

# Reward games in Kosovo in absence of a legal basis



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March 2024

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## Executive Summary

Currently, a variety of reward games are organized by Kosovo businesses without government oversight. Through these games, where customers stand to benefit from different prizes such as housing, vehicles, or various amounts of cash, businesses aim to encourage customers to make continuous purchases. Although more frequent in recent years, the practice of such games is not regulated by the legal framework in Kosovo. Businesses do not report to any institution about the awards, the method used to select winners, prize winners, etc.

Until May 10, 2019, the Law on Games of Chance governed reward games. Based on this law, to organize sweepstakes, reward games, and giveaways businesses were required to obtain permits from the Tax Administration of Kosovo (TAK), which also monitored the events organized for awards. In that period, business prize awards did not exceed one thousand euros. Due to the repeal of that law, whereby the Kosovo Government and Assembly intended to protect citizens from betting, games of chance, and related incidents in casinos, etc., the organization of reward games by businesses has remained unregulated. The organization of such games and the value of the awards is now the responsibility of the businesses themselves, without monitoring by state authorities. At the moment, just one of the big businesses is running a reward game with more than 150 awards, worth more than 100,000 euros.

According to GAP Institute calculations, based on open source online data, during 2009–2023, pledges for major prizes reached about 2.7 million euros. These prizes include housing, vehicles, and cash. Compared to the period when TAK monitored reward games, after 2019, pledges of prizes for customers multiplied by 16 times. The value of the awarded prizes is 12 times higher. According to the analysis, only half (54%) of the top prizes to be awarded are made transparent to the public, where the prizes are awarded either in live events broadcast on national television, social media, or using some formula that randomly selects the winners. None of the businesses (organizers of such games) contacted by GAP with a request for access to data have responded regarding the organization of these games.

Such a situation, with a legal gap and a lack of transparency, increases the likelihood that some businesses will not award prizes fairly, while boosting their own profits. This would be achieved either by paying less profit tax, as expenditure on prize games is fully deductible for tax purposes, or by not recording the prizes correctly for value added tax, but also by benefiting from increased sales due to the positive impact of reward game campaigns. Consequently, State tax revenues are adversely affected in several aspects.

Loyalty programs created by businesses, through which prizes are also awarded to consumers, remain unmonitored. Although the latter present less risk than reward games—because the award mechanisms are known in advance and the consumers can monitor their accumulated points or benefits, etc.—in 2021–2023, there were 12 complaints filed with the Consumer Protection Department at the Ministry of Industry, precisely about loyalty programs.

In the Western Balkans, in countries such as Albania and North Macedonia, reward games are fully regulated by a legal framework. State authorities monitor business reward games, and the organizers pay a fee. While in the countries of the European Union there is a wider use of loyalty programs, and this is also regulated by the legal framework. Since reward games and loyalty programs in Kosovo are not regulated at all, GAP Institute recommends that public institutions take measures to prevent businesses from exploiting legal gaps by organizing reward games to pay lower taxes or show favoritism in awards to certain individuals.

## Introduction

While making ordinary purchases, we often see different opportunities to become part of sweepstakes, reward games, and giveaways. Reward games are a common tool that businesses in Kosovo use as a marketing strategy to boost sales and their customer base. Through these games, businesses promise various prizes such as housing, vehicles, or various amounts of cash. To become eligible, in most cases, customers must make a minimum purchase of certain products from that business. However, customers often do not know what happens to the promised prizes, whether they are actually awarded and whether the awards are done according to fair criteria and through a transparent process.<sup>1</sup>

Another way to reward customers is through loyalty programs. A customer loyalty program is a marketing strategy that recognizes and rewards those who purchase or engage with a brand on a recurring basis. It offers benefits such as points, discounts, or easier access to products or services.<sup>2</sup> It boosts sales and deepens customers' connection with the brand, resulting in retention and increased spending. Investments in such programs benefit customers but also businesses, as loyal customers tend to spend more. Various studies have found that it is at least six times more expensive for businesses to acquire a new customer than to keep an existing one.<sup>3</sup> These programs are more commonly used in the countries of the European Union and other more developed countries, while in recent years they have become more prevalent in Kosovo. Unlike reward games, loyalty programs reward customers faster, or through instant price discounts. These programs may be administered by the business, an affiliate thereof, or a third party. These programs are also not monitored by any Kosovo authority.<sup>4</sup> Although award mechanisms in these programs are more transparent, and citizens can monitor the process of collecting points or benefits themselves, there is still room for irregularities. Which is why citizens have complained to the relevant authorities, as the findings in the following sections show.

