# Guide to Starting a Retirement Benefits Scheme



#### **CORE MANDATE**

- (i) Regulate and supervise the establishment and management of retirement benefits schemes;
- (ii) Protect the interests of members and sponsors of schemes;
- (iii) Develop and promote the retirement benefits sector;
- (iv) Advise the Government on matters relating to retirement benefits; and,
- (v) Implement all Government policies relating thereto.

#### VISION

A dynamic and secure retirement benefits sector.

#### MISSION

To develop, safeguard and deliver value to the retirement benefits sector through excellence in service delivery.

#### **CORE VALUES**

- (i) Firmness and fairness
- (ii) Transparency and accountability
- (iii) Innovation and dynamism
- (iv) Proficiency in quality service delivery
- (v) Integrity

#### **QUALITY POLICY**

Developing and Safeguarding the Retirement Benefits Sector through:

- 1. Commitment to continued excellence in service delivery;
- Upholding professionalism, integrity and sensitivity to Stakeholder interests;
- 3. Operating a quality management system within the framework of iso 9001:2008 standards;
- 4. Continual improvement of the quality management system.



#### INTRODUCTION

This guide is intended for employers who would like to start an occupational retirement benefits scheme for their workers, or would like to assist their workers to join an individual retirement benefits scheme. It is also tailored for workers who wish to join individual retirement benefits schemes directly.

#### WHY START A RETIREMENT BENEFITS SCHEME?

As an employer ponders the cost of starting a scheme, some of the benefits to consider include the following:

# The scheme will aid the employer in recruitment and retention of the cutting-edge human resources.

Today, potential employees want to know whether a potential employer has a pension arrangement in place for them. In addition, highly experienced and qualified individuals are increasingly gravitating towards employers who have generous pension arrangements.

### Providing reward/motivation for employees

Where a pension arrangement is absent, employees may opt to pursue their own arrangements, some of which may affect their concentration at work.

# Tax-efficient remuneration

- (i) Contributions for pension up to a certain limit (30% of an employee's salary or Kshs. 240,000 per annum) are tax-exempt. In this regard, starting a pension scheme for employees is equivalent to giving them a tax free pay raise;
- (ii) All investment income earned by a scheme is tax-free;
- (iii) Kshs.15,000 per month (Kshs. 26,000 if the pensioner has no other income) of pension income is tax free;
- (iv) Pension income earned by persons aged 65 years and above is tax-free;
- (v) Kshs. 600,000 of any lump sum retirement benefit is tax-free; and,
- (vi) At retirement age, or after 15 years membership, taxation on benefits exceeding the tax-free amounts is at a much lower rate than it is for any other income.



#### STEPS TO SETTING UP A RETIREMENT BENEFITS SCHEME

#### RESOLUTION

To begin with, the sponsor (employer) should resolve to start the retirement benefits scheme. In the case of a limited company, a board resolution is required. It is important that the employer originates the idea or at least buys the idea from the employees because of the financial obligations on the employer.

#### **ACTUARIAL REVIEW**

The second step is actuarial review, in which the general financial potential of the scheme is looked into. Schemes differ widely in nature and design. On one hand, an employer has the option of starting a pension scheme (which will pay monthly pensions or both monthly pensions and lump sum benefits upon retirement), or a provident fund (which pays lump sum benefits at retirement). With regard to design, an employer may start a defined benefits scheme (whose benefits are pegged on the years of service within a firm and the salary at retirement) or a defined contribution scheme (whose benefits is the sum of the employee's contributions, employer's contributions and investment income).

It is, therefore, important that the scheme's financial viability, contribution rates, nature and design be endorsed by an actuarial review carried out by a qualified actuary. The purpose of the actuarial investigation is to advise on the design and level of contributions that will achieve and sustain the required level of scheme solvency and ability to meet its future obligations.

#### TRUST DEED AND RULES

For adequate protection of the sponsor and members, the Retirement Benefits Act requires that schemes should be established by an irrevocable trust, and that the scheme documents be professionally prepared.

A scheme will therefore be a 'trust' which can be defined as 'an equitable obligation, binding a person (a trustee) to deal with property over which he has control (the trust property) for the benefit of persons (beneficiaries) of whom he may himself be one'. The scheme must therefore be created through the trust deed and rules. It is important to note that this document must be created within the provisions of the Retirement Benefits Act.

