

2024 **Annual** **Report**

**ENTERPRISE TIER 3 PROVIDENT FUND
SCHEME (ET3PFS) 2024 ANNUAL REPORT**

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>> **Notice of Annual General Meeting**

The Virtual Annual General Meeting (AGM) of the **Enterprise Tier 3 Provident Fund Scheme (ET3PFS)** will be held on Thursday, 28th August 2025 from 11:00am to 1:00pm to consider the following:

Agenda

1. Welcome and Introduction of Board of Trustees
2. Scheme Board Chairman's Statement
3. Report on Scheme Performance Update – 2024 Fact Sheet
4. Receipt of the Scheme Financial Statements together with the Reports of the Trustees and the Auditor thereon for the year ended December 31, 2024.
5. Q&A Session
6. Closing Remarks

Dated this 8th Day of August 2025

By Order of the Board Of Trustees

Theresa Aggrey (Ms.)
Secretary to the Scheme Board

>> **Particulars of Service Providers/Advisors**

Chairman of Board of Trustees	Fiifi Kwakye Plot 4 Okpoi Gonno Spintex Road Accra
Administrator	Enterprise Trustees LTD Advantage Place, Mayor Road, Ridge West. PMB, GPO Accra
Fund Managers	Databank Asset Management Services LTD 61 Barnes Road Adabraka Accra Tesah Capital LTD Allied Heights (2nd Floor) 10 Olusegun Obasanjo Way Abelenkpe Accra
Independent Auditor	PricewaterhouseCoopers Chartered Accountants PwC Tower A4 Rangoon Lane Cantonment City PMB CT 42, Cantonments Accra
Custodian	Stanbic Bank Ghana LTD Stanbic Heights Plot 215 South Liberation Link Airport City Accra



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>> Board Chairman's Statement



Chairman

Mr. Fiifi Kwakye

Board Chairman's statement to
Members of the Enterprise Tier 3
Provident Fund Scheme (ET3PFS)

Board Chairman's statement to Members of the Enterprise Tier 3 Provident Fund Scheme (ET3PFS)

Dear Valued Scheme Members

It is my pleasure to welcome you all to the Annual General Meeting of the Enterprise Tier 3 Provident Fund Scheme. On behalf of the Scheme Board, I would like to express my appreciation for keeping faith with the scheme over the years.

I will begin with an overview of the economy within which the Fund operated in the year under review and proceed with a detailed account of the performance of the Scheme in 2024. I will conclude with our expectations for the year ahead.

Economic Overview – The Ghanaian economy in 2024

Ghana's economy made a strong recovery in 2024, following a difficult period in the previous year. This turnaround was supported by improved performance in key sectors, better inflation control, and continued implementation of reforms under the International Monetary Fund (IMF) programme. Economic activity gained momentum across the country, setting a more positive tone for growth and development.

The economy grew significantly, with a GDP of 5.7% in 2024, as compared to 3.1% in 2023. The growth was led by strong performances in mining, construction, and manufacturing, while agriculture and services such as ICT, transport, and trade also made notable contributions. Government interventions to boost local production and infrastructure development also played a key role in this growth.

The Ghanaian cedi saw improved performance against other major currencies in 2024. Specifically, the cedi depreciated by 19% against the US Dollar, a better outcome than the 28% fall in 2023. This was largely due to higher foreign reserves, tighter monetary policy, and foreign exchange market interventions by the Bank of Ghana. Although inflation remained high at 23.8% in December, it showed signs of easing, supported by the stable currency, improved food supply, and prudent public financial management.

>> Board Chairman's Statement

Economic Overview – The Ghanaian economy in 2024

With inflation beginning to moderate, the Bank of Ghana reduced its key interest rate, the Monetary Policy Rate (MPR), from 29.00% in December 2023 to 27.00% by the end of December 2024. This shift created a more supportive environment for borrowing and investment. The Ghana Stock Exchange also performed exceptionally well, with a 56% return for the year, up from 28% in 2023, reflecting improved investor confidence and stronger corporate earnings.

Overall, 2024 marked a year of recovery and renewed confidence in Ghana's economic direction, setting a solid foundation for continued stability and growth in the years ahead.

Outlook for the Ghanaian economy in 2025

Ghana's economy is expected to grow steadily in 2025, with a projected growth rate of 4.0% to 4.5%. This growth will be supported by strong performance in agriculture, oil and gas, and services like banking and telecoms. Government initiatives such as the 24-Hour Economy and major infrastructure projects are also helping to keep the momentum going. Inflation has gone down to 13.7% by mid-2025 and is expected to drop further by the end of the year. This has led to lower interest rates, making it easier and cheaper for people and businesses to borrow money locally. The Ghanaian Cedi has also become stronger and is expected to perform better against other currencies in 2025. Thanks to more foreign reserves, higher exports, and good progress in settling the country's external debts.

The Government's efforts to manage its finances are also paying off. In the first half of 2025, it recorded an improved primary surplus of 1.1% (against a target of 0.4%). Again, the Country's total debt as a percentage of GDP has dropped significantly from 61.8% as at December 2023 to 43.8% as at June 2025, due to their keen effort in managing borrowing rates. These improvements show that the Economy is on the right path. However, there are still challenges, including rising global prices, unexpected weather affecting crops, and other external shocks. Even so, the outlook remains positive as long as the government continues with its current plans and reforms under the support of the IMF.

Performance of the Scheme

The Scheme returned 23.67% for the year under review. Since inception, the Scheme has returned a Compounded Annual Growth Rate (CAGR) of 19.09%. The Scheme year on year continues to record remarkable investment returns. For the year 2024, the Scheme earned investment income of GHS 49.62 million on fixed income instruments and GHS16.16 million on Equities, Mutual Fund and Alternative investments.

>> **Board Chairman’s Statement**

Growth in Asset Under Management during the year 2024

The ET3PFS Scheme which incepted in 2012 with an Asset Under Management (AUM) of GHS1.80 million has grown to GHS1.49 billion as at year end. At the end of the year, the Scheme’s AUM which comprised contributions received and returns generated stood at GHS1.49 billion compared to the previous year’s position of GHS1.14 billion representing a growth of 31%. This growth is attributed to net contribution of 46% and returns of 54%.

The Scheme remained compliant with all assets for the period under review except for Government Securities which breached by 3.8% due to the DDEP reclassification of local bonds as part of Government securities

Membership of the Scheme

The membership of the Scheme grew by 5.38% over the previous year 2023. The total membership at the end of 2024 stood at 46,133 (2023: 43,778)

	2024	2023
Members at the beginning	43,778	37,683
Members enrolled	4,503	7,784
Members Exited	(2,148)	(1,689)
Total Membership as at December	46,133	43,778

Benefit Payout

The total benefit payout for 2024 was GHS201.72 million as compared to GHS363.25 million for 2023. The total retirement benefit paid was GHS26.20 million and the highest benefit paid in the year was GHS1.80 million.

>> Board Chairman's Statement

Member Education and Engagement Activities

Over the period, the Trustees have consistently engaged members through varied activities to ensure transparency and accountability of the Scheme. Some of these activities during 2024 are;

Tomorrow Today Webinar Series:

To promote awareness about the importance of retirement planning and sound financial management, Enterprise Trustees continued its "Tomorrow Today" webinar series, streamed live on YouTube, Facebook, and Zoom. The series remains a key platform for engaging members and the public on timely financial topics.

Young and Invested Podcast Series:

Enterprise Trustees introduced the "Young and Invested" podcast series to spark relatable and engaging financial conversations among the youth. The podcast focuses on helping young professionals navigate money matters and take charge of their financial futures.

