ACLEDA BANK PLC. AND ITS SUBSIDIARIES

Consolidated and Separate Financial Statements for the year ended 31 December 2020 and Report of the Independent Auditors

CONSOLIDATED AND SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2020

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Report of The Board of Directors

The Board of Directors ("the Board" or "the Directors") hereby submits their report together with the consolidated financial statements of ACLEDA Bank Plc. ("the Bank") and its subsidiaries (collectively referred to as "the Group") and the separate financial statements of the Bank for the year ended 31 December 2020 (hereafter collectively referred to as ("the financial statements").

The Bank

Prior to 1 December 2003, the Bank was a public limited company formed under the laws of the Kingdom of Cambodia to operate as a specialised bank with its Head Office located in Phnom Penh and 14 branches in the Kingdom of Cambodia. On 1 December 2003, the National Bank of Cambodia ("NBC") issued a license for the Bank to become a private commercial bank for a period of three years commencing 1 December 2003. The Bank's license was renewed for an indefinite period on 28 November 2006. The registered office of the Bank is located at No 61, Preah Monivong Boulevard, Sangkat Srah Chork, Khan Daun Penh, Phnom Penh, the Kingdom of Cambodia. The Bank may open additional offices in Cambodia and in other countries, and may change the location of its main registered office upon registering the change with the Ministry of Commerce ("MoC") and receiving approval from NBC.

Principal activities

The Bank operates under regulations by NBC with special focus on providing lending and other financial services to the citizenry and small and medium size enterprises, and to engage in all other activities which the Directors believe support these objectives.

Significant event

Initial Public Offering ("IPO")

On 25 February 2020, the Bank obtained approval in principle for the Bank's IPO from the Board of the Securities and Exchange Commission of Cambodia ("SECC"). The Bank and Yuanta Securities (Cambodia) Plc. ("YSC"), the underwriter, conducted the Book Building process from 3 to 14 March 2020. On 20 March 2020, the result of the Book Building was released, with 2,180 investors participated, in which 95.55% and 4.45% are local and foreign investors, respectively. The final offering price has been set at KHR16,200 (US\$3.97) in accordance with the Book Building and Subscription Procedure approved by the SECC.

The Subscription phase started from 24 March 2020 to 24 April 2020 and the result was released on 30 April 2020 with 4,344,865 shares were subscribed.

The shares of the Bank were listed on the Cambodia Securities Exchange ("CSX") on 25 May 2020.

Financial performance

The audited financial performance of the Group and the Bank for the year ended 31 December 2020 are set out in the consolidated statement of profit or loss and other comprehensive income and separate statement of profit or loss and other comprehensive income on pages 13 - 14 and 20, respectively.

Share capital and share premiums

Share capital and share premium are classified as equity. Incremental costs directly attributable to the issue of new share capital are shown in equity as a deduction, net of tax, from the proceeds. The details of the shares capital are as follows:

	Amounts					
	US\$	KHR'000 (Note 4)				
At 1 January 2020	428,818,154	1,747,433,978				
Proceeds from new shares issued	17,082,105	69,643,742				
Transaction costs	(1,031,025)	(4,203,488)				
Cash proceed – net	16,051,080	65,440,252				
Reclassification to share premium	(11,706,215)	(47,726,239)				
Currency translation difference		(13,003,581)				
At 31 December 2020	433,163,019	1,752,144,412				

On 25 May 2020, the Bank was successfully listed on the Cambodia Securities Exchange ("CSX"). The number of new issued shares are 4,344,865 shares with a par value of KHR4,000 (US\$0.98) per share, at an offering price of KHR16,200 (US\$3.97) per share. All issued shares were fully paid.

Reserves and provisions

There were no material movements to or from reserves and provisions during the year other than those disclosed in the financial statements.

Bad and doubtful loans

Before the financial statements of the Group and the Bank were drawn up, the Directors took reasonable steps to ascertain that action had been taken in relation to the writing off of bad loans and advances or making of provisions for doubtful loans and advances, and satisfied themselves that all known bad loans and advances had been written off and that adequate provisions have been made for bad and doubtful loans and advances.

Bad and doubtful loans (continued)

At the date of this report and based on the best of knowledge, the Directors are not aware of any circumstances which would render the amount written off for bad loans and advances or the amount of the provisions for bad and doubtful loans and advances in the financial statements of the Group and the Bank inadequate to any material extent.

Assets

Before the financial statements of the Group and the Bank were drawn up, the Directors took reasonable steps to ensure that any assets which were unlikely to be realised in the ordinary course of business at their value as shown in the accounting records of the Group and the Bank, have been written down to an amount which they might be expected to realise.

At the date of this report and based on the best of knowledge, the Directors are not aware of any circumstances which would render the values attributed to the assets in the financial statements of the Group and the Bank misleading in any material respect.

Valuation methods

At the date of this report and based on the best of knowledge, the Directors are not aware of any circumstances that have arisen which would render adherence to the existing method of valuation of assets and liabilities in the financial statements of the Group and the Bank misleading or inappropriate in any material respect.

Contingent and other liabilities

At the date of this report, there is:

- (a) no charge on the assets of the Group and the Bank which has arisen since the end of the financial year which secures the liabilities of any other person, and
- (b) no contingent liability in respect of the Group and the Bank that has arisen since the end of the financial year other than in the ordinary course of banking business.

No contingent or other liability of the Group and the Bank has become enforceable, or is likely to become enforceable within the period of twelve months after the end of the financial year which, in the opinion of the Directors, will or may have a material effect on the ability of the Group and the Bank to meet its obligations as and when they become due.

Change of circumstances

At the date of this report, the Directors are not aware of any circumstances, not otherwise dealt with in this report or the financial statements of the Group and the Bank, which would render any amount stated in the financial statements misleading in any material respect.

Items of an unusual nature

The results of the operations of the Group and the Bank for the financial year were not, in the opinion of the Directors, materially affected by any items, transactions or events of a material and unusual nature except for the outbreak of the Novel Coronavirus (Covid-19).

There has not arisen in the interval between the end of the financial period and the date of this report any items, transactions or events of a material and unusual nature likely, in the opinion of the Directors, to substantially affect the results of the operations of the Group and the Bank for the period in which this report is made.

Coronavirus and impact on ECL

The ECL was estimated based on a range of forecast economic conditions as at reporting date. The Novel Coronavirus (Covid-19) outbreak has spread across mainland China, Cambodia and beyond, causing disruption to business and economic activity. The impact on GDP and other key indicators has been considered when determining the severity and likelihood of downside economic scenarios that are used to estimate ECL in which the calculation of the ECL in this current environment is subject to significant uncertainty. Management provides its best estimate on the possible outcomes of Covid-19 on the Group and the Bank, however, this estimate may move materially as events unfold. See Note 3(b) for further details.

The Board of Directors and the Executive Committee

The members of the Board of Directors during the year and at the date of this report are:

- Mr. Chhay Soeun
 - Chairman (Non-executive Director)
 - Member (Executive Director) Mr. Rath Yumeng
 - Member (Executive Director) Mr. Kenichiro Mori
 - Member (Non-executive Director) Ms. Mirjam Janssen
 - Member (Non-executive Director)
 - Mr. Stéphane Mangiavacca Member (Non-executive Director)
- Drs. Pieter Kooi

Dr. In Channy

- Mr. Ian Samuel Lydall
- Mr. Van Sou leng
- Member (Independent Director) Member (Independent Director)
- Member (Independent Director)
 - (appointed on 2 September 2020)

The Board of Directors and the Executive Committee (continued)

The members of the Executive Committee during the year and at the date of this report are:

- Dr. In Channy President & Group Managing Director
- Dr. So Phonnary EVP & Group Chief Operations Officer
- Mrs. Mar Amara
 EVP & Group Chief Financial Officer
- Mr. Rath Yumeng EVP & Group Chief Treasury Officer
- Mr. Ly Thay EVP & Group Chief Administrative Officer
- Mrs. Buth Bunsayha EVP & Group Chief Legal Officer and Corporate Secretary
- Mr. Mach Theary
 EVP & Group Chief Information Officer
- Dr. Loeung Sopheap EVP & Group Chief Risk Officer

The President & Group Managing Director's responsibilities in respect of the financial statements

The President & Group Managing Director, with the advice of the Executive Committee, is responsible for ensuring that the financial statements are properly drawn up so as to present fairly, in all material respects, the financial position of the Group and the Bank as at 31 December 2020 and the financial performance and cash flows for the year then ended in accordance with Cambodian International Financial Reporting Standards ("CIFRSs").

In preparing these financial statements, the President & Group Managing Director with the advice of the Executive Committee is required to:

- i) adopt appropriate accounting policies which are supported by reasonable and prudent judgments and estimates and then apply them consistently;
- ii) comply with the disclosure requirements of CIFRSs or if there have been any departures in the interest of true and fair presentation, this has been appropriately disclosed, explained and quantified in the financial statements;
- iii) maintain adequate accounting records and an effective system of internal controls;
- iv) prepare the financial statements on a going concern basis unless it is inappropriate to assume that the Group and the Bank will continue operations in the foreseeable future; and
- v) effectively control and direct the Group and the Bank in all material decisions affecting the operations and performance and ascertain that such have been properly reflected in the financial statements.

The President & Group Managing Director confirms that the Group and the Bank have complied with the above requirements in preparing the financial statements.

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Mrs. Mar Amara Executive Vice President & Group Chief Financial Officer

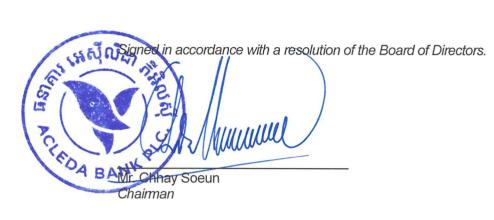
Exec Gail Hay Nan Dr. In Channy Dr. In Channy A Provident & Group Managing Director

Phnom Penh, Kingdom of Cambodia

Date: 25 FEB 2021

Approval of the financial statements

The accompanying financial statements, together with the notes thereto set out on pages 12 to 171, which present fairly, in all material respects, the financial positions of the Group and of the Bank as at 31 December 2020 and the financial performance and cash flows of the Group and of the Bank for the year then ended in accordance with CIFRSs, were approved by the Board of Directors.



Phnom Penh, Kingdom of Cambodia

Date: 2 5 FEB 2021



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REPORT OF THE INDEPENDENT AUDITORS To the shareholders ACLEDA Bank Plc.

Opinion

We have audited the consolidated financial statements of ACLEDA Bank Plc. and its subsidiaries ("the Group") and the separate financial statements of the ACLEDA Bank Plc. ("the Bank"), which comprise the consolidated and separate statements of financial position of the Group and the Bank as at 31 December 2020, and the consolidated and the separate statements of profit or loss and other comprehensive income, changes in equity and cash flows for the year then ended, and notes, comprising significant accounting policies and other explanatory information as set out on pages 12 to 171 (hereafter referred to as "the financial statements").

In our opinion, the financial statements present fairly, in all material respects, the financial positions of the Group and of the Bank as at 31 December 2020, and of their financial performance and cash flows for the year then ended in accordance with Cambodian International Financial Reporting Standards ("CIFRSs").

Basis for Opinion

We conducted our audit in accordance with Cambodian International Standards on Auditing ("CISAs"). Our responsibilities under those standards are further described in the *Auditors' Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Group and Bank in accordance with the ethical requirements that are relevant to our audit of the financial statements in the Kingdom of Cambodia, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated and separate financial statements of the current year. These matters were addressed in the context of our audit of the consolidated and separate financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

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The key audit matter	How the matter was addressed in our audit
Expected Credit Loss:	
At 31 December 2020, the Group's and Bank's loans to customers comprised 68.25% and 67.29% of Total Assets, respectively.	We tested the design, implementation and operating effectiveness of key controls surrounding the determination of ECL allowances.
CIFRS 9 "Financial Instruments", introduces the expected credit loss (ECL) impairment model. ECL applies to financial assets measured at amortised cost.	We involved our Information Technology (IT) specialists to test the (i) general and specific IT controls over loan overdue report, including access rights and change management controls.
The Group and the Bank had developed quantitative models to determine the ECL allowances for credit exposures. Significant judgement is applied in developing the models and	In order to ascertain the accuracy of key inputs to the loan overdue report, we checked a sample of loan against source documentation.
in determining the relevant inputs and applicable assumptions. In respect of non-credit impaired exposures,	We assessed the reasonableness of the criteria used for determination of "significant increase in credit risk".
significant judgement and assumptions are required in areas including:	We involved our ECL specialists in the following areas:
Development of ECL model parameters, including the probability of default (PD), loss given default (LGD) and exposure at default	 Review the Group's and Bank's classification of the financial instruments;
(EAD) for each portfolio;Selection of criteria to determine whether a	 Review the Group's and Bank's segmentations in ECL modelling;
 credit exposure has exhibited "significant increase in credit risk", thus requiring lifetime ECL allowance; and Determination of relevant macroeconomic 	 Assess the Group's and Bank's ECL modelling methodology for a sample of key portfolios against the requirements of CIFRS 9; and
factors to incorporate into the models.	 Review the computation of ECL for selected loans.
management judgement and estimation are applied in (i) identifying impaired exposures; (ii) estimating the related recoverable amounts; and (iii) where applicable, determining collateral values and timing of expected cash flows.	We also assessed the reasonableness of the probability weighting of the economic scenarios applied, including the use of management overlay for impaired (stage 3) and non-impaired (stage 1 and stage 2) accounts.
As a result of the significance of loans to customers and the related estimation uncertainty over ECL allowances, the impairment of loans to customers is considered a key audit matter.	For a sample of loans, we independently re- calculated the ECL allowance to test the mathematical accuracy of the modelled calculations produced by the Group and the Bank.

Other Information

Management is responsible for the other information. The other information obtained at the date of this auditors' report is the information included in the Report of the Board of Directors as set out on pages 1 to 7.



Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

If, based on the work we have performed on the other information obtained prior to the date of this auditors' report, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Management and those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with CIFRSs, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Group's and the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group and the Bank or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's and the Bank's financial reporting process.

Auditors' Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with CISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with CISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to
 fraud or error, design and perform audit procedures responsive to those risks, and obtain audit
 evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not
 detecting a material misstatement resulting from fraud is higher than for one resulting from error,
 as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override
 of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's and the Bank's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.