The rising level of inflation, demand for convenience and speed, changing shopping habits, offering different platforms for online retail purchases/shopping, have emerged as the most frequent challenges faced by businesses after the COVID-19 pandemic.<sup>5</sup> Businesses in Europe have sought to address these challenges by rewarding their customers through various loyalty programs (i.e., gamification of purchases).<sup>6</sup>

In this report, GAP Institute has examined the legal framework and calculated approximate costs of prizes offered in such games in Kosovo. The data was obtained through secondary datapoints, including only data accessible online from the publications of the organizers of these games from 2009 to 2023. It should be noted that these do not necessarily include all reward games organized in Kosovo. Only grand prizes promised by businesses, such as housing, vehicles, or cash values over 10,000 euros, are included in the calculation. Whether it is an apartment or a vehicle, award prices are calculated based on the type of prize and the average market price. The apartments are priced at 50,000 euros since neither the size nor the location is known. In contrast, the vehicle prices are calculated based on the price of the vehicle for the year it was promised. In order to provide these data, GAP Institute first contacted over 12 businesses<sup>7</sup>

1 Radio Television of Kosovo (RTK). [Prize games, without legal basis and without control](#). Last accessed January 20, 2024.

2 Sales Force. Customer Loyalty Programs: What Are They? (With Examples). [Why is a customer loyalty program such a key marketing strategy? Here's what you need to know](#). Last accessed January 23, 2024.

3 Ibid.

4 This report focuses primarily on prize games.

5 The Octalysis Group. [Supermarkets can use gamification to combat Inflation](#). Last accessed January 23, 2024.

6 Ibid.

7 Interex, Albi Group, Devolli Corporation, Viva Fresh Sh.p.k, Meridian Corporation, Superviva, Jora Center, Ipko, Elkos Group, Nimi tv, Kastrati Group, Banka Ekonomike.

known to the public for the frequent organization of such games. However, none of these businesses responded to the questionnaire. The report also compares domestic practices with international ones, including European Union (EU) countries, such as Italy and Switzerland, and Western Balkans countries, such as North Macedonia and Serbia.

## (Non)Control of reward games in Kosovo

It has been more than four years that the state of Kosovo has had no control over reward games activity, for which, as long as the Law on Games of Chance was in effect, the Tax Administration of Kosovo (TAK) conducted monitoring. The Law on Games of Chance<sup>8</sup> has been repealed by the Law on the Prohibition of Games of Chance.<sup>9</sup> Until May 10, 2019, based on the repealed Law on Games of Chance, to organize sweepstakes, reward games, and giveaways, businesses were required to obtain permits from the Tax Administration of Kosovo. While after this date, according to an announcement made on TAK's official website, the organization of such games remains the sole responsibility of the businesses. This is without monitoring by state authorities. The government of that time decided to repeal the Law on Games of Chance, which was then materialized with the voting of the new draft law by the majority in the Assembly, aiming to protect citizens from harmful activities such as betting, games of chance, and related events in casinos.

Under the repealed Law on Games of Chance, awarding competitions and reward games were not defined as games of chance. They could be organized provided that participation in the game was not contingent on fees collection.<sup>10</sup> In the repealed Law, prizes from competitions were allowed to be awarded in products, services, or even in cash, but not exceeding 1,000 euros.

Businesses were not required to pay any additional tax for organizing reward games; this is because these expenses were calculated entirely as representation (advertisement/promotion) expenses. Although reward games are not specifically mentioned in the legal framework, businesses may refer to the Law on Corporate Income Tax for such expenses. According to this Law, advertising and promotional expenses are deductible for tax purposes.<sup>11</sup>

With the absence of control over reward game practices, a legal gap has been created in Kosovo which can be used improperly by businesses. If some businesses award prizes in a selective manner and not based on methods that guarantee a random or equally likely selection of winners, they also unfairly benefit from the reduction of tax obligations to the state. This is because reward game expenses are completely deductible, as marketing expenses, so the gap between businesses' revenues and annual expenditure is reduced, and consequently the profit tax they have to pay. At the same time, reward game campaigns positively affect the sales growth of those businesses.

Similarly, for some of the prizes that businesses intend to award in such games, such as vehicles, they must pay Value Added Tax (VAT). However, as a consequence of the lack of direct monitoring by TAK in these activities, there

8 Assembly of the Republic of Kosovo. [Law No.04/L- 080 on Games of Chance](#). Last accessed January 10, 2024.

9 Assembly of the Republic of Kosovo. [Law No. 06/L-155 on the Prohibition of Games of Chance](#). Last accessed February 12, 2024.

10 Ibid. "The awarding competitions and the awarding Games that are organized by the juristic entity with propagandistic aims are not considered Games of Chance according to this Law, but they can be organized, on condition that the participation in the game is not paid extra, that the award be given in products or services, and that the rules of the game be published in the daily press according to the permission of the Ministry of Economy and Finance."

