

IFRS 9 Implementation and Bank Performance in Cambodia during the COVID-19 Pandemic

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1. INTRODUCTION

IFRS 9 Financial Instruments introduced an expected loss model for recognizing loan loss provisions that recognize loan losses earlier than required by the previous standard *IAS 39 Financial Instruments*. Commercial banks in Cambodia were required to follow IFRS 9 starting from January 1, 2019. This chapter analyzes the financial data of 25 banks for the years 2019–2023 to understand the impact of IFRS 9 expected credit losses on bank performance and loan loss provisions. The chapter also provides a historical overview of bank loan provisioning in Cambodia, which may help future researchers understand a shift in Cambodian bank performance subsequent to IFRS 9 adoption in 2019.

The global financial crisis of 2007–2009 saw the implosion of long-standing commercial banks, investment banks, and insurance companies, which had balance sheets inflated with worthless debt investments, especially securitized debt (Acharya *et al.*, 2009). The collapse of these financial institutions was partly due to over-investment in risky financial assets, the losses of which were not recognized by the fair value accounting used at that time (Acharya *et al.*, 2009). Earlier recognition of these losses could have supported institutions in shoring up capital (Gunn *et al.*, 2018).

It was in this context that the International Accounting Standards Board (IASB) developed *IFRS 9 Financial Instruments* to introduce an expected loss model in recognizing the impairment of financial assets, including loan assets. IFRS 9 and its treatment of loan impairment using an expected loss model was intended to recognize it earlier than the incurred loss model under *IAS 39 Financial Instruments* (IFRS Foundation, 2022; Bank for International Settlements, 2017). The introduction of IFRS 9 was welcomed as giving more timely information about the value and status of loan portfolios so that measures could be taken to shore up capital and avoid liquidity crises or credit downgrades that could pose an existential threat to financial institutions (Bank for International Settlements, 2017). However, the intention was

not a risk-averse prudential approach but an approach that “faithfully represents the economic phenomenon of expected credit losses” (IFRS Foundation, 2014).

Banks and financial institutions in Europe and other IFRS jurisdictions began following IFRS 9 for periods beginning on or after January 1, 2018. In contrast, banks in Cambodia were exempt from applying IFRS 9 until the National Bank of Cambodia required IFRS 9 implementation for periods beginning on and after January 1, 2019 (Ministry of Economy and Finance, 2016). This chapter examines the impact of Cambodia’s transition to IFRS 9 on loan impairment recognition in Cambodia. The study compares the loan impairment loss recognition under IFRS 9 with the previous statutory loss recognition. Cambodia provides a unique opportunity to examine the impact of both IFRS 9 on the transition from statutory provisions and the application of IFRS 9 during a time of stress for banks, the 2020–2023 COVID-19 public health emergency a period of economic distress.

1.1 Regulatory and Accounting Context

Whereas some countries went through a process of harmonizing national accounting standards with IFRS, with many ultimately adopting IFRS, Cambodia never had its own national accounting or financial reporting standards before the initial introduction of IFRS by the National Accounting Council in 2003 (Ministry of Economy and Finance, 2003). In introducing IFRS to Cambodia, the Ministry of Economy and Finance of Cambodia signed a copyright agreement with the IFRS Foundation to use IFRS in Cambodia, renaming the IAS and IFRS standards “Cambodian Accounting Standards” (CAS) and “Cambodian International Financial Reporting Standards” (CIFRS). Individual CAS and CIFRS were copied from IAS and IFRS without modification. Still, in the initial 2003 requirement for large and medium-sized entities to follow CAS and CIFRS, only fifteen IASs were adopted for Cambodia (Ministry of Economy and Finance, 2003). In 2008, the number of standards was increased to twenty-two, two IFRS and twenty IASs (Table 2.1). These standards purposely omitted IAS 39, which the National Accounting Council concluded would have been challenging for financial institutions to implement and, therefore, an obstacle to introducing standards.

In 2009, the Cambodian Ministry of Economy and Finance, in its Ministry Order No. 68, adopted full and complete IFRS as CIFRS, including all amendments thereof (Ministry of Economy and Finance, 2009). In the same year, the Ministry of Economy and Finance, through Notification 097/09, stated that banks were required to follow full IFRS/CIFRS for periods beginning on or after January 1, 2012 (Ministry of Economy and Finance, 2009). However, in 2012, some banks were ready to implement full IFRS, whereas others were not. As a result, in July 2012, the

National Accounting Council decided to delay the implementation of IFRS/CIFRS for financial institutions until 2016 (Ministry of Economy and Finance, 2012). Again, in 2016, the National Accounting Council made a final delay in implementing CIFRS until periods beginning on or after January 1, 2019 (Ministry of Economy and Finance, 2016).

Table 2.1: Cambodian Accounting Standards in 2008 and their IFRS Equivalents

<i>CAS/CIFRS</i>	<i>IAS/IFRS</i>	<i>Title</i>
CAS 1	IAS 1	Presentation of Financial Statements
CAS 2	IAS 2	Inventories
CAS 7	CAS 7	Accounting Policies, Changes in Accounting Estimates and Errors
CAS 8	CAS 8	Accounting Policies, Changes in Accounting Estimates and Errors
CAS 10	CAS 10	Events after Balance Sheet Date
CAS 11	CAS 11	Construction Contracts
CAS 12	CAS 12	Income Taxes
CAS 16	CAS 16	Property, Plant, and Equipment
CAS 17	CAS 17	Leases
CAS 18	CAS 18	Revenue
CAS 21	CAS 21	The Effects of the Changes in Foreign Rates
CAS 23	CAS 23	Borrowing Costs
CAS 24	CAS 24	Related Party Disclosures
CAS 27	CAS 27	Consolidated and Separate Financial Statements
CAS 37	CAS 37	Provisions, Contingent Liabilities and Contingent Assets
CAS 38	CAS 38	Intangible Assets
CAS 40	CAS 40	Investment Property
CAS 41	CAS 41	Agriculture
CFRS 4	CFRS 4	Insurance Contracts
CFRS 7	IFRS 7	Financial Instruments: Disclosures

Sources: Order 97/09 and Order 221, Ministry of Economy and Finance, 2008

Since January 1, 2019, all commercial banks in Cambodia have followed full CIFRS, though some early adopted CIFRS starting in 2018. Before 2018 and 2019, commercial banks in Cambodia implemented the twenty-two CAS and CIFRS

(Table 2.1), which excluded IAS 39. In the absence of IAS 39 or equivalent, commercial banks accounted for loans and loan impairment in accordance with the National Bank of Cambodia statutory loan provisioning.

The 2008 global financial crisis was a catalyst for the National Bank of Cambodia to increase statutory provisions. In 2000, statutory provisions for bank loans had been set at 20 percent of sub-standard loans, 50 percent of doubtful loans, and 100 percent of “loss” loans (National Bank of Cambodia, 2000). Just two years later, the National Bank of Cambodia decreased these provisions. From 2002 until 2009, the statutory provisions were 10 percent of substandard loans, 30 percent of doubtful loans, and 100 percent of “loss” loans, subject to adjustments for the value of collateral (National Bank of Cambodia, 2002). However, the statutory provisions dramatically increased in 2009 (Table 2.2) as required by the 2009 National Bank of Cambodia *Order on Asset Classification and Provisioning in Banking and Financial Institutions* and the 2017 National Bank of Cambodia *Order on Credit Risk Grading and Impairment Provisioning*. National Bank of Cambodia Guidance No. 001, implementing the 2017 order, set the statutory non-performing loan provisions as a fixed percent of loans according to days past due (Table 2.2) (National Bank of Cambodia, 2017). These 2017 provision categories and amounts were unchanged from the 2009 statutory provision requirements. The 2017 provision categories remain in force and are used for prudential reporting, capital requirements, and tax purposes.

Table 2.2: National Bank of Cambodia Statutory Provisions for Commercial Bank Lending

	<i>Long term credit original term of more than one year Ministry Order 017-344, Article</i>	<i>Short term credit original term of one year or less Guidance No. 001, Article 7</i>	
<i>Statutory Classification Grade</i>	<i>Days Past Due</i>	<i>Days Past Due</i>	<i>Regulatory Provision</i>
Normal	Less than 29 days	Less than 15 days	1% of gross loans
Monitoring	30–89 days	15 to 30 days	3% of gross loans
Substandard	90–179 days	31 to 60 days	20% of gross loans
Doubtful	180–359 days	61 to 90 days	50% of gross loans
Loss	360+ days	91 days and above	100% of gross loans

Source: National Bank of Cambodia, 2009; National Bank of Cambodia, 2017

From 2019 onwards, commercial banks discontinued using the National Bank statutory provisioning to determine their loan impairment expense for accounting

purposes, replacing it with the requirements of IFRS 9. However, the statutory provision is still an important metric used by the National Bank of Cambodia. The National Bank of Cambodia uses the statutory provision as a basis for the minimum capital required of banks; if the provision increases, commercial banks also must maintain or contribute additional capital. The tax authorities also use the National Bank of Cambodia statutory provision to determine taxable income. Cambodian Ministry of Economy and Finance Order 578 on Income Tax, dated September 19, 2024, Article 27, allows provisions for bad debts to be deducted from taxable income for substandard, doubtful, and written-off loans only in accordance with the National Bank of Cambodia regulations (Ministry of Economy and Finance, 2024). Thus, because CIFRS 9 basis loan impairment expense is not used by the bank regulator or the tax authorities, the main role of CIFRS 9 basis loan impairment expense is communicating performance and financial position to management, shareholders, depositors, and the public.

IFRS 9 requires a holistic assessment of the risk and recoverability of a loan, in contrast to the statutory provisioning, which only looks at days past due. As per IFRS 9, paragraph 4.1.2, loans issued by a commercial bank are accounted for at amortized costs if the bank intends to collect the contractual cash flows of principal and interest (IFRS Foundation, 2025).

Table 2.3: IFRS 9 Expected Credit Loss (ECL) Allowance for Commercial Bank Lending

<i>Loan Classification</i>	<i>ECL Allowance</i>
Credit risk has not significantly increased since the initial recognition	12-month expected credit losses (i.e., loss given default within 12 months)
Credit risk has significantly increased since the initial recognition	Lifetime expected credit losses (i.e., loss given default over the life of the loan)

Source: IFRS 9, paragraphs 5.5.5 and 5.5.3, IFRS Foundation, 2025

The two classifications of loans under IFRS 9 focus on changes in credit risk, which is forward-looking. The allowance measurement is also forward-looking, requiring lenders to estimate the probability of default. IFRS 9, paragraph 5.5.11, directly contrasts with the approach required for statutory provisions, stating that “an entity cannot solely rely on past due data” (IFRS Foundation, 2025). The guidance for measuring expected credit losses in IFRS 9 Appendix B notes a broad range of indicators of impairment, including changes in macroeconomic factors (paragraph B5.5.14) and collateral type and value (paragraph B5.5.5).

The expected credit loss approach under IFRS 9 was a significant methodological and conceptual departure from the incurred loss method under the previous standard,

IAS 39 Financial Instruments: Recognition and Measurement. Under IAS 39, loans were categorized as “loans and receivables,” accounted for using the amortized cost method. Loans and receivables under IAS 39 were impaired only when there was “objective evidence of impairment as a result of one or more events” (IAS 39, paragraph 59). IAS 39 gave examples of objective evidence, including default, concessions to borrowers, financial difficulty of the issuer, and breach of contract (IAS 39, paragraph 59). Whereas IFRS 9 requires anticipation of future default, the objective evidence required by IAS 39 emphasizes the borrower’s current and past financial difficulty. Indeed, the intention of IFRS 9 was to recognize impairment losses sooner rather than later.

The next section of this chapter reviews relevant literature and develops hypotheses. This is followed by the presentation of the study methodology, results, and discussion to understand the shift in Cambodian bank performance that occurred after the adoption of the IFRS 9 in 2019.

2. LITERATURE AND HYPOTHESES

IFRS 9 Financial Instrument was designed to recognize loan impairment earlier than later compared to IAS 39. The effects of the transition to IFRS 9 have been studied among European banks. In the United Kingdom, the transition to IFRS 9 resulted in banks increasing loan provisions by 16–58 percent but had less impact on recognition of loan impairment expense (Deloitte, 2019). A study of 107 European banks also identified a significant increase in loan loss provisions on the transition to IFRS 9 (Neisin & Schulte-Mattler, 2021). This is consistent with an international study of 149 listed banks in G20 countries, which found credit impairment to be larger and more conservative under IFRS 9 (Lima Rebeiro *et al.*, 2024).

However, Cambodia’s transition to IFRS 9 was unique. In contrast to other countries that had followed a less conservative IAS 39 prior to IFRS 9, Cambodia had been following more strict statutory loan loss provisions, which required significant provisions regardless of any recovery through the sale of collateral (National Bank of Cambodia, 2017). On transition to IFRS 9, Cambodian banks could, for the first time, consider collateral and future expected collections when determining loan impairment expenses, reducing the size of impairment expenses. This leads to our first hypothesis:

H1: Commercial bank loan impairment expense is lower under IFRS 9 than under the National Bank of Cambodia statutory impairment expense.

Cambodian banks implemented IFRS 9 in 2019, which was followed by the COVID-19 pandemic starting in 2020. A commercial bank with poor performance

in a challenging period, such as the COVID-19 pandemic, might be pressured to manipulate its loan impairment expense to increase profits. Manipulation of loan loss provisions under IFRS 9 is possible due to the use of judgment required. A study of 5,147 listed and unlisted European banks found that during the COVID-19 pandemic, banks manipulated their loan loss provisions (Allini *et al.*, 2023). The authors also found greater manipulation among listed banks (Allini *et al.*, 2023).

Most commercial banks in Cambodia publish public audited financial reports. A loss or significant drop in profits could attract negative publicity and put a bank's financial stability into question, making it challenging to attract depositors. Therefore, banks may be under competitive pressure to show higher profits to project financial soundness and give confidence to potential depositors and clients.

However, in contrast to banks in other countries, such as those in Europe, IFRS 9 expected credit losses of banks in Cambodia have little effect on regulatory capital requirements. Regulatory bank capital in Cambodia is based on the higher of the IFRS 9 loan loss provision and statutory loan loss provision. The statutory loan loss provision is usually higher, so in this case, the size of the IFRS 9 loan loss provision does not influence the need for a bank to raise additional capital. There would be little motivation for a bank to decrease its loan losses for these purposes.

Also, the IFRS 9 expected credit losses of Cambodian banks do not affect taxable profit. Cambodian tax law only allows for the deduction of the National Bank of Cambodia statutory loan impairment losses. In contrast, the IFRS 9 loan impairment expense cannot be deducted from taxable profit. Thus, there is no motivation for a bank to increase its IFRS 9 loan losses for tax purposes.

Given the competitive advantage of showing a better performance by recognizing smaller IFRS 9 loan loss provisions, and given the absence of motivation to recognize larger IFRS 9 loan loss provisions, we predict the management of IFRS 9 loan loss provisions to increase profits, and we develop the following two hypotheses:

H2: The ratio of loan impairment expense to total gross loans receivable is smaller in years of declining profits.

H3: A decline in bank profits leads to a decrease in the ratio of loan impairment expense to total gross loans receivable.

3. METHODOLOGY

3.1 Data Sources and Sample

The study uses financial information from two main sources. First, it utilizes the information about individual commercial bank statutory loan impairment expenses

as reported in the annual supervision reports of the National Bank of Cambodia. Secondly, it collects IFRS-based financial information from the public financial reports of commercial banks in Cambodia. To ensure comparability and completeness, the study includes only commercial banks that operated in Cambodia for the years 2019–2023, and 2019 was chosen as the starting year because it is the first year that IFRS 9 was mandatory for all commercial banks. The final year, 2023, was selected because, at the time of this study, most commercial banks had published their 2023 annual financial report, but few had made available their 2024 financial report.

Of the population of 58 licensed commercial banks in Cambodia as per the 2023 Supervision Report of the National Bank of Cambodia, several banks were omitted because they had changed legal form, which affected their financial reporting basis; several were omitted because they commenced lending activities only after 2019, and several were omitted because they did not publicly disclose financial reports for their Cambodian operations for one or more years (Appendix 1). After omitting banks with incomplete or incomparable data, the study was left with a final 25 commercial banks with both financial reporting data and National Bank non-performing loan data available for analysis for the period 2019–2023.

3.2 Data Analysis

To test hypothesis H1, we first conducted a paired samples two-tailed test of means to determine whether the IFRS 9 impairment is significantly lower than the statutory impairment for the years 2019–2023. However, due to the non-normality of the data, we proceeded to conduct a Wilcoxon-signed rank test. To test hypothesis H2, we

Table 2.4: Regression Variables

<i>Dependent Variable</i>	
Loan impairment ratio	The ratio of IFRS 9 basis loan impairment expense divided by total gross loans receivable.
<i>Independent Variables</i>	
Growth in profit before tax and loan impairment	Annual growth measured as: (profit before tax and loan impairment expense for the year/profit for the previous year) – 1
GDP growth	Real GDP growth for the year, as reported by the International Monetary Fund
Loan growth	Growth in gross loans receivable
Statutory non-performing loans	Total non-performing loans, as reported by the National Bank of Cambodia supervision reports

again performed a paired samples two-tailed test of means for the years 2019–2023. Finally, to test hypothesis H3, we conducted ordinary least squares regression with the variables shown in Table 2.4 for each commercial bank for each of the years 2019, 2020, 2021, 2022, and 2023 omitted for the reason described above. We utilized SPSS to conduct data analysis.

4. RESULTS

To test the first hypothesis, we conducted a one-tailed pair samples t-test to determine whether the IFRS 9 impairment expense for commercial banks is significantly lower than the statutory impairment expense for the same years (Table 2.5). The results show that the IFRS 9 impairment expense was significantly lower, with an average of \$5.47 million, compared to the statutory impairment expense that had a mean value of \$7.34 million.

Table 2.5: H1 Paired Test of Means Comparing IFRS 9 Impairment Expense and Statutory Impairment Expense

<i>Variable</i>	<i>Mean (USD)</i>
IFRS 9 Impairment Expense (n = 125)	\$4,842,169
Statutory Impairment Expense (n = 125)	\$9,861,438
t-score	−3.894
Two-tailed p-value	0.001***

Note: ***Significant at a 1 percent level (two-sided)

However, A normality assessment was conducted using the Kolmogorov-Smirnov (K-S) and Shapiro-Wilk tests, with results indicating that both IFRS impairment and NBC impairment significantly deviated from normality. Therefore, a Wilcoxon Signed-Rank Test was used to compare IFRS and statutory impairment expense (Table 2.6). The Wilcoxon Signed-Rank Test assessed whether the median difference between the two impairment measures was significantly different from zero. Results

Table 2.6: Related Samples Wilcoxon Signed Rank Test

Total N	125
Test Statistic	5,830
Standard Error	671
Standardized Test Statistic	4.663
Asymptotic Sig. (2-sided test)	<.001

indicated a statistically significant difference between IFRS 9 impairment expense and the statutory impairment expense, implying that banks report impairment expenses significantly differently under IFRS 9 compared to statutory impairment requirements.

To test hypothesis H2, we conducted an independent samples t-test comparing the average loan impairment ratio in years of declining profits with the average loan impairment ratio in years of increasing profits. The loan impairment ratio was calculated using IFRS 9 basis figures reported in the public audited financial reports of the commercial banks. The measure for profit growth also used the IFRS 9 basis figures from the public financial reports of the banks, measured as the growth in profit before tax and loan impairment in a given year compared to the previous year. If the profit increased compared to the previous year, we classified the figures for that year as a “year of increasing profit,” if the profit declined, we classified the figures for that year as a “year of declining profits.” There were 51 cases of an annual decline in profit between 2019–2023 and 74 cases of a yearly increase in profit between 2019–2023.

The average loan impairment ratio in years of declining profits was significantly higher than in years of increasing profits (Table 2.7). As our hypothesis was directional, a one-sided p-value was used, and the result was significant at a 1.3% significance level.

Table 2.7: Average Loan Impairment Ratio in Years of Declining Profits Compared to Average Loan Impairment Ratio in Years of Increasing Profits

<i>Variable</i>	<i>Mean</i>
Loan impairment ratio in years of declining profits (n = 51)	0.8122%
Loan impairment ratio in years of increasing profits (n = 74)	0.3041%
t-score	2.275
One-sided p-value	0.013

Note: Equal variances are not assumed because Levene’s test is 7.585 with a significance of .007.

To test hypothesis H3, we conducted multiple regression with the loan impairment ratio (LIR) as the dependent variable (Table 2.8). The results show a consistent and strong significant negative relationship between growth in profit and the loan impairment ratio, contradicting our proposed hypothesis.

