Deloitte.



Audit Regulatory Transparency Report Deloitte & Touche Kenya

30 September 2019

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Scope of this report

This report sets out the practices and processes that are currently employed by Deloitte & Touche Kenya, in accordance with the requirements of Article 13 of the European Union's Regulation 537/2014 on specific requirements regarding statutory audit of public-interest entities.



Leadership message

Deloitte & Touche Kenya leadership message



Anne Muraya East Africa Audit Leader

Welcome to the second edition of the Deloitte & Touche Kenya's (hereinafter referred to as "Deloitte Kenya") Audit Regulatory Transparency Report for the year ended 31 May 2019.

Audit regulatory transparency is vital in creating and maintaining trust between the firm, its clients and the general public. In line with this, Deloitte has developed global compliance processes to ensure that every service provided to our clients complies with the regulatory requirements applicable to the client concerned. These processes are applied consistently across our business.

Deloitte Kenya endeavours to uphold professionalism by attesting to accomplishments and challenges as well as helping to assure strong foundations for future aspirations. We illuminate the what, how and why of change so that our clients are always ready to act ahead.

We are living in a fast-changing environment especially when it comes to technological advancement. Technology continues to be a catalyst in improving audit processes and increasing efficiency in the profession. Deloitte Kenya is at the forefront in embracing technology in our work and we are excited to be part of the digital evolution.

We continue to transform the way we audit through re-imagination, embracing technology and adapting to the changing environment. Deloitte Kenya is committed to continuously building a culture of quality and excellence in audit in the region and beyond.

I hope that you find this report interesting and insightful.

Anne Muraya

East Africa Audit Leader Deloitte and Touche Nairobi, Kenya

Throughout this report, the terms "Deloitte, we, us, and our" refer to one or more of one or more of Deloitte Touche Tohmatsu Limited, its network of member firms, and their related entities. For more information about the Deloitte network, please see p. 3 or https://www2.deloitte.com/global/en/pages/about-deloitte/articles/about-deloitte.html.

Africa leadership message



Andrew Mackie Managing Partner Audit & Assurance

Deloitte Africa

State of the profession

The expectation gap facing the audit profession has never been greater and must be addressed. It is however important that we focus not only on what is broken in the profession, but that we focus on the entire financial reporting ecosystem.

We support a complete overhaul of the financial reporting ecosystem and would endorse the introduction of separate legislation that governs all players involved, including management, those charged with governance and auditors, and establishes a "super-regulator" to regulate the entire financial reporting ecosystem, with powers to effect swift justice.

It is of particular importance that regulators and the players involved in the financial reporting ecosystem shift their gaze to our global counterparts to identify which global initiatives are yielding successful results. A good example is the implementation of Sarbanes-Oxley in the United States, where it can be argued that the ultimate consequence, which is criminal sanction, is what drives its effectiveness. This recognises that it is not about the audit profession deflecting, but that all players should be subject to the same type of sanction, as all players are entrusted with an element of responsibility in the process of safeguarding others' money.

We welcome the anticipated International Standard on Quality Management 1 and believe that if properly implemented, it will result in increased audit quality across the profession. The cost of compliance is anticipated to be significant and will require the implementation of systems and processes in order to comply with the standard. The cost of such compliance, whilst necessary, will ultimately be borne by clients.

At Deloitte

We have invested heavily in improving our risk sensing mechanisms and machinery. As a consequence of our lessons learnt over the last few years, we have reflected on what we could have done differently to improve our ability to foresee issues prior to signing an audit opinion. The result of this reflection has been the development of a specialised risk sensing team, half of which, by design, are not auditors, but are trained in equity analysis and similar disciplines. We now spend more time thinking about the financial statements, on which we opine, through the eyes of investors, analysts and other stakeholders, adding to the breadth of insight that we are able to bring to our clients. The profession has required us to change and we have responded by changing the level and depth of our skills and competence.

We continuously consider our client portfolio in terms of the label, "The Company We Keep", thereby ensuring that the company we keep remains appropriate. In this regard we have terminated our relationship with a number of clients, who did not meet our increasingly stringent requirements for being a Deloitte client.

The profession is in a state of flux. Deloitte welcomes the focus and the scrutiny. We acknowledge the role we play in the capital markets. A stronger profession, with a significantly narrowed expectation gap, is vital for all role players in the financial reporting ecosystem.



Deloitte network

Deloitte & Touche Kenya legal structure and ownership

Deloitte & Touche Kenya is connected to the Deloitte network through the Deloitte Pan African Trust, a member firm of Deloitte Touche Tohmatsu Limited. Deloitte & Touche Kenya is referred to throughout this report as "Deloitte & Touche Kenya", and Deloitte Pan African Trust is referred to throughout this report as "Deloitte Africa". Deloitte Africa holds practice rights to provide professional services using the "Deloitte" name which it extends to Deloitte entities within its territory, comprised of practice offices in Botswana, Burundi, Ghana, Kenya, Malawi, Mozambique, Namibia, Nigeria, South Africa, Tanzania, Uganda, Zambia, Zimbabwe and territorial rights over Ethiopia, Lesotho, Rwanda and Swaziland.