11 Assembly of the Republic of Kosovo. [Law No. 05/L-029 on Corporate Income Tax](#), Article 11. Last accessed December 23, 2024.

are cases where vehicles or other amenities that are later awarded as prizes, are initially purchased as company assets to be used for business purposes.<sup>12</sup> This is because according to the Law on Value Added Tax and the supplementary legal basis, vehicles used for business purposes are exempt from VAT.<sup>13</sup>

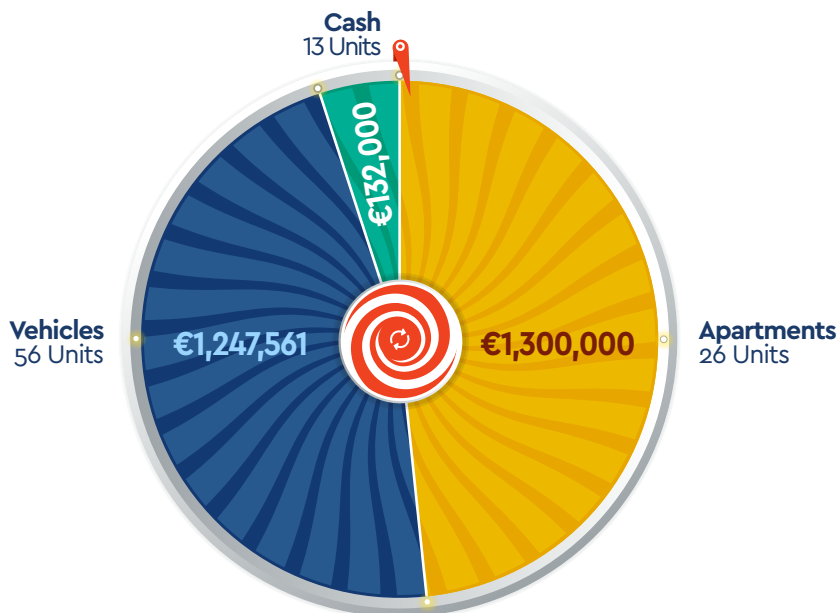
Due to the lack of monitoring of these games, TAK finds it difficult to identify winners, who also must pay income tax on any winnings.<sup>14</sup> Consequently, state revenues are negatively affected in several aspects by this legal loophole.

## Prize games in Kosovo: Award calculations

According to GAP Institute calculations, based on open source online data, during 2009–2023, pledges for major prizes reached about 2.7 million euros. These prizes include housing, vehicles, and cash. Compared to the period when TAK monitored reward games, after 2019, pledges of prizes for customers multiplied by 16 times. The value of the prizes was 12 times higher. From these online accessible data, 26 apartments worth 1.3 million euros,<sup>15</sup> 56 vehicles worth 1.2 million euros, and 12 cash prizes valued at 132 thousand euros have been identified. At the moment, just one of the big businesses is running a prize game with more than 150 awards, worth more than 100,000 euros.

Businesses pledge vehicles from different brands such as Range Rover, BMW, Volkswagen, and Renault, among others. GAP Institute has also come across other prizes such as phones worth over one thousand euros, various cash amounts, TV sets, scooters, various electronic devices among other products. However, such items are not included in the calculation as they do not exceed the value of 10,000 euros per unit.

**Figure 1.** Number and value of total prizes (2009–2023)



Source: GAP Institute based on online business data

<sup>12</sup> From communication and discussions with prize game subject matter experts in Kosovo.

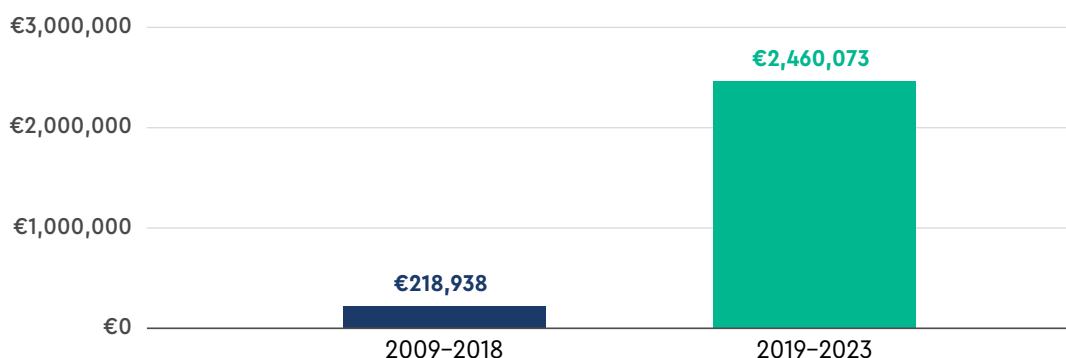
<sup>13</sup> Ministry of Finance. [Administrative Instruction \(MoF\) No. 03/ 2015 for Implementing Law No. 05/I-037 on Value Added Tax](#), Article 56.4.

<sup>14</sup> [Law No. 05/I -028 on Personal Income Tax](#), Article 14.

