



**Central Bank of Kenya**

# **Credit Officer Survey**

September 30, 2022



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# CENTRAL BANK OF KENYA COMMERCIAL BANKS' CREDIT OFFICER SURVEY FOR THE QUARTER ENDED SEPTEMBER 30, 2022

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## 1.0 COMMERCIAL BANKS' CREDIT OFFICER SURVEY

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### 1.1 BACKGROUND

Credit risk is the single largest factor affecting the soundness of financial institutions and the financial system. This is because lending is the principal business for banks. The ratio of gross loans to total assets increased marginally from 55.9 percent in the quarter ended June 30, 2022, to 56.0 percent in the quarter ended September 30, 2022.

The Central Bank of Kenya (CBK) undertakes a quarterly Credit Officer Survey to identify the potential drivers of credit risk. The survey requires senior credit officers of banks to indicate their banks perception or actual position in the immediate past quarter and the subsequent quarter in terms of demand for credit, credit standards, asset quality, credit recovery efforts, deployment of liquidity and impact of implementing new standards.

### 1.2 SURVEY METHODOLOGY

Senior Credit Officers<sup>1</sup> complete most of the survey and collate inputs from senior officers responsible for the other aspects. For the quarter ended September 30, 2022, 38 operating commercial banks and 1 mortgage finance company participated in the Commercial Banks Credit Officer Survey.

The survey sought to establish the lending behavior in the banking sector in respect to all the eleven economic sectors. Questions were posed on demand for credit, credit standards for approving loans, non-performing loans, credit recovery efforts, implementation of International Financial Reporting Standards (IFRS) 9 on Financial Instruments and IFRS 16 on Leases. The survey questions are generally phrased in terms of changes over the past three months or expected changes over the next three months.

The survey also included questions concerning liquidity in the banks. The banks were required to state their liquidity trend and appetite for the deployment of liquidity towards extension of credit, interbank lending and other forms of investment.

Following the declaration by the World Health Organization of coronavirus (COVID-19) outbreak as a pandemic in March 2020, CBK has continued to assess the impact of the pandemic on the banking sector.

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<sup>1</sup>These are officers involved in most of the credit and liquidity decisions hence are able to provide reasonably accurate and complete responses from their bank's perspective.

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They also collate input on non-credit aspects from their counterparts.

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### 1.3 KENYAN BANKING SECTOR PERFORMANCE

The Kenyan Banking Sector recorded growth in the quarter ended September 30, 2022, compared to the quarter ended June 30, 2022. Some of the sector's performance indicators are as follows: -

- The aggregate balance sheet increased by 2.6 percent to Ksh.6,415.1 billion in September 2022, from Ksh.6,249.7 billion in June 2022.
  - Gross loans increased by 2.9 percent from Ksh.3,492.8 billion in June 2022, to Ksh.3,594.7 billion in September 2022. The increase in gross loans was largely witnessed in the Trade, Personal and Household, and Agriculture sectors. The increase in gross loans was mainly due to increased credit granted for working capital purposes, and loans granted to individual borrowers.
  - Total deposits increased by 0.2 percent from Ksh.4,616.3 billion in June 2022, to Ksh.4,626.0 billion in September 2022.
  - The asset quality, measured by gross non-performing loans to gross loans ratio improved from 14.7 percent in June 2022, to 13.7 percent in September 2022. This was due to a 4.4 percent decrease in gross NPLs and a 2.9 percent increase in gross loans.
  - The capital adequacy ratio increased marginally from 18.8 percent in June 2022, to 19.0 percent in September 2022. The increased capital adequacy ratio was mainly due to higher increase in Total Capital of 3.3 percent as compared to 2.5 percent increase in Total Risk Weighted Assets. The capital adequacy ratio reported in the two periods were above the minimum statutory limit of 14.5 percent.
- Quarterly profit before tax increased by Ksh.4.7 billion from Ksh.62.5 billion in June 2022, to Ksh.67.2 billion in September 2022. The increase in profitability was mainly attributable to a higher increase in quarterly income by Ksh.10.7 billion as compared to the increase in quarterly expenses by Ksh.5.9 billion.
  - Return on Equity (ROE) increased from 26.8 percent in June 2022, to 27.2 percent in September 2022. The increase in ROE was due to increased profit before tax between the two quarters under review.
  - Liquidity in the banking sector decreased marginally from 52.5 percent in June 2022, to 51.5 percent in September 2022. This was well above the minimum statutory ratio of 20 percent.

### 1.4 SUMMARY OF CREDIT OFFICER SURVEY FINDINGS

- **Demand for credit:** In the third quarter of 2022, the perceived demand for credit remained unchanged in eight economic sectors. It increased in three sectors (Manufacturing, Trade, and Personal and Household).
- **Credit Standards<sup>2</sup>:** In the third quarter of 2022, credit standards remained unchanged in all the eleven economic sectors.
- **Non-Performing Loans per sector:** Respondents indicated that the level of NPLs is expected to remain constant in all economic sectors during the next quarter.
- **Credit Recovery Efforts:** For the quarter ended December 31, 2022, banks expect to intensify their credit recovery efforts in eight

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<sup>2</sup>Credit standards are guidelines used by commercial banks in determining whether to extend a loan to an applicant.

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economic sectors and remain constant in three sectors (Mining and Quarrying, Energy and Water, and Financial Services). The intensified recovery efforts are aimed at improving the overall quality of the asset portfolio.

- **International Financial Reporting Standard (IFRS) 9 on Financial Instruments:** Most banks have adopted a tight credit risk appraisal, ensuring that facilities are well secured and that alternative sources of repayment are available.
- **International Financial Reporting Standard (IFRS) 16 on Leases:** During the quarter ended September 30, 2022, 97 percent of the respondents had implemented IFRS 16. In the

same quarter, 95 percent of the respondents had assessed the impact of IFRS 16 on their financial performance and position.

- **Liquidity risk:** During the quarter ended September 2022, 47 percent of the respondents indicated that their liquidity position had improved. Banks intend to deploy the additional liquidity towards lending to the private sector (29 percent), investing in Treasury Bonds (22 percent), investing in Treasury Bills (22 percent), interbank lending (20 percent), invest in other instruments including offshore (4 percent), increase their cash holdings (2 percent), and CBK liquidity management through repos (1 percent).