Deloitte Kenya is authorised to serve as an auditor for clients in Kenya, Institute of Certified Public Accountants of Kenya (ICPAK) registration number PF/0004. Our audit firm operates as a partnership and is established under Kenyan law, with the head office registered at Deloitte Place, Waiyaki way, Muthanagri P.O. Box 40092-00100, Nairobi Kenya

The Deloitte network

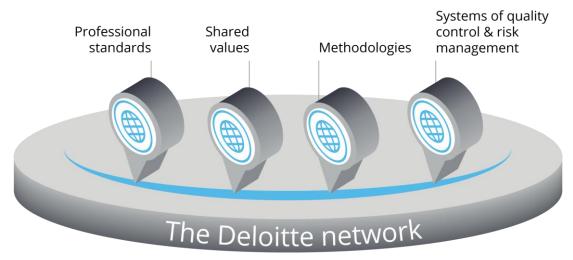
The Deloitte network is a globally connected network of member firms and their affiliates operating in more than 150 countries and territories across the world. These separate and independent member firms operate under a common brand.

Deloitte Touche Tohmatsu Limited (DTTL or Deloitte Global)

Deloitte Touche Tohmatsu Limited is a UK private company limited by guarantee. DTTL serves a coordinating role for its member firms and their affiliates by requiring adherence to policies and protocols with the objective of promoting a consistently high level of quality, professional conduct and service across the Deloitte network. DTTL does not provide professional services to clients, or direct, manage, control or own any interest in any member firm or any member firm's affiliated entities.

For more information about the Deloitte network, please see: About Deloitte.

Network description

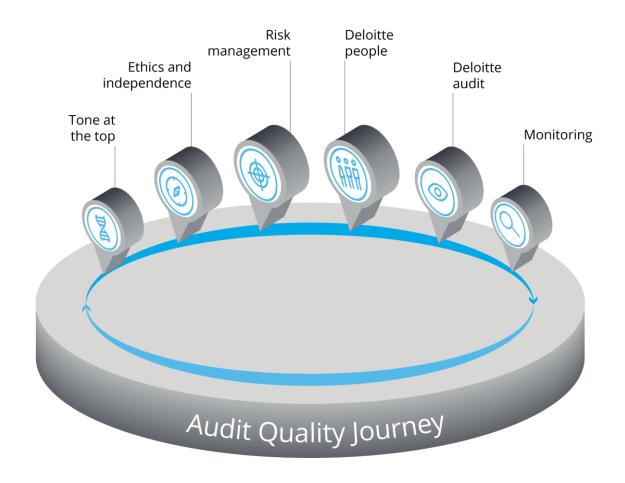


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The Deloitte audit quality journey

The Deloitte Audit Quality Journey







Tone at the top

Refreshed shared values.

Our commitment to the highest standards of audit quality is in our DNA.

We continue to set a **strong tone at the top**, in particular regarding ethics, quality and compliance with the firm's policies and procedures.

Through our refreshed **Shared Values** we are able to serve our clients, our people and our communities in a way that is consistently and unmistakably Deloitte. (1) We lead the way, (2) We serve with integrity, (3) We take care of each other, (4) We foster inclusion, and (5) We collaborate for inclusion.

We provide strong support to audit partners who face matters headon. We publicly recognise and acknowledge the role of the partner. Our partners know this, and are proud of our leadership stance.

Deloitte Africa Board

Our Board is constituted in terms of a partnership agreement and is elected by the partner and directors every three years. In accordance with best practice corporate governance, we insist on a separation between the board of partners and directors and the executive management.

Roles and responsibilities

- Ongoing oversight and monitoring of Deloitte Africa's adherence to ethics, laws and regulations
- Promotion and protection of partner and director interests and overseeing management
- Determine Deloitte Africa's long-term strategies, with specific oversight of risk and quality.

Deloitte Africa Audit Executive Committee

Our Audit Executive Committee is responsible for the governance and oversight of the Audit & Assurance service line.

Roles and responsibilities

- Sets the strategic direction and focus areas
- Approves the service line's business strategy
- Approves the allocation of units and earnings to partners
- Approves the financial aspects of business plans.

Deloitte Africa Executive Committee

Our Executive Committee is led by our Chief Executive Officer and consists of the Deputy Chief Executive Officer, the Chief Operating Officer, Reputation & Risk Leader, Talent & Transformation Leader, service line managing partners or directors and Africa regional leaders.

Roles and responsibilities

- Assisting the Chief Executive Officer in managing Deloitte Africa
- Implementing policies and strategies of Deloitte Africa as approved by the Africa Board
- Retaining the authority to manage the day-to-day operations of Deloitte Africa
- Planning Deloitte Africa's future development.

Deloitte Africa Audit Risk and Quality Committees

The below committees are responsible to ensure audit quality is our first priority:

- Africa Audit Quality Board
- Audit Learning Board
- Africa Audit Risk Committee.