<sup>15</sup> Note: The value of residential apartments is estimated at 50,000 euros calculated based on an average from the real estate market.

From the analyzed data, from 2009 to May 2019, fewer reward games were organized, while from 2019 to 2023, reward games were much more frequent (the exception here is 2020). This may also be due to the repeal of the law and the wider use of the Internet and social media in recent years. This has made information dissemination much easier. The 2009–2018 period includes games organized in 2009, 2016, 2017, and 2018. The analysis includes 2009 as it is the first year with a reward game featuring a vehicle as the grand prize. While from 2009 until 2016, we do not encounter any reward games with prizes exceeding 10,000 euros, at least from online information.

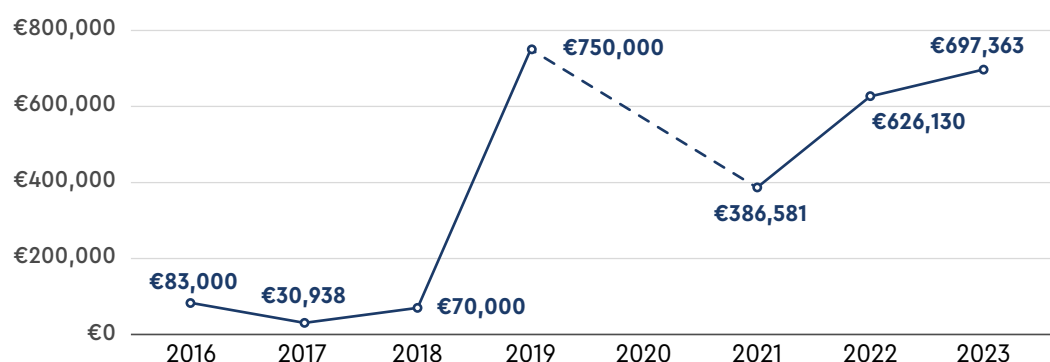
**Figure 2.** Value of prizes before and after the repeal of the Law on Games of Chance (2009–2023)



Source: GAP Institute based on online business data

A high total value of prizes was pledged during 2019; more specifically, 15 apartments worth a total of around 750,000 euros were pledged. A year later, in 2020, during the time the country was facing the economic consequences of the COVID-19 pandemic, the prizes mainly constituted cash worth less than 10,000 euros, although many in number. In 2022, prize games with a total value of more than 626,000 euros were organized: 48% of this value was pledged to housing, 36% to vehicles, and the rest in cash. The facilitation and removal of prior approval by TAK may have also affected the organization of more reward games since 2019. From 2019, businesses are free to organize their prize games however they choose,<sup>16</sup> so most businesses legitimately choose not to disclose prize awards.

**Figure 3.** Value of prizes, by year (2016–2023)



Source: GAP Institute based on online business data

<sup>16</sup> Tax Administration of Kosovo. Notice to Taxpayers – [TAK does not provide prior approval for prize games](#). Last accessed January 24, 2024.

From the analysis of all the games presented in the report (2009–2023), it has been found that more than half of the grand prizes (54%) to be awarded have been disclosed to the public. In these cases (54%), businesses have made public the drawing of the name of the prize winner through coupons. This is either through live events broadcast on national television or social media, or by using some formula that randomly selects the winners. This practice increases the confidence of the players. Despite the lack of transparency in awards, consumers do not address their dissatisfaction or doubts. According to the Consumer Protection Department at the Ministry of Industry, Entrepreneurship, and Trade, from 2013 when this department started accepting complaints, 12 complaints were received on loyalty program points and only one complaint on prize games.<sup>17</sup> The first complaint was received in 2021, six complaints in 2022, and the rest in 2023.

## Customer reward practices in European Union and Western Balkans countries

In European Union countries, businesses offer rewards and perks to customers mainly through loyalty programs, but not necessarily through reward games. Over 61% of customers in Europe are part of such programs, reaching over 80% in countries such as Norway and Sweden. Even in countries with low participation, such as Turkey and Romania, membership in loyalty programs remains above 30%.<sup>18</sup> One of the most common ways to reward customers is through loyalty cards. This is where customers receive points for every purchase and can redeem them for discounts on future purchases, a practice that increases customer loyalty. Also, business strategies to attract customers include special offers and discounts on certain products. Their periodic catalogs and announcements notify customers of current offers and savings opportunities. These loyalty programs in EU countries are required to be implemented in accordance with the General Data Protection Regulation (GDPR)<sup>19</sup> which has been in effect since May 25, 2018. This legal act provides a series of obligations for privacy protection and the use of personal data. It requires compliance with the rules as well as approval for their processing.<sup>20</sup>

In Italy, loyalty programs are regulated by the Italian Competition Authority (Autorità Garante della Concorrenza e del Mercato). This authority ensures fair and transparent practices, protects customers' rights, and prevents money laundering.<sup>21</sup> To organize a loyalty program, businesses only pay taxes on the value of rewards they award to their customers.<sup>22</sup> Rewards are considered taxable supplies of goods or services and subject to VAT at the applicable rate. In Italy, loyalty programs are considered marketing expenses for businesses, and they can claim deductions up to a certain percentage of their taxable income. More precisely, the deduction is limited to 10% of marketing expenses and cannot exceed 2% of annual profit.<sup>23</sup> While businesses that organize games of chance, such as lotteries or bets, pay a special tax rate. This varies depending on the type and value of the reward.

