

**THE JUBILEE INSURANCE PERSONAL PENSION PLAN  
ANNUAL REPORT AND FINANCIAL STATEMENTS  
FOR THE YEAR ENDED 31 DECEMBER 2024  
RBA REGISTRATION NUMBER 01098**



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**CORPORATE TRUSTEE**

: Kingsland Court Trustee Services Limited  
: Flamingo Towers, Upperhill  
: P.O. Box 10285, 00100  
: NAIROBI

**REGISTERED OFFICE**

: Jubilee Life Insurance Limited  
: Jubilee House, Wabera street  
: P.O. Box 30376, 00100  
: NAIROBI

**SCHEME ADMINISTRATOR**

: Jubilee Life Insurance Limited  
: Jubilee Insurance House, Wabera street  
: P.O. Box 30376, 00100  
: NAIROBI

**APPROVED ISSUER**

: Jubilee Life Insurance Limited  
: Jubilee Insurance House, Wabera street  
: P.O. Box 30376, 00100  
: NAIROBI

**INDEPENDENT AUDITOR**

: PKF Kenya LLP  
: Certified Public Accountants  
: P.O. Box 14077, 00800  
: NAIROBI

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## **REPORT OF DIRECTORS OF THE CORPORATE TRUSTEE**

The directors of the corporate trustee presents their annual report together with the audited financial statements for the year ended 31 December 2024, which disclose the state of affairs of the pension plan.

### **ESTABLISHMENT, NATURE AND STATUS OF THE PENSION PLAN**

The pension plan was established and is governed by a Trust Deed dated 1 July 2000. It is a defined contribution pension plan and provides, under the rules of the pension plan, retirement benefits for the members of The Jubilee Insurance Personal Pension Plan. It is an exempt approved fund under the Income Tax Act (Cap. 470) upto statutory limit and is registered with the Retirement Benefits Authority.

### **PRINCIPAL ACTIVITY**

The main purpose of the plan is the provision of pensions to members upon their retirement at a specified age and relief to the dependants of deceased members as defined in the trust deed and rules.

### **CONTRIBUTIONS**

As per the rules of the pension plan, members contribute at their own pace subject to a minimum of Shs. 48,000 (Shs. 4,000 per month) in the first year.

### **MEMBERSHIP**

The following is the movement in the number of members in the pension plan:

	<b>2024 Numbers</b>	<b>2023 Numbers</b>
At start of year	50,934	48,923
Additions during the year	3,711	2,869
Leavers during the year	(1,358)	(858)
At end of year	<u><u>53,287</u></u>	<u><u>50,934</u></u>

The movement comprises of deferred and active members. Deferred members comprise those members who have left the fund, for any reason other than death, having completed one or more years of service and who are entitled to a deferred benefit of the amount accrued in respect of the contributions and interests as guided by the regulations.

### **FINANCIAL REVIEW**

The statement of changes in net assets available for benefits on page 10 shows an decrease in net assets available for benefits of Shs. 1,967,388,799 (2023: Shs. 2,082,144,572). The statement of net assets available for benefits on page 11 shows net assets of Shs. 23,036,050,701 (2023: Shs. 21,068,661,902).

### **INVESTMENT OF FUNDS AND INVESTMENT POLICY**

The overall responsibility for the investment and performance of the plan funds lies with the directors of the corporate trustee.

The principal objective of the fund investment policy is to ensure the solvency of the plan over time and meet its benefit obligations as required. The total return objective is to achieve maximum investment income.

**INVESTMENT OF FUNDS AND INVESTMENT POLICY (CONTINUED)**

The plan's investment strategy is to produce a long term return which maximizes real growth while ensuring income generation and liquidity sufficient to meet benefits payments. The directors of the corporate trustee take reasonable care and the issuer endeavours to ensure that the investments made are in the best interests of the members of the plan.

We confirm that there is no self-investment, nor have any scheme assets been used as security or collateral on behalf of a member or any connected business or individual.

The day to day administration of the pension plan is dealt with by Jubilee Life Insurance Limited who also is the approved issuer.

Under the terms of their appointment The Jubilee Life Insurance of Kenya Limited are responsible for the investment of the fund. During the year, members' funds were invested with Jubilee Life Insurance Limited in a Deposit Administration Account and the net return declared and credited to members accounts was at the rate of 12% (2023: 10.45%).

The plan funds are invested as provided under the Retirement Benefits Authority Act and Regulations.