Members of the Deloitte Africa Audit Executive Committee		
Andrew Mackie Managing Partner	Anne Muraya East Africa Audit Leader	Bonga Nyembe Gauteng Audit Leader
Eric Tshabalala Transformation & Diversity Leader	George Tweedy Audit Risk Leader	Graham Berry Lead Client Service Partner
Hermine Smit National Professional Practice Director	James Welch Chief Operating Officer	Michael Daudu West Africa Audit Leader
Penny Binnie Audit Capture & Defend Leader	Stephen Munro Financial Services Industries Leader	Thega Marriday Chief Financial Officer



Ethics and independence

Stronger stance on noncompliance with firm policies and processes.

Strengthened independence processes.

Enhanced disciplinary liability framework.

Our culture is an essential part of our business in engendering and preserving trust and we undertake a number of activities to continuously develop our culture. We remain committed to maintaining a work environment that promotes ongoing, and open communication about ethics, compliance, corruption or other related matters and to provide an understanding of how to identify and report potential violations.

Deloitte People make a commitment to live the **Deloitte Africa Code**, which emphasises that ethics, quality and integrity are fundamental and not negotiable and that a responsibility rests on each of our people to report inadvertent breaches or other violations through our **Deloitte Speak Up** platform. We have implemented a non-retaliation policy.

We take a zero-tolerance stance on bribery and corruption and prohibit all forms of bribery and corruption in compliance with local and global anti-corruption laws and regulations.

We are in the process of further embedding ethics and integrity into the learning curriculum for the entire partnership body, **Leading with Integrity**. The focused ethical leadership training has been invested in to ensure that our partners embrace the requirement to be a voice for ethical leadership, role-modelling ethical leadership behaviours and fostering teams with high integrity.

We received an 'A' rating from Deloitte Global Ethics for our Ethics and Integrity implementation.



We manage our practice so that financial and operational considerations do not override fidelity to professional standards and serving public interest.

Deloitte Global Independence supports independence awareness across the Deloitte network through active engagement with independence and business leadership groups, periodic communications and alerts, and development of guidance, learning and instructions.

Our **independence policies and processes** are summarised as follows:

Deloitte Global develops independence policies, processes and enablers, based upon the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code) and the independence standards of the US Securities and Exchange Commission and the Public Company Accounting Oversight Board. Independence leadership messages, reinforces the importance of compliance with independence and related quality control standards, thereby setting the appropriate tone at the top and instilling its importance into our professional values and culture. Annual and engagement level independence declarations. Rotation of key audit partners and staff, at a minimum in accordance with the IESBA Code or more restrictive local laws and regulations where applicable. People Training on ethics, independence and conflicts of interest. Global Independence Monitoring System. Business Relationship Management System. Firm rotation from clients per regulatory requirements. Deloitte Conflict Checking System. Client Deloitte Entity Search and Compliance system. Business Relationship Management System. Portfolio risk reviews. Annual system of quality control review. Monitoring Global independence review, every three years. Partner and director independence testing, every three years. Audit quality dashboard, reporting and monitoring on breaches. Enhanced Africa disciplinary liability framework. **Sanctions** Disciplinary processes.



Risk management

Driving relevance, urgency and appropriate conflict management.

Changing behaviours to an intelligent and pro-active response to the risks facing our business.

To respond to the enhanced risk we face as a business and to drive the appropriate change in behaviours, we have invested heavily in our risk management processes. We emphasise the importance of effective risk management strategies through driving relevance, urgency and appropriate conflict management in resolving risk matters. We recognise that maintaining professional skepticism obliges us to maintain a never ending and uncompromising mind set.

We have developed a risk intelligence process that comprises **risk sensing**, the **dragon's den** and **client review board** in addition to our existing portfolio risk review process. Through these processes we pro-actively and continuously identify significant risk exposures emanating from our clients to the audit business, allowing us to design and implement safeguards to mitigate the risk exposure. These processes are further expanded on in the "A peek into the Deloitte Audit" section.

Clients exposing our business to an elevated risk of brand and reputation damage are enrolled into **iCARE** if the risk exposure is considered high and **CARE** where the risk exposure is considered medium. Both iCARE and CARE programmes are staffed by specialised members of the Audit Risk Management team who guide the engagement team and provide an additional level of competence and objectivity in planning, performing and concluding on the engagements.



Deloitte people

Right skillset at the right time.

Focus on changed behaviours to ensure that our auditors maintain professional skepticism.

Enhanced talent model which includes learning, rewards and recognition, centres of excellence, and delivery centres.

Our transformed approach to audit delivery is enabling our professionals to use more advances analytics, apply the latest tools, technologies and more critical thinking, thus spending more time applying professional judgement and gaining a deeper understanding of a client's business and industry and ultimately contributing to enhanced audit quality and an improved experience for our people.

Performing a high-quality Deloitte audit requires deep technical knowledge combined with relevant auditing skills and a skeptical mind-set. Substantial investments have been made in our talent and learning strategies and we have transformed our technical audit curriculum to build proficiency required by level.

