

Uganda Retirement Benefits Regulatory Authority (Performance Assessment of Scheme Trustees, Key Officers and Service Providers) Guidelines. Guideline No.3 of 2023



URBRA (PERFORMANCE ASSESSMENT OF SCHEME TRUSTEES, KEY OFFICERS AND SERVICE PROVIDERS) GUIDELINES 2023

The URRBA (Performance assessment of Scheme Trustees, Key Officers and Service Providers) Guidelines, 2023, are issued pursuant to Sections 5 (2)(b) and 93 of the Uganda Retirement Benefits Regulatory Authority Act, 2011 and Regulation 5(3)(f) of the URBRA (Management and Operation of Retirement Benefits Schemes) Regulations 2020, Statutory Instrument No. 43 of 2020 for observance by all licensed retirement benefits schemes and service providers.

These guidelines seek to set out the criteria to be utilized by trustees of retirement benefits schemes in evaluating their performance and that of their scheme's service providers.

Issued on the **24th** of **October**, **2023**.

This Guideline is not a legal document nor does it substitute the provisions of the Uganda Retirement Benefits Regulatory Authority Act 2011 and the Regulations made thereunder. The Guide should read together with the URBRA Act 2011 and the Regulations made thereunder.

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1. INTRODUCTION

- a) The URBRA (Evaluation of Schemes, Trustees, Key Officers and Service Providers) Guidelines 2023 are issued pursuant to sections 5(2)(b) and 93 of the Uganda Retirement Benefits Regulatory Authority Act, 2011 and Regulation 5(6) of the URBRA (Management and Operation of Retirement Benefits Schemes) Regulations 2020, for adherence by all licensed retirement benefits schemes, trustees and service providers.
- b) Under Regulation 5(3)(f) of the URBRA (Management and Operation of Retirement Benefits Schemes) Regulations 2020, trustees are required to submit to the Authority copies of an annual evaluation report of the scheme, key officers and service providers. Trustees in fulfilling their fiduciary duty as laid out in Section 73 of the URBRA Act, 2011, are charged with ensuring that the delegated service providers are performing their duties in the best interest of scheme members and beneficiaries.
- c) These Guidelines are not meant to replace the existing Regulations but to act as a guide to be used concurrently with the Act and Regulations in assessing the performance of the scheme, trustees and service providers to ensure effective scheme governance.

2. PURPOSE

- (a) These guidelines seek to provide trustees with guidance in assessing their performance and that of the scheme, Key officers and service providers. It provides an overview of the areas to be assessed in the evaluation.
- (b) These guidelines provide an overview of the assessment criteria to be considered by trustees during the evaluation of the scheme, trustees, key officers and the service providers. An evaluation report is to be compiled focusing on overall performance.

3. APPLICATION AND SCOPE

- (a) The evaluation of the scheme, key officers, trustees and service providers may be undertaken through a consultant. Trustees may decide to evaluate the service providers using the criteria laid out in these guidelines.
- (b) These Guidelines provide the minimum standards to be utilized by all Trustees in evaluating their performance and that of their schemes, key officers and service providers.

4. EVALUATION CRITERIA

The evaluation of the scheme, Trustees, Key officers and service providers is to be carried out annually by the trustees. Trustees are required to assess the performance of service providers annually focusing on the key areas that cover their duties and roles.

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The assessment should then aid the Trustees' decision-making during contract renewal or termination for the service providers.

Evaluation Parameters for consideration

TRUSTEES	
Scheme Management	Oversight over operations of the scheme
	Reconciliation of scheme bank statements with custodian
	Provision of summarized scheme financials to members
	Maintenance of scheme bank statements
	Timely processing of member benefit payments
	Review IPS every 3 years and inform Authority of any reviews
	Proper oversight and maintenance of all bank transactions and accounts
	Accuracy of benefit payments to members
	Keep full record of the financial operations as well as scheme memberships of the scheme.
Licensing	Renew individual trustee licenses 3 months to end of licensing period
Outsourcing	A developed and approved outsourcing policy
	Review of policy every 3 years
Meetings	Held and attended quarterly trustee meetings
	Attend meetings to discuss scheme funds, member queries and other issues pertinent to the scheme
Timeliness	Submit scheme financials within 4 months after the end of the scheme financial year
	Provision benefits statements to members within 30 days after submission of scheme financials to Authority
	Organize scheme AGM not later than 100 days from the end of the financial year of the scheme.
	Submit investments report within 30 days from end of the 3 months period
	Submit AGM minutes not later than 30 days from the date of the meeting.
Member Engagements	Information sharing to members
	Provision of a summarized trust deed and rules to members
	Ensure routine trainings for members are held
Performance Monitoring and Accountability	Evaluate service providers performance annually
	Evaluation of trustees' performance annually (self-evaluation or through an outsourced consultant)
Risk Management	Approval of a risk management policy
	Review of policy every 3 years
	Routine tracking of risks in risk register
Statutory Compliance	File annual returns with URA
	Respond to and comply with URBRA information requests and directives
Handling of member queries and disputes	Member benefits' processing, delays and issues
	Resolve queries and complaints from members
	Maintain complaint register

