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**POLICYHOLDERS' COMPENSATION FUND**

**Annual Report  
and Accounts**

**For 12 Months Ended 30th June 2007**

# Contents

**PHCF**
**POLICYHOLDERS' COMPENSATION FUND**
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## **Corporate Information**

### **Board of Trustees**

1. Prof. Chege Waruingi - Chairman
2. Bill Inamdar
3. Charles Mwaura
4. Andrew Greenwood
5. Ann Rama
6. Geoffrey Njenga
7. Commissioner of Insurance

### **Managing Trustee and Board Secretary**

Retirement Benefits Authority

Rahimtulla Tower, 13th Floor, Upper Hill Road

P.O.Box 57733-00200

Nairobi

### **Registered Office**

Bima House, 11th Floor

Harambee Avenue

P.O.Box 43505-00100

Nairobi

### **Bankers**

Kenya Commercial Bank Ltd

University Way Branch

P.O. Box 7206-00300

Nairobi

Commercial Bank of Africa Ltd

Standard/Wabera Streets

P.O.Box 30457-00100

Nairobi

## Policyholders' Compensation Fund Report & Accounts

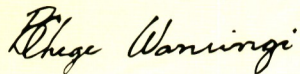
Date 21st May 2007

The Honourable  
Minister for Finance

Dear Sir,

I am pleased to submit this report which covers the 12 months of the Policyholders' Compensation Fund operations, from 1st July 2006 to 30th June 2007.

Yours faithfully,



**Prof. Chege Waruingi**

**Chairman, Board of Trustees  
Policyholders Compensation Fund**

## Composition of the Board of Trustees



**Prof. Chege Waruingi** (*Chairman*)

Holds a doctoral degree in Business Administration (Marketing) from Indiana University, USA. Has over 30 years of University level teaching and administration experience in the USA and Kenya. He is currently the Vice Chancellor of Greta University, Thika, a director of Magadi Soda Company and Chairman of the Capital Markets Authority.



**David B. Nyakundi** (*Representative of Managing Trustee*)

An advocate of the High Court of Kenya and holds a masters degree in Law from the University of Nairobi. He is currently the Head of Compliance, Retirement Benefits Authority. He has considerable knowledge in the law relating to pensions and old age income security. He represents the Retirement Benefits Authority which is the Managing Trustee of the Fund.



**Sammy Makove** (*Commissioner of Insurance*)

Holds a BCom degree in Insurance from the University of Nairobi and an ACII. Has worked in the Insurance Department since 1987 having previously worked at Phoenix East Africa Insurance Company.



**Andrew Greenwood** (*Trustee*)

Chief Executive, Pan Africa Insurance Group and is a Chartered Accountant (SA) and (Aus). He is the Chairman of AKI life Insurance Council, Deputy Chairman AKI Board.

**Geoffrey Njenga** *(Trustee)*

The Chief Executive/Principal Officer of Intra Africa Assurance Company with vast experience in the Insurance Industry spanning over 21 years. He is the Vice Chairman of the Association of Kenya Insurers and Chairman of the General insurance Council (AKI) and the Convener of the Ethics and Self Regulation Committee of Association of Kenya Insurers.

**I.T. Inamdar** *(Trustee)*

An advocate of the High Court of Kenya and the Senior Partner in the firm of Inamdar & Inamdar Advocates of Nairobi and Mombasa. He is one of the leading Commercial Litigation lawyers in this country and has considerable specialist knowledge in the field of Insurance Law and Practice.

**Charles Njonjo Mwaura** *(Trustee)*

The Chief Executive, Range Hawk Loss Adjusters & Risk Assessors (K) Limited. A loss Adjuster and Risk Manager by profession holds a Masters degree in Business Administration (Insurance and Risk Management), FCII, AClarb. AILA, FIIK CIP. Also the Chairman, Institute of Loss Adjusters & Risk Surveyors (Kenya)

**Ann Ngiana Rama** *(Trustee)*

The Managing Director of Assured Insurance Brokers. A trustee of the College of Insurance and an executive Member of AIBK.



