National Accounting Council of Cambodia

Report

on

Implementation of Accounting Standards and Statutory Audits

in the

Kingdom of Cambodia

July 2016

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1. Summary

In January 2016, the National Assembly of the Kingdom of Cambodia passed the *Law on Accounting and Auditing*. Article 7 of this law gives authority to the National Accounting Council to monitor and enforce accounting and auditing rules.

In order to support the planning and management of the National Accounting Council, a study was conducted to estimate the degree of compliance with accounting standards and statutory external audits required by Cambodian law.

This study consisted of in-person interviews with 50 organisations followed by an online survey sent to 3,560 organisations, of which 363 responded.

It was found that 43% of companies required to follow accounting standards did so. Also, it was found that 59% of companies required to have an external audit did so. The rate of compliance with the external audit drops to 47% when financial institutions and audit firms are excluded. As companies are hesitant to self-report non-compliance, these rates of compliance determined by survey should be regarded as an upper estimate of the actual rate.

There were several reasons given by companies for non-compliance. The main reason was that compliance was not required by shareholders or management. Other reasons included lack of regulator enforcement, lack of human resources, and cost.

There are four recommendations to the National Accounting Council. First, it is recommended that the National Accounting Council set a rate of compliance that they would like to achieve. Progress towards that goal can be measured with an annual survey. Second, due to the high level of non-compliance, the National Accounting Council should limit the scope of its activities in order to have sufficient resources to enforce compliance with existing regulations. Third, the National Accounting Council should continue its campaign to create public awareness of accounting and audit requirements. Fourth, the National Accounting Council should review the criteria for selecting companies subject to the statutory audit to ensure that the benefits outweigh the costs.
2. Introduction

2.1 Purpose and Background

Purpose
The purpose of this study was to estimate the degree to which companies comply with the legal requirement to use accounting standards and the legal requirement to have an external audit, and any reasons for noncompliance.

The results of this survey are directed to the National Accounting Council (NAC) in order to support the NAC in developing a strategy to enforce the use of accounting standards and external audits.

To date, there has been no study to determine the extent of compliance with accounting standards and the statutory external audit. This limits the National Accounting Council in its ability to development an implementation and enforcement strategy.

Background
Cambodia has a legal requirement that certain companies apply accounting standards and have external audits. These requirements are under the 2002 Law on Corporate Accounts, Their Audit and Accounting Professions. Articles 3 - 5 of this law specifically require enterprises to prepare financial reports in accordance with standards, and to have those financial reports audited.

The requirements for an external audit are detailed in subsequent regulation under the 2002 law. A sub-decree issued under the authority of the 2002 law, the 2003 Sub-Decree on the Composition and Functioning of the Kampuchea Certified Public Accountants and Auditors sets out in Article 16 that the criteria for a compulsory external audit will depend on a level of turnover, balance sheet total, or number of employees. The specific requirements are detailed in a ministerial directive (in Khmer language “prakas”), the 2007 Prakas on Obligation of Submission of Financial Statements, which requires any company meeting 2 out of 3 of the following criteria to have an external audit:

1. Annual turnover of 3,000,000,000 riels (approximately USD 750,000)
2. Assets of 2,000,000,000 riels (approximately USD 500,000)
3. An annual average of 100 or more employees

Additionally, all enterprises that are a qualified investment project (QIP) registered with the Council for the Development of Cambodia (CDC) are required to have an external audit regardless of the three criteria listed above.

Similarly, the requirements for application of accounting standards are detailed in subsequent regulation under the 2002 law. The 2002 law itself requires financial accounting “in line with International Accounting Standards” as stated in Article 5. Article 5 states that the standards will be defined by ministerial directive (prakas) of the Ministry of Economy and Finance.

In 2009, ministerial directive No. 68 MEF/BK was issued, requiring that entities subject to the external statutory audit use IFRS, including IFRS interpretations and amendments. Article 2 of this directive stated that implementation of IFRS would occur following an
announcement issued by the National Accounting Council. Finally, in August 2009, the National Accounting Council issued an announcement requiring companies subject to an external audit to apply either IFRS or IFRS for SMEs. The effective date for application of IFRS was set as 1 January 2012. The NAC later postponed implementation for financial institutions, allowing them to follow an older set of standards referred to as Cambodian Accounting Standards (CAS). The announcement also renamed IFRS as CIFRS (Cambodian International Financial Reporting Standards) and IFRS for SMEs as CIFRS for SMEs.