New Joiners Webinar:

The Scheme held quarterly webinars for all new Members of the scheme to enlighten them about the National Pensions Act 2008 (Act 766), the operations of the Scheme and how they can be updated with the growth of their pension funds.

Scheme Annual General Meeting:

The Scheme held its maiden Annual General Meeting (AGM) on 8th August 2024 to engage members on the management and performance of the Scheme over the past year. The AGM served as a platform to present the audited financial statements, share updates on key activities, address member concerns, and reaffirm the Scheme's commitment to transparency, accountability, and long-term value creation for members.

Quarterly Advantage Report and Newsletter:

The Scheme circulated its quarterly Advantage Report and Newsletter to members, offering insights into the Scheme's performance, key financial updates and developments, as well as education on retirement planning and other long-term financial wellness topics relevant to their journey toward a secure future.

Key Regulatory Activities

The Regulator organized a series of stakeholder engagement sessions during the period under review. A key highlight was the go-live of the Risk-Based Supervision (RBS) portal, which is now being used for all regulatory reporting activities. This marked a significant step towards enhancing regulatory oversight and promoting transparency within the pensions industry. To ensure effective adoption, all industry players received training on the use of the new reporting model.

>> Scheme Governance

Quarterly Trustee Meetings

The Scheme Board and its sub-committees held quarterly meetings to review the affairs of the Schemes in accordance with section 38 of the National Pensions Act, 2008 (Act 766).

Changes to the Trustee Board

On 31st December 2024, the Board of Trustees bid farewell to Mr. John Fiam-Coblavie, the Independent Trustee of the Scheme, who retired after eight years of dedicated service. We are deeply grateful for his unwavering commitment and for being instrumental in the growth of the Scheme since its inception.

Following his retirement, Dr. Frank Gamadey was appointed as the new Independent Trustee of the Scheme. On behalf of the Board, I welcome him and look forward to the varied expertise he brings for the continued benefit and advancement of the Scheme.

Trustee Training

In accordance with Regulation 7 of Legislative Instrument (LI) 1990, Trustees periodically participate in learning and development programmes to maintain and enhance the skills and knowledge required to effectively manage the Scheme. These training sessions cover current regulatory and industry developments, as well as specific areas of Scheme activity where changes or adjustments have been implemented.

In line with the implementation of the Risk-Based Supervision (RBS) Model by the Regulator, the National Pensions College organized a three-day training programme on Risk Management in Pension Administration for all Trustees in September 2024. This training aimed to strengthen Trustees' capacity to identify, assess, and manage risks in line with evolving industry standards and regulatory expectations.

Outlook for 2025

The Board of Trustees remains committed to delivering a secure, transparent, and rewarding pension journey for all scheme members. We are implementing forward-looking strategies focused on strengthening our investment approach through diversification, enhancing risk management, and leveraging innovation to drive long-term growth. These strategic shifts are being translated into smarter, member-focused solutions designed to improve your overall pension experience.

Beyond investment performance, we are also intensifying efforts to enhance member engagement. Our ongoing KYC initiative remains a top priority, ensuring we maintain accurate and complete member records, a key step towards personalizing your retirement support.

>> Scheme Governance

Conclusion

In conclusion, I wish to once again express my profound gratitude to the Members of the Scheme for their continued support. I also extend my sincere appreciation to the Board, Management, and staff of Enterprise Trustees LTD for their relentless efforts in driving the growth of the Scheme.

To my fellow Scheme Board Members, both past and present, thank you for your invaluable guidance and sound counsel.

To all our partners, Fund Managers, Custodians, and Auditors, thank you for your tireless commitment and collaboration. We look forward to another year of progress and shared success.

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>> Report of the Trustees

The Trustees present their report together with the audited Financial Statements of the Scheme for the year ended 31st December 2024.

>> Establishment, Nature and the Status of the Scheme

The Scheme is a defined contribution scheme which provides lump sum benefits on retirement and such other ancillary benefits to members who meet the qualifying conditions stipulated under the National Pensions Act, 2008 (Act 766) as amended.

The Scheme is a tax-exempt pension fund under the National Pensions Act, 2008 (Act 766) and any amendments made to it thereafter. The Scheme's activities are bound by provisions of the National Pensions Act, 2008, (Act 766) as amended, Occupational and Personal Pension Schemes (General) Regulations, 2011 (L.I.1990), guidelines formulated and published and any Board directives that may be issued from time to time as well as the Governing Rules of the Scheme.

The Trustees of the Scheme are ultimately responsible for administration of the Scheme and their responsibility to the Scheme is established by a Trust Deed and Scheme Governing Rules approved on 1st November 2012.

Scheme Governing Rules and the Trust Deed both of which are subject to the National Pensions Act, 2008, (Act 766) as amended, form the basis of establishing the Scheme.

>> Trustees

The current Board of Trustees as well as any changes made during the year are indicated as below:

	Licence No	Position	Date of Appointment	Date of Exit
Mr. Fiifi Kwakye	NPRA15013	Chairman	1 st December 2011	
Mr. John Fiam-Coblavie	NPRA16008	Independent Trustee	15 th July 2016	31 st December 2024
Mr. Joseph Ampofo	NPRA15010	Member	16 th October 2014	
Mrs. Araba Asumanu	NPRA16115	Member	25 th July 2016	
Mr. Shehu Sanusi	NPRA15477	Member	11 th May 2023	
Dr. Peter Kwesi Terkper	NPRA24010	Member	19 th February 2024	
Mrs. Belinda Fokuo	NPRA24011	Member	19 th February 2024	
Dr. Frank Mawuyome Gamadey	NPRA15435	Independent Trustee	29 th October 2024	

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>> Fact Sheet

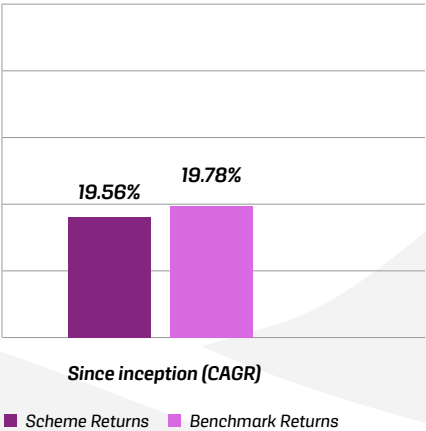
Objective

The objective of the Scheme is to provide retirement income security, by enhancing retirement benefit outside the mandatory schemes. The fund serves as a tax saver to members who contribute 16.5% of their basic salaries after mandatory contribution of 18.5%. It aims at optimizing returns on members' contribution. This is achieved by investing in a diversified portfolio of government securities, local government, money market, corporate bonds, alternative investments, equities and mutual funds.