At the core, a global mandatory Audit technical learning curriculum has been developed, targeting learners y-level, using a dynamic blend of live instructor-led, digital on-demand courses and on-the-job activities

Our professional development program has been established to help partners and other professionals maintain and enhance their professional competence and ensure consistency of audit execution. To supplement on-the-job development, we provide formal continuing professional development programs in relevant subject areas consistent with the Deloitte Global Audit Curriculum. Our audit partners and professional staff are required to complete at least 20 hours of continuing professional education annually and at least 120 hours every three years.

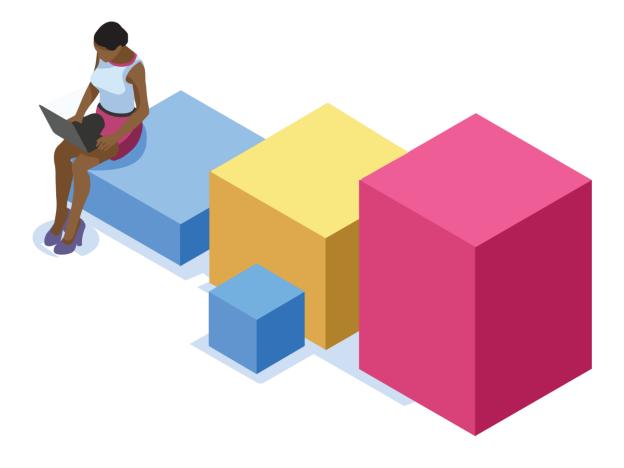
We have driven a change in behaviour to ensure that our auditors maintain professional skepticism through specifically tailored learning initiatives aimed at improving our partner and manager ability to deal with fraud. We have been driving an increased awareness in "what to look out for" and what focused audit procedures are required when responding to the risk of fraud.

When the engagement team utilises an **expert**, the engagement team evaluates whether the expert has the necessary competence, capabilities, and objectivity. We involve **specialists** throughout the audit engagement, including taxation, information technology, valuation, forensic and actuarial experts (among others) who receive relevant training as they are part of the extended audit teams and work directly within our audit systems processes, where required.

Senior engagement team member workload has been noted as a causal factor with symptoms presenting in a broad expanse of audit quality issues. We will be placing significant focus on this area with priority actions focused on the development of processes that allow for pro-active and holistic monitoring of workload and capacity, including the portfolio review process and an increased level of monitoring will be enforced on newly accepted clients. Solutions to assist our senior engagement team members in project management and attaining improved work-life balance continue to evolve.

Partner remuneration

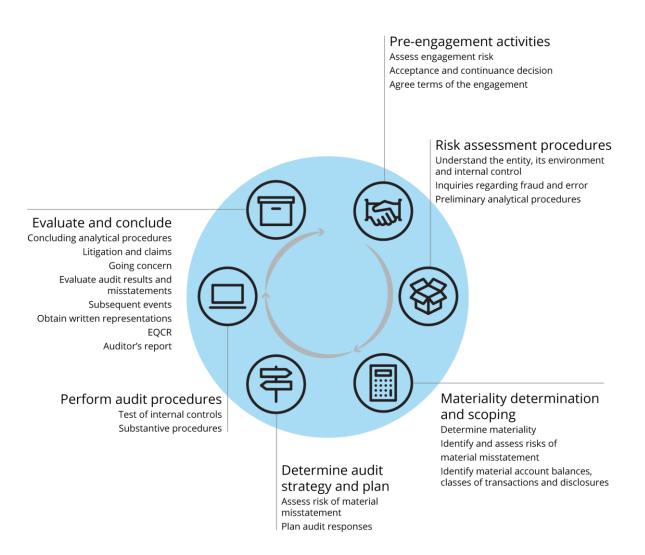
Audit quality is recognised through reward and recognition programmes and is built into performance standards at every level, against which professionals' overall evaluations are measured. In accordance with global policies, our partners are evaluated on an annual basis. Specifically partner evaluations which take the following factors into account: internal practice review, external inspection results and compliance with mandated requirements.





A peek inside the Deloitte Audit

Our audit approach includes requirements and guidance to assist in planning, performing, reporting and concluding audit engagements. These are based on the International Standards on Auditing and other applicable auditing standard frameworks for dual listed entities. The firm has supplemented these requirements and guidance to reflect local requirements, as applicable. We continuously enhance our audit methodologies to encourage a robust, fact-based risk assessment and adjustment of audit response in relation to changes in that risk assessment.





A peek inside the Deloitte Audit



Pre-engagement activities

We have deployed our client acceptance, continuance and opportunity management software solution, **Phoenix**, across the Africa member firm to embed and drive a consistent approach. Our **Know-Your-Client** process assesses whether information exists that makes association with a particular client questionable or undesirable, with specific consideration being given to whether entities and individuals have been implicated in corruption or are politically exposed persons.

