



2026 Audit
Transparency Report
Kenya
30 September 2026

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Preface

This report sets out the practices and processes that are currently employed by Deloitte & Touche LLP (Kenya) for the period 1 June 2025 to 31 May 2026. The report has been prepared in accordance with the requirements of the European Union's Regulation 537/2014 on specific requirements regarding statutory audit of public interest entities.

Throughout this report:

- The Deloitte Pan African Trust is referred to as 'Deloitte Africa'.
- Deloitte & Touche LLP (Kenya) is referred to as 'Deloitte Kenya' or 'the firm'
- The terms 'Deloitte, we, us, and our' refer to 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 page 5 or [About the network](#).



Leadership message



Deloitte Kenya is pleased to share the ninth edition of its Audit Transparency Report for the year ended 31 May 2026. This report reflects our unwavering commitment to audit quality, transparency, professional excellence, and continuous development.

It demonstrates how these principles shape the way we serve our clients, empower our people, strengthen public trust, and uphold our responsibility to act in the public interest. Through this publication, we aim to provide stakeholders with clear insight into our governance, quality management practices, and ongoing efforts to deliver high-quality audits that contribute to confidence in the capital markets and the broader business environment.

Trust is the foundation of strong capital markets and sustainable economic growth, and in an environment shaped by rapid change, evolving regulation, and increasing stakeholder expectations, the importance of high-quality assurance has never been greater. Quality remains our defining priority, embedded in our culture, strengthened through our quality management systems, and reflected in every engagement we undertake.

Our multidisciplinary model continues to be a significant strength. By bringing together deep industry knowledge, technical excellence, and specialised capabilities across risk, controls, sustainability, regulatory assurance, and emerging areas of reporting, we are well positioned to support clients as they navigate increasingly complex business environments. This integrated approach enables us to deliver insights and assurance that are relevant, forward-looking, and responsive to the evolving needs of stakeholders.

We continue to invest in our people, technology, and innovation to enhance audit quality and deliver deeper insights. While advances in data, analytics, and artificial intelligence are transforming assurance, professional judgement and ethical leadership remain at the heart of what we do. A key focus remains on building the right talent and combining our capabilities in a way that allows us to deliver integrated, end-to-end solutions.

As we look ahead, we see tremendous opportunity at the intersection of trust and technology. The future of assurance will be increasingly digital and data-driven, requiring new skills, new ways of working, and continued innovation. Our commitment is to lead this transformation responsibly, leveraging technology to enhance quality, deepen insights, and strengthen trust in the capital markets, while ensuring that people remain at the centre of every decision we make.

This report reflects our commitment to transparency, accountability, and continuous improvement. As we look ahead, we remain focused on strengthening trust, enhancing quality, and delivering meaningful impact for our clients, our profession, and society.

On behalf of Deloitte Kenya, I thank our clients, regulators, audit committees, and stakeholders for their continued trust and partnership.

Anne Muraya
Chief Executive Officer
 Deloitte East Africa

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Deloitte Network

Deloitte network

Deloitte Kenya: legal structure and ownership

Deloitte Kenya is connected to the Deloitte network through the Deloitte Pan African Trust, a member firm of Deloitte Touche Tohmatsu Limited (DTTL). Deloitte Africa holds practice rights to provide professional services using the “Deloitte” name which it extends to Deloitte entities within its territory comprising of Botswana, Ethiopia, Ghana, Kenya, Malawi, Namibia, Nigeria, South Africa, Tanzania, Uganda, and Zambia. Deloitte Africa currently does not have a physical presence in Lesotho, Rwanda, Burundi, and Eswatini but holds Deloitte territorial rights to those territories and can service clients in these jurisdictions, subject to certain prior approvals.

Deloitte Kenya is authorised to serve as an auditor for clients in Kenya and is regulated by the Institute of Certified Public Accountants of Kenya (ICPAK).

The firm practices as a limited liability partnership established in accordance with Kenyan law, with registration number PF/0004. The firm’s head office is located at Deloitte Place, Waiyaki Way, Muthangari, Nairobi, Kenya.