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	Ensure members' disputes are resolved
Trustee Meetings	Attend meetings to discuss scheme fund, scheme member queries and all issues pertinent to the scheme
Appointment & Evaluation of service providers	Appoint all scheme service providers
	Appoint external audit for audit of scheme accounts
Scheme Funds	Ensure collected scheme funds are properly invested according to scheme IPS and URBRA (Investment of Scheme Funds) Regulations, 2014
	Develop and review the IPS with qualified financial expert every 3 years
	Oversight of scheme investments by fund manager
SERVICE PROVIDERS	
Regulation 9(3)(a) of the URBRA (Management and Operation of Retirement Benefits Schemes) Regulations, 2020 states that the service level agreement will include the obligations of each party to the agreement.	
The evaluation of the service providers by trustees to be determined by the service level agreement as provided for under the Uganda Retirement Benefits Regulatory Authority (Management and Operation of Retirement Benefits Schemes) Regulations, 2020.	
ADMINISTRATOR	
Scheme Records	Prepare all annual scheme benefit statements.
	Keep a record of all trustee meetings
	Keep and update scheme member records i.e.; member data, member statements, levy payments
	Perform reconciliations of member records
Scheme Communications	Efficient scheme meeting administration
	Organize and attend all quarterly trustee meetings
	Provide members with access to account and benefit statements
Trainings and Capacity Building	Organize annual trainings for trustees
	Enroll trustees for trustee certification program as required by URRBA
	Formulated board papers for trustee meetings
	Organize retirement seminars and forums for members
Scheme Accounting	Prepare and maintain scheme annual accounts.
	Maintain record of scheme liquidity and cashflows
	Provide scheme quarterly and annual accounts for audit
Payments	Process members' benefits payments within 30 days from date of approval of benefits application
	Arrange and process payments for services to the scheme
	Receipts and invoices for the scheme done on time
Reporting to the Authority	Prepare and submit scheme annual accounts
	Review trust deeds and deeds of appointment
	File annual tax returns with URA
CUSTODIAN	
	Ensure deposit and maintenance of funds

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Custody of scheme funds	Ensure safe custody of assets and funds
Communications	Notify trustees and administrator on remittance of contributions within 24 hours of contributions receipt
	Timely reporting to administrator, trustees and URBRA
Risk Management & Control	Ensure investment of scheme funds are in line with set benchmarks
	Review of internal risk control measures
Reporting to the Authority	Submit a report on assets under custody every quarter
Record keeping	Maintain accurate record of scheme documents i.e.; title deeds, securities
FUND MANAGER	
Investment of scheme funds	Invest in line with the scheme IPS benchmarks
	Submit investment reviews to trustees with accuracy specified in scheme IPS
Reporting to the Authority	Update trustees scheme fund performance
	Prepare report for quarterly trustee meetings
	Provide valuation reports to trustees
Performance measurements	Money weighted rate of return (MWRR) Trustees to determine whether the fund manager's IRR of evaluation period is greater than previous period IRR
	Time weighted rate of return (TWRR) Trustees to determine whether the fund manager's compounded rate of growth of evaluation period is greater than previous period compounded rate of growth
Portfolio performance appraisal techniques	Sharpe ratio A higher sharpe ratio indicates the fund manager returns a higher return for the scheme after risk is adjusted. $\text{Sharpe ratio} = \frac{\text{Scheme Fund Returns} - \text{Risk free return}}{\text{Total Risk}}$ The evaluated period's sharpe ratio should be higher than previous period's sharpe ratio
	Treynor ratio A higher Treynor ratio indicates the fund manager eliminates unsystematic risk as much as possible whilst making scheme investments $\text{Treynor ratio} = \frac{\text{Fund returns} - \text{Risk free return}}{\text{Systematic risk}}$ The evaluated period's Treynor ratio should be higher than previous period's sharpe ratio
	Information ratio Trustees to utilize this ratio to determine how fund manager's active returns compare to active risk $\text{Information Ratio} = \frac{\text{Scheme fund returns} - \text{Benchmark Returns}}{\text{Active Risk}}$
EXTERNAL AUDITOR	