- Conclude on the appropriateness of management's use of the going concern basis of accounting
 and, based on the audit evidence obtained, whether a material uncertainty exists related to events
 or conditions that may cast significant doubt on the Group's and the Bank's ability to continue as a
 going concern. If we conclude that a material uncertainty exists, we are required to draw attention in
 our auditors' report to the related disclosures in the financial statements or, if such disclosures are
 inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to
 the date of our auditors' report. However, future events or conditions may cause the Group and the
 Bank to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the subsidiaries within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current year and are therefore the key audit matter. We describe this matter in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

For KPMG Cambodia Ltd

Nge Huy Engagement Partner

Phnom Penh, Kingdom of Cambodia

25 February 2021

CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
ASSETS					
Cash on hand	5	412,759,051	421,527,238	1,669,610,361	1,717,723,495
Deposits and placements with other banks	6	534,653,146	587,730,531	2,162,671,976	2,395,001,914
Financial investments	7	566,674,523	527,474,976	2,292,198,446	2,149,460,527
Loans and advances, net	8	4,471,300,618	3,846,020,519	18,086,411,000	15,672,533,615
Other assets	9	22,766,913	17,529,833	92,092,163	71,434,070
Statutory deposits	10	360,377,008	587,336,099	1,457,724,997	2,393,394,603
Property and equipment	12	127,546,441	131,159,792	515,925,354	534,476,153
Intangible assets	13	14,690,675	8,998,993	59,423,780	36,670,896
Right-of-use assets	14	29,529,768	32,569,457	119,447,912	132,720,537
Deferred tax assets, net	15	11,195,845	14,814,354	45,287,193	60,368,494
TOTAL ASSETS		6,551,493,988	6,175,161,792	26,500,793,182	25,163,784,304
LIABILITIES AND EQUITY LIABILITIES					
Deposits and placements of other banks and financial institutions	16	317,009,459	285,175,145	1,282,303,262	1,162,088,716
Deposits from customers	10	4,294,286,048	4,082,722,853	17,370,387,064	16,637,095,626
Other liabilities	17	4,294,200,040	4,002,722,055 58,810,875	257,873,232	239,654,316
Borrowings	18	542,398,916	564,971,701	2,194,003,615	2,302,259,682
Subordinated debts	19 20	167,158,623	139,302,580	676,156,630	2,302,239,082 567,658,014
Current income tax liabilities	20 29(a)	30,292,370	30,459,303	122,532,637	124,121,660
Lease liabilities	23(a) 21	28,617,902	30,915,939	115,759,414	125,982,451
Employee benefits	21	18,354,055	18,341,796	74,242,152	74,742,819
TOTAL LIABILITIES	22		5,210,700,192	22,093,258,006	21,233,603,284
		0,-01,000,-01	0,210,700,102	22,000,200,000	21,200,000,204
EQUITY Share capital	23	433,163,019	428,818,154	1,752,144,412	1,747,433,978
Share premiums	23 23	11,706,215	420,010,104	47,351,640	1,747,455,976
Reserves	23 33	503,094,236	- 414,748,726	2,048,708,997	- 1,708,085,266
	33		, ,		
Retained earnings TOTAL EQUITY		141,662,037	120,894,720	559,330,127	474,661,776
		1,089,625,507	964,461,600	4,407,535,176	3,930,181,020
Non-controlling interests					
TOTAL LIABILITIES AND EQUITY		6,551,493,988	6,175,161,792	26,500,793,182	25,163,784,304

CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Interest income calculated using the effective	04	F4F 004 470	400 540 400	0 400 040 470	4 050 240 424
interest method Interest expense	24 25	515,094,476 (150,777,317)	483,543,466 (156,872,680)	2,100,040,179 (614,719,121)	1,959,318,124 (635,648,099)
Net interest income	20	364,317,159	326,670,786	1,485,321,058	1,323,670,025
Fee and commission income	26	45,775,165	48,734,619	186,625,348	197,472,676
Fee and commission expense	20	(1,742,125)	(996,897)	(7,102,644)	(4,039,427)
Net fee and commission income		44,033,040	47,737,722	179,522,704	193,433,249
Allowances for impairment losses on loans and advances, deposits and placements with other banks and other receivables Allowance for impairment losses on off-balance	35.1(f)	(20,794,031)	(23,411,205)	(84,777,264)	(94,862,203)
sheet commitments		54,156	87,989	220,794	356,531
Net impairment losses		(20,739,875)	(23,323,216)	(84,556,470)	(94,505,672)
Net income after allowance for impairment		387,610,324	351,085,292	1,580,287,292	1,422,597,602
Other incomes General and administrative expenses	27 28	18,351,358 (225,926,220)	17,849,723 (215,412,394)	74,818,487 (921,101,199)	72,327,078 (872,851,020)
Profit before income tax		180,035,462	153,522,621	734,004,580	622,073,660
Income tax expense	29(b)	(38,542,872)	(32,662,809)	(157,139,291)	(132,349,702)
Profit for the year (carried forward to next page)		141,492,590	120,859,812	576,865,289	489,723,958

CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Profit for the year (brought forward from previous page)		141,492,590	120,859,812	576,865,289	489,723,958
Other comprehensive income: Items that will not be reclassified to profit or loss: Remeasurement of employee benefit obligations		169,447	34,908	690,835	141,447
Items that are or may be reclassified subsequently to profit or loss:					
Currency translation differences	-	-		(8,160,026)	7,330,165
Other comprehensive income for the year	_	169,447	34,908	(7,469,191)	7,471,612
Total comprehensive income for the year	=	141,662,037	120,894,720	569,396,098	497,195,570
Profit for the year attributable to: Owners of the Bank Non-controlling interests		141,492,590 -	120,859,812 -	576,865,289 -	489,723,958
	-	141,492,590	120,859,812	576,865,289	489,723,958
Total comprehensive income attributable to: Owners of the Bank Non-controlling interests		141,662,037	120,894,720	569,396,098	497,195,570
	-	141,662,037	120,894,720	569,396,098	497,195,570
	-				

The earnings per share attributable to shareholders of Bank during the year are as follows:

Basic earnings per share	30	0.33	0.29	1.32	1.20
Diluted earnings per share	30	0.33	0.29	1.32	1.20

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2020

Attributable to equity holders of the Parent														
	Share	capital	Share pre	miums	Res	erves	Retained	earnings	То	tal	Non-controll	ing interest	Total	equity
	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000
		(Note 4)		(Note 4)		(Note 4)		(Note 4)		(Note 4)		(Note 4)		(Note 4)
As at 1 January 2020	428,818,154	1,747,433,978	-	-	414,748,726	1,708,085,266	120,894,720	474,661,776		3,930,181,020	-	-		3,930,181,020
Profit for the year	-	-	-	-	-	-	141,492,590	576,865,289	141,492,590	576,865,289	-	-	141,492,590	576,865,289
Other comprehensive incorne: Remeasurement of employee benefit obligations	-	-	-	-	-	-	169,447	690,835	169,447	690,835	-	-	169,447	690,835
Currency translation differences	-	-	-	-	-	(8,160,026)	-	-		(8,160,026)	-	-	-	(8,160,026)
Total comprehensive income for the year		-	-		-	(8,160,026)	141,662,037	577,556,124	141,662,037	569,396,098		-	141,662,037	569,396,098
Transaction with owners:														
Conversion of retained earnings to share capital	-	-	-	-	(4,451,864)	(18,150,250)	4,451,864	18,150,250	-	-	-	-	-	-
Dividend paid	-	-	-	-	-	-	(32,718,825)	(133,394,650)	(32,718,825)	(133,394,650)	-	-	(32,718,825)	(133,394,650)
Transfers from retained earnings to general reserves	-	-	-	-	66,285,795	270,247,186	(66,730,585)	(272,060,595)	(444,790)	(1,813,409)	-	-	(444,790)	(1,813,409)
Share issued Transfer from retained earnings to regulatory	4,344,865	17,714,015	11,706,215	47,726,239	-	-	-	-	16,051,080	65,440,254	-	-	16,051,080	65,440,254
reserves	-	-	-	-	25,897,174	105,582,778	(25,897,174)	(105,582,778)	-	-	-	-	-	-
Currency translation differences - foreign subsidiaries	-	-	-	-	614,405	2,504,929	-	-	614,405	2,504,929	-	-	614,405	2,504,929
Currency translation differences		(13,003,581)	-	(374,599)	-	(11,400,886)	-	-	-	(24,779,066)		-	-	(24,779,066)
Total transactions with owners:	4,344,865	4,710,434	11,706,215	47,351,640	88,345,510	348,783,757	(120,894,720)	(492,887,773)	(16,498,130)	(92,041,942)	-	-	(16,498,130)	(92,041,942)
As at 31 December 2020	433,163,019	1,752,144,412	11,706,215	47,351,640	503,094,236	2,048,708,997	141,662,037	559,330,127	1,089,625,507	4,407,535,176			1,089,625,507	

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

	Attributable to equity he		nolders of the l	Parent	-								
	Share capital		Rese	Reserves Reta		earnings	То	tal	Non-controlli	ng interest	Total	Total equity	
	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000	US\$	KHR'000	
		(Note 4)		(Note 4)		(Note 4)		(Note 4)		(Note 4)		(Note 4)	
As at 1 January 2019	395,224,105	1,588,010,454	377,798,286	1,529,226,903	79,817,291	309,472,482	852,839,682	3,426,709,839	-	-	852,839,682	3,426,709,839	
Adjustment on initial application of CIFRS 16, net of tax				<u> </u>							-		
Restated balance at 1 January 2019	395,224,105	1,588,010,454	377,798,286	1,529,226,903	79,817,291	309,472,482	852,839,682	3,426,709,839	-	-	852,839,682	3,426,709,839	
Profit for the year Other comprehensive income:	-	-	-	-	120,859,812	489,723,958	120,859,812	489,723,958	-	-	120,859,812	489,723,958	
Remeasurement of employee benefit obligations	-	-	-	-	34,908	141,447	34,908	141,447	-	-	34,908	141,447	
Currency translation differences		-	-	7,330,165	-	-	-	7,330,165		-	-	7,330,165	
Total comprehensive income for the year	<u> </u>	<u> </u>	<u> </u>	7,330,165	120,894,720	489,865,405	120,894,720	497,195,570	<u> </u>	-	120,894,720	497,195,570	
Transaction with owners:													
Dividends in share capital	33,594,049	136,761,373	-	-	(33,594,049)	(136,761,373)	-	-	-	-	-	-	
Dividend paid	-	-	-	-	(8,418,273)	(34,060,333)	(8,418,273)	(34,060,333)	-	-	(8,418,273)	(34,060,333)	
Transfers from retained earnings to general reserves	-	-	50,210,960	204,408,818	(50,210,960)	(204,408,818)	-	-	-	-	-	-	
Transfer from regulatory reserves to retained			, -,	- ,,	(,	(-,,,							
earnings	-	-	(12,405,991)	(50,554,413)	12,405,991	50,554,413	-	-	-	-	-	-	
Acquisition of non-controlling interest in AMM Currency translation differences - foreign	-	-	14,279,344	58,188,327	-	-	14,279,344	58,188,327	-	-	14,279,344	58,188,327	
subsidiaries	-	-	(15,133,873)	(61,670,532)	-	-	(15,133,873)	(61,670,532)	-	-	(15,133,873)	(61,670,532)	
Currency translation differences		22,662,151	-	21,155,998		-	-	43,818,149		-	-	43,818,149	
Total transactions with owners:	33,594,049	159,423,524	36,950,440	171,528,198	(79,817,291)	(324,676,111)	(9,272,802)	6,275,611			(9,272,802)	6,275,611	
As at 31 December 2019	428,818,154	1,747,433,978	414,748,726	1,708,085,266	120,894,720	474,661,776	964,461,600	3,930,181,020	-	-	964,461,600	3,930,181,020	

CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Cash flows from operating activities					
Profit for the year		141,492,590	120,859,812	576,865,289	489,723,958
Adjustments for:		,,			,
Depreciation	12	21,249,218	21,426,470	86,633,062	86,820,056
Amortisation	13	3,667,583	3,537,457	14,952,736	14,333,776
Depreciation on right-of-use assets	14	10,627,120	10,469,819	43,326,768	42,423,707
Adjustments of property and equipment		18,534	47,552	75,563	192,681
Adjustments of intangible assets		290,284	405,017	1,183,488	1,641,129
Provident fund expenses		-	229,211	-	928,763
Allowances for impairment losses	8	20,739,875	23,323,216	84,556,470	94,505,672
Retirement benefits	22(a)	1,697,341	1,557,654	6,920,060	6,311,615
Seniority indemnity benefits	22(c)	6,563,719	3,233,915	26,760,282	13,103,824
Income tax expense	29(b)	38,542,872	32,662,809	157,139,291	132,349,702
Currency translation reserves		614,405	(854,529)	2,504,929	(3,462,552)
Net interest income		(364,317,159)	(326,670,786)	(1,485,321,058)	(1,323,670,025)
Gains on disposals of property and		(000 500)	(70,404)	(4 500 500)	(000.004)
equipment, and intangible assets		(369,528)	(76,481)	(1,506,566)	(309,901)
Unrealised exchange gains	-	(262,358)	(1,098,279)	(1,069,635)	(4,450,225)
	-	(119,445,504)	(110,947,143)	(486,979,321)	(449,557,820)
Changes in:					
Loans and advances		(646,063,530)	(274,262,158)	(2,634,001,012)	(1,111,310,264)
Deposits and placements with other banks		181,602,086	(1,127,269)	740,391,705	(4,567,694)
Statutory deposits		43,449,288	(46,761,126)	177,142,747	(189,476,083)
Other assets		(5,560,237)	4,933,119	(22,669,086)	19,988,998
Deposits from customers		211,563,195	500,799,381	862,543,146	2,029,239,092
Deposits and placements from other banks					
and financial institutions		31,834,314	(3,627,445)	129,788,498	(14,698,407)
Provident fund		-	210,110	-	851,366
Career development		1,312,641	1,385,493	5,351,637	5,614,018
Other liabilities	-	10,301,728	(6,520,957)	42,000,145	(26,422,918)
Net cash (used in)/generated from operation	S _	(291,006,019)	64,082,005	(1,186,431,541)	259,660,288
Interest received		515,468,173	481,469,555	2,101,563,741	1,950,914,637
Interest paid		(154,011,306)	(147,723,120)	(627,904,095)	(598,574,082)
Income tax paid	29(a)	(35,064,652)	(19,216,756)	(142,958,586)	(77,866,295)
Provident fund paid	(~)	(,- - ,,,,,,,,,,,,,-	(430,973)	-	(1,746,303)
Retirement benefits paid	22(a)	(216,840)	(195,444)	(884,057)	(791,939)
Career development paid	22(b)	(2,085,315)	(1,465,393)	(8,501,829)	(5,937,772)
Seniority benefits paid	22(c)	(6,998,257)	(6,225,869)	(28,531,894)	(25,227,221)
Net cash generated from operating activities	-	26,085,784	370,294,005	106,351,739	1,500,431,313