Network description

The Deloitte network

The Deloitte network (also known as the Deloitte organisation) includes a globally connected network of DTTL member firms and their respective related entities operating in more than 150 countries and territories around 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 private company limited by guarantee incorporated in England and Wales. DTTL serves a coordinating role for its member firms and their respective

related entities and establishes 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 services to clients and does not direct, manage, or control any member firm or any of their respective related entities.

“Deloitte” is the brand under which over 500,000 dedicated professionals and practitioners in independent member firms (or their respective related entities) throughout the world collaborate to provide leading professional services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our people deliver measurable and lasting results that help reinforce public trust in capital markets and enable clients to transform and thrive. These member firms are members of DTTL. DTTL, these member firms and each of their respective related entities form the Deloitte organisation.

Each DTTL member firm and/or its related entities provides services in particular geographic areas and is subject to the laws and professional regulations of the country or countries in which it operates. Each DTTL member firm is structured in accordance with national laws, regulations, customary practice, and other factors, and may secure the provision of professional services in its respective territories through related entities. Not every DTTL member firm or its related entities provides all services, and certain services may not be available to attest clients under the rules and regulations of public accounting. DTTL, and each DTTL member firm and each of its related entities, are legally separate and independent, cannot obligate or bind any other, and are liable only for their own acts and omissions, and not those of any other. The Deloitte organisation is a global network of independent firms and not a partnership or a single firm. DTTL does not provide services to clients. Please see www.deloitte.com/about.com to learn more.



Deloitte network

Deloitte Kenya: governance – leadership in action

Deloitte Kenya and other practicing firms within Deloitte Africa are governed by the Deloitte Africa Board, which is constituted in terms of the Africa Participation Agreement. The Board comprises independent non-executive directors, ex-officio directors, and a cross-representation of partners of the firm. The Board provides oversight on key matters including governance, strategy, alignment to the Global firm, transformation, risk management, and regulatory matters.

The Deloitte Africa Board is responsible for the governance and oversight of the Deloitte Africa Member firm, including the Audit & Assurance practice. Specific responsibilities include approving admission of partners and principals, approving the allocation of units and earnings to partners, and approving the financial aspects of business plans.

Anne Muraya is the Managing Partner of Deloitte & Touche LLP in Kenya and is responsible for the day-to-day management of the firm. Together, the Managing Partner and the leadership team bear responsibility for the development and implementation of the strategy, including related policies, plans and procedures. They oversee and monitor implementation, and account for the firm's performance by means of, among others, reporting and disclosure to stakeholders.

The Deloitte Kenya's strategy is developed in alignment with the overall strategic direction established for the Deloitte network. Deloitte Kenya leaders participate in Deloitte network groups that set and monitor quality standards, and from which a number of quality, risk, and regulatory initiatives emanate.

Deloitte East Africa Executive Committee

The East Africa Executive Committee plays a crucial role in strategic decision-making, focus on critical markets and industries and alignment with our overarching goals and objectives. The Committee is comprised of seasoned leaders representing business and functions disciplines.

East Africa Executive Committee | as at 31 May 2026



Anne Muraya
Chief Executive Officer



Gladys Makumi
Chief Operating Officer



James Mwendia
Growth Office Leader



Urvi Patel
Consulting
Services Leader



Freda Muchena-Mitambo
Audit &
Assurance Leader



Arifa Sheikh
Market Risk
Leader



Frederick Omondi
Tax & Legal
Leader

03

System of quality management (SQM)

System of quality management (SQM)

ISQM 1 introduces a risk-based approach to the SQM that requires firms to respond to quality objectives and risks to our ability to execute high-quality audits in the following areas:

-  The firm's risk assessment process
-  Governance and leadership
-  Relevant ethical requirements
-  Acceptance and continuance of client relationships and specific engagements
-  Engagement performance
-  Resources
-  Information and communication
-  The monitoring and remediation process

The effective implementation of ISQM 1 has been and remains a key element of Deloitte's global audit and assurance quality strategy.