## 2.0 SURVEY FINDINGS

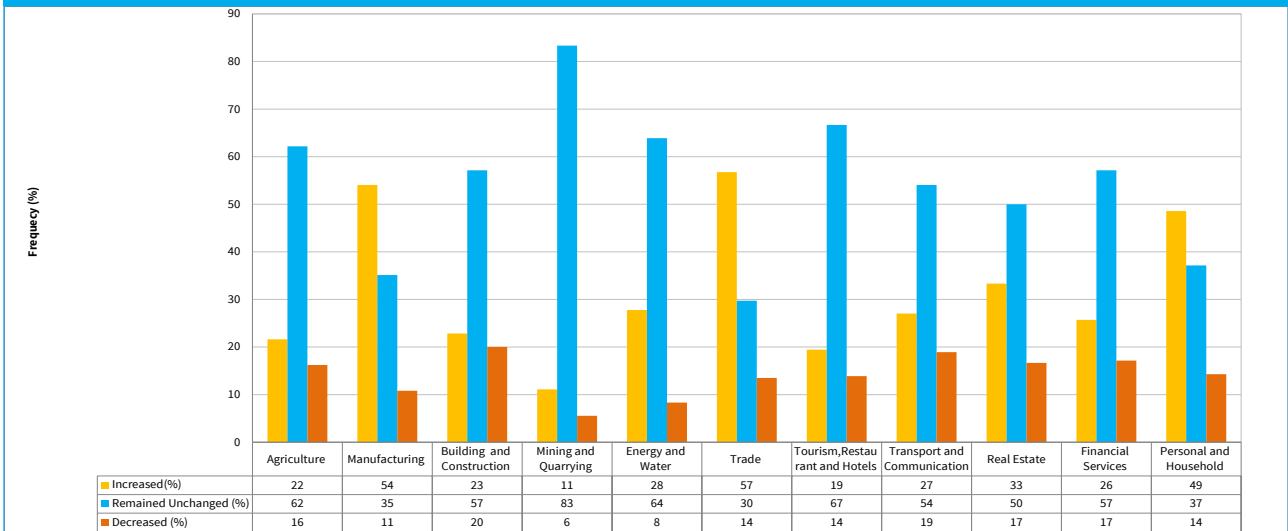
### 2.1 Demand for Credit

- In the third quarter of 2022, the perceived demand for credit remained unchanged in eight economic sectors. It increased in three sectors (Manufacturing, Trade, and Personal and Household).
- The main sectors with unchanged demand for credit are Mining and Quarrying, Tourism, Energy and Water, and Agriculture.
- The perceived increased demand for credit in Manufacturing, Trade, and Personal and Household sectors is attributed to the ongoing return to normalcy of economic activities following the lifting of movement restrictions imposed during the COVID-19 pandemic.
- Chart 1** and **Table 1** below present the trend in the perceived demand for credit in the last two quarters.

**Table 1: Change in Demand for Credit**

Percentage (%)	June 2022			September 2022		
	Increased	Remained Unchanged	Decreased	Increased	Remained Unchanged	Decreased
Agriculture	21	61	18	22	62	16
Manufacturing	42	45	13	54	35	11
Building and Construction	27	54	19	23	57	20
Mining and Quarrying	6	83	11	11	83	6
Energy and Water	19	70	11	28	64	8
Trade	61	34	5	57	30	14
Tourism, Restaurant and Hotels	16	67	17	19	67	14
Transport and Communication	39	47	14	27	54	19
Real Estate	30	54	16	33	50	17
Financial Services	25	72	3	26	57	17
Personal and Household	59	32	9	49	37	14

**Chart 1: Demand for Credit**

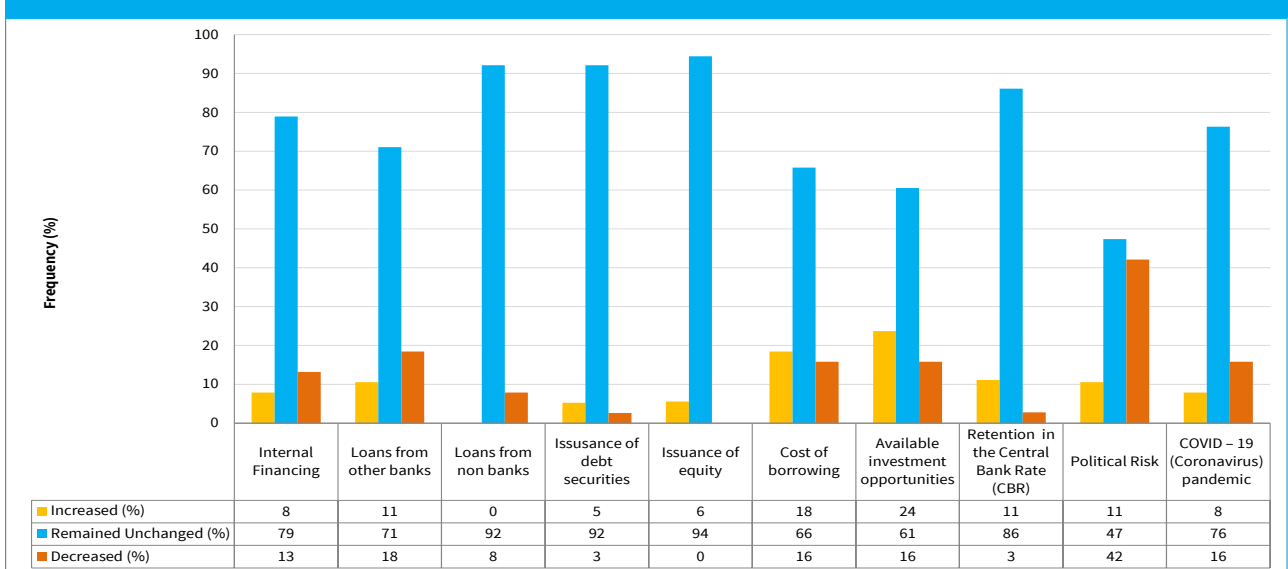


**2.2 Factors Affecting Demand for Credit**

- In the quarter ended September 30, 2022, all the ten factors affecting demand for credit had no significant impact. This is depicted in **Chart 2** and **Table 2**.

- Issuance of equity, issuance of debt securities, and loans from non-banks were cited as having had the least impact on the demand for credit during the quarter under review. These were reported by 94 percent, 92 percent and 92 percent of the respondents respectively.