CONSOLIDATED STATEMENT OF CASH FLOWS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Cash flows from investing activities Financial investments Purchases of property and equipment Purchases of intangible assets Proceeds from disposals of property and equipment Net cash (used in)/generated from investing activities	12 13 -	22,946,576 (17,704,489) (9,689,231) 408,958 (4,038,186)	22,407,441 (14,830,497) (2,027,251) <u>361,117</u> <u>5,910,810</u>	93,553,190 (72,181,202) (39,502,995) <u>1,667,322</u> (16,463,685)	90,794,951 (60,093,174) (8,214,421) 1,463,246 23,950,602
Cash flows from financing activities Payments of dividends Payment tax on ABL's increase capital Repayments of borrowings Proceeds from borrowings Repayments of subordinated debts Proceeds from subordinated debts Proceeds from share issuance Proceeds from share premium Payments of lease liabilities	21	(32,718,825) (444,790) (201,163,263) 178,590,478 (7,143,957) 35,000,000 4,344,865 11,706,215 (11,833,274)	(8,418,273) - (454,555,076) 229,266,385 (32,000,000) 93,833,667 - - (11,282,470)	(133,394,650) (1,813,409) (820,142,623) 728,113,379 (29,125,913) 142,695,000 17,714,015 47,726,239 (48,244,258)	(34,110,842) - (1,841,857,168) 928,987,392 (129,664,000) 380,214,019 - (45,716,568)
Net cash used in financing activities Net (decrease)/increase in cash and cash equivalents Cash and cash equivalents at the beginning of the vear	-	(23,662,551) (1,614,953) 1,498,720,457	(183,155,767) 193,049,048 1,305,671,409	(96,472,220) (6,584,166) 6,107,285,862	(742,147,167) 782,234,748 5,246,187,721
Currency translation difference Cash and cash equivalents at the end of the year	- 31	1,497,105,504	1,498,720,457	(44,909,932) 6,055,791,764	6,107,285,862

SEPARATE STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
ASSETS					
Cash on hand	5	400,816,126	410,955,867	1,621,301,230	1,674,645,158
Deposits and placements with other banks	6	507,629,407	558,612,340	2,053,360,951	2,276,345,286
Financial investments	7	566,674,523	527,474,976	2,292,198,446	2,149,460,527
Loans and advances, net	8	4,292,649,159	3,686,578,943	17,363,765,848	15,022,809,193
Other assets	9	20,256,110	15,667,540	81,935,965	63,845,226
Statutory deposits	10	356,753,756	583,195,741	1,443,068,943	2,376,522,645
Investments in subsidiaries	11	91,115,571	91,135,571	368,562,485	371,377,452
Property and equipment	12	90,836,422	92,911,344	367,433,327	378,613,728
Intangible assets	13	13,884,558	7,915,362	56,163,037	32,255,100
Right-of-use assets	14	26,182,172	28,847,850	105,906,886	117,554,989
Deferred tax assets, net	15	12,685,947	14,007,743	51,314,656	57,081,553
TOTAL ASSETS		6,379,483,751	6,017,303,277	25,805,011,774	24,520,510,857
LIABILITIES AND EQUITY LIABILITIES					
Deposits and placements of other banks and	1				
financial institutions	16	296,764,554	274,277,721	1,200,412,621	1,117,681,713
Deposits from customers	17	4,180,268,737	3,982,146,559	16,909,187,041	16,227,247,228
Other liabilities	18	62,408,882	56,597,551	252,443,928	230,635,021
Borrowings	19	507,352,916	518,068,128	2,052,242,545	2,111,127,622
Subordinated debts	20	167,158,623	139,302,580	676,156,630	567,658,014
Current income tax liabilities	29(a)	27,950,334	29,175,560	113,059,101	118,890,407
Lease liabilities	21	25,772,385	27,789,168	104,249,297	113,240,860
Employee benefits	22	17,781,763	17,667,477	71,927,231	71,994,969
TOTAL LIABILITIES		5,285,458,194	5,045,024,744	21,379,678,394	20,558,475,834
EQUITY					
Share capital	23	433,163,019	428,818,154	1,752,144,412	1,747,433,978
Share premiums	23	11,706,215	-	47,351,640	-
Reserves	33	510,741,554	425,709,612	2,079,357,802	1,752,368,656
Retained earnings		138,414,769	117,750,767	546,479,526	462,232,389
TOTAL EQUITY		1,094,025,557	972,278,533	4,425,333,380	3,962,035,023
TOTAL LIABILITIES AND EQUITY	-	6,379,483,751	6,017,303,277	25,805,011,774	24,520,510,857

SEPARATE STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Interest income calculated using the effective interest method Interest expense Net interest income	24 25	478,739,341 (139,856,147) 338,883,194	452,651,289 (146,483,987) 306,167,302	1,951,820,293 (570,193,511) 1,381,626,782	1,834,143,023 (593,553,115) 1,240,589,908
Fee and commission income Fee and commission expense Net fee and commission income	26	42,354,094 (1,526,370) 40,827,724	46,048,224 (667,992) 45,380,232	172,677,641 (6,223,010) 166,454,631	186,587,404 (2,706,704) 183,880,700
Allowances for impairment losses for loans and advances, deposits and placements with other banks and other receivables Allowances for impairment losses on off-balance sheet commitments	35.1(f)	(16,247,676) <u>132,082</u>	(21,780,632) (360,354)	(66,241,775) 538,498	(88,255,121) (1,460,154)
Net impairment losses		(16,115,594)	(22,140,986)	(65,703,277)	(89,715,275)
Net income after allowance for impairment		363,595,324	329,406,548	1,482,378,136	1,334,755,333
Other incomes General and administrative expenses	27 28	16,662,748 (208,103,757)	16,233,764 (197,413,910)	67,934,024 (848,439,017)	65,779,212 (799,921,163)
Profit before income tax		172,154,315	148,226,402	701,873,143	600,613,382
Income tax expenses	29(b)	(33,812,139)	(30,339,623)	(137,852,091)	(122,936,153)
Profit for the year		138,342,176	117,886,779	564,021,052	477,677,229
Other comprehensive income: Items that will not be reclassified to profit or loss:					
Remeasurement of employee benefit obligations Currency translation differences		72,593	(136,012) -	295,962 (7,961,797)	(551,121) 7,153,755
Other comprehensive income during the year		72,593	(136,012)	(7,665,835)	6,602,634
Total comprehensive income for the year		138,414,769	117,750,767	556,355,217	484,279,863
Profit attributable to: Equity holders of the Bank		138,342,176	117,886,779	564,021,052	477,677,229
Total comprehensive income attributable to: Equity holders of the Bank	•	138,414,769	117,750,767	556,355,217	484,279,863

SEPARATE STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2020

	Attributable to equity holders of the Bank									
	Share capital		Share premium		Reserves		Retained earnings		Total equity	
	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)
As at 1 January 2020	428,818,154	1,747,433,978	-	-	425,709,612	1,752,368,656	117,750,767	462,232,389	972,278,533	3,962,035,023
Profit for the year	-	-	-	-	-	-	138,342,176	564,021,052	138,342,176	564,021,052
Other comprehensive income:										
Remeasurement of employee benefit obligations	-	-	-	-	-	-	72,593	295,962	72,593	295,962
Currency translation difference	-		-	-		(7,961,797)			-	(7,961,797)
Total comprehensive income for the year				-		(7,961,797)	138,414,769	564,317,014	138,414,769	556,355,217
Transaction with owners:										
Dividend paid	-	-	-	-	-	-	(32,718,825)	(133,394,650)	(32,718,825)	(133,394,650)
Transfer from retained earnings to general reserves	-	-	-	-	66,949,305	272,952,316	(66,949,305)	(272,952,316)	-	-
Share issued	4,344,865	17,714,015	11,706,215	47,726,239	-	-	-	-	16,051,080	65,440,254
Transfer from retained earnings to regulatory reserves	-	-	-	-	18,082,637	73,722,911	(18,082,637)	(73,722,911)	-	-
Currency translation difference	-	(13,003,581)	-	(374,599)	-	(11,724,284)	-	-	-	(25,102,464)
Total transactions with owners:	4,344,865	4,710,434	11,706,215	47,351,640	85,031,942	334,950,943	(117,750,767)	(480,069,877)	(16,667,745)	(93,056,860)
As at 31 December 2020	433,163,019	1,752,144,412	11,706,215	47,351,640	510,741,554	2,079,357,802	138,414,769	546,479,526	1,094,025,557	4,425,333,380

SEPARATE STATEMENT OF CHANGES IN EQUITY (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

	Attributable to equity holders of the Bank								
-	Share	capital	Reser	ves	Retained	earnings	Total equity		
-	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	
As at 1 January 2019 Adjustment on initial application of CIFRS 16, net of	395,224,105	1,588,010,454	389,730,923	1,576,960,188	77,991,011	302,346,542	862,946,039	3,467,317,184	
tax Restated balance as at 1 January 2019	- 395,224,105	- 1,588,010,454	- 389,730,923	- 1,576,960,188	- 77,991,011	- 302,346,542	- 862,946,039	- 3,467,317,184	
Profit for the year Other comprehensive income:	-	-	-	-	117,886,779	477,677,229	117,886,779	477,677,229	
Remeasurement of employee benefit obligations Currency translation difference	-	-	-	- 7,153,755	(136,012) -	(551,121) -	(136,012) -	(551,121) 7,153,755	
Total comprehensive income for the year	-	-	-	7,153,755	117,750,767	477,126,108	117,750,767	484,279,863	
Transaction with owners: Dividends in share capital	33,594,049	136,761,373	-	-	(33,594,049)	(136,761,373)	-	-	
Dividend paid Transfers from retained earnings to general reserves	-	-	- 48,650,597	- 198,056,580	(8,418,273) (48,650,597)	(34,060,333) (198,056,580)	(8,418,273) -	(34,060,333) -	
Transfer from regulatory reserves to retained earnings Currency translation difference	-	- 22,662,151	(12,671,908) -	(51,638,025) 21,836,158	12,671,908	51,638,025	-	- 44,498,309	
Total transaction with owners	33,594,049	159,423,524	35,978,689	168,254,713	(77,991,011)	(317,240,261)	(8,418,273)	10,437,976	
As at 31 December 2019	428,818,154	1,747,433,978	425,709,612	1,752,368,656	117,750,767	462,232,389	972,278,533	3,962,035,023	

SEPARATE STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Cash flows from operating activities					
Profit for the year		138,342,176	117,886,779	564,021,052	477,677,229
Adjustments for:		,,	,,		
Depreciation charge	12	19,181,151	19,275,787	78,201,553	78,105,489
Amortisation charge	13	3,339,510	3,182,821	13,615,182	12,896,791
Depreciation charge on right-of-use assets	14	9,770,638	9,647,871	39,834,891	39,093,173
Adjustments of property and equipment		18,534	42,797	75,563	173,413
Adjustments of intangible assets		290,284	391,150	1,183,488	1,584,940
Allowances for impairment losses	8	16,115,594	22,140,986	65,703,277	89,715,275
Retirement benefits	22(a)	1,577,677	1,402,077	6,432,189	5,681,218
Seniority indemnity benefits	22(c)	6,378,738	3,171,116	26,006,115	12,849,362
Income tax expense		33,812,139	30,339,623	137,852,091	122,936,153
Net interest income		(338,883,194)	(306,167,302)	(1,381,626,782)	(1,240,589,908)
Gains on disposals of property and					
equipment, and intangible assets		(326,299)	(84,637)	(1,330,321)	(342,949)
Unrealised exchange gains	-	(227,794)	(1,019,390)	(928,716)	(4,130,570)
		(110,610,846)	(99,790,322)	(450,960,418)	(404,350,384)
Changes in:	-				
Loans and advances		(622,248,079)	(248,474,859)	(2,536,905,418)	(1,006,820,129)
Deposits and placements with other banks		181,359,387	-	739,402,221	-
Statutory deposits		42,047,558	(45,242,469)	171,427,894	(183,322,484)
Other assets		(4,910,075)	4,473,609	(20,018,376)	18,127,064
Deposits from customers		198,122,178	480,664,056	807,744,120	1,947,650,755
Deposits and placements of other banks					
and financial institutions		22,486,833	(10,286,581)	91,678,818	(41,681,226)
Career development		1,312,641	1,385,493	5,351,637	5,614,018
Other liabilities	-	11,583,756	(6,460,668)	47,226,973	(26,178,627)
Net cash (used in)/generated from					
operations	-	(280,856,647)	76,268,259	(1,145,052,549)	309,038,987
Interest received		479,113,715	452,668,423	1,953,346,616	1,834,212,450
Interest paid		(143,620,714)	(138,672,994)	(585,541,651)	(561,902,972)
•	20(a)		· · · /		
Income tax paid Retirement benefits paid	29(a) 22(a)	(33,715,569) (143,004)	(17,140,531) (148,350)	(137,458,375) (583,027)	(69,453,432) (601,114)
Career development paid	22(a) 22(b)	(143,004) (2,085,315)	(146,300) (1,465,393)	(8,501,829)	(5,937,772)
Seniority benefits paid	22(D) 22(C)	(6,815,248)	(1,405,393) (6,112,312)	(0,501,629) (27,785,766)	(24,767,088)
Net cash generated from operating	22(0)	(0,010,240)	(0,112,312)	(21,100,100)	(24,101,000)
activities	-	11,877,218	365,397,102	48,423,419	1,480,589,059