As part of the implementation of ISQM 1, quality objectives, quality risks and responses were formalised and brought together in a globally consistent technology platform to facilitate the design and maintenance of the system, as well as the operation through tri-annual self-assessments by business process owners and reporting capabilities to support the required annual evaluation.

Deloitte Kenya continues to work with leaders across the firm, as well as the broader network, to further enhance our proactive approach to managing the quality of engagements performed—identifying and addressing risks to quality and driving continued advancements in quality management processes serves us well into the future as the environment within which we operate continues to evolve and become increasingly complex.

Consistent with Deloitte's culture of continuous improvement and innovation, the firm's efforts relating to ISQM 1 and our SQM provide us with the opportunity to continually challenge ourselves—examining those areas where we can further enhance and transform our SQM. Quality is always front and centre, and robust quality monitoring processes play an integral role in our ability to continually improve.

ISQM 1 requires an annual evaluation of the SQM. The firm performed its annual evaluation of its SQM as of 31 May 2026.

Conclusion on the effectiveness of the SQM

The firm is responsible for designing, implementing, and operating a SQM for audits or reviews of financial statements, or other assurance or related services engagements performed by the firm, that provides the firm with reasonable assurance that the objectives of the SQM are being achieved. The objectives are:

- The firm and its personnel fulfil their responsibilities in accordance with professional standards and applicable legal and regulatory requirements, and conduct engagements in accordance with such standards and requirements; and
- Engagement reports issued by the firm or engagement partners are appropriate in the circumstances.

The firm conducted its evaluation in accordance with ISQM 1.

The firm concluded that the SQM provides the firm with reasonable assurance that objectives of the SQM are being achieved as of 31 May 2026.

Reasonable assurance is obtained when the SQM reduces to an acceptably low level the risk that the objectives of the SQM are not achieved. Reasonable assurance is not an absolute level of assurance, because there are inherent limitations of a system of quality management.

Independence, objectivity, and professional scepticism

The execution of high-quality audit and assurance engagements requires independence, objectivity, and professional scepticism. This means a continuous and tangible focus on Deloitte's critical role in serving the public interest, including creating a culture of quality where doing the right thing is of paramount importance. Deloitte consistently reinforces the important role of auditors as independent evaluators who must maintain a mindset of professional scepticism throughout the conduct of our work. This approach is reflected in Deloitte policies, methods, procedures, and learning, and is reinforced through quality management and accountability measures.

Strengthening A&A quality through AI-enabled innovation

Deloitte Audit & Assurance (A&A) is advancing with purpose as we execute our digital transformation strategy. In a landscape defined by rapid technological development, the focus remains on delivering high-quality engagements while adapting how A&A work is performed. Responsible innovation is fundamental to this approach. We seek to capture technological opportunities while maintaining the centrality of professional judgement, integrity, and trust.

A key recent development is the introduction of an embedded network of intelligent agents within Deloitte Omnia, Deloitte's global cloud-based platform.

Audit & Assurance approach

Deloitte's approach to performing a high-quality engagement involves the use of audit and standards-based assurance methodologies, common across the Deloitte network, supplemented by tools for use by our practitioners to plan, perform, supervise, review, document, conclude, and communicate the results of each engagement. Deloitte's approach is underpinned by professional standards, as well as the requirements of applicable laws and regulations.

Deloitte's audit methodology is risk-based, focusing on the financial statement account balances, disclosures, and underlying assertions that have a reasonable possibility of being materially misstated. Our methodologies are also dynamic - it evolves continuously to keep pace with the changing demands of investors, companies, and other stakeholders. It recognises that advances in the availability and management of large data sets, in statistical science as well as Generative AI (GenAI) are relevant to continuing to enhance the quality of Deloitte engagements.

This advancement supports teams with enhanced, context-aware insights, and real-time workflow assistance. These capabilities enable our people to analyse information, identify potential risk factors, support compliance and regulatory assessments, and reinforce the consistency and quality of procedures. Throughout, the principle of "human in the loop" remains paramount.