Risk sensing has been designed to identify risks that appear to be "hidden in plain sight". Our risk sensing team pro-actively senses the risks through consideration of external data available in the public domain. The integrated risk intelligence model underpinning the process identifies risk insights for selected clients and articulates the risk exposure to the firm on a level that is independent of the audit business' audit activities to develop an historic client risk profile for future predictive risk intelligence. At 31 May 2019, 46 clients had been enrolled across our Africa member firm with prevalent themes identified being the presence of politically exposed persons on our clients' boards of directors, allegations of insider trading against members of senior management, aggressive chief executive officers, aggressive board of director remuneration strategies, independence concerns regarding audit committees, instances of non-compliance and restatements

The **Dragon's den** is initiated on clients with escalated risk. The process provides an opportunity for us to understand what drives the company's value and therefore critically evaluate areas that may be prone to management bias. We are able to assess the client through the lens of a stakeholder to provide a further independent and holistic view of the health and risk of the client. Dragon's den is intended to challenge our approach, change our behaviour and ensure that we embed specialist capabilities and tools and tailor the scope of our work to respond to identified risk indicators.

The **Client review board** has been mandated as a robust consideration and consultation process for all listed entities, banks and insurers in order to drive deliberate changed behaviours in our client acceptance and continuance processes. Through the process we assess the client risk by asking pertinent questions and considering identified risk flags; the professional services risk by assessing the appropriateness of our capacity, capabilities and specialists to execute the audit as well as our pricing model based on the client risk profile.

Where further heightened risk is identified a **Global audit** acceptance consultation is mandatory. Where the risk cannot be appropriately mitigated against, or threats to independence safeguarded, the board declines or terminates the engagement. For the year ended 31 May 2019, 208 client engagements have been assessed through the client review board process. Prevalent themes identified through the client review board include the presence of politically exposed persons on our clients boards of directors, adverse media related to the client, the client's association with implicated entities or individuals, the client having links to government, matters related to weak management integrity and poor governance, entities facing issues related to viability and being highly leveraged, cross-border listings and entities with restatements.

A combination of risk sensing and client review boards have resulted in approximately 208 clients being reviewed across the continent with 18 engagements terminated or proposals not accepted for the year ended 31 May 2019.



A peek inside the Deloitte Audit



Risk assessment procedures

Through a thoughtful and fact-based risk assessment process, the guided risk assessment (GRA) process has been rolled out on our audit software to enable users to identify and assess the risk of material misstatement and identify controls and substantive procedures in alignment with the Deloitte Way. The GRA acknowledges that lower risks should have a standard response and higher risks a more tailored customised response. Based on the GRA, preliminary analytical procedures are performed to support the risk assessment.

In response to the outcome of the GRA, prescriptive generalised control descriptions are provided to respond to the risk of material misstatement.



A peek inside the Deloitte Audit



A major change in our audit strategy and planning in the past year has been our approach to **ISA 600 Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors)**. We have a strong preference to perform the audits of all significant subsidiaries and components as Deloitte, ensuring a minimum level of coverage of the component audits within the group and all significant components from a materiality and risk perspective.

We have made a strategic investment in **Risk operations**, a proactive upfront challenge of the risk assessment, resulting in a responsive audit where time is focused on the real areas of risk. The key objectives are to drive change and the right behaviour upfront, improve the confidence of practitioners and ensure that our files are of a good quality standard through reviews of the audit risk assessment; risk of material misstatement identified; risk classification, and appropriateness of the planned audit response. The team is led by one of our most senior and experienced partners and has at 31 May 2019 reviewed more than 40 files across our Africa member firm.



A peek inside the Deloitte Audit



Audit procedures

The roll out of GRA and **Deloitte Way Workflows** (DWW) is designed to address the most common scenarios on audit engagements, which are applicable to entities in all industries. The DWW provides a standardised process for executing audit procedures on an account balances, financial statement cycle or a non-account process.

We have **increased our focus on fraud** in response to stakeholder expectations by increasing the involvement from forensic, money laundering and legal specialists when red flags derived from our lessons learnt are identified. A process has been developed to assess all **special purpose vehicles and unconsolidated structures** to determine whether they have been treated correctly for the Group. Our related parties procedures have been extensively enhanced to include improved identification thereof and assess the commercial substance and relevance of relationships.

Our established consultation network assists in resolving issues identified by the engagement team that requires additional information, perspectives or specialised knowledge.



A peek inside the Deloitte Audit



An Engagement quality control review (EQCR) is performed for all public interest entities, by an engagement partner who has the appropriate experience and knowledge about applicable accounting and auditing standards and regulations, as well as experience and knowledge of the entity's industry, economic environment, and accounting principles. We have in the past year placed significant focus on capacitating and recognising the role of the EQCR and enhanced the eligibility and training requirements.

In our role of raising the overall quality of financial statements, our audit reports are required to convey our opinion on the truth and fairness of financial statements and as such are required to be of high quality and insightful transparency. **Key Audit Matters** are reported for listed entities to enhance the communicative value of the auditor's report by detailing information on the matters that, in auditor's professional judgment, were of most significance in the audit of the financial statements.

Our **communications with audit committees** and our client's boards of directors provide valuable commentary on the more qualitative aspects of financial reporting and management of clients' businesses.

We consider our obligations in respect of NOCLAR (non-compliance with laws and regulations), which deals with matters such as fraud, corruption and bribery, money laundering, tax payments, financial products and services, environmental protection and public health and safety.