SEPARATE STATEMENT OF CASH FLOWS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Cash flows from investing activities Financial investments Purchases of property and equipment Purchases of intangible assets Investment in subsidiaries Proceeds from disposals of property and equipment Net cash used in investing activities	12 13	22,946,576 (17,093,791) (9,603,297) 20,000 <u>348,105</u> (3,382,407)	22,407,441 (13,172,435) (1,750,656) (7,965,290) <u>339,449</u> (141,491)	93,553,190 (69,691,386) (39,152,642) 81,540 <u>1,419,224</u> (13,790,074)	90,794,951 (53,374,707) (7,093,658) (32,275,355) <u>1,375,447</u> (573,322)
Cash flows from financing activities Payments of dividends Repayments of borrowings Proceeds from borrowings Repayments of subordinated debts Proceeds from subordinated debt Proceeds from share issuance Proceeds from share premium Payment of lease liabilities	21	(32,718,825) (186,213,293) 175,498,081 (7,143,957) 35,000,000 4,344,865 11,706,215 (10,883,406)	(8,418,273) (429,912,785) 194,388,451 (32,000,000) 93,833,667 - (10,452,195)	(133,394,650) (759,191,596) 715,505,676 (29,125,913) 142,695,000 17,714,015 47,726,239 (44,371,646)	(34,110,842) (1,742,006,605) 787,662,003 (129,664,000) 380,214,019 - - (42,352,294)
Net cash used in financing activities Net (decrease)/increase in cash and cash equivalents Cash and cash equivalents at the beginning of the year Currency translation difference		(10,410,320) (1,915,509) 1,459,613,448 -	(192,561,135) 172,694,476 1,286,918,972 -	(42,442,875) (7,809,530) 5,947,924,801 (43,727,108)	(780,257,719) 699,758,018 5,170,840,429 77,326,354
Cash and cash equivalents at the end of the year	31	1,457,697,939	1,459,613,448	5,896,388,163	5,947,924,801

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2020

1. Background information

Prior to 1 December 2003, ACLEDA Bank Plc. ("the Bank") was a public limited company formed under the Laws of the Kingdom of Cambodia to operate as a specialised bank with a Head Office located in Phnom Penh and 14 branches in the Kingdom of Cambodia. On 1 December 2003, the National Bank of Cambodia ("NBC") issued a license for the Bank to become a private commercial bank for a period of three years commencing 1 December 2003. The Bank's license was renewed for an indefinite period on 28 November 2006.

The registered office of the Bank is located at No 61, Preah Monivong Boulevard, Sangkat Srah Chork, Khan Daun Penh, Phnom Penh, the Kingdom of Cambodia.

The Bank operates under the supervision of the National Bank of Cambodia ("NBC") with special focus on providing lending and other financial services to the citizenry and small and medium enterprises and to engage in all other activities which the Board believes support these objectives.

The principal activities of the subsidiaries are disclosed in Note 11 to the financial statements.

As at 31 December 2020, the Bank and its subsidiaries had 13,704 employees (2019: 13,655 employees).

The financial statements were authorised for issue by the Board of Directors on 25 February 2021.

2. Summary of significant accounting policies

The significant accounting policies adopted in the preparation of the financial statements are set out below. These policies have been consistently applied to all the years presented, unless otherwise stated.

(a) Basis of preparation

The financial statements of the Group and the Bank have been prepared in accordance with Cambodian International Financial Reporting Standards ("CIFRSs"). The consolidated financial statements have been prepared on a historical cost basis.

The preparation of financial statements in conformity with CIFRSs requires the use of certain critical accounting estimates. It also requires the Directors to exercise judgment in the process of applying the Group's and the Bank's accounting policies. Areas involving a higher degree of judgment or complexity, or areas where assumptions and estimations are significant to the financial statements are disclosed in Note 3.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(b) Standards issued but not yet adopted

A number of new standards and amendments to standards are effective for annual periods beginning after 1 January 2020 and earlier application is permitted; however, the Group and the Bank have not early adopted them in preparing these financial statements.

The following amended standards are not expected to have a significant impact on the Group's and the Bank's financial statements.

- o Onerous Contracts Cost of Fulfilling a Contract (Amendments to CIAS 37).
- COVID-19-Related Rent Concessions (Amendment to CIFRS 16).
- o Property, Plant and Equipment: Proceeds before Intended Use (Amendments to CIAS 16).
- Reference to Conceptual Framework (Amendments to CIFRS 3).
- o Classification of Liabilities as Current or Non-current (Amendments to CIAS 1).

(c) Consolidation

(i) Subsidiaries

Subsidiaries are all entities over which the Group has control. The Group controls an entity when the Group is exposed to, or has rights to, variable returns from its involvement with the entity and has the ability to affect those returns through its power to direct relevant activities of the entity.

The consolidated financial statements include the financial statements of the Bank and all its subsidiaries made up to the end of the financial year.

Subsidiaries are consolidated from the date on which control is transferred to the Group and deconsolidated from the date that control ceases.

All material transactions and balances between group companies are eliminated and the consolidated financial statements reflect external transactions only. Where necessary, the accounting policies of subsidiaries have been changed to ensure consistency with the policies adopted by the Group.

(ii) Changes in ownership interests in subsidiaries without change of control

Transactions with non-controlling interests that do not result in loss in control are accounted for as equity transactions that is, as transactions with the owners in their capacity as owners. For purchases from non-controlling interest, the difference between any consideration paid and the relevant share of the carrying value of net assets of the subsidiary acquired is deducted from equity. For disposals to non-controlling interests, differences between any proceeds received and the relevant share of non-controlling interests are also recognised in equity.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(c) Consolidation (continued)

(iii) Disposal of subsidiaries

When the Group ceases to have control, any retained interest in the entity is re-measured to its fair value at the date when control is lost, with the change in carrying amount recognised in statement of profit or loss. The fair value is the initial carrying amount for the purposes of subsequently accounting for retained interest as an associate, joint venture or financial assets. In addition, any amount previously recognised in other comprehensive income in respect of that entity are accounted for as if the Group had directly disposed of the related assets or liabilities. This may mean that amounts previously recognised in other comprehensive income are reclassified to statement of profit or loss.

(iv) Investments in subsidiaries

In the Bank's separate financial statements, investments in subsidiaries are carried at cost less any accumulated impairment losses. On disposal of investments in subsidiaries, the difference between disposal proceeds and the carrying amounts of investments are recognised in the statement of profit or loss.

The amounts due from subsidiaries of which the Bank does not expect repayment in foreseeable future are considered as part of the Bank's investments in subsidiaries.

(d) Foreign currency translation

(i) Functional and presentation currency

Items included in the financial statements of each of the Group's entities are measured using the currency of the primary economic environment in which the entity operates ("the functional currency"). The financial statements are presented in United States Dollars ("US\$"), which is the Group's and the Bank's functional and presentation currency.

(ii) Transactions and balances

Transactions in currencies other than US\$ are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in currencies other than US\$ are recognised in the statement of profit or loss.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(d) Foreign currency translation (continued)

(iii) Group companies

The results and financial position of foreign operations (none of which has the currency of a hyper-inflationary economy) that have a functional currency different from the Bank's presentation currency are translated into the presentation currency as follows:

- a) assets and liabilities for each statement of financial position presented are translated at the closing rate at the end of reporting period,
- b) income and expenses for each statement of profit or loss are translated at average exchange rates (unless this average is not a reasonable approximation of the cumulative effect of the rates prevailing on the transaction dates, in which case income and expenses are translated at the rate on the dates of the transactions); and
- c) all resulting exchange differences are recognised as separate component of equity.

On consolidation, exchange differences arising from the translation of any net investment in foreign operations are recognised in other comprehensive income. When a foreign operation is partially disposed of or sold, exchange differences are reclassified to the statement of profit or loss as part of gain or loss on sale.

(e) Financial assets and financial liabilities

(i). Recognition and initial measurement

The Group/the Bank initially recognises loans and advances, deposits and placements with other banks, borrowings and subordinated liabilities on the date on which they are originated. All other financial instruments (including regular-way purchases and sales of financial assets) are recognised on the trade date, which is the date on which the Group or the Bank becomes a party to the contractual provisions of the instrument.

A financial asset or financial liability is measured initially at fair value plus, for an item not at fair value through profit and loss ("FVTPL"), transaction costs that are directly attributable to its acquisition or issue.

(ii). Classification

On initial recognition, a financial asset is classified as: amortised cost, fair value through other comprehensive income ("FVOCI") or FVTPL.

A financial asset is measured at amortised cost if it meets both of the following conditions and is not designated as at FVTPL:

 the asset is held within a business model whose objective is to hold assets to collect contractual cash flows; and

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

- (ii). Classification (continued)
 - the contractual terms of the financial asset give rise on specified dates to cash flows that are 'solely payment for principal and interest' ("SPPI").

A debt instrument is measured at FVOCI only if it meets both of the following conditions and is not designated as at FVTPL:

- the asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and
- the contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI.

On initial recognition of an equity investment that is not held for trading, the Group or the Bank may irrevocably elect to present subsequent changes in fair value in other comprehensive income ("OCI"). This election is made on an investment-by-investment basis.

All other financial assets are classified as measured at FVTPL

In addition, on initial recognition, the Group or the Bank may irrevocably designate a financial asset that otherwise meets the requirements to be measured at amortised cost or at FVOCI as at FVTPL if doing so eliminates or significantly reduces an accounting mismatch that would otherwise arise.

Business model assessment

The Group or the Bank makes an assessment of the objective of a business model in which an asset is held at a portfolio level because this best reflects the way the business is managed and information is provided to management. The information considered includes:

- the stated policies and objectives for the portfolio and the operation of those policies in practice. In
 particular, whether management's strategy focuses on earning contractual interest revenue, maintaining
 a particular interest rate profile, matching the duration of the financial assets to the duration of the liabilities
 that are funding those assets or realising cash flows through the sale of the assets;
- how the performance of the portfolio is evaluated and reported to the Group's or the Bank's management;
- the risks that affect the performance of the business model (and the financial assets held within that business model) and its strategy for how those risks are managed;
- how managers of the business are compensated (e.g. whether compensation is based on the fair value of the assets managed or the contractual cash flows collected); and

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(ii). Classification (continued)

Business model assessment (continued)

 the frequency, volume and timing of sales in prior periods, the reasons for such sales and its expectations about future sales activity. However, information about sales activity is not considered in isolation, but as part of an overall assessment of how the Group's or the Bank's stated objective for managing the financial assets is achieved and how cash flows are realised.

Financial assets that are held for trading or managed and whose performance is evaluated on a fair value basis are measured at FVTPL because they are neither held to collect contractual cash flows nor held both to collect contractual cash flows and to sell financial assets.

Assessment of whether contractual cash flows are solely payments of principal and interest

For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset on initial recognition. 'Interest' is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as profit margin.

In assessing whether the contractual cash flows are SPPI, the Group/the Bank considers the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition.

In making the assessment, the Group/the Bank considers:

- contingent events that would change the amount and timing of cash flows;
- leverage features;
- prepayment and extension terms;
- terms that limit the Group or the Bank's claim to cash flows from specified assets (e.g. non-recourse loans); and
- features that modify consideration of the time value of money (e.g. periodical reset of interest rates).

The Group or the Bank holds a portfolio of long-term fixed-rate loans for which the Group or the Bank has the option to propose to revise the interest rate at periodic reset dates. These reset rights are limited to the market rate at the time of revision in which the Group or the Bank has an option to either accept the revised rate or redeem the loan at par without penalty. The Group or the Bank has determined that the contractual cash flows of these loans are SPPI because the option varies the interest rate in a way that is consideration for the time value of money, credit risk, other basic lending risks and costs associated with the principal amount outstanding.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(ii). Classification (continued)

Non-recourse loans

In some cases, loans made by the Group or the Bank that are secured by collateral of the borrower limit the Group or the Bank's claim to cash flows of the underlying collateral (non-recourse loans). The Group or the Bank applies judgment in assessing whether the non-recourse loans meet the SPPI criterion. The Group or the Bank typically considers the following information when making this judgement:

- whether the contractual arrangement specifically defines the amounts and dates of the cash payments of the loan;
- the fair value of the collateral relative to the amount of the secured financial asset;
- the ability and willingness of the borrower to make contractual payments, notwithstanding a decline in the value of collateral;
- whether the borrower is an individual or a substantive operating entity or is a special-purpose entity;
- the Group or the Bank's risk of loss on the asset relative to a full-recourse loan;
- the extent to which the collateral represents all or a substantial portion of the borrower's assets; and
- whether the Group or the Bank will benefit from any upside from the underlying assets.

Reclassifications

Financial assets are not reclassified subsequent to their initial recognition, except in the period after the Group or the Bank changes its business model for managing financial assets.

Financial liabilities

The Group/the Bank classifies its financial liabilities, other than financial guarantees and loan commitments, as measured at amortised cost or FVTPL.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(iii). Derecognition

Financial assets

The Group or the Bank derecognises a financial asset when the contractual rights to the cash flows from the financial asset expire (see also (iv)), or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which the Group or the Bank neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset.

On derecognition of a financial asset, the difference between the carrying amount of the asset (or the carrying amount allocated to the portion of the asset derecognised) and the sum of (i) the consideration received (including any new asset obtained less any new liability assumed) and (ii) any cumulative gain or loss that had been recognised in OCI is recognised in profit or loss.

Any cumulative gain/loss recognised in OCI in respect of equity investment securities designated as at FVOCI is not recognised in profit or loss on derecognition of such securities, as explained in statement of profit or loss and other comprehensive income. Any interest in transferred financial assets that qualify for derecognition that is created or retained by the Group or the Bank is recognised as a separate asset or liability.

Financial liabilities

The Group or the Bank derecognises a financial liability when its contractual obligations are discharged or cancelled, or expire.

(iv). Modifications of financial assets and financial liabilities

Financial assets

If the terms of a financial asset are modified, then the Group or the Bank evaluates whether the cash flows of the modified asset are substantially different.