These capabilities are designed to augment, not replace, professional judgement: A&A professionals and practitioners remain responsible for challenging and validating the outputs of technology, ensuring that technology serves as an enabler of quality rather than a replacement for critical thinking or professional scepticism.

These enhancements are complemented with practical and ethical guidance, drawing on recognised frameworks such as Trustworthy AI™. Our people have access to regular and targeted learning, including the Deloitte AI Academy™, that addresses both the value and limitations of AI-enabled technologies. This learning reinforces the importance of human oversight, and alongside updated practice aids and guidance from subject matter specialists, supports teams in navigating new challenges and adapting to evolving stakeholder requirements.

Deloitte A&A's training and talent model is designed to equip teams not only to use technology, but also to apply professional scepticism, challenge estimates, assess disclosures, understand automated assurance workflows, and investigate exceptions or anomalies identified through digital capabilities. The Deloitte Global A&A talent framework and delivery models have also been revised, so that teams are equipped to operate confidently in a digital environment—balancing human oversight with the power of artificial intelligence.



Security, integrity, and client data

Deloitte recognises that the security and confidentiality of client data are fundamental to maintaining stakeholder trust and delivering credible engagement outcomes. As processes increasingly rely on cloud-based platforms and digital solutions, we continue to make investments to protect data safety and privacy. Deloitte A&A applies a security-by-design approach across the technology lifecycle, including upfront risk and data assessments, secure engineering standards, controlled testing and release processes, and ongoing monitoring and remediation in production. These controls are designed to support the confidentiality and security of client data throughout the A&A technology lifecycle.

We adhere to applicable regulatory requirements and industry standards concerning data handling, encryption, and access management. Secure data flows minimise risk of error or unauthorised access. Real-time oversight within Omnia enables early identification and resolution of anomalies, supporting prompt responses to potential risks.

Direction, supervision, and review (DSR) principles are embedded within both our technology and methodologies, extending not only to AI-enabled solutions but to many facets of digital engagement execution. Updated practice aids and practitioner guidance reinforce this focus on DSR across engagements.

Deloitte A&A's approach to technology usage is built on responsible stewardship of information. Through secure platforms, robust processes, and ongoing professional vigilance we continue to uphold the integrity expected by the public, regulators, and capital markets.



Resources to support Deloitte practitioners in the execution of high-quality engagements

The resources applied by Deloitte practitioners in the performance of their work include the proprietary tools, guidance, materials, and practice aids used in conducting engagements, which are available to all our practitioners in the Research Portal, an extensive online library, and in our audit execution platforms (such as Deloitte Omnia and Deloitte Levvia). These resources drive greater standardisation and consistency across Deloitte firms. Deloitte regularly issues guidance to our practitioners and communicates developments that should be factored into audit risk assessments and responses in order to maintain and drive quality execution.

Consultation

Quality and risk management considerations are integral to Deloitte's audit and assurance business and to the performance of engagements. That is why Deloitte views consultation as an essential, collaborative process—one that involves robust challenge and helps determine the most appropriate answers to complex questions. Deloitte has identified circumstances where consultation outside of the engagement team is required in order to demonstrate an appropriate level of professional judgment and the exercise of professional scepticism. Deloitte consultation policies require that conclusions are documented, understood, and implemented. Foundational to the effectiveness of the consultation process is Deloitte's investment in consultation resources who have the appropriate skills and expertise.

“

In addition to formal consultations, whenever engagement partners and teams need additional information or perspectives, they are encouraged to seek assistance from the Audit & Assurance Quality & Risk, or others in the organisation with specialised knowledge.

External and internal quality monitoring

Monitoring of quality

A continued focus on quality is of paramount importance to the Deloitte brand. It is critical that a Deloitte engagement is consistently executed and of high-quality, wherever in the world it is performed.

The objective of monitoring and remediation processes are to provide relevant, reliable, and timely information about the design, implementation, and operation of the SQM to leadership in order to enable appropriate and timely actions to be taken to respond to identified deficiencies. This includes the identification of deficiencies and good practices in the SQM and the assessment of the effectiveness of remedial actions in driving improvements in audit quality.



SQM monitoring

SQM monitoring is an integral part of the firm's monitoring activities and considers relevant requirements in ISQM 1, as well as evaluating the design, implementation and operating effectiveness of responses that address the quality risks that have been identified for the firm.

Key components of SQM monitoring include:

- Risk-based approach to selecting business processes, quality risks and responses to monitor.
- Mandatory moderation panel to drive consistency in evaluating findings and deficiencies.
- Identifying appropriate resources (from within the firm as well as from other Deloitte geographies or Deloitte Global) with the right experience.



Inspections of completed engagements

Key components of inspections of completed engagements include:

- Risk-based engagement selection and consideration of all major industries served by Deloitte Kenya while considering all signing partners or partner equivalents on a cyclical basis.
- Mandatory moderation panel to drive consistency in findings and engagement ratings.
- Identifying appropriate resources (from within Deloitte Kenya as well as from other Deloitte geographies or Deloitte Global) with the right experience and industry knowledge.



External inspections

In addition to the firm's own monitoring of quality, we are subject to external monitoring by the Institute of Certified Public Accountants of Kenya (ICPAK) as part of its quality assurance and regulatory oversight framework. Such reviews include inspections of selected engagement files and an assessment of the firm's System of Quality Management (SQM) for compliance with applicable professional standards and regulatory requirements.

At the date of issuance of this report, ICPAK's review of selected engagements and the firm's System of Quality Management is ongoing. Accordingly, no final inspection report has been issued and the firm has not received any final findings or conclusions arising from the review.



Root cause analysis and remediation

Continuous improvement is essential to Deloitte's culture of quality and excellence. Understanding why engagement level findings and SQM deficiencies occur is critical to being able to design effective remedial actions. When engagement level findings or SQM deficiencies are identified, whether through internal or external monitoring activities, actions are taken to identify gaps and develop appropriate remediation activities. Remediation is imperative to drive continuous improvement in quality and avoid future similar findings. An audit quality plan is prepared by the firm and provides for effective implementation and monitoring of key audit quality priorities.

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Learning and development initiatives

Learning and development initiatives

At the core, Deloitte has a single, global mandatory audit technical learning curriculum, tailored for learners by level, using a dynamic blend of live instructor-led, digital on-demand courses, and on-the-job activities.

All client service practitioners are required to follow the firm's learning requirements for their roles and complete sufficient continuing professional education (CPE) each year to ensure both compliance with regulatory standards and Deloitte internal policies. This is achieved through structured, formal learning programmes, such as internal or external courses, seminars, or e-learning, and all of these programmes cover the full range of the Global Talent Standards (e.g., leadership & professional competencies, function-specific technical competencies, and competencies in areas of specialisation).

All client service practitioners have clearly defined role expectations and global Talent Standards which outline the capabilities that are required of practitioners at each level.

Deloitte has made substantial investments in talent and learning strategies and transformed the technical curriculum to build the refreshed skillsets and proficiency required by level.

Aligned to Deloitte Audit & Assurance's efforts to deliver a more skills-focused career experience, Deloitte prioritises providing modernised learning experiences that are skills-based, tailored, and relevant for practitioners and professionals in their specific roles.

Deloitte has also established specific learning offerings for specialists working on engagements to support their knowledge and understanding. In addition, client service practitioners working on Assurance engagements are provided with a range of learning offerings responsive to emerging business needs.

The objective of the Deloitte Kenya professional development programme is to help partners and practitioners maintain and enhance their professional competence and ensure consistency of execution. To supplement on-the-job development, Deloitte Kenya provides formal continuing professional development programmes in relevant subject areas consistent with the Deloitte Global Audit & Assurance Curriculum.