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Audit	Provide scheme financial statements are fully audited within the stipulated time
Timeliness	Ensure audit is completed in time for annual submission of scheme accounts
ACTUARY	
Valuation	Ensure valuation of scheme assets and liabilities
Reporting	Submit actuarial valuation report to trustees

5. CONFIDENTIALITY

All Parties privy to any information retrieved during the evaluation exercise as well as after the provision of the evaluation report must maintain utmost confidentiality of the provided information.

- a) Trustees should ensure that the retrieved information from the service providers is used only for the purpose of evaluation.
- b) Confidentiality, security and protection of any data and information used during the evaluation should form part of the agreements between trustees and service providers.

6. TRANSITION PERIOD

- a) With immediate implementation, Trustees are required to conduct an annual evaluation of their schemes, key officers and service providers in accordance with Regulation 5(3)(f) of the URBRA (Management and Operation of Retirement Benefits Schemes) Regulations 2020.
- b) Trustees are expected to follow the criteria in 4 above to develop evaluation templates for the evaluation of their schemes, key officers and service providers.
- c) The Trustees are required to submit a copy of the evaluation reports to the Authority in accordance with Regulation 5(6) of the URBRA (Management and Operation of Retirement Benefits Schemes) Regulations 2020.

7. EFFECTIVE DATE

The effective date of this Guideline is the date on which it is signed.

8. PERFORMANCE EVALUATION TEMPLATE

A trustee of a licensed retirement benefits scheme shall, within three months after the end of the financial year, submit to the Authority an evaluation report of the scheme, trustees, key officers and service providers in the form prescribed in Schedule 1.

Issued on this 24th day of October 2023.



Signed:

Martin A. Nsubuga
CHIEF EXECUTIVE OFFICER

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SCHEDULE ONE

RATING SCALE DEFINITIONS

Use the 5-level rating scale described below to evaluate performance within the period;

5. Outstanding

- Performance is distinguished, consistently exceeding targets, standards, and expectations and reflects a rare level of contribution.
- Demonstrates high level of knowledge or skill in complex aspects
- Has a significant and direct influence on the positive performance of the Scheme

4. Exceeds Expectations

- Performance exceeds goals, standards, and expectations, reflecting a superior level of contribution.
- Demonstrates better than required knowledge and/or skill
- Has a visible and positive influence on the performance of the Scheme

3. Competent and Effective

- Performance is successful, meeting performance goals, standards, and expectations.
- Demonstrates required knowledge and/or skill to perform assigned duties successfully
- Has a positive effect on the performance of the Scheme.

2. Needs Improvement

- Meets some goals, standards, and expectations but performance is inconsistent and there are areas of deficiency
- Does not demonstrate required knowledge and/or skill to perform certain duties
- Performance may have a negative impact on the Scheme

1. Unsatisfactory

- Performance is consistently below standards and expectations in many areas. Rarely completes assignments or achieves performance goals on schedule
- Does not demonstrate required knowledge and/or skills to perform most duties
- Performance has a negative impact on the Scheme.

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Appendix 1: Template for Trustees Performance Assessment

Name of the Scheme:

Evaluation Period:

Evaluation Date:

A. Performance Rating Definition (*Scheme to determine its performance rating*)

Rating	Score
Outstanding	5
Exceeds Expectations	4
Competent and Effective	3
Needs improvement	2
Unsatisfactory	1

B. Performance Factors (*Can be varied depending on scheme parameters*)

	Description	Rating	Trustee Rating (Each Trustee gives their rating)	Overall rating for Board of Trustees (average of trustees' rating)
	Licensing Compliance			
1	Each of the trustees is fully licensed	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Trustees promptly renewed their licenses before expiry	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Trustees have undertaken the Trustee Certification Programme approved by the Regulator	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Governance and Meetings			
1	Board of trustees "Board" develop a	Outstanding Exceeds Expectations		