If the cash flows are substantially different, then the contractual rights to cash flows from the original financial asset are deemed to have expired. In this case, the original financial asset is derecognised (see (iii)) and a new financial asset is recognised at fair value plus any eligible transaction costs. Any fees received as part of the modification are accounted for as follows:

- fees that are considered in determining the fair value of the new asset and fees that represent reimbursement of eligible transaction costs are included in the initial measurement of the asset; and
- other fees are included in profit or loss as part of the gain or loss on derecognition.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(iv). Modifications of financial assets and financial liabilities (continued)

Financial assets (continued)

If cash flows are modified when the borrower is in financial difficulties, then the objective of the modification is usually to maximise recovery of the original contractual terms rather than to originate a new asset with substantially different terms. If the Group or the Bank plans to modify a financial asset in a way that would result in forgiveness of cash flows, then it first considers whether a portion of the asset should be written off before the modification takes place (see below for write-off policy). This approach impacts the result of the quantitative evaluation and means that the derecognition criteria are not usually met in such cases.

If the modification of a financial asset measured at amortised cost or FVOCI does not result in derecognition of the financial asset, then the Group or the Bank first recalculates the gross carrying amount of the financial asset using the original effective interest rate of the asset and recognises the resulting adjustment as a modification gain or loss in profit or loss. For floating-rate financial assets, the original effective interest rate used to calculate the modification gain or loss is adjusted to reflect current market terms at the time of the modification. Any costs or fees incurred and fees received as part of the modification adjust the gross carrying amount of the modified financial asset.

If such a modification is carried out because of financial difficulties of the borrower (see (vii)), then the gain or loss is presented together with impairment losses. In other cases, it is presented as interest income calculated using the effective interest rate method (see (Note 2(q))).

Financial liabilities

The Group or the Bank derecognises a financial liability when its terms are modified and the cash flows of the modified liability are substantially different. In this case, a new financial liability based on the modified terms is recognised at fair value. The difference between the carrying amount of the financial liability derecognised and consideration paid is recognised in profit or loss. Consideration paid includes non-financial assets transferred, if any, and the assumption of liabilities, including the new modified financial liability.

If the modification of a financial liability is not accounted for as derecognition, then the amortised cost of the liability is recalculated by discounting the modified cash flows at the original effective interest rate and the resulting gain or loss is recognised in profit or loss. For floating-rate financial liabilities, the original effective interest rate used to calculate the modification gain or loss is adjusted to reflect current market terms at the time of the modification. Any costs and fees incurred are recognised as an adjustment to the carrying amount of the liability and amortised over the remaining term of the modified financial liability by re-computing the effective interest rate on the instrument.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(v). Offsetting

Financial assets and financial liabilities are offset and the net amount presented in the statement of financial position when, and only when, the Group or the Bank currently has a legally enforceable right to set off the amounts and it intends either to settle them on a net basis or to realise the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted under CIFRS, or for gains and losses arising from a group of similar transactions such as in the Group or the Bank's trading activity.

(vi). Fair value measurement

'Fair value' is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal or, in its absence, the most advantageous market to which the Group or the Bank has access at that date. The fair value of a liability reflects its nonperformance risk.

The fair value of a financial liability with a demand feature (e.g. a demand deposit) is not less than the amount payable on demand, discounted from the first date on which the amount could be required to be paid.

The Group or the Bank recognises transfers between levels of the fair value hierarchy as of the end of the reporting period during which the change has occurred.

(vii). Impairment

The Group or the Bank recognises loss allowances for the expected credit loss ("ECL") on the following financial instruments that are not measured at FVTPL:

- financial assets that are debt instruments;
- lease receivables;
- financial guarantee contracts issued; and
- loan commitments issued.

No impairment loss is recognised on equity investments.

The Group or the Bank measures loss allowances at an amount equal to lifetime ECL, except for the following, for which they are measured as 12-month ECL:

- debt investment securities that are determined to have low credit risk at the reporting date; and
- other financial instruments (other than lease receivables) on which credit risk has not increased significantly since their initial recognition.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(vii). Impairment (continued)

Loss allowances for lease receivables are always measured at an amount equal to lifetime ECL.

The Group or the Bank considers a debt investment security to have low credit risk when its credit risk rating is equivalent to the globally understood definition of 'investment grade'. The Group or the Bank does not apply the low credit risk exemption to any other financial instruments.

12-month ECL are the portion of ECL that result from default events on a financial instrument that are possible within the 12 months after the reporting date. Financial instruments for which a 12-month ECL is recognised are referred to as 'Stage 1 financial instruments'.

Life-time ECL are the ECL that result from all possible default events over the expected life of the financial instrument. Financial instruments for which a lifetime ECL is recognised but which are not credit-impaired are referred to as 'Stage 2 financial instruments'.

Measurement of ECL

ECL are a probability-weighted estimate of credit losses. They are measured as follows:

- financial assets that are not credit-impaired at the reporting date: as the present value of all cash shortfalls
 (i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash
 flows that the Group or the Bank expects to receive);
- financial assets that are credit-impaired at the reporting date: as the difference between the gross carrying amount and the present value of estimated future cash flows;
- undrawn loan commitments: as the present value of the difference between the contractual cash flows that are due to the Group or the Bank if the commitment is drawn down and the cash flows that the Group or the Bank expects to receive; and
- financial guarantee contracts: the expected payments to reimburse the holder less any amounts that the Group or the Bank expects to recover.

The key inputs into the measurement of ECL are the term structure of the following variables:

- Probability of default ("PD");
- Loss given default ("LGD"); and
- Exposure at default ("EAD").

ECL for exposures in Stage 1 is calculated by multiplying the 12-month PD by LGD and EAD. Lifetime ECL is calculated by multiplying the lifetime PD by LGD and EAD.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(vii). Impairment (continued)

Measurement of ECL (continued)

Probability of Default ("PD") provides an estimate of the likelihood that a customer will be unable to meet its debt obligation or default over a particular time horizon. Financial assets under the general approach, which required staging will require both 12-month PD and lifetime PD estimation according to historical data using the migration approach or external credit rating approach.

LGD is the magnitude of the likely loss if there is a default. Loss Given Default ("LGD") is defined as the percentage of exposure the Bank might lose in case the customer defaults. These losses are usually shown as a percentage of Exposure at Default ("EAD"), and depend, amongst others, on the type and amount of collateral as well as the type of customer and the expected recovery from the customers.

With accurate collateral value, which is updated from time to time, the Bank can consider to take collateral into LGD calculation for ECL computation. In the event of over-collateralised, a floor LGD shall be applied for ECL calculation.

EAD is simply the amount outstanding at the point of default. However, EAD is different following the natures of products:

- Amortised facilities: the current amount allowed under the contract and arising from amortisation
- Revolving facilities: utilisation rate
- Off-balance sheet: credit conversion factors ("CCF")

As described above, and subject to using a maximum of a 12-month PD for Stage 1 financial assets, the Group or the Bank measures ECL considering the risk of default over the maximum contractual period (including any borrower's extension options) over which it is exposed to credit risk, even if, for credit risk management purposes, the Group or the Bank considers a longer period. The maximum contractual period extends to the date at which the Group or the Bank has the right to require repayment of an advance or terminate a loan commitment or guarantee.

However, for credit card facilities that include both a loan and an undrawn commitment component, the Group or the Bank measures ECL over a period longer than the maximum contractual period if the Group's or the Bank's contractual ability to demand repayment and cancel the undrawn commitment does not limit the Group or the Bank's exposure to credit losses to the contractual notice period. These facilities do not have a fixed term or repayment structure and are managed on a collective basis. The Group or the Bank can cancel them with immediate effect but this contractual right is not enforced in the normal day-to-day management, but only when the Group or the Bank becomes aware of an increase in credit risk at the facility level. This longer period is estimated taking into account the credit risk management actions that the Group or the Bank expects to take, and that serve to mitigate ECL. These include a reduction in limits, cancellation of the facility and/or turning the outstanding balance into a loan with fixed repayment terms.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(vii). Impairment (continued)

Restructured financial assets

If the terms of a financial asset are renegotiated or modified or an existing financial asset is replaced with a new one due to financial difficulties of the borrower, then an assessment is made of whether the financial asset should be derecognised (see (iv)) and ECL are measured as follows.

- If the expected restructuring will not result in derecognition of the existing asset, then the expected cash
 flows arising from the modified financial asset are included in calculating the cash shortfalls from the
 existing asset.
- If the expected restructuring will result in derecognition of the existing asset, then the expected fair value
 of the new asset is treated as the final cash flow from the existing financial asset at the time of its
 derecognition. This amount is included in calculating the cash shortfalls from the existing financial asset
 that are discounted from the expected date of derecognition to the reporting date using the original
 effective interest rate of the existing financial asset.

Credit-impaired financial assets

At each reporting date, the Group or the Bank assesses whether financial assets carried at amortised cost and debt financial assets carried at FVOCI, and finance lease receivables are credit-impaired (referred to as 'Stage 3 financial assets'). A financial asset is 'credit-impaired' when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred.

Evidence that a financial asset is credit-impaired includes the following observable data:

- significant financial difficulty of the borrower or issuer;
- a breach of contract such as a default or past due event;
- the restructuring of a loan or advance by the Group or the Bank on terms that the Group or the Bank would not consider otherwise;
- it is becoming probable that the borrower will enter bankruptcy or other financial reorganisation; or
- the disappearance of an active market for a security because of financial difficulties.

A loan that has been renegotiated due to a deterioration in the borrower's condition is usually considered to be credit-impaired unless there is evidence that the risk of not receiving contractual cash flows has reduced significantly and there are no other indicators of impairment. In addition, a retail loan that is overdue for 90 days or more is considered credit-impaired even when the regulatory definition of default is different.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(vii). Impairment (continued)

Presentation of allowance for ECL in the statement of financial position

Loss allowances for ECL are presented in the statement of financial position as follows:

- financial assets measured at amortised cost: as a deduction from the gross carrying amount of the assets;
- loan commitments and financial guarantee contracts: generally, as a provision;
- where a financial instrument includes both a drawn and an undrawn component, and the Group or the Bank cannot identify the ECL on the loan commitment component separately from those on the drawn component: the Group or the Bank presents a combined loss allowance for both components. The combined amount is presented as a deduction from the gross carrying amount of the drawn component. Any excess of the loss allowance over the gross amount of the drawn component is presented as a provision; and
- debt instruments measured at FVOCI: no loss allowance is recognised in the statement of financial
 position because the carrying amount of these assets is their fair value. However, the loss allowance is
 disclosed and is recognised in the fair value reserve.

Write-off

Loans and debt securities are written off (either partially or in full) when there is no reasonable expectation of recovering a financial asset in its entirety or a portion thereof. This is generally the case when the Group or the Bank determines that the borrower does not have assets or sources of income that could generate sufficient cash flows to repay the amounts subject to the write-off. This assessment is carried out at the individual asset level.

Recoveries of amounts previously written off are included in 'impairment losses on financial instruments' in the statement of profit or loss and OCI.

Financial assets that are written off could still be subject to enforcement activities in order to comply with the Group or the Bank's procedures for recovery of amounts due.

Non-integral financial guarantee contracts

The Group or the Bank assesses whether a financial guarantee contract held is an integral element of a financial asset that is accounted for as a component of that instrument or is a contract that is accounted for separately. The factors that the Group or the Bank considers when making this assessment include whether:

- the guarantee is implicitly part of the contractual terms of the debt instrument;
- the guarantee is required by laws and regulations that govern the contract of the debt instrument;
- the guarantee is entered into at the same time as and in contemplation of the debt instrument; and
- the guarantee is given by the parent of the borrower or another company within the borrower's group.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(e) Financial assets and financial liabilities (continued)

(vii). Impairment (continued)

Presentation of allowance for ECL in the statement of financial position (continued)

Non-integral financial guarantee contracts (continued)

If the Group or the Bank determines that the guarantee is an integral element of the financial asset, then any premium payable in connection with the initial recognition of the financial asset is treated as a transaction cost of acquiring it. The Group or the Bank considers the effect of the protection when measuring the fair value of the debt instrument and when measuring ECL.

If the Group or the Bank determines that the guarantee is not an integral element of the debt instrument, then it recognises an asset representing any prepayment of guarantee premium and a right to compensation for credit losses. A prepaid premium asset is recognised only if the guaranteed exposure neither is creditimpaired nor has undergone a significant increase in credit risk when the guarantee is acquired. These assets are recognised in 'other assets'. The Group or the Bank presents gains or losses on a compensation right in profit or loss in the line item 'impairment losses on financial instruments'.

(f) Cash and cash equivalents

Cash and cash equivalents consist of cash on hand, bank balances and deposit placements with original maturities of three months or less when purchased, and that are readily convertible to known amounts of cash and subject to an insignificant risk of changes in value.

Cash and cash equivalents are carried at amortised cost in the statement of financial position.

(g) Loans and advances

The 'Loans and advances' caption in the statement of financial position include loans and advances measured at amortised cost; they are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method.

(h) Financial investments

The 'financial securities' caption in the statement of financial position includes:

- debt investment securities measured at amortised cost; these are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method;
- debt securities measured at FVOCI; and
- equity investment securities designated as at FVOCI.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(h) Financial investments (continued)

For debt securities measured at FVOCI, gains and losses are recognised in OCI, except for the following, which are recognised in profit or loss in the same manner as for financial assets measured at amortised cost:

- interest revenue using the effective interest method;
- ECL and reversals; and
- foreign exchange gains and losses.

When debt security measured at FVOCI is derecognised, the cumulative gain or loss previously recognised in OCI is reclassified from equity to profit or loss.

The Group or the Bank elects to present in OCI changes in the fair value of certain investments in equity instruments that are not held for trading. The election is made on an instrument-by-instrument basis on initial recognition and is irrevocable.

Gains and losses on such equity instruments are never reclassified to profit or loss and no impairment is recognised in profit or loss. Dividends are recognised in profit or loss unless they clearly represent a recovery of part of the cost of the investment, in which case they are recognised in OCI. Cumulative gains and losses recognised in OCI are transferred to retained earnings on disposal of an investment.

(i) Share capital

Ordinary shares are classified as equity. Other shares are classified as equity and/or liability according to the economic substance of the particular instrument. Distributions to holders of a financial instrument classified as an equity instrument are charged directly to equity.

(j) Property and equipment

Property and equipment are stated at cost less accumulated depreciation and accumulated impairment losses. Cost includes expenditure that is directly attributable to the acquisition of the items.