Table 2.8: Regression Analysis with Loan Impairment Ratio (LIR)
as the Dependent Variable

<i>Variables</i>	<i>Model 1</i>	<i>Model 2</i>	<i>Model 3</i>	<i>Model 4</i>
Growth in profit before tax and loan impairment	-0.271***	-0.260***	-0.261***	-0.262***
GDP growth		-0.224	-0.225*	-0.224*
Loan growth			0.023	0.023
Statutory non-performing loans				-0.007
Constant	0.538	0.762	0.750	0.754
Observations	125	125	125	125
R-squared	0.074	0.123	0.124	0.124
Adjusted R Square	0.066	0.109	0.102	0.095
VIF [†]	1.000	1.003	1.011	1.017
Regression model p-value	<.001	<.001	<.001	0.003

Note: ***Significant at a 1 percent level, **Significant at a 5 percent level, *Significant at a 10 percent level

[†]The VIF value is the largest VIF value across all independent variables.

5. DISCUSSION AND CONCLUSION

We find that IFRS 9 improved bank profitability in line with our expectations. The results of this study confirm our hypothesis (H1) that IFRS 9 resulted in lower loan impairment expense, making banks more profitable than if they had recognized the higher statutory loan impairment expense. This is in contrast to the experience of other countries, where the transition to IFRS 9 resulted in larger loan loss provisions. The reason is likely the unique regulations in Cambodia, that Cambodian banks did not transition to IFRS 9 from IAS 39 but instead transitioned from a more strict statutory requirement for recognizing loan loss provisions. Therefore, the transition to IFRS 9 improved the reported profits of banks in Cambodia.

Contrary to expectations, we did not find evidence of manipulation of IFRS 9 loan loss provisions despite the financial pressure on banks during the economic slowdown caused by the COVID-19 pandemic. Our analyzes contradicted our hypotheses H2 and H3, that banks managed IFRS 9 loan loss provisions to show better performance during periods of declining profit. We found no evidence of manipulating IFRS 9 loan loss provisions to show a better profit. This may be due to Cambodian banks' commitment to compliance, adequate regulatory supervision by the National Bank of Cambodia, and the influence of effective independent audits by

competent, licensed audit firms. In addition, the supposed competitive advantage of reporting higher profits may be limited.

An interesting observation from our study is that the statutory non-performing loan loss provision is negatively correlated with the loan impairment ratio calculated in accordance with IFRS 9. This suggests that the statutory method of calculating loan loss provisions may be inaccurate and, therefore, inefficient. The statutory method for calculating loan loss provisions should be further studied for improvement. Because the statutory provision is used for setting capital requirements, an improvement in the measurement of the statutory loan loss provision will also make bank capital more efficient, leading to economic benefits.

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APPENDIX 1**List of All 2023 Licensed Commercial Banks in Cambodia**

<i>No.</i>	<i>Bank Name</i>	<i>Included in Study</i>	<i>Reason for Exclusion from the Study</i>
1.	ACLEDA Bank Plc.	Yes	
2.	Advanced Bank of Asia Limited	Yes	
3.	Bangkok Bank, Cambodia Branch	Yes	
4.	Bank of China (Hong Kong) Limited Phnom Penh Branch	Yes	
5.	Booyoung Khmer Bank	Yes	
6.	BRED Bank (Cambodia) Plc.	Yes	
7.	Cambodia Asia Bank Ltd.	Yes	
8.	Cambodian Public Bank Plc.	Yes	
9.	Canadia Bank Plc.	Yes	
10.	Cathay United Bank (Cambodia) Co., Ltd.	Yes	
11.	CIMB Bank Plc.	Yes	
12.	Foreign Trade Bank of Cambodia	Yes	
13.	Hong Leong Bank (Cambodia) Plc	Yes	
14.	J Trust Royal Bank Plc.	Yes	
15.	Maybank (Cambodia) Plc.	Yes	
16.	MB Bank (Cambodia) Plc.	Yes	
17.	Mega International Commercial Bank Co., Ltd Phnom Penh Branch	Yes	
18.	Phillip Bank Plc.	Yes	
19.	Prince Bank Plc.	Yes	
20.	RHB Bank (Cambodia) Plc.	Yes	
21.	Saigon Thuong Tin Bank (Cambodia) Plc.	Yes	

<i>No.</i>	<i>Bank Name</i>	<i>Included in Study</i>	<i>Reason for Exclusion from the Study</i>
22.	Saigon-Hanoi Bank Cambodia Plc.	Yes	
23.	Sathapana Bank Plc.	Yes	
24.	Shinhan Bank (Cambodia) Plc.	Yes	
25.	Union Commercial Bank Plc.	Yes	
26.	Agricultural and Rural Development Bank	No	100% government-owned bank; was excluded from the NBC supervision report for the years 2018 and 2019
27.	Cambodian Commercial Bank Plc.	No	Absence of NBC supervision report NPLs in 2019
28.	Vattanac Bank	No	Absence of NBC supervision report NPLs in 2019
29.	B.I.C (Cambodia) Bank Plc.	No	Absence of NBC supervision report NPLs in 2019–2020
30.	Heng Feng (Cambodia) Bank Plc.	No	Absence of NBC supervision report NPLs in 2019–2023
31.	Alpha Commercial Bank Plc.	No	Absence of NBC supervision report NPLs in 2019–2023
32.	CCU Commercial Bank Plc.	No	Absence of NBC supervision report NPLs in 2019–2023
33.	Branch of Mizuho Bank, Ltd.	No	Absence of NBC supervision report NPLs in 2019–2023
34.	Chip Mong Commercial Bank Plc.	No	Absence of NBC supervision report NPLs in 2019, 2020
35.	ICBC Limited Phnom Penh Branch	No	Absence of NBC supervision report NPLs in 2019, 2020
36.	Chief (Cambodia) Commercial Bank Plc.	No	Absence of NBC supervision report NPLs in 2019, 2020
37.	Branch of Industrial Bank of Korea	No	Absence of NBC supervision report NPLs in 2019, 2020, 2021
38.	Asia-Pacific Development Bank Plc.	No	Absence of NBC supervision report NPLs in 2019, 2020, 2021
39.	Heng He (Cambodia) Commercial Bank Plc.	No	Absence of NBC supervision report NPLs in 2019, 2020, and 2021 and incomplete data financial information from annual reports

<i>No.</i>	<i>Bank Name</i>	<i>Included in Study</i>	<i>Reason for Exclusion from the Study</i>
40.	Small and Medium Enterprise Bank of Cambodia Plc. “SME Bank”	No	Absence of NBC supervision report NPLs in 2019, 2020, and 2021 and unavailable financial data from the bank annual report
41.	Wing Bank (Cambodia) Plc.	No	Absence of NBC supervision report NPLs in 2019 and 2020
42.	Taiwan Cooperative Bank, Phnom Penh Branch	No	Absence of NBC supervision report NPLs in 2020, 2021
43.	Krung Thai Bank Public Co., Ltd Phnom Penh Branch	No	Absence of NBC supervision report NPLs in 2022 and 2023
44.	Branch of Kasikorn Bank Public Company Limited	No	Absence of NBC supervision report NPLs in 2019, 2020, 2023
45.	KB Prasac Bank Plc.	No	Complete comparable data not available due to bank merger in 2022
46.	DGB Bank Plc.	No	Explanatory notes disclosed expected credit losses not available in the public financial report
47.	Woori Bank (Cambodia) Plc.	No	Lack of reported loan impairment provisions in 2019, 2020
48.	Bank for Investment and Development of Cambodia Plc.	No	No disclosure of expected credit loss provision in public financial reports for the years 2018 and 2019
49.	Cambodia Post Bank Plc.	No	Public financial reports for 2018 and 2019 are not available
50.	First Commercial Bank Phnom Penh Branch	No	Public financial reports for Cambodian banking operations are not available
51.	Phnom Penh Commercial Bank Plc.	No	Public financial reports unavailable for the years 2019 – 2021
52.	Rui Li (Cambodia) Bank Plc.	No	Public financial reports unavailable for the years 2019–2023
53.	Vietnam Bank for Agriculture and Rural Development Cambodia Branch	No	Public financial reports unavailable for the years 2019–2023
54.	Bridge Bank Plc.	No	The bank became a commercial bank in 2022

<i>No.</i>	<i>Bank Name</i>	<i>Included in Study</i>	<i>Reason for Exclusion from the Study</i>
55.	Hattha Bank Plc.	No	The bank received its commercial banking license in 2020
56.	SBI Ly Hour Bank Plc.	No	The bank was licensed in 2019
57.	Panda Commercial Bank Plc.	No	The bank was licensed in 2020
58.	Oriental Bank Plc.	No	The bank was licensed in 2022

Sources: Supervision Report, National Bank of Cambodia, 2016; Supervision Report, National Bank of Cambodia, 2018; Supervision Report, National Bank of Cambodia, 2020