2.2 Methodology

In Cambodia, organisations of a certain size and nature are legally required to comply with CIFRS and to have an audit. This research study intended to assess the degree of compliance with CIFRS and the statutory audit and the reasons for any noncompliance, leading to practical recommendations for policy makers at the Ministry of Economy and Finance and the National Accounting Council.

This research had two main phases. First, the researcher held in-person interviews with the CFOs, Finance Managers, and Accountants of 50 for profit and not-for-profit organisations, ranging from large commercial banks to an auto parts distributor. These interviews ranged from 30 minutes to 1 hour each and took place on the premises of the responding organisations.

Second, an online survey (see appendix) was sent to 3,560 company and organisation finance managers, managers and accountants. A detailed review of the 2015 Cambodian Yellow Pages and Super Pages business directories identified 4,984 businesses and organisations. Of the 4,984 entities listed in the directories, 611 could not be contacted and/or were determined to be inactive. Another 813 entities refused to provide an email for contact purposes. This resulted in the survey being sent to the remaining 3,560 entities. Ultimately, there were 363 responding organisations, including 292 business entities and 71 not-for-profit organisations (NGOs).

2.3 Limitations

There are two main limitations to this research. First, there is no way to determine the truthfulness of responses. If respondents are knowingly non-compliant with a law or regulations, they will be hesitant to respond or disclose that they are non-compliant and therefore breaking the law. Second, this study is limited by its sample. This study focuses on formal organisations that are listed in the main business directories. However, this will not reflect the population of organisations as many organisations are either informal or not listed in a business directory. Furthermore, it was not possible to determine population size as the number of active organisations in Cambodia is not available from public source. This research identified 14,000 companies registered with the Ministry of Commerce since 2005; however the business directories listed only a total of 4,984 organisations.

These two limitations were dealt with in two main ways. First, anonymity was offered and emphasized to all participants invited to join in interviews or the online survey. Secondly, the researcher attempted to achieve a large sample size so that the results would give a meaningful description of the population, regardless of the size of the population.
3. Implementation of Accounting Standards

3.1 Rate of Compliance with CIFRS or CIFRS for SMEs

This survey found that 43% of all businesses legally required to use CIFRS, CAS or CIFRS for SMEs did so. This rate of compliance should be regarded as a high estimate of overall compliance, based on the limitations of the study. Overall, a majority of all companies did not implement CIFRS, CAS or CIFRS for SMEs. Cambodian owned companies, regardless of size, had the lowest levels of compliance. Compliant companies were generally larger in size and had foreign shareholders.

There were 291 organisations responding to the question on accounting standards, including 235 business entities. This included both businesses required to comply with CIFRS, CAS or CIFRS for SMEs as well as smaller entities that are not required to follow any specific standard. The accounting standards used by the 235 business entities is shown in the figure below.

![Bar graph showing accounting standards used by organisations](image)

What accounting standard does your organisation use for its financial statements?

<table>
<thead>
<tr>
<th>Standard</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Basis</td>
<td>12%</td>
</tr>
<tr>
<td>No Standard</td>
<td>6%</td>
</tr>
<tr>
<td>CIFRS</td>
<td>15%</td>
</tr>
<tr>
<td>CIFRS for SMEs</td>
<td>9%</td>
</tr>
<tr>
<td>GAAP</td>
<td>6%</td>
</tr>
<tr>
<td>Other</td>
<td>5%</td>
</tr>
<tr>
<td>CAS</td>
<td>5%</td>
</tr>
<tr>
<td>CIFRS or SMEs</td>
<td>12%</td>
</tr>
</tbody>
</table>

N = 235

The legal requirement to have a statutory audit results in a larger proportion of companies using CIFRS or CIFRS for SMEs. As shown in the table below, 43% of businesses required by law to have a statutory audit used an accounting standard designated in Cambodian regulation (CIFRS, CAS, or CIFRS for SMEs) whereas only 24% of businesses not subject to an external audit used one of the three standards. Businesses which had an external audit were even more likely to comply, at 60% of the total.
During interviews, organisations not following a standard were asked which standard they were preparing to follow; most reported they were preparing to follow CIFRS.