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	schedule of regular meetings	Competent and Effective Needs improvement Unsatisfactory		
2	Board adheres to the schedule of meetings	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Trustees duly attend all scheduled meetings and actively participate	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
4	Board meetings have the right agenda	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
5	Board meetings allow for constructive, meaningful, and candid discussion, and timely resolution of issues.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
6	Board receives documents to be considered in the trustee meeting well in advance	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
7	Trustees read meeting packs prior to the meeting and actively participate in the meeting discussion and support decision making at the meetings	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
8	Board has a clear understanding of their duties, and act in the best interest of their members	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
9	Trustees' skills, experience and background are well applied and utilized during the meetings	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		

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10	Board allow for structure and ample time for discussion of the scheme business	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
11	Board has a detailed orientation programme for new trustees as well as perioding refreshed programs for the board of trustees.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
12	Trustees attend trustee trainings, workshops and seminars as part of capacity enhancement.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
13	Board regularly updates the Regulator on implementation of supervisory directives and issues raised by the regulator	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
14	Board regularly updates the sponsor on matters regarding the scheme.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
15	Trustees work together in a collegial way	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
16	Trustees jointly make decisions and always consult each other prior to making decisions	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
17	Board ensures conflicts of interest are declared and resolved.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Risk Management			
1	Board has put in place and documented policies and procedures	Outstanding Exceeds Expectations		

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	that govern conduct of business in the scheme	Competent and Effective Needs improvement Unsatisfactory		
2	Board regularly assesses the effectiveness of the scheme policies and procedures	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Board has clearly mapped out the key risks faced by the scheme, continually monitors those risks and has put in place effective measures to manage the identified risks.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
4	Board has appointed an auditor to independently review the operations of the scheme	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
5	The Board timely approves the scheme financial statements	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
6	Board has documented and clearly implemented effective processes and procedures for selection of the scheme service providers	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
7	Board ensures statutory submissions are made timely	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
8	Board has developed clear performance indicators to assess performance of scheme service providers	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
9	Board regularly assesses their performance as well as for the service providers.	Outstanding Exceeds Expectations Competent and Effective		

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		Needs improvement Unsatisfactory		
10	Board ensures that scheme business protects and enhances the sustainability of the scheme's social and natural environment.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
11	The Board has developed and implement an effective succession planning framework.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Member engagement			
1	Board scheduled and held the scheme AGM within the statutory timelines.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Board schedules and conducts regular member sensitizations	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Board ensures that members received key scheme information packs.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		

C. Key scheme highlights

- i. Provide key Highlights of Board achievements for the period under assessment

- ii. Detail the key performance areas that need improvement

- iii. Proposed plan of action towards improvement

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D. Overall Comment

Trustees' overall comment on the performance of the Board

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E. Signatures

Consultants (<i>if applicable</i>)	Signature:	Date:
Trustee 1:	Signature:	Date:
Trustee 2:	Signature:	Date:
Trustee 3:	Signature:	Date:

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Appendix 2: Template for Administrator Performance Assessment

Name of the Scheme:

Name of Administrator:

Evaluation Period:

Evaluation Date:

A. Performance Rating Definition (*Scheme to determine its performance rating*)

Rating	Score
Outstanding	5
Exceeds Expectations	4
Competent and Effective	3
Needs improvement	2
Unsatisfactory	1

B. Performance Factors (*Can be varied depending on scheme parameters*)

	Description	Rating	Administrator Assessment	Trustees Assessment
	Documentation and Compliance			
1	Draws up and effectively administers deeds of appointment and deeds of discharge for the scheme.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Reviewed scheme documents, e.g., Trust deed and rules, scheme policies, and proposed necessary amendments	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Submitted statutory information / reports as per set timelines	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
4	Updated and provided scheme information to members, trustees and service providers	Outstanding Exceeds Expectations Competent and Effective		

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		Needs improvement Unsatisfactory		
	Maintains and promptly updates members data, member statements and beneficiaries	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Design information booklets for the benefit of members	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Conduct / arrange trainings of trustees and members	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Board Secretarial and Administration			
1	Properly maintained a schedule of Board meetings for the year	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Promptly sent out meeting notices, within the allowed notice period	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Prepared Board meeting packs and ensured all trustees received the meeting information in advance of the meeting	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
4	Maintained a true and proper record of the trustees' meetings, and ensured all meeting minutes were duly signed off.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		