Monitoring

Embedding the Audit Quality Monitoring and Measurement (AQMM) programme. Our **AQMM programme** drives credible, reliable, and real-time audit quality monitoring activities that have contributed to our quality improvement goals. We are focused on identifying audit issues early, understanding what caused the issues, identifying key themes, and determining the actions needed to resolve the audit deficiencies. The early recognition of thematic or pervasive issues continues to be a critical focus to drive member firm level remediation.

Engagement monitoring is approached with a two-pronged strategy, a pro-active **in-flight monitoring (IFM)** process and retrospective **internal review process**.

The IFM process drives faster interventions to potential audit quality deficiencies on audit engagements while they are in process, through identification, timely solutions and real time actions. **Diagnostics monitoring**, specifically focused on public interest engagements, extracts key metrics on audit files to identify inconsistencies, potential documentation weaknesses, audit quality milestone non-compliance and issues with file configuration set-up. Through **Health Checks** and audit quality milestones, methodology enhancements and the most pervasive findings from the prior year's internal review are monitored. Where a partner has a prior year internal or external inspection remediation plan, an engagement file for that partner will be selected and will be subjected to In-flight Review in the current year.

Our **internal review process** has been augmented to ensure that up to 90 reviews can be accommodated across Deloitte Africa. The process accommodates public interest entities and other large non-public entities which are selected on a risk basis. The selected engagement files are reviewed to determine whether quality control procedures have been appropriately applied, assess the adequacy of the implementation of the audit approach, including compliance with our policies and procedures, monitor compliance with applicable local laws and assess the overall quality of service provided to clients. Consistency in findings and engagement ratings is driven by a mandatory moderation panel.

A risk-based approach is adopted to determine whether the **systems of quality control** processes and underlying Deloitte Policies Manual have been effectively designed, implemented and are operating effectively.

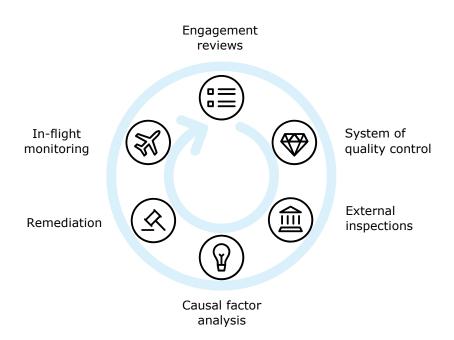
Focusing on **continuous improvement** is essential to driving improvements in audit quality. Understanding why findings occur in both internal and external inspections and the development of the appropriate actions to address the causes is fundamental. The key components of **causal factor analysis and remediation** include the creation of a culture where the causes of deficiencies are thoroughly and consistently explored. This results in the revision of the audit quality plan so that it provides for effective identification, implementation and monitoring of key audit quality priorities. The results from the internal review and quality control monitoring are included in our audit quality plan which is presented to our Audit Quality Board and Audit Leadership.

External inspections

We are subject to external inspections, which independently evaluate our quality and assist in enhancing our overall system of quality control. Following our 2010 review by the Institute of Certified Public Accountants of Kenya (ICPAK) inspection, our system of quality control processes were satisfactory.

Statement on the effectiveness of the functioning of the internal quality control system

We confirm that we are satisfied that our internal quality controls and systems are robust, operate effectively, and allow us to readily identify any areas of potential enhancement. We continually seek to refine all aspects of our business and we use the findings of the practice review, other internal reviews and external regulatory reviews to enhance our system of quality control.



Appendices

Appendix A EU EEA audit firms

Disclosure in accordance with Article 13.2 (b)(ii)-(iv) of the EU Audit Regulation¹

EU/EEA Member State (Article 13.2 (b)(iii) EU Audit Regulation: the countries in which each audit firm that is a member of the network is qualified as a statutory auditor or has its registered office, central administration or principal place of business)

Name of audit firms carrying out statutory audits in each Member State (Article 13.2 (b)(ii) EU Audit Regulation: the name of each audit firm that is a member of the network) EU Regulation 537/2014 on specific requirements regarding statutory audit of public-interest entities

EU/EEA Member State ²	Name of audit firms carrying out statutory audits in each Member State ³
Austria	Deloitte Audit Wirtschaftsprüfungs GmbH
	Deloitte Burgenland Wirtschaftsprüfungs GmbH
	Deloitte Niederösterreich Wirtschaftsprüfungs GmbH
	Deloitte Oberösterreich Wirtschaftsprüfungs GmbH
	Deloitte Salzburg Wirtschaftsprüfungs GmbH
	Deloitte Tirol Wirtschaftsprüfungs GmbH
	Deloitte Wirtschaftsprüfung Styria GmbH
Belgium	Deloitte Bedrijfsrevisoren / Réviseurs d'Entreprises CVBA / SCRL
Bulgaria	Deloitte Audit OOD
Croatia	Deloitte d.o.o. za usluge revizije
Cyprus	Deloitte Limited
Czech Republic	Deloitte Audit s.r.o.
Denmark	Deloitte Statsautoriseret Revisionspartnerselskab
Estonia	Deloitte Audit Eesti AS
Finland	Deloitte Oy

¹EU Regulation 537/2014 on specific requirements regarding statutory audit of public-interest entities ²EU transparency reporting requirement: the countries in which each audit firm that is a member of the network is qualified as a statutory auditor or has its registered office, central administration or principal place of business. ³EU transparency reporting requirement: the name of each audit firm that is a member of the network.

