



Cambodian Pocket Tax & Corporate Guide
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PAT Professional Limited

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The Cambodian Pocket Tax & Corporate Guide is in accordance with the current tax law and regulation and other relevant corporate registrations as of 1 May 2017.

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Tax rate

Taxable profit must be calculated on an annual basis by adjusting accounting profit for disallowable expenses or exempt forms of income, and taking into account of any allowable tax losses available in accordance with the Cambodian Law on Taxation ("CLOT"). Profit tax is applied as follows:

Large and Medium taxpayers:

Activities	Rate (%)
Standard rate including insurance activities except the activities below.	20
Oil or natural gas production and exploitation activities such as timber, ore, gold and precious stones	30
Qualified investment projects (during exempted periods)	0
Property or other risks insurance or re-insurance (on Premium)	5

(Effective 2017)

Small taxpayer, resident individual, sole proprietorship, and partially benefits provided to each of partnership, the rate is subject to the progressive as below:

Taxable profit	Rate (%)
From 0 riel to 12 million riels (Approximate: USD 3,000)	0
From 12 million riels to 18 million riels (Approximate: USD 3,000 to USD 4,500)	5
From 18 million riels to 102 million riels (Approximate: USD 4,500 to USD 25,500)	10
From 102 million riels to 150 million riels (Approximate: USD 25,500 – USD 37,500)	15
Above 150 million riels (Approximate: above USD 37,500)	20

(Effective 2017)

Scope of tax on profit

Tax on profit (“ToP”) is applied to the three types of real regime tax payers such as large, medium and small. However, tax rule is differently applied between the small and the large/the medium. For the difference, our presentation will distinguish in the main topic of small taxpayers (*Prakas 1819 MoEF dated 25 December 2015*).

Rule of income

Income results from all types of operations is subject to ToP and mainly include:

- # Capital gains realized from business operations or at the close of the business
- # Interest, rental and royalty income
- # Income from immovable, financial or investment properties
- # Sales of goods and supplies of services
- # Apply to goods or services for personal use and gifts (free goods)
- # Sales of scrap and waste
- # Use of fixed assets for free of charge
- # Other income such as insurance compensation, compensation for damage, and forgiven debt.
- # Others...

The real regime enterprise must comply with the general rules of accounting. For the purposes of ToP, an income must be reported in the period in which it is earned whether it is already paid or not.

Exempted income

- a) The income of the Royal Government and institution of the Royal Government
- b) The income from any organization that are:
 - # Organized and operated exclusively for religious, charitable, scientific, literary, or educational purposes
 - # No part of the assets or earnings are used for any private interest.
- c) The income of any labor organization, or any chamber of commerce industry, or agriculture.

Rule of expenditure

A deductible expense is a charge or expense which the taxpayer is paid or incurred in the tax year to carry on the business and which does not cause the conclusion of the fixed assets of the business or elimination from the liabilities of a debt.

Type of expenditure	Deductible/non-deductible
# Expense pertaining to previous periods	Non-deductible
# Accrued expenses	# Recorded – deductible # Not recorded – Non-deductible for the next tax period
# Expense of subsequent periods	Non-deductible
# Prepayment	Deductible only from the results of the period in which this expense is actually incurred
# Personal expense	Non-deductible
# Expense which does not cause a decrease of the net-assets	Non-deductible
# Accrued salary expenses	Non-deductible if the payment is more than 60 days of the following tax year
# Preliminary and formation expenses	# Deductible either those expenses arise or at the amortization of two (2) year periods # Non-deductible if the amortization is more than two (2) years

Type of expenditure	Deductible/non-deductible
# Amusement, recreation and entertainment	Non-deductible
# Interest expenses	<ul style="list-style-type: none"> # Non-deductible- the rate of interest over than the limitation notified by General Department of Taxation (Yearly basis) # Deductible – 50% of the adjusted profit without taking into account of any interest income or expense, plus the interest income # Carrying forward for the allowed interest expenses by tax if it could not deduct in the current tax year.
# Penalties and interest on penalties	Non-deductible
# Loss on sale of property between related parties	Non-deductible
# Provisions	Non-deductible
# Tax which is paid in contrary with the CLoT e.g., paid on behalf of recipients	Non-deductible
# Charitable contribution	<ul style="list-style-type: none"> # Deductible – limited to 5% of the adjusted profit before the charitable contribution # Could not carry forward the remaining
# Loss on claim	Deductible with proper evidence

Type of expenditure	Deductible/non-deductible
<ul style="list-style-type: none"> # Unpaid expenses with related parties 	Deductible if it is paid within 180 days after the end of the tax year except a deductible outlay or expense for inventory, and capital property, plant and equipment.
<ul style="list-style-type: none"> # Write off expense with related parties 	Non-deductible
<ul style="list-style-type: none"> # Depreciation 	Deductible based on the rule of CLoT: <ul style="list-style-type: none"> # Class 1: Building and structure – 5% straight line # Class 2: Computers, electronic information systems, data handling – 50% declining # Class 3: Automobiles, trucks, office furniture and equipment – 25% declining # Class 4: other tangible assets – 20% declining # Intangible with no specific useful life – 10% straight line # Intangible with a specific useful life – Over its useful life with straight line method # Special depreciation for QIPs – 40% in the first year of the use of assets in addition to the normal tax depreciation charge
<ul style="list-style-type: none"> # Provisions for bad debt for the bank and financial institution. 	<ul style="list-style-type: none"> # Substandard loan – 20% of gross loan # Doubtful loan – 50% of gross loan # loss – 100% of gross loan

Type of expenditure	Deductible/non-deductible
<ul style="list-style-type: none"> # Provisions of bad debt for micro-finance institution 	<ul style="list-style-type: none"> # Doubtful loan – 30% of gross loan # loss – 100% of gross loan

Rule of losses utilization

Taxpayers may carry forward its business's losses for five year times. The accumulated tax losses can be carried forward if all the following conditions are met:

- # There is no change in the business activities of the entity
- # There is no change in the ownership of the entity
- # The losses are recorded in the tax return that has been submitted to the tax administration within the period as mentioned in the tax provisions; and
- # The tax administration has not issued any unilateral tax reassessment for any of the tax years.

Prepayment of profit tax (“PPT”)

PPT is equal to 1% of monthly turnover inclusive of all taxes except VAT. This prepayment tax is made monthly basis and offset against the Minimum Tax or ToP.

During the Tax holidays, QIPs, the taxpayer is also exempted from the prepayment obligation. However, a nil monthly tax return has to be lodged.

Minimum tax (“MT”)

MT is equal to 1% of annual turnover inclusive of all taxes except VAT.