**CORPORATE TRUSTEE**

The corporate trustee is appointed in accordance with the Retirement Benefits Act, 1997. The corporate trustee to the date of this report is shown on page 1.

**STATEMENT AS TO DISCLOSURE TO THE PLAN'S AUDITOR**

Each director of the corporate trustee at the time this report was approved, confirms that, to the best of their knowledge and belief, the information furnished to the auditor for the purpose of the audit is correct and complete in every aspect.

**INDEPENDENT AUDITOR**

The plan's auditor, PKF Kenya LLP, has expressed willingness to continue in office in accordance with section 34(3) of the Retirement Benefits Act, 1997. The trustees monitor the effectiveness, objectivity and independence of the auditor. The trustees also approve the annual audit engagement contract which sets out the terms of the auditor's appointment and the related fees.

**BY THE ORDER OF DIRECTORS OF THE CORPORATE TRUSTEE**

  
**DIRECTOR OF THE CORPORATE TRUSTEE**

28.03

2025



**NAIROBI**



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## **STATEMENT OF TRUSTEE'S RESPONSIBILITIES**

The Retirement Benefits (Individual Retirement Benefit Schemes) Regulations, 2000 made under Retirement Benefits Act, 1997 require the directors of the corporate trustee to prepare financial statements in a prescribed form for each financial year. The directors of the corporate trustee are also required to ensure that the pension plan keeps proper accounting records of its income, expenditure, liabilities and assets, and that contributions are remitted to the approved issuer in accordance with the rules of the pension plan. The directors of the corporate trustee are also responsible for safeguarding the assets of the pension plan and for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The directors of the corporate trustee accept responsibility for the preparation and fair presentation of financial statements that are free from material misstatement whether due to fraud or error. They also accept responsibility for:

- i) designing, implementing and maintaining internal control relevant to the preparation and fair presentation of the financial statements;
- ii) selecting and applying appropriate accounting policies; and
- iii) making accounting estimates and judgements that are reasonable in the circumstances.

The directors of the corporate trustee confirm that the financial statements give a true and fair view of the net assets available for benefits and changes in net assets available for benefits and cash flows for the year then ended in accordance with the IFRS® Accounting Standards and the requirements of the Retirement Benefits Act, 1997.

Having made an assessment of the scheme's ability to continue as a going concern, the directors of the corporate trustee are not aware of any material uncertainties related to events or conditions that may cast doubt upon the scheme's ability to continue as a going concern for at least the next twelve months from the date of this statement.

The directors of the corporate trustee acknowledge that the independent audit of the financial statements does not relieve them of their responsibilities.

Approved by the board of directors of the corporate trustee on 28.03 2025 and signed on its behalf by:



**DIRECTOR OF THE CORPORATE TRUSTEE**



**DIRECTOR OF THE CORPORATE TRUSTEE**





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**PLAN GOVERNANCE DISCLOSURE STATEMENT**

**1. Trustees in office**

Name of trustee	Age in years	Category	No. of meetings attended	TDPK certified	Highest academic qualification	Member of other pension boards
(Corporate Trustee) Kingsland Court Trustees Services Limited	N/A	Independent	5	Yes	N/A	Yes

**2. Trustees meeting**

The board of trustees held four (4) meetings during the year ended 31 December 2024. The meetings were held on the dates set out hereunder:

- (a) 16 March 2024 – Quarter 1 2024 Trustee Meeting
- (b) 25 June 2024 – Quarter 2 2024 Trustee Meeting
- (c) 16 September 2024 – Quarter 3 2024 Trustee Meeting
- (d) 28 November 2024 – Quarter 4 2024 Trustee Meeting

**3. Composition of trustee boards - [N/A – Corporate Trustee]**

**4. Committees of the board - [N/A – Corporate Trustee]**

The Corporate Trustee's main body for discharging its duties is its Corporate Trustee Services Committee ("CTSC"). This body operates very much like a trustee board and meets formally at least once per quarter. CTSC reviews the schemes' operations and governance under the broad headings of "Investments", "Governance, Audit and Risk" and "Member Administration, Relations and Services" focusing on reports from the service providers as well as other material. Service providers and representatives of the sponsor attend these meetings.

**5. Fiduciary responsibility statement**

The Corporate Trustee is the governing body of the Jubilee Insurance Personal Pension Plan and is responsible for the corporate governance of the scheme. The trustee is responsible for ensuring that the administration of the scheme is conducted in the best interests of the scheme's members and the sponsor. To achieve this, the trustee embraces its fiduciary responsibility by:

- (a) Acting honestly and not improperly using inside information or abuse its position;
- (b) Exercising the highest degree of care and diligence in the performance of their duties that a reasonable person in a like position would exercise in the circumstances; and
- (c) Performing their duties with the requisite degree of skill.