Organisations that had already successfully implemented CIFRS or CIFRS for SMEs tended to have foreign shareholders or to be a subsidiary of an international company. Subsidiaries of international companies reported being able to access experts from their head office or regional office to help with setting up the accounting system and CIFRS implementation. Similarly, banks and MFIs that are majority foreign owned were more ready and willing to implement IFRS, whereas local banks expressed reservations.

The only sector that did not report following CIFRS was the not-for-profit sector, that is NGOs, which reported following GAAP, which they were most often did not identify as US GAAP or any specific country GAAP.

### 3.2 Accounting Difficulties in Applying Standards

Survey respondents were asked to identify the areas of CIFRS accounting that they faced difficulty with. Difficulty in determining the correct accounting application can be a barrier to compliance with standards.

The most common difficulties reported are shown in the tables below. As a percent of total respondents, excluding non-responses to this question. Accounting difficulties with responses of less than 5% of the total have been excluded.
Which of the following do you have difficulty accounting for?

<table>
<thead>
<tr>
<th>Area of Accounting Difficulty</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Statements</td>
<td>29%</td>
</tr>
<tr>
<td>Inventory</td>
<td>27%</td>
</tr>
<tr>
<td>VAT</td>
<td>26%</td>
</tr>
<tr>
<td>Tax on Profit</td>
<td>25%</td>
</tr>
<tr>
<td>Depreciation</td>
<td>23%</td>
</tr>
<tr>
<td>Bad debts</td>
<td>22%</td>
</tr>
<tr>
<td>Impairment</td>
<td>22%</td>
</tr>
<tr>
<td>Cost of Goods Sold</td>
<td>21%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Area of Accounting Difficulty</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Flow</td>
<td>19%</td>
</tr>
<tr>
<td>Expenses</td>
<td>17%</td>
</tr>
<tr>
<td>Revenue</td>
<td>16%</td>
</tr>
<tr>
<td>Warranties</td>
<td>15%</td>
</tr>
<tr>
<td>License</td>
<td>14%</td>
</tr>
<tr>
<td>Interest Expense and Finance Cost</td>
<td>12%</td>
</tr>
<tr>
<td>Receivables</td>
<td>11%</td>
</tr>
</tbody>
</table>

\[ N = 267 \]

The difficulties reported likely reflect the more common transactions recorded by accountants. For example, most entities commonly need to account for inventory and VAT, thus this is a common concern. In contrast, few companies account for derivatives, thus only a single company reported accounting for derivatives as a problem area.

These common difficulties may be limiting companies’ ability to comply with both the requirement to adhere to accounting standards and also the requirement to have an external audit.
4. Compliance with the Statutory Audit

4.1 Rate of Compliance with the Statutory Audit

Excluding financial institutions and audit firms, this survey found that 47% of businesses required to have an external audit did so. Out of the 363 respondents, there were 115 companies that responded to the survey which met the criteria to be subject to a statutory external audit. These companies were identified by either identifying as a QIP or meeting two out of the following three criteria:

1. 100 or more employees
2. Revenue of $750,000 or more
3. Assets of $500,000 or more

As shown in the figure below, the rate of compliance with the legal requirement to have an external audit was 59%; this figure includes the responses from financial institutions.

Of the 67 companies that reported complying with the statutory audit requirement, 23 were banking or insurance institutions and 2 were audit firms. Financial institutions are subject to strict supervision from the National Bank of Cambodia. Removing financial institutions and the two audit firms, compliance with the statutory audit is broken down as shown in the figure below.

N = 115
There was a trend of compliance by nationality, with foreign owned firms more likely to comply with the statutory audit requirement. Of the businesses that did not comply with the statutory audit, Cambodian owned businesses were a majority, at 60%. Of the companies that did comply, foreign owned companies were a majority at 59%.

4.2 Reasons for Non-Compliance

Respondents that did not have an external audit were asked for the reason for not complying with the external audit requirement. The most common reason given was that it was not required by management.

<table>
<thead>
<tr>
<th>REASON</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management does not need it</td>
<td>54%</td>
</tr>
<tr>
<td>Not prepared</td>
<td>29%</td>
</tr>
<tr>
<td>Too expensive</td>
<td>14%</td>
</tr>
<tr>
<td>Not useful</td>
<td>3%</td>
</tr>
</tbody>
</table>

N = 35

*Responses of companies legally required to have an audit, but not doing so
In addition, all respondents to the survey were asked why they did not have an external audit, including those which were not required to have a statutory audit. The reasons were provided as shown in the table below:

### Reason for Not Having an Audit in 2014

<table>
<thead>
<tr>
<th>REASON</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management does not need it</td>
<td>46%</td>
</tr>
<tr>
<td>Not prepared</td>
<td>22%</td>
</tr>
<tr>
<td>Too expensive</td>
<td>22%</td>
</tr>
<tr>
<td>Not useful</td>
<td>6%</td>
</tr>
<tr>
<td>Owner not aware of requirement</td>
<td>1%</td>
</tr>
<tr>
<td>New company</td>
<td>1%</td>
</tr>
<tr>
<td>Business is too small</td>
<td>1%</td>
</tr>
<tr>
<td>Assurance is provided by internal audit</td>
<td>1%</td>
</tr>
</tbody>
</table>

*N = 139*

Overall, the reasons for not having an audit are broadly the same between companies that are required by law to have an audit and companies that are not required to have an audit.
5. Challenges to Implementing Standards and the Statutory Audit

Survey participants were asked why they did not comply with accounting standards and the statutory audit, and what difficulties they had in doing so. Responses were provided both in the online survey as well as during interviews. There were five main reasons for non-compliance: lack of management interest, lack of skilled staff, cost, confusion with tax basis accounting, and lack of enforcement.

5.1 Lack of Management Interest

The first challenge is that company management and shareholders do not require CIFRS compliance. In many cases, company owners or managers only want cash-basis information and regard preparation of CIFRS compliant reports as a waste of time and resources. In some cases, the management and shareholders simply do not know what CIFRS is, its potential benefits, or even that it is required. A number of finance managers reported that they would be willing to comply if their management or majority shareholders required them to do so. Thus, any effort to expand implementation of IFRS should include outreach to company owners.

5.2 Lack of Skilled Staff

A commonly reported challenge was lack of human resources to implement CIFRS. In a number of cases, the finance managers themselves were unaware of what CIFRS was. Thus, if the finance manager does not know the standards, he or she is unlikely to implement them.

Respondents were asked the difficulty of recruiting qualified accounting staff on a scale of 1-10, with one being difficult and 10 being easy. As shown in the figure below, the responses were skewed toward difficult.

How difficult is it to recruit qualified accounting staff?

- Difficult 1-2: 19%
- 3-4: 25%
- 5-6: 30%
- 7-8: 15%
- Easy 9 - 10: 11%
Most survey and interview participants were interested in developing their knowledge of IFRS and were in many cases actively studying to learn IFRS. However, many preparers reported they needed short term training on specific CIFRS issues related to their work.

Related to technical knowledge, some companies and banks reported concern that CIFRS would not provide a stable platform, that is, would always be changing and difficult to keep up with. For example, the key standard for financial institutions, IFRS 9 Financial Instruments, becomes effective in 2018.

5.3 Cost

Large companies and banks did not express a concern about cost. However, it was common for smaller banks, MFIs and companies to say that the cost of complying with CIFRS was too high.

Costs that were a concern include management time, consulting fees, IT software and IT consulting costs, and accounting staff costs.

5.4 Tax Compliance

A widely reported problem is that there is a difference between CIFRS and the tax basis of accounting. That is, the methods for determining income and expense following CIFRS are different from determining income and expense according to the tax law. This created two problems. First, preparers were not aware of the differences, causing non-compliance with one or the other. Second, there was a burden in terms of time and cost of preparing two sets of financial information.

Banks and MFIs reported that the NBC provided advocacy on behalf of the banks to have certain items of expense recognized by the tax authorities. However, there were uncertainties if the NBC would again lead this advocacy once the methods of calculating income and bad debt expenses were changed under CIFRS, especially the new CIFRS 9.

5.5 Lack of Regulator Enforcement and Guidance

Preparers of financial statements reported that they were hesitant to comply due to lack of regulator action.

Many companies would comply with the requirements of CIFRS and the external audit if these requirements were enforced. One company reported that they immediately implemented CIFRS for SMEs as per the law, had an external audit as per the law, but because no government body asked them if they had done so, the next year they discontinued the external audit.