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5	Promptly advised trustees of regulatory requirements and legal developments, with actionable	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
6	Maintain a register and report on scheme contracts	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
7	Prepare all forms requiring completion by members such as applications and nomination forms	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
8	Advising the Board, members and the sponsor on the URBRA Act, Regulations, Trust Deed and Rules and other relevant regulations	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
9	Draw up deed of appointment and discharge of trustees	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Duly implement Board instructions issued in as part of scheme administration services	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Coordinates and liaises with the scheme sponsor, scheme service providers, URBRA, URA, and all other professionals engaged by the scheme	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Reviews all essential scheme documents and contract agreements to ensure they are	Outstanding Exceeds Expectations		

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	implemented according to scheme policies and procedures	Competent and Effective Needs improvement Unsatisfactory		
	Prepares and submits compliance reports to the trustees at the end of each quarter.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Prepares and maintains a risk register for the scheme.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Scheme Financial Accounting			
	Maintain and reconcile records of contributions, transfers in and out of the scheme, withdrawals and deferred benefits	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Prepared scheme annual budget and maintained a record of the scheme liquidity and cash flow	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Prepared scheme quarterly accounts for Board consideration and annual accounts for audit	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Prepared and timely submitted statutory reports to URBRA	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Filed scheme tax returns and ensured that scheme taxes were paid within the mandated time	Outstanding Exceeds Expectations Competent and Effective		

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		Needs improvement Unsatisfactory		
	Prepared and submitted quarterly contributions and member balances' reports	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Arrange for payment of third parties and scheme service providers.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Process benefits payment to members and beneficiaries in accordance with the law, scheme rules and procedures relating to benefits payment.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Ensure scheme is duly discharged by exiting members once benefits are paid out	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Provide members with annual benefits statements and online access to view statements from time to time	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		

C. Key scheme highlights

- iv. Provide key Highlights of administrator's achievements for the period under assessment

- v. Detail the key performance areas that need improvement

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- vi. Proposed plan of action towards improvement

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D. Overall Comment

Trustees' overall comment on the performance of the Administrator

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E. Signatures

Administrator:	Signature:	Date:
Trustee 1:	Signature:	Date:
Trustee 2:	Signature:	Date:
Trustee 3:	Signature:	Date:

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Appendix 3: Template for Custodians Performance Assessment

Name of the Scheme:

Name of custodian:

Evaluation Period:

Evaluation Date:

A. Performance Rating Definition (*Scheme to determine its performance rating*)

Rating	Score
Outstanding	5
Exceeds Expectations	4
Competent and Effective	3
Needs improvement	2
Unsatisfactory	1

B. Performance Factors (*Can be varied depending on scheme parameters*)

	Description	Rating	Custodian rating	Board of Trustees rating
	Custody of Scheme Funds			
1	Receives and keeps in custody at all times all the funds, title deed, securities and income accruing therefrom on behalf of the scheme	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Transfers, exchanges or delivers in the prescribed form securities held on behalf of the scheme upon proper instruction from the Fund Manager	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Assigns key personnel to the scheme, to liaise with the scheme on a day-to-day bases and have appropriate control of all the custody business of the scheme and reporting on the same as required from time to time	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		

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	Collections			
1	Receives contributions made to the scheme and notifies the Administrator and Fund Manager of receipt of the contributions.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Collects dividends and income in relation to the investments of the scheme	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Acknowledges receipt of all contributions and other payments to the scheme from time to time and deposits them in the scheme's custody accounts	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Reporting and Record Keeping			
1	Promptly sends bank statements and quarterly reports to trustees in accordance with the SLA.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Ensures compliance with the scheme Trust Deed and Rules, Custody contract terms, URBRA Act and regulations related to custody services.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Promptly communicates to the trustees on any significant changes pertaining to the scheme and the custodian.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
4	Undertakes registration of securities in the name of the scheme or as otherwise agreed by the parties in writing or as stipulated by the relevant CSD operational rules and practices.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
5	Liaises with the scheme service providers on matters relating to	Outstanding Exceeds Expectations		

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	custody services offered to the scheme	Competent and Effective Needs improvement Unsatisfactory		
6	Upon written instruction from the trustee and for audit purposes, provides reasonable access to all scheme records kept by the custodian in connection with its obligations to the scheme	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
7	Values the scheme investments and where there is any variation with the valuation report of the Fund Manager, prepares and circulates to the trustees and the scheme administrator reconciliations explaining the variances.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
8	Delivers to the scheme or other persons as the Trustees may authorize, copies of notices, proxies, proxy solicitation materials received by him in relation to any of the securities held in the scheme account, all public information, financial reports and stock holders' communications as he may receive from issuers of securities and all information, he may receive from an offer relating to exchange or tender offers or other rights or offerings as may be agreed upon from time to time.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
9	Attends all corporate actions concerning any of the securities held by the Trustees pursuant	Outstanding Exceeds Expectations Competent and Effective		