17 Correspondence between GAP Institute and the Consumer Protection Department at the Ministry of Industry, Entrepreneurship, and Trade, December 2023.

18 Mando Connect. [Understanding the Loyalty Landscape in Europe White Paper](#). Last accessed January 24, 2024.

19 [General Data Protection Regulation](#). Article 26. Last accessed January 23, 2024.

20 OCI- General Data Protection. [Protecting Personal Data](#). Last accessed January 24, 2024.

21 Research and Markets. [Italy Loyalty Programs Market Intelligence and Future Growth Dynamics Databook](#), 2024. Last accessed February 13, 2024.

22 Agenzia Entrate, Ministry of Finance and Economy. [VAT in Italy](#). Last accessed February 13, 2024.

23 Ibid.



Switzerland regulates rewarding customers through loyalty programs, where businesses must navigate through various legal aspects to ensure fair and transparent practices. Loyalty programs are governed by consumer protection laws, contract law, and data protection regulations. These programs are categorized as marketing expenses and fall under VAT-deductible expenses since they are used for business development purposes. In most cases, players and operators of such games are under the supervision and authorization of regulatory authorities, such as the Swiss Federal Gaming Board. While the legal framework includes games of chance as part of betting games regulation. Games of chance include any activity where participants wager a certain amount of money or other known value for the chance of winning a prize or other monetary gain. The Regulation specifies a large number of rules and restrictions on games of chance. These include obligations of gaming organizers regarding social responsibility, anti-money laundering measures, and restrictions on advertising and promotion. Games of chance laws and regulations are limited only to betting games, but not to loyalty programs. This is unless customer loyalty programs are applied by game organizers.<sup>24</sup>

In North Macedonia, rewarding customers in games of chance and entertainment games is regulated through the Law on Games of Chance and Entertainment Games.<sup>25</sup> Some of the key points of this law are definitions of games, types of games, and legal procedures for organizers. In the case of entertainment games, the organizer may also be an individual business/person, subject to licensing by the Ministry of Finance.<sup>26</sup> Award games are games of chance organized by one or more businesses to advertise products and services.<sup>27</sup> These games are organized in different ways such as by electronic means via mobile devices, the Internet, public announcements. Winners must receive product or service awards, cash, or rights, depending on what has been proposed as a prize by organizers. The fee for the organization of the games is 18% of the prize fund value, paid upfront before the games are organized.<sup>28</sup> If several companies appear jointly as organizers of the reward game, the fee is divided between the organizers equally by prior agreement. Game terms must be published in local newspapers, and the winners must be announced within three days. Any game iteration cannot exceed one year.<sup>29</sup> The law stipulates that for any matter not covered, the Law on General Administrative Procedure shall apply.<sup>30</sup> In addition, from 2023 prize game winners in North Macedonia must pay 15% income tax on their winnings.<sup>31</sup>

24 ICLG – [Gambling Laws and Regulations](#). Last accessed January 24, 2024.

25 Assembly of the Republic of North Macedonia. [Law on Games of Chance and Entertainment Games](#). Last accessed January 17, 2024.

26 Ibid.

27 Ibid.

28 Assembly of the Republic of North Macedonia. Law on Games of Chance and Entertainment Games. Article 129. Last accessed January 23, 2024.

29 Assembly of the Republic of North Macedonia. [Law on Games of Chance and Entertainment Games](#). Article 126. Last accessed January 23, 2024.

30 Assembly of the Republic of North Macedonia. [Law on Games of Chance and Entertainment Games](#). Last accessed January 23, 2024.

31 Telegrafi. [New tax law in Macedonia provides tax hikes for some activities](#), 2023. Last accessed January 23, 2024.