Taxpayer is subject to MT or ToP, whichever is higher. The greater amount shall be compared with the PPT. If PPT exceeds, the exceeded amount shall be carried forward to the next tax period, otherwise the taxpayer requires to pay extra for the remaining amount.

Transfer pricing

The tax administration may access to the transfer pricing between the related parties by applying the arm's length principle due to there is no formal transfer pricing regulations in Cambodia.

The reassessment might be affecting the ToP, PPT, MT, withholding tax and value added tax.

No deduction is available for certain losses incurred in dealing between 51% commonly owned parties.

Types of real regime

- 1) Small taxpayers are individual enterprise or partnership which:
 - # The annual turnover starting from 250 million riels (Approximate: USD 62,500) to 700 million riels (Approximate: USD 175,000)
 - # The three-months turnover starting from 60 million riels (Approximate: USD 15,000) onward
 - # The estimation of three-months turnover starting from 60 million riels (Approximate: USD 15,000) onward
 - # Bidding price, consult fees in providing goods or services including taxes on goods with Government institution

- 2) Medium taxpayers which:
- # The annual turnover of an enterprise starting from 700 million riels (Approximate: USD 175,000) to 2,000 million riels (Approximate: USD 500,000)
 - # Registered enterprise as legal person
 - # Sub national government institute, community, and not for profit organization
- 3) Large taxpayers which:
- # The annual turnover of an enterprise starting from 2,000 million riels (Approximate: USD 500,000) onward.
 - # Branch of foreign company
 - # Qualified investment project
 - # Government institution, embassy, international organization, technical cooperation agency.

(Prakas 1819 MoEF dated 25 December 2015)



Scope of tax on salary

Tax on salary ("ToS") is a monthly tax imposed on an individual's incomes have been received within the framework of fulfilling employment activities.

Both resident and non-resident are subject to ToS with different rates and sources of income.

Employment

An individual is considered as an employee and therefore subject to ToS unless s/he meets two (2) of the following criteria:

- 1) S/he has no risk of not being paid for a fulfilled employment service
- 2) S/he is unable to fix the time and place of rendering the employment activity
- 3) S/he is not required to invest significant and necessary assets to render the activities
- 4) S/he does not supply service to several recipients simultaneously.

Term of employer includes government institution, resident legal person, resident pass-through, permanent establishment in Cambodia, not for profit organization, or any resident physical person carrying on a business.

Residency

An individual is considered a resident for tax purposes if s/he meets one of the following criteria:

- 1) Having a residence in Cambodia (e.g. rent or lease a house or apartment or dormitory in Cambodia) or
- 2) Having a principal place of abode in Cambodia (e.g. economic center, bank accounts, and the place where the employee's family stay in Cambodia) or
- 3) Having presented in Cambodia for more than 182 days of any period of twelve (12) months ending in the current tax year.

Source of income

Cambodian source salary means salary received within the framework of fulfilling an employment activity in the Kingdom of Cambodia. As for the salary received by a non-resident for furnishing technical assistance it shall be treated as from sources in the country where the payer of such income resides.

All income that is not Cambodian sources of income as stated above is treated as foreign source of income.

Taxable salary

Term of salary defined by the CLoT includes remunerations, wages, bonuses, overtime, compensations and fringe benefits which are paid to an employee, or which are paid for the direct or indirect advantage of an employee for the fulfillment of an employment activity.

Non-taxable salary

An income of the following person and activities is exempt from ToS:

- ✦ The salary of diplomatic and foreign officials who work with international organization and technical cooperation agency of other foreign government contracted by head office or the Organization
- ✦ The refund for business expenses incurred by employee which is neither exaggerated nor extravagant
- ✦ The payment of indemnity of the layoff within the limit as provided by Labor Law
- ✦ The payment of social security contribution and the additional remuneration in the kind of social characteristics where there is provision in Labor Law
- ✦ Provision of gratis or below acquisition cost of special uniforms or professional equipment
- ✦ Flat allowance for mission and travel expenses.

Deductions

Any residential employee with minor dependent children at the time of tax payment is allowed to reduce from the tax base of KHR 150,000 (Approximately USD 37.50) per each child per month. In addition, tax allows to deduct from the tax base of the same amount for one spouse.

Non-resident is not allowed to deduct any minor children or spouse.

Tax rates

A physical person resident in the Kingdom of Cambodia for the purpose of tax is liable to the ToS for Cambodian source salary and foreign source salary at the following progressive rate:

KHR – From – To	Approximately to USD – From – To	Tax rate
0 - 1,000,000 **	0 - 250	0%
1,000,001 - 1,500,000	250 - 375	5%
1,500,001 - 8,500,000	375 - 2,125	10%
8,500,001 - 12,500,000	2,125 - 3,125	15%
12,500,001 onward	3,125 onward	20%

** New range is effective from 1 January 2017

A non-resident physical person is liable to the ToS for Cambodian source salary only at the flat rate of 20%.

Fringe benefit tax

Fringe benefits include goods, services or cash benefits or other things that the employer gives directly or indirectly to physical person for the fulfillment of employment activities in the benefit of employer.

Fringe benefits include private use of motor vehicle, meals and accommodation, payment of house rental, electricity, water, telephone, domestic servants etc.

These fringe benefits are subject to a flat rate of 20% of the market value of fringe benefits provided to an employee inclusive of all taxes.



Scope of withholding tax (“WHT”)

Any resident taxpayer, called withholding tax agent, carrying on business and who makes any payment in cash or in kind has an obligation to withhold the tax and remit to tax administration. WHT is due at different rates when payment is made.

The payment is considered as made:

- At the time of cash is paid or
- At the time of recording in the book of account as expense.

Withholding tax base is an actual amount per contract or invoice (Not the gross up amount).

In the event that a taxpayer fails to withhold taxes from suppliers or employees, the taxpayer is not allowed to gross up the bases to calculate those taxes. Any withholding taxes borne by the taxpayer as a result of the above failure are not deductible for ToP purposes.

WHT rates for resident

Payment to a resident is subject to WHT as the following tax rates:

Kinds of payment	Rate
Performance of services including management, consultancy, and similar services	15%
Royalties for intangible properties and interests in minerals (Note 1)	15%
Interest paid to resident taxpayer, physical person, or an enterprise other than domestic banks and saving institutions	15%
Rental of a movable or immovable property (Note 2)	10%
Fixed-term interest paid by a domestic bank or saving institution to a resident taxpayer	6%
None fixed-term interest paid by a domestic bank or saving institution to a resident taxpayer	4%

Note 1: There is no withholding tax on royalty fees applied for payment to the local firm producer for three (3) years up to 31 December 2018. In addition, there is no withholding tax applied for payment by local cinema to the local agent (local firm distribution agent) as the firm product does not belong to that local agent.