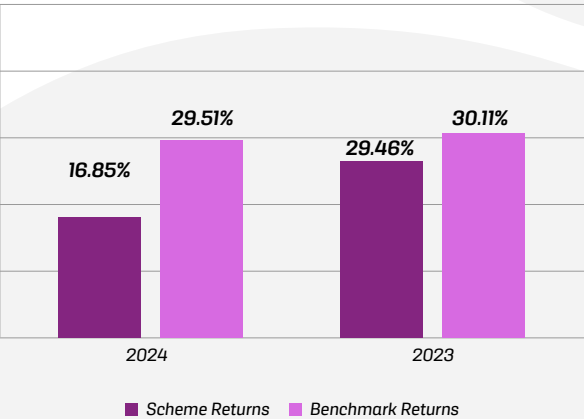
Scheme Details

Name of Scheme	Enterprise Tier 3 Provident Fund Scheme
Inception Date & Price	Nov, 2012 50.00
Currency	Cedi
Fund size	GHS 1.49 billion
Unit Price (NAV per Unit)	432.86
Management Fee	2.15-2.3% p.a (max fee permitted by NPRA 2.5%)
Benchmark Returns	1.5% above average 182 day Tbill rate
Fund Managers	Databank Asset Mgt. Ser. Ltd & Tesah Capital.
Custodian	Stanbic Bank Ghana
Auditor	PricewaterhouseCoopers (PwC)
Regulator	The National Pensions Regulatory Authority (NPRA)

Performance (CAGR)

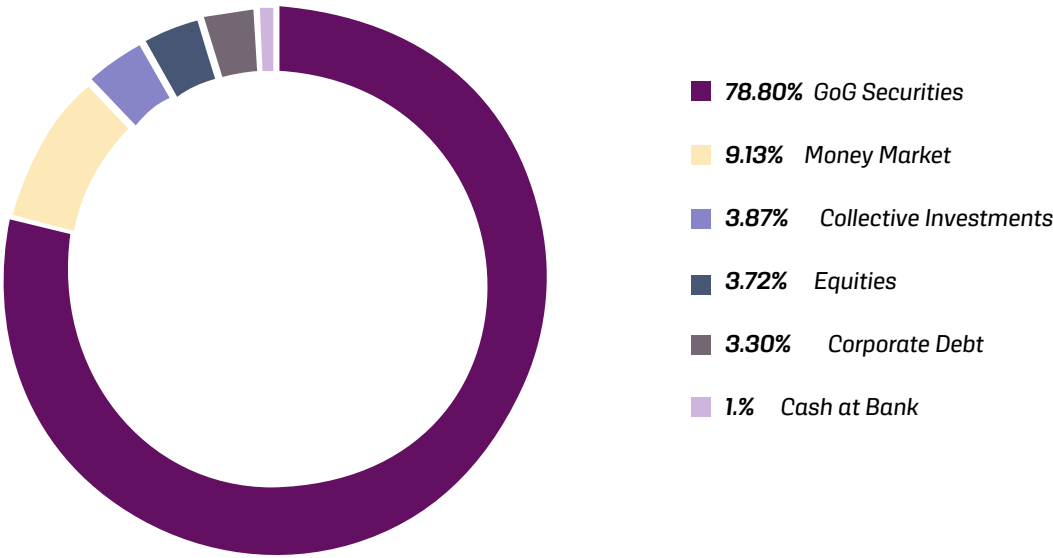


Performance (Calendar Year)



All returns are net of charges

>> Fact Sheet



Since inception, the Scheme has returned a Compounded Annual Growth Rate (CAGR) of 19.56%. The calendar year performance lagged behind the benchmark primarily due to substantial exposure to DDEP bonds, which delivered relatively lower returns. Additionally, the recognition of modification losses in accordance with IFRS 9 further impacted overall performance. The Scheme ended the year with assets under management of 1.49 billion from 1.14 billion in 2023 representing a growth of 31%. This growth is attributed to net contribution of 46% and net returns of 54%.

Risk Management

While the Scheme aims to optimize returns through a diversified investment strategy, members should remain aware of inherent risks such as market, credit, liquidity, inflation, regulatory, and currency risks. These risks are actively monitored and managed to safeguard the long-term sustainability of the fund.

>> **Financial Statements**

Statement Of Trustees Responsibilities

The National Pensions Act, 2008 (Act 766) as amended and the Occupational and Personal Pension Schemes (General) Regulations, 2011(L.I.1990) require the Trustees to prepare financial statements for each financial year which gives a true and fair view of the financial transactions of the Scheme for the year and of the disposition at year end of its assets and liabilities. It also requires the Trustees to ensure that the Scheme keeps proper accounting records which disclose with reasonable accuracy at any time the financial position of the Scheme. They are also responsible for safeguarding the assets of the Scheme.

The Trustees are responsible for the preparation of financial statements that give a true and fair view in accordance with International Financial Reporting Standards with the IAS 29 Hyperinflation directive issued by the Institute of Chartered Accountants Ghana (ICAG) and the requirements of the National Pensions Act, 2008 (Act 766) as amended and the Occupational and Personal Pension Schemes (General) Regulations, 2011 (L.I. 1990). The Trustees have instituted appropriate internal controls to avert cases of fraud or error from which material misstatements may arise.

The Trustees accept responsibility for the Annual financial statements, which have been prepared using appropriate accounting policies supported by reasonable and prudent judgments and estimates, in conformity with International Financial Reporting Standard with the IAS 29 Hyperinflation directive issued by the Institute of Chartered Accountants Ghana (ICAG) and in the manner required by the National Pensions Act, 2008 (Act 766) as amended and the Occupational and Personal Pension Schemes (General) Regulations, 2011 (L.I. 1990). The Trustees assert that the financial statements give a true and fair view of the state of the financial affairs of Underwriters Tier 2 Master Trust Pension Scheme.

For the Trustees:

Name of Independent Trustee: Dr. Frank Gamadey

Signature: 

Name of Trustee: Araba Asumanu

Signature: 

28th April 2025

>> Independent Auditor's Report

Report On The Audit Of The Financial Statements

Our Opinion

In our opinion, the accompanying financial statements give a true and fair view of the financial position of Enterprise Tier 3 Provident Fund Scheme (ET3PFS) (the "Scheme") as at 31st December 2024, and of its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards as issued by the International Accounting Standards Board ("IFRS Accounting Standards") with the IAS 29 directive issued by the Institute of Chartered Accountants Ghana, (ICAG) and in the manner required by the Occupational and Personal Pension Schemes (General) Regulations, 2011.

What we have audited

We have audited the financial statements of Enterprise Tier 3 Provident Fund Scheme for the year ended 31st December 2024

The financial statements comprise:

- the statement of net assets available for benefits as at 31st December 2024;
- the statement of changes in net assets available for benefits for the year then ended;
- the statement of movement in net assets available for benefits for the year then ended;
- the statement of cash flows for the year then ended; and
- the notes to the financial statements, comprising a summary of material accounting policy information and other explanatory information.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

We are independent of the Scheme in accordance with the International Code of Ethics for Professional Accountants (including International independence Standards) (the Code) issued by the International Ethics Standards Board for Accountants. We have fulfilled our other ethical responsibilities in accordance with the Code.

>> Independent Auditor's Report

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters:

