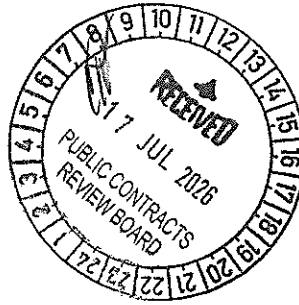




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ADVOCATES



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17 July 2026

ATTN: The Secretary
Public Contracts Review Board
Notre Dame Ditch
Floriana

By e-mail

Reasoned Letter of Objection

Re: CT2271/2025 – Supply of Interferon Beta-1A 30 Micrograms Solution for Injection

Dear Sir, Madam,

1. Introduction

- 1.1. We are instructed by Pharma.MT Limited (C 42603) bearing Tender ID number 236981 (hereinafter referred to as the “Applicant”) in connection with the Tender Procedure published by the Department of Contracts with the final beneficiary being the Central Procurement and Supplies Unit (the “Contracting Authority”).
- 1.2. In accordance with the Public Procurement Regulations, 2016 (S.L. 601.03) (“PPR”), our client hereby submits the reasoned application in terms of Regulation 270 (Appeals from decisions taken after the closing date for the submissions of an offer) for the reasons set out hereunder (this “Application”).
- 1.3. Enclosed with this application is evidence of payment of the deposit required to be paid in terms of 273 of the PPR paid to the Public Contracts Review Board (the “Board”).

2. Facts

- 2.1. The tender document governing the Tender Procedure (the “Tender Document”) was published by the Contracting Authority on the 11 November 2025, with the closing date being the 15 December 2025.

Partners: Louis de Gabriele; Mariya Vella, Malcolm Falson; Ron Galea Cavallazzi, Donald Vella, Steve DeCesare, Andrei Vella, Andrew Caruana, Seidman, Kirsten Debono Haskinson, Kristina Rapa Manché

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- 2.2. The Estimated Procurement Value for this Tender Procedure as set out in article 1.3 of the Tender Document is that of €3,648,750.00 excluding VAT.
- 2.3. The supply of the products was for a period of thirty-six (36) months, with an option for a further extension of six (6) months. In addition, the estimated quantity was circa 21,000 units over the three (3) year fixed period.
- 2.4. In terms of article 3 of the Tender Document, the tender is not divided into lots. The justification provided for this is that the Tender Procedure is for the supply of only one type of medicine and thus is to be supplied by one contractor throughout the contract period.
- 2.5. The Tender Document requested the supply of Interferon Beta-1A 30 micrograms Solution for Injection (bearing the S-Code J157) and the product specifications section divides said specifications into two: (i) Functional specifications ("Interferon") which the Contracting Authority lists as Optional requirements, and (ii) three Technical Specifications (described as "Interferon beta-1A 30 micrograms (6 million IU) solution for injection", "in prefilled pen", and "for IM use" respectively) which the Contracting Authority lists as Mandatory requirements.
- 2.6. These mandatory technical specifications relate to the type of interferon being procured (in this case 'beta 1A'), the applicable unit of measurement (30 micrograms or 6 million IU), and the method of administration (administered by way of intramuscular injections in pre-filled pens).
- 2.7. Apart from the product specifications described above, economic operators were asked in Section 3 – Specifications, to demonstrate, by means of a statement and confirmation to that effect, that the product being proposed in their relevant technical offer complies with the other technical specifications (listed in paragraph 1.2).
- 2.8. Furthermore, the Tender Document also obliged economic operators to submit further technical documentation online through the prescribed Tender Response Format, which for the purposes of medicinal products such as the ones being procured in this Tender Procedure, consists of a summary of the product characteristics (SPC) of the medicinal product being offered in one of the official languages of Malta.
- 2.9. The Applicant adhered to the requirement described in the previous paragraph 2.8 by submitting the SPC for the medicinal product namely AVONEX 30 micrograms/0.5 ml solution for injection. The Applicant opted to submit this particular product given that



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Pharma.MT Limited holds the exclusive right to distribute the product in Malta as granted by its producer Biogen.