Serbia does not have specific laws dedicated to loyalty programs. Nevertheless, businesses must navigate through various legal aspects to ensure fair and transparent practices. This is the case in Serbia because games of chance are legal.<sup>32</sup> Serbian businesses may set up loyalty programs without a mandatory fee. However, they must comply with consumer protection laws, privacy regulations, and advertising/marketing guidelines. Unless specific exemptions or rules apply, marketing expenses in Serbia are treated as regular business expenses and subject to standard taxation rates. Unlike other countries, Serbia has a website, although not official, where all active reward games are posted. The prize winners are also shown.<sup>33</sup>

In Albania, the Law on Games of Chance governs reward (promotional) games.<sup>34</sup> According to this law, a "promotional game of chance" is a game that promotes products or services, in which participants compete for prizes or bonuses. In these cases, the Minister of Finance in Albania grants authorization to public or private entities to organize promotional games of chance, through the sale and trading of goods or in any other way during the performance of their activity, for promotional effects or publicity of the goods. The ways, forms, criteria, and additional rules for the organization of promotional games of chance are determined by the Council of Ministers.<sup>35</sup> These games are then monitored and controlled by the Games of Chance Monitoring Unit.<sup>36</sup> According to one of the decisions of the Council of Ministers, promotional games of chance may be organized by the organizers offering the product/service to be promoted for free, offering the product/service at the sale price together with a coupon, a ticket, the opportunity to scratch in the packaging of the purchased product, or in any other way, provided by the organizer, but without additional costs for the customer.<sup>37</sup> To obtain authorization, the organizers of the promotional games of chance must pay a fee of 200,000 lek (1,939 euros) in advance.<sup>38</sup> These revenues are deposited 100% into the Albanian national budget.<sup>39</sup> Regarding the obligations of the winners of these games, according to the general guidance on income tax, income from gifts, inheritances, and games of chance received in the Republic of Albania by residents and non-residents is taxed at 15% without deducting any costs.<sup>40</sup>

In Montenegro, customer rewards are mainly applied through loyalty programs, which are not legally regulated. While the Law on Games of Chance governs games of chance activities such as lotteries, betting, and bingo, for which a license is required.<sup>41</sup>

32 Assembly of the Republic of Serbia. [Law on Games of Chance](#). Last accessed February 12, 2024.

33 [NagradneigreRS.com](#)

34 Official Gazette of the Republic of Albania. [Law No. 155/2015 on Games of Chance in the Republic of Albania](#) (amended by Law No. 140/2016, dated 12/22/2016, No. 75/2018, date 10/25/2018. Last accessed March 20, 2024.

35 Ibid.

36 Ibid.

37 Games of Chance Monitoring Authority. [Decision on the ways, means, criteria, and rules for the organization of promotional games of chance](#), Official Gazette No. 55, dated 03/22/2017. Last accessed March 20, 2024.

38 Ibid.

39 Ibid.

40 General Guidance No. 26, dated 09/08/2023 on Income Tax

41 [Law and Practice in Montenegro](#). Last accessed March 21, 2024.

## Conclusions and recommendations

































To drive purchases and increase customer participation, businesses use various strategies such as price discounts, reward games, and loyalty programs. However, this phenomenon has not been regulated by the legal framework in Kosovo since 2019, unlike previous years when the Tax Administration controlled this activity. Similar to European Union countries, businesses in Kosovo organize loyalty programs and reward games. However, what differs from practices in these countries is the more frequent offering of prizes such as residential apartments or vehicles. Until May 2019, there were fewer reward games organized. From July 2019 to 2023 reward games are more prevalent, with the exception of 2020. This may have been due to the repeal of the law on games of chance and the wider use of the Internet and social media in recent years, making information dissemination much easier.





In some Western Balkans countries, such as North Macedonia or Albania, reward games are regulated legally. In North Macedonia, to organize a prize game, a business must pay the fee for organizing the prize game, at 18% of the total prize fund value. While in Albania, organizers have to pay nearly 2,000 euros. In countries outside the Western Balkans, loyalty programs are used to reward customers. In this context, loyalty programs are considered marketing expenses for businesses, and they can claim deductions up to a certain percentage of their taxable income.

In support of customer protection, GAP Institute recommends that public institutions, such as TAK, should take measures to prevent businesses from exploiting legal gaps by organizing reward games to pay lower taxes or show favoritism in awards to certain individuals. At the same time, loyalty programs must be monitored, to ensure that they award points and perks properly. To address this issue, it is important that within the framework of existing laws, regulations, or by decision, a control mechanism should be established to specify the conditions, rules, and restrictions for reward games, including the obligations of organizers, anti-money laundering measures, financial reporting forms, and advertising and promotion restrictions. Overall, the implementation of the game, loyalty programs, and awards should be monitored, ensuring a transparent and accountable process. Also, it is extremely important to introduce limits on reward game expenses declaration by businesses. Through these changes and the implementation of appropriate control mechanisms, the legitimacy of such games and loyalty programs would be improved. This would ensure a more orderly and fairer environment for all involved actors.

