


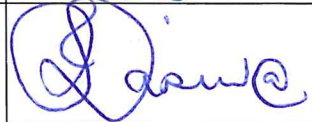




REF: KRC/PROC/ P14/01

SUPPLY CHAIN POLICY

NAME:	SIGNATURE:	DATE:
PREPARED BY: MANAGER (SUPPLY CHAIN)		15/07/21
CONTROLLED BY: ISO MANAGEMENT REPRESENTATIVE (MR)		15/07/2021
RECOMMENDED BY: MANAGING DIRECTOR		15/7/2021
APPROVED BY : CHAIRMAN - BOARD OF DIRECTORS		24/7/2021



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DATE	ISSUE NO.	OLD REV. NO.	NEW REV. NO.	SECTION(S)/ PAGE	DESCRIPTION / SUMMARY OF REVISION	NAME OF PERSON WHO IDENTIFIED THE CHANGE	SIGN
15.07.2021	01	00	01	Page 4	From regulations 2006 to regulations 2020	SCM	
15.07.2021	01	00	01	Page 7	From regulations 2006 to regulations 2020	SCM	
15.07.2021	01	00	01	Page 8	From regulations 2006 to regulations 2020	SCM	
15.07.2021	01	00	01	Page 8	From Prequalification of suppliers to <i>Registration of Suppliers</i>	SCM	
15.07.2021	01	00	01	Page 9	From regulations 2006 to regulations 2020	SCM	
15.07.2021	01	00	01	Page 10	From regulations 2006 to regulations 2020	SCM	
15.07.2021	01	00	01	Page 11	From regulations 2006 to regulations 2020	SCM	
15.07.2021	01	00	01	Page 12	Update role of Managing Director	SCM	
15.07.2021	01	00	01	Page 12 & 13	Update role of Supply chain Manager	SCM	
15.07.2021	01	00	01	Page 14	Update role Of User Departments.	SCM	
15.07.2021	01	00	01	Page 19	From regulations 2006 to regulations 2020	SCM	



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CHAPTER ONE

1.0 GENERAL POLICY

1.1 INTRODUCTION

The Public Procurement and Asset Disposal Act 2015 section 3 states that public procurement and asset disposal by state organs and public entities shall be guided by the following values and principles of the Constitution and relevant legislations-

- (a) The national values and principles provided for under Article 10;
- (b) The equality and freedom from discrimination provided for under Article 27
- (c) Affirmative action programme provided for under Articles 55 and 56;
- (d) Principles of integrity under the Leadership and Integrity Act, 2012;
- (e) The principles of public finance under Article 201;
- (f) The values and principles of public service as provided for under Article 232
- (g) Principles governing the procurement profession, international norms;
- (h) Maximization of value for money;
- (i) Promotion of local industry, sustainable development and protection of the environment; and
- (j) Promotion of citizen contractors.

The policy is aimed at establishing a framework for entrenching the Public Procurement and Asset Disposal Act (2015) and Public Procurement and Asset Disposal Regulations 2020 within the Corporation.

The Public Procurement and Asset Disposal Act Section 45 requires a public entity to establish systems and procedures to facilitate decision making for procurement and asset disposal.



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1.2 OBJECTIVES

The purpose of the Procurement & Disposal Policy is to establish the guidance for procurement, storage and distribution of goods/services and disposal of unserviceable, obsolete or surplus stores and equipment by the Kenya Reinsurance Corporation "Kenya Re" and to ensure compliance with the procurement rules and regulations.

The aim of the policy is to enable Kenya Re to:

- Maximize economy and efficiency through ensuring value for money for the Corporation and improving the performance of the procurement process as cost effectively as possible and in a timely manner.
- Promote competition and ensure that competitors are treated fairly; Public procurement calls for provision of equal opportunities for participation to interested and qualified suppliers of goods, works or services. This ensures a healthy and effective competition. It is principally through such an open and effective competitive environment that the Corporation can get the best value in procurement and at minimum cost while making it possible for the suppliers/contractors to fully benefit from doing business within a regulated environment that safeguards against favoritism, profiteering and provides equal participating opportunities to every potential and eligible supplier/contractor.
- Promote the integrity and fairness; the code of conduct for the officers involved in the procurement process guard against conflict of interest and provides measures to regulate matters regarding employees responsible for procurement, such as declarations of interest in particular procurements, ethics, confidentiality and accuracy of the information.
- Increase transparency, accountability; and increase public confidence in the procurement process. Transparency and accountability in public procurement are presented in the context of 'corruption'. Corrupt, coercive, collusive and fraudulent practices.