The trust deed and rules is the document that created the trust and can be considered to be the constitution of the scheme. It is necessary to obtain professional advice on its preparation as it is an extremely important document.



It contains rules and operational details of the scheme and everything that a member needs to know about the scheme. If possible, this document should be summarized into a small booklet and distributed to members at the inception of the scheme.

#### APPOINTMENT OF TRUSTEES

After the preparation of the trust deed and therefore the establishment of the right nature and design of the scheme, the sponsor (employer) can then appoint trustees, one-third of whom must be nominated by the members in a defined benefit scheme. In a contribution scheme, half of them must be member-nominated. In the event that the employer does not want to appoint member trustees, he can appoint a corporate trustee (a body corporate) to run scheme affairs. Trustees are classes of persons appointed under an irrevocable trust to hold the scheme fund in trust for the benefit of members. The regulations provide that there should be at least 3 trustees (unless a corporate trustee is appointed).

On the acceptance of the trust, the trustees have the following duties:

- (i) A fundamental duty to administer the scheme in line with the trust deed and rules, which must be within the provisions of the Retirement Benefits Act.
- (ii) To keep proper books of accounts and allow the beneficiary and the sponsor to inspect them. They must also, on demand, give the beneficiary information and explanations as to the investments and dealings with the trust property.
- (iii) To liaise with service providers who are important players in the running of the scheme.
- (iv) To assume the duties of a trustee for as long as the period of the trusteeship. The law does not distinguish between active and passive trustees, and a trustee is fully liable to the beneficiaries for any loss that occurs even where the management has been delegated to a third party.
- (v) To be bound by the decisions of the trust. Unless stated otherwise in the trust deed, all decisions of the trustees must be made by all of them. If the rules provide for a majority decision, then that decision binds the minority.
- (vi) To be jointly and severally liable for the decisions of the Trust. An aggrieved party may elect to sue one, some, or all of the trustees for redress.

#### REGISTRATION OF SCHEMES WITH THE AUTHORITY

Registration of schemes is mandatory and free for schemes. It needs to be noted that it is an offence to operate a scheme without registration. This, on conviction, may attract a maximum fine of Kshs. 500,000, imprisonment for a term of two years, or both. The Authority issues a certificate and keeps a register of all the registered schemes. Application forms for registration are available at RBA offices, Rahimtulla Towers, Upper Hill Road. These forms can also be downloaded from the RBA website at <a href="https://www.rba.go.ke">www.rba.go.ke</a>.



The following attachments must accompany the form for registration of a new scheme:

- (i) Trust deed and rules;
- (ii) Fund management agreement;
- (iii) Custody agreement;
- (iv) Actuarial certification (defied benefit schemes only); and,
- (v) Administration agreement.

The Authority shall consider the application and notify the applicant in writing whether or not the scheme is eligible for registration. If a scheme satisfies all the requirements for registration, the Authority will forward to the scheme a certificate of registration.

# COMMENCEMENT OF CONTRIBUTION AND APPOINTMENT OF SERVICE PROVIDERS

Upon registration, the trustees should appoint service providers while the sponsor should commence remitting both the employer's and the employee's contributions. The Retirement Benefits Act specifies various key parties who are required in the establishment and operation of a retirement benefits scheme. The principal parties are members, sponsors and trustees. However, there are also other important but secondary parties in this regard. These include managers and custodians. Finally, other professionals will often be required to prepare statutory reports and documents for schemes. The most notable categories include administrators, actuaries, legal advisors and auditors.

#### THE FUND MANAGER

The manager advises the trustees on available investment vehicles and expected risk and returns for each. The manager makes tactical asset allocation decisions based on the strategic asset allocation contained in the investment policy and RBA guidelines. The manager also undertakes research at company, sector and country levels, manages the portfolio so as to ensure liquidity and thus ability to meet the scheme's needs, and provides accurate and timely periodic reports to the trustees and the Authority on scheme holdings and transactions. The general obligations of the manager include:

- (i) Submitting quarterly investment reports;
- (ii) Sitting in attendance in board of trustees' meetings convened to discuss an agenda involving investment of scheme funds;
- (iii) Issuing instructions on behalf of trustees to custodians to effect payments;
- (iv) Keeping or causing to be kept records and statements of investment transactions; and,
- (v) Whistle-blowing, including, with regard to contributions remittance outstanding for more than 30 days.



#### THE CUSTODIAN

The custodian must be a corporate body - almost always a bank - and is mandated to:

- (i) Hold all the assets of the scheme including cash, securities, title documents and deeds:
- (ii) Settle all transactions in accordance with the instructions received from the manager;
- (iii) Receive and record all dividend, interest and other income due to the scheme and credit them to the scheme; and.
- (iv) Provide accurate and timely periodic reports to the trustees and the Authority on holdings and transactions.

*NB*: The regulations provide that custodians should be registered by the Authority.

#### THE ADMINISTRATOR

The administrator must be a corporate body or a natural person, and is mandated to:

- (i) Carry out daily administration of the affairs of the scheme in accordance with the provision of the Act, scheme trust deed and rules, and keep scheme records;
- (ii) Co-ordinate meetings, submission of regulatory documents, facilitation of entry into and exit from the scheme, prepare scheme budgets, training of trustees, members, and sponsors; and,
- (iii) Provide data to service providers, give statements and computation of benefits, and conduct whistle-blowing as necessary.

**NB**: The regulations provide that administrators be registered by the Authority.

#### OTHER SERVICE PROVIDERS

Schemes may from time to time make use of other relevant professionals whose services are not regulated by the Authority. These include lawyers, actuaries and auditors.

The administrator is mandated with the responsibility of handling all administrative affairs of a retirement benefits scheme (including application); ensuring that the scheme is run in accordance with the trust deed and rules; and, ensuring that the scheme is run within the Law. This role may be performed in-house by staff of the sponsor, by trustees or by contracted professionals with proven competence and capacity to perform the role.

The actuaries play an advisory role as to the set-up of the scheme fund and conduct periodic reviews on funding adequacy of the scheme in relation to its benefits liabilities.



Schemes should also enlist the services of legal advisors during the setting up of the trust deed and the rules of the scheme. Finally, auditors should periodically review the financial records of the scheme.

#### INDIVIDUAL SCHEMES

Individual schemes have been set up to cater for employees whose employers have not set up retirement benefits schemes, or those in the informal sector. Where the number of employees is very small, it may not be financially viable to run an occupational scheme, in which case the employer may opt to contribute to an individual scheme on behalf of the employees. Whereas the individual employer may not have much say in regard to the running of the scheme, there is the definite advantage that costs are shared with other members and the assurance that schemes are managed according to the RBA Rules and Regulations. Individual schemes also enjoy all the tax advantages enjoyed by occupational schemes.

# WHY SAVE THROUGH A RETIREMENT BENEFITS SCHEME? Higher Returns

There are distinct ways in which a retirement benefits scheme enables employees enjoy greater benefits than other forms of savings:

- (i) In the case of occupational retirement benefits scheme both member and sponsor (employer) contribute to the fund all to the eventual benefit of members:
- (ii) Member contributions to registered retirement benefits schemes are taxdeductible. For example, if a member earn Kshs. 50,000 and contribute Kshs. 5,000 to a registered scheme, the PAYE income tax will be calculated on Kshs. 45,000 and not Kshs. 50,000 yet the contribution of Kshs. 5,000 still belongs to him/her; and,
- (iii) Contributions made into a retirement benefits scheme can be invested in longterm assets so as to earn optimal returns over a period of time. Schemes are by law required to diversify their investments thereby reducing investment risk. All investment income earned by registered retirement benefits schemes is tax free, hence generating bigger funds for re-investment. On the other hand if you invest directly, say in treasury bills or bank deposits, you will be required to pay withholding tax on the interest that you earned.



### Payment of Benefits

If one is a member of a pension scheme, then on attainment of retirement age, the scheme will pay him/her a monthly pension for the rest of his/her life no matter how long he/she lives. The member can also commute up to one-third of the total benefits due from a pension scheme into a lump-sum payment. If one is a member of a provident fund, then on achieving retirement age one will be paid a lump sum which if one invest wisely can also provide you with income for the rest of your life.

### Access to benefits on leaving service

If one has been a member of a scheme for less than one year, he/she is entitled to benefits vested in him/her. To encourage saving for retirement, if one has been a member of a scheme for more than one year and leaves employment before attaining retirement age, he/she will access own contributions, plus 50% of employer's contribution. In a defined benefits scheme he/she will access 50% of accrued benefits. The balance of employer's portion remains in the scheme and will continue earning interest payable on attaining the retirement age for the scheme. However, should one retire on grounds of ill health, subsequently fall ill before retirement age or permanently emigrate out of the country, he/she will be allowed to access full benefits. He/she also has the option of transferring benefits to another retirement benefits scheme of choice.

#### Member-level involvement

Members of occupational schemes are now able to participate and influence the scheme's operations, unlike in the past. Half of the board of trustees in defined contribution schemes and one-third in defined benefits schemes must be nominated directly by members. In addition, members are entitled to attend AGMs, receive their annual benefit statements, and summaries of the schemes audited account statements, from which they can monitor the usage of their funds.

#### **Professionalism**

All schemes must contract the expert services of fund managers to invest the scheme funds and custodians to settle all transactions and hold the scheme assets. These professionals ensure that investment returns are maximized and members' funds are secure even if the employer's company winds-up.

# Security of retirement benefits

The retirement benefits vested to an employee cannot be attached by any person. For example, an employer cannot recover any amounts that the employee owes to the company from his/her retirement benefits without the member's express written authorization.



# HOW TO SAVE THROUGH A RETIREMENT BENEFITS SCHEME

The employee should inquire from the employer if the latter has a retirement benefits scheme, if not, he/she should try to encourage the employer to start one. Alternatively, he/she may join an individual retirement benefits scheme.

The appendix attached shows registered Administrators, Fund Managers, Custodians and individual retirement benefits schemes. The employee should consult widely and select the most suitable one.



# **REGISTERED ADMINISTRATORS**

	REGISTERED ADMINISTRATORS - 2016	TELEPHONE	PERMANENT ADDRESS	PHYSICAL LOCATION
1	Alexander Forbes Financial Services (EA) Limited	4969000	52439-00200, NAIROBI	Landmark Plaza, Argwings Kodhek Road
2	Aon Kenya Insurance Brokers Limited	4975000	20102-00200, NAIROBI	Aon House, off Nyerere Road
3	APA Life Assurance Limited	3641000	30389-00100, NAIROBI	Apollo Centre, Ring Road, Westlands
4	British-American Insurance Company (K) Limited	2833000	30375-00100, NAIROBI	British American Centre, Upper Hill
5	Chancery Wright Insurance Brokers Limited	2721555	55537-00200, NAIROBI	Crawford Park, State House Road
6	Chester Insurance Brokers Limited	3750554	66795-00800, NAIROBI	3rd Floor, Sclaters House, Parklands Road
7	CIC Life Assurance Limited	2823000	59485-00200, NAIROBI	CIC Plaza, Mara Road
8	Eagle Africa Insurance Brokers Kenya Limited	4946000	30076-00100, NAIROBI	Longonot Road, Upper Hill
9	ITSL Trust Company Limited	2750000	46143-00100, NAIROBI	ICEA Lion Centre, 4th Floor, Riverside Park, Chiromo Road
10	Kenindia Assurance Company Limited	2228755	44372-00100, NAIROBI	Kenindia Assurance, Loita Street
11	Kenya Orient Life Assurance Limited	2728603	34530-00100, NAIROBI	Capitol Hill Towers, Cathedral Road
12	Kingsland Court Benefits Services Limited	2711461	10285-00100, NAIROBI	Old Mutual Building, Mara/Hospital Road
13	Liaison Financial Services Limited	0703071000	58013-00200, NAIROBI	Liaison House, Statehouse Avenue
14	Liberty Life Assurance Kenya Limited	2866000	30364-00100, NAIROBI	CFC House, Mamlaka Road
15	Liberty Pension Services Limited	2788000	52840-00200, NAIROBI	1st Floor, Suite D2, Morningside Office Park, Ngong Road
16	Madison Insurance Company Kenya Limited	2864000	47382-00100, NAIROBI	Madison Insurance House, Upper Hill
17	Octagon Pension Services Limited	0708 726830	10034-00100, NAIROBI	Mayfair Business Centre, off Parklands Road
18	Pacific Insurance Brokers (EA) Limited	2586568	50565-00200, NAIROBI	Rose Avenue, off Denis Pritt
19	Pan Africa Life Assurance Limited	2781000	44041-00100, NAIROBI	Pan Africa House, Kenyatta Avenue
20	Pioneer Assurance Company Limited	2220814	20333-00200, NAIROBI	Pioneer House, Moi Avenue
21	Roberts Insurance Brokers Limited	2464558	73415-00200, NAIROBI	1st Floor, Top Plaza, Kindaruma Road
22	Saham Assurance Company Kenya Limited	2243681	20680-00200, NAIROBI	16th Floor, Ecobank Towers, Muindi Mbingu Street
23	Sapon Insurance Brokers Limited	6007324	47628-00100, NAIROBI	2nd Floor, West End Place, Off Langata/Mbagathi Round About
24	Sedgwick Kenya Insurance Brokers Ltd.	2723088	40709-00100, NAIROBI	ZEP Re Place, Longonot Rd, Upper Hill
25	Takaful Insurance of Africa Limited	2725134	1811-00100, NAIROBI	CIC Plaza,Mara Road,Upper Hill
26	The Jubilee Insurance Company of Kenya Limited	3281000	30376-00100, NAIROBI	Jubilee Insurance House, Wabera Street
27	The Kenyan Alliance Insurance Company Limited	2227723	30170-00100, NAIROBI	Chester House, Koinange Street
28	UAP Life Assurance Limited	2850000	23842-00100, NAIROBI	Bishops Garden Towers, Bishops Road
29	Zimele Asset Management Company Limited	1 2246273	76528-00508, NAIROBI	ECO Bank Towers, Muindi Mbingu Street

# **REGISTERED FUND MANAGERS**

	REGISTERED FUND MANAGERS 2016	TELEPHONE	PERMANENT ADDRESS	PHYSICAL LOCATION
1	African Alliance Kenya Investment Bank Limited	2762000	27639-00506, NAIROBI	4th Floor, Kenya Re Towers, Upper Hill
2	Alpha Africa Asset Managers Limited	2595448	34530-00100, NAIROBI	Crawford Business Park, 4 <sup>th</sup> Floor Suite 26, State House Road
3	Amana Capital Limited	2351738	9480-00100,NAIROBI	Block C, Suite C5, Saachi Plaza, Argwings Kodhek Rd
4	Apollo Asset Management Company Limited	3641000	30389-00100,NAIROBI	Apollo Centre, Ringroad, Westlands
5	British-American Asset Managers Limited	2833000	30375-00100,NAIROBI	Britam Centre, Upper Hill
6	CBA Capital Limited	2884444	30437-00100, NAIROBI	CBA Centre, Mara & Ragati Roads
7	CIC Asset Management Limited	2823000	59485-00200, NAIROBI	8th Floor, CIC Plaza II , Mara Road
8	Co-op Trust Investment Services Limited	3276000	48231-00100,NAIROBI	Co-operative Bank House, Haile Selassie Avenue
9	Dry Associates Limited	4450520	684-00606, NAIROBI	Dry Associates House, Brookeside Groove, Waiyaki Way
10	Fusion Investment Management Limited	2738460	47538-00100, NAIROBI	1st Floor, ACK Garden House, 1st Ngong Avenue
11	Genafrica Asset Managers Limited	2323343	79217-00200, NAIROBI	1st Floor, Arlington Block, 14 Riverside Drive, Westlands
12	ICEA Lion Asset Management Limited	2221652	46143-00100, NAIROBI	ICEA Lion Centre, 4th Floor, Riverside Park, Chiromo Road
13	Kenindia Asset Management Company Limited	316099	44372-00100, NAIROBI	Kenindia House, Loita Street
14	Madison Asset Management Services Limited	2864502	20092-00100, NAIROBI	Madison Insurance House, Upper Hill Road
15	Old Mutual Investment Group Limited	2829000	11589-00400, NAIROBI	Old Mutual Building, Corner, Mara/Hospital Road
16	Pinebridge Investments East Africa Limited	4967000	67262-00200, NAIROBI	Africa Re Centre, Hospital Road, Upper Hill
17	Pan Africa Asset Management Limited	0722634717	7848-00100, NAIROBI	1st Floor, Pan Africa Life House, Kenyatta Avenue
18	Stanlib Kenya Limited	3268508	30550-00100, NAIROBI	Liberty House, Mamlaka Road
19	UAP Investments Limited	2850000	43013-00100, NAIROBI	I & M Bank House, 2nd Ngong Avenue
20	Zimele Asset Management Company Limited	2246273	76528-00508, NAIROBI	Fedha Towers, Muindi Mbingu Street

# **REGISTERED CUSTODIANS**

	REGISTERED CUSTODIANS - 2016	TELEPHONE	PERMANENT ADDRESS	PHYSICAL LOCATION
1	Bank of Africa Kenya Limited	3275000	69562-00400, NAIROBI	Reinsurance Plaza, Taifa Road
2	CfC Stanbic Bank Limited	3638000	72833-00200, NAIROBI	CFC Stanbic Centre, Chiromo Road, Westlands
3	Chase Bank Kenya Limited	2774000	66049-00800, NAIROBI	Chase Bank, Riverside Drive, Chiromo Road
4	Equity Bank (Kenya) Limited	2262000	75104-00200, NAIROBI	Equity Bank Centre, Upper Hill
5	I & M Bank Limited	3221000	30238-00100, NAIROBI	I & M Bank House, 2nd Ngong Avenue
6	Kenya Commercial Bank Limited	3270000	30664-00100, NAIROBI	3rd Floor, Piedmont Plaza, Ngong Road
7	National Bank of Kenya Limited	253275	72866-00200, NAIROBI	National Bank Building, Harambee Avenue
8	NIC Bank Limited	2888000	44599-00100, NAIROBI	NIC House, Masaba Road, off Uhuru Highway
9	Prime Bank Limited	4203000	43825-00100, NAIROBI	Prime Bank, Riverside Drive, Chiromo
10	Standard Chartered Bank Kenya Limited	3293000	30003-00100, NAIROBI	Standard Chartered Bank Head Office, Chiromo, Westlands
11	The Co-operative Bank of Kenya Limited	3276149	48231-00100, NAIROBI	Co-operative Bank House, Haile Selassie Avenue

# INDIVIDUAL RETIREMENT BENEFITS SCHEMES REGISTERED WITH RBA

	NAME	ADDRESS	TOWN
1	Alexander Forbes (Vuna Personal Pension Plan)	52439-00200	Nairobi
2	Amana Personal Pension Plan	9480-00100	Nairobi
3	Apollo Insurance Co. Ltd. Individual Pension Arrangement	30389	Nairobi
4	Blue MSMEs Jua Kali Individual Retirement Benefits Scheme (Mbao Pension Plan)	30664-0000	Nairobi
5	British American Personal Pension Plan	30375	Nairobi
6	CFC Life Individual Pension Plan	30364-00100	Nairobi
7	Chancery Personal Pension Plan	55537-00200	Nairobi
8	CIC (Jipange Personal Pension Plan)	59485-00200	Nairobi
9	Co-opTrust Individual Retirement Benefits Scheme	48231-00100	Nairobi
10	Dry Associates Personal Provident Plan	684-00606	Nairobi
11	Eagle Africa Maisha Milele Pension Plan	30076-00100	Nairobi
12	Friends Personal Pension Plan	13224-00100	Nairobi
13	GA Life Personal Provident Plan	42166-00100	Nairobi
14	GA Life Personal Pension Plan	42166-00100	Nairobi
15	ICEA Lion Individual Retirement Benefits Scheme	46143	Nairobi
16	Intime Personal Pension Plan	3848-00506	Nairobi
17	Jubilee Insurance Company Ltd Personal Pension Plan	30376	Nairobi
18	Kenindia Assurance Co. Ltd. Personal Pension Plan	30377	Nairobi
19	Kenyan Alliance Insurance Co.Ltd. Individual Retirement Benefits Scheme	30170	Nairobi
20	CPF Individual Pension Scheme	28938-00200	Nairobi
21	Liaison Personal Retirement Plan	58013-00200	Nairobi
22	Liberty Personal Pension Scheme	52840-00200	Nairobi
23	Madison Insurance Personal Pension Plan	47382	Nairobi
24	Mercantile Personal Provident Fund Scheme	20680-00200	Nairobi
25	The Heritage AII Company Ltd. Individual Retirement Benefits Scheme	30390-00100	Nairobi
26	The Kenya Orient Individual Pension Plan	34530-00100	Nairobi
27	The Monarch Personal Pension Plan	44003	Nairobi
28	Octagon Personal Pension Scheme	10034-00100	Nairobi
29	Old Mutual Individual Retirement Benefits Scheme	30059-00100	Nairobi
30	Pan Africa Life Personal Pension Plan	44041-00100	Nairobi
31	Pioneer Assurance Individual Retirement Benefits Scheme	20333-00200	Nairobi
32	Stanlib Individual Pension Plan	30550-00100	Nairobi
33	UAP Life Assurance Individual Retirement Benefits Plan	43013-00100	Nairobi
34	Zimele Personal Pension Plan	76528-00508	Nairobi







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