In addition, several professional development courses are available to all practitioners that are designed to develop key professional skills such as difficult conversations, negotiation, "art of empathy" and how to be a good coach.

In addition, each practitioner that is registered with the Institute of Certified Public Accountants of Kenya (ICPAK) is required to complete at least 120 CPD hours every three years to remain in good standing.



05

Remuneration

Remuneration

The execution of high-quality is expected from all practitioners and is embedded across the Deloitte network. This is recognised through reward and recognition programmes and is built into performance standards at every level, against which practitioners' overall evaluations are measured.

In accordance with global policies, Deloitte Kenya's partners are evaluated on an annual basis, and depending on the outcome of the evaluation, the remuneration of partners may increase or decrease. The evaluation includes consideration of quality based on regulatory and internal quality review outcomes; independence; and compliance with regulatory and internal policy requirements.

Selection, recruitment, retention and promotion

Investing in our people: Delivering quality through our talent

The quality of the Deloitte & Touche Partnership's audits is underpinned by the expertise and integrity of its people. As the profession continues to evolve, the firm remains committed to attracting, developing, and retaining talented professionals who uphold the highest standards of quality, ethics, and professional excellence. The firm's people strategy is built on creating opportunities for meaningful career growth through continuous learning, professional development, mentoring, and an inclusive environment. The firm invests in equipping its professionals with the technical, leadership, and digital capabilities required to deliver high-quality audits and respond to an increasingly complex business and regulatory environment.

The firm applies robust recruitment and selection processes to attract individuals whose skills, values, and behaviours align with the firm's purpose and commitment to quality. The firm supports the development and retention of its people through coaching, succession planning, and opportunities for growth across all stages of their careers.

Career progression and promotion decisions are based on demonstrated performance, technical proficiency, leadership capability, professional conduct, and contribution to audit quality. Through the firm's talent and succession planning processes, it seeks to build a sustainable pipeline for future leaders. The firm's performance and reward approach reinforces behaviours that support quality, professional scepticism, ethical conduct, and risk management.

By investing in its people, fostering continuous development, and recognising behaviours that support quality, the firm aims to deliver consistent, high-quality audits in the public interest.

Key Human Resources Principles



Attracting talent through objective recruitment and selection processes.



Developing capabilities through continuous learning, professional development, and technical training.



Retaining and engaging people through meaningful careers, mentoring and an inclusive culture.



Promoting on merit based on performance, leadership potential, and contribution to quality.



Rewarding quality-focused behaviours through performance and remuneration frameworks aligned to audit quality and professional standards.



Building future leaders through talent management and succession planning.

06

Independence

Independence

Deloitte Kenya Independence

Deloitte Kenya has designed and implemented and operates a system of quality management ("SQM") for the relevant independence requirements as it relates to audit or reviews of financial statements, and other assurance or related services engagements ("Independence SQM").

The Independence SQM comprises responses (policies and procedures) that address independence quality risks to the achievement of the independence objectives. The responses are based on expectations set out in Deloitte Global Independence policies, and are supplemented, as appropriate, to reflect additional national or regional requirements that may be more restrictive than Deloitte Global policies.

Deloitte Kenya leadership reinforces the importance of compliance with independence and related quality management standards, thereby setting the appropriate tone at the top and instilling its importance into the professional values and culture of Deloitte Kenya. Strategies and procedures to communicate the importance of independence to partners, other practitioners, and support staff have been adopted, emphasising each individual's responsibility to understand and meet the independence requirements.

The Independence Leader is responsible for overseeing independence matters within Deloitte Kenya, including the design, implementation and operation of the Independence SQM.

The firm's Independence SQM comprises responses to the following key independence areas:

- Client, engagement, and business relationships, including use of the independence business process tools: the Deloitte Entity Search and Compliance (DESC) system and the Service Request Monitoring (SRM) application
- Firm and personal financial relationships, including the use of the Global Independence Monitoring System (GIMS)
- Employment and other relationships
- Independence confirmations
- Independence consultations
- Independence-related policies and communications
- Independence learning
- Breaches of independence requirements
- Disciplinary measures for failures to adhere to applicable independence requirements

The firm's Independence SQM also includes detective monitoring responses over some of the key independence areas to ensure independence compliance.

