

**BRITAM INDIVIDUAL PENSION PLAN**  
**ANNUAL REPORT AND FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED 31 DECEMBER 2025**  
**RBA REGISTRATION NUMBER 01629**

<b>CONTENTS</b>	<b><u>PAGE</u></b>
Plan information	1
Report of directors of corporate trustee	2 - 3
Statement of directors of corporate trustee's responsibilities	4
Plan governance disclosure statement	5 - 6
Report of the independent auditor	7 - 9
Financial statements:	
Statement of changes in net assets available for benefits	10
Statement of net assets available for benefits	11
Notes	12 - 20

**PLAN INFORMATION**

<b>CORPORATE TRUSTEE</b>	: Kingsland Court Trustee Services Limited : Flamingo Towers, Upperhill : P.O. Box 10285, 00100 : NAIROBI
<b>REGISTERED OFFICE</b>	: Britam Life Assurance Company (K) Limited : Britam Center, Upper Hill : P.O. Box 30375, 00100 : NAIROBI
<b>INDEPENDENT AUDITOR</b>	: PKF Kenya LLP : Certified Public Accountants : P.O. Box 14077, 00800 : NAIROBI
<b>ADMINISTRATORS</b>	: Britam Life Assurance Company (K) Limited : Britam Center, Upper Hill : P.O. Box 30375, 00100 : NAIROBI
<b>SCHEME APPROVED ISSUER</b>	: Britam Life Assurance Company (K) Limited : Britam Center, Upper Hill : P.O. Box 30375, 00100 : NAIROBI

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

The directors of the corporate trustees present their annual report together with the audited financial statements of Britam Individual Pension Plan for the year ended 31 December 2025, which present the financial position of the plan as at 31 December 2025 and its financial performance for the year then ended.

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

The pension plan was established and is governed by a Trust Deed dated 1 May 2005. It is a defined contribution pension plan and provides, under the rules of the pension plan, retirement benefits for the members of Britam 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 and other ancillary benefits 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**

This relates to contributions by various members and there is no defined rate of contributions, set in the plan's rules.

### **MEMBERSHIP**

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

	<b>2025 Numbers</b>	<b>2024 Numbers</b>
At start of year	9,631	11,132
Prior years adjustment	-	(1,857)
Admission during the year	1,832	767
Leavers during the year	<u>(233)</u>	<u>(411)</u>
At end of year	<u><u>11,230</u></u>	<u><u>9,631</u></u>

The movement comprise of active and deferred members. Deferred members comprise those members who have left the plan, 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 interest as guided by the regulations.

### **FINANCIAL REVIEW**

The statement of changes in net assets available for benefits on page 10 shows a decrease in net assets for the year of Shs. 1,560,438,500 (2024: Shs. 737,647,716) and statement of net assets on page 11 shows pension plan's net assets of Shs. 7,636,929,027 (2024: Shs. 6,076,490,527).

### **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 benefits obligations as required. The total return objective is to achieve maximum investment income.

**REPORT OF THE DIRECTORS OF CORPORATE TRUSTEE (CONTINUED)**

**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 Britam Life Assurance Company (K) Limited who also is the approved issuer.

Under the terms of their appointment, Britam Life Assurance Company (K) Limited are responsible for the investment of the plan. During the year, members' funds were invested with Britam Life Assurance Company (K) Limited in a guaranteed fund and the net interest was declared and credited to members accounts at the rate of 13% (2024: 13%).

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

**CORPORATE TRUSTEE**

The corporate trustee is appointed in accordance with the Retirement Benefits Act, 1997. The corporate trustee who held office during the year and 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, who was appointed in accordance with section 34(3) of the Retirement Benefits Act, 1997, has expressed willingness to continue in office. 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**

31 March 2026

**NAIROBI**

**STATEMENT OF DIRECTORS OF THE CORPORATE TRUSTEE'S RESPONSIBILITIES**

The Retirement Benefits (Individual Retirement Benefits 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 which give a true and fair view of the state of affairs of the plan as at the end of the financial year and of its net changes in net assets available for benefits. The directors of the corporate trustee are also required to ensure that the 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 plan.