## Board of Trustees Report

### Establishment

The Policyholders' Compensation Fund was established under Section 179 of the Insurance Act by the Government of Kenya on 24th September 2004, through the Legal Notice No. 105. The operations of the Fund commenced on January 1, 2005 and are governed by the terms of that Legal Notice.

### Purpose

The purpose of the Fund is to provide compensation to policyholders in the event of an insurer becoming insolvent. The fund operates on similar features as those of Deposit Protection Fund.

### Funding

The insurance policyholders, who are the beneficiaries of the Fund contribute 0.25% of the premiums payable monthly. The insurance companies also contribute 0.25% of the premiums receivable monthly, resulting in a total of 0.5% contributions from insurance companies payable within 15 days after end of the month to which they relate. The Government has committed itself by way of financial support.

### Management

The Fund is run by a Board of Trustees, which is accountable to the Government through the Ministry of Finance. The trustees who held office during the period under review are shown on page 1. The Retirement Benefits Authority (RBA) are the Managing Trustee.

### Financial Performance

During the year under review, the Fund received contributions from insurers totalling Kshs. 164,584,133 compared to Kshs 190,289,144 received in the previous 18 months, which was the first financial year. The contributions which are a statutory levy, is invested in short term Government securities.

During the same period, investment income of Kshs. 17,661,998 (previous year Kshs 5,358,594) was generated. Investment diversification would be considered once the Fund's Investment Policy has been approved by the Government. The Government provided a grant of Kshs 20 million compared to Ksh 15 million the previous year.

During the financial year, the net assets of the Fund grew from Kshs 200,471,890 to Ksh 393,026,685 an increase of 96%. This performance is a reflection of both non-commencement of claim settlements and prudent management of operational expenses.

### Financial statistics

	<b>2005/6</b>	<b>2006/7</b>	<b>Cummulative</b>
	<b>18 months</b>	<b>12 months</b>	<b>Total</b>
	<b>Kshs</b>	<b>Kshs</b>	<b>Kshs</b>
Levy contributions	190,289,144	164,584,133	354,873,277
Government grant	15,000,000	20,000,000	35,000,000
Net assets	200,471,890	393,026,685	393,026,685

## Board of Trustees Report cont'd.

### Operational considerations

During the year under review, the Board of Trustees addressed the following major operational issues:

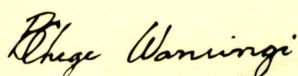
1. The Board considered the need and procured the services of an actuary to carry out an actuarial valuation of the Fund to determine the possible liability of the Fund to enable the Trustees establish a policy on the Fund's liability in line with Regulation 12 and 13 of Legal Notice No.105/2004.
2. The Board considered the procurement of an appropriate computer software. Demonstrations for accounting software have been carried out and evaluation process is underway.
3. The Board considered the need and procured the services of a legal consultant to review and advise on the legislative and procedural framework required for the establishment and proper functioning of the Fund.
4. Claims process consultancy services were considered by the Board and appropriate details are being worked out.
5. The Board sent out letters to relevant institutions in the UK and Canada dealing with policyholders compensation fund seeking their permission to visit them for purposes of learning from them. Responses are being awaited.

### Future Operations

The Board has submitted to Treasury a comprehensive Budget Estimate for the financial year 2007/2008. The budget estimate provides a detailed structure that reflects the Fund's preparedness for anticipated claims.

### Trustees' Responsibilities

The Trustees are responsible for the preparation of the financial statements which give a true and fair view of the state of affairs of the Fund as at the end of the financial year and of its operating results for the period under review. It is also the Trustees' responsibility to maintain proper books of account and safeguard the assets of the Fund.



**Prof. Chege Waruingi**  
Chairman

**Dated: 18th November 2007**



## A Word from the Chairman



**Prof. Chege Waruingi**  
Chairman

I make this year's report with satisfaction in view of some progress the Fund has made on a number of fronts. The Fund remains committed to its long term vision of ensuring that policyholders are compensated in the event of an insurer going under.

The principal role of the Fund is to ensure that there is enough funding by insurers and policyholders to create a pool of funds to take care of any incidence of insolvency of an insurer in the market. As such, the Fund has during the past year ensured that all insurers have remitted their contributions to the Fund as required by law.