All responses (including the detective monitoring responses) in the Independence SQM are tri-annually self-assessed and subject to SQM monitoring for design, implementation and operating effectiveness on a risk-based approach.

Independence was reviewed as a business process as part of the firm's latest SQM evaluation. Please refer to page 8 for the firm's conclusion on the effectiveness of the SQM.



DESC

Deloitte Entity Search and Compliance

Global, searchable database containing specific entity information relevant in determining personal and professional independence restrictions



SRM

Service Request Monitoring

Application integrated with DESC that provides a standard business process workflow for submitting and reviewing preapproval requests to provide services to and enter into business relationships with clients



GIMS

Global Independence Monitoring System

Application that contains financial relationship data with relevant independence compliance indicators

Long association requirements of audit partners and practitioners

When individuals are involved in audit engagements over extended periods of time, familiarity, and self-interest threats may arise. In order to address these threats, Deloitte Africa has implemented a policy on long association of partners and professional staff on audit engagements. The policy is based on local regulatory requirements, read with the International Code of Ethics for Professional Accountants (IESBA Code).

The Central Bank of Kenya mandates a five-year rotation policy for key team members involved in the audit of banks and microfinance banks. The lead audit partner, or the audit partner responsible for reviewing the audit and the audit manager, should not perform audit services for an institution for more than five consecutive financial years. They may resume the role only after a lapse of three years from the last audit engagement with the institution.

The Insurance Regulatory Authority (IRA) also mandates rotation of team members involved in the audit of insurance and reinsurance companies. Audit partners and managers are not permitted to perform audit services for an insurer for more than three consecutive financial years. Audit staff other than the audit manager are permitted to support the audit manager and the audit partner on the audit of a specific insurer for a period of not more than three consecutive years. Thereafter at least 50% of the audit staff working on an audit of a specific insurer shall be required to be replaced.



Ethics

Upholding professional standards and ethics

Deloitte Kenya actively participates in the regulatory developments impacting the accountancy profession through public consultation processes. We work with governments and regulators on new legislation and regulation considerations. Our collaboration with professional bodies contributes to ensuring continuous improvement in audit quality and upholding the integrity of the profession in the public interest.

Integrity is foundational to everything we do. Our reputation is one of our most valued assets, enabling us to attract and retain world-class talent and earn the trust of clients, regulators, and society.

Our ethics programme is led by a dedicated Ethics Officer and is designed to build trust in our profession and among our professionals. It is premised on our [Global Principles of Business Conduct](#) | [Deloitte Global](#), our [Code of Conduct](#), and a set of ethics policies.

These standards set clear expectations for behaviour and accountability. The programme is underscored by a clear tone at the top from leadership, and supported by mandatory learning, regular workshops, online training, a dedicated whistleblowing line, and open dialogue on how ethical issues are addressed. These initiatives aim to ensure all our people are empowered to make responsible and informed choices.

Our ethics programme and standards reaffirm our Purpose – to make an impact that matters – across all dimensions: environmental, social, governance, and financial.

[Our Purpose & Values](#) | [Deloitte](#)

07

Appendices

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 (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/EEA member state	Name of audit firms carrying out statutory audits in each member state
Austria	Deloitte Audit Wirtschaftsprüfungs GmbH
	Deloitte Niederösterreich Wirtschaftsprüfungs GmbH
	Deloitte Oberösterreich Wirtschaftsprüfungs GmbH
	Deloitte Salzburg Wirtschaftsprüfungs GmbH
	Deloitte Tirol Wirtschaftsprüfungs GmbH
	Deloitte Wirtschaftsprüfung Steuerberatung DWS1 Steiermark GmbH
Belgium	Deloitte Bedrijfsrevisoren/Réviseurs d'Entreprises BV/SRL
Bulgaria	Deloitte Audit OOD
Croatia	Deloitte d.o.o. za usluge revizije
Cyprus	Deloitte Limited
Czech Republic	Deloitte Audit s.r.o.
	Deloitte Assurance s.r.o.
Denmark	Deloitte Statsautoriseret Revisionspartnerselskab
Finland	Deloitte Oy
France	Deloitte & Associés
	Deloitte Audit Holding
	BEAS
	Constantin Associés
	Pierre-Henri Scacchi et Associés
	Revi Conseil