- 2.10. Apart from the technical requirements stipulated in Section 3 – Specifications in the Tender Document, economic operators were also tasked with demonstrating compliance with the Selection Criteria requirements in Section 1 – Instructions to Tenderers, by completing Part IV titled 'Selection Criteria', which included the following components:
 - 2.10.1. *suitability* – wherein economic operators were requested to demonstrate their enrolment in a relevant professional register being the register of licensed pharmaceutical wholesale dealers in Malta;
 - 2.10.2. *economic and financial standing* – wherein economic operators were requested to demonstrate their average yearly turnover during the past 3 years (being 2022-2024) of not less than one million two hundred thousand (€1,200,000.00) per year;
 - 2.10.3. *technical and professional ability* – wherein economic operators were being requested to provide data concerning subcontractors and the percentage of works through the relevant part in the online ESPD form; and
 - 2.10.4. *quality assurance schemes and environment management standards* – which was not applicable in this case.
- 2.11. The pre-populated ESPD questionnaire in the relevant queries related to the 'Economic and financial standing' of the interested economic operators, cited Article 58(3) of Directive 2014/24/EU and asked bidders to tick the relevant box declaring that they exceeded the minimum requirement of €1,200,000 average yearly turnover over the preceding 3 fiscal years (2022-2024).
- 2.12. The ESPD did not require economic operators to demonstrate their compliance with the economic and financial standing selection criteria by attaching the relevant accounts or financial statements of the corresponding financial years.
- 2.13. Obliging tenderers to back up their Y/N declarations of compliance (with the minimum annual average turnover requirement in this case) by submitting accounts or financial statements is considered normal practice in other tender procedures for supplies, works, or services with comparable estimated procurement values.
- 2.14. In paragraph 6 of Section 1 – Instructions to Tenderers ('Criteria for Award'), the Tender Document prescribed that the sole award criterion was the price, and the Contracting Authority further stipulated that the contract will be awarded to the tenderer submitting the cheapest priced offer satisfying the administrative and technical criteria.



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- 2.15. On the 07 July 2026, the Department of Contracts on behalf of the Contracting Authority, communicated its letter of rejection to the Applicant and based its refusal on the fact that the tender submitted by the Applicant was not successful since the criteria for the award of this tender was the cheapest priced offer satisfying the administrative and technical criteria.
- 2.16. In the same letter of rejection (annexed and marked as 'Doc. PML1'), the Contracting Authority communicated to the Applicant that the tender was recommended for award to *"TID 236991 Pharma Regulatory Services Limited for the amount of €3,324,405.00 excluding VAT, this being the cheapest priced tender satisfying the administrative and technical criteria."*
- 2.17. On the 08 July 2026, the Applicant sent a letter with a request for information (annexed and marked as 'Doc. PML2') to the Department of Contracts with four queries, which are being reproduced hereunder:
- (a) *"Firstly, did the tenderer rely on third parties for the purposes of its tender and, if in the affirmative, please provide name(s) of third party(ies) and the capabilities relied upon for each third party?"*
 - (b) *"Secondly, did the tenderer appoint any subcontractors for the purposes of its tender and, if in the affirmative, please provide name(s) of subcontractor(s) and the capabilities relied upon for each subcontractor?"*
 - (c) *"Thirdly, did the Recommended Tenderer submit audited financial statements for the past three (3) years (being 2022-2024) showing a minimum average yearly turnover during the said period of not less than €1,200,000 per annum?"*
 - (d) *"Fourthly, did the Department of Contracts request samples of the product or mock-up and package insert."*
- 2.18. The Department of Contracts replied, via e-mail, on the 13 July 2026 (annexed and marked as 'Doc. PML3') to the four queries listed in the previous paragraph, and provided such information in response to the letter with the request for information, as follows:
- 1. *"There seems to be no information whether the recommended tenderer relied on third parties for the purposes of the tender on ESPD."*