# Appendices

## Appendix 1. Reward Games in Kosovo

Prize	Approximate Price per Unit	Unit	Total
<a href="#">Vehicle</a> 	€35,000.00	1	€35,000.00
<a href="#">Vehicle</a> 	€20,000.00	1	€20,000.00
<a href="#">Vehicle</a> 	€63,000.00	1	€63,000.00
<a href="#">Vehicle</a> 	€30,938.00	1	€30,938.00
<a href="#">Vehicle</a> 	€20,000.00	1	€20,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Apartment</a> 	€50,000.00	15	€750,000.00
<a href="#">Vehicle</a> 	€25,000.00	1	€25,000.00
<a href="#">Vehicle</a> 	€40,000.00	1	€40,000.00
<a href="#">Vehicle</a> 	€26,527.00	3	€79,581.00
<a href="#">Vehicle</a> 	€7,000.00	1	€7,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Vehicle</a> 	€25,000.00	3	€75,000.00
<a href="#">Vehicle</a> 	€20,000.00	3	€60,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Cash</a> 	€100,000.00	1	€100,000.00
<a href="#">Vehicle</a> 	€16,129.82	1	€16,129.82
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Vehicle</a> 	€25,000.00	3	€75,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Vehicle</a> 	€15,000.00	5	€75,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Vehicle</a> 	€20,000.00	3	€60,000.00
<a href="#">Cash</a> 	€10,000.00	1	€10,000.00
<a href="#">Cash</a> 	€2,000.00	10	€20,000.00
<a href="#">Vehicle</a> 	€20,000.00	2	€40,000.00
<a href="#">Vehicle</a> 	€15,000.00	5	€75,000.00
<a href="#">Vehicle</a> 	€15,000.00	1	€15,000.00
<a href="#">Vehicle</a> 	€15,000.00	1	€15,000.00
<a href="#">Vehicle</a> 	€15,000.00	1	€15,000.00

Prize	Approximate Price per Unit	Unit	Total
<a href="#">Vehicle</a> 	€15,000.00	1	€15,000.00
<a href="#">Vehicle</a> 	€8,399.00	1	€8,399.00
<a href="#">Vehicle</a> 	€26,527.00	1	€26,527.00
<a href="#">Vehicle</a> 	€26,527.00	1	€26,527.00
<a href="#">Vehicle</a> 	€20,000.00	1	€20,000.00
<a href="#">Vehicle</a> 	€8,909.00	1	€8,909.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Cash</a> 	€2,000.00	1	€2,000.00
<a href="#">Vehicle</a> 	€15,000.00	4	€60,000.00
<a href="#">Apartment</a> 	€50,000.00	1	€50,000.00
<a href="#">Vehicle</a> 	€20,000.00	1	€20,000.00
<a href="#">Vehicle</a> 	€70,000.00	1	€70,000.00
<a href="#">Vehicle</a> 	€20,000.00	3	€60,000.00
<a href="#">Vehicle</a> 	€45,000.00	1	€45,000.00
<a href="#">Vehicle</a> 	€45,000.00	1	€45,000.00



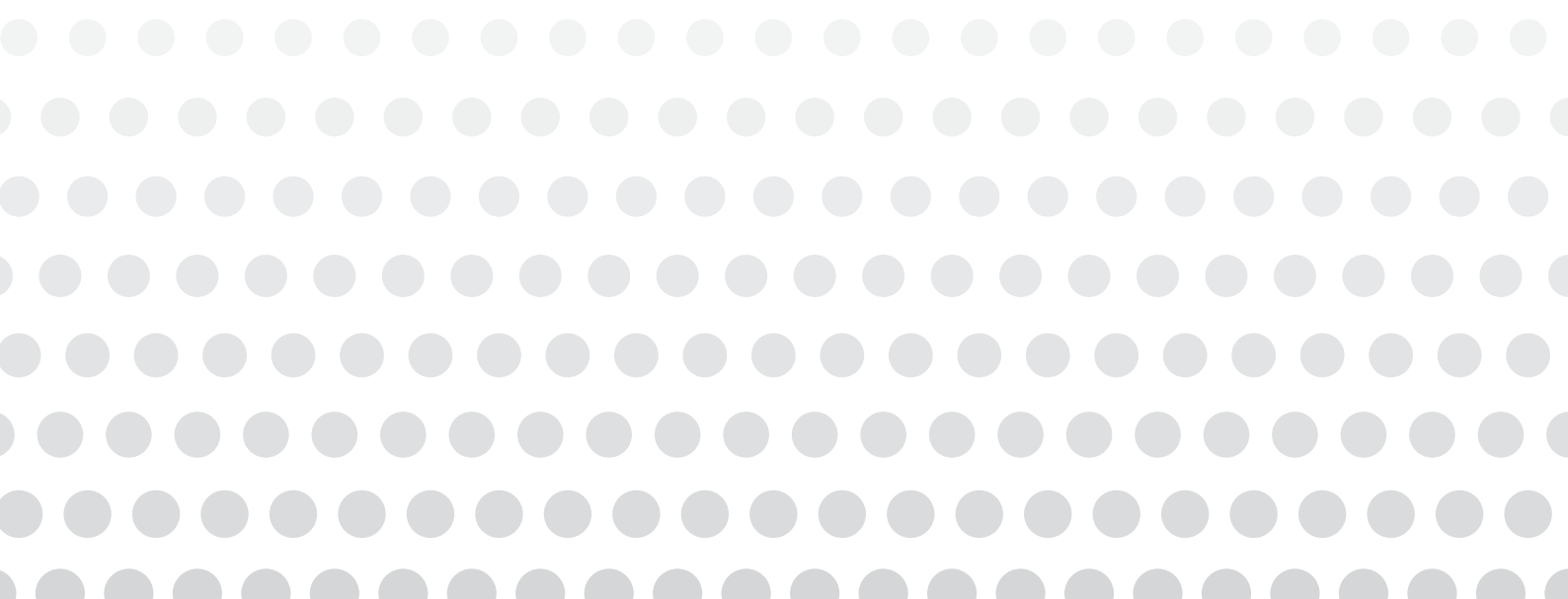
GAP Institute is a Think Tank established in October 2007 in Kosovo. GAP's main goal is to attract professionals to create an environment of professional development and research, as seen in similar institutions in Western countries. This also provides Kosovars with opportunities to research, develop and implement projects in order to advance the Kosovo society. Priority for this Institute is the mobilization of professionals to address the country's economic, political and social challenges. GAP's main goals are to fill the gaps between government and citizens, and between problems and solutions.