Lack of guidance was also a frustration, particularly of financial institutions. Banks and MFIs were asked by the National Bank of Cambodia (NBC) to individually evaluate the impact of CIFRS implementation. They suggested that NBC should have led and coordinated an industry-wide gap analysis. Moreover, banks and MFIs suggested that NBC itself was not aware of what CIFRS compliance entailed or required.
6. Recommendations

6.1 The National Accounting Council should set a target rate of compliance and follow up by conducting an annual survey to measure and monitor compliance.

The National Accounting Council will benefit from setting a quantifiable goal and measuring its progress towards that goal. It is difficult to monitor compliance and develop a strategy to achieve compliance if there are no measures of compliance. The NAC will benefit from a regular measure of compliance similar to those in this report. This will inform the NAC as to the effectiveness of its activities, allowing the NAC to strengthen, adapt, or discontinue activities as will best achieve results. Measuring its results will also help ensure that the NAC is operating cost effectively, achieving the greatest results per input.

6.2 The National Accounting Council should prioritize use of resources towards achieving compliance with CIFRS, CIFRS for SMEs and the statutory audit.

The National Accounting Council is constrained by both financial and human resources in achieving its objectives. It has few employees and a limited budget. Excluding the Chairman, the National Accounting Council has a total staff of 12 people. In order to focus on and successfully achieve widespread compliance with CIFRS and the statutory audit, the NAC should limit the scale and scope of its other activities. For example, it would be of limited benefit to create standards for medium or micro sized enterprises if the standards for larger companies are still not respected. If the already limited NAC resources are diverted to new projects, it is unlikely there will be significant gains in compliance with existing regulation.

6.3 The National Accounting Council should continue and intensify its public awareness activities aimed at promoting the requirements and benefits of complying with CIFRS, CIFRS for SMEs and the statutory audit.

The biggest obstacle to compliance reported by finance professionals responding to this survey was the lack of management support for compliance. Among managers, shareholders, and accountants, there remains widespread misunderstanding or lack of awareness of the requirement to comply with CIFRS and what compliance with CIFRS entails. Many accountants were even unaware of how or where they could access the standards. Thus, there will always be a lack of compliance if these stakeholders are not aware of their obligations. Moreover, these stakeholders will be more willing to comply if they are presented with a compelling argument of the benefits of CIFRS and an external audit.

6.4 The National Accounting Council should review the threshold for requiring the statutory audit to determine if the benefits exceed the costs.
NAC activities will be cost effective and risk based if compliance efforts are focused on larger businesses and organisations. This will also help prevent compliance from becoming an unfair cost that disproportionately hurts small businesses. Lack of staff skilled in IFRS contributes to a bottleneck in CIFRS compliance for smaller businesses.

Also, in smaller organisations, shareholders are likely to have closer or even direct oversight of finances. If the owner is also manager, then there is less concern for fraud. Moreover, a small business owner/manager might not have the knowledge or interest to exploit, use and take advantage of CIFRS compliant financial information. Also, the benefits of an external audit are limited when the owner directly manages finance; the benefits of external audit are greatest when there is a separation between ownership and management of operations.
Appendix

Survey Instrument

The survey was an online survey sent as a link via email.

Understanding Accounting Practices in Cambodia

Your code/លខកូដរបស់អ្នក:___________________

1. What type of organization are you?

1. ទំព័រអ្នករបស់អ្នកស្ថិតនៅក្នុងស្ថង់យល់អំពីគណេនយ៍កម្មសិក្សារបស់គាត់ប៉ុណ្ណោះមានដែនការសម្រួលកូដរបស់អ្នក? 
- Co. Ltd /កុមហ៊ុនម្នាក់ការអត្ថប្រយោជន៍
- Co. Plc /កុមហ៊ុនម្នាក់ការអត្ថប្រយោជន៍
- NGO /អង្គកុម្មុយន៍វិទ្យាសាស្រ្ត
- Small business /អង្គកុម្មុយន៍បច្ចេកវិទ្យា