**Chart 2: Factors affecting Demand for Credit**

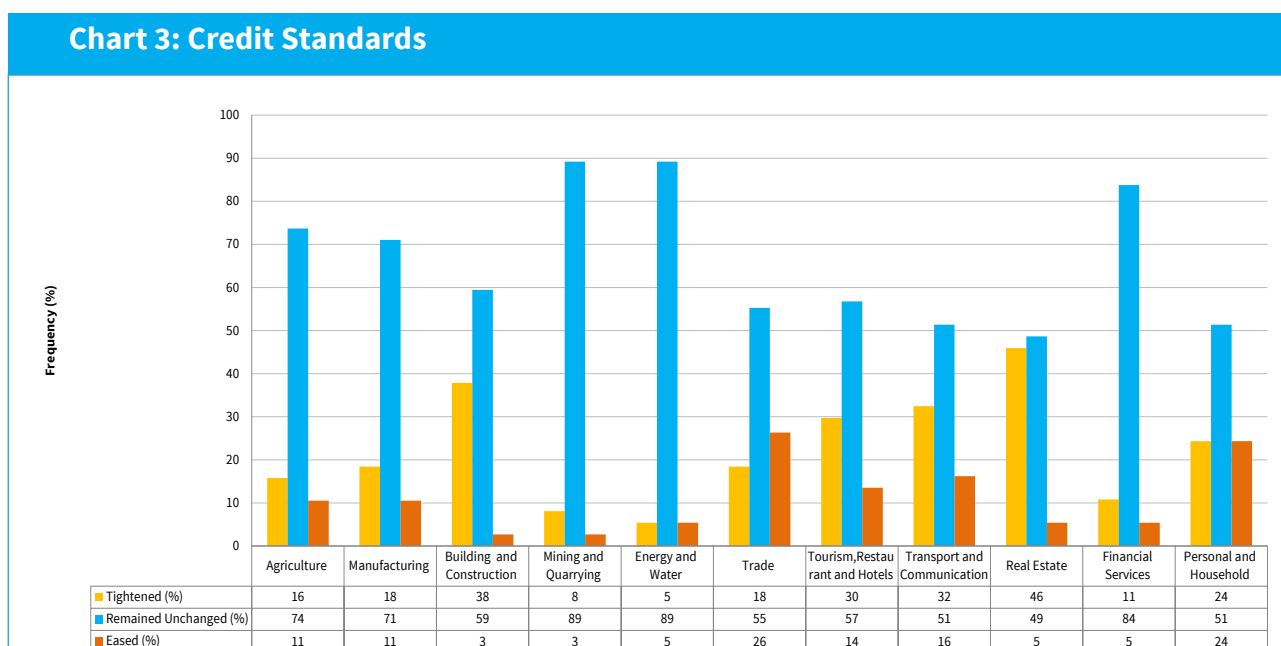


**Table 2: Factors Affecting Demand for Credit**

Percentage (%)	June 2022			September 2022		
	Increased	Remained Unchanged	Decreased	Increased	Remained Unchanged	Decreased
Internal Financing	5	82	13	8	79	13
Loans from other banks	6	79	15	11	71	18
Loans from non-banks	0	92	8	0	92	8
Issuance of debt securities	2	95	3	5	92	3
Issuance of equity	3	97	0	6	94	0
Cost of borrowing	19	73	8	18	66	16
Available investment opportunities	29	63	8	24	61	16
Retention of the Central Bank Rate (CBR)	16	76	8	11	86	3
Political Risk	8	54	38	11	47	42
COVID - 19 pandemic	8	67	25	8	76	16

### 2.3 Credit Standards

- In the third quarter of 2022, credit standards remained unchanged in all the eleven economic sectors.
- This is presented in **Chart 3** and **Table 3** below.



**Table 3: Credit Standards for Loans to Various Economic Sectors**

Percentage (%)	June 2022			September 2022		
	Tightened	Remained Unchanged	Eased	Tightened	Remained Unchanged	Eased
Agriculture	18	77	5	16	74	11
Manufacturing	16	69	15	18	71	11
Building and Construction	32	66	2	38	59	3
Mining and Quarrying	8	89	3	8	89	3
Energy and Water	0	100	0	5	89	5
Trade	10	67	23	18	55	26
Tourism, Restaurant and Hotels	29	66	5	30	57	14
Transport and Communication	21	71	8	32	51	16
Real Estate	39	58	3	46	49	5
Financial Services	0	95	5	11	84	5
Personal and Household	21	53	26	24	51	24

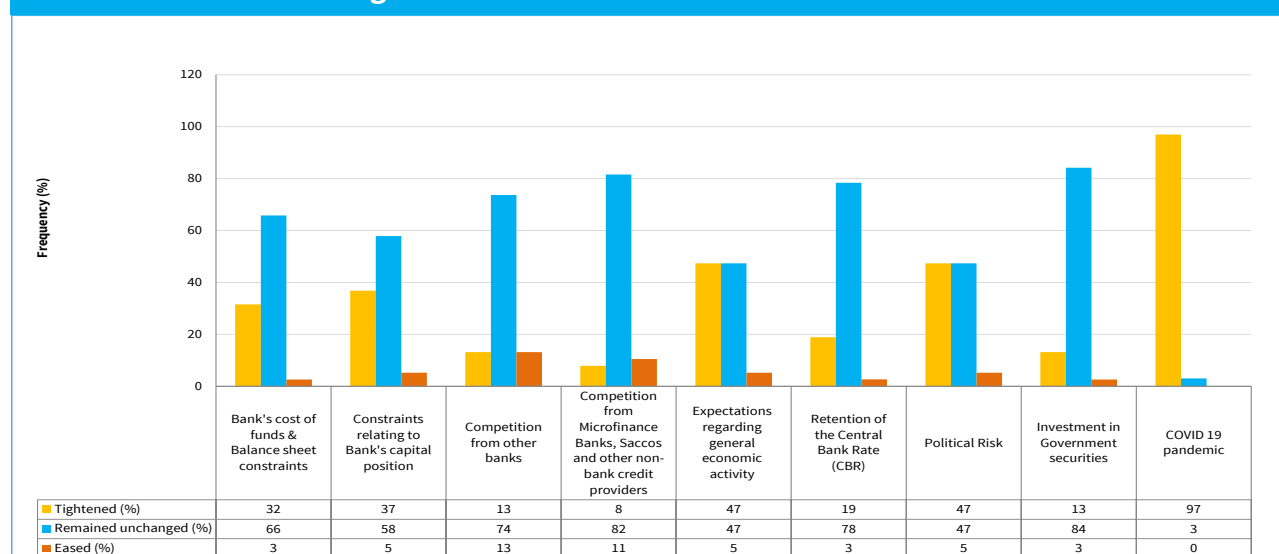
## 2.4 Factors Influencing Credit Standards

- In the quarter ended September 30, 2022, eight factors had little impact on credit standards whereas COVID-19 led to tightening of credit standards.
- Investment in Government Securities, Competition from Saccos, Microfinance banks, and other Credit Providers, and Retention of the Central

Bank Rate are the main factors that had no impact on credit standards. These were reported by 84 percent, 82 percent and 78 percent of the respondents respectively.

- A comparison of the trend in the factors affecting the banks' credit standards are shown in **Chart 4** and **Table 4**.

**Chart 4: Factors affecting Credit Standards**





**Table 4: Factors affecting credit standards**

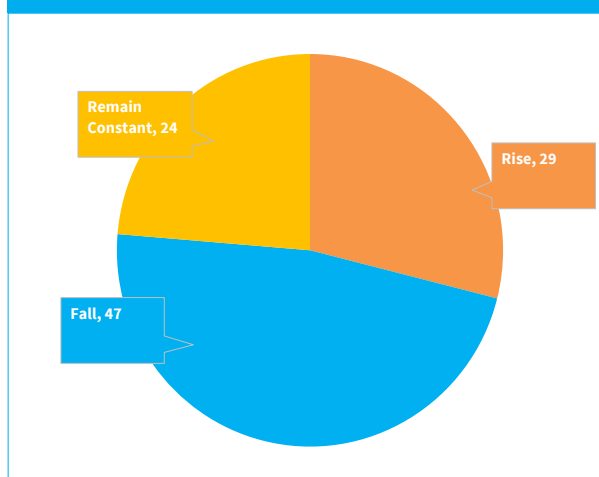
	June 2022			September 2022		
	Tightened	Remained Unchanged	Eased	Tightened	Remained Unchanged	Eased
Bank's cost of funds and Balance sheet constraints	31	64	5	32	66	3
Constraints relating to Bank's capital position	31	64	5	37	58	5
Competition from other banks	5	87	8	13	74	13
Competition from DTMs, Saccos, and other Credit Providers	3	92	5	8	82	11
Expectations regarding general economic activity	47	42	11	47	47	5
Retention of the Central Bank Rate (CBR)	19	76	5	19	78	3
Political Risk	45	55	0	47	47	5
Investment in Government Securities	5	95	0	13	84	3
COVID-19	100	0	0	97	3	0

## 2.5. Non-Performing Loans (NPLs)

### 2.5.1 Expected Movements of Non-Performing Loans in the next quarter

- 47 percent of the respondents indicated that NPLs are likely to fall in the fourth quarter of 2022. This is attributed to enhanced recovery efforts being implemented by most banks.
- 29 percent of the respondents expect the level of NPLs to rise in the fourth quarter of 2022. The increase in NPLs is mainly due to subdued business activities because of slowed recovery from coronavirus (COVID-19) pandemic.
- 24 percent of respondents expect NPLs to remain constant. This is depicted in **Chart 5**.

**Chart 5: Expected movements of NPLs in the next Quarter (%)**



## 2.5.2 Expected Non-Performing Loans per sector during the next Quarter

- Respondents indicated that the level of NPLs

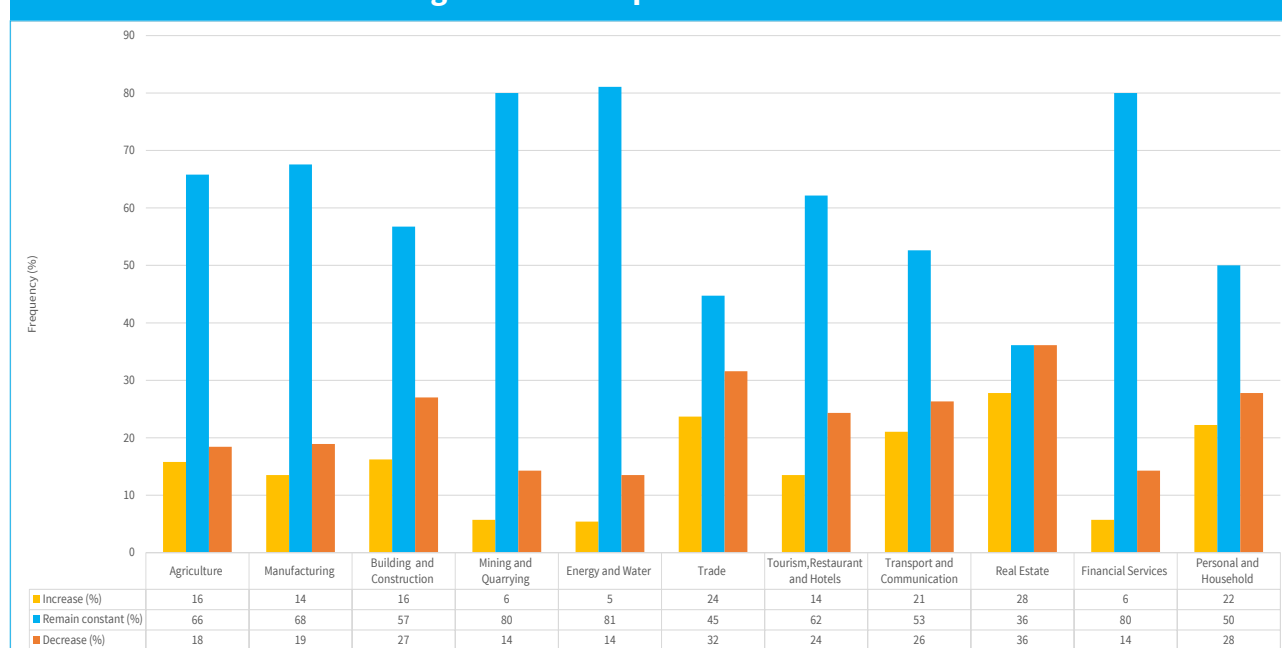
is expected to remain constant in all economic sectors during the next quarter.

- Table 5** and **Chart 6** depict this.

**Table 5: Non-Performing Loans Trend Per Economic Sector**

Percentage (%)	June 2022			September 2022		
	Increase	Remain constant	Decrease	Increase	Remain constant	Decrease
Agriculture	15	72	13	16	66	18
Manufacturing	26	53	21	14	68	19
Building and Construction	26	45	29	16	57	27
Mining and Quarrying	10	76	14	6	80	14
Energy and Water	8	81	11	5	81	14
Trade	32	34	34	24	45	32
Tourism, Restaurant and Hotels	29	45	26	14	62	24
Transport and Communication	28	46	26	21	53	26
Real Estate	32	42	26	28	36	36
Financial Services	8	74	18	6	80	14
Personal and Household	29	42	29	22	50	28

**Chart 6: Non-Performing Loans Trend per Economic Sector**



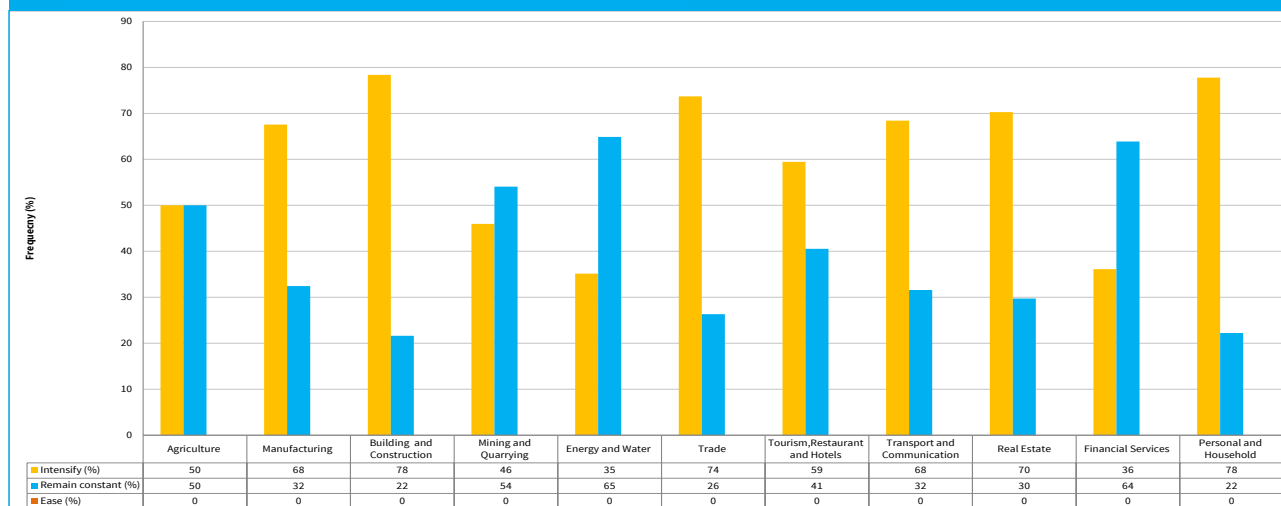
## 2.6 Credit Recovery Efforts in the next Quarter

- For the quarter ended December 31, 2022, banks expect to intensify their credit recovery efforts in eight economic sectors and remain constant in three sectors (Mining and Quarrying, Energy and Water, and Financial Services). The intensified recovery efforts are aimed at improving the overall quality of the asset portfolio.
- The main sectors that banks intend to intensify credit recovery efforts: -
  - Personal and Household (78 percent).
  - Building and Construction (78 percent).
  - Trade (74 percent).
  - Real Estate (70 percent).
  - Transport and Communication (68 percent).
  - Manufacturing (68 percent).
- The responses on the expected credit recovery efforts by the banks are depicted in **Chart 7** and **Table 6**.

**Table 6: Credit Recovery Efforts**

	June 2022			September 2022		
	Intensify	Remain Constant	Ease	Intensify	Remain Constant	Ease
Agriculture	56	41	3	50	50	0
Manufacturing	71	26	3	68	32	0
Building and Construction	74	24	2	78	22	0
Mining and Quarrying	45	53	2	46	54	0
Energy and Water	49	49	2	35	65	0
Trade	77	21	2	74	26	0
Tourism, Restaurant and Hotels	68	29	3	59	41	0
Transport and Communication	74	23	3	68	32	0
Real Estate	74	24	2	70	30	0
Financial Services	46	54	0	36	64	0
Personal and Household	81	14	5	78	22	0

**Chart 7: Credit Recovery Efforts**



## 2.7 International Financial Reporting Standard (IFRS) 9 on Financial Instruments

- The International Financial Reporting Standard (IFRS) 9 on Financial Instruments became effective from January 1, 2018. This standard replaced International Accounting Standard (IAS) 39 on Financial Instruments (Recognition and Measurement).
- IFRS 9 introduced a new method of determining provisions for expected losses on loans extended by lending institutions.
- Institutions are required to recognize expected credit losses at all times and to update the amount of expected credit losses recognized at each reporting date to reflect changes in the credit risk of financial instruments.
- In the quarter ended September 30, 2022, the Central Bank of Kenya assessed: -
  - i. The challenges that banks still experience in the implementation of IFRS 9 and mitigation measures implemented.
  - ii. Whether the banks have made any changes in the assumptions used in IFRS 9 and if they are more reliable.

### 2.7.1 Challenges experienced in the Implementation of IFRS 9

- Most banks have adopted a tight credit risk appraisal, ensuring that facilities are well secured and that alternative sources of repayment are available.
- However, implementation of IFRS 9 has had some challenges. These are the prevalent challenges pointed out by the respondents.
  - i. Lack of uniformity in probability of defaults (IFRS 9 models) across all banks in Kenya.
  - ii. There is constant model redevelopments that occur with the emergence of new information. This is costly as banks have to keep improving and updating their existing models.
  - iii. Macro-Economic factors brought about by the pandemic have made it more difficult to compute the Probability of Default (PD).

### 2.7.2 Mitigation Measures implemented in dealing with challenges faced in the Implementation of IFRS 9

- Banks have implemented the following mitigation measures: -
  - i. Increasing the robustness of the predictive model to ensure the PDs generated are as representative as possible.
  - ii. Seeking for additional capital injection to accommodate the expected rise in Credit Losses.
  - iii. Realignment of business models to minimize credit losses on unutilized limits and to enhance efficiency in internal operations.
  - iv. Insistence on good quality security in all borrowings to help minimize provisions.
  - v. Investment in credit scoring systems.

### 2.7.3 Changes made by commercial banks on the assumptions used in IFRS 9

- Banks have increased the PD rate.
- Some banks have updated the segmentation of the loan book to be more relevant in the COVID-19 environment. The segmentation has moved away from the size of the loans and is now based on the industry of their customers.

### 2.7.4 Actions by the commercial banks to ensure that the assumptions are reliable

- Banks have improved their data quality over the past two years to ensure assumptions can easily be tested.
- Some banks compare the assumptions with current and forecasted business environment.
- Information is sourced by banks from credible vendors and subjected to rigorous statistical tests to ensure consistency and accuracy.