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2. *No subcontractors appointed (it was left empty) Clause 5B(c) of section 1 of tender document states: " It is being understood that if the information being requested regarding sub-contracting is left empty, it will be assumed that no sub-contracting will take place (0% subcontracting).*
3. *No financial requested audited accounts are requested by the tender.*
4. *No samples requested by TEC."*

3. First Grievance: the Contracting Authority cannot ascertain that the Recommended Bidder complies with the economic and financial standing selection criteria or otherwise

- 3.1. The Recommended Bidder (Pharma Regulatory Services Limited), according to the 'About Us' section in its own website (annexed and marked as 'Doc. PML3'), is described primarily as a regulatory affairs consultancy company positioning itself as a service-provider to the cosmetic, in vitro diagnostic, medical device, and pharmaceutical industries in Malta.
- 3.2. From its establishment in 2015 to 2021, it operated solely as a regulatory affairs consultancy firm and advertised itself as a bridge between "*manufacturers, distributors, and importers*" and the "*regulatory authorities*" by providing the former "*with the expertise and support necessary to meet the stringent regulatory standards set forth by*" the latter.
- 3.3. From the information available on the Recommended Bidder's website, Pharma Regulatory Services Limited only obtained its medicinal broker license in 2021, its wholesale dealer license in 2022, whilst in 2023 it was also granted an import license. Notwithstanding this, there is no publicly available information that corroborates the activities of pharmaceutical brokering, wholesaling and importation.
- 3.4. The financial position of the Recommended Bidder is likewise murky and not discernable from the publicly accessible trade registers that should contain a clear and unequivocal snapshot of the economic and financial standing of Pharma Regulator Services Limited ("PRSL").
- 3.5. From a review of PRSL's page on the Malta Business Registry (Business Automation Registry Online System), specifically the 'Documents' sub-section (annexed and marked as 'Doc. PML4'), it is evident that PRSL has failed to file its annual accounts since 2022, which corresponds with the year in which PRSL obtained its wholesale dealer license.
- 3.6. Therefore, given that it was not obligatory to submit accounts in support of the figures cited in the ESPD questionnaire, the Contracting Authority had to rely solely on the subsequent



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question in the same ESPD questionnaire which is being fully reproduced below for ease of reference:

"Is this information available at no cost to the authorities from an EU Member State database?"

☐ Yes

☐ No

URL

-

Reference/Code

-

Issuer"

- 3.7. If the Recommended Bidder chose the option 'Yes', then this was a flagrantly false declaration made within the ESPD, and it should have been incumbent on the Tender Evaluation Committee (TEC) of the Contracting Authority to verify the veracity of that statement by accessing the MBR's BAROS system. Failure to double-check this self-declaration gives rise to serious doubts about the completeness and integrity of the evaluation process.
- 3.8. On the other hand, if the Recommended Bidder chose the option 'No', it would therefore be impossible for the Tender Evaluation Committee (TEC) to verify the truthfulness of the figures cited in the ESPD self-declaration, which would mean that the TEC relied on the numbers proposed by the economic operator blindly and without any recourse to evidence that could corroborate said submission.
- 3.9. Therefore, in both scenarios it would seem that the TEC failed to adhere to the minimum standards required from evaluation panels representing the public administration to ensure adequate levels of completeness of information, and the conclusions of the evaluation panel was manifestly vitiated by an abdication of the TEC's role to investigate the correctness of the same submissions they should be evaluating.
- 3.10. These principles of good administration were enshrined in the Court of Appeal judgement in the names '*Bessui JV v. Dipartiment tal-Kuntratti Et*'¹ dated the 15 January 2026, wherein

¹ Appell Numru 379/2025/1 – Court of Appeal (Superior)



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Advocates & Solicitors

the Court in an analogous argument explained that TECs cannot turn a blind eye and rely on self-declarations:

“69. Din il-Qorti kwazi xebgħet tghid li meta r-regolamenti tas-sejha jitolbu b’mod espress ċertu tip ta’ dokumentazzjoni, dik id-dokumentazzjoni għandha tingħata bil-mod ta’ kif ikun mitlub, u dan irrispettivament minn jekk l-offerent jidhirlux li dik id-dokumentazzjoni tkunx ta’ siwi għall-kumitat tal-għażla jew le (ara All Clean Services Limited v. Ministeru għall-Edukazzjon, l-Ispport, iż-Żgħażaġġ, ir-Riċerka u l-Innovazzjoni et mogħtija mill-Qorti tal-Appell fit-10 ta’ Jannar, 2023). Tassew, ir-regoli tas-sejha jsiru biex jitharsu u mhux biex kulhadd jagħmel kif ifettillu! (ara Legacy Ventures Limited v. Direttur Ġenerali tal-Kuntratti et mogħtija mill-Qorti tal-Appell fit-30 ta’ Lulju, 2024).

70. Taqa’ għalhekk fir-responsabbiltà ta’ kull offerent li jobdi l-kundizzjonijiet tas-sejha bħala «a reasonable well informed and normally diligent tenderer», u għaldaqstant, għaladarba r-regoli tas-sejha inkwistjoni kienu jimponu fuq l-offerenti li jressqu kopja tal-istandards rilevanti, il-kumpanija appellanti kienet obbliga li tressaq dik id-dokumentazzjoni, u mhux tippretendi li setgħet tghaddi mingħajrha (ara Vassallo Builders Ltd v. Wasteserv Malta Ltd et mogħtija mill-Qorti tal-Appell fis-6 ta’ Mejju, 2025 u Trackwell FIMS noe v. Id-Direttur Ġenerali tal-Kuntratti et mogħtija mill-Qorti tal-Appell fit-13 ta’ Marzu, 2025).

71. Bl-istess mod, il-kumitat ta’ evalwazzjoni ma setax jagħlaq għajnejh għan-nuqqas tal-ghotja ta’ tali dokumentazzjoni, u dan billi daqskemm l-offerenti għandhom joqogħdu attenti li jipprezentaw dak kollu li jkun intalab minnhom fid-dokumenti tas-sejha, daqshekk iehor li daww mgħobbija bir-responsabbiltà li jgħarblu l-offerti għandhom jiżguraw li jimxu bir-reqqa mal-kundizzjonijiet li jitniżžu fid-dokument tas-sejha (ara Signal 8 Security Services Malta Limited v. Environment and Resources Authority mogħtija mill-Qorti tal-Appell fit-3 ta’ Settembru, 2024).

72. Dan għaliex, meta fil-kuntest ta’ proċedura ta’ sejha għall-offerti, l-awtorità kontraenti tfassal il-kundizzjonijiet li bi hsiebha timponi fuq l-offerenti, hija tkun qiegħda tillimita l-eżerċizzju tas-setgħa diskrezzjonali tagħha bil-quddiem — b’dana li hija ma tkunx tistax tmur lura mill-kundizzjonijiet tas-sejha, mingħajr ma tikser il-prinċipju tat-trattament indaqs bejn l-offerenti (ara Polaris Marine Services Co Ltd v. Direttur Ġenerali tal-Kuntratti et mogħtija mill-Qorti tal-Appell fit-29 ta’ Awwissu, 2023, u Quattro Labs Limited pro et noe v. Malta College of Art, Science and Technology mogħtija mill-Qorti tal-Appell fit-13 ta’ April, 2018).