Key audit matters	How our audit addressed the key audit									
<p>Derecognition loss on Government of Ghana Eurobond securities</p> <p>The gross Eurobond investment securities balance and derecognition loss as at 31 December 2024 were as follows</p> <table><tr><td></td><td>Amount</td><td>Derecognition loss</td></tr><tr><td></td><td>GH¢'000</td><td>GH¢'000</td></tr><tr><td>Investment securities- Eurobond</td><td>22,224</td><td>11,031</td></tr></table> <p>The Government of the Republic of Ghana reached an agreement in principle with the Eurobond holders regarding the treatment of the Eurobonds. Outstanding Bonds were exchanged for new ones based on two options known as the Disco Option or the Par Option.</p> <p>Derecognition loss for investment securities is material to the financial statements in terms of magnitude and level of subjective judgment applied by management.</p> <p>A derecognition loss GH¢11,031,000 was recognised as a result of the exchange of eligible bonds under the programme.</p> <p>The fair values of the new instruments on the date of exchange and the associated derecognition gain or loss was determined using discounted cash flow (DCF) models. The DCF models estimated the discount factors for the categories of bonds exchanged.</p> <p>The key areas of significant management judgement within the derecognition loss calculation include:</p> <ul style="list-style-type: none">• Evaluation of significant increase in credit definition of default and credit impaired assets focusing on both the qualitative and quantitative criteria used by the Scheme; Input assumptions (discount rate and estimated timing and amount of forecasted cashflows) applied to estimate the fair value. <p>The accounting policies, critical estimates and judgements and impairment charge are set out in notes 2g, 3, 5, 16 to the financial statements.</p>		Amount	Derecognition loss		GH¢'000	GH¢'000	Investment securities- Eurobond	22,224	11,031	<p>We obtained an understanding of the Eurobond based on the Exchange Memorandum issued by the Government of Ghana.</p> <p>We obtained an understanding for the option chosen by the Bank based on the approval of the Board.</p> <p>We tested the appropriateness of the staging of the investment securities by independently assessing management's criteria for significant increase in credit risk and definition of default against the requirements of the Standard.</p> <p>We evaluated the cash flows, discount rate and estimated timing used in determining the fair value of the exchange against the exchange memorandum.</p> <p>We tested the mathematical accuracy of the derecognition loss on investment securities.</p> <p>We assessed the appropriateness of the ECL related disclosures for investment securities in the financial statements in accordance with IFRS 9.</p>
	Amount	Derecognition loss								
	GH¢'000	GH¢'000								
Investment securities- Eurobond	22,224	11,031								

>> Independent Auditor's Report

Other information

The Trustees are responsible for the other information. The other information comprises Particulars of Service providers/advisors, Report of the Trustees and Statement of Trustees' responsibilities but does not include the financial statements and our auditor's report thereon.

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

In connection with our audit of the financial statements, our responsibility is to read the other information identified above and, in doing so, consider whether the other information is materially inconsistent with the financial statements, or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

If, based on the work we have performed on the other information, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of the Trustees for the Financial Statements

The Trustees are responsible for the preparation of financial statements that give a true and fair view in accordance with IFRS Accounting Standards with the IAS 29 directive issued by the Institute of Chartered Accountants, Ghana (ICAG) and in the manner required by Occupational and Personal Pension Schemes (General) Regulations, 2011, and for such internal control as the Trustees determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

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

The Trustees are responsible for overseeing the Scheme's financial reporting process.

>> Independent Auditor's Report

Auditor's Responsibilities for the Audit of the Financial Statements

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

As part of an audit in accordance with ISAs, we exercise professional judgement and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Scheme's internal control;
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Trustees;
- Conclude on the appropriateness of the Trustees' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Scheme's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Scheme to cease to continue as a going concern; and
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

>> Independent Auditor's Report

Auditor's Responsibilities for the Audit of the Financial Statements

continued

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

We also provide the Trustees with a statement that we have complied with relevant ethical requirements regarding independence, and have communicated with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with the Trustees, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

>> Independent Auditor's Report

Report on Other Legal and Regulatory Requirements

The Occupational and Personal Pension Schemes (General) Regulations, 2011 requires that in carrying out our audit we consider and report on the following matters. We confirm that:

- I. we have obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit;
- II. in our opinion proper books of account have been kept by the Scheme, so far as appears from our examination of those books; and
- III. the Scheme's balance sheet (statement of net assets available for benefits) and profit and loss account (statement of changes in net assets available for benefits) are in agreement with the books of account; and
- IV. the Scheme in all material respects complied with the requirements of Section 35 of the Occupational and Personal Pension Schemes (General) Regulations, 2011.

The engagement partner on the audit resulting in this independent auditor's report is Destiny Selorm Attatsitsey (ICAG/P/1619).



PricewaterhouseCoopers (ICAG/F/2024/028)
Chartered Accountants
Accra, Ghana



30th April, 2025

Statement of Net Assets Available for Benefits

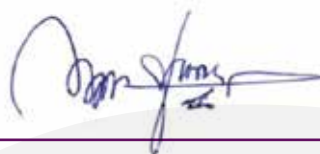
All amounts are in thousands of Ghana cedis

Assets	Note	Year ended 31 December	
		2024	2023
Cash and cash equivalents	4	17,666	4,440
Financial assets at amortised cost	5	1,360,393	1,116,683
Financial assets at fair value through profit or loss	6	113,205	16,665
Accounts receivable	7	126,438	66,795
		<u>1,617,702</u>	<u>1,204,583</u>
Liabilities			
Administrative expenses payable	8	4,757	1,680
Other payables	9	2,758	2,240
	10	<u>7,383</u>	<u>7,043</u>
		<u>14,898</u>	<u>10,963</u>
Total assets less liabilities		<u>1,602,804</u>	<u>1,193,620</u>
Represented by:			
Net assets available for benefits		<u>1,602,804</u>	<u>1,193,620</u>

The financial statements on pages 22 to 46 were approved for issue by the Board of Trustees on 29th April 2025 and were signed on their behalf by:



Araba Asumanu
Member of the Board of Trustees



Dr. Frank Gamadey
Independent Trustee

The notes on pages 26 to 46 form an integral part of the financial statements.

Statement of Changes in Net Assets Available for Benefits

All amounts are in thousands of Ghana cedis

	Note	Year ended 31 December	
		2024	2023
Dealings with members			
Contributors	11	362,075	321,501
Benefits	12	<u>(201,164)</u>	<u>(363,248)</u>
Net additions from dealings with members		<u>160,911</u>	<u>41,747</u>
Returns on investments			
Investment income	13	260,503	388,220
Less: Brokerage fees		<u>(125)</u>	<u>(50)</u>
Net investment income		<u>260,378</u>	<u>388,170</u>
Gain on investment securities at fair value through profit or loss	14	29,579	189
Impairment expense	5	<u>(1,899)</u>	<u>(31,582)</u>
Derecognition/modification loss	5	<u>(11,031)</u>	<u>(62,003)</u>
Administrative expenses	15	<u>(28,754)</u>	<u>(23,528)</u>
Increase in net assets for the year		<u><u>409,184</u></u>	<u><u>229,499</u></u>

The notes on pages 26 to 46 form an integral part of the financial statements.

Statement of Movement in Net Assets Available for Benefits

All amounts are in thousands of Ghana cedis

Net assets available for benefits	Note	Year ended 31 December	
		2024	2023
At start of year		1,193,620	964,121
Increase in net assets for the year		<u>409,184</u>	<u>229,499</u>
At end of year	16	<u><u>1,602,804</u></u>	<u><u>1,193,620</u></u>

The notes on pages 26 to 46 form an integral part of the financial statements.

Statement of Cash Flows

All amounts are in thousands of Ghana cedis

	Note	Year ended 31 December	
		2024	2023
Cash flows from operating activities			
Increase in net assets for the year		409,184	229,499
Adjusted for:			
Accrued interest	5	(87,284)	(83,459)
Derecognition/modification loss	6	29,593	(116)
Net valuation of financial assets at fair value through profit or loss	5	(11,031)	62,003
impairment expense	5	1,899	31,582
Working capital adjustments:			
Increase in benefits payable	8	3,077	139
Increase in administrative expense payable	9	518	(1,585)
Increase/(decrease) other payables	10	340	(8,521)
Increase in accounts receivable	7	<u>(59,643)</u>	<u>(38,137)</u>
Net cash generated from operating activities		<u>249,529</u>	<u>191,405</u>
Cash flows from investing activities			
Purchase of debt instruments	5	(521,422)	(1,280,731)
Purchase of equity instruments	6	(179,812)	(5,637)
Maturities debt instruments	5	(352,066)	1,073,224
Maturities equity instruments	6	<u>112,865</u>	<u>767</u>
Increase in net assets for the year		<u>(236,303)</u>	<u>(212,377)</u>
Net increase/(decrease) in cash and cash equivalents		13,226	(20,972)
Cash and cash equivalents as at 1 January	4	<u>4,440</u>	<u>25,412</u>
Cash and cash equivalents as at 31 December	4	<u><u>17,666</u></u>	<u><u>4,440</u></u>

The notes on pages 26 to 46 form an integral part of the financial statements

Notes**1. Scheme information**

The Scheme is a defined Contribution Scheme which provides lump sum benefits and such other ancillary benefits to members who meet the qualifying conditions stipulated under the National Pensions Act, 2008 (Act 766) as amended. The scheme is a master trust with membership opened to companies and their employees.