Note 2: There is no withholding tax on rental applied for payment to property management company (real estate company), who already paid the withholding tax on rental to tax administrative by deducting or paying on behalf to the real owner of the property except the property is belong to that property management company.

WHT rates for non-resident

Payment to a non-resident is subject to WHT as the following tax rates:

Kinds of payment	Rate
Interest	14%
Royalties, rent, and other incomes connected with the use of property	14%
Payment for management or technical services	14%
Dividends	14%

WHT exemption

Payment in cash or kinds as the following is exempt from WHT:

- a) Interest paid to a domestic bank or saving institution or financial institution
- b) Payment to an income exempted person as stated in Article 9 (New) of the CLoT
- c) Payment to Government or a government institution of the royalties or rental of movable or immovable properties
- d) Payment of an income subject to the ToS
- e) Payment made by the Government or a government institution to a non-resident on a loan
- f) Payment to the real regime tax payer (VAT registered person) for the performance of services, including management, consultancy, and similar services.

WHT on dividend distribution

Distributions of dividends are subject to additional dividend distribution tax ("ADDT"). The additional WHT rates are varied based on the profit tax rate has been remitted by the Company:

Dividend paid out of earning Subject to Tax on Profit at:	Additional WHT rate
0%	20% or 30%
9%	11/91
20%	Nil
30%	Nil



Scope of value added tax (“VAT”)

Taxpayer subject to self-assessment system who makes taxable supplies shall have the obligation to register for VAT.

VAT is imposed on the consumption of goods and services for all stages of supply.

Taxable supply

Taxable supply means:

- 1) The supply of goods or services by a taxable person in the Kingdom of Cambodia. Goods mean tangible properties other than land or money
- 2) The appropriation of goods for his own use by the taxable person
- 3) Gift or supply at below cost of goods or services by the taxable person
- 4) Importation of goods into the customs territory of the Kingdom of Cambodia.

Non-taxable supply

Non-taxable supplies are as follows:

- 1) Public postal service
- 2) Hospital, clinic, medical and dental services and the sale of medical and dental goods incidental to the performance of such services
- 3) Wholly state owned public transportation
- 4) Insurance services
- 5) Primary financial services
- 6) Importation of goods for personal use
- 7) Not for profit activities in the public interest
- 8) Electricity, clean water for use except for all kinds of pure drinking water
- 9) Education service fees
- 10) Garbage collect fees, or cleaning fees of solid or liquid garbage
- 11) Supply of raw agricultural products.

Taxpayer who provides non-taxable supply as above is unable to claim its input VAT. The input VAT is considered as the cost of those goods or services purchased.

Taxpayer who provides non-taxable supply together with taxable supply is able to claim a portion of input VAT based on the portion of taxable supply as below formula:

Input VAT allowed = $A * B / C$ (A = total of input VAT, B = Total value of taxable supplies, C = total value of both taxable supply and non-taxable supply).

- ✦ If B/C less than 0.05 so all input VAT is not allowed
- ✦ If B/C more than 0.95 so all input VAT is allowed
- ✦ If B/C is in between so the only portion of input VAT is allowed

VAT rates

Only two rates of VAT are imposed by CLoT:

- 1) 10% for all taxable supplies
- 2) 0% for exporting of goods or services,
- 3) 0% for providing international transportation and other services related,
- 4) 0% for providing the supporting industries who serve for 100% export includes garment textile, footwear and rice,
- 5) Under the state charge (responsible by the Government) for importing of agricultural materials for agricultural purpose,
- 6) 0% for supplying paddy locally.

Taxpayer who supplies 0% of taxable supplies above is able to claim its input VAT.

VAT registration

Taxpayer who meets the criteria below for self-assessment system and supplies taxable supplies requires to register VAT:

- 1) All types of corporation, import-export enterprises and investment enterprises
- 2) Certain taxable turnover in any period of three consecutive calendar months in exceeding of:
 - a) 125 million KHR for supplying of goods (Approximate: USD 31,250)
 - b) 60 million KHR for supplying of services (Approximate: USD 15,000)
 - c) 30 million KHR for contracting with the Government (Approximate: USD 7,500)
- 3) Voluntary

Condition for creditable input VAT

There are certain conditions that taxpayer could claim its input VAT as below:

- 1) Purchase or import within 60 days before VAT registration
- 2) Local purchase made during the month
- 3) Import of goods during the month

Non-creditable input VAT

- 1) Tax paid by a taxpayer on entertainment, amusement, or recreation except that taxpayer is in the same business industry
- 2) Tax paid on the purchase of or import of automobiles with less than 10 seats except that taxpayer is in the same business industry
- 3) Tax paid on the purchase of or import of certain petroleum products except that taxpayer is in the same business industry
- 4) Tax paid for mobile phone services



Specific Business Tax

Scope of Specific tax on certain merchandises and services

Specific tax ("ST") is a form of excise tax that applies to the importation or domestic production and provision of certain goods and services.

The tax is levied once only during importation or upon the sale from factory if the product is locally produced.

Tax rates

The tax rates for certain goods/services are as follows:

Goods/services	Calculation & rates	Effective date
Importation of beer	30% of import value	1 April 2016
Local production of beer	30% of selling price recorded on invoice excluding VAT and ST	1 April 2016
Local production of wine	35% of 90% of selling price recorded on invoice excluding VAT and ST	1 April 2016
Importation of wine	35% of import value	1 April 2016
Local production of other beverages	10% of selling price recorded on invoice excluded VAT and ST	1 April 2016

Goods/services	Calculation & rates	Effective date
Importation of other beverages	10% of import value	No change
Local production of all tobacco products	20% of 90% of selling price recorded on invoice excluded VAT and ST	1 April 2016
Importation of all tobacco products	20% of import value	1 April 2016
Local and international calls	3%	No change
Domestic sale of air tickets for local and international transportation	10%	No change
Entertainment services	10%	No change
Lubricant, brake oil, raw material for producing engine oil (imported)	20% raw material for producing engine oil. 25% for additional material for engine oil.	1 April 2016
More		

A¹Accommodation

Accommodation tax

Accommodation tax (“AT”) is an indirect tax imposed on the hotel accommodation services for all types of real regime.

Term of hotel includes hotel, apartment, suite, resort, motel, lodge, bungalow, guesthouse, tourist camping and others.

AT is taxed at 2% on the room cost inclusive of other services charge and all taxes except VAT and AT.