[www.institutigap.org](http://www.institutigap.org)

Sejdi Kryeziu, Blloku 4, Nr. 4, 10000 Prishtina

Tel.: +383 38 609 339

[info@institutigap.org](mailto:info@institutigap.org)



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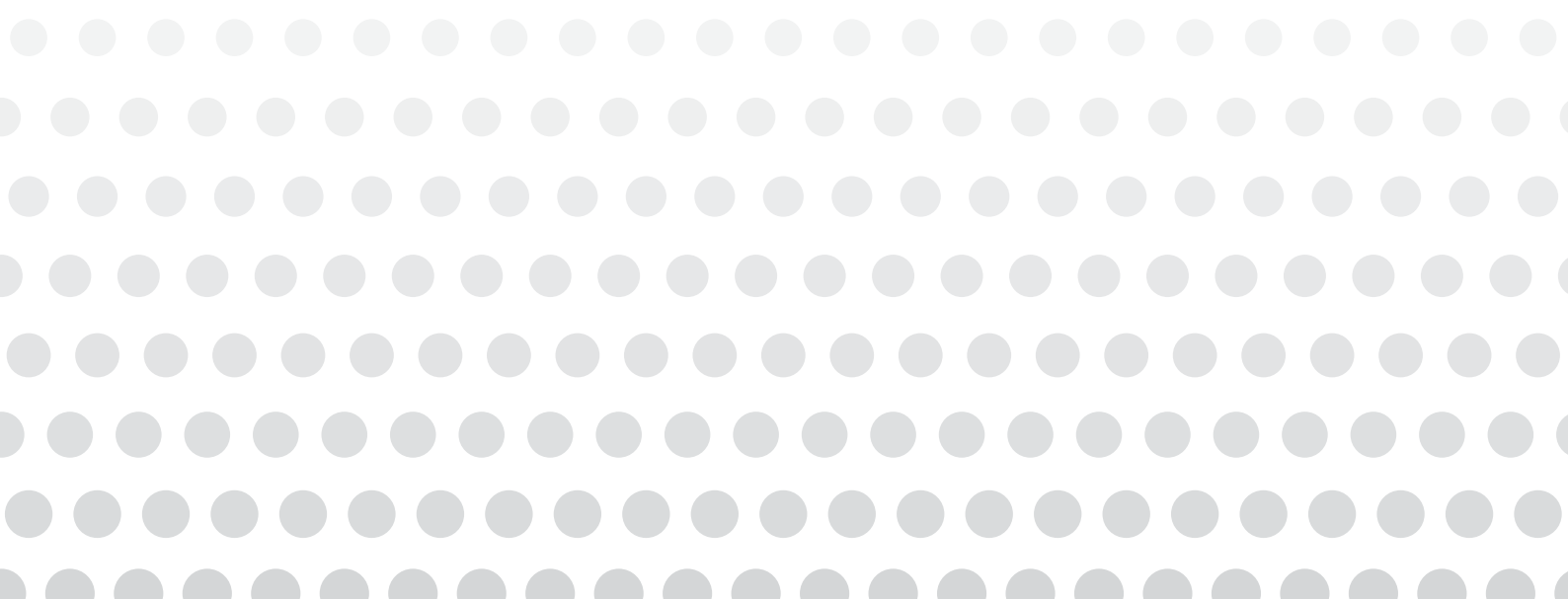


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**Reward games**  
in Kosovo in absence  
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