As at the date of reporting, the number of participating companies and employees of the Underwriters Tier 2 Master Trust Pension Scheme is 1,177 and 41,174 respectively.

2. Summary of material accounting policies

The principal accounting policies adopted in the preparation of these financial statements are set out below. These policies have been consistently applied to all years presented, unless otherwise stated.

(a) Basis of preparation

The financial statements of the Scheme have been prepared in accordance with IFRS Accounting Standards with the IAS 29 directive issued by the Institute of Chartered Accountants, Ghana (ICAG) and presented in compliance with the National Pensions Act, 2008 (Act 766) as amended, the Occupational and Personal Pension Schemes (General) Regulations, 2011 (L.I.1990) and relevant guidelines.

The ICAG issued a directive in January 2025 to accountants in business and accountants in practice on the application of IAS 29 in Ghana. The ICAG asserts in the directive that based on its analysis of the quantitative and qualitative indicators referred to in IAS 29, Ghana was not a hyperinflationary economy as of December 2024, therefore, IAS 29 will not be applicable for December 2024 financial reporting period. In compliance with the directive, the financial statements of the Company, including the comparative figures, have not been stated in terms of the measuring unit current at the end of the reporting period.

The financial statements summarise the transactions of the Scheme and deal with the net assets available to the members. They do not take account of obligations to pay benefits that fall due after the end of the year.

Basis of measurement and use of estimates and judgements

The financial statements have been prepared under the historical cost convention, except as modified by the revaluation of financial assets at fair value through profit or loss. The preparation of financial statements in conformity with IFRS requires the use of certain critical accounting estimates. It also requires the Board of Trustees to exercise judgement in the process of applying the Scheme's accounting policies. Areas involving a higher degree of judgement or complexity, or areas where assumptions and estimates are significant to the financial statements are disclosed in note 3.

Notes*continued***2. Summary of material accounting policies****(b) Changes in accounting policies and disclosures****(i) New and amended standards adopted by the Scheme**

The Company has applied the following standards and interpretations for the first time to financial reporting periods commencing on or after 1st January 2024:

- Classification of Liabilities as Current or Non-current – Amendments to IAS 1.
- Lease Liability in a Sale and/ Leaseback – Amendments to IFRS 16.
- Supplier Finance Arrangements – Amendments to IAS 7 and IFRS 7.

The amendments listed above did not have any impact on the amounts recognised in prior periods and are not expected to significantly affect the current or future periods.

(ii) New standards and interpretations not yet adopted

Certain new accounting standards, amendments to accounting standards and interpretations have been published that are not mandatory for 31st December 2023 reporting periods and have not been early adopted by the Scheme. These standards, amendments or interpretations are not expected to have a material impact on the entity in the current or future reporting periods and on foreseeable future transactions.

(c) Functional and presentation currency

The financial statements are presented in Ghana Cedis (GHS), which is the Scheme's functional and presentation currency. Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies are translated at the functional currency rate of exchange ruling at the end of the reporting period. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in the Statement of Changes in Net Assets Available for Benefits.

(d) Contributions

Contributions are recognized in the period in which they fall due. The Contributions are in compliance with rates as per the National Pensions Act, 2008 (Act 766) as amended and the Scheme's Governing Rules.

(e) Benefits

Benefits are recognized in the period in which they fall due. Benefits represent all valid benefit claims paid/payable during the year in compliance with the National Pensions Act, 2008 (Act 766) as amended and the Scheme Governing Rules.

Benefits payable to seceding members are recognised as liabilities in the period in which they fall due.

Notes

continued

2. Summary of material accounting policies

(f) Investment Income

Dividend Income from investments is recognised when the shareholders' right to receive payment has been established. Interest income is recognised for all interest-bearing instruments using the effective interest method. Interest income includes coupons earned on fixed income investments and accrued discount and premium on treasury bills and other discounted instruments.

(g) Financial assets and liabilities

Initial recognition and measurement

Financial assets and financial liabilities are recognised when the Scheme becomes a party to the contractual provisions of the instrument. Regular way purchases and sales of financial assets are recognised on trade-date, the date on which the Scheme commits to purchase or sell the asset.

At initial recognition, the Scheme measures a financial asset or financial liability at its fair value plus or minus transaction costs that are incremental and directly attributable to the acquisition or issue of the financial asset or financial liability.

When the fair value of financial assets and liabilities differs from the transaction price on initial recognition, the Scheme recognises the difference as follows:

- I. When the fair value is evidenced by a quoted price in an active market for an identical asset or liability (i.e. a Level 1 input) or based on a valuation technique that uses only data from observable markets, the difference is recognised as a gain or loss.
- II. In all other cases, the differences are deferred and the timing of recognition of deferred day one profit or loss is determined individually. It is either amortised over the life of the instrument, deferred until the instrument's fair value can be determined using market observable inputs, or realised through settlement.

Classification and subsequent measurement

Financial assets

The Scheme applies IFRS 9 and classified its financial assets in the following measurement categories:

- At fair value through profit or loss (FVPL); and
- At amortised cost.

The classification depends on the Scheme's business model for managing the financial assets and the contractual terms of the cash flows.

For assets measured at fair value, gains and losses will either be recorded in profit or loss.

Notes*continued***2. Summary of material accounting policies****(g) Financial assets and liabilities****Classification and subsequent measurement**

For investments in equity instruments that are not held for trading, this will depend on whether the Scheme has made an irrevocable election at the time of initial recognition to account for the equity investment at fair value through other comprehensive income (FVOCI).

The Scheme classifies its financial assets at amortised cost only if the asset is held within a business model whose objective is to collect the contractual cash flows, and the contractual terms give rise to cash flows that are solely payments of principal and interest.

The business model reflects how the Scheme manages the assets in order to generate cash flows. Factors considered by the Scheme in determining the business model for a group of assets include past experience on how the cash flows for these assets were collected, how the asset's performance is evaluated and reported to the Board of Trustees, how risks are assessed and managed and how the Fund managers are compensated.

Where the business model is to hold assets to collect contractual cash flows or to collect contractual cash flows and sell, the Scheme assesses whether the financial instruments' cash flows represent solely payments of principal and interest (the 'SPPI test').

Impairment

The loss allowances for financial assets are based on assumptions about risk of default and expected loss rates. The Scheme uses judgement in making these assumptions and selecting the inputs to the impairment calculation, based on the Scheme's past history, existing market conditions as well as forward looking estimates at the end of each reporting period.

Modification of financial assets

If the Scheme renegotiates the terms of financial assets which are substantially different, it derecognises the original financial asset and recognises a 'new' asset at fair value and recalculates a new effective interest rate for the asset. The date of renegotiation is consequently considered to be the date of initial recognition for impairment calculation purposes, including for the purpose of determining whether a significant increase in credit risk has occurred.