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The Public procurement system, therefore, demands a high level of transparency and accountability through its procurement of goods, works and services.

Procuring entities should ensure there is openness and clarity on procurement policy and its delivery. In addition, effective mechanisms must be put in place to enable accounting officers to execute their personal responsibility on issues of procurement risk and expenditure. They must be able to show how the public interest has been protected in the expenditure of public funds.



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1.3 PURPOSE OF THE POLICY

The purpose of the Procurement & Disposal Policy is to ensure that procurement of all works, good, services and disposal of assets is conducted in an honest, competitive, fair and transparent manner that delivers the best value for Kenya Reinsurance Corporation, taking into account the required specification, quality, service, delivery, reliability, environmental and social issues while adhering to the legal framework and to:

- maximize economy and efficiency;
- promote competition and ensure that competitors are treated fairly;
- promote the integrity and fairness;
- Increase transparency and accountability; and increase public confidence in the procurement process.

1.4 SCOPE OF APPLICATION

This Supply chain Policy covers:

- (a) Procurement of works, goods and services,
- (c) Procurement of consulting services
- (d) Storage and distribution of goods
- (e) Contract management
- (f) Records management
- (g) Disposal of goods.

1.5 CROSS REFERENCE

The Policy is referenced to the following documents:

- a) Public procurement and Asset Disposal Act, 2015
- b) Public Procurement and Asset Disposal Regulations 2020.
- c) Constitution of Kenya 2010
- d) Public Procurement and Disposal General Manual
- e) Public Procurement Records Management Manual
- f) Standard Bidding Documents Published by Public Procurement & Oversight Authority.
- g) PPRA Manuals



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- h) PPRA Circulars
- i) Supply Chain Procedure Manual.

1.6 RESPONSIBILITY FOR IMPLEMENTATION

- a) Subject to the provisions of Public procurement and Asset Disposal Act, 2015, the Corporations shall have overall responsibility in ensuring that all statutory requirements are fully complied with by the Corporation in respect to KENYA RE's procurements.
- b) Subject to the provision of Public procurement and Asset Disposal Act, 2015, the Managing Director shall be primarily responsible for ensuring that Public procurement and Asset Disposal Act, 2015 and Public Procurement and Asset Disposal Regulations, 2020 and any directions of Public Procurement Regulatory Authority are complied with in respect to Kenya Re's procurements.

The policies set out in this manual shall be applicable to all the Departments and Sections of the Corporations. Furthermore all parties involved in the procurement process have an obligation to follow these policies.

The Supply Chain Manager is responsible for the implementation of the policy in all the departments of the Kenya Reinsurance Corporation.

1.7 SEGREGATION OF RESPONSIBILITIES

It shall be the duty of the Managing Director to ensure that all procurements shall be handled by different offices in respect of procurement initiation, processing and receipt of goods, works and services.

1.8 REGISTRATION OF SUPPLIERS

It shall be the duty of the Supply Chain Manager to maintain and update the standing lists of registered suppliers and shall evaluate the list every two (2) years leading to a fresh registration of suppliers. The Managing Director shall have the sole right to approve the list.



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REGISTRATION OF THE SPECIAL GROUPS (YOUTH, WOMEN AND PERSONS LIVING WITH DISABILITY)

Uptake of the 30% of the Procurement Opportunities by the Special Groups

The Corporation during the Procurement Planning process shall identify the categories to be reserved for the Special Groups.

The categories shall include all generic goods and services not limited to Stationery, Printing Services, Furniture, Promotional Materials and Small Works.

1.9 GENERAL PROCUREMENT RULES

1.9.1 RESPONSIBILITY FOR INVITING TENDERS

Except as otherwise provided in these rules, the Supply Chain Manager shall be responsible for the invitation of all tenders, request for proposals and quotations

1.9.2 PURCHASING AGENT

Subject to the provision of Public procurement and Asset Disposal Act, 2015 Public Procurement and Disposal Asset Regulation, 2020 and the provisions of these rules, the Supply Chain Manager shall be the sole Procurement agent for and on behalf of the Corporation.