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73. *Galadarba l-awtorità kontraenti talbet lill-offerenti b'leż jispjefikaw l-istandards li għalihom l-impjanti tal-enerġija kienu sejrin ikunu konformi magħhom, kif ukoll jipprezentaw kopja ta' daww l-istandards rilevanti (għalfejn fil-każ tal-istandards ISO, IEC, EN, BS u HD), il-kumitat ta' evalwazzjoni kien għalhekk obbligat jiżgura li l-offerenti jkunu ssottomettew dik l-informazzjoni u d-dokumentazzjoni, u mhux jiddeċiedi minn rajh li joqghod biss fuq id-dikjarazzjonijiet magħmula mill-offerenti fil-formola dwar l-offerta teknika."*

- 3.11. Since the ESPD questionnaire, as integrated in the Tender Response Format, asked economic operators to indicate whether the information (in this case the average annual turnover) could be discernable from a database which is accessible to the Contracting Authority, it goes without saying that the Tender Document did not intend to rely solely on the figures inputted by participants in the Tender Procedure, and wanted another layer of comfort.
- 3.12. The Public Contracts Review Board, in case 2143 dated the 1st September 2025², anchored its decision to overturn the TEC's original decision by citing the "duty of vigilance", which in its considerations it explained as the counter-weight to the doctrine of self-limitation³.
- 3.13. The Board delivered the following considerations, which the Applicant argues are pertinent to the case at hand:

"In the grand scheme, these principles are all one breath, i.e. the TEC, or any Contracting Authority, cannot delegate away its duty to stay alert. Public procurement isn't a passive exercise. In the opinion of this Board, the committee must monitor, question, and act when circumstances warrant, even if ultimate action (like exclusion) lies with another body, such as the Director of Contracts.

In the present case, the insider trading sanction was not an extraneous matter; it was, in the opinion of this Board, directly relevant to the exclusion ground of "grave professional misconduct", which was expressly provided in the ESPD. Nor was vigilance tantamount to "independent research". The information was publicly disclosed in annual reports and filings of the parent company, documents ordinarily reviewed in due diligence and accessible through routine verification. In other words, the insider trading sanction against the parent company was not a peripheral or collateral matter. It was directly pertinent to

² Case 2143 CT3026/2024 – Works Tender for the Design and Build of Two Utility Scale Battery Energy Storage System (Bess) at the A-Station Tunnel in Marsa and at Delimara Power Station in an Environmentally Friendly Manner

³ Pages 52 to 56 of Case 2143



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the ground of grave professional misconduct, expressly captured in the exclusion regime of the ESPD.

It is once and again the opinion of this Board that to invoke self-limitation so as to preclude even the most elementary enquiry is to misapply the doctrine. Self-limitation protects against overreach, but it cannot justify under-reach. Where serious, readily verifiable doubts arise within the scope of the exclusion grounds, vigilance demands at the very least a request for clarification from the bidder.

Thus, the TEC was not being asked to go beyond the dossier or invent new criteria. It was rather being asked to apply existing criteria with the diligence required by law. The failure to do so is not an excess of discretion but an abdication of responsibility.

Both EU and Maltese case law recognise that self-limitation does not equate to blindness. Authorities must ensure the truthfulness of self-declarations, otherwise the mechanism of exclusion grounds under Article 57 (and Article 199 PPR) becomes hollow.

The reliance on a bare self-declaration, in circumstances where significant red flags existed, does not satisfy the standard of due diligence expected of a Contracting Authority in a procurement of this magnitude. Accordingly, the Board finds that the Contracting Authority erred in failing to verify the declarations and in failing to require further clarification."

- 3.14. The Applicant argues that similar to Case 2143, its grievance does not consist of a plea to the PCRB to forgo the doctrine of self-limitation and force the TEC to go over and above its role or the limits of the Tender Document, but it is aggrieved by the fact that the TEC failed to act vigilantly when it was faced with a submission that is not backed by verifiable data.
- 3.15. In fact, the Contracting Authority's TEC has various tools at its disposal to verify information which is vague, unclear, or potentially misleading. The PPR⁴ and the General Rules Governing Tenders permit TECs to ask for supplementary information whenever something is not immediately certain from the original offer. The wording of the ESPD Questionnaire itself should be seen in this light.
- 3.16. The TEC failed to request a copy of the annual accounts (since these are not available to the Contracting Authority on the national database) despite this being a Note 2 field

⁴ Regulation 62



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(therefore capable of rectification) and therefore its recommendation for award is substantially and materially vitiated.