Appendix A EU EEA audit firms

Disclosure in accordance with Article 13.2 (b)(ii)-(iv) of the EU Audit Regulation

EU/EEA Member State ²	Name of audit firms carrying out statutory audits in each Member State ³
France	Deloitte & Associés
	Deloitte Marque & Gendrot
	Deloitte Marque Gendrot
	Audalian Commissaire
	BEAS
	Cisane
	Constantin Associés
	Constantin Entreprises
	Consultants Auditeurs Associés
	DB Consultants
	Durand & Associés
	ECA Audit
	Jacques Serra et Associés
	Laurens Michel Audit
	Opus 3.14 Audit Et Conseil
	Pierre-Henri Scacchi et Associés
	Revi Conseil
Germany	Deloitte GmbH Wirtschaftsprüfungsgesellschaft
	Deutsche Baurevision GmbH Wirtschaftsprüfungsgesellschaft
	SüdTreu Süddeutsche Treuhand GmbH Wirtschaftsprüfungsgesellschaft
Greece	Deloitte Certified Public Accountants SA
Hungary	Deloitte Könyvvizsgáló és Tanácsadó Kft.
Iceland	Deloitte ehf.
Ireland	Deloitte Ireland LLP - Republic of Ireland
Italy	Deloitte & Touche S.p.A.
Latvia	Deloitte Audits Latvia SIA
Liechenstein	Deloitte (Liechtenstein) AG
Lithuania	Deloitte Lietuva, UAB
Luxembourg	Deloitte Audit

Appendix A EU EEA audit firms

Disclosure in accordance with Article 13.2 (b)(ii)-(iv) of the EU Audit Regulation

EU/EEA Member State ²	Name of audit firms carrying out statutory audits in each Member State ³
Malta	Deloitte Audit Limited
Netherlands	Deloitte Accountants B.V.
Norway	Deloitte AS
Poland	Deloitte Audyt spółka z ograniczoną odpowiedzialnością spółka komandytowa
	Deloitte Audyt spółka z ograniczoną odpowiedzialnością
Portugal	Deloitte & Associados, SROC S.A.
Romania	Deloitte Audit S.R.L.
Slovakia	Deloitte Audit s.r.o.
Slovenia	Deloitte Revizija d.o.o.
Spain	Deloitte, S.L.
Sweden	Deloitte AB
United Kingdom	Deloitte LLP
	Deloitte Gibraltar Limited
	Deloitte NI Limited

Disclosure in accordance with Article 13.2 (b)(iv) of the EU Audit Regulation⁴

The total turnover achieved by the audit firms that are members of the network, resulting from the statutory audit of annual and consolidated financial statements: \in 2 billion⁵

⁴ EU transparency reporting requirement: the total turnover achieved by the audit firms that are members of the network, resulting from the statutory audit of annual and consolidated financial statements.

⁵ Amount represents an estimate determined based upon best efforts to collect this data. Certain Deloitte audit firms registered to perform statutory audits in respective Member States provide statutory audit services as well as other audit, assurance and non-audit services. While Deloitte endeavored to collect specific statutory audit turnover for each EU/EEA Deloitte audit firm, in certain cases turnover from other services has been included. The turnover amounts included herein are as of 31 May 2019, except for a limited number of instances where a Deloitte audit firm has different financial year-end or has not finalized its reporting for such period. In these cases, turnover amounts are for the relevant financial year or preceding financial year. Where currency other than Euros is used in the Member State, the amount in Euros was translated using an average exchange rate in effect for the period 1 June 2018 to 31 May 2019.

Appendix B Financial information

Disclosure in accordance with Article 13.2 (k)(i)-(iv) of the EU Audit Regulation

The breakdown of the Deloitte & Touche Kenya's turnover for the year ended 31 May 2019:

Turnover	USD
Statutory audit (PIEs or PIE subsidiaries)	3,584,285
Statutory audit (non-PIEs or non-PIE subsidiaries)	4,860,915
Non-audit services (audited PIEs or PIE subsidiaries)	17,281,855
Non-audit services (audited non-PIEs or non-PIE subsidiaries)	763,084
Non-audit services (other entities)	818,061
Total	27,308,201

Appendix C Public interest entities

Disclosure in accordance with Article 13.2 (f) of the EU Audit Regulation

Public Interest Entities Audited for Statutory Purposes at 31 May 2019.