The plan has complied with the laws, regulations and guidelines that govern retirement benefits schemes and the plan's business operations.

**6. Responsible corporate citizenship**

The plan is 100% invested in a guaranteed fund and has not been involved in any activity that may undermine the well-being of the Sponsor, members or the community in which it operates.



**7. Key outcomes**

The corporate trustee seeks to achieve the following:

- (a) Building trust with the members and sponsor of the scheme so that they are satisfied with the administration of the scheme;
- (b) Supporting innovation and developing solutions that meet the members' and sponsor's needs; and
- (c) Ensuring that the scheme's administrative processes remain transparent and accessible to members and the sponsor.

**8. Annual general meeting**

The scheme's annual general meeting was held virtually on 14 August 2024. Members were adequately engaged and all their concerns were handled during questions and answer session.

**9. Members' sensitization**

The Sponsor's relationship teams did visits to a number of contributing employers during the year and also conducted member education and sensitization via virtual means. Members' questions were also addressed during the AGM and contributing employers were also reminded that they can request for Member Education sessions through the Sponsor.

During the sensitization activity, members were reminded of the Retirement Benefits Authority Whistle Blower portal to report any unusual occurrences in the management of scheme affairs.

**10. Trustees' remuneration policy**

The corporate trustee was remunerated in accordance with the contract between the Trustee, Kingsland Court Trustees Services Limited and the Sponsor, Jubilee Life Insurance Limited. All expenses except for income tax and RBA Levy are borne by the Sponsor.

**11. Board of trustees' evaluation - [N/A – Corporate Trustee]**

**12. Independent auditor**

PKF Kenya LLP, have expressed their willingness to continue in office.

Approved by the directors of the corporate trustees on 28.03 2025 and signed on its behalf by:

  
\_\_\_\_\_  
**Director of the Corporate Trustee**





**REPORT OF THE INDEPENDENT AUDITOR  
TO THE MEMBERS OF THE JUBILEE INSURANCE PERSONAL PENSION PLAN**

**Opinion**

We have the financial statements of The Jubilee Insurance Personal Pension Plan, set out on pages 10 to 20, which comprise the statement of net assets available for benefits as at 31 December 2024, statement of changes in net assets available for benefits for the year then ended and notes to the financial statements including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of The Jubilee Insurance Personal Pension Plan net assets available for benefits as at 31 December 2024 and changes in net assets available for benefits for the year then ended in accordance with IFRS Accounting Standards and the Retirement Benefits Act, 1997.

**Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing. Our responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the pension plan in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for professional accountants (IESBA Code) together with the ethical requirements that are relevant to our audit of the financial statements in Kenya, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**Other information**

The directors of the corporate trustee are responsible for the other information. The other information comprises pension plan information, report of the directors of the corporate trustee and statement of directors of the corporate trustees' responsibilities and the plan governance disclosure statement that form part of the annual report but does not include the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

**Responsibilities of board of directors of the corporate trustees' for the financial statements**

The directors of the corporate trustee are responsible for the preparation of the financial statements that give a true and fair view in accordance with IFRS Accounting Standards and the requirements of the Retirement Benefit Act, 1997 and for such internal control as the directors of the corporate trustee determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.



**REPORT OF THE INDEPENDENT AUDITOR  
TO THE MEMBERS OF THE JUBILEE INSURANCE PERSONAL PENSION PLAN (CONTINUED)**

**Responsibilities of board of directors of the corporate trustees' for the financial statements (continued)**

In preparing the financial statements, the directors of the corporate trustee are responsible for assessing the pension plan's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors of the corporate trustee either intend to liquidate the pension plan or to cease operations, or have no realistic alternative but to do so.

The directors of the corporate trustee are responsible for overseeing the plan's financial reporting process.

**Auditor's responsibilities for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with International Standards on Auditing, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the pension plan's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the directors of the corporate trustee.

Conclude on the appropriateness of the directors of the corporate trustee's use of the going concern basis of accounting and based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the pension plan's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the pension plan to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.