However, the Scheme also assesses whether the new financial asset recognised is deemed to be credit-impaired at initial recognition, especially in circumstances where the renegotiation was driven by the debtor being unable to make the originally agreed payments. Differences in the carrying amount are also recognised in profit or loss as a gain or loss on derecognition.

Notes

continued

2. Summary of material accounting policies

(g) Financial assets and liabilities

Modification of financial assets

If the renegotiated terms are not substantially different, the renegotiation or modification does not result in derecognition, and the Scheme recalculates the gross carrying amount based on the revised cash flows of the financial asset and recognises a modification gain or loss in profit or loss. The new gross carrying amount is recalculated by discounting the modified cash flows at the original effective interest rate (or credit-adjusted effective interest rate for purchased or originated credit-impaired financial assets).

Derecognition

The Scheme derecognises a financial asset when the contractual rights to the cash flows from these assets expire, or it transfers the rights to receive the contractual cash flows on the financial asset in a transaction in which substantially all the risks and rewards of ownership of the financial asset are transferred or which the Scheme neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset. Any interest in transferred financial assets that is created or retained by the Scheme is recognised as a separate asset or liability.

Financial liabilities

The Scheme's holding in financial liabilities represents mainly benefits payable and administrative expenses payable to members and service providers respectively. Such financial liabilities are initially recognised at fair value and subsequently measured at amortised cost.

Derecognition

The Scheme derecognises a financial liability when its contractual obligations are discharged or cancelled or expired.

Offsetting financial instruments

Financial assets and liabilities are set off and the net amount presented in the net assets available for benefits when, and only when, the Scheme has a legal right to set off the amounts and intends either to settle on a net basis, or to realise the asset and settle the liability simultaneously.

Notes*continued***2. Summary of material accounting policies****(g) Financial assets and liabilities****Write-offs**

The Scheme writes off financial assets as bad debt when the following have occurred; either upon liquidation, inability to locate issuer for over 6 months. Such events provide an indication that there is no reasonable expectation of recovery. It is the Scheme's policy to follow up on all defaulters and to use reasonable means to recover bad debt after write off.

(h) Provisions

Provisions are recognised when the Scheme has a present legal or constructive obligation as a result of past events it is more likely than not that an outflow of resources will be required to settle the obligation and the amount can be reliably estimated. Where the obligation is expected to be settled over a period of years, the provision is discounted using a discount rate appropriate to the nature of the provision.

(i) Cash and cash equivalents

Cash and cash equivalents include cash in hand, deposits held at call with banks, other short term highly liquid investments with original maturities of three months or less and bank overdrafts.

(j) Administrative expenses

Administrative expenses are recognised in the statement of changes in net assets available for benefits when incurred.

3. Critical accounting estimates and judgements

Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. In particular, critical estimates are made by the Trustees in determining the fair value of investments that are not traded in an active market.

Determining fair values

The determination of fair values for financial assets for which there is no observable market price requires the use of valuation models. The fair value hierarchy of the financial assets of the Scheme is set out in note 19.

Measurement of the expected credit loss allowance

The measurement of the expected credit loss allowance for financial assets measured at amortised cost is an area that requires the use of models and significant assumptions about future economic conditions and credit behaviour (e.g. the likelihood of customers defaulting and the resulting losses).

Notes continued

3. Critical accounting estimates and judgements

The method applied in the determination of impairment charge on the Scheme’s financial assets measured at amortised cost is set out under note 17 of these financial statements.

4. Cash and cash equivalents

	2024	2023
Cash at bank	<u>17,666</u>	<u>4,440</u>

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

5. Financial assets at amortised cost

<u>Year ended 31 December 2024</u>	Government securities	Fixed deposits	Corporate debt	Total
Gross financial assets:				
At start of year	1,114,380	7,547	3,249	1,125,176
Additions	75,019	397,508	48,895	521,422
Deductions	(84,359)	(271,055)	(5,108)	(360,522)
Derecognition loss	(11,031)	-	-	(11,031)
Accrued interest	81,116	2,331	3,837	87,284
At end of year	<u>1,175,125</u>	<u>136,331</u>	<u>50,873</u>	<u>1,362,329</u>
At end of year				
Impairment provision:				
At start of year	(8,456)	(28)	(9)	(8,493)
Derecognition of impairment	8,456	-	-	8,456
(Charge)/release for the year	<u>-</u>	<u>(166)</u>	<u>(1,733)</u>	<u>(1,899)</u>
	<u>-</u>	<u>(194)</u>	<u>(1,742)</u>	<u>(1,936)</u>
Net financial assets	<u>1,175,125</u>	<u>136,137</u>	<u>49,131</u>	<u>1,360,393</u>
<u>Year ended 31 December 2023:</u>				
Gross financial assets:				
At start of year	906,030	-	72,998	979,028
Settlement on exchange	1,113,075	81,926	2,915	1,197,916
Exchange bonds/matured securities	(926,016)	(74,425)	(72,783)	(1,073,224)
Modification loss	(62,003)	-	-	(62,003)
Accrued interest	83,294	46	119	83,459
At end of year	<u>1,114,380</u>	<u>7,547</u>	<u>3,249</u>	<u>1,125,176</u>
Impairment provision:				
At start of year	(55,299)	-	(4,427)	(59,726)
Charge for the year	(35,972)	(28)	4,418	(31,582)
Release for the year	<u>82,815</u>	<u>-</u>	<u>-</u>	<u>82,815</u>
At end of year	<u>(8,456)</u>	<u>(28)</u>	<u>(9)</u>	<u>(8,493)</u>
Net financial assets	<u>1,105,924</u>	<u>7,519</u>	<u>3,240</u>	<u>1,116,683</u>

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

6. Financial assets at fair value through profit or loss

<u>Year ended 31 December 2024</u>	Equity Investments	Collective Investments	Total
At start of year	16,030	635	16,665
Additions	18,549	161,263	179,812
Disposals	-	(112,865)	(112,865)
Change in fair value	<u>20,904</u>	<u>8,689</u>	<u>29,593</u>
At end of year	<u><u>55,483</u></u>	<u><u>57,722</u></u>	<u><u>113,205</u></u>
<u>Year ended 31 December 2023</u>			
At start of year	10,251	1,428	11,679
Additions	5,637	-	5,637
Disposals	-	(767)	(767)
Change in fair value	<u>142</u>	<u>(26)</u>	<u>116</u>
At end of year	<u><u>16,030</u></u>	<u><u>635</u></u>	<u><u>16,665</u></u>

Equity investments consist of shareholdings in the following entities:

	2024	2023
MTN Ghana	41,316	5,388
GCB Bank Limited	5,230	2,792
Standard Chartered Bank PLC	2,384	1,819
Ecobank Ghana PLC	2,212	1,872
Societe Generale Ghana Limited	1,641	1,717
Fan Milk Limited	811	713
Total Petroleum Ghana PLC	787	540
Cal Bank PLC	485	665
Tullow Oil PLC	209	209
Ghana Oil Company Limited	168	165
Unilever Ghana PLC	107	45
Benso Oil Palm Plantation Ltd	66	57
Republic Bank Ghana PLC	60	45
Ecobank Transnational Incorporated	7	3
	<u><u>55,483</u></u>	<u><u>16,030</u></u>

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

6. Financial assets at fair value through profit or loss

Collective investments consist of holdings in the following funds:

	2024	2023
Databank Mfund	-	23
IC security	52,574	-
Enhanced equity beta	3,313	-
New gold	1,112	-
EDC Bfund	528	612
RBG Unit Trust	195	-
	<u>57,722</u>	<u>635</u>

