

**ENTERPRISE TIER 3 PROVIDENT FUND SCHEME**  
**ANNUAL REPORT AND FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED 31 DECEMBER 2024**

**Enterprise Tier 3 Provident Fund Scheme**  
Annual report  
for the year ended 31 December 2024

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## **Enterprise Tier 3 Provident Fund Scheme**

Annual report

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### **PARTICULARS OF SERVICE PROVIDERS / ADVISORS**

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

## **Enterprise Tier 3 Provident Fund Scheme**

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### **REPORT OF THE TRUSTEES**

The Trustees present their report together with the audited financial statements of Enterprise Tier 3 Provident Fund Scheme (the "Scheme") for the year ended 31 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 1 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.

<b>Scheme membership statistics</b>	<b>Members</b>
At 1 January 2024	43,778
Withdrawals during the year	(2,148)
Joiners during the year	<u>4,503</u>
At 31 December 2024	<u>46,133</u>

#### **Summary statistics of withdrawals**

Transfers-out	29
Retrenchment	143
Resignation	1,081
Termination	696
Permanent Emigration	20
Retirement (Statutory/Early)	161
Death	<u>18</u>
	<u>2,148</u>

## **Enterprise Tier 3 Provident Fund Scheme**

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### **REPORT OF THE TRUSTEES (continued)**

#### *Retirement benefits*

Members of the Scheme are entitled to lump sum payments from balances standing to the credit of their accrued benefits or personal savings upon retirement.

#### *Termination terms*

In the event of winding up of the Scheme:

- i. Contributions made by the employer on behalf of each member before the vesting period shall not be available to the liquidator of the Scheme.
- ii. Unpaid contributions of the employer and payroll deductions made from the contributor's salary which have been remitted to a trustee at the time of liquidation shall have priority over any other debt.

Where the Scheme is being liquidated:

- i. The Trustees shall not receive any contribution from the date of commencement of the winding-up.
- ii. Any other schemes operated by the Trustees may be merged with a scheme operated by another trustee with the approval of members of the Scheme and with directions from the Board of the National Pensions Regulatory Authority.
- iii. The merger shall be conducted by the other trustee through the transfer of assets and liabilities of the Scheme by the trustee to that trustee.

Where the registration of a custodian is being withdrawn, the Trustees shall appoint another custodian approved by the governing Board of the National Pensions Regulatory Authority with the approval of members.

### **Access to information**

#### *Online Platform:*

As part of the service offering, members have access to an online self-service platform called 'the Stable'. The Stable allows members to check on payments made on their behalf, view and print statements, upload beneficiary details, make enquiries online, make amendment requests, download benefit payment forms and download and print Membership Certificates. The online self-service platform can be accessed at <https://thestable.etportal.app/portal/index?faces-redirect=true>

#### *Call Centre:*

Members have access to a Call Centre service. Individual members are able to reach the Scheme administrator with their concerns for prompt feedback by calling +233 302 634704 or emailing to [complaints.trustees@myenterprisegroup.com.io](mailto:complaints.trustees@myenterprisegroup.com.io).

**REPORT OF THE TRUSTEES (continued)**

**Access to information (continued)**

The Administrator, Enterprise Trustees LTD, periodically distributes important pension updates to all members of the Scheme through its newsletter "*The Trustees*." In addition, monthly member summary statements are emailed directly to members.

*Advantage Report:*

The Advantage Report, which provides a detailed overview of the Scheme's performance over a given period, is circulated to members on a quarterly basis. The report highlights the growth and overall performance of the Scheme.

*SMS notification:*

SMS notifications are sent to members alerting them of their monthly contributions and any other relevant information.

*Enterprise Market and branches:*

The Scheme's Administrator, Enterprise Trustees LTD, operates a network of branches across the country to provide members with convenient access to information and in-person transaction support. Currently, there are seven (7) branches nationwide, located as follows: three (3) in Accra, and one (1) each in Tema, Kumasi, Tamale, and Takoradi.

*Stakeholder forums:*

As part of efforts to enhance engagement with members, Enterprise Trustees LTD established the Members Stakeholder Forum. The forum aims to update members on the Trustees' stewardship and the performance of the Scheme. It also provides a platform for members to interact directly with senior management and the Trustees, including the Independent Trustee.

*Annual General Meeting:*

The Scheme organized its maiden Annual General Meeting (AGM) in 2024 with the aim of promoting transparency and accountability. The meeting offered a platform for member feedback and questions, while also outlining the strategic direction and future plans for the Scheme.

*Social Media platforms:*

Enterprise Trustees LTD maintains an active presence on X, Facebook, LinkedIn, and Instagram to engage with members and share timely updates.

## **REPORT OF THE TRUSTEES (CONTINUED)**

### **Investment report**

#### **Statement of Investment Principles:**

We the Board of Trustees attest that Scheme funds have been invested with the objective of obtaining safe and fair returns in accordance with National Pensions Act, 2008 (Act 766) and any amendments thereafter and Occupational and Personal Pension Schemes (General) Regulations, 2011 (L.I.1990). We confirm that there has been full compliance with prohibitions on investments which include but are not limited to, use of Pension Fund assets as collateral, investing outside Maximum Allowable limits, investing outside the scope of Assets stipulated by the Investment Guidelines and investing in securities issued by any issuer for which there exists a conflict of interest.

#### **Particulars of Investment Policy:**

The Scheme seeks to provide for the payment of lump sum benefits to members when they retire or should any unforeseen event occur in relation to the Members. To achieve this broad objective, the Scheme seeks to achieve a total rate of return sufficient to provide generous current distributions to the members and to allow for the growth necessary to increase future distributions. The Scheme is managed on a going-concern basis with the primary objective of providing high rates of return, consistent with prevailing market conditions, a high-quality standard of investment, and moderate levels of risk.

The objective of the Trustees is to achieve a net return of 1.5% above the average 182-day treasury bill rate per annum. The primary objective in the investment management for the Scheme's assets shall be to emphasize long-term growth of the principal within reasonable and prudent levels of risk. Short-term volatility will be tolerated in as much as it is consistent with the volatility of a comparable market index.

In pursuance of the requirement of Act 766, the Trustees will maintain constituent funds, each with a different investment objective. To diversify investment risk and achieve the above investment objectives, the Scheme's assets will be invested in the major asset classes and allocations will be maintained within the corresponding ranges according to the Investment Policy of the Portfolio. This will be reviewed periodically to reflect changes in the market.

Under the current macro-economic environment and considering the available investment instruments in Ghana, The Board of Trustees has adopted the recommended maximum limit to investment instruments required by the National Pensions Regulatory Authority.

Investment strategy is dynamic and therefore as new investment instruments are introduced into the market, the Trustees will consider whether or not these assets fall into the category of acceptable and appropriate investments for the pension portfolio.

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**REPORT OF THE TRUSTEES (CONTINUED)**

**Investment report (continued)**

**Particulars Of Investment Policy (continued)**

The Minimum expected yield of the portfolio of investments are:

Cash and cash equivalents	:	Call Rate
Government Bills	:	Treasury Bill Rate
Municipal Bond & Bills	:	As Agreed
Fixed Income Fund	:	Average 182-day Treasury bill rate plus
Corporate Bonds	:	As Agreed
Equity	:	GSE/Databank Index
Collective Investments	:	Average of 182-Day Treasury bill rate %
Alternative Investments	:	As Agreed

This serves as the Fund Manager's benchmarks in terms of yields or returns on their portfolio.

This Investment Policy until revised remains to be the duly approved Investment Policy governing the Enterprise Tier 3 Provident Fund Scheme.

**Investment Allocation**

The table below shows the Scheme's asset mix as set out in the Statement of Investment Policy and the actual asset mix as of 31 December 2024.

Asset Type	Maximum	Actual	Investment Income	Gross Amount	Gross Amount
			2024	2024	2023
	%	%	GHS	GHS	GHS
Government of Ghana Securities	75	79.64	229,276	1,175,125	1,114,380
Corporate debt securities	35	3.45	3,846	50,873	3,249
Money market securities	35	9.24	13,783	136,331	11,987
Listed equities instruments	20	3.76	3,233	55,483	16,030
Collective investments	15	3.91	-	57,722	635
<b>TOTAL</b>		<u>100</u>	<u>250,138</u>	<u>1,475,534</u>	<u>1,146,281</u>



**Enterprise Tier 3 Provident Fund Scheme**  
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**REPORT OF THE TRUSTEES (continued)**

**Net assets available for benefits**

The value of Net assets available for benefit of members as at 31 December 2024 is GHS 1,602,804,000. The movement in the Scheme's net asset is set out on page 16 of the financial statements.

**EXPENSES**

All expenses of the Scheme are charged against the Scheme. We confirm that expenses charged and deducted from the Scheme funds are those allowable under the National Pensions Act, 2008 (Act 766) as amended, guidelines on fees and charges and any other directives issued by the Authority from time to time. The applicable fee rate per service provider is accrued on a daily basis and charged out for payment on a monthly basis.

Set out below is a summary of expenses incurred by the Scheme during the year as well as actual rates applied compared to the maximum allowable rate set by the Regulator.

Asset Type	Maximum Rate	Actual Rate	2024	2023
			Current	Previous
			Year	Year
			Amount	Amount
	% p.a.	% p.a.	GHS	GHS
NPRA fees	0.33	0.33	4,349	3,546
Trustees fees	1.33	1.32	17,395	14,186
Custodian fees	0.28	0.20	2,581	2,093
Fund Manager fees	0.56	0.33	4,339	3,639
Audit fees	N/A	N/A	<u>90</u>	<u>64</u>
			<b><u>28,754</u></b>	<b><u>23,528</u></b>

## REPORT OF THE TRUSTEES (continued)

### TRUSTEES

The membership of the Board of trustees are as follows:

Name	NPRA licence number	Position	Date of appointment	Date of exit
Mr. Fiifi Kwakye	NPRA15013	Chairman	1 December 2011	
Mr. John Fiam-Coblavie	NPRA16008	Independent Trustee	15 July 2016	31 December 2024
Mr. Joseph Ampofo	NPRA15010	Member	16 April 2012	
Mrs. Araba Asumanu	NPRA16115	Member	25 July 2016	
Mr. Shehu Sanusi	NPRA15477	Member	11 May 2023	
Dr. Peter Kwesi Terkper	NPRA24010	Member	19 February, 2024	
Mrs. Belinda Fokuo	NPRA24011	Member	19 February, 2024	
Dr. Frank Mawuyome Gamadey	NPRA15435	Independent Trustee	29 <sup>th</sup> October, 2024	

### Statutory requirements

The Trustees have complied with the requirements of the National Pensions Act, 2008 (Act 766) as amended, Occupational and Personal Pension Schemes (General) Regulations 2011 (L.I.1990), Guidelines and Board Directives that have been issued.

### Auditor

The Scheme's auditor, PricewaterhouseCoopers, have expressed their willingness to continue in office as auditor of the Scheme.

### On behalf of the board of trustees

Name of Independent Trustee: Dr. Frank Gamadey

Signature:



Name of Trustee: Araba Asumanu

Signature:



29<sup>th</sup> April 2025

## **Enterprise Tier 3 Provident Fund Scheme**

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### **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 Enterprise Tier 3 Provident Fund Scheme.

#### **For the Trustees:**

Name of Independent Trustee: Dr. Frank Gamadey

Signature:



Name of Trustee: Araba Asumanu

Signature:



29<sup>th</sup> April 2025

# **INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF ENTERPRISE TIER 3 PROVIDENT FUND SCHEME**

## **REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS**

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### **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 (the "Scheme") as at 31 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 31 December 2024.

The financial statements comprise:

- the statement of net assets available for benefits as at 31 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.

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### **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.

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### **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.

**INDEPENDENT AUDITOR'S REPORT  
TO THE MEMBERS OF ENTERPRISE TIER 3 PROVIDENT FUND SCHEME (continued)**

**Key audit matters (continued)**

Key audit matter	How our audit addressed the key audit matter									
<p><b>Derecognition loss on investment in debt securities</b></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><b>Gross amount</b></td><td><b>Derecognition loss</b></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>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>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>A derecognition loss GH¢11,031,000 was recognised as a result of the exchange of eligible bonds.</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 determination of the discount rate was an area of significant judgement.</p> <p>The accounting policies, critical estimates and judgements and impairment charge are set out in notes 2g, 3, 5, 17 to the financial statements.</p>		<b>Gross amount</b>	<b>Derecognition loss</b>		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 Scheme based on the approval of the Board.</p> <p>We assessed the reasonableness of the discount rate used for determining the present value of cash flows expected from new bonds by:</p> <ul style="list-style-type: none"><li>• reviewing the methodology adopted in determining the discount rate;</li><li>• agreeing the inputs used in the calculation of the market prices; and</li><li>• reviewing the accuracy of the computation of the discount rate.</li></ul> <p>We assessed the appropriateness of the related disclosures in the financial statements in accordance with IFRS 9.</p>
	<b>Gross amount</b>	<b>Derecognition loss</b>								
	GH¢'000	GH¢'000								
Investment securities-Eurobond	22,224	11,031								

## **INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF ENTERPRISE TIER 3 PROVIDENT FUND SCHEME (continued)**

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### **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.

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### **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.

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### **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 misstatements, 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.

**INDEPENDENT AUDITOR'S REPORT  
TO THE MEMBERS OF ENTERPRISE TIER 3 PROVIDENT FUND SCHEME (continued)**

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**Auditor's responsibilities for the audit of the financial statements (continued)**

- 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.
- 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.

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  
TO THE MEMBERS OF ENTERPRISE TIER 3 PROVIDENT FUND SCHEME (continued)**

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**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.

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



**PricewaterhouseCoopers (ICAG/F/2025/028)**  
**Chartered Accountants**  
**Accra, Ghana**  
**30 April 2025**





**Enterprise Tier 3 Provident Fund Scheme**

Financial statements


for the year ended 31 December 2024


**STATEMENT OF NET ASSETS AVAILABLE FOR BENEFITS**

(All amounts are in thousands of Ghana cedis)

	Note	At 31 December	
		2024	2023
<b>Assets</b>			
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	<u>126,438</u>	<u>66,795</u>
		<b><u>1,617,702</u></b>	<b><u>1,204,583</u></b>
<b>Liabilities</b>			
Benefits payable	8	4,757	1,680
Administrative expenses payable	9	2,758	2,240
Other payables	10	<u>7,383</u>	<u>7,043</u>
		<b><u>14,898</u></b>	<b><u>10,963</u></b>
<b>Total assets less liabilities</b>		<b><u>1,602,804</u></b>	<b><u>1,193,620</u></b>
Represented by:			
<b>Net assets available for benefits</b>		<b><u>1,602,804</u></b>	<b><u>1,193,620</u></b>

The financial statements on pages 15 to 36 were approved for issue by the Trustees on 29<sup>th</sup> April 2025 and were signed on their behalf by:

  
Dr. Frank Gamadey  
Independent Trustee

  
.....  
Araba Asumanu  
Trustee

The notes on pages 19 to 36 form an integral part of the financial statements.

**Enterprise Tier 3 Provident Fund Scheme**  
**Financial statements**  
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**STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS**  
(All amounts are in thousands of Ghana cedis)

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

The notes on pages 19 to 36 form an integral part of the financial statements.

**Enterprise Tier 3 Provident Fund Scheme**  
**Financial statements**  
**for the year ended 31 December 2024**

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**STATEMENT OF MOVEMENT IN NET ASSETS AVAILABLE FOR BENEFITS**  
 (All amounts are in thousands of Ghana cedis)

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

The notes on pages 19 to 36 form an integral part of the financial statements.

**Enterprise Tier 3 Provident Fund Scheme**  
**Financial statements**  
**for the year ended 31 December 2024**

**STATEMENT OF CASH FLOWS**

(All amounts are in thousands of Ghana cedis)

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

The notes on pages 19 to 36 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 open to companies and their employees.

As at the date of reporting, the number of participating companies and employees of the Enterprise Tier 3 Provident Fund Scheme is 465 and 46,133 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 International Financial Reporting Standards (IFRS), with the IAS 29 Hyperinflation 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, with the IAS 29 Hyperinflation directive issued by the Institute of Chartered Accountants, Ghana (ICAG) requires the use of certain critical accounting estimates. It also requires the 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**

### **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 1 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 and interpretations have been published that are not mandatory for 31 December 2024 reporting periods and have not been early adopted by the Scheme. These standards are not expected to have a material impact on the scheme 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 (continued)**

**(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 significant accounting policies (continued)**

**(g) Financial assets and liabilities (continued)**

***Classification and subsequent measurement (continued)***

**Financial assets (continued)**

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.

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).



**NOTES (continued)**

**2. Summary of significant accounting policies (continued)**

**(g) Financial assets and liabilities (continued)**

***Classification and subsequent measurement (continued)***

**Financial assets (continued)**

***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.

**Fair value measurement**

The determination of fair values of financial assets and financial liabilities is based on quoted market prices or dealer price quotations for financial instruments traded in active markets. For all other financial instruments fair value is determined using valuation techniques.

**Write-offs**

The Scheme writes off financial assets as bad debt when the following have occurred; either upon liquidation, or 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.

**NOTES (continued)**

**2. Summary of significant accounting policies (continued)**

**(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 and derecogn*

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). 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.

The Scheme considers evidence of restructuring of investment securities at both an individual asset and a collective level. All individually significant assets are individually assessed for modification or derecognition gain or loss. In assessing for modification or derecognition gain or loss on investment securities that are within the scope of the Government of Ghana's Domestic Debt Exchange Programme and Eurobond Exchange Programme, modification or derecognition gain or loss is calculated as the difference between carrying value of the old investments and the fair value of new investments calculated as the present value of future cash flows using an appropriate discount rate. A range of valuation assumptions to arrive at a proxy for an appropriate discount rate due to the current complexities in Eurobond's bond market.

**Enterprise Tier 3 Provident Fund Scheme**

Financial statements

for the year ended 31 December 2024

**NOTES (continued)**

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

**4. Cash and cash equivalents**

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

**5. Financial assets at amortised cost**

<u>Year ended 31 December 2024</u>	Government securities	Fixed deposits	Corporate debt	Total
<i>Gross financial assets:</i>				
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	<u>81,116</u>	<u>2,331</u>	<u>3,837</u>	<u>87,284</u>
At end of year	<u>1,175,125</u>	<u>136,331</u>	<u>50,873</u>	<u>1,362,329</u>
<i>Impairment provision:</i>				
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>				Total
<i>Gross financial assets:</i>				
At start of year	906,030	-	72,998	979,028
Settlement on exchange/additions	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	<u>83,294</u>	<u>46</u>	<u>119</u>	<u>83,459</u>
At end of year	<u>1,114,380</u>	<u>7,547</u>	<u>3,249</u>	<u>1,125,176</u>
<i>Impairment provision:</i>				
At start of year	(55,299)	-	(4,427)	(59,726)
(Charge)/release 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>

**Enterprise Tier 3 Provident Fund Scheme**

Financial statements

for the year ended 31 December 2024

**NOTES (continued)**

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

**6. Financial instruments 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>55,483</u>	<u>57,722</u>	<u>113,205</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>16,030</u>	<u>635</u>	<u>16,665</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	<u>7</u>	<u>3</u>
	<u>55,483</u>	<u>16,030</u>