### **BOARD INITIATIVES**

During the period under review the Board of Trustees managed to undertake some activities intended to improve the services of the Fund. Some of those activities include:

#### **1. Review of the Legislative and Procedural Framework for the establishment and functioning of the Fund**

The Board of trustees engaged a legal consultant to study the current provisions of the Insurance Act and Legal Notice No. 105 of 2004 under which the Fund was set up to in order to establish possible ways of effective and expeditious payment of compensation to policyholders of an insolvent insurer.

This was necessitated by the fact that under current legislative provisions, insurers undergoing financial stress may have to undergo long periods of statutory management pursuant to the provisions of the Insurance Act before liquidation is ordered by the court under the Companies Act.

During the period of statutory management and eventual completion of liquidation, policyholders may not be able to receive compensation from the Fund and thereby negating the very essence of the prompt compensation intended by setting up the Fund.

The study findings will form a basis of some policy considerations which will be presented to the Treasury in due course.

In the meantime, the Fund has drafted a new set of Regulations under the Insurance Act intended to improve the operations of the Fund. The draft

**Chairman's Report cont'd.**

regulations have been submitted to the Commissioner of Insurance for study and further submission to the Treasury.

**2. Treatment of Long term and Life Insurance Business**

The Board of Trustees deliberated on whether long term and life insurance business should be covered by the compensation scheme established by Legal Notice No. 105 of 2004. The Fund during the year consulted with an actuary to advice on how to treat the matter. The report of the actuary shows that there are classes of long term insurance business which should be covered by the Fund. Under the Insurance Act, statutory life funds are legally protected even if an insurer goes under. It would appear therefore that there would be no need to provide for compensation to life insurance policyholders because the assets and liabilities of a statutory fund are protected and separate capable of being sold to another insurer to hold them as custodian for the benefit of policyholders. Once the Fund concludes a study of this issue, a final report will be developed and recommendations made to the Government.

**3. Appropriate Funding and Compensation levels**

The board of trustees has examined the issue of whether the current contribution and compensation levels are appropriate. It found out that the current contribution and compensation levels were not based on any empirical study of the industry to enable informed rationale basis for the current levels. Accordingly the Fund has resolved to carry out a study whose findings will form the basis of amendments to the current provisions in the Insurance Act.

**CHALLENGES FACING THE FUND**

The Fund still does not have its own staff that could put more time in developing the institution,

its systems and help the Board in implementing policy. In particular, the Fund needs to have its own Managing Trustee for purposes of running the institution. The current Managing Trustee which is Retirement Benefits Authority has enough in its mandate of supervising the retirement benefits sector. Currently, there is only one technical officer who is fully seconded to the Fund by the Retirement Benefits Authority. The current legal framework does not permit the board of trustees to hire its own staff. The statutory provisions require that the Commissioner of Insurance seconds to the Fund all required staff. This has not been possible because of constraints of technical staff at the department of insurance.

The Fund is a body corporate and requires categorization by the State Corporations Advisory Committee to enable efficient discharge of its duties as a state corporation. A request for categorization has been made to relevant government departments.

**CONCLUSION**

As the financial statements indicate, the Fund is steadily growing. Although the Fund has not been able to fully put in place an operational institutional framework owing to statutory limitations, it is expected that during the next financial year, some progress towards that end will be made. It is expected that with the establishment of the Insurance Regulatory Authority, supervision of the insurance sector will be enhanced and cases of insolvency of insurers will diminish and thereby reduce the cost of providing for compensation of policyholders.



**Prof. Chege Waruingi**  
Chairman

## Message from the Managing Trustee



**David B Nyakundi**

*(Representative of Managing Trustee)*

As a representative of the Managing Trustee/ I am pleased to make this brief statement on the performance of the Fund during the last financial year.

### **LEVY CONTRIBUTION**

Contributions from insurers and policyholders for the 12 months ended 30th June, 2007 was Kshs. 164,583,933 compared to Kshs. 135,019,639 for 12 months to 30th June, 2006. The contributions represent an increase of Kshs. 29,564,294 or 22%. In view of the fact that the number of insurers had reduced by one to 43 from 44 in the previous review period, the increase may be attributable to increased compliance of insurance companies and an increase in the number of policyholders. It is expected that contributions will continue to grow as more people purchase insurance policies.

### **INVESTMENT OF FUNDS**

The Fund has continued to invest its assets in government securities in accordance with government policy. Investment income increased from Kshs. 5,358,595 during the 18 months to 30th June, 2006 to Kshs. 17,661,998 for 12 months to 30th June 2007. In the year under review, there were more funds to invest and all investments were in government securities. However, in the previous period, there was lower volume of funds for investment and most of the funds were invested in low yielding bank savings. Until the government policy changes on investments of parastatal assets, the Fund will continue to invest in government securities.

### **ADMINISTRATIVE EXPENSES**

Despite having many activities during the year/ the Board of trustees managed to contain administrative expenses at a level of Kshs. 9,569,006 down from Kshs. 10,175,848 during the previous period. The board of trustees has endeavored to limit the administrative cost below 10% of the contributions.

**CONCLUSION**

The Fund endeavors to remain prudent at all times in the management of its assets and remains focused at its mandate to build a pool of funds sufficient to cushion policyholders against risks of failure of insurers. The Fund will continue to improve its instructional framework and it is expected that in the next few years, it will have its own staff that will advance its objectives as envisaged in the statutory provisions under which it is established.



**Representative of Managing Trustee**

## **Statement of Trustees' Responsibility**

The Legal Notice No. 105 of 2004 requires the Trustees to prepare financial statements for each year which give a true and fair view of the state of affairs of the Fund as at the end of each financial year and of the operating results of the Fund for that year.

It also requires the Trustees to ensure the Fund keeps proper accounting records, which disclose with reasonable accuracy at any time the financial position of the Fund. They are also responsible for safeguarding the assets of the Fund.

The Trustees accept responsibility for the financial statements, which have been prepared using appropriate accounting policies supported by reasonable and prudent judgements and estimates, in conformity with International Financial Reporting Standards.

The Trustees are of the opinion that the financial statements give a true and fair view of the financial affairs of the Fund and its operating results. The Trustees further accept responsibility for the maintenance of accounting records which may be relied upon in the preparation of the financial statements as well as adequate systems of internal financial control.

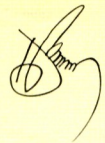
Nothing has come to the attention of the Trustees to indicate that the Fund will not remain a going concern for at least the next twelve months from the date of this statement.

For the Trustees

Signed by,



**Prof. Chege Waruingi**  
**Chairman**



**David B. Nyakundi**  
**For: Managing Trustee**

## Financial Statements

### REPORT OF THE CONTROLLER AND AUDITOR GENERAL ON THE FINANCIAL STATEMENTS OF THE POLICY HOLDERS' COMPENSATION FUND FOR THE YEAR ENDED 30 JUNE 2007

I have audited the financial statements of Policy Holders' Compensation Fund for 12 months ended 30 June 2007, the statement of income and expenditure account, statement of changes in equity, and cash flow statement for the year then ended together with a summary of significant accounting policies and other explanatory notes in accordance with the provisions of Section 14 of the Public Audit Act, 2003. I have obtained all the information and explanations which, to the best of my knowledge and belief, were necessary for the purpose of the audit.

#### ***The Trustees Responsibility for the Financial Statements***

The Trustees are responsible for the preparation of the financial statements which give a true and fair view of the Fund's state of affairs and its operating results in accordance with the International Financial Reporting Standards. This responsibility includes: designing, implementing and maintaining internal controls relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error; selecting and applying appropriate accounting policies; and making accounting estimates that are reasonable in the circumstances.

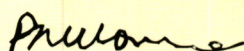
#### ***Responsibility of the Controller and Auditor General***

My responsibility is to express an independent opinion on the financial statements based on the audit. The audit was conducted in accordance with the International Standards on Auditing. Those standards require compliance with ethical requirements and that the audit be planned and performed with a view to obtaining reasonable assurance that the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal controls relevant to the entity's preparation and fair presentation of the financial statements 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 Fund's internal controls. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by the Trustees, as well as evaluating the overall presentation of the financial statements. I believe the audit provides a reasonable basis for my opinion.

#### ***Opinion***

In my opinion, proper books of account have been kept and the accompanying financial statements give a true and fair view of the state of affairs of the Fund as at 30 June, 2007 and of its surplus and cashflows for the year then ended in accordance with the International Financial Reporting Standards and the Insurance Act, Cap 487, of the Laws of Kenya.



**P.N. Komora**

**Controller and Auditor General**

Nairobi

06 December 2007

## Income & Expenditure Account

	Notes	12 months to 30 June 2007 Kshs	18 months to 30 June 2006 Kshs
<b>Contributions and Claims</b>			
Contributions receivable	2	164,584,133	190,289,144
Claims payable		-	-
<b>Net contributions receivable</b>		<b>164,584,133</b>	<b>190,289,144</b>
<b>Treasury allocation</b>	<b>3</b>	<b>20,000,000</b>	<b>15,000,000</b>
<b>Investment income</b>	<b>4</b>	<b>17,661,998</b>	<b>5,358,594</b>
<b>Administrative expenses</b>	<b>5</b>	<b>(9,691,336)</b>	<b>(10,175,848)</b>
<b>Net increase in the fund during the period</b>		<b>192,554,795</b>	<b>200,471,890</b>
Fund balance brought forward		200,471,890	-
<b>Fund balance carried forward</b>		<b>393,026,685</b>	<b>200,471,890</b>

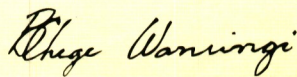
## Statement of Change in Equity

	30 June 2007 Kshs	30 June 2006 Kshs
Fund balance at 1/7/2006	200,471,890	-
Increase in the fund during the year	192,554,795	200,471,890
Fund balance at 30/6/2007	<b>393,026,685</b>	<b>200,471,890</b>

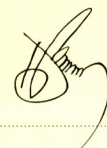
**Balance Sheet**

	Notes	30 June 2007 Kshs	30 June 2006 Kshs
<b>ASSETS</b>			
Fixed assets	6	550,884	609,432
<b>Current Assets</b>			
Contributions outstanding	7	12,407,426	12,713,591
Withholding tax recoverable	8	31,704	-
Treasury bills	9	363,581,764	173,333,951
Savings account	10	1,102,463	13,765,382
Current accounts	11	15,858,699	365,089
Cash on hand		51,197	48,545
		393,033,253	200,226,558
<b>Less: Current Liabilities</b>			
Creditors and accruals	12	(557,452)	(364,100)
Net Current Assets		392,475,801	199,862,458
<b>Total Assets</b>		<b>393,026,685</b>	<b>200,471,890</b>
<b>FINANCED BY</b>			
<b>Fund Balance</b>		<b>393,026,685</b>	<b>200,471,890</b>

The accounts on pages 17 to 19 were approved by the Board of Trustees on 16 August 2007 and signed on its behalf by:



**Prof. Chege Waruingi**  
Chairman



**David B. Nyakundi**  
For: Managing Trustee



## Cashflow Statement

	12 Months 30 June 2007	18 Months to 30 June 2006
	Kshs	Kshs
<b>Cashflow from operations</b>		
Contributions received	164,767,968	177,575,553
Treasury allocation received	20,000,000	15,000,000
Expenditure paid	(9,135,057)	(9,811,748)
<b>Net cashflow from operations</b>	<b>175,632,911</b>	<b>182,763,805</b>
<b>Cashflow to investing activities</b>		
Purchase of Treasury bills	(190,247,813)	(172,293,349)
Purchase of fixed assets	(182,049)	(815,760)
Withholding tax paid	(31,704)	-
Investment income received	17,661,998	4,524,320
	(172,799,568)	(168,584,789)
<b>Net increase in cash and cash equivalents</b>	<b>2,833,343</b>	<b>14,179,016</b>
Opening cash and cash equivalents	14,179,016	-
Closing cash and cash equivalents	17,012,359	14,179,016
<b>Cash and Cash equivalents at the end of the period</b>		
Savings account	1,102,463	13,765,382
Current account	15,858,699	365,089
Cash on hand	51,197	48,545
	<b>17,012,359</b>	<b>14,179,016</b>

## Notes to the Accounts

### 1. Accounting policies

#### (a) Basis of preparation

The financial statements were prepared in accordance with and comply with International Financial Reporting Standards. The accounts were prepared under the historical cost convention.

#### (b) Depreciation

The fixed assets are depreciated on a straight line method. The following rates of the depreciation have been applied:

Computers	33.3%
Office furniture & equipment	12.5%

#### (c) Revenue recognition

Contribution income is accounted for in the period it relates to.

Interest on treasury bills is accounted for in the period it is earned. Interest on savings account is recognized when received. Government grant is recognised when received.

### 2 Contributions Receivable

44 Insurance companies participated in the levy contributions during the year under review. Each insurance company pays 0.5% of monthly premiums as levy contributions. These contributions are payable by 15th day of the following month to which they relate.

### 3 Treasury Allocation

During the year under review, the Fund received Kshs 20million from Treasury to meet operational expenses.

4 Investment Income	2006 Kshs	2007 Kshs
Treasury bills	17,419,397	4,560,318
Savings and current accounts	242,601	798,276
	<b>17,661,998</b>	<b>5,358,594</b>

5 Administrative expenses	18 months to 30 June 2006 Kshs	18 months to 30 June 2006 Kshs
Board expenses	3,253,041	5,887,275
Managing Trustee	2,103,258	982,896
Staff emoluments	578,291	257,145
Insurance expense	13,064	-
Parking expenses	8,330	3,770
Computer maintenance	35,456	45,163
Official entertainment	7,660	-
Travelling expenses	266,000	212,000
General office expenses	52,758	112,607
Printing & stationery	406,382	112,015
Public education & publicity	-	75,098
Training & development	141,000	1,026,259
Library expenses	30,440	14,155
Telephone & postage	154,346	380,956
Professional fees	2,092,200	442,200
Audit fees	150,000	150,000
Bank charges	36,183	10,640
Depreciation	240,597	206,328
Partitioning & repairs	-	257,341
Contribution outstanding written off (Note 7)	122,330	-
	<b>9,691,336</b>	<b>10,175,848</b>

## Notes to the Accounts contd.

### 6 Fixed Assets

	<b>Computer furniture &amp; equipment 33.3%</b>	<b>Office</b>	<b>Total</b>
	<b>Kshs.</b>	<b>Kshs.</b>	<b>Kshs.</b>
Cost			
At January 2006			
Additions	177,099	4,950	182,049
At 30 June 2007	680,232	317,577	997,809
Depreciation			
At 1 July 2006	167,544	38,784	206,328
Charge for the year	201,363	39,234	240,597
At 30 June 2007	368,907	78,018	446,925
Net Book Value			
At 30 June 2007	311,325	239,559	550,884
At 30 June 2006	335,589	273,843	609,432

### 7 Contributions Outstanding

	<b>2007</b>	<b>2006</b>
	<b>Kshs</b>	<b>Kshs</b>
From insurance companies	12,407,426	12,591,261
From Treasury (United Insurance)	-	122,330
	12,407,426	12,713,591

April 2005 contribution from United Insurance Co. Ltd had been remitted directly to Treasury. After several attempts to recover, the Board considered that Treasury was unlikely to refund the amount. The amount was written off during the year.

### 8 Withholding tax recoverable

31,704	-
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This was deducted from interest in Savings account with KCB. The Fund's income is tax exempt.

### 9 Treasury Bills

Treasury Bills stated at cost plus accrued interest.

### 10 Savings account

The account is with Kenya Commercial Bank Ltd, University Way Branch. It acts as a collection account.

### 11 Current accounts

	<b>2007</b>	<b>2006</b>
Kenya Commercial Bank Ltd	8,473	365,089
Commercial Bank of Africa Ltd		
Operational account	631,883	-
Collection account	15,218,343	-
	15,858,699	365,089

The accounts at Commercial Bank of Africa Ltd, Standard/Wabera Street were opened during the financial year.