7. Accounts receivable

	2024	2023
Contributions outstanding	126,424	66,781
Other receivables**	<u>14</u>	<u>14</u>
	<u>126,438</u>	<u>66,795</u>

Other Receivable** – Refund of withholding taxes on benefits

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

8. Benefits payable

	2024	2023
Withdrawals payable	2,259	934
Taxes payable on withdrawals	<u>2,498</u>	<u>746</u>
	<u>4,757</u>	<u>1,680</u>

9. Administrative expenses payable

	2024	2023
NPRA fees	413	332
Trustee (administrator) fees payable	1,630	1,329
Fund manager fees payable	412	332
Custodian fees payable	250	202
Audit fees payable	53	45
Total administrative expenses payable	<u>2,758</u>	<u>2,240</u>

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

10. Other payables

	2024	2023
Outstanding Trustee fee on unallocated funds	37	13
Contribution refund	111	-
Amounts payable to Central Securities Depository	7,235	7,030
	<u>7,383</u>	<u>7,043</u>

11. Contributions

	2024	2023
Contributions received	302,430	283,377
Contributions outstanding	59,645	38,124
	<u>362,075</u>	<u>321,501</u>

12. Benefits

	2024	2023
Lump sum benefit paid	196,407	361,568
Lump sum benefit payable	4,757	1,680
	<u>201,164</u>	<u>363,248</u>

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

13. Investment income

	2024	2023
Interest on treasury bonds	229,276	369,431
Interest on money market securities	13,783	982
Interest on corporate bonds	3,846	10,279
Dividend income	3,233	212
Other income (Exchange gain, discount & call interest)	10,365	7,316
	<u>260,503</u>	<u>388,220</u>

14. Gains on investment income

	2024	2023
Gain on disposal of ordinary shares holdings	20,903	74
(Loss)/gains from valuation collective investments	(13)	27
Gain/(loss) on valuation of ordinary shares holdings	8,689	142
	<u>29,579</u>	<u>189</u>

15. Administrative expenses

	2024	2023
NPRA fees	4,349	3,547
Trustees fees	17,395	14,185
Fund manager fees	4,339	3,639
Custodian fees	2,581	2,093
Auditor's remuneration	90	64
	<u>28,754</u>	<u>23,528</u>

Notes

continued

16. Net assets available for benefits

<u>Year ended 31 December 2024</u>	<u>Cumulative Contribution</u>	<u>Cumulative Net Investment Income and expenses</u>	<u>Total</u>
At start of year	361,073	832,547	1,193,620
Additions	362,075	289,957	652,032
Deductions	<u>(201,164)</u>	<u>(41,684)</u>	<u>(242,848)</u>
At end of year	<u>521,984</u>	<u>1,080,820</u>	<u>1,602,804</u>
At start of year	402,820	561,301	964,121
Additions	321,501	388,170	709,671
Deductions	<u>(363,248)</u>	<u>(116,924)</u>	<u>(480,172)</u>
At end of year	<u>361,073</u>	<u>832,547</u>	<u>1,193,620</u>

The Scheme's policy over credit risk is to minimise its exposure to counterparties with perceived higher risk of default by dealing only with counterparties that meets the standards set out in the NPRA guidelines and the Scheme's investment policy statement.

The Scheme adopts a three-stage approach for impairment assessment based on changes in credit quality from initial recognition.

17. Financial risk management, objectives and policies

Risk management framework

The Trustees have overall responsibility for the establishment and oversight of the Scheme's Risk Management framework.

The Scheme's Risk Management policies are established to identify and analyse the risks faced by the Scheme, to set appropriate risk limits and controls, and to monitor risks and adherence to limits.

The Trustees, through the standards and procedures aims to develop a disciplined and constructive control environment, in which all Trustees understand their roles and obligations. The Trustees are responsible for monitoring compliance with risk management policies and procedures, and for reviewing the adequacy of the risk management framework in relation to risks faced by the Scheme.

Notes

continued

17. Financial risk management, objectives and policies

Credit risk

An Investment Asset Allocation Policy which is aimed at ensuring that the Trustees positions the Scheme's portfolio to amass optimal returns within the changing market environment and expectations while ensuring that the corpus, risk and performance of the investment portfolio remains relatively safe and sound, is reviewed and approved by the Board of Trustees.

The Scheme's policy over credit risk is to minimise its exposure to counterparties with perceived higher risk of default by dealing only with counterparties that meet the standards set out in the NPRA guidelines and the Scheme's investment policy statement.

The Scheme adopts a three-stage approach for impairment assessment based on changes in credit quality from initial recognition.

- **Stage 1** – Where there has not been a significant increase in credit risk (SICR) since initial recognition of a financial instrument, an amount equal to 12 months expected credit loss is recorded. The expected credit loss is computed using a probability of default occurring over the next 12 months. For those instruments with a remaining maturity of less than 12 months, a probability of default corresponding to remaining term to maturity is used.
- **Stage 2** – When a financial instrument experiences a SICR subsequent to origination but is not considered to be in default, it is included in Stage 2. This requires the computation of expected credit loss based on the probability of default over the remaining estimated life of the financial instrument.
- **Stage 3** – Financial instruments that are considered to be in default are included in this stage. Similar to Stage 2, the allowance for credit losses captures the lifetime expected credit losses.
- **POCI:** Purchased or originated credit impaired (POCI) assets are financial assets that are credit impaired on initial recognition. POCI assets are recorded at fair value at original recognition and interest income is subsequently recognised based on a credit-adjusted EIR. The ECL allowance is only recognised or released to the extent that there is a subsequent change in the expected credit losses.

The Scheme has defined credit impaired financial assets as when the issuer becomes 90 days past due on its contractual payments or when there is qualitative information of the issuer being in significant financial difficulty.

The expected loss model is developed using statistical techniques based on actual historical data. The expected loss is calculated using parameter estimates including the probability of default ('PD'), exposure at default ('EAD') and loss given default ('LGD').

The Scheme utilised the 30-days past due definition to determine a significant increase in credit risk.

Notes

continued

17. Financial risk management, objectives and policies

Credit risk

Impact of Ghana’s Domestic Debt Exchange Programme (DDEP) on investment securities

On 31 July 2023, the Government of Ghana announced Ghana’s pensions’ Domestic Debt Programme (DDEP). The Programme invited eligible bondholders to voluntarily exchange eligible local currency bonds issued by the Government of Ghana, ESLA and Daakye bonds for a new series of bonds to be issued by the Government.

The Programme sought to extend the tenures of the eligible securities and reduce their coupons to an effective rate of about 22.35%. The Government also explained that the holders of the old bonds will receive two (2) new bonds that mature in 2027 and 2028 at the rates of 58% and 57% for each year respectively. Also, included as part of the exchange is an interest only bond ending in 2027 and 2028 in the ratio of 50% and 50% for both years.

The Scheme assessed the bonds eligible for exchange under the DDEP as credit-impaired. As a result, the carrying amounts of the existing bonds were reduced to the fair value of the new bonds calculated as the present value of the cash flows using discount rates of 22.54%. The difference between the fair value of the new instruments and the carrying amount of the original assets was recognised as modification gain or losses in the statement of comprehensive income.

There was no impairment charge recognized on these instruments for the year ended 31 December 2024.