**Enterprise Tier 3 Provident Fund Scheme**

Financial statements

for the year ended 31 December 2024

**NOTES (continued)**

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

**6. Financial instruments at fair value through profit or loss (continued)**

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**

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

**8. Benefits payable**

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**

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	<u>53</u>	<u>45</u>
Total administrative expenses payable	<u>2,758</u>	<u>2,240</u>

**Enterprise Tier 3 Provident Fund Scheme**  
Financial statements  
for the year ended 31 December 2024

**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	<u>7,235</u>	<u>7030</u>
	<u>7,383</u>	<u>7,043</u>

**11. Contributions**

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

**12. Benefits**

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

**13. Investment income**

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)	<u>10,365</u>	<u>7,316</u>
	<u>260,503</u>	<u>388,220</u>

**14. Gain on investment securities at fair value through profit or loss**

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

**Enterprise Tier 3 Provident Fund Scheme**  
Financial statements  
for the year ended 31 December 2024

**NOTES (continued)**

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

**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>

**16. Net assets available for benefits**

<u>Year ended 31 December 2024</u>	Cumulative Contribution	Cumulative Net Investment Income and expenses	Total
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>
<u>Year ended 31 December 2023</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>

**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.

**NOTES (continued)**

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

**17. Financial risk management, objectives and policies (continued)**

**Risk management framework (continued)**

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.

**Credit risk**

An Investment Asset Allocation Policy which is aimed at ensuring that the Trustees position 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.

For financial assets for which the Scheme has no reasonable expectations of recovering either the entire outstanding amount, or a proportion thereof, the gross carrying amount of the financial asset is reduced. This is considered a (partial) derecognition of the financial asset.

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.



**NOTES (continued)**

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

**17. Financial risk management, objectives and policies (continued)**

**Risk management framework (continued)**

**Credit risk (continued)**

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.

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

On 31 July 2023, the Government of Ghana announced the 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 bills 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>

*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.

## Enterprise Tier 3 Provident Fund Scheme

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### NOTES (continued)

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

#### 17. Financial risk management, objectives and policies (continued)

##### Credit risk (continued)

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 USD1.6 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 USD2,312,695 of the old Eurobonds was exchanged with four new Eurobonds with total face value of USD1,456,998 after suffering haircut.

##### 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>

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**NOTES (continued)**

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

**17. Financial risk management, objectives and policies (continued)**

**Credit risk (continued)**

**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>

**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	<u>280,435</u>	<u>50,873</u>	<u>1,152,900</u>	<u>22,224</u>	<u>1,506,432</u>
Loss allowance	(194)	(1,742)	-	-	(1,936)
<b>Carrying amount</b>	<b>280,241</b>	<b>49,131</b>	<b>1,152,900</b>	<b>22,224</b>	<b>1,504,496</b>

**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	<u>78,781</u>	<u>104,145</u>	<u>1,013,484</u>	<u>-</u>	<u>1,196,411</u>
Loss allowance	(28)	(2,000)	(6,465)	-	(8,493)
<b>Carrying amount</b>	<b>78,754</b>	<b>102,145</b>	<b>1,007,019</b>	<b>-</b>	<b>1,187,918</b>

**NOTES (continued)**

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

**17. Financial risk management, objectives and policies (continued)**

**Liquidity risk**

Liquidity risk is the risk associated with a situation where a 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.

**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 GHS1,281,000 higher/lower (2023: GHS 236,316).

**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 1,613,539,000 (2023: 1,143,402,495) arising substantially from the change in market values of debt securities.

**18. Tax status of the Scheme**

The Enterprise Tier 3 Provident Fund 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.

## Enterprise Tier 3 Provident Fund Scheme

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### NOTES (continued)

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

#### 19. 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.

**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:

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

No financial assets are measured at level 3 in the fair value hierarchy as at 31 December 2024 (2023: Nil).

#### 20. 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.

#### 21. Commitments and contingencies

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

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**NOTES (continued)**

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**22. Events after the reporting period**

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