4. **Second Grievance: the Recommended Bidder made false declarations in his offer because it cannot supply the Interferon Beta-1A 30 Micrograms Solution for Injection without relying on third-parties**
- 4.1. As previously described, the Applicant is the sole licensed distributor of the Avonex medicinal product as produced by Biogen, in Malta.
- 4.2. The Applicant submits that it is unreasonable to assume that the foreign producer Biogen shall permit the distribution of the Avonex product in Malta without the involvement of the Applicant, since the latter and Biogen have developed a professional relationship over the years which cannot be bypassed because a new player has been recommended for the award of a tender.
- 4.3. Therefore, it is probable that the Recommended Bidder shall have no other choice but to turn towards the Applicant to subcontract the importation and distribution element of the contract, to avoid commercial disputes with both the Applicant and Biogen.
- 4.4. This scenario is directly and flagrantly in contradiction with the declarations made by the Applicant in the same ESPD (as confirmed by the Department of Contracts in their reply to the Applicant's request for information) that no proportion of the contract shall be subcontracted to third-parties.
- 4.5. The Applicant contends that the Recommended Bidder knowingly provided a false and misleading declaration when it kept the subcontracting proportion blank, effectively providing assurances to the Contracting Authority that it is capable of delivering the supplies in question.
- 4.6. The General Rules Governing Tenders stipulates in Clause 21.3 thereof that : *"By submitting the offer the tenderer fully recognises and accepts that any false, inaccurate or incomplete information deliberately provided in the submission may result in an exclusion from this and other contracts funded by the Government of Malta and the European Union."*
- 4.7. The Applicant therefore feels aggrieved by the false, inaccurate, or incomplete information deliberately provided in the submission made by the Applicant wherein it is stating that it shall not rely on third parties (including subcontractors) to supply the Inteferon Beta-1A 30 Micrograms Solution for Injection medicinal products to the Contracting Authority.

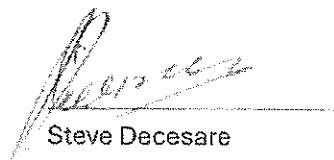


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5. Conclusion

- 5.1. In view of the above, the Applicant respectfully requests the Board to:
- 5.1.1. order the re-evaluation of the offers submitted in this Tender Procedure by a re-composed Tender Evaluation Committee (TEC) that shall conduct its re-evaluation in line with the clarifications and/or rectifications that should have been requested from the Department of Contracts in line with the material deficiencies described in the First Grievance; and
- 5.1.2. without prejudice to the previous request, if it is proven that the Applicant is unable to procure the supplies without the involvement and, or, reliance on third party, declare that the Recommended Bidder has submitted false, inaccurate, or incomplete information deliberately and to provide all necessary remedies to the Department of Contracts and, or, the Contracting Authority to protect its rights at law including but not limited to through the disqualification of the Recommended Bidder's offer, and the exclusion of the economic operator, if deemed necessary.
- 5.2. In the event that it is not possible to conduct the re-evaluation of the Tender Procedure, as aforesaid in sub-paragraph 5.1.1, the Applicant respectfully requests to Board to order the cancellation of the Tender Procedure and the re-issuance of a procurement process which allows economic operators to offer the same medicinal indication, but this time in full respect of the widely held procurement principles which have been ignored in these circumstances.
- 5.3. In addition, the Applicant respectfully requests the Board to reimburse the deposit paid to the Applicant, irrespective of the outcome, given that the Department of Contract's reply to the Request for Information did not prevent the current objection from being tabled due to the deficiencies in the evaluation process described as aforesaid.
- 5.4. The Applicant reserves the right to make other submissions, summon witnesses and submit other evidence during the proceedings relating to this Application before the Board.

Yours faithfully,



Steve Decesare

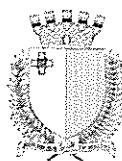


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List_of_Witnesses

- All members of the Contracting Authority's Tender Evaluation Committee
- Person(s) responsible for and, or involved in the preparation of the Tender Document
- Person(s) responsible for determining the technical specifications
- Person(s) from the Contracting Authority responsible for this procurement process
- Person(s) from the Applicant and, or its suppliers
- Experts and medical professionals
- Person(s) from relevant authorities involved in healthcare sector

DIPARTIMENT TAL-KUNTRATTI
Notre Dame Ravelin
Floriana FRN 1601 – MALTA



DEPARTMENT OF CONTRACTS
Notre Dame Ravelin
Floriana FRN 1601 – MALTA

Contact Number: +356 2378 1001
e-Mail: info.contracts@gov.mt
website: www.contracts.gov.mt

7th July 2026

PHARMA.MT LTD
TID 236981

REFERENCE: CT2271/2025

**SUBJECT: SUPPLY OF INTERFERON BETA-1A 30 MICROGRAMS SOLUTION
FOR INJECTION**

Dear Sir/Madam,

Thank you for participating in the above-mentioned tender procedure. However, I regret to inform you that the tender submitted by your company was not successful since the criteria for award of this tender was the cheapest priced offer satisfying the administrative and technical criteria.

The tender was recommended for award to **TID 236991 Pharma Regulatory Services Limited for the amount of €3,324,405.00 excluding VAT**, this being the cheapest priced tender satisfying the administrative and technical criteria.

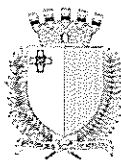
If you intend to object to this decision, the Public Procurement Regulations allow for an official objection which in this case has to be lodged electronically with the Public Contracts Review Board by sending an email on: info.pcrb@gov.mt by noon of Friday 17th July 2026 against a deposit of €18,244.00.

Payments are to be made through bank transfer in terms of the following details:

Name of Account Holder	Cashier Malta Government
Name of Bank	Central Bank of Malta
Address of Bank	Castille Place, Valletta
Account Number	40001EUR-CMG5-001-H
BIC	MALT MT MT
IBAN Code	MT55MALT011000040001EURCMG5001H
Bank Code	01100

The official schedule can be accessed on the website: www.etenders.gov.mt.

DIPARTIMENT TAL-KUNTRATTI
Notre Dame Ravelin
Floriana FRN 1601 – MALTA



DEPARTMENT OF CONTRACTS
Notre Dame Ravelin
Floriana FRN 1601 – MALTA

Contact Number: +356 2378 1001
e-Mail: info.contracts@gov.mt
website: www.contracts.gov.mt

Although we have not been able to make use of your services on this occasion, I trust that you will continue to take an active interest in our initiatives.

Yours sincerely,

Gianella Bonnici

f/ Director General (Contracts)

Vella Graziella at PCRB

From: Steve Decesare <steve.decesare@camilleripreziosi.com>
Sent: Friday, 17 July 2026 12:35
To: Info at PCRB
Subject: RE: re: Appeal

CAUTION: This email originated from OUTSIDE the Government Email Infrastructure. DO NOT CLICK LINKS or OPEN attachments unless you recognise the sender and know the content is safe.

Dear Sir, Madam

Proof of payment below:



APS BANK Plc

Registration number
Address

C 2192

APS Centre, Tower Street B'Kara BKR
4012

12:3017.07.2026

Printed on CLAYTON
Printed by CHIRCOP

Transfer to a non-APS account

From account **20000609193**

Status **Sent for processing**

Currency	EUR
Amount	18,244.00
To account	MT55MALT011000040001EURCMG5001H
Payment date	17.07.2026
Payment reference	TRANSCRIPTS REFERENCE: CT2271/2025
Fee	0.00
Charges	SHA - Charges will be shared
Sort code	
Swift code	MALMTMTXXX
Beneficiary bank country	MALTA
Beneficiary name	Cashier Malta Government