	2023
Carrying amount on date of exchange	1,049,891
Fair value on date of exchange	<u>(987,888)</u>
Modification loss	<u>62,003</u>

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

17. Financial risk management, objectives and policies

Credit risk

Impact of Ghana's Domestic Debt Exchange Programme (DDEP) on investment securities

The Scheme assessed the bonds eligible for exchange under the DDEP as credit-impaired. As a result, the carrying amounts of the existing bonds were reduced to the fair value of the new bonds calculated as the present value of the cash flows using discount rates of 22.54%. The difference between the fair value of the new instruments and the carrying amount of the original assets was recognised as modification gain or losses in the statement of comprehensive income.

Modification Assessment of Government of Ghana Eurobonds

The Scheme used the principles of IFRS 9 to assess for modification. Where the contract terms of debt instruments are modified, an assessment is performed to ascertain if the new terms are "substantially different" from the old terms. This is to determine if the modification is significant or not. Where the modification is deemed to be significant, the old instrument is derecognized and the new instrument recognized as a new asset in line with the standard.

On June 24, 2024, the Government of Ghana (GoG) reached an Agreement in Principle (AIP) with Eurobond holders, represented by the International Steering Committee and Regional Steering Committee (the "Steering Committees"), to restructure approximately \$13.1 billion of external debt. The restructuring initiative was aimed at alleviating Ghana's debt burden and fostering economic recovery, as part of an IMF-supported program.

Below is the summary of the terms of the exchanged:

- Investors had two options to choose from; Discount option and par option (capped at \$1.6 million). The bondholders agreed to a nominal haircut of 37% on the principal amount, resulting in a reduction of approximately \$4.7 billion of claims. The haircut applied to only the discount option.
- Bondholders will also provide cash flow relief amounting to approximately \$4.4 billion during the IMF program period, easing the financial pressure on the GoG.
- The restructuring involved the issue of 4 new Eurobonds with maturities extending up to 2037 to replace the old Eurobonds. This was aimed at providing the government with physical space that would ensure financial stability.

The scheme participated in the Eurobond exchange program and opted for the discount option due to its high coupon rate and relatively shorter maturity. A total of about US of the old Eurobonds was exchanged with four new Eurobonds with total face value of \$1.05 million after suffering haircut.

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

17. Financial risk management, objectives and policies

Credit risk

Valuation of Eurobonds

The restructure of the government of Ghana Eurobonds was considered significant modification of the financial asset. As a result, the old Eurobonds were derecognized and the new bonds received was recognized as new financial assets.

In line with IFRS 9, the new bonds were recognized at fair value. A discount rate of 8% was used to determine the prices of the new bonds at on the day of the exchange. The market prices of the bonds immediately after the exchange is significantly different from our valuation prices.

	2024
Carrying amount on date of exchange	32,810
Fair value on date of exchange	<u>(21,779)</u>
Derecognition loss	<u>11,031</u>

There was no impairment charge recognized on these instruments for the year ended 31 December 2024 (2023: nil).

Maximum exposure to credit risk

The Scheme's maximum exposure to credit risk is as follows:

	2024	2023
Cash and cash equivalents	17,666	4,440
Financial assets at amortised cost	1,362,328	1,125,176
Accounts receivable	<u>126,438</u>	<u>66,795</u>
	<u>1,506,432</u>	<u>1,196,411</u>

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

16. Financial risk management, objectives and policies

Credit risk

31 December 2024

	Stage 1	Stage 2	Stage 3	POCI	Total
Cash and cash equivalents	17,666	-	-	-	17,666
Financial assets at amortised cost	136,331	50,873	1,152,900	22,224	1,362,328
Accounts receivable	126,438	-	-	-	126,438
Gross carrying amount	280,435	50,873	1,152,900	22,224	1,506,432
Loss allowance	(194)	(1,742)	-	-	(1,936)
Carrying amount	280,241	49,131	1,152,900	22,224	1,504,496

31 December 2023

	Stage 1	Stage 2	Stage 3	POCI	Total
Cash and cash equivalents	4,440	-	-	-	4,440
Financial assets at amortised cost	7,547	104,145	1,013,484	-	1,125,176
Accounts receivable	66,795	-	-	-	66,795
Gross carrying amount	78,781	104,145	1,013,484	-	1,196,411
Loss allowance	(28)	(2,000)	(6,465)	-	(8,493)
Carrying amount	78,759	102,145	1,007,019	-	1,187,918

Liquidity risk

Liquidity risk is the risk associated with a situation where the Scheme does not have sufficient financial resources available to meet all of its obligations and commitments when they fall due or can access them at an excessive cost. A threshold amount has been set based on historical accrued benefits paid to ensure that this risk is mitigated wholly.

Market risk

Market Risk is the risk associated with changes in market prices, such as interest rate, equity prices and foreign exchange rates that will affect the Scheme's income or the value of its portfolio of financial instruments. This systematic risk cannot be mitigated through diversification. The Scheme hedges this risk by having active currency allocations.

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

16. Financial risk management, objectives and policies

Price risk

Listed equity securities are susceptible to market price risk arising from uncertainties about future values of the investment securities. Keen attention is paid to the equity market to realize capital gains on equity securities. At 31 December 2024, if the prices of all Equity Securities and Collective instruments had increased/decreased by 1% with all other variables held constant, the 'increase in net assets available for benefits' for the year would have been GHS 162,000 higher/lower (2023: GHS 111,319).

Interest Rate risk

Interest risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Schemes investment horizon has moved towards the shorter tenor investments as they offer less interest rate risk. For some of the bonds with issuers other than the Government of Ghana, investments are placed with a floating rate to hedge against this risk.

At 31 December 2024, a change of 1% in interest rates with all other variables held constant would have resulted in an increase/decrease in the Net Assets Available for Benefits' of GHS 2,043,000 (2023: GHS 2,034,276) arising substantially from the change in market values of debt securities.

17. Tax status of the Scheme

The Underwriters Tier 2 Master Trust Pension Scheme has been approved by the National Pensions Regulatory Authority and is exempt from income tax on its investment income in accordance with Section 94 (2) of the Income Tax Act 2015 (Act 896) as amended.

18. Fair value measurements

Fair value hierarchy

IFRS 7 specifies a hierarchy of valuation techniques based on whether the inputs to those valuation techniques are observable or unobservable. Observable inputs reflect market data obtained from independent sources; unobservable inputs reflect the Scheme's market assumptions. These two types of inputs have created the following fair value hierarchy:

Level 1 – Quoted prices in active markets for identical assets or liabilities. This level includes equity securities listed on the Ghana Stock Exchange.

Level 2 – Inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (as prices) or indirectly (derived from prices). This level includes collective investments and alternative investments.

Notes

continued

(All amounts are in thousands of Ghana cedis unless otherwise stated)

18. Fair value measurements

Level 3 – inputs for the asset or liability that are not based on observable market data (unobservable inputs). This level includes equity investments and debt instruments with significant unobservable components.

The hierarchy of the financial assets of the Scheme at the end of the year is as follows:

At 31 December 2024	Level 1	Level 2	Total
Financial assets at fair value through profit and loss	55,484	57,722	113,206
At 31 December 2023	Level 1	Level 2	Total
Financial assets at fair value through profit and loss	16,030	635	16,665

Financial assets measured at level 3 in the fair value hierarchy relates to alternative investment as at 31 December 2024 (2023: Nil).

19. Related parties

Related party transactions and balances
The related parties are the Trustees and Members of the Scheme.
Related party balances and transactions are in respect of fees, contributions and benefits disclosed in **notes 8, 9, 10, 11, 12 and 15** to the financial statements.

20. Commitments and contingencies

As at the date of reporting, there were no outstanding commitments or contingencies (2023: nil).

21. Events after the reporting period

There were no material events after the reporting date that require disclosure in or adjustment to the financial statements for the year ended 31st December 2024.



The grind don't stop!
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