2. What industry is your business or organization involved in?

2. ទំព័រអ្នករបស់អ្នកស្ថិតនៅក្នុងស្ថង់យល់អំពីគណេនយ៍កម្មសិក្សាផ្នែកអំពីកម្មវិធីនៃអ្នករបស់អ្នក?
Choose all that apply / ចូរជ្រើសរើសចរណ៍ច្បារជាប្រយោជន៍កុម្មុយន៍នៃអ្នករបស់អ្នក
- Tourism /ការងារប្រទេស
- Manufacturing /ការប្រតិបត្រ
- Banking and Finance /ការធ្វើឱ្យការហាត់ដោះ
- Education /ការសិក្សា
- Agriculture /ការបោះបង់
- Transportation /ការដំណើរការ
- Trading /ការលក់ទៅក្នុង
- Health Care /ការជោគជ័យ
- Information Technology /ព័ត៌មាន
- Real Estate /ការអានត្រូវបានដោះស្រាយ
- Other /អំពីអ្នករបស់អ្នក___________________

3. Is your company a qualified investment project (QIP)?

3. ឬមានការអនុវត្តន៍សម្រាប់អាយុអាយុអំពីរូបភាពកម្មជាតិ (QIP) មុខងារ បាន?
- Yes / ឬមាន
- No / ឬមិនមាន
- Do not know /ឬមិនដឹង
4. What is the nationality of your main shareholder?

Cambodian / កម្ពុជា
Vietnamese / វៀតណារ
Malaysian / មាលារៀន
Singaporean / សួង្រាមន
Korean / កូរ៉ែ
Chinese / 中
Thai / ឯក
US / អាមេរិក
European / អ៊ឺរ៉ុប
Other / ផ្សេងៗ__

5. About how many investors are there in your company?

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20+

6. About how many employees are at your company?

1 - 10
11 - 50
51 - 99
100+

7. What accounting software does your company use?

8. Has your organization or company experienced fraud, or employee theft of assets in the last 24 months?

Yes / យ៉ៈ
No / យ៉ាង
9. Approximately what was your company’s revenue in 2014?

• $0 - $500,000
• $500,000 - $750,000
• $750,000 - $1,000,000
• $1,000,000 - $2,000,000
• $2,000,000 - $10,000,000
• Above $10,000,000 / រំលែ $10,000,000

10. What is the estimated value of your business assets?

• $0 - $500,000
• $500,000 - $1,000,000
• $2,000,000 - $10,000,000
• Above $10,000,000 / រំលែ $10,000,000

11. Has your company taken a loan from a bank?

• Yes / តើ បាន យោង
• No / ល្កើង

12. About what percent of taxes required by the law does your company pay?

0%  10%  20%  30%  40%  50%  60%  70%  80%  90%  100%

13. What percent of taxes required by the law do other companies in your industry pay?

0%  10%  20%  30%  40%  50%  60%  70%  80%  90%  100%

14. What accounting standard does your company use for financial statements?

• Cash accounting / គណេនយាមច់ <េផrងៗ<Zក់
• CIFRS or IFRS
• CIFRS for SMEs or IFRS for SMEs
• CAS
• GAAP
• No standard / គណេនយាមច់<េផrងៗ<Zក់
• Other / ព្រមុះ________________
15. How difficult is it to recruit qualified accounting staff?

_difficult 1 2 3 4 5 6 7 8 9 10_easy

16. Which of the following do you have difficulty accounting for?

Choose all that apply

- Revenue
- Expenses
- VAT
- Impairment
- Tax on profit
- Depreciation
- Warranties
- Financial statements
- Interest expense and financial cost
- Cash Flow
- Receivables
- Bad debts
- License
- Inventory
- Cost of goods sold
- Other

17. Did your company have an external audit in 2014?

- Yes
- No
18. If you did not have an external audit for 2014, why not?

Choose all that apply.

- Management does not need it / សូវលេខរបស់គ្រូពូកែសម្រាប់ការ។
- Not useful / គ្រាប់ខ្លួនឯង
- Too expensive / ត្រឹមត្រូវ
- Not prepared / ដែលមិនមានការចេញទ្រឹមទ្រាយ
- Other / ឯកសារ____________________

19. What is the next year you plan on having an external audit?

- 2015
- 2016
- 2017
- 2018
- No plan / មិនមានការជ្រើសរើស
- Do not know / មិនដឹង

20. Does your company have an internal audit?

- Yes / មាន
- No / មិន