**REPORT OF THE INDEPENDENT AUDITOR  
TO THE MEMBERS OF THE JUBILEE INSURANCE PERSONAL PENSION PLAN (CONTINUED)**

**Auditor's responsibilities for the audit of the financial statements (continued)**

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

**The engagement partner responsible for the audit resulting in this report of the independent auditor is CPA Patrick Kuria, Practising certificate No. 2045**



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**For and behalf of PKF Kenya LLP  
Certified Public Accountants  
Nairobi, Kenya**

March 28, 2025

236/25

PKF Kenya LLP, LLP-8519PL, Kalamu House, Grevillea Grove, Westlands, P O. Box 14077, 00800, Nairobi, Kenya. +254 207 766400+254 732 144000  
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**STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS**

	Notes	2024 Shs	2023 Shs
<b>Dealings with members</b>			
Contributions for the year	2(a)	2,041,777,866	1,967,580,887
Transfers in	2(b)	457,265,157	428,338,478
Leavers	2(c)	(2,494,923,636)	(1,423,783,267)
Transfers out	2(d)	<u>(375,043,461)</u>	<u>(733,626,153)</u>
<b>Net decrease from dealings with members</b>		<u>(370,924,073)</u>	<u>238,509,945</u>
<b>Return on plan investments</b>			
Plan investments income	3	2,559,609,103	2,020,062,048
Tax	4	(216,308,047)	(171,427,421)
Administrative expenses	5	<u>(4,988,184)</u>	<u>(5,000,000)</u>
<b>Net return on plan investments</b>		<u>2,338,312,872</u>	<u>1,843,634,627</u>
<b>Net increase in net assets available for benefits</b>		1,967,388,799	2,082,144,572
Net assets available for benefits at start of year		<u>21,068,661,902</u>	<u>18,986,517,330</u>
Net assets available for benefits at end of year	6	<u>23,036,050,701</u>	<u>21,068,661,902</u>

The notes on pages 12 to 20 form an integral part of the financial statements.

Report of the independent auditor - page 7 to 9.



*The Jubilee Insurance Personal Pension Plan*

*Annual report and financial statements*

*For the year ended 31 December 2024*

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**STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS**

		<b>As at 31 December</b>	
		<b>2024</b>	<b>2023</b>
	<b>Notes</b>	<b>Shs</b>	<b>Shs</b>
<b>ASSETS</b>			
Plan investments	7	23,410,239,027	21,345,013,530
Tax recoverable	4	855,137	16,241,420
		<u>23,411,094,164</u>	<u>21,361,254,950</u>
<b>LIABILITIES</b>			
Payables	8	375,043,463	292,593,048
<b>Net assets of the plan</b>		<u>23,036,050,701</u>	<u>21,068,661,902</u>

The financial statements on pages 10 to 20 were approved and authorised for issue by the board of  
directors of the corporate trustee on 28.03 2025 and were signed on its behalf by:

John  
\_\_\_\_\_  
**DIRECTOR OF CORPORATE TRUSTEE**

John  
\_\_\_\_\_  
**DIRECTOR OF CORPORATE TRUSTEE**

The notes on pages 12 to 20 form an integral part of the financial statements.

Report of the independent auditor - page 7 to 9.





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## **NOTES**

### **1. Significant accounting policies**

The accounting policy information considered material in the preparation of these financial statements is set out below. The accounting policy information has been consistently applied to all the years presented, unless otherwise stated.

These financial statements comply with the requirements of the Kenyan Retirement Benefits Act. The statement of changes in net assets available for benefits represents the statement of income and expenditure referred to in the Act. The statement of net assets available for benefits represents the statement of assets and liabilities referred to in the Act.

#### **a) Basis of preparation**

The financial statements have been prepared under the historical cost convention, except as indicated otherwise below and are in accordance with IFRS Accounting Standards, Retirement Benefits Act, 1997 as amended, and with the Retirement Benefits (Individual Retirement Benefits Schemes) Regulations, 2000. The historical cost convention is generally based on the fair value of the consideration given in exchange of assets. Fair value is the price to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date, regardless of whether that price is directly observable or estimated using another valuation technique. In estimating the fair value of an asset or liability, the plan takes into account the characteristics of the asset or liability if market participants would take those characteristics into when pricing the asset or liability at the measurement date.

#### **Going concern**

The financial performance of the plan is set out in the directors of the corporate trustees' report and in the statement of changes in net assets available for benefits. The financial position of the plan is set out in the statement of net assets available for benefits. Disclosures in respect of principal risks and uncertainties and fund management are set out in note 10 and 11.