Subsequent costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Group or the Bank and the Bank and the cost of the item can be measured reliably. The carrying amount of the replaced part is derecognised. All repairs and maintenance are charged to the statements of profit or loss during the financial period in which they are incurred.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(j) Property and equipment (continued)

Land is not depreciated. Other property and equipment are depreciated on a straight-line basis to write off the cost of the assets to their residual values over their estimated useful lives, summarised as follows:

Years
3 - 20
3 - 30
1-3
1 - 10
1 - 10
3-5

The assets' residual values and useful lives are reviewed, and adjusted if appropriate, at the end of each reporting period.

Depreciation on assets under construction commences when the assets are ready for their intended use.

Property and equipment are reviewed for indication of impairment at each statements of financial position date and whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. Where the carrying amount of an asset is greater than its estimated recoverable amount, it is written down to its recoverable amount.

Gains and losses on disposals are determined by comparing proceeds with the carrying amount and are included in other income.

(k) Intangible asset

Intangible assets include acquired computer software licenses and related costs. An intangible asset is recognised only when its cost can be measured reliably and it is probable that the expected future economic benefits that are attributable to it will flow to the Group and the Bank.

Intangible assets are stated at historical cost less accumulated amortisation and accumulated impairment losses, if any. Intangible assets are amortised using the straight-line method based on estimated useful lives over the life of the assets. Useful life of computer software are five years except for license of core banking system which has useful lives of ten years.

Costs associated with maintaining computer software are recognised as expenses when incurred.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(I) Impairment of non-financial assets

Assets that have an indefinite useful life are not subject to amortisation and are tested annually for impairment. Assets that are subject to amortisation are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognised for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and its value in use.

For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (cash-generating units). Non-financial assets other than goodwill that suffered impairment are reviewed for possible reversal of the impairment at each reporting date. Impairment losses are recognised in the statement of profit or loss.

(m) Reserves

Reserves comprise of general reserves, regulatory reserves and other reserves.

The general reserves are set up for any overall financial risk. The Board of Directors exercises its discretion for the use and maintenance of the general reserves. The transfer from retained earnings to general reserves is subject to the approval of Board of Directors of each entity within the Group.

Regulatory reserves are set up for the variance of provision between impairment in accordance with CIFRSs and regulatory provision. It is transferred between retained earnings and regulatory reserves.

Other reserves are for currency translation difference of the net investment in foreign operations.

(n) Current and deferred income tax

The tax expense for the year comprises current and deferred tax. Tax is recognised in statement of profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is recognised in other comprehensive income or directly in equity, respectively.

Current tax expense is determined according to the tax laws of each jurisdiction in which the Group operates and generates taxable income and includes all taxes based upon the taxable profits.

Deferred income tax is recognised in full, using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements. However, deferred income tax is not accounted for if it arises from initial recognition of an asset or liability in a transaction other than a business combination that at the time of the transaction affects neither accounting nor taxable profit or loss.

Deferred tax assets are recognised to the extent that it is probable that future taxable profits will be available against which the temporary differences and unused tax losses or unused tax credits can be utilised.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(o) Employee benefits

(i) Short-term employee benefits

The Group and the Bank recognise a liability and an expense for bonuses. The Group and the Bank recognise a provision where contractually obliged or where there is a past practice that has created a constructive obligation.

Wages, salaries, bonuses, and other short-term benefits are recognised as an expense in the year in which the associated services are rendered by employees of the Group and the Bank.

(ii) Post-employment benefits

The Group and the Bank have various post-employment benefit schemes. These benefit plans are below.

Seniority benefits

In accordance with Prakas No. 443 MoLVT dated 21 September 2018 and Notification Letter No. 042 MoLVT dated 22 March 2019 issued by the Ministry of Labour and Vocational Training ("MoLVT"), the Bank and its subsidiaries, except for ACLEDA Bank Lao Ltd. and ACLEDA MFI Myanmar Co., Ltd, are required seniority indemnity to its employees as follows:

- Current Seniority Indemnity: Employees who have worked from 1 month to 6 months (not including probation period) by June 30, or December 31, will receive seniority indemnity equal to 7.5 days.
- Back Pay Seniority Indemnity: Employees who have worked under permanent contract from 1 month to 6
 months in fiscal year will receive payment of seniority indemnity equal to 3 days, in case over 3 months will
 receive seniority indemnity equal to 15 days. The maximum seniority to be paid shall not exceed 6 days of
 the average base salary of each year that shall be compensated from 2008 to 2018 but shall not exceed
 156 days. The payment will be made from December 2021.

The liability was recognised at the present value of defined obligation at the reporting period using the projected unit credit method to better estimate the ultimate cost to the Group and the Bank of the benefit that employees have earned in return for their service in the periods from 2008 to 2018. The Group and the Bank attributes benefit to periods in which the obligation to provide back pay seniority indemnity. That obligation arises as employees render services in return for back pay seniority indemnity that the Group and the Bank expects to pay in future reporting periods.

The present value of the back pay seniority indemnity is determined by discounting the estimated future payments by reference to the Bank's sixty-months fixed deposit interest rate.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(o) Employee benefits (continued)

(ii) Post-employment benefits (continued)

Retirement benefits

The Bank and its subsidiaries, except ACLEDA MFI Myanmar Co., Ltd, provide an unfunded retirement benefit plan, which is a defined benefit plan for eligible employees, upon reaching the retirement age, as follows:

- When employees, who have worked for the Group or the Bank for 15 years or more, reach a retirement age of 58 years and 60 years for unskilled and skilled respectively, are entitled to the retirement benefits equivalent to 12 months of last salary; or
- When employees, who have worked for the Group or the Bank for 15 years or more, reach the early retirement age of 55 years and 57 years for unskilled and skilled respectively, are entitled to the retirement benefits equivalent to 6 months of last salary.

No separate fund is maintained and interest contributed for the retirement benefits.

The liability is recognised in the statement of financial position at the present value of defined obligation at the reporting period using the projected unit credit method to estimate the ultimate cost to the Group and the Bank of the benefit that employees have earned in return for their service in the current and prior periods. The Group and the Bank attributes benefit to periods in which the obligation to provide retirement benefit arises. That obligation arises as employees render services in return for retirement benefits that the Group and the Bank expect to pay in future reporting periods.

The present value of the retirement benefit obligations is determined by discounting the estimated future payments by reference to the Bank's six years fixed deposit interest rate, as there is no deep high-quality corporate bond market nor government bonds.

Actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions are recognised in other comprehensive income and directly in the retained earnings in the period in which they arise. The cost associated with providing these benefits is recognised in other comprehensive income so as to spread the cost over the period of employment in which the entitlement to the benefit is earned. Past-service costs are recognised immediately in the statement of profit or loss.

Career development benefits

The Bank provides career development benefits to employees as they reach management position as below.

Management position level	Benefits
Level 6	US\$1,250
Level 7	US\$2,500
Level 8	US\$3,375 to US\$3,750

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(o) Employee benefits (continued)

(ii) Post-employment benefits (continued)

Career development benefits (continued)

They are eligible to receive membership unless they have been working since their date of appointment in a management position for two years continuously and their performance evaluation has been high (i.e. evaluation score equal to or higher than 700 and no warning letter). They will automatically be entitled to membership on the first day of their third year.

The liability is recognised in the statement of financial position at the present value of benefits obligation at the end of each reporting period using the projected unit credit method. The present value is determined by discounting the estimated future payments by reference to three years fixed deposit interest rate, as the period of benefit entitlement is three years.

(p) Provisions

Provisions are recognised when the Group and the Bank have a present legal or constructive obligation as a result of past events; it is probable that an outflow of resources will be required to settle the obligation; and the amount of obligation can be reliably estimated.

Where there are a number of similar obligations, the likelihood that an outflow will be required in settlement is determined by considering the class of obligations as a whole. A provision is recognised even if the likelihood of an outflow with respect to any one item included in the same class of obligations may be small.

Provisions are measured at the present value of the expenditures expected to be required to settle the obligation using a pre-tax rate that reflects current market assessments of the time value of money and the risks specific to the obligation. The increase in the provisions due to the passage of time is recognised as interest expense.

(q) Interest

Effective interest rate

Interest income and expense are recognised in profit or loss using the effective interest method. The 'effective interest rate' is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to:

- the gross carrying amount of the financial asset; or
- the amortised cost of the financial liability.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(q) Interest (continued)

Effective interest rate (continued)

When calculating the effective interest rate for financial instruments other than purchased or originated creditimpaired assets, the Group/the Bank estimates future cash flows considering all contractual terms of the financial instrument, but not ECL. For purchased or originated credit-impaired financial assets, a creditadjusted effective interest rate is calculated using estimated future cash flows including ECL.

The calculation of the effective interest rate includes transaction costs and fees and points paid or received that are an integral part of the effective interest rate. Transaction costs include incremental costs that are directly attributable to the acquisition or issue of a financial asset or financial liability.

Amortised cost and gross carrying amount

The 'amortised cost' of a financial asset or financial liability is the amount at which the financial asset or financial liability is measured on initial recognition minus the principal repayments, plus or minus the cumulative amortisation using the effective interest method of any difference between that initial amount and the maturity amount and, for financial assets, adjusted for any expected credit loss.

The 'gross carrying amount of a financial asset' is the amortised cost of a financial asset before adjusting for any expected credit loss allowance.

Calculation of interest income and expense

The effective interest rate of a financial asset or financial liability is calculated on initial recognition of a financial asset or a financial liability. In calculating interest income and expense, the effective interest rate is applied to the gross carrying amount of the asset (when the asset is not credit- impaired) or to the amortised cost of the liability. The effective interest rate is revised as a result of periodic re-estimation of cash flows of floating rate instruments to reflect movements in market rates of interest. The effective interest rate is also revised for fair value hedge adjustments at the date amortisation of the hedge adjustment begins.

However, for financial assets that have become credit-impaired subsequent to initial recognition, interest income is calculated by applying the effective interest rate to the amortised cost of the financial asset. If the asset is no longer credit-impaired, then the calculation of interest income reverts to the gross basis.

For financial assets that were credit-impaired on initial recognition, interest income is calculated by applying the credit-adjusted effective interest rate to the amortised cost of the asset. The calculation of interest income does not revert to a gross basis, even if the credit risk of the asset improves.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(q) Interest (continued)

Presentation

Interest income calculated using the effective interest method presented in the statement of profit or loss and OCI includes:

- interest on financial assets and financial liabilities measured at amortised cost;
- interest on debt instruments measured at FVOCI;
- the effective portion of fair value changes in qualifying hedging derivatives designated in cash flow hedges of variability in interest cash flows, in the same period as the hedged cash flows affect interest income/expense; and
- the effective portion of fair value changes in qualifying hedging derivatives designated in fair value hedges of interest rate risk.

Interest expense presented in the statement of profit or loss and OCI includes:

- financial liabilities measured at amortised cost; and
- the effective portion of fair value changes in qualifying hedging derivatives designated in cash flow hedges of variability in interest cash flows, in the same period as the hedged cash flows affect interest income/expense.

Interest income and expense on other financial assets and financial liabilities at FVTPL are presented in net income from other financial instruments at FVTPL.

(r) Fee and commission

Fee and commission income and expense that are integral to the effective interest rate on a financial asset or financial liability are included in the effective interest rate.

Other fee and commission income – including account servicing fees, investment management fees, sales commission, placement fees and syndication fees – is recognised as the related services are performed. If a loan commitment is not expected to result in the draw-down of a loan, then the related loan commitment fee is recognised on a straight-line basis over the commitment period.

A contract with a customer that results in a recognised financial instrument in the Group's or the Bank's financial statements may be partially in the scope of CIFRS 9 and partially in the scope of CIFRS 15. If this is the case, then the Group or the Bank first applies CIFRS 9 to separate and measure the part of the contract that is in the scope of CIFRS 9 and then applies CIFRS 15 to the residual.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(s) Recognition of fee and other income

(i) Dividends

Dividends are recognised when the right to receive payment is established. Usually, this is the ex-dividend date for quoted equity securities.

The dividends on equity instruments designated as at FVOCI that clearly represent a recovery of part of the cost of the investment are presented in OCI.

(ii) Training and consultancy services

The Group and the Bank recognise service revenue when it is probable that economic benefits will flow to the Group or the Bank and the amount of revenue can be reliably measured. Revenue from training services and consultancy services are recognised when services are delivered.

(t) Leases

At inception of a contract, the Group and the Bank assess whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

This policy is applied to contracts entered into (or changed) on or after 1 January 2019.

As a lessee

At commencement or on modification of a contract that contains a lease component, the Group and the Bank allocate the consideration in the contract to each lease component on the basis of its relative standalone prices.

The Group and the Bank recognise a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset or the site on which it is located or restoring the underlying asset to the condition required by the terms and conditions of the lease, unless those costs are incurred to produce inventories, less any lease incentives received.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(t) Leases (continued)

As a lessee (continued)

The right-of-use asset is subsequently depreciated using the straight-line method from the commencement date to the end of the lease term, unless the lease transfers ownership of the underlying asset to the Group and the Bank by the end of the lease term or the cost of the right-of-use asset reflects that the Group and the Bank will exercise a purchase option. In that case the right-of-use asset will be depreciated over the useful life of the underlying asset, which is determined on the same basis as those of property and equipment. In addition, the right-of-use asset is periodically reduced by impairment losses, if any, and adjusted for certain remeasurements of the lease liability.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the Group's and the Bank's incremental borrowing rate. Generally, the Group and the Bank use its incremental borrowing rate as the discount rate.

Lease payments included in the measurement of the lease liability comprise of the following:

- o fixed payments, including in-substance fixed payments;
- variable lease payments that depend on an index or a rate, initially measured using the index or rate as at the commencement date;
- o amounts expected to be payable under a residual value guarantee; and
- the exercise price under a purchase option that the Group and the Bank are reasonably certain to exercise, lease payments in an optional renewal period if the Group and the Bank are reasonably certain to exercise an extension option, and penalties for early termination of a lease unless the Group and the Bank are reasonably certain not to terminate early.

The lease liability is measured at amortised cost using the effective interest method. It is remeasured when there is a change in future lease payments arising from a change in an index or rate, if there is a change in the Group's and the Bank's estimate of the amount expected to be payable under a residual value guarantee, if the Group and the Bank change its assessment of whether it will exercise a purchase, extension or termination option or if there is a revised in-substance fixed lease payment.