Public lighting tax

Public lighting tax (“PLT”) is imposed on all supply chain of all kinds of alcohol and cigarettes regardless of local production or imported.

Term of alcohol and cigarettes include:

- Beer, fresh grape wines, including wine enriched with alcohol, fresh grape wines prepared with the help of plants or flavored substances, other ferment beverages except palm tree wine and white wine, and alcoholic strength by volume of 80% or higher.
- All kinds of cigarettes and cigars.

PLT is taxed at 3% on the taxable value inclusive of all taxes except VAT and PLT.



Patent tax

Annual patent tax is imposed to all kinds of businesses.

Patent requires when:

- 1) Register new business
- 2) One patent serves for one business objective and one provincial or capital city. E.g. A business having the activities of import & export, transportation, and hotel requires to apply for three different patents,
- 3) Change business ownership except the changes of parents, spouse, children or legal business successor.
- 4) Change location from one geographical area to another,
- 5) Change activity of the business.

Patent tax is levied based on the types of real regime taxpayers and/or the estimated level of turnover of those real regime taxpayers.

a) Large taxpayer:

- Turnover from 2,000 million riels (Approximate: USD 500,000) to 10,000 million riels (Approximate: USD 2.5 million), patent tax is levied at 3 million riels (Approximate: USD 750)
- Turnover above 10,000 million riels (Approximate: USD 2.5 million) onward, patent tax is levied at 5 million riels (Approximate: USD 1,250)

- # Immovable property owned by diplomatic, foreign consulates or international organization and technical cooperation agency
- # Infrastructure such as road, bridge, pure water production system or electricity production system, airport, port, train station
- # House, building and other constructions built on the agricultural land
- # House, building and other constructions in progress which are below 80% completion and unused
- # Immovable properties located in the special economic zones.

Stamp tax

Domestic production or importation of cigarettes requires to affix stamp tax on the packets of each individual packet. The price of stamp tax is varied from time to time.

House and rent tax

Businesses other than those in real regime taxpayer renting out land, buildings, and others are liable for house and rent tax at the rate of 10% of the rental fee.

Unused land tax

Land is determined to be unused if it does not have any construction or if having construction but unused. Unused land is levied at 2% of the market value of the land per sq. m with a deduction of 1,200 sq.m of each land as determined by the Commission for Evaluation of Unused Land.

Registration tax (“RT”)

RT is payable by the person who receives the ownership at the following rates:

- 1) KHR 1,000,000 (Approximately USD 250) for the registration of certain legal documents
- 2) 4% for the transfer of ownership of all immovable property
- 3) 4% for the transfer of ownership of all means of transportation
- 4) 0.1% for the transfer of ownership or possession of the shares
- 5) 0.1% for the registration of all contracts with the Government.

Regulation and procedure of simplified accounting for small taxpayers

Tax on profit

Tax classification	Tax rule
General withholding tax	Small taxpayers are exempted from the role of tax agent except from the role of tax agent of the withholding tax on rental of movable and immovable property
Fixed assets	<ul style="list-style-type: none"> # Allowed for the fixed assets to be used for business purpose except land, building, shop and tourist vehicle # Fixed assets exit before registration, the value of 50% of original cost or market value is allowed # Fixed assets valued more than 1 million riels (Approximate: USD 250) is allowed otherwise treated as a business expense # Only owned fixed assets and finance lease fixed assets are allowed to record as fixed assets
Tax depreciation	<ul style="list-style-type: none"> # Declining method at 30% rated is allowed per year # If the undepreciated value of total pooled of assets account valued less than 1 million riels (Approximate: USD 250), that value is allowed to treat as an expense of that taxable year

Tax classification	Tax rule
Current expenditures	Only business expenses are allowed to be deducted
Inventory	<ul style="list-style-type: none"> ▮ List of inventories is required to maintain for merchandising business. ▮ No list of inventories is required to maintain if the turnover from selling product is less than 10% of the total turnover from selling product together with selling services
Profit tax	Progressive rate as per previously disclosed (Page 2)
Minimum tax	1% of annual turnover
Prepayment profit tax	1% of monthly turnover including of all taxes except VAT
Loss utilization	Loss is not allowed to carry forward

Value added tax (“VAT”)

The same principal of VAT rule and regulation is applied except an input VAT below:

- ▮ Input VAT is allowed at 80% of total output VAT even if there is no supporting documentation to prove that input VAT.

Other taxes

Small taxpayer is obliged to withhold and remit the tax on salary and other taxes in compliance with the CLoT.

Simplified accounting

There are three simple books are required for simplified accounting:

- # Sales day book
- # Purchases day book
- # Inventory book.

In case, the small taxpayer does not record properly or misstated of the simplified accounting requirement, the turnover and taxable profit will be reassessed by tax administration as below:

- # Reassess the estimated turnover by tax officer
- # 20% of estimated turnover will be considered as taxable profit for merchandising business
- # 40% of estimated turnover will be considered as taxable profit for servicing business
- # 50% of estimated turnover will be considered as taxable profit for supplying of jewelry (gold, diamond and other precious stone) and currency exchange house.



Tax audit

Tax audit is taking as the following period:

- 1) Within 3 years after the date of the tax return was submitted
- 2) Within 10 years after the date of the tax return was required to be submitted if there is evidence of the obstruction of the implementation of tax provisions;
- 3) At any time with the written consent of the taxpayer

Tax penalties

The tax penalties are imposed by the tax administration ranging from 10% to 40% with the monthly interest of 2%.

Another obstruction to the work of the tax administration will be penalized of 2 million riels (App. USD 500) per case.

Moreover, any taxpayer who submits incorrect reports of the tax liabilities shall be guilty of a violation of the law and liable for a fine from five million riels (App. USD 1,250) or imprisonment from one month to one year or both.

Change in tax year

Legal company who has 51% or more of share owned by foreign enterprise could request for a different tax year from the normal company's tax year, normally 31 December.

The request shall be enclosed with the following requirement:

- 1) Certification letter from foreign parent company for those different tax years
- 2) Certification letter from an audit firm of the foreign parent company for those different tax years
- 3) True copy of the memorandum of article of incorporation of that foreign parent company.

Qualified investment project (“QIP”)

Tax incentive

QIP, approved by Cambodian Development Council (“CDC”), will receive the benefits as below:

- 1) Exempted from ToP and PPT during the exempted period which is determined as below:
 - ❖ Trigger period (Maximum: first year of profit or three years after the QIP derives its first income; plus
 - ❖ Tax holidays for three years; plus
 - ❖ Priority period which is depending on the type of investment
- 2) Exempted from minimum tax
- 3) Special depreciation rate of 40% in the first year of the used of its property in their production or processing. This is eligible only the ToP exemption is not taken.
- 4) Import duty exemption on the import of construction materials and equipment.