African Banking Corporation Limited(rotated out in the current year) ARM Cement Plc(Under Administration) Bamburi Cement Limited Britam Life Assurance Company(Kenya) Limited (rotated out in the current year) Britam Holdings Plc (rotated out in the current year) Britam General Insurance Company(Kenya) limited(rotated out in the current year) Britam General Insurance Company(Kenya) limited(rotated out in the current year) Car & General (Kenya) Plc Faulu Microfinance Bank Limited Jamii Bora Bank Limited Mayfair Bank Limited Kakuzi Plc Kenolkobil Plc (rotated out in the current year) Kenya Airways Plc Kenya Airways Plc Kenya Women Microfinance Bank Limited Saham Assurance Company Kenya Limited SMEP Microfinance Bank Limited(rotated out in the current year) SMEP Microfinance Bank Limited(rotated out in the current year) Central Bank of Kenya(rotated out in the current year) 31 December 2018 Central Bank of Kenya(rotated out in the current year) 31 December 2018	Name	Client's financial year end
Bamburi Cement Limited Britam Life Assurance Company(Kenya) Limited (rotated out in the current year) Britam Holdings Plc (rotated out in the current year) Britam General Insurance Company(Kenya) limited(rotated out in the current year) Britam General Insurance Company(Kenya) limited(rotated out in the current year) Car & General (Kenya) Plc Faulu Microfinance Bank Limited Jamii Bora Bank Limited Mayfair Bank Limited Mayfair Bank Limited Kakuzi Plc Kenolkobil Plc (rotated out in the current year) Kenya Airways Plc Kenya Airways Plc Saham Assurance Company Kenya Limited Saham Assurance Company Kenya Limited SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018 SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018	African Banking Corporation Limited(rotated out in the current year)	31 December 2018
Britam Life Assurance Company(Kenya) Limited (rotated out in the current year) Britam Holdings Plc (rotated out in the current year) Britam General Insurance Company(Kenya) limited(rotated out in the current year) Car & General (Kenya) Plc Faulu Microfinance Bank Limited Jamii Bora Bank Limited Mayfair Bank Limited Kakuzi Plc Kenolkobil Plc (rotated out in the current year) Kenya Airways Plc Kenya Women Microfinance Bank Limited Saham Assurance Company Kenya Limited SMEP Microfinance Bank Limited(rotated out in the current year) SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018 SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018 SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018	ARM Cement Plc(Under Administration)	31 December 2018
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Car & General (Kenya) Plc Faulu Microfinance Bank Limited Jamii Bora Bank Limited Mayfair Bank Limited Kakuzi Plc Kenolkobil Plc (rotated out in the current year) Kenya Airways Plc Kenya Women Microfinance Bank Limited Saham Assurance Company Kenya Limited SMEP Microfinance Bank Limited(rotated out in the current year) SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018 SMEP Microfinance Bank Limited 31 December 2018 31 December 2018	Britam Holdings Plc (rotated out in the current year)	31 December 2018
Faulu Microfinance Bank Limited Jamii Bora Bank Limited Mayfair Bank Limited All December 2018 Kakuzi Plc Kenolkobil Plc (rotated out in the current year) Kenya Airways Plc Kenya Women Microfinance Bank Limited Saham Assurance Company Kenya Limited SMEP Microfinance Bank Limited(rotated out in the current year) SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018 SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018	Britam General Insurance Company(Kenya) limited(rotated out in the current year)	31 December 2018
Jamii Bora Bank Limited Mayfair Bank Limited Mayfair Bank Limited Saham Assurance Company Kenya Limited 31 December 2018	Car & General (Kenya) Plc	31 December 2018
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Kenya Airways Plc Kenya Women Microfinance Bank Limited Saham Assurance Company Kenya Limited SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018 31 December 2018 31 December 2018 31 December 2018	Kakuzi Plc	31 December 2018
Kenya Women Microfinance Bank Limited Saham Assurance Company Kenya Limited SMEP Microfinance Bank Limited(rotated out in the current year) 31 December 2018	Kenolkobil Plc (rotated out in the current year)	31 December 2018
Saham Assurance Company Kenya Limited SMEP Microfinance Bank Limited (rotated out in the current year) 31 December 2018	Kenya Airways Plc	31 December 2018
SMEP Microfinance Bank Limited (rotated out in the current year) 31 December 2018	Kenya Women Microfinance Bank Limited	31 December 2018
year)	Saham Assurance Company Kenya Limited	31 December 2018
Central Bank of Kenya(rotated out in the current year) 31 December 2018		31 December 2018
I	Central Bank of Kenya(rotated out in the current year)	31 December 2018

Appendix C Public interest entities (continued)

Disclosure in accordance with Article 13.2 (f) of the EU Audit Regulation

Public Interest Entities Audited for Statutory Purposes at 31 May 2019:

Name	Client's financial year end
Fidelity Shield Insurance Company Limited	31 December 2018
AIG Kenya Insurance Company Limited	31 December 2018
Old Mutual Life Assurance Company Limited	31 December 2018
Paramount Bank Limited	31 December 2018
Resolution Insurance Limited	31 December 2018
The Company for Habitat and Housing in Africa (Shelter Afrique)	31 December 2018
Williamson Tea Kenya Plc	31 March 2019
Kapchorua Tea Kenya Plc	31 March 2019
WPP Scangroup Plc	31 December 2018

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