Based on the financial performance and position of the plan and its risk management policies, the trustees are of the opinion that the scheme is well placed to continue in business for the foreseeable future and as a result the financial statements are prepared on a going concern basis.

#### **New standards, amendments and interpretations adopted by the plan**

The fund applied for the first time certain standards and amendments, which are effective for annual periods beginning on or after 1 January 2024. The fund has not early adopted any other standard, interpretation or amendment that has been issued but is not yet effective.

#### **Amendments to IAS 1 'Classification of Liabilities as Current or Non-current' and 'Non-current Liabilities with Covenants'**

The amendments to IAS 1 'Classification of Liabilities as Current or Non-current' and 'Non-current Liabilities with Covenants' (issued in January 2020 and October 2022) clarify the criterion in IAS 1 for classifying a liability as non-current: the requirement for an entity to have the right to defer settlement for at least 12 months after the reporting date. In addition, a requirement has been introduced to require disclosure when a liability arising from a loan agreement is classified as non-current and the entity's right to defer settlement is contingent on compliance with future covenants within twelve months.

This amendment had no impact on the financial statements of the fund. The fund intends to use the practical expedients in future periods if they become applicable.

#### **Amendments to IAS 7 and IFRS 7 'Supplier Finance Arrangements' (issued in May 2023)**

The amendments to IAS 7 and IFRS 7 'Supplier Finance Arrangements' (issued in May 2023), clarify the characteristics of supplier finance arrangements and require additional disclosure of such arrangements. The disclosure requirements in the amendments are intended to assist users of financial statements in understanding the effects of supplier finance arrangements on an entity's liabilities, cash flows and exposure to liquidity risk.

**1. Significant accounting policies (continued)**

**a) Basis of preparation (continued)**

**Amendments to IAS 7 and IFRS 7 'Supplier Finance Arrangements' (issued in May 2023)  
(Continued)**

This amendment had no impact on the financial statements of the fund. The fund intends to use the practical expedients in future periods if they become applicable.

**New standards, amendments and interpretations issued but not effective**

At the date of authorisation of these financial statements the following standards and interpretations which have not been applied in these financial statements were in issue but not yet effective for the year presented.

- Amendments to IFRS 9 and IFRS 7 'Classification and Measurement of Financial Instruments' (issued May 2024), effective for annual periods beginning on or after 1 January 2026, clarify that a financial liability is derecognised on the 'settlement date', i.e., when the related obligation is discharged, cancelled, expires or the liability otherwise qualifies for derecognition. They also introduce an accounting policy option to derecognise financial liabilities that are settled through an electronic payment system before settlement date if certain conditions are met.

The amendments also clarify how to assess the contractual cash flow characteristics of financial assets that include environmental, social and governance (ESG)-linked features and other similar contingent features and the treatment of non-recourse assets and contractually linked instruments.

They also require additional disclosures in IFRS 7 for financial assets and liabilities with contractual terms that reference a contingent event (including those that are ESG-linked), and equity instruments classified at fair value through other comprehensive income.

- IFRS 18 'Presentation and Disclosure in Financial Statements' (issued in April 2024), replaces IAS 1 'Presentation of Financial Statements'. IFRS 18 introduces new categories and subtotals the statement of profit or loss. It also requires disclosure of newly defined management-defined performance measures (MPM) and includes new requirements for the location, aggregation and disaggregation of financial information based on the identified 'roles' of the primary financial statements (PFS) and the notes.

Some requirements previously included within IAS 1 have been moved to IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors, which has been renamed IAS 8 Basis of Preparation of Financial Statements. IAS 34 Interim Financial Reporting has also been amended to require disclosure of MPMs.

IFRS 18, and the amendments to the other accounting standards, is effective for reporting periods beginning on or after 1 January 2027 and will apply retrospectively. Early adoption is permitted and must be disclosed.

The scheme is currently working to identify all impacts the amendments will have on the primary financial statements and notes to the financial statements.

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**NOTES (CONTINUED)**

**1. Significant accounting policies (continued)**

**a) Basis of preparation (continued)**

Except where indicated above, the trustees do not expect that adoption of the above standard and interpretation will have a material impact on the financial statements in future periods. The fund plans to apply the change above, if applicable, from its effective date noted above.

**b) Significant accounting judgements, estimates and assumptions**

In the application of the accounting policies, the trustees are required to make judgements, estimates and assumptions about the carrying amount of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other relevant factors. Such estimates and assumptions are reviewed on an ongoing basis. Revisions to estimates are recognised prospectively.

The directors of the corporate trustee have made the following assumptions that have a significant risk of resulting in a material adjustment to the carrying amounts of assets and liabilities within the next financial year.

**c) Plan investments income**

Income comprises the fair value of the consideration received or receivable in the ordinary course of business.

The plan recognises income when the amount of revenue can be reliably measured, it is probable that future economic benefits will flow to the entity and when the specific criteria has been met for each of the plan's activities as described below. The scheme bases its estimates on historical results, type of transaction and specifics of each arrangement.

- Interest income is recognised on a time proportion basis using the effective interest method. Once a financial asset is identified as credit-impaired, the effective interest rate is applied to the amortised cost (net of impairment losses) in subsequent reporting.

**d) Contributions**

Contributions receivable are accounted for in the period in which they fall due. Normal and additional contributions, are generally accounted for on an accrual basis in the payroll period to which they relate. In the case of members' contributions this is when deducted from pay.

**e) Plan investments**

All plan investments are carried at fair value. For marketable securities, the fair value is the market value which is the most useful measure of the securities as at the report date and of the investment performance for the period.

Those securities that have a fixed redemption value and have been acquired to match the obligations of the plan, or specific parts thereof, are carried at amounts based on their ultimate redemption value assuming a constant rate of return to maturity.

Plan investments have been carried at the ultimate redemption value. Any assets in operations of the plan are accounted for in accordance with the applicable standards.

**f) Transfers from and to other schemes**

Transfer values represent the capital sums either receivable in respect of members from other schemes or payable to schemes of members who have left the scheme. They are accounted for on an accruals basis on the date the directors of corporate trustee of the receiving scheme accept the liability.

**1. Significant accounting policies (continued)**

**g) Financial instruments**

**Financial assets**

Financial instruments are recognised when, and only when, the scheme becomes party to the contractual provisions of the instrument.

***Financial assets***

**Initial recognition and measurement**

Purchases or sales of financial assets are recognised initially using the trade date accounting which is the date the scheme commits itself to the purchase or sale.

The plan classifies its financial assets into amortised cost; financial assets that are held within a business model whose objective is to hold assets in order to collect contractual cash flows, and for which the contractual terms of the financial asset give rise on specified dates to cash flows that are Solely Payments of Principal and Interest (SPPI) on the principal amount outstanding. The carrying amount of these assets is adjusted by any expected credit loss allowance measured and recognised.

At initial recognition of a financial asset, the plan determines whether newly recognised financial assets are part of an existing business model or whether they reflect the commencement of a new business model. The plan reassess its business models each reporting period to determine whether the business models have changed since the preceding period. For the current and prior reporting period, the plan has not identified a change in its business models.

**Derecognition/write off**

Financial assets are derecognised when the rights to receive cash flows from the financial asset have expired, when the scheme has transferred substantially all risks and rewards of ownership, or when the scheme has no reasonable expectations of recovering the asset.

**Impairment**

The plan recognises loss allowances for Expected Credit Losses (ECLs) on the following financial instruments that are measured at amortised cost:

- Contributions due

The loss allowance is measured at an amount equal to the lifetime expected credit losses for contribution receivable.

Expected credit losses are measured in a way that reflects an unbiased and probability-weighted amount determined by evaluating a range of possible outcomes, the time value of money, and reasonable and supportable information that is available without undue cost or effort at the reporting about past events, current conditions and forecasts of future economic conditions.

**Presentation**

All financial assets are classified as non-current except those with maturities of less than 12 months from the reporting date or those which management has the express intention of holding for less than 12 months from the reporting date, in which case they are classified as current assets.

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**NOTES (CONTINUED)**

**1. Significant accounting policies (continued)**

**g) Financial instruments (continued)**

***Financial liabilities***

**Initial recognition and measurement**

Financial liabilities are classified and measured at amortised cost.

**Presentation**

All financial liabilities are classified as non-current except those expected to be settled in the plan's normal operating cycle, those payable or expected to be paid within 12 months of the reporting date and those which the scheme does not have an unconditional right to defer settlement for at least 12 months after the reporting date.

**Derecognition**

A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as the derecognition of the original liability and the recognition of a new liability. The difference in the respective carrying amounts is recognised in net assets available for benefits.

**Offsetting financial instruments**

Financial assets and liabilities are offset and the net amount presented in the statement of financial position when there is a legally enforceable right to offset the amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

**h) Contributions**

Pensions in payment, including pensions funded by annuity contracts and amounts paid under income draw-down arrangements, are accounted for in the period to which they relate. Where members can choose whether to take their benefits as a full pension or as a lump-sum with reduced pension, retirement benefits are accounted for on an accruals basis on the later of the date of retirement and the date the option is exercised.

Other benefits are accounted for on an accruals basis on the date of retirement or death, as appropriate. Refunds and opt-outs are accounted for when the trustees/directors of corporate trustee are notified of the member's decision to leave the scheme.

**i) Cash and cash equivalents**

A statement of cash flows has not been prepared as the funds are being managed on a pooled basis by Jubilee Life Insurance Limited.

**j) Taxation**

The plan is exempt from Income Tax under the Income Tax Act (Cap. 470) up to the statutory limit.

**Value Added Tax (VAT)**

The fund is not registered for VAT obligation and therefore VAT incurred on purchase of services is recognised as part of the expense item.

**k) Comparatives**

There were no changes in presentation in the current year.

	2024 Shs	2023 Shs
<b>2. Dealings with members</b>		
a) Contributions for the year		
Registered	1,153,743,240	1,101,169,480
Unregistered	888,034,626	866,411,407
	<hr/>	<hr/>
	2,041,777,866	1,967,580,887
b) Transfer in	<hr/>	<hr/>
c) Leavers	<hr/>	<hr/>
d) Transfer out	<hr/>	<hr/>
Net decrease from dealings with members	<hr/>	<hr/>
<b>3. Plan investments income</b>		
Interest income:	<hr/>	<hr/>
The plan investments income allocated to the registered and unregistered portion, for taxation purposes, can be analysed as follows:		
- registered	1,838,582,278	1,448,637,311
- unregistered	721,026,825	571,424,737
	<hr/>	<hr/>
	2,559,609,103	2,020,062,048
<b>4. Tax</b>		
Tax charge - unregistered scheme	<hr/>	<hr/>
Tax is charged on plan investment income earned from the unregistered portion at the rate of 30% (2023: 30%)		
Total plan investments income	2,559,609,103	2,020,062,048
Less: income relating to portion within allowable limits (Note 3)	(1,838,582,278)	(1,448,637,311)
Taxable income	<hr/>	<hr/>
Tax thereon at 30% (2023: 30%)	<hr/>	<hr/>
The tax recoverable for the period is as follows:		
At the start of the year	(16,241,420)	(18,119,861)
Charge for the year	216,308,047	171,427,421
Paid in the year	(200,921,764)	(169,548,980)
	<hr/>	<hr/>
Tax recoverable	<hr/>	<hr/>
The splits of tax recoverable is as follows:		
2024 - payable	27,737,507	-
2023 - payable	(391)	12,350,833
2021 - (overpayment)/payable	(3,687,769)	(3,687,769)
2020 - (overpayment)	(6,610,717)	(6,610,717)
2018 - (overpayment)	(18,293,767)	(18,293,767)
	<hr/>	<hr/>
	(855,137)	(16,241,420)
<b>5. Administrative expenses</b>		
RBA levy	<hr/>	<hr/>
	4,988,184	5,000,000

**NOTES (CONTINUED)**

**6. Net assets of the plan**

The movement in the net assets of the plan is as follows:

<b>Year ended 31 December 2024</b>	<b>Registered Shs</b>	<b>Unregistered Shs</b>	<b>Total Shs</b>
At start of year	15,573,443,753	5,495,218,149	21,068,661,902
Contributions for the year (Note 2(a))	1,153,743,240	888,034,626	2,041,777,866
Transfers in 2(b)	303,362,001	153,903,156	457,265,157
Leavers (Note 2(c))	(1,417,351,584)	(1,077,572,052)	(2,494,923,635)
Transfers out 2(d)	(266,925,724)	(108,117,737)	(375,043,461)
Plan investments income (Note 3)	1,838,582,278	721,026,825	2,559,609,103
Tax (Note 4)	-	(216,308,047)	(216,308,047)
Administrative expenses (Note 5)	(3,604,573)	(1,383,611)	(4,988,184)
<b>At end of year</b>	<b>17,181,249,392</b>	<b>5,854,801,310</b>	<b>23,036,050,700</b>