QIP obligation to CDC

In order to retain its investment incentive, all QIPs are required to submit the following documents to the CDC by no later than ninety working days of the following financial year. The CDC may revoke the QIPs license if it's not satisfied with the information required to be lodged:

- 1) An annual financial statement
- 2) A certification of tax compliance
- 3) Quarterly report on the actual importation of movable property, production input
- 4) Quarterly report on the actual exportation of the finished goods
- 5) Investment information sheet

Tax administrative

Date of filing tax

There are no official administrative fees charged by Tax Department as per Prakas. 1146 dated 15 September 2015.

Type of tax	Deadline	Approved from Tax
Tax on profit	Within 3 months after the end of the Company's tax year. E.g. 31 March if the Company's tax year is 31 December.	1 day after payment and documents submission
Prepayment profit tax	Monthly tax due by the 20 th of the following month.	1 day after payment and documents submission
Minimum tax	Within 3 months after the end of the Company's tax year. E.g. 31 March if the Company's tax year is 31 December.	1 day after payment and documents submission
Tax on salary	Monthly tax due by the 20 th of the following month.	1 day after payment and documents submission
Withholding tax	Monthly tax due by the 20 th of the following month.	1 day after payment and documents submission

Type of tax	Deadline	Approved from Tax
Value added tax	Monthly tax and the payment due by 20 th of the following month	1 day after payment and documents submission
Specific tax	For importation: Tax is due when importation. For local production: Tax is due by the 20 th of the following month.	1 day after payment and documents submission
Patent tax	Yearly tax due by 31 st of March of the following year	3-7 days after payment and documentation submission
Accommodation tax	Monthly tax due by the 20 th of the following month	1 day after payment and documents submission
Public lighting tax	Monthly tax due by the 20 th of the following month	1 day after payment and documents submission
Immovable property tax	Yearly tax due by the 30 September each year	Immediately
Unused land tax	Yearly tax due by the 30 September each year	1 to 2 days

Official administrative fee

The official administrative fees were charged by the Tax Department as per Prakas. 1146 dated 15 September 2015 for the following services:

Description/services	Service fee (USD)	Period
Self-assessment system tax registration - Certificate of tax registration - Tax registration identification card - Patent certification	100	7-10 days (At Tax administration)
Self-assessment system information updating - Certification of tax registration - Tax registration identification card - Patent certification	50	1-7 days (Through electronic systems)
Stamp tax: - Affixing on cigarette packet (per sheet) - Affixing on carton of wine, beer or non-alcoholic drinks (per sheet)	0.0125 0.025	Immediate
Tax on immovable properties rental	NIL	Immediate
Unused land tax	NIL	1-2 days
Tax on means of transportations	NIL	Immediate
Stamp tax (advertisement/company's name plate)	NIL	Immediate
Slaughter tax	NIL	Immediate

Description/services	Service fee (USD)	Period
Registration tax on transferring of ownership of immovable property or transferring of occupancy right of immovable property for: <ul style="list-style-type: none"> - Immovable property which is not in the form of receiving gifts or succession - Immovable property which value is from one hundred million riels (App. USD 25,000) or tax from four million riels (App. USD 1,000) 	100	4-8 days
Registration tax on transferring of ownership of immovable property or transferring of occupancy right of immovable property for: <ul style="list-style-type: none"> - Immovable property which is in the form of receiving gift, succession - Immovable property which value is below one hundred million riels (App. USD 25,000) or tax below four million riels (USD 1,000) 	NIL	4-8 days
Registration tax on transferring of ownership of vehicle and transportation means	NIL	2-5 days
Registration tax for transferring shares of company	NIL	4-8 days
Contract cost for goods or	NIL	1-3 days

Description/services	Service fee (USD)	Period
services supply using state budget		
Registration tax on legal documents <ul style="list-style-type: none"> - Documentation on establishing company - Documentation on merging the companies - Documentation on resolving the company 	NIL	1-3 days (After auditing's result)
Tax obligation certification	NIL	4-8 days (After auditing's result)
Consulting on the procedure of law on taxation	NIL	Immediate
Receipt of tax payment on <ul style="list-style-type: none"> - Tax on means of transportation - Property tax 	1.25 1.25	During tax declaration
Tax agent course fees at the National School of Taxation	250	Submission of the application form
Exam registration fees at the National School of Taxation (Trainee undergoes the training at the National School of Taxation) <ul style="list-style-type: none"> - First and Second attempt - Third attempt and afterwards 	20 25	Submission of the application form
Exam registration fee at the		Submission of

Description/services	Service fee (USD)	Period
National School of Taxation (Participant does not undergo the training at the National School of Taxation)	125	the application form

Tax banks accounts

Location	Aceda Bank	Account Name
1. Phnom Penh	0001-01635978-1-8	General Department of Taxation/Large Taxpayers Management Department (All kinds of Taxes)
	0001-01622601-1-1	General Department of Taxation/Large Taxpayers Management Department (Penalties)
	0001-01648493-1-3	General Department of Taxation/Law Legislative and Statistics Department (Ownership Transfer & Unused Land)
	0001-01635640-1-6	General Department of Taxation/Law Legislative and Statistics Department (Penalties)
2. Khan Sensok	3484-01620022-2-2	General Department of Taxation/Sensok Tax Branch (All kinds of Taxes)
	3484-01619333-3-3	General Department of Taxation/Sensok Tax Branch (Properties Tax)

Location	Aceda Bank	Account Name
	3484-01619898-1-8	General Department of Taxation/Sensok Tax Branch (Penalties)
3. Khan Russey Keo	2300-01673813-1-6	General Department of Taxation/Russey Keo Tax Branch (All Kinds of Taxes)
	2300-01673825-1-6	General Department of Taxation/Russey Keo Tax Branch (Properties Taxes)
	2300-01673547-1-6	General Department of Taxation/Russey Keo Tax Branch (Penalties)
4. Khan Meanchey	2800-01715567-6-7	General Department of Taxation/Meanchey Tax Branch (All Kinds of Taxes)
	2800-01715566-6-6	General Department of Taxation/Meanchey Tax Branch (Properties Taxes)
	2800-01715568-6-8	General Department of Taxation/Meanchey Tax Branch (Penalties)
5. Khan Posenchey	2200-01652989-1-9	General Department of Taxation/Posenchey Tax Branch (All Kinds of Taxes)
	2200-01652427-1-7	General Department of Taxation/Posenchey Tax Branch (Properties Taxes)
	2200-01651989-1-9	General Department of Taxation/Posenchey Tax Branch (Penalties)
6. Khan	3600-	General Department of

Location	Aclea Bank	Account Name
Tuol Kork	01699547-1-5	Taxation/Tuol Kork Tax Branch (All Kinds of Taxes)
	3600- 01699555-1-5	General Department of Taxation/Tuol Kork Tax Branch (Properties Taxes)
	3600- 01699969-1-9	General Department of Taxation/Tuol Kork Tax Branch (Penalties)
7. Khan Daun Penh	1800- 01679981-2-1	General Department of Taxation/Daun Penh Tax Branch (All Kinds of Taxes)
	1800- 01679981-1-1	General Department of Taxation/Daun Penh Tax Branch (Properties Taxes)
	1800- 01679981-3-1	General Department of Taxation/Daun Penh Tax Branch (Penalties)
8. Khan Dangkor	3437- 01611557-1-7	General Department of Taxation/Dangkor Tax Branch (All Kinds of Taxes)
	3437- 01611967-1-7	General Department of Taxation/Dangkor Tax Branch (Properties Taxes)
	3437- 01610785-1-5	General Department of Taxation/Dangkor Tax Branch (Penalties)
9. Khan Chamkar Mon	2900- 01677788-1-8	General Department of Taxation/Chamkar Mon Tax Branch (All Kinds of Taxes)
	2900-	General Department of

Location	Aclea Bank	Account Name
	01677777-1-7	Taxation/Chamkar Mon Tax Branch (Properties Taxes)
	2900-01655555-1-5	General Department of Taxation/Chamkar Mon Tax Branch (Penalties)
10. Khan 7 Makara	0900-01675555-1-5	General Department of Taxation/7 Makara Tax Branch (All Kinds of Taxes)
	0900-01676666-1-6	General Department of Taxation/7 Makara Tax Branch (Properties Taxes)
	0900-01673333-1-3	General Department of Taxation/7 Makara Mon Tax Branch (Penalties)

Location	Canadia Bank	Account Name
1. Phnom Penh	001000 2197297	General Department of Taxation/Large Taxpayers Management Department (All kinds of Taxes)
	001000 2197311	General Department of Taxation/Large Taxpayers Management Department (Penalties)
2. Phnom Penh	001000 2196781	General Department of Taxation/Law Legislative and Statistics Department (Ownership Transfer & Unused Land)
	001000 2196722	General Department of Taxation/Law Legislative and

Location	Canadia Bank	Account Name
		Statistics Department (Penalties)
3. Khan Chamkar Mon	001000 2196676	General Department of Taxation/Chamkar Mon Tax Branch (All Kinds of Taxes)
	001000 2196692	General Department of Taxation/Chamkar Mon Tax Branch (Properties Taxes)
	001000 2196684	General Department of Taxation/Chamkar Mon Tax Branch (Penalties)
4. Khan Daun Penh	001000 2196889	General Department of Taxation/Daun Penh Tax Branch (All Kinds of Taxes)
	001000 2196862	General Department of Taxation/Daun Penh Tax Branch (Properties Taxes)
	001000 2196854	General Department of Taxation/Daun Penh Tax Branch (Penalties)
5. Khan Toul Kork	001000 2196994	General Department of Taxation/Tuol Kork Tax Branch (All Kinds of Taxes)
	001000 2197017	General Department of Taxation/Tuol Kork Tax Branch (Properties Taxes)
	001000 2197028	General Department of Taxation/Tuol Kork Tax Branch (Penalties)
6. Khan 7	001000	General Department of

Location	Canadia Bank	Account Name
Makara	2197079	Taxation/7 Makara Tax Branch (All Kinds of Taxes)
	001000 2197087	General Department of Taxation/7 Makara Tax Branch (Properties Taxes)
	001000 2197052	General Department of Taxation/7 Makara Mon Tax Branch (Penalties)
7. Khan Posenchey	001000 2196072	General Department of Taxation/Posenchey Tax Branch (All Kinds of Taxes)
	001000 2196153	General Department of Taxation/Posenchey Tax Branch (Properties Taxes)
	001000 2196064	General Department of Taxation/Posenchey Tax Branch (Penalties)
8. Khan Meanchey	001000 2199624	General Department of Taxation/Meanchey Tax Branch (All Kinds of Taxes)
	001000 2199578	General Department of Taxation/Meanchey Tax Branch (Properties Taxes)
	001000 2199608	General Department of Taxation/Meanchey Tax Branch (Penalties)
9. Khan Russey Keo	001000 2196196	General Department of Taxation/Russey Keo Tax Branch (All Kinds of Taxes)
	001000	General Department of

Location	Canadia Bank	Account Name
	2196207	Taxation/Russey Keo Tax Branch (Properties Taxes)
	001000 2196218	General Department of Taxation/Russey Keo Tax Branch (Penalties)
10. Khan Sen Sok	001000 2366318	General Department of Taxation/Sensok Tax Branch (All kinds of Taxes)
	001000 2366326	General Department of Taxation/Sensok Tax Branch (Properties Tax)
	001000 2366334	General Department of Taxation/Sensok Tax Branch (Penalties)
11. Khan Dangkor	001000 2366897	General Department of Taxation/Dangkor Tax Branch (All Kinds of Taxes)
	001000 2366873	General Department of Taxation/Dangkor Tax Branch (Properties Taxes)
	001000 2366881	General Department of Taxation/Dangkor Tax Branch (Penalties)

Location	ABA Bank	Account Name
1. Phnom Penh	050017700 01018	General Department of Taxation/Large Taxpayers Management Department (All kinds of Taxes)
	050017700 01029	General Department of Taxation/Large Taxpayers Management Department (Penalties)
2. Khan Chamkar Mon	050017700 08019	General Department of Taxation/Chamkar Mon Tax Branch (All Kinds of Taxes)
	050017700 08042	General Department of Taxation/Chamkar Mon Tax Branch (Properties Taxes)
	050017700 08020	General Department of Taxation/Chamkar Mon Tax Branch (Penalties)
3. Khan Daun Penh	050017700 05010	General Department of Taxation/Daun Penh Tax Branch (All Kinds of Taxes)
	050017700 05043	General Department of Taxation/Daun Penh Tax Branch (Properties Taxes)
	050017700 05021	General Department of Taxation/Daun Penh Tax Branch (Penalties)
4. Khan Toul Kork	050017700 09012	General Department of Taxation/Tuol Kork Tax Branch (All Kinds of Taxes)
	050017700	General Department of

Location	ABA Bank	Account Name
	09045	Taxation/Tuol Kork Tax Branch (Properties Taxes)
	050017700 09023	General Department of Taxation/Tuol Kork Tax Branch (Penalties)
5. Khan 7 Makara	050017700 06013	General Department of Taxation/7 Makara Tax Branch (All Kinds of Taxes)
	050017700 06046	General Department of Taxation/7 Makara Tax Branch (Properties Taxes)
	050017700 06024	General Department of Taxation/7 Makara Mon Tax Branch (Penalties)
6. Khan Posenchey	050017700 10016	General Department of Taxation/Posenchey Tax Branch (All Kinds of Taxes)
	050017700 10049	General Department of Taxation/Posenchey Tax Branch (Properties Taxes)
	050017700 10027	General Department of Taxation/Posenchey Tax Branch (Penalties)
7. Khan Meanchey	050017700 07016	General Department of Taxation/Meanchey Tax Branch (All Kinds of Taxes)
	050017700 07049	General Department of Taxation/Meanchey Tax Branch (Properties Taxes)
	050017700 07027	General Department of Taxation/Meanchey Tax Branch

Location	ABA Bank	Account Name
		(Penalties)
8. Khan Russey Keo	050017700 03014	General Department of Taxation/Russey Keo Tax Branch (All Kinds of Taxes)
	050017700 03034	General Department of Taxation/Russey Keo Tax Branch (Properties Taxes)
	050017700 03025	General Department of Taxation/Russey Keo Tax Branch (Penalties)
9. Khan Sen Sok	050017700 04017	General Department of Taxation/Sensok Tax Branch (All kinds of Taxes)
	050017700 04040	General Department of Taxation/Sensok Tax Branch (Properties Tax)
	050017700 04028	General Department of Taxation/Sensok Tax Branch (Penalties)
10. Khan Dangkor	050017700 11019	General Department of Taxation/Dangkor Tax Branch (All Kinds of Taxes)
	050017700 11042	General Department of Taxation/Dangkor Tax Branch (Properties Taxes)
	050017700 11020	General Department of Taxation/Dangkor Tax Branch (Penalties)

Business registration



In Cambodia, investor might invest in the following types of business:

- 1) Limited liability company
- 2) Branch office
- 3) Representation office

To register a business in Cambodia with the Ministry of Commerce, the following documentation is required:

- a) Shareholders – Individual person

Item	Documentation
1	Propose a Company name at least two or three
2	Copies with original signature of passport of each shareholder
3	Photo (4*6) or passport size
4	Address of the new Company along with rental contract
5	Propose Capital registration

Shareholders – Companies

Item	Documentation
1	Propose a Company name at least two or three
2	Copies with original signature of passport of the representative
3	Photo (4*6) or passport size
4	Address of the new Company along with rental contract
5	Propose Capital registration
6	Parent's certification of incorporation with Public notarization
7	Board resolution to establish a Company in Cambodia and appoint the representative (Sign and seal by the Parent Company)
8	Parent's Memorandum of Association with Parent's Company's seal on it or certified true copy

To register with the General Department of Taxation, the following documentation is required:

Item	Documentation
1	Documentation from Ministry of Commerce
2	Residency address of the representative or shareholders certified by local authority
3	If Cambodian resident, Residency book or family book
4	Original Rental contract
5	Property Tax of the rental building or own building
6	Original passport or ID card

Item	Documentation
7	Bank confirmation

Official administrative fees

The official administrative fees were charged by the Ministry of Commerce as per Prakas. 985 dated 28 December 2012 for the following services:

Description/services	Service fee (USD)	Period
Commercial registration	400	3-5 days
Legal consultation services on commercial registration	100	1 day
The services of new or amended the Company statute	100	2days
Search on mark or name of Company	10	50-60 days
Deregistration of the business	100	3-5 days
Change in shares	100	3-5 days
Other amended Director, business objective, name or quorum	40	3-5 days
Change of Company's office	Free	
Change of commercial registration certificate	40	3-5 days
Establishment of branch of local company	100	3-5 days
Filling of annual declaration	20	1 day

Description/services	Service fee (USD)	Period
Mark registration	65	No longer than 6 months
Application of mark registration	7.5	
Mark deregistration	75	Case by case
Application and mark renewal registration	75	50-60 days
Recognition of exclusive right	70	50-60 days

Registration with Ministry of Labor

As per Article 17 of the Cambodian Labor Law states that “the Company has to register its business with the Ministry of Labor within 30 days of the Company’s establishment”.

The Company has to obtain the following documentation:

- # To declare of the Company’s opening with the Ministry
- # To declare the movement of the employees
- # To obtain the Company’s internal regulation
- # To obtain employee’s workbook
- # And Others

Failure to do that the Company is at risk of being imposed by the authority of penalties from 61 days to 90 days of the daily payroll expense and/or being in prison from 1 to 30 days.

Foreign labor obligation (Quota)

The requirement of foreign worker for an enterprise shall be planned ahead if the owners, directors of enterprise could not recruit any Cambodian to fulfill their desirable needs. Enterprise is required to make a request for the need of foreign worker from the Ministry of Labor by the end of November each year based on the Prakas 196 of the Ministry.

As mention in the Prakas as well, the Ministry allows to recruit the foreign workers up to 10% of the total number of Cambodian workers. In case the need is over 10%, the request letter shall mention clearly about the position, or professional skill of those foreign workers.

Foreign work permit

As per Prakas 195 of the Ministry, the owners, directors of enterprise who employ foreign workers shall properly fill the application for work permit and employment card. The work permit is required to submit by the end of March each year. The yearly charge of each foreigner is USD 100.

National social security fund (“NSSF”)

As per Prakas 021/08 KB/Brk of NSSF law states that “employers, or the owner of all enterprises under the provisions of the law are under an obligation to register NSSF with the Ministry of Labor”.

Regardless of nationality, race, sex, belief, religion, political opinion, national extraction, social origin, and membership of trade union or act in trade unions, all types of employee defined by the provisions of the labor law if those people perform work in the territory of the Kingdom of Cambodia, shall be covered by the Social Security Schemes.

Accounting standards

As per notification from the National Accounting Council (“NAC”), the NAC decided to adopt a hundred percent of the International Financial Reporting Standards (“IFRS”) for the entities registering in the Kingdom of Cambodia. This adopted standards called the Cambodian International Financial Reporting Standards (“CIFRS”).

For small and medium entities, the notification is also stated that the entities are required to comply with the Cambodian International Financial Reporting Standards for Small and Medium-sized entities (“CIFRS for SMEs”). Only for the enterprise who is responsible for the public interest is required to adopt the CIFRS.