The directors of the corporate trustee are also responsible for safeguarding the assets of the scheme 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 trustees 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 IFRS® Accounting Standards and the requirements for the Retirement Benefits Act, 1997.

Having made an assessment of the plan'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 plan's ability to continue as a going concern for at least the next twelve months from the date of this statement.

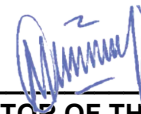
The directors of the corporate trustee acknowledge that the independent audit of the financial statements does not relieve them of their responsibilities.

Approved by the board of directors of the corporate trustee on 31 March 2026 and signed on its behalf by:



---

**DIRECTOR OF THE CORPORATE TRUSTEE**



---

**DIRECTOR OF THE CORPORATE TRUSTEE**

**BRITAM INDIVIDUAL PENSION 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 Trustee Services Limited	N/A	Independent	5	Yes	N/A	Yes

**2. Trustees Meeting**

The board of trustees held five (5) meetings during the year ended 31 December 2025. The meetings were held on the dates set out hereunder:

- a) 24 February 2025 – Quarter 4 2024 Trustee Meeting
- b) 27 May 2025 – Quarter 1 2025 Trustee Meeting
- c) 26 August 2025 – Quarter 2 2025 Trustee Meeting
- d) 25 November 2025 – Quarter 3 2025 Trustee Meeting
- e) 30 May 2025 - Scheme Annual General Meeting

**3. Composition of Trustee Board - [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 plans’ operations and governance under the broad headings of “Finance and 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 founder attend these meetings.

**5. Fiduciary responsibility statement**

The corporate trustee is the governing body of the Britam Individual Pension Plan and is responsible for the corporate governance of the plan. The trustee is responsible for ensuring that the administration of the plan is conducted in the best interests of the plan’s members and the sponsor. To achieve this, the trustee embraces its fiduciary responsibility by

- a. Acting honestly and did not improperly use inside information or abuse their 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 funds and the fund’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.

**FUND GOVERNANCE DISCLOSURE STATEMENT (CONTINUED)**

**7. Key outcomes**

The corporate trustees seeks to achieve the following:

- a. Building trust with the members and sponsor of the plan 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 plan's administrative processes remain transparent and accessible to members and the sponsor.

**8. Annual general meeting**

The corporate trustee held the annual general meetings on 30 May 2025 virtually. The board adequately addressed the members' concerns.

**9. Members' sensitization**

No formal scheduled member sensitization meetings were held. However the founder's relationship teams did visit a number of contributing employers during the year and conducted member education and sensitization.

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

**10. Trustees' remuneration policy**

The corporate trustee was remunerated in accordance with the contract between the Trustee, Kingsland Court Trustee Services Limited and the Founder, Britam Life Assurance Company (Kenya) Limited. All expenses except for income tax are borne by the Founder.

**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 31 March 2026 and signed on its behalf by:



**DIRECTOR OF THE CORPORATE TRUSTEE**



## **REPORT OF THE INDEPENDENT AUDITOR TO THE MEMBERS OF BRITAM INDIVIDUAL PENSION PLAN**

### **Report on the audit of financial statements**

#### **Opinion**

We have audited the financial statements of Britam Individual Pension Plan set out on pages 10 to 20, which comprise the statement of net assets available for benefits as at 31 December 2025, statement of changes in net assets available for benefits and notes to the financial statements including a summary of material accounting policy information.