1.9.3 SPLITTING OF TRANSACTIONS

- a) No procurement shall be structured as two or more procurements for purposes of avoiding the use of a procurement procedure.
- b) Procurements can be unbundled in practicable quantities for the purpose of ensuring maximum participation of citizen contractors, disadvantaged groups, small and micro – enterprises in public procurement as per the Public Procurement and Disposal (Asset Regulations, 2020.

1.9.4 PROCUREMENT AND DISPOSAL DECISION MAKING ORGANS

- a) It shall be the duty of the Managing Director to ensure that Tender Opening, Evaluation, Negotiation, Disposal and the Inspection and Acceptance Committees are established to



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- b) handle relevant approvals within their mandate as stipulated in Public Procurement and Assets Disposal Act, 2015.
- b) Managing Director shall be responsible for awarding contracts in line with thresholds as stipulated in the Second Schedule threshold matrix for procuring entities contained in Public Procurement and Disposal Asset Regulations 2020.
- c) Disposal Committee shall be responsible for recommending to the Managing Director the best method of disposing unserviceable, obsolete, or surplus stores or equipment and any other recommendation pertaining disposal of Corporation's assets.
- d) Ad hoc Evaluation Committee shall be responsible for Evaluation of the tenders/Proposals and Negotiations in line with procedures stipulated in Public Procurement and Assets Disposal Act, 2015.

1.9.5 TECHNICAL SPECIFICATIONS

It shall be the duty of the user department to prepare specific requirements relating to the goods, works and services being procured that are clear, that gives a correct and complete description of what is to be procured and that allows for fair and open competition among those who may wish to participate in the procurement proceedings. The Corporation can seek assistance from another state department, government agency, professional body, or expert where they do not have requisite capacity to generate the specifications.

All specification must be approved by the Head of Department.

Specifications for complex/technical goods/services must be prepared and be reviewed by a committee comprising of user department, representative from the technical departments and procurement.

1.9.6 FAIR WAGES CLAUSE AND ENVIRONMENT CONSERVATION

It shall be the duty of the Corporation to ensure that, where appropriate, service providers ensure environmental conservation, suitable fair wages clause are inserted into any contract requiring the contractor/supplier to pay fair wages and to observe labor laws for the time being in force in the Republic of Kenya. For example Provision of Cleaning and Office Tea services, Security Services Etc.



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1.9.7 STANDARDIZATION

The head of the Head of Supply Chain function shall be responsible for assisting the accounting officer to confirm the right quality and quantity of goods, works and services have been delivered to the procuring entity and shall issue a certificate of acceptance to the accounting officer except where technical specifications are from another technical department or professionals engaged to work on behalf of the accounting officer.

1.9.8 COMMITMENT OF CORPORATION'S EXPENDITURE FOR GOODS, WORKS AND SERVICES

It shall be the duty of the Supply Chain Manager to ensure that Local Purchase/Services orders or signed contracts are the only instruments to be used to commit the Corporation to expenditure for goods, works and services except for cash purchases. Supply Chain department shall request for cash imprest from Finance department when making cash purchases.

1.9.9 NO POST FACTO APPROVALS

It shall be the duty of the Corporation to ensure that no procurement approval shall be made to operate retrospectively to any date earlier than the date on which it is made.

1.9.10 CONFLICT WITH OTHER LAWS

- a) If there is a conflict between these rules and the Public Procurement and Asset Disposal Act 2015 and Public Procurement and Asset Disposal Regulations, 2020 the Act and Regulations shall prevail.
- b) If there is a conflict between these rules and any conditions imposed by any department, these rules shall prevail with respect to the procurement process.

1.9.11 AMENDMENTS TO THESE RULES

The Corporation shall have the sole right to effect any amendments as requested by management to these rules.



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1.10 INTERNAL ORGANIZATION OF PROCUREMENT FUNCTION

1.10.1 Roles

1.10.2 Role of Managing Director

- a) Ensure that the Act, regulations, and any directions of the National Treasury or PPRA are complied with, with respect to each of Kenya Re's procurements.
- b) Ensure that Kenya Re establishes an Opening Committee, Evaluation Committee, Negotiation Committee, Inspection Committee, and a Disposal Committee in accordance with the Act and Regulations.
- c) Ensure that the Corporation has established a Procurement Unit.
- d) Sign contracts for the procurement and disposal activities on behalf of the Corporation for contracts entered into in accordance with the Act and Regulations.
- e) Ensure that Procurement plans are prepared by user departments.
- f) Ensure that the Corporation properly documents procurement proceedings and manages records in accordance with the regulations.
- g) Shall appoint all Committees of the procurement and disposal process on recommendation by the Supply Chain Manager.

1.10.3 Role of Supply Chain Manager

1. To maintain and continually update standing lists of registered suppliers for the procuring entity under sections 57 and 71 of the Act as per KenyaRe requirements.
2. To prepare tender and asset disposal documents to facilitate fair competition.
3. To prepare, publish and distribute procurement and disposal opportunities including invitations to tender, request for quotations and proposals, pre-qualification documents and invitations for expressions of interest.
4. To coordinate the receiving and opening of tender documents.
5. To submit a list of registered or prequalified suppliers or contractors or consultants to the accounting officer for approval.
6. To issue procurement and asset disposal documents to candidates in accordance with the Act and these Regulations.
7. To propose the membership of relevant committees under the Act to the accounting officer for consideration and appointment.
8. To coordinate the evaluation of tenders, quotations, and proposals.



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9. To recommend for consideration of the negotiation of a procurement by the evaluation committee where negotiations are allowed by the Act and these Regulations and participate in negotiations.
10. To prepare and publish tender awards.
11. To prepare contract documents in line with the award decision.
12. To prepare and issue debriefing letters.
13. To prepare contract variations and modifications documents.
14. To maintain and archive procurement and asset disposal documents and records for the required period.
15. To provide information, as required, for any petition or investigation to debar a tenderer or contractor or any investigation under review procedures.
16. To implement the decisions of the accounting officer, including disposal committee and coordinating all procurement activities.
17. To act as a secretariat to the evaluation, inspection and acceptance, and disposal committees.
18. To liaise with the National Treasury and the Authority on matters related to procurement and asset disposal.
19. To prepare and submit to the National Treasury or relevant county treasury and the Authority reports required under the Act, these regulations, and guidelines of the Authority.
20. To monitor contract management by user departments to ensure implementation of contracts in accordance with the terms and conditions of the contracts.
21. To report any significant departures from the terms and conditions of the contract to the head of the procuring entity or accounting officer.
22. To recommend for transfer of a procurement or asset disposal responsibility to another procuring entity by the head of the procuring entity when need arises.
23. To prepare consolidated procurement and asset disposal plans.
24. To advise the procuring entity on aggregation of procurement to promote economies of scale.
25. To co-ordinate internal monitoring and evaluation of the procurement and supply chain function.
26. To carry out market surveys to inform the placing of orders or adjudication by the relevant awarding authority.
27. To conduct periodic and annual stock taking.
28. To certify the invoices and vouchers to facilitate processing of payment to suppliers.
29. To recommend extension of the tender validity period.
30. To verify that the available stock levels warrant initiating a procurement process.
31. To carry out any other functions and duties as are provided under the Act and these Regulations and any other functions that might be stipulated by the National Treasury, or the Authority.



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1.10.4 Role of User Departments

1. Initiating procurement and asset disposal requirements and forward them to the head of Supply Chain function.
2. Participating in the evaluation of tenders, proposals, and quotations.
3. Managing, monitoring, and reporting any departure from the terms and conditions of the contract to the head of procurement function.
4. Forwarding details of any required amendments or variations to contracts including extensions to the head of procurement function for consideration and action.
5. Maintaining and archiving copies of records of contract management.
6. Preparing any reports required to the head of procurement function for submission to the accounting officer.
7. Undertaking conformity assessments of supplied goods, works and services with the specifications of the contract documents.
8. Preparing and submitting technical specifications for goods, works and services to the procurement function.
9. Preparing departmental procurement and asset disposal plans and submit to the procurement function.
10. Making clarifications on tenders, requests for quotations and any other matter through the head of procurement function as may be required; and carrying out any other functions and duties as provided for under the Act or these Regulations.

1.10.5 Procurement Code of Conduct

a) Ethics

- i) All procurement activities shall be executed in consistence with the highest professional, ethical, and moral standards.
- ii) Accordingly, persons involved in the procurement function shall not use their status within Kenya Re for personal gain and must maintain honesty and fairness while executing their responsibilities.

b) Conflict of Interest

Any employee or agent or a member of the board or committee of Kenya Re who has a conflict of interest with respect to procurement:–

- i) Shall not take part in the procurement proceedings; and



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- ii) Shall not, after a procurement contract has been entered into, take part in any decision relating to the procurement or contract.
- iii) Situations that shall give rise to conflict of interest shall be handled in line with the provision of the Act and Regulations.

c) Confidentiality and Accuracy of Information

- i) All employees or agents or members of the board shall safeguard all information coming into their possession while executing their official duties. Section 67 of the Act shall in this instance apply.
- ii) All employees are obliged to inform the Managing Director of instances of breach of this policy within reasonable time.

d) Collusion

No employee or agent or a member of the board shall collude or attempt to with any other person:-


- i) To make any proposed price higher than otherwise has been the case;
- ii) To have that other person refrain from submitting a tender, proposal or quotation.
- iii) To withdraw or change the contents of a tender, proposal or quotation;
- iv) To submit a tender, proposal or quotation with a specified price or with any specified inclusions or exclusions.

e) Fraudulent Practice

No employee or agent or a member of the board shall be involved in a fraudulent practice in any procurement proceedings.

f) Corrupt Practice

No employee or agent or a member of the board shall be involved in any corrupt practice in any procurement proceedings.

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CHAPTER TWO

2.0 INVENTORY CONTROL, STORES MANAGEMENT AND DISPOSAL

2.1 RECEIPT AND INSPECTION AND ACCEPTANCE

Once the supplier delivers the goods, the Inspection shall be done within 2 days. This shall be done under the direction of the Inventory Officer and approved by the Inspection and Acceptance Committee.

A Certificate of Acceptance shall be issued if the goods meet the requirements and goods shall be accepted in the stores.

In case the goods do not meet the requirements, they shall be rejected and given back to the supplier.

2.2 INVENTORY MANAGEMENT

This policy applies to all purchased and stored items for the Corporation.

a) Storage of purchased goods shall be;

- i) Received in Physical Stores and posted to EBS system - inventory
- ii) Stocked systematically according to the stores layout
- iii) Marked to aid identification;
- iv) Items subject to pilferage shall be kept under lock and key.
- v) Items shall be kept free from dust by regular dusting.
- vi) There shall be continuous Stock Checking of stock holding items.

b) Storage of serviceable goods returned to Stores shall be;

- i) Received in Physical Stores from user departments.
- ii) The Inventory Officer shall;
 - Check and confirm the item description and the physical quantity.
 - Post the details of the receipt on the EBS system
 - Stock systematically according to the stores layout.



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c) Stores Security

- i. The Stores Premises shall be under a 24 hour security.
- ii. Inventory Officer shall constantly patrol the Stores Premises.
- iii. The Inventory Officer in charge of stores shall be in charge of ALL Stores keys.
- iv. The Stores Officer shall report any instance of loss of keys to the Supply Chain manager within 24 hours.
- v. The Supply Chain Manager shall retain the duplicate keys for the stores.

d) Stock Verification (Inspection)

Stores Verification shall be done quarterly to ascertain;

- i. The accuracy of Stock records verses the physical items.
- ii. The Supply Chain Manager shall ensure that a program for stock verification is put in place
- iii. The process of stock verification shall be carried out quarterly.
- iv. Whenever necessary, Supply Chain Manager direct commencement of stock verification exercise.

2.3 STOCK ISSUANCE

- User Department raises a Stores Requisition in the EBS System.
- Stores Requisition Form approved by the Supply Chain Manager.
- Goods will be issued on approval of Stores Requisition.
- System generates reports showing all items issued.
- Collection of goods by User Department

2.4 STOCK TAKE

A physical count of stock items shall be carried out by Store Officer under the supervision of Procurement Officer, Audit and Finance Departments. This shall then be compared with the store records for variance and reports prepared.



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e) Stock Taking

- i) The Supply Chain Manager shall initiate the stocktaking process to be conducted quarterly.
- ii) The Annual stock taking shall be conducted jointly by a team of representatives from;
 - Procurement
 - Audit
 - Finance
 - User department, and any other appointed stakeholders.
- iii) The stores shall remain closed during the stock taking period
- iv) The Supply Chain Manager shall forward a copy of the stock taking report to the General Manager Finance and Investments.
- v) No adjustments to the stock records for surplus/shortages revealed during the annual stocktaking shall be done prior to the approval by the Managing Director.
- vi) Stock adjustment for any loss or surplus realized during stocktaking shall be done within two months from the date of completion of annual stocktaking.
- vii) Upon approval by the Managing Director the Corporation depending on the thresholds, adjustment for loss/surplus shall be effected by the Supply Chain Manager.
- vii) The approval for adjustment shall be forwarded to General Manager Finance and Investments for accounting purposes.



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2.5 DISPOSAL OF OBSOLETE/SURPLUS STORES

2.5.1 Identification of items for disposal

Where stores, plant and equipment do become unserviceable as a result of fair wear and tear or become obsolete, surplus or uneconomical to maintain for one reason or another, the Procurement Officer, identifies them and makes a list on the prescribed form giving all details.

Identification of items for disposal should be done regularly, but at least once in each financial year and that the disposal process should not take more than six months after the identification of the items.

The Supply Chain Manager will seek the Managing Director's approval for disposal via Disposal Plan.

2.5.2 Authority to Dispose

The Supply Chain Manager shall a disposal plan and forward to the Managing Director for approval and appointment of an ad hock Disposal Committee. The Disposal Committee pursuant to Section of the Public Procurement and Asset Disposal Act 2015 Section 163 and Regulations 2020 (176) comprising at least five (5) members as follows;

- Officer in charge of finance.
- Head of the procurement unit who shall be the secretary.
- Head of the Administration department.
- Two heads of end user departments, of whom one shall be the head of the end user department disposing of the stores or equipment.

Once the authority is granted, the Supply Chain Manager should prior to convening the Disposal Committee request the relevant Departments to subject the items to technical valuation and submit a written report on all aspects of the items, including condition, and saleable value (where appropriate).

The Disposal Committee should then be convened and requested to physically review the items and form their opinion on them and with assistance of the technical report, recommend on the best method of disposal.



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The Disposal Committee recommendations are then presented to the Managing Director for approval.

2.5.3 Disposal Certificate

When items have been disposed of in accordance with approved recommendations, a Disposal Certificate should be prepared.

At the time of payment for the lots one has won, the financial deposit will be credited to his amount and will be required to pay the balance of the sale price.

Successful candidates must pay for and remove the items within 14 days of the sale.

If a successful candidate fails to accept and/or pay for the item within the 14 days, he/she will immediately forfeit his deposit.



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CHAPTER THREE

3.0 RECORDS MANAGEMENT

3.1 SCOPE

The objective of Records Management as guided by Public Procurement Regulatory Authority is to ensure control, co-ordination; maintenance and the disposal of records are effective and efficient. Except as otherwise provided in these rules all procurement contract documents and instruments executed by or on behalf of the Corporation shall remain in the custody of the

The Procurement Department shall maintain records for a minimum of six (6) years. The documents so maintained shall include but not limited to the following

1. Annual Procurement Plan
2. Disposal plan
3. Requisitions
4. Quotation/Bid Documents
5. Registers
6. Evaluation Reports
7. Professional Opinion
8. Minutes of Opening Tender, Evaluation and Disposal Committee Meetings
9. Letters of Notification
10. Letters of Acceptance/Performance Bonds
11. Contract Documents
12. LPO/LSOs
13. Delivery Notes
14. Goods Received Vouchers
15. Management Reports
16. Board Papers
17. Statutory Reports

Corporation's Registry of which shall be maintained by the Supply Chain Manager.



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3.2 TYPES OF RECORDS

- Transaction files;
- Correspondence files as per classification scheme;
- Registers;
- Agenda Books (Disposal Committees).
- Minutes Files

3.2.1 Transaction file.

Procurement officers are responsible for transaction files until the same is handed over to the registry after raising of Purchase orders.

The following is a checklist of what a complete procurement transaction file should have;

1. Approval to procure;
2. Requisition ;
3. Floating of Quotations Register ;
4. Opening of Quotations Register;
5. Bids from suppliers;
6. Evaluation Report;
7. Evaluation Committee Minutes
8. Secretariat Recommendation Reports
9. Professional Opinion
10. Award and Acceptance Letters;
11. Inspection and Acceptance Report for Goods, inspection certificate and the;

3.2.2 Agenda Item Books

These Agenda Item book is prepared for the Disposal Committee.

4.0 REVIEW OF POLICY

This policy will be reviewed and amended every two years or as necessary.