Annual statutory audit

- i. Meet two out of the three criteria as follows, the Company is required to be audited by an Independent Auditor registering in the list of Kampuchea Institute of Certified Public Accountants and Auditors (“KICPAA”):
 - a) Annual income starting from 3,000 million riels (Approximately USD 750,000)
 - b) An average of the Company’s assets starting from 2,000 million riels (Approximately USD 500,000)
 - c) An average of the Company’s employee exceeds 100 people
- ii. All QIPs registered with CDC are required to be audited by an independent auditor registering in the list of KICPAA
- iii. Audit is required to finish within six (6) months after the financial year ending.

Top 10 common issues with tax auditor

- 1) Total annual turnover is less than cost of production as per financial statements: this normally happens with garment factory. Two possible ways that might be reassessed by tax auditor:
 - Reassessed sales figure and company might be reassessed on VAT, PPT, and ToP. If company is a 100% export to a related party, the sale figure might be reassessed. This result to PPT and ToP will be determined.
 - If it's serious, unilateral tax reassessment might be imposed. This result to the expense of company is void and re-determined the expenses again by the Tax auditor.
- 2) Payroll of foreign worker and company's director or representative (foreigner): This happens where company is employing the foreigner and tax auditor will reassess again their payroll to the current market rate. The following condition applied:
 - Foreigner's worker's or director's payroll is not reasonable without any proper contract or proof to support the transaction.
 - Representative of company with no payroll are given.
- 3) Withholding tax on rental: This happens where the rental fee is very low and some companies share office space with each other and only one among those companies paid the tax.
- 4) Freight forwarder company that purchases freight from supplier and sell to other clients with margin. As per VAT sub-degree, oversea freight is subject to 0% VAT however, per VAT Prakas, the margin of freight made

by agent is subject to 10% VAT. In normal practice, those freight forwarders rarely charge VAT 10% on that margin.

- 5) Timing of issuing invoice: This happens with the construction company or company that sells a high value of a product or service. As per contract, the deposit is normally required from customers and that deposit is not accommodating with proper invoice and VAT charge (if local sale) from the company as a seller. As per sub-degree of VAT, invoice shall be issued within 7 days of receiving money or within 7 days of delivering goods or services or at the time of issuing invoices where any case happens first.
- 6) Loan registration with tax administrative: Some companies receive money from the parent company or shareholder (aside from capital registration) without proper agreement or the agreement is not registered with tax administrative. There is a possible reason where the tax auditor considers those inflows as the company's turnover and relevant tax might be reassessed (VAT, PPT, ToP, or WHT etc...)
- 7) Related parties' transaction: This happens where company purchases and sells from/to related party. Tax will consider as transfer pricing transaction if the transaction is not at arm-length transaction.
- 8) The disposal of assets without proper informing to the tax administrative. This case happens where the assets are taken out from company's assets listing and there is no transaction of disposal made by the company declared on the monthly tax return or there is no information made to tax administrative where the assets are written off. Without proper information, the

written off assets might be reassessed as disposal. The price of disposing assets might be reassessed and resulted to VAT on the disposal, PPT as well as other relevant taxes might be reassessed.

- 9) Insufficient supporting documents on input VAT claimed by the company: some companies do not maintain supporting documents properly, such as a VAT invoice from suppliers and custom declaration documents. Tax auditor will not allow to credit input VAT if there is no proper supporting document to support the transaction as per CLoT, the company is required to keep supporting documents up to 10 years after occurring the accounting transaction.
- 10) Purchase invoices were not complied with the form provided by tax administrative. This case happens where the company accepts market invoices or receipt with no information of the suppliers as per stated in the notification from tax administrative. Those expenses might be not allowed as deductible expenses by the tax auditor.

Executive summary

PAT Professional is a Cambodian owned Certified Public Accountants Firm with office at Parkways square in Phnom Penh City. PAT Professional is establishing a national brand that will serve every client invested in Cambodia.

PAT Professional provides clients with forward thinking advice that helps them to break through complex business and financial issues by understanding their needs and bringing together the right team to address them. We, Together, is our slogan. With PAT Professional, your complexity is our challenges and your success is our success.

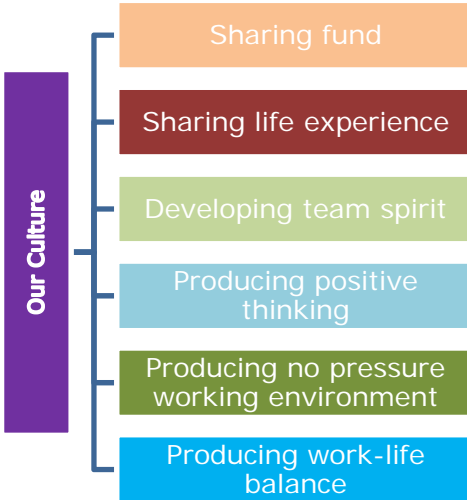
Core values

Strong values have been at the heart of PAT Professional since its establishment. They guide us in our daily actions, providing a common base of values that all PAT Professional's teams and partners share and respect. These values are detailed in PAT Professional's Charter, individually signed by each employee.



Our culture

At PAT Professional, we work hard and we play hard too! We, Together is the only one culture we are committing to adhere. To achieve this, various events and activities are organized in the purposes of:



Key to success

- # Guaranteeing Director engages for all assignments regardless of size
- # Assigning people with proven expertise, practical industry experience and our dialogue approach
- # Adhering the core values at all time
- # Delivering a report timely

Our services

PAT Professional provides a wide range of services such as Audit and Assurance, Taxation, Accounting, Consultation, Training and Recruitment. The key point of each service is as followings:

Audit & Assurance: Audit is at the core of our professional life. We truly add value to our clients' business through our dedicated personnel. Through our experienced partners and advisers, the clients trust us as a practical and simplistic entity.

Taxation: We are more than tax advisers. We are practical tax specialists. When we talk, we present our advice in terms you can relate to so that you will be able to understand our language. Quite simply, you will benefit from targeted, practical tax solutions.

Accounting: Business owners are working on the ways to improve quality services and products with low cost and without impacting on the effectiveness of key support functions and processes. We act as a back office support to ensure that your supporting function is working smoothly.

Consultation and corporation: We fulfill your entity's obligation to the State without interfering your time and also costs less.

Training: All that's left to do is contact PAT Professional and take the first step in commencing a rewarding qualification, enhancing career, and saving.

Recruitment: PAT Professional works closely with you to develop an accurate and compelling brief for each accountant you seek to fill. There will be no surprise when you interview your candidates. Each candidate will have already passed a rigorous vetting process.

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We, Together



PAT Professional Limited

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- Audit & Assurance
- Taxation
- Accounting
- Consultation
- Training & recruitment

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