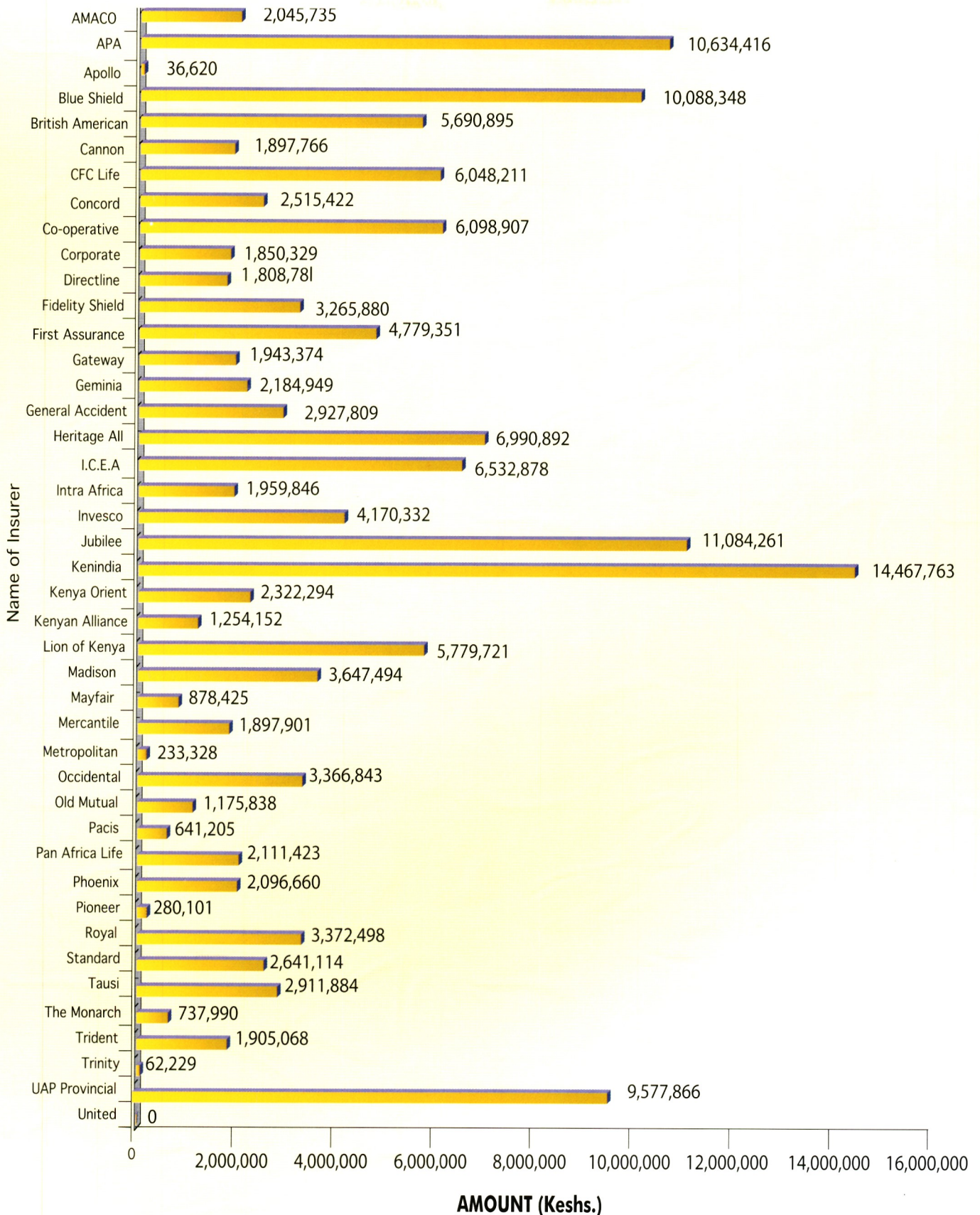
### 12 Creditors and accruals

	<b>2007</b>	<b>2006</b>
Due to college of Insurance	54,790	-
Professional fees	208,800	92,800
Audit fees	150,000	150,000
Training and Development, Lake Naivasha	-	121,300
Managing Trustee	122,862	-
Board expenses	21,000	-
	557,452	364,100