**Year ended 31 December 2023**

At start of year	13,915,400,816	5,071,116,516	18,986,517,332
Contributions for the year (Note 2(a))	1,101,169,480	866,411,407	1,967,580,887
Transfers in 2(b)	289,781,637	138,556,842	428,338,478
Leavers (Note 2(c))	(775,181,013)	(648,602,254)	(1,423,783,267)
Transfers out 2(d)	(402,785,290)	(330,840,863)	(733,626,153)
Plan investments income (Note 3)	1,448,637,311	571,424,737	2,020,062,048
Tax (Note 4)	-	(171,427,421)	(171,427,421)
Administrative expenses (Note 5)	(3,579,188)	(1,420,814)	(5,000,002)
<b>At end of year</b>	<b>15,573,443,753</b>	<b>5,495,218,149</b>	<b>21,068,661,902</b>

**7. Plan investments**

	<b>2024 Shs</b>	<b>2023 Shs</b>
Plan investments	<b>23,410,239,027</b>	<b>21,345,013,530</b>

Plan investments comprise managed funds invested with Jubilee Life Insurance Limited. Interest is credited to members at rates declared by the insurance company.

The plan investments are carried at the ultimate redemption value. The pension plan has a minimum guaranteed rate of return of 4%.

The plan investments are carried at amounts based on their ultimate redemption value.

**8. Payables**

	<b>2024 Shs</b>	<b>2023 Shs</b>
RBA levy	5,000,000	5,000,000
Excess interest	370,043,463	287,593,048
	<b>375,043,463</b>	<b>292,593,048</b>

Excess interest relates to additional interest accrued for members who left the plan whereby the benefits were computed based on the guaranteed rate of 4% but the interest declared for the year was higher.

**8. Payables (continued)**

In the opinion of the board of directors of the corporate trustee, the carrying amounts of the pension plan payables approximate to their fair value.

The carrying amounts of the pension plan payables are denominated in Kenya Shillings.

The maturity analysis of the payables is within 4 to 12 months.

**9. Tax status of the scheme**

The Jubilee Insurance Personal Pension Plan has been approved by the Kenya Revenue Authority and is exempt from income tax on its investment income up to the statutory limit. Any income arising on contributions in excess of the statutory limit is charged income tax at the statutory tax rate.

**10. Financial risk management objectives and policies**

The plan's activities expose it to a variety of financial risks: market risk (including interest rate risk), credit risk and liquidity risk.

The plan's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise potential adverse effects on the scheme's financial performance.

Risk management is carried out by the directors of corporate trustee in close collaboration with the investment managers, under policies stipulated in the trust deed. The trustees and investment managers identify, evaluate and hedge financial risks.

**i) Market risk**

*- Interest rate risk*

During the year 31 December 2024, if interest rates at that date had been 100 basis point higher with all other variables held constant, gain for the year would have been Shs. 195,275,088 (2023: Shs. 176,902,835) higher arising mainly as a result of increase in the guaranteed fund. The sensitivity is lower in 2024 than in 2023 because of decrease in proportion of unregistered funds for the year.

**ii) Credit risk**

Credit risk arises from contributions receivable. There were no contributions receivable as at year end.

**iii) Liquidity risk**

Liquidity risk is the risk that the plan will encounter difficulty in meeting obligations associated with financial liabilities.

Prudent liquidity risk management implies maintaining sufficient cash and marketable securities.

The plan is not exposed to liquidity risk as it maintains adequate amounts of cash and cash equivalents to pay off liabilities as they fall due.

Note 8 disclose the maturity analysis of payables.

The undiscounted maturity analysis of payables is not materially different from the disclosure on Note 8.

**11. Fund management**

The plan's objectives when managing fund are:

- to comply with the Retirement Benefits (individual Retirement Benefits Schemes) Regulations, 2017 made under Retirement Benefits Act, 1997.
- to safeguard the entity's ability to continue as a going concern, so that it can continue to provide returns for members and benefits for other stakeholders.

The Retirement Benefits Act, 1997 requires the plan's directors of the corporate trustees to invest members' funds using prudent investment policies that shall get the members better market rates on their investments. This requirement has been complied with.

The plan sets the amount of fund in proportion to risk. The plan manages the fund structure and makes adjustments to it in the light of changes in economic conditions and the risk characteristics of the underlying assets. Fund comprises members' balances and reserves funds. Prudent liquidity risk management implies maintaining sufficient cash and marketable securities.

**12. Registration**

The pension plan is registered in Kenya under the Trustees (Perpetual Succession Act Cap. 164) and the Retirement Benefits Authority.

**13. Presentation currency**

The financial statements are presented in Kenya Shillings (Shs.).

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