When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the right-of-use asset, or is recorded in profit or loss if the carrying amount of the right-of-use asset has been reduced to zero.

The Group and the Bank present right-of-use assets and lease liabilities separately in the statement of financial position.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

2. Summary of significant accounting policies (continued)

(t) Leases (continued)

As a lessee (continued)

Short-term leases and leases of low-value assets

The Group and the Bank have elected not to recognise right-of-use assets and lease liabilities for leases of low-value assets and short-term leases. The Group and the Bank recognise the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

(u) Contingent assets and contingent liabilities

Contingent assets arise from unplanned or other unexpected events that give rise to the possibility of an inflow of economic benefits to the Group and the Bank. As this may result in the recognition of income that may never be realised, contingent assets are not recognised in the Group's and the Bank's financial statements.

Contingent liabilities, which include certain guarantees and letters of credit pledged as collateral security, are possible obligations that arise from past events whose existence will be confirmed only by the occurrence, or non-occurrence, of one or more uncertain future events not wholly within the control of the Group and the Bank; or are present obligations that have arisen from past events but are not recognised because it is not probable that settlement will require the outflow of economic benefits, or because the amount of the obligations cannot be reliably measured.

Contingent liabilities are not recognised in the financial statements but are disclosed unless the probability of settlement is remote.

3. Critical accounting estimates and judgements in applying accounting policies

The Group and the Bank make estimates and assumptions concerning the future. The resulting accounting estimates will, by definition, rarely equal the related actual results. To enhance the information content of the estimates, certain key variables that are anticipated to have material impact to the Group's and the Bank's results and financial position are tested for sensitivity to changes in the underlying parameters. The estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amount of assets and liabilities within the next financial year are outlined below:

(a) Judgements

Information about judgements made in applying accounting policies that have the most significant effects on the amounts recognised in the financial statements is included in the following notes.

 Note 2(e)(ii): classification of financial assets: assessment of the business model within which the assets are held and assessment of whether the contractual terms of the financial asset are SPPI on the principal amount outstanding.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

3. Critical accounting estimates and judgements in applying accounting policies (continued)

(a) Judgements (continued)

 Note 35.1(f): establishing the criteria for determining whether credit risk on the financial asset has increased significantly since initial recognition, determining methodology for incorporating forward-looking information into measurement of ECL and selection and approval of models used to measure ECL.

(b) Assumptions and estimation uncertainties

- Note 35.1(f): impairment of financial instruments: determining inputs into the ECL measurement model, including incorporation of forward-looking information.
- Note 35.4: determination of the fair value of financial instruments with significant unobservable inputs.
- Note 22(a)(iv): measurement of defined benefit obligations: key actuarial assumptions.
- Note 32: recognition and measurement of contingencies: key assumptions about the likelihood and magnitude of an outflow of resources.
- Note 2(e)(vii): impairment of financial instruments: key assumptions used in estimating recoverable cash flows.

Coronavirus and impact on ECL

The ECL was estimated based on a range of forecast economic conditions as at reporting date. The Novel Coronavirus (Covid-19) outbreak has spread across mainland China, Cambodia and beyond, causing disruption to business and economic activity. The impact on GDP and other key indicators will be considered when determining the severity and likelihood of downside economic scenarios that are used to estimate ECL. Management estimates that the additional ECL of US\$7.4 million recorded as at 31 December 2020 resulting from the overlay has been determined based on possible forward-looking scenarios, considering the facts, circumstances and forecast of the future economic conditions and supportable information that is available as at the reporting date.

The calculation of the ECL in this current environment is subject to significant uncertainty. Management provides its best estimate on the possible outcomes of Covid-19 on the Group and the Bank, however, this estimate may move materially as events unfold. Consequently, this number should not be seen as firm guidance or a forecast as to the final financial impacts expected. In the event the impacts are more severe or prolonged than anticipated in the scenarios, this will have a corresponding impact on the ECL, the financial position and performance of the Group and the Bank.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

3. Critical accounting estimates and judgements in applying accounting policies (continued)

(b) Assumptions and estimation uncertainties (continued)

Retirement benefits

The present value of the retirement benefit obligation depends on a number of factors that are determined by management using a number of assumptions such as salary growth rates, turnover rates and mortality rates. The assumptions used in determining the net cost for retirement benefits include discount rate. Any changes in these assumptions will impact the value of retirement benefit obligation.

In the absence of a bond market and government bonds, the management used their six year fixed deposit interest rate as a discount rate to determine the present value of the estimated future cash outflows expected to be required to settle the retirement benefit obligation.

Taxes

Taxes are calculated on the basic of current interpretation of the tax regulations enacted as at reporting date. The management periodically evaluates position taken in tax returns with respect to situations in which applicable tax regulation is subjected to interpretation. It establishes provisions where appropriate on the basic of amounts expected to be paid to the tax authorities.

However, these regulations are subject to periodic variation and the ultimate determination of tax liabilities will be made following inspection by the tax authorities. Where the final tax outcome of these matters is different from the amounts initially recorded, such differences will impact the taxes liabilities and balances in the period in which the determination is made.

4. Translation of United States Dollars into Khmer Riel

The financial statements are expressed in United States Dollars ("US\$"). The translations of US\$ amounts into Khmer Riel ("KHR") are included solely for compliance with the Law on Accounting and Auditing.

Assets and liabilities are translated at the closing rate as at the reporting date. The statements of profit or loss and other comprehensive income and cash flows are translated into KHR using the average rate for the period. Exchange differences arising from the translation are recognised as "Currency Translation Difference" in the other comprehensive income.

The Group and the Bank have used the exchange rates:

			Closing rate	Average rate
31 December 2020	US\$1	=	KHR4,045	KHR4,077
31 December 2019	US\$1	=	KHR4,075	KHR4,052

These convenience translations should not be construed as representations that the United States Dollars amounts have been, could have been, or could in the future be, converted into Khmer Riels at this or any other rate of exchange.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

5. Cash on hand

		The Gr	oup		The Bank					
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
By currency:			· · · ·	· · ·			.			
In US\$	284,892,098	328,112,584	1,152,388,536	1,337,058,780	283,028,828	326,481,164	1,144,851,609	1,330,410,743		
In KHR	103,488,247	73,832,938	418,609,959	300,869,222	103,480,325	73,824,417	418,577,915	300,834,499		
In Thai Baht	12,247,160	9,820,413	49,539,762	40,018,183	9,927,044	7,846,913	40,154,893	31,976,170		
In Euro	2,967,502	1,697,804	12,003,546	6,918,551	2,965,106	1,640,057	11,993,854	6,683,232		
In other currencies	9,164,044	8,063,499	37,068,558	32,858,759	1,414,823	1,163,316	5,722,959	4,740,514		
	412,759,051	421,527,238	1,669,610,361	1,717,723,495	400,816,126	410,955,867	1,621,301,230	1,674,645,158		
		, ,	, ,	, ,	400,816,126	, , ,	, ,	1,6		

6. Deposits and placements with other banks

		The Gr	oup		The Bank					
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
Balances with local banks:										
The National Bank of Cambodia	264,197,563	448,591,990	1,068,679,142	1,828,012,359	264,197,563	448,591,990	1,068,679,142	1,828,012,359		
Other banks	10,803,730	1,579,492	43,701,088	6,436,430	3,318,751	452,223	13,424,348	1,842,809		
	275,001,293	450,171,482	1,112,380,230	1,834,448,789	267,516,314	449,044,213	1,082,103,490	1,829,855,168		
Balances with overseas banks:										
Bank of Laos	19,771,444	19,037,298	79,975,491	77,576,989	-	-	-	-		
Other banks	240,462,853	119,111,707	972,672,240	485,380,206	240,254,636	109,613,368	971,830,003	446,674,475		
	260,234,297	138,149,005	1,052,647,731	562,957,195	240,254,636	109,613,368	971,830,003	446,674,475		
	535,235,590	588,320,487	2,165,027,961	2,397,405,984	507,770,950	558,657,581	2,053,933,493	2,276,529,643		
Allowance for impairment losses	(582,444)	(589,956)	(2,355,985)	(2,404,070)	(141,543)	(45,241)	(572,542)	(184,357)		
	534,653,146	587,730,531	2,162,671,976	2,395,001,914	507,629,407	558,612,340	2,053,360,951	2,276,345,286		

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

6. Deposits and placements with other banks (continued)

		The Gr	oup			The B	ank	
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Current Non-current	534,653,146	587,730,531 -	2,162,671,976	2,395,001,914	507,629,407	558,612,340 -	2,053,360,951 -	2,276,345,286
	534,653,146	587,730,531	2,162,671,976	2,395,001,914	507,629,407	558,612,340	2,053,360,951	2,276,345,286

a) By account types

		The G	roup		The Bank						
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)			
Balances with local banks:				<u> </u>			<u> </u>				
Current accounts	270,348,210	449,044,213	1,093,558,509	1,829,855,168	264,481,054	449,044,213	1,069,825,863	1,829,855,168			
Fixed deposits	4,653,083	1,127,269	18,821,721	4,593,621	3,035,260	-	12,277,627				
	275,001,293	450,171,482	1,112,380,230	1,834,448,789	267,516,314	449,044,213	1,082,103,490	1,829,855,168			
Balances with overseas banks: Current accounts Savings accounts Fixed deposits	260,234,297 - -	137,313,244 835,761 -	1,052,647,731 - -	559,551,469 3,405,726 -	239,751,958 - 502,678	108,777,608 835,760 -	969,796,670 - 2,033,333	443,268,753 3,405,722 -			
·	260,234,297	138,149,005	1,052,647,731	562,957,195	240,254,636	109,613,368	971,830,003	446,674,475			
	535,235,590	588,320,487	2,165,027,961	2,397,405,984	507,770,950	558,657,581	2,053,933,493	2,276,529,643			
Allowance for impairment loss	(582,444)	(589,956)	(2,355,985)	(2,404,070)	(141,543)	(45,241)	(572,542)	(184,357)			
·	534,653,146	587,730,531	2,162,671,976	2,395,001,914	507,629,407	558,612,340	2,053,360,951	2,276,345,286			

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

6. Deposits and placements with other banks (continued)

b) By interest rate (per annum)

	The Gr	oup	The Ba	ank
	2020	2019	2020	2019
Current accounts	Nil	Nil	Nil	Nil
Savings accounts	0.20% - 0.50%	0.00% - 0.50%	Nil	0.00% - 0.50%
Fixed deposits	0.12% - 7.50%	1.00% - 8.25%	0.12% - 3.30%	1.00% - 8.25%

7. Financial investments

			The G	roup			The B	ank	
	Note	2020 US\$	2019 US\$	2020 KHR'000	2019 KHR'000	2020 US\$	2019 US\$	2020 KHR'000	2019 KHR'000
		·		(Note 4)	(Note 4)			(Note 4)	(Note 4)
Unlisted equity securities – at FVOCI:									
Credit Bureau Holding (Cambodia) Ltd	(a)	153,529	153,529	621,025	625,631	153,529	153,529	621,025	625,631
Total financial investments at FVOCI		153,529	153,529	621,025	625,631	153,529	153,529	621,025	625,631
Unquoted:									
Negotiable Certificate of Deposit with NBC	(b)	566,520,994	527,321,447	2,291,577,421	2,148,834,896	566,520,994	527,321,447	2,291,577,421	2,148,834,896
Total financial investments at amortised cost		566,520,994	527,321,447	2,291,577,421	2,148,834,896	566,520,994	527,321,447	2,291,577,421	2,148,834,896
		566,674,523	527,474,976	2,292,198,446	2,149,460,527	566,674,523	527,474,976	2,292,198,446	2,149,460,527

(a) This represents the Bank's equity investment in Credit Bureau Holding (Cambodia) Ltd. ("CBC"), directly at 5% and indirectly at 1% through the Association of Banks in Cambodia ("ABC").

(b) The Bank has pledged negotiable certificate of deposit ("NCD") amounting to US\$14,374,871 (31 December 2019: US\$36,899,080) with the National Bank of Cambodia ("NBC") as collateral for settlement clearing facility. The other NCD amounting to US\$552,146,123 (31 December 2019: US\$490,422,367) with NBC is for the purpose of earning interest. The terms of the NCD are for a period of less than or equal to three months. As at 31 December 2020, the Bank had yet to utilise the overdraft on settlement clearing facility.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

8. Loans and advances, net

						The	Group						
		2020			2019			2020			2019		
	Gross carrying amount	ECL allowance	Carrying amount	Gross amount	ECL allowance (*)	Carrying amount	Gross carrying amount	ECL allowance	Carrying amount	Gross carrying amount	ECL allowance (*)	Carrying amount	
	US\$	US\$	US\$	US\$	US\$	US\$	KHR'000	KHR'000	KHR'000	KHR'000	KHR'000	KHR'000	
							(Note 4)	(Note 4)	(Note 4)	(Note 4)	(Note 4)	(Note 4)	
Small Loan Staff Housing Loan Public Housing Loan Staff Loan Overdraft Loan Home Improvement Loan Personal & Others Loan Credit Card Loan	2,211,197,272 25,239,763 135,555,361 221,923,761 58,036,302 47,780,295 158,300,284 25,641,962	17,353,773 17,009 1,032,605 225,841 352,950 334,644 1,061,972 667,345	2,193,843,499 25,222,754 134,522,756 221,697,920 57,683,352 47,445,651 157,238,312 24,974,617	2,008,369,258 33,180,111 150,111,757 169,349,467 47,931,865 74,837,579 119,745,789 16,891,237	9,463,573 916,490 264,862 870,973 847,009 219,986 356,437 767,318	1,998,905,685 32,263,621 149,846,895 168,478,494 47,084,856 74,617,593 119,389,352 16,123,919	8,944,292,965 102,094,841 548,321,435 897,681,613 234,756,842 193,271,293 640,324,649 103,721,736	70,196,012 68,801 4,176,887 913,527 1,427,683 1,353,635 4,295,676 2,699,411	8,874,096,953 102,026,040 544,144,548 896,768,086 233,329,159 191,917,658 636,028,973 101,022,325	8,184,104,726 135,208,952 611,705,410 690,099,078 195,322,350 304,963,134 487,964,090 68,831,791	38,564,060 3,734,697 1,079,313 3,549,215 3,451,562 896,443 1,452,480 3,126,821	8,145,540,666 131,474,255 610,626,097 686,549,863 191,870,788 304,066,691 486,511,610 65,704,970	
Trade Loan	9,632,656	21,578	9,611,078	12,462,385	72,255	12,390,130	38,964,094	87,283	38,876,811	50,784,219	294,439	50,489,780	
Revolving Loan	33,296,272	23,512	33,272,760	38,731,317	3,825,256	34,906,061	134,683,420	95,106	134,588,314	157,830,117	15,587,918	142,242,199	
Medium Loan	1,580,039,237	14,251,318	1,565,787,919	1,207,852,809	15,838,896	1,192,013,913	6,391,258,714	57,646,581	6,333,612,133	4,922,000,197	64,543,501	4,857,456,696	
	4,506,643,165	35,342,547	4,471,300,618	3,879,463,574	33,443,055	3,846,020,519	18,229,371,602	142,960,602	18,086,411,000	15,808,814,064	136,280,449	15,672,533,615	