Appendix A | EU EEA audit firms

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

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: : €2.4 billion³

³Amount 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 2026, except for a limited number of instances where a Deloitte audit firm has different financial year-end or has not finalised its reporting for such period. In these cases, turnover amounts are for the relevant financial year or preceding financial year. Where currency other than the Euro is used in the member state, the amount in Euros was translated using an average exchange rate in effect for the period 1 June 2025 to 31 May 2026.

EU/EEA member state	Name of audit firms carrying out statutory audits in each member state
Germany	Deloitte GmbH Wirtschaftsprüfungsgesellschaft
	Deutsche Baurevision GmbH Wirtschaftsprüfungsgesellschaft
	SüdTreu Süddeutsche Treuhand GmbH Wirtschaftsprüfungsgesellschaft
Greece	Deloitte Certified Public Accountants S.A.
Hungary	Deloitte Könyvvizsgáló és Tanácsadó Kft.
Iceland	Deloitte ehf.
Ireland	Deloitte Ireland LLP
Italy	Deloitte & Touche S.p.A.
Latvia	Deloitte Audits Latvia SIA
Liechtenstein	Deloitte (Liechtenstein) AG
Lithuania	UAB Deloitte Lietuva
Luxembourg	Deloitte Audit
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
	Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością spółka komandytowa
	Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością
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Appendix B | Financial information

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

The breakdown of the Deloitte Kenya 2026 turnover:

Turnover	KSH'M
Statutory audit (PIEs or PIE subsidiaries)	189
Statutory audit (non-PIEs or non-PIE subsidiaries)	1,083
Non-audit services (audited PIEs or PIE subsidiaries)	94
Non-audit services (audited non-PIEs or non-PIE subsidiaries)	1,741
Non-audit services (other entities)	4,094
Total	7,201

EU transparency reporting requirement: information about the total turnover of the audit firm, divided into the following categories:

- 2(k)(i). Revenues from the statutory audit of annual and consolidated financial statements of public-interest entities and entities belonging to a group of undertakings whose parent undertaking is a public-interest entity;
- 2(k)(ii). Revenues from the statutory audit of annual and consolidated financial statements of other entities;
- 2(k)(iii). Revenues from permitted non-audit services to entities that are audited by the audit firm; and
- 2(k)(iv). Revenues from non-audit services to other entities.

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 by Deloitte Kenya in the financial year 2026:

Name	FYE
APA Life Assurance Limited	31-December
APA Insurance Limited	31-December
Car & General (Kenya) Plc	31-December
Egaads Limited	31-March
Eastern and Southern African Trade and Development Bank	31-December
Ghana Reinsurance Company Limited	31-December
Invest and Grow (IG) Savings and Credit Co-operative Society Limited	31-December
Kakuzi Plc	31-December
Kenya Electricity Generating Company Plc (KenGen)	30-June
Kenya Reinsurance Corporation Limited	31-December
Kingdom Bank Limited	31-December
Mayfair Insurance Company Limited	31-December
MUA Insurance (Kenya) Limited	31-December
NCBA Bank Kenya Plc	31-December
NCBA Group Plc	31-December
Oak SPV AssetCo Limited	31-December
Paramount Bank Limited	31-December
Stanbic Bank Kenya Limited	31-December
Stanbic Holdings Plc	31-December
ZEP-RE (PTA Reinsurance Company)	31-December

EU transparency reporting requirement: list of public interest entities for which the audit firm carried out statutory audits during the preceding financial year.



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