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	to the SLA between the Trustees and Custodian.	Needs improvement Unsatisfactory		
10	Submits to Trustees accurate reports	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
11	Reports on irregular occurrences, such as errors and omissions on the scheme accounts within the prescribed period.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
12	Ensure investment of scheme funds is in line with set asset allocations	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
13	Reviews and maintain proper internal control measures	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
14	Prepares reports for the quarterly trustee meetings and submits them well in time as per agreed timelines	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
15	Submits to URBRA, a report on assets under custody every quarter as per statutory timelines	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		

C. Key scheme highlights

- vii. Provide key Highlights of custodian achievements for the period under assessment

- viii. Detail the key performance areas that need improvement

Uganda Retirement Benefits Regulatory Authority (Performance Assessment of Scheme Trustees, Key Officers and Service Providers) Guidelines. Guideline No.3 of 2023

ix. Proposed plan of action towards improvement

D. Overall Comment

Trustees’ overall comment on the performance of the Board

E. Signatures

Consultants (<i>if applicable</i>)	Signature:	Date:
Trustee 1:	Signature:	Date:
Trustee 2:	Signature:	Date:
Trustee 3:	Signature:	Date:

Uganda Retirement Benefits Regulatory Authority (Performance Assessment of Scheme Trustees, Key Officers and Service Providers) Guidelines. Guideline No.3 of 2023

Appendix 4: Template for Fund Manager Performance Assessment

Name of the Scheme:

Name of Fund Manager:

Evaluation Period:

Evaluation Date:

A. Performance Rating Definition (*Scheme to determine its performance rating*)

Rating	Score
Outstanding	5
Exceeds Expectations	4
Competent and Effective	3
Needs improvement	2
Unsatisfactory	1

B. Performance Factors (*Can be varied depending on scheme parameters*)

	Description	Rating	Fund Manager rating	Board of Trustees rating
	Investment Management			
1	Supervise and direct the Investment and re-investment of the cash, securities and any other property in the scheme account.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Ensure that the investments of the scheme are carried out in line with the scheme's Investment Policy Statement (IPS)	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Provide advisory services to the Trustees on the investment of Funds and other assets of the scheme	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
4	Issue instructions on behalf of the Trustees to the Custodian to transfer, exchange and deliver in the required form and manner Fund	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		

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	assets held by the scheme Custodian			
5	Ensure that all monetary benefits, commissions or gains arising directly out of managing the Fund are credited into the Scheme.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
6	Issue instructions on behalf of the Trustees to the Custodian- to effect payment in respect of purchased securities or other assets	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
	Compliance and Reporting			
1	Ensure that the fund is at all times managed in compliance with the scheme Trust Deed and Rules, URBRA Act and any regulations	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
2	Submit to trustees accurate monthly, and quarterly reports within the stipulated period.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
3	Submit to URBRA the accurate investment reports within the statutory timeframes.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
4	Ensure investment reports to Trustees are submitted well in advance of the Trustee meetings	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
5	Ensure scheme does not incur losses and performs above the benchmarks set in the IPS.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
6	Promptly communicate with the trustees of any significant changes pertaining to the scheme or the Fund Manager.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		

Uganda Retirement Benefits Regulatory Authority (Performance Assessment of Scheme Trustees, Key Officers and Service Providers) Guidelines. Guideline No.3 of 2023

7	Keep or cause to be kept such books, records and statements as may be necessary to give a complete record of the Fund and investment portfolio held by the custodian, the investment transactions carried out by the custodian as instructed by the Fund Manager.	Outstanding Exceeds Expectations Competent and Effective Needs improvement Unsatisfactory		
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C. Key scheme highlights

- x. Provide key Highlights of Fund Manager's achievements for the period under assessment

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- xi. Detail the key performance areas that need improvement

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- xii. Proposed plan of action towards improvement

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D. Overall Comment

Trustees' overall comment on the performance of the Board

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E. Signatures

Consultants (*if applicable*) Signature: Date:

Trustee 1: Signature: Date:

Trustee 2: Signature: Date:

Trustee 3: Signature: Date: