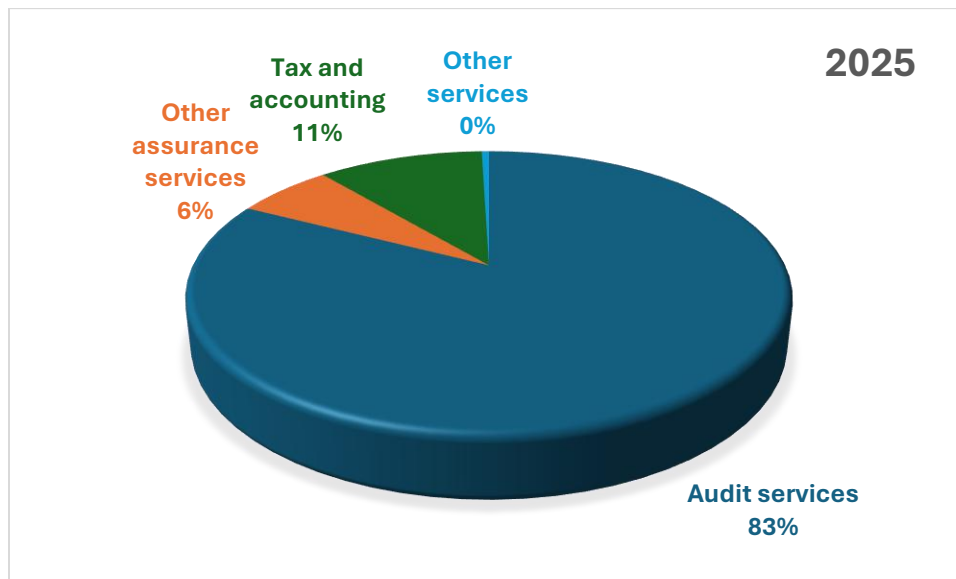
### Revenue

Revenue disclosed in this report include revenues from both audit and non-audit clients. Revenue is presented in accordance with Albanian statutory reporting rules as reported in the financial statements and includes for revenues from:

1. Statutory audit services
2. Other assurance related services
3. Tax and accounting services
4. Other services

Financial information for the year ended on 31 December 2025 are expressed in Albanian Lek.

Revenue	2025	%
<b>Audit services</b>	7,911,000	82.53%
<b>Other assurance services</b>	604,914	6.31%
<b>Tax and accounting</b>	1,024,168	10.69%
<b>Other services</b>	45,000	0.47%
	<b>9,585,082</b>	<b>100%</b>



### List of PIE audit clients

In the fiscal year that ended on 31 December 2025, KEI Auditing & Consulting performed audits of the financial statements as of and for the year ended December 31, 2024 for the following PIEs:

- Nderkomunale Bushat - shareholder is a public interest entity
- Trajtim Studenteve - shareholder is a public interest entity
- Jubica – 50% or more of the revenue is from public sector entities