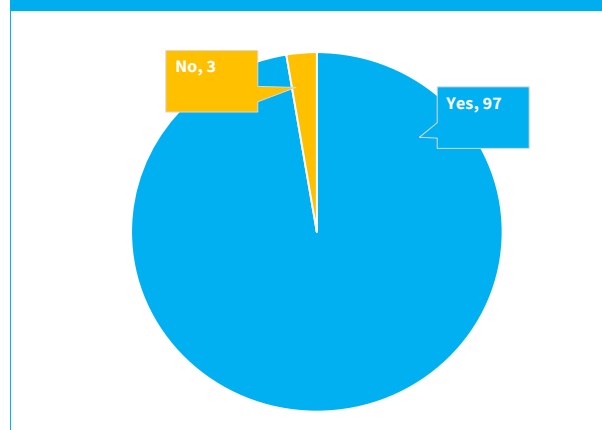
## 2.8. International Financial Reporting Standard (IFRS) 16 on Leases

- The International Financial Reporting Standard (IFRS) 16 on Leases became effective from January 1, 2019. This standard replaced International Accounting Standard (IAS) 17 on Leases.
- The main difference between IAS 17 and IFRS 16 is the treatment of operating leases by lessees. Under IAS 17, a lessee was not obligated to report assets and liabilities from operating leases on their balance sheet but instead report the leases as off-balance sheet items. IFRS 16 changes this by requiring lessees to recognize operating leases right of use (ROU) assets and lease liabilities on the balance sheet.
- IFRS 16 aims to improve the quality of financial reporting for companies with material off balance sheet leases.

### 2.8.1 Implementation of IFRS 16

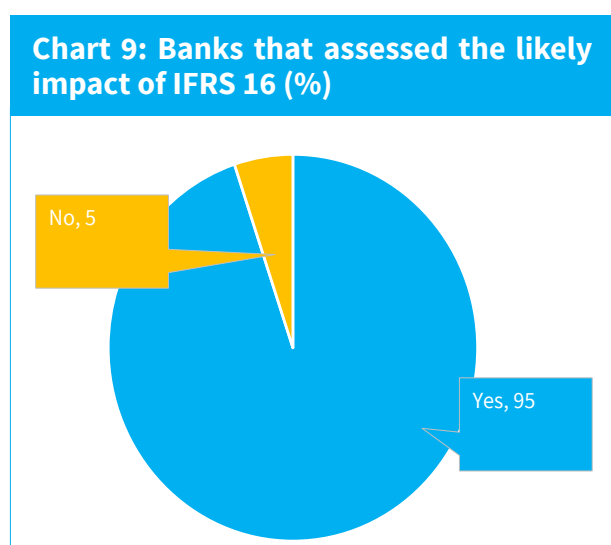
- During the quarter ended September 30, 2022, 97 percent of the respondents had implemented IFRS 16. This is depicted in **Chart 8**.

**Chart 8: Banks that have implemented IFRS 16 on Leases (%)**



### 2.8.2 Assessment of the Impact of IFRS 16

- During the quarter ended September 30, 2022, 95 percent of the respondents had assessed the impact of IFRS 16 on their financial performance and position. This is depicted in **Chart 9**.



### 2.8.3 Impact of IFRS 16 on Banks' Financial performance and position

Most banks indicated that implementation of IFRS 16 :-

- Increased their risk weighted assets.
- Increase in operating lease costs arising from straight lining of depreciation on the resultant right of use asset (ROU) and an additional finance charge based on the net lease liability and an appropriate discount rate (IBR).

### 2.8.4 Financial indicators for Leases

- Following the implementation of IFRS 16 on January 1, 2019, the value of the financial indicators for leases in the banking industry as at September 30, 2022 are indicated in **Table 7**.

**Table 7: Financial elements bank value as at September 30, 2022**

Banking Industry (Ksh '000)	June 2022	September 2022
Right of use (ROU) assets	35,947,813.26	35,317,124.20
Lease liabilities	29,635,859.70	30,448,241.65
Depreciation of the right of use asset	7,972,780.09	7,049,856.38
The finance charge associated with the lease liability	1,500,078.79	2,601,533.53

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### 2.8.5 Challenges experienced in the Implementation of IFRS 16

- Most banks indicated that the major challenge they faced in implementation of IFRS 16 include: -
  - i. Determining the discounting rates is a challenge.
  - ii. Accounting for VAT by banks, which forms part of business costs.
  - iii. Volatility of exchange rates where rent is payable in foreign currencies.

### 2.8.6 Mitigation measures on the challenges experienced in Implementation of IFRS 16

- As a mitigation measure, banks have indicated that they: -
  - i. Use the yield on Treasury bonds that

mirror the tenor of existing leases as the appropriate discount rate (IBR).

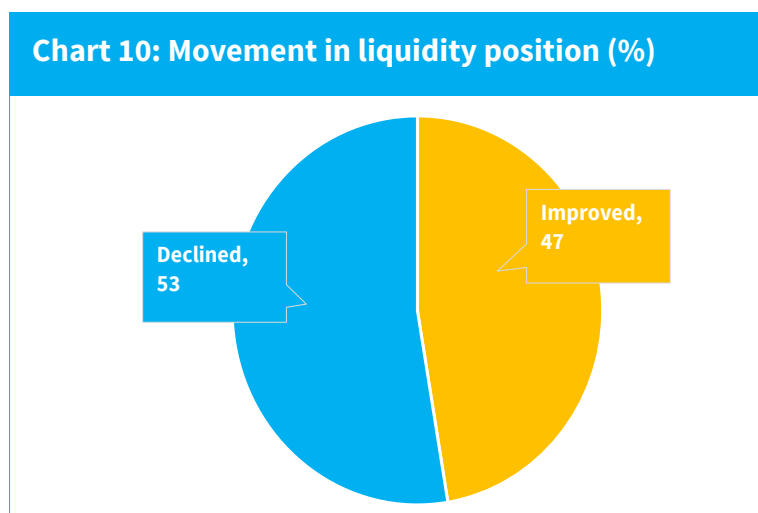
- ii. Maintain database of all leases; clearly differentiating short term and long-term in line with the standard.
- iii. Have automated the operationalization of IFRS 16.

### 2.9 Liquidity Risk

- Banks were required to state the status of their liquidity positions, factors that led to improved liquidity, their plans with improved liquidity, measures being taken with deteriorated liquidity and their involvement in interbank activities during the quarter ended September 30, 2022.

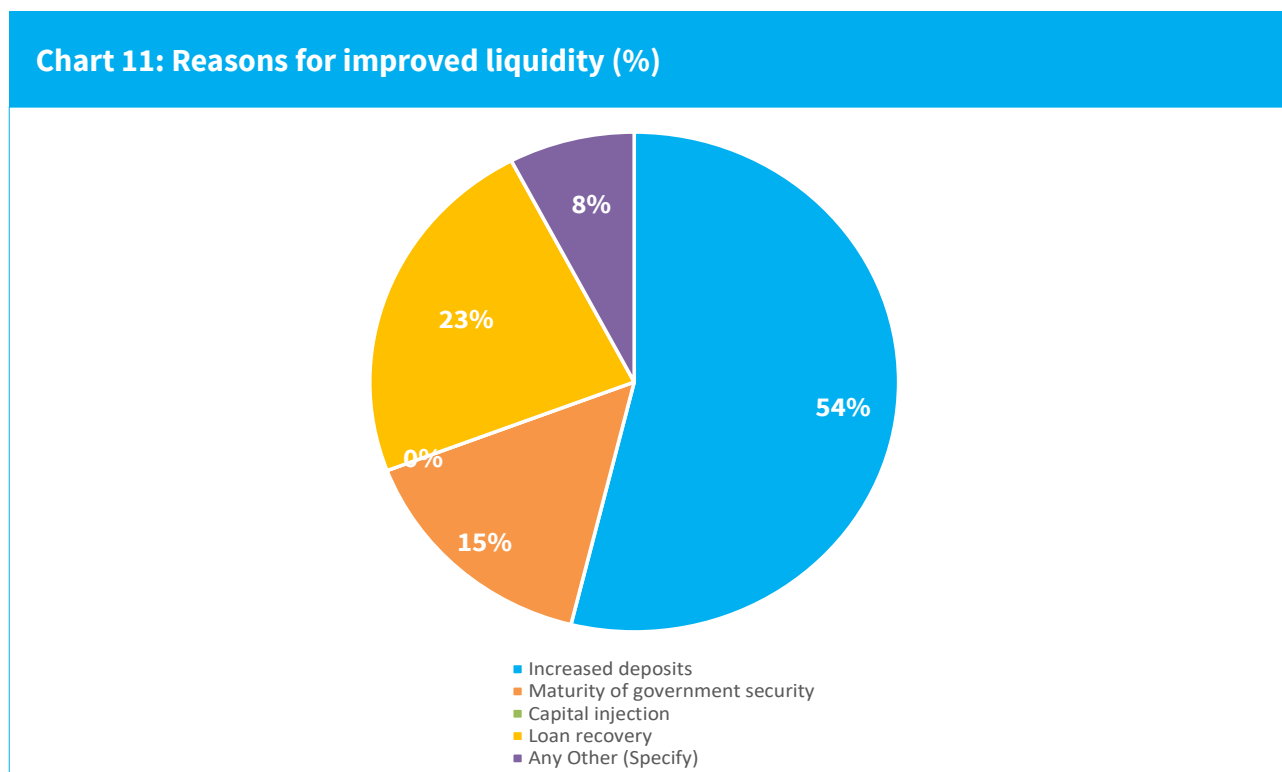
### 2.9.1 Commercial Banks' liquidity positions

- During the quarter ended September 2022, 47 percent of the respondents indicated that their liquidity position had improved as indicated in **Chart 10**.



### 2.9.2 Factors that led to improved liquidity in the quarter ended September 30, 2022

- During the quarter ended September 30, 2022, liquidity improved mainly as a result of: -
  - Increased deposits (54 percent).
  - Loan recovery (23 percent).
  - Maturity of government securities (15 percent).
- The drivers of improved liquidity are indicated in **Chart 11**.



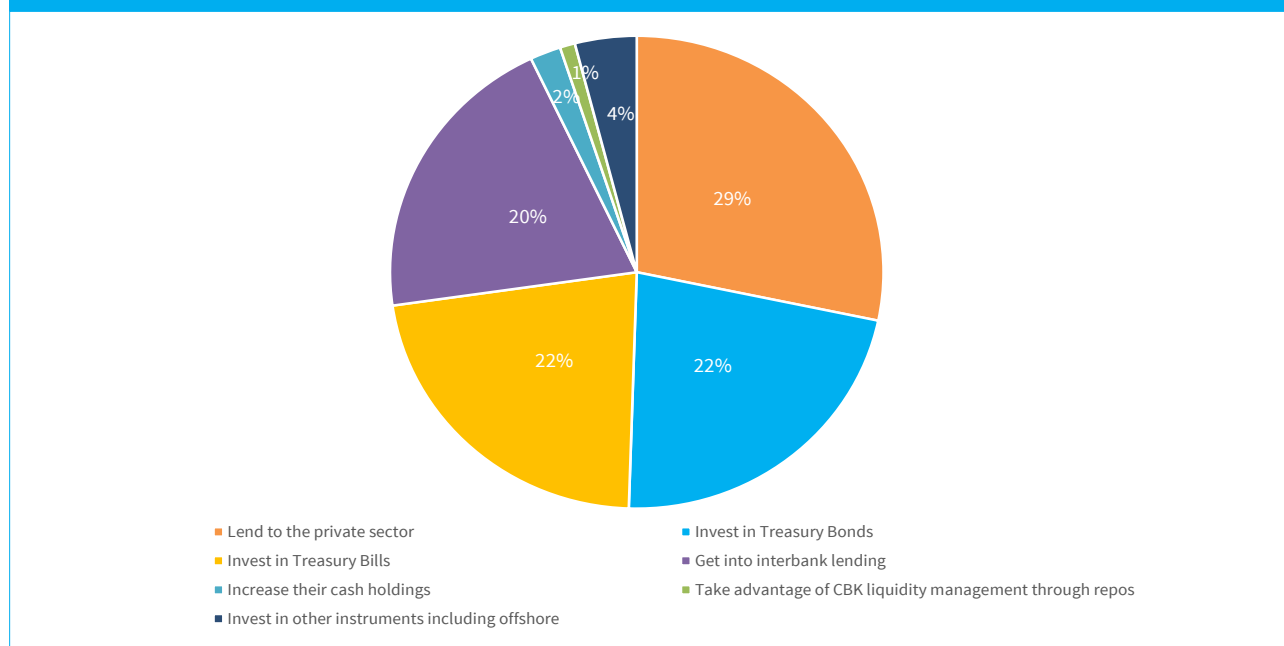


### 2.9.3 Commercial Banks' plans with improved liquidity

- As indicated in **Chart 12**, with the improved liquidity, it is expected that in the fourth quarter of 2022, credit to private sector will increase as several banks intend to deploy the additional liquidity towards lending to the private sector

(29 percent), investing in Treasury Bonds (22 percent), investing in Treasury Bills (22 percent), interbank lending (20 percent), invest in other instruments including offshore (4 percent), and increase their cash holdings (2 percent).

**Chart 12: Plans with improved liquidity (%)**



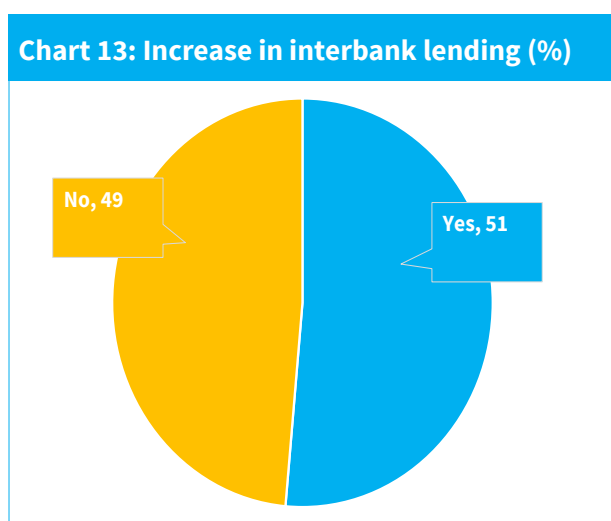
### 2.9.4 Measures being taken by Commercial banks to enhance deteriorated liquidity

- During the quarter ended September 2022, 53 percent of the respondents indicated that their liquidity position had deteriorated as indicated in **Chart 10**.

- The affected banks are enhancing their deposit mobilization campaigns to enhance their liquidity positions.

### 2.9.5 Commercial Banks' interbank activities during the quarter

- During the quarter ended September 30, 2022, 51 percent of the respondents indicated that their interbank lending activities increased. This is indicated in **Chart 13**.

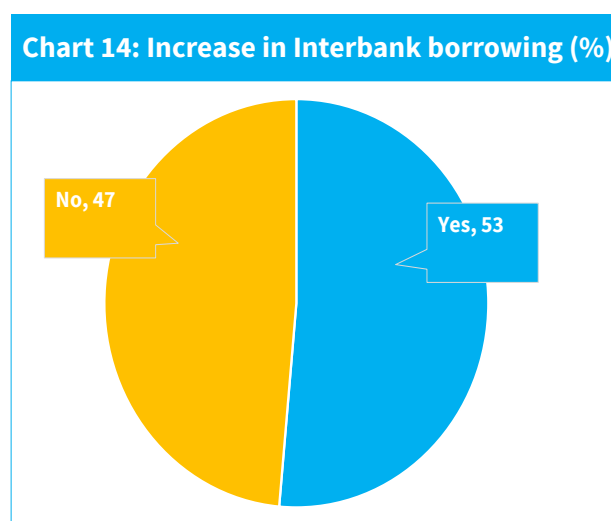


### 2.10 Coronavirus (COVID-19) Pandemic on the Banking Sector

The economic impacts of COVID-19 have been adverse and wide-ranging, disrupting international trade, transport, tourism, and urban services activity. CBK through the credit survey assessed the impact of the pandemic on the banking sector. In the quarter ended September 30, 2022, the survey covered areas relating to: -

- Adverse impact of the pandemic on the banks.
- Measures banks are taking to curb the adverse impact of the pandemic on banks' business.
- The key risks that have been increased by the pandemic.
- Opportunities that have arisen from the pandemic.

- 53 percent of the respondents indicated that their interbank borrowing increased. This is indicated in **Chart 14**.
- Interbank borrowing has generally increased due to maintaining of credit standards by institutions for all categories of facilities.



#### 2.10.1 Adverse Impact of Coronavirus (COVID-19) pandemic on the banks

The commercial banks have indicated that the pandemic has had an adverse impact on their business including:-

- Delayed repayment of loans.
- Several requests for loan moratorium and restructure extension.
- Increase in default rate especially on household loans.
- Low business income.

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### 2.10.2 Measures taken by banks to curb the potential impact of coronavirus pandemic

Commercial banks have put in place the following measures to curb the adverse impact of the pandemic: -

- Banks grant additional loans support to customers.
- Banks are striving to become more liquid.
- Banks are aiming to enhance their capital.

### 2.10.3 Key Risks arising from Coronavirus (COVID-19) pandemic on the banks

Some of the key risks increased by the pandemic include:

- **Credit risk:** Due to the adverse effect of the pandemic on the economy hence affecting customers' ability to meet their financial obligations. There is also uncertainty on

customer incomes and employment coupled with reducing collateral values.

- **Operational risk:** This can occur in case of mass infection among the staff.
- **Cyber security risk:** Due to increased use of digital banking and staff working remotely.

### 2.10.4 Opportunities arising from Coronavirus (COVID-19) pandemic on the banks

Some of the opportunities arising from the pandemic include:

- Emergent opportunities in certain industry segments like Health, Manufacturing, Fast-Moving Consumer Goods (FMCG) and Information Communication Technology (ICT) which have continued to expand.

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## LIST OF RESPONDENTS

1. Absa Bank Kenya Plc.
2. Access Bank (Kenya) Plc.
3. African Banking Corporation Ltd.
4. Bank of Africa Kenya Ltd.
5. Bank of Baroda (K) Ltd.
6. Bank of India.
7. Citibank N.A Kenya.
8. Consolidated Bank of Kenya Ltd.
9. Co-operative Bank of Kenya Ltd.
10. Credit Bank Plc.
11. Development Bank of Kenya Ltd.
12. Diamond Trust Bank (K) Ltd.
13. DIB Bank Kenya Ltd.
14. Ecobank Kenya Ltd.
15. Equity Bank Ltd.
16. Family Bank Ltd.
17. First Community Bank Ltd.
18. Guaranty Trust Bank (Kenya) Ltd.
19. Guardian Bank Ltd.
20. Gulf African Bank Ltd.
21. Habib Bank A.G Zurich.
22. HFC Ltd.
23. I & M Bank Ltd.
24. Kingdom Bank Ltd.
25. KCB Bank Kenya Ltd.
26. Mayfair CIB Bank Ltd.
27. Middle East Bank (K) Ltd.
28. M Oriental Bank Ltd.
29. National Bank of Kenya Ltd.
30. NCBA Bank Kenya Plc.
31. Paramount Bank Ltd.
32. Prime Bank Ltd.
33. SBM Bank Kenya Ltd.
34. Sidian Bank Ltd.
35. Spire Bank Ltd.
36. Stanbic Bank Kenya Ltd.
37. Standard Chartered Bank (K) Ltd.
38. Victoria Commercial Bank Ltd.
39. UBA Kenya Bank Ltd.



**Central Bank of Kenya**

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