In our opinion, the accompanying financial statements give a true and fair view of Britam Individual Pension Plan net assets available for benefits as at 31 December 2025 and changes in net assets available for benefits for the year then ended in accordance with IFRS<sup>®</sup> Accounting Standards and the requirements of 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 audit of the financial statements section of our report. We are independent of the fund in accordance with the International Ethics Standards Board for Accountants' International code of Ethics for professional Accountants (including international independence standards) (IESBA Code) together with the ethical requirements that are relevant to our audit of the financial statements in Kenya, and we have fulfilled our ethical responsibilities in accordance with 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 of plan information, report of directors of the corporate trustee, statement of directors of the corporate trustee's 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 the directors of the corporate trustee 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 Benefits Act, 1997 and for such internal control as the directors of the corporate trustees 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 BRITAM INDIVIDUAL PENSION PLAN (CONTINUED)**

**Report on the audit of financial statements (continued)**

**Responsibilities of the directors of the corporate trustee for the financial statements (continued)**

In preparing the financial statements, the directors of the corporate trustee are responsible for assessing the 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 plan or to cease operations, or have no realistic alternative but to do so.

The directors of 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 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 skepticism 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 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 directors of the corporate trustees' 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 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 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 BRITAM INDIVIDUAL PENSION PLAN (CONTINUED)**

**Report on the audit of financial statements (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**



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

March 31, 2026

266/26



UNIQUE CODE: 12406260331

**STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS**

	<b>Notes</b>	<b>2025 Shs</b>	<b>2024 Shs</b>
<b>Dealings with members</b>			
Contributions for the year	2(a)	261,753,975	498,072,128
Transfers in from other schemes	2(b)	1,097,980,407	314,095,898
Leavers	2(c)	<u>(597,580,846)</u>	<u>(708,760,385)</u>
<b>Net increase from dealings with members</b>		<u>762,153,536</u>	<u>103,407,641</u>
<b>Return on plan investments income</b>			
Plan investments income	3	820,985,245	701,536,506
Tax	4	<u>(22,700,281)</u>	<u>(67,296,431)</u>
<b>Net return on plan investments</b>		<u>798,284,964</u>	<u>634,240,075</u>
<b>Net increase in net assets available for benefits</b>		1,560,438,500	737,647,716
Net assets available for benefits at start of year		<u>6,076,490,527</u>	<u>5,338,842,811</u>
<b>Net assets available for benefits at end of year</b>		<u><u>7,636,929,027</u></u>	<u><u>6,076,490,527</u></u>

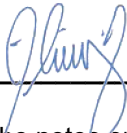
The notes on pages 12 to 20 form an integral part of the financial statements.


Report of the independent auditor - pages 7 to 9.

**STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS**

		As at 31 December	
	Notes	2025 Shs	2024 Shs
<b>ASSETS</b>			
Plan investments	8	<u>7,636,929,027</u>	<u>6,114,735,980</u>
<b>Current liabilities</b>			
Tax payable	5	<u>-</u>	<u>38,245,453</u>
<b>Net assets of the drawdown plan</b>	7	<u><u>7,636,929,027</u></u>	<u><u>6,076,490,527</u></u>

The financial statements on pages 10 to 20 were approved and authorised for issue by the board of directors of corporate trustee on 31 March 2026 and were signed on its behalf by:

 \_\_\_\_\_ **DIRECTOR**

 \_\_\_\_\_ **DIRECTOR**

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

Report of the independent auditor - pages 7 to 9.

## **NOTES**

### **1. Material accounting policy information**

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, 1997. 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 plan applied for the first time certain standards and amendments, which are effective for annual periods beginning on or after 1 January 2024. The plan has not early adopted any other standard, interpretation or amendment that has been issued but is not yet effective.

#### **Amendments to IAS 21 'Lack of Exchangeability' (issued in August 2023)**

The amendments specify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. The amendments also require disclosure of information that enables users of an entity's financial statements to understand how the currency not being exchangeable into the other currency affects, or is expected to affect, the entity's financial performance, financial position and cash flows.

The amendments had no impact on the plan financial statements.

**NOTES (CONTINUED)**

**1. Material accounting policy information (continued)**

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

**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 1 'First-time Adoption of International Financial Reporting Standards' (issued in July 2024), effective for annual reporting periods beginning on or after 1 January 2026, with earlier application permitted, amended paragraphs B5 and B6 of IFRS 1 to include cross references to the qualifying criteria for hedge accounting in paragraph 6.4.1(a), (b) and (c) of IFRS 9. These amendments are intended to address potential confusion arising from an inconsistency between the wording in IFRS 1 and the requirements for hedge accounting in IFRS 9.
- 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 requirements for presentation within the statement of profit or loss, including specified totals and subtotals. Furthermore, entities are required to classify all income and expenses within the statement of profit or loss into one of five categories: operating, investing, financing, income taxes and discontinued operations, whereof the first three are new.

The standard requires disclosure of newly defined management-defined performance measures, subtotals of income and expenses, and it also includes new requirements for 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 plan is currently working to identify all impacts the amendments will have on the primary financial statements and notes to the financial statements.

**NOTES (CONTINUED)**

**1. Material accounting policy information (continued)**

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

**New standards, amendments and interpretations issued but not effective (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 plan plans to apply the change above, if applicable, from its effective date noted above.

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

The preparation of the plan's financial statements requires the corporate trustee to make judgements, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the accompanying disclosures, and the disclosure of contingent liabilities. The estimates and associated assumptions are based on historical experience and other relevant factors. Such estimates and assumptions are reviewed on an ongoing basis. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of assets or liabilities affected in future periods. Revisions to estimates are recognised prospectively.

The corporate trustees have made no assumptions and in their opinion there are no other sources of estimation uncertainty at the end of the reporting period that have a significant risk of resulting in material adjustment to the carrying amount of assets and liabilities

The judgements made by the corporate trustees regarding the income tax status of the scheme are disclosed in Note 1(j).

**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**

This relates to contributions by various members and there is no defined rate of contributions, as defined by the plan's rules.

**NOTES (CONTINUED)**

**1. Material accounting policy information (continued)**

**e) 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 trustees/directors of corporate trustee of the receiving scheme accept the liability.

**f) 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

**g) Financial instruments**

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**

All financial assets are recognised initially using the 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 plan 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

**NOTES (CONTINUED)**

**1. Material accounting policy information (continued)**

**g) Financial instruments (continued)**

***Financial assets (continued)***

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

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.

***Financial liabilities***

**Initial recognition and measurement**

The plan's financial liabilities are classified and measured at amortised cost. All financial liabilities are recognised initially at fair value and, in the case of payables, net of directly attributable transaction costs.

**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) Benefits and payments**

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.



**NOTES (CONTINUED)**

**1. Material accounting policy information (continued)**

**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 Britam Life Assurance Company (Kenya) Limited.

**j) Taxation**

**Corporation Income Tax**

The plan has not recognised a provision for corporation income tax on its investment income for the year ended 31 December 2025. This treatment is based on the trustees' interpretation of the provisions of the Income Tax Act relating to the tax status of registered retirement benefits schemes, as well as a recent court ruling involving a retirement benefit scheme registered with the Retirement Benefits Authority and the Kenya Revenue Authority. The ruling held that income earned by a registered pension scheme is exempt from corporation income tax. In applying this judgement, the trustees have considered the fact that the scheme is a registered with the Retirement Benefits Authority and, therefore, the scheme is exempt from corporation income tax.

This area involves significant judgement due to evolving legal interpretation and regulatory guidance. There is a risk that the tax treatment adopted by the scheme may be subject to future challenge or changes in interpretation.

**Value Added tax (VAT)**

The plan 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.

**NOTES (CONTINUED)**

	<b>2025 Shs</b>	<b>2024 Shs</b>
<b>2. Dealings with members</b>		
(a) <b>Contributions for the year</b>		
Registered	145,516,050	226,554,462
Unregistered	<u>116,237,925</u>	<u>271,517,666</u>
	<u>261,753,975</u>	<u>498,072,128</u>
(b) <b>Transfers in from other schemes</b>	<u>1,097,980,407</u>	<u>314,095,898</u>
(c) <b>Leavers</b>		
Lump sums paid	<u>(597,580,846)</u>	<u>(708,760,385)</u>
<b>Net increase from dealings with members</b>	<u><u>762,153,536</u></u>	<u><u>103,407,641</u></u>
<b>3. Plan investments income</b>		
Interest from funds managed by Britam Life Assurance Company (K) Limited	<u>820,985,245</u>	<u>701,536,506</u>
The plan investments income allocated to the registered and unregistered portions for taxation purposes, can be analysed as follows:		
- registered	759,296,848	477,215,069
- unregistered	<u>61,688,397</u>	<u>224,321,437</u>
	<u><u>820,985,245</u></u>	<u><u>701,536,506</u></u>
<b>4. Tax</b>		
Tax charge - unregistered scheme	<u>-</u>	<u>67,296,431</u>
Tax is charged on investment income earned from the unregistered portion at the rate of 30% (2024: 30%).		
Total plan investments income	820,985,245	701,536,506
Less: income relating to portion within allowable limits (Note 3)	<u>(820,985,245)</u>	<u>(477,215,069)</u>
Less: expenses	<u>-</u>	<u>-</u>
Taxable income	<u>-</u>	<u>224,321,437</u>
Tax thereon at 30% (2024: 30%)	<u>-</u>	<u>67,296,431</u>
<b>5. Tax payable/(recoverable)</b>		
At start of year	38,245,453	(5,542,157)
Charge for the year	-	67,296,431
Paid in the year	<u>(38,245,453)</u>	<u>(23,508,821)</u>
At end of year	<u>-</u>	<u>38,245,453</u>
<b>6. Administrative expenses borne by sponsor</b>		

Administrative expenses comprising of audit fees and RBA levy are borne by the sponsor.

**NOTES (CONTINUED)**

<b>7. Net assets of the plan</b>	<b>2025 Shs</b>	<b>2024 Shs</b>
The movement in the net assets of the plan is as follows:		
At start of year	6,076,490,527	5,338,842,811
Contributions for the year(Note 2(a))	261,753,975	498,072,128
Transfer in for the year (Note 2(b))	1,097,980,407	314,095,898
Leavers (Note 2(c))	(597,580,846)	(708,760,385)
Plan investments income (Note 3)	820,985,245	701,536,506
Tax (Note 4)	<u>(18,506,519)</u>	<u>(67,296,431)</u>
At end of year	<u><u>7,641,122,789</u></u>	<u><u>6,076,490,527</u></u>

**8. Plan investments**

At start of year	6,114,735,980	5,333,300,654
Contributions received	261,753,975	498,072,128
Transfer in for the year (Note 2(a))	1,097,980,407	314,095,898
Leavers (Note 2(b))	(597,580,846)	(708,760,385)
Plan investments income (Note 3)	820,985,245	701,536,506
Tax paid in the year (Note 5)	<u>(60,945,734)</u>	<u>(23,508,821)</u>
At end of year	<u><u>7,636,929,027</u></u>	<u><u>6,114,735,980</u></u>

The plan investments comprise managed funds invested with Britam Life Assurance Company (K) Limited. Interest is credited to members at rates declared by the insurance company.

The plan investments are carried at the ultimate redemption value. The plan has a minimum guarantee rate of 5%.

**9. Tax status of the scheme**

British-American Insurance Company (Kenya) Limited, Individual Provident Fund is exempted from income tax on its investment income up to the statutory limit. Any contributions above the statutory limit are subject to tax.

**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 directors of the corporate trustee and investment managers identify, evaluate and hedge financial risks.

**NOTES (CONTINUED)**

**10. Financial risk management objectives and policies (continued)**

**Market risk**

*Interest rate risk*

During the year 31 December 2025, 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. 61,729,133 (2024: Shs. 48,787,698) higher arising mainly as a result of increase in the guaranteed fund. The sensitivity is higher in 2025 than in 2024 because of a increase in the plan investments for the year.

**Credit risk**

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

**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.

**11. Fund management**

The plan's objectives when managing the fund are:

- to comply with the Retirement Benefits (individual Retirement Benefits Schemes) Regulations, 2000 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 directors of the corporate trustee 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 fund balances. Prudent liquidity risk management implies maintaining sufficient cash and marketable securities.

**12. Registration**

The 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 Shilling (Shs.)