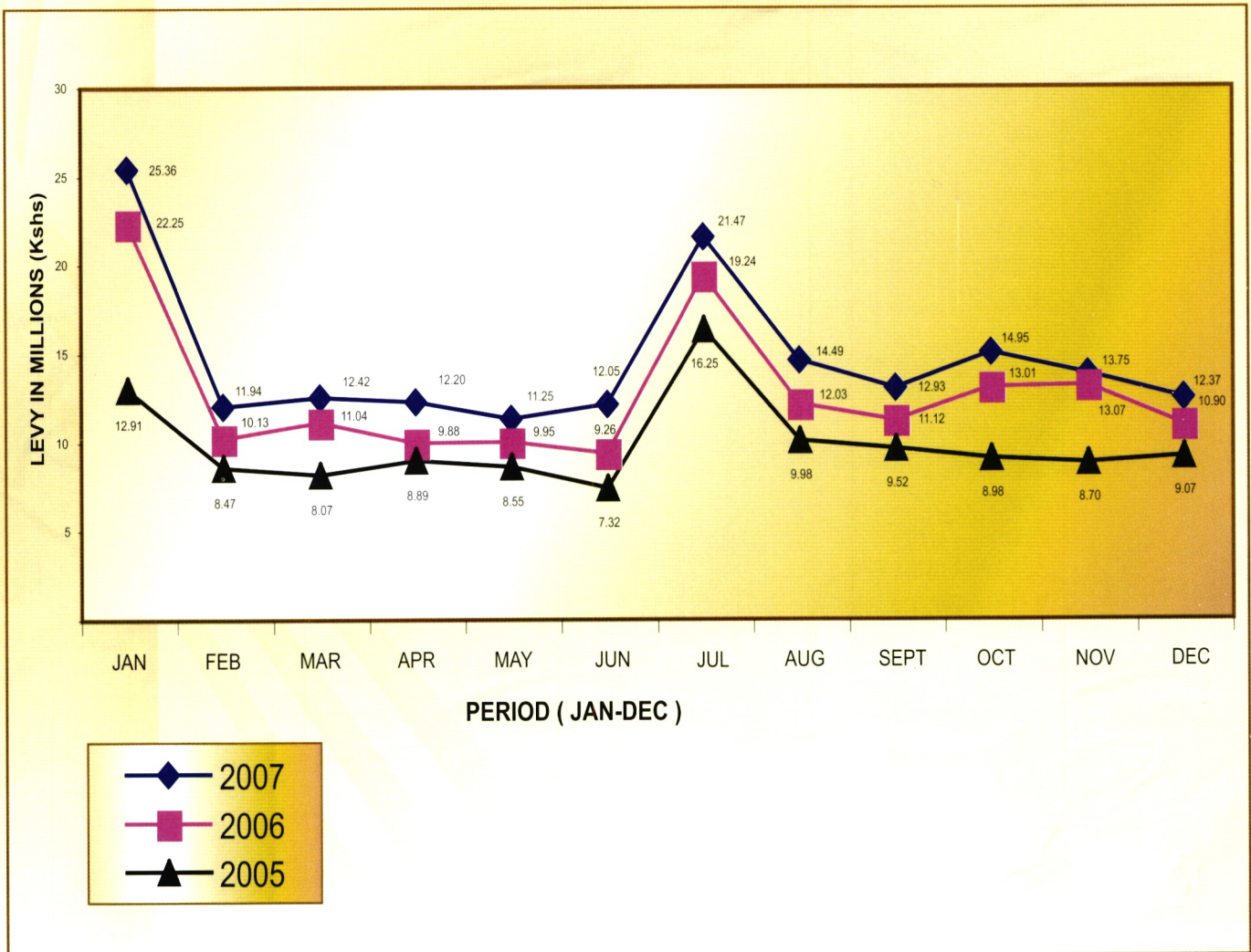
### 13 Currency

The financial statements are presented in Kenya Shillings (Kshs)

## PHCF Levy Payment



## Comparative Levy Payments for 3 years ended 31st December 2005, 2006 and 2007





**POLICYHOLDERS' COMPENSATION FUND**

**Registered Office**

Bima House, 11th Floor, Harambee Avenue

P.O. Box 43505-00100

Nairobi