(*): In 2019, included allowance for impairment loss on off-balance sheet commitments amounting US\$207,479. See Note 35.1(f) for the detail movements of ECL allowance.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

8. Loans and advances, net (continued)

	The Bank												
		2020			2019			2020		2019			
	Gross carrying	ECL	Carrying		ECL	Carrying	Gross carrying	ECL	Carrying		ECL	Carrying	
	amount	allowance	amount		()	amount	amount	allowance	amount	Gross amount	allowance (*)	amount	
	US\$	US\$	US\$	US\$	US\$	US\$	KHR'000	KHR'000	KHR'000	KHR'000	KHR'000	KHR'000	
							(Note 4)	(Note 4)	(Note 4)	(Note 4)	(Note 4)	(Note 4)	
Small Loan	2,048,936,412	13,343,552	2,035,592,860	1,864,513,590	8,357,249	1,856,156,341	8,287,947,787	53,974,668	8,233,973,119	7,597,892,879	34,055,790	7,563,837,089	
Staff Housing Loan	25,108,879	16,907	25,091,972	32,995,773	916,314	32,079,459	101,565,416	68,389	101,497,027	134,457,775	3,733,980	130,723,795	
Public Housing Loan	135,084,056	1,016,789	134,067,267	149,985,838	264,595	149,721,243	546,415,007	4,112,912	542,302,095	611,192,290	1,078,225	610,114,065	
Staff Loan	214,389,121	209,906	214,179,215	163,227,924	848,346	162,379,578	867,203,994	849,070	866,354,924	665,153,790	3,457,010	661,696,780	
Overdraft Loan	57,948,236	351,432	57,596,804	47,931,865	847,009	47,084,856	234,400,615	1,421,542	232,979,073	195,322,350	3,451,562	191,870,788	
Home Improvement Loan	44,261,421	294,401	43,967,020	73,114,585	213,423	72,901,162	179,037,448	1,190,852	177,846,596	297,941,934	869,699	297,072,235	
Personal & Others Loan	157,228,541	1,083,793	156,144,748	118,408,444	481,072	117,927,372	635,989,448	4,383,941	631,605,507	482,514,409	1,960,366	480,554,043	
Credit Card Loan	25,641,962	667,345	24,974,617	16,891,237	767,318	16,123,919	103,721,736	2,699,411	101,022,325	68,831,791	3,126,821	65,704,970	
Trade Loan	9,632,656	21,578	9,611,078	12,462,385	72,255	12,390,130	38,964,094	87,283	38,876,811	50,784,219	294,439	50,489,780	
Revolving Loan	33,296,272	23,512	33,272,760	38,731,317	3,825,256	34,906,061	134,683,420	95,106	134,588,314	157,830,117	15,587,918	142,242,199	
Medium Loan	1,572,330,992	14,180,174	1,558,150,818	1,201,161,387	16,252,565	1,184,908,822	6,360,078,861	57,358,804	6,302,720,057	4,894,732,651	66,229,202	4,828,503,449	
	4,323,858,548	31,209,389	4,292,649,159	3,719,424,345	32,845,402	3,686,578,943	17,490,007,826	126,241,978	17,363,765,848	15,156,654,205	133,845,012	15,022,809,193	

(*) In 2019, included allowance for impairment loss on off-balance sheet commitments amounting US\$655,822. See Note 35.1(f) for the detail movements of ECL allowance.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

8. Loans and advances, net (continued)

(a) Loans and advances in gross amount by maturity

		The G	roup			The Ba	ank	
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Within one year	1,199,583,002	1,109,302,433	4,852,313,243	4,520,407,415	1,114,810,801	1,028,250,540	4,509,409,690	4,190,120,951
Later than one year but not later than three years	1,669,992,109	1,485,415,071	6,755,118,081	6,053,066,414	1,607,487,035	1,426,804,862	6,502,285,057	5,814,229,813
Later than three years but not later than five years	1,074,597,753	933,058,442	4,346,747,911	3,802,213,151	1,049,075,704	913,087,341	4,243,511,223	3,720,830,915
Later than five years	562,470,301	351,687,628	2,275,192,367	1,433,127,084	552,485,008	351,281,602	2,234,801,856	1,431,472,527
	4,506,643,165	3,879,463,574	18,229,371,602	15,808,814,064	4,323,858,548	3,719,424,345	17,490,007,826	15,156,654,206

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

8. Loans and advances, net (continued)

During the year, the Group and the Bank recognised the allowance for impairment losses as follows:

		The Gr	oup			The Bar	nk			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
Allowance for/(reversal of) impairments on:										
Loans and advances	20,852,357	22,600,280	85,015,059	91,576,335	16,204,462	21,462,297	66,065,592	86,965,228		
Deposit and placement with other banks	(7,786)	523,753	(31,744)	2,122,248	96,083	31,153	391,730	126,232		
Other receivables	(50,540)	287,172	(206,051)	1,163,620	(52,869)	287,182	(215,547)	1,163,661		
	20,794,031	23,411,205	84,777,264	94,862,203	16,247,676	21,780,632	66,241,775	88,255,121		
Off-balance sheet commitments	(54,156)	(87,989)	(220,794)	(356,531)	(132,082)	360,354	(538,498)	1,460,154		
	20,739,875	23,323,216	84,556,470	94,505,672	16,115,594	22,140,986	65,703,277	89,715,275		
Movements of impairment losses during the ye	ear were as follow	S:								
		The Gr	oup			The Bar	nk			
	2020	2019	2020	2019	2020	2019	2020	2019		
	US\$	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)	US\$	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)		
At the beginning of the year ECL on off-balance sheet commitment	33,443,055 (207,479)	34,188,330 -	136,280,449 (839,253)	138,462,737 -	32,845,402 (655,822)	32,845,673 -	133,845,012 (2,652,800)	131,865,791		
Allowance for impairment loss during the year	20,852,357	22,512,291	85,015,059	91,219,804	16,204,462	21,822,651	66,065,592	88,425,382		

Allowance for impairment loss during the year	20,852,357	22,512,291	85,015,059	91,219,804	16,204,462	21,822,651	66,065,592	88,425,382
Written off during the year	(18,676,459)	(23,994,329)	(76,143,923)	(97,225,021)	(17,158,054)	(22,436,319)	(69,953,386)	(90,911,965)
Currency translation difference	(68,927)	736,763	(281,015)	2,985,364	(26,599)	613,397	(108,444)	2,485,484
Exchange differences		-	(1,070,715)	837,565	-	-	(953,996)	1,980,320
At the end of the year	35,342,547	33,443,055	142,960,602	136,280,449	31,209,389	32,845,402	126,241,978	133,845,012

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

9. Other assets

		The Gro	up			The Bar	nk	
	2020	2019	2020	2019	2020	2019	2020	2019
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000
			(Note 4)	(Note 4)			(Note 4)	(Note 4)
Prepayments and advances	12,866,459	11,368,223	52,044,827	46,325,509	10,782,460	9,913,152	43,615,051	40,396,094
Stationery supplies	2,423,780	1,855,397	9,804,190	7,560,743	2,248,392	1,651,725	9,094,746	6,730,779
Receivable from Western Union	3,755,064	922,302	15,189,234	3,758,381	3,666,021	904,263	14,829,055	3,684,872
Others	3,721,610	3,383,911	15,053,912	13,789,437	3,559,237	3,198,400	14,397,113	13,033,481
	22,766,913	17,529,833	92,092,163	71,434,070	20,256,110	15,667,540	81,935,965	63,845,226
		The Grou	qu			The Banl	C	
	2020	2019	2020	2019	2020	2019	2020	2019

	US\$	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)	US\$	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)
Current	17,170,584	17,178,153	69,455,012	70,000,973	15,353,807	15,441,828	62,106,149	62,925,449
Non-current	5,596,329	351,680	22,637,151	1,433,097	4,902,303	225,712	19,829,816	919,777
	22,766,913	17,529,833	92,092,163	71,434,070	20,256,110	15,667,540	81,935,965	63,845,226

10. Statutory deposits

		The Group The Ba					ank		
		2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
With the Central Bank	(a)	357,000,975	583,195,741	1,444,068,944	2,376,522,645	356,753,756	583,195,741	1,443,068,943	2,376,522,645
With other central bank	(b)	3,376,033	3,894,959	13,656,053	15,871,958	-	-	-	-
Others	(C)	<u> </u>	245,399	-	1,000,000	-	-		-
		360,377,008	587,336,099	1,457,724,997	2,393,394,603	356,753,756	583,195,741	1,443,068,943	2,376,522,645

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

10. Statutory deposits (continued)

(a) With the Central Bank

(i) Reserve requirement

The reserve requirement represents the minimum reserve which is calculated at 8% for KHR and 12.50% for other currencies of the total amount of deposits from customers, non-residential banks and financial institution deposits, and non-residential borrowings. Pursuant to the National Bank of Cambodia's Prakas No. B7-018-282 on the maintenance of reserve requirement against commercial banks' deposits and borrowings, reserve requirements both in KHR and in other currencies bear no interest effect from 29 August 2018.

On 18 March 2020, NBC issued a press release announcing the reduction of the Reserve Requirement Rate ("RRR") on KHR from 8% to 7%. For foreign currencies, the RRR is reduced from 12.50% to 7%. in order to mitigate the impact of the COVID-19 pandemic on Cambodia's economy.

(ii) Capital guarantee

Pursuant to the National Bank of Cambodia's Prakas No. B7-01-136 on Bank's Capital Guarantee dated 15 October 2001; the banks are required to maintain 10% of its registered capital as a statutory deposit with the Central Bank. The deposit, which is not available for use in the Bank's day-to-day operations, is refundable should the Bank voluntarily cease its operations in Cambodia.

(b) With other central bank

These are the statutory deposits of ACLEDA Bank Lao Ltd maintained with the Bank of Lao ("BOL") in compliance with BOL's regulations. These statutory deposits comprise of reserve requirement calculated at 4% of customers' deposits in local currency and 8% of foreign currency deposits and capital guarantee of the share capital. These statutory deposits do not bear interest.

(c) Others

In compliance with Securities and Exchange Commission of Cambodia ("SECC")'s Prakas No. 009 on the licensing of securities firms and securities representatives, ACLEDA Securities Plc. is required to place a security deposit into SECC's bank account maintained with the National Bank of Cambodia amounting to KHR1,000,000,000 (equivalent to US\$247,709) for operating as a securities broker in the Kingdom of Cambodia.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

11. Investments in subsidiaries

			The Ba	ank	
		2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Unquoted ordinary shares, at cost					\$ *
ACLEDA Bank Lao Ltd.	(a)	49,389,566	49,389,566	199,780,794	201,262,481
ACLEDA Securities Plc.	(b)	2,010,000	2,010,000	8,130,450	8,190,750
ACLEDA Institute of Business	(C)	19,805,000	19,805,000	80,111,225	80,705,375
ACLEDA MFI Myanmar Co., Ltd.	(d)	19,911,005	19,911,005	80,540,016	81,137,346
ACLEDA Properties Ltd.	(e)		20,000		81,500
Total investments in subsidiaries - No	n-current	91,115,571	91,135,571	368,562,485	371,377,452

(a) ACLEDA Bank Lao Ltd.

ACLEDA Bank Lao Ltd. ("ABL") was established in Lao PDR on 13 December 2007 under a preliminary license from the Bank of Lao PDR ("BOL"). The Bank owned 99.90% of ACLEDA Lao's shares.

ABL obtained approval from the Bank of Lao PDR for the Capital Injection for the 1st of Year 2020 amounting to Kip40,000,000,000 (Forty billion Kip) (equivalent to US\$4,451,864), resulting in an increase in ABL's registered capital from Kip300,000,000 (Three Hundred billion Kip) (equivalent to US\$ 36,409,467) to be Kip340,000,000 (Three Hundred and Forty billion Kip) (equivalent to US\$40,861,331) through a conversion of the retained earnings with approval from the Bank of Lao PDR on 6 May 2020.

ACLEDA Bank Lao's principal business is providing banking and related financial services in Lao PDR.

(b) ACLEDA Securities Plc.

On 1 March 2010, ACLEDA Securities Plc. ("ACS") was established in the Kingdom of Cambodia and registered with the Ministry of Commerce ("MoC") under the Registration No. Co.0448KH/2010. On 20 October 2010, the Securities and Exchange Commission of Cambodia ("SECC") granted a brokerage license to ACLEDA Securities. The registered share capital of ACLEDA Securities is US\$2,010,000, divided into 2,010,000 shares with par value of US\$1 each. ACS is wholly owned by ACLEDA Bank Plc.

ACLEDA Securities' principal business is providing securities brokerage and other services approved by SECC.

(c) ACLEDA Institute of Business

ACLEDA Institute of Business ("AIB") (previously known as ACLEDA Training Center Ltd.) was established in the Kingdom of Cambodia under a primary license from MoC under the Registration No. Co.1332KH/2011 dated 8 June 2011. The registered share capital of AIB is US\$17,805,000, divided into 17,805,000 shares with par value of US\$1 each. AIB is wholly owned by ACLEDA Bank Plc. In 2018, AIB increased its share capital by US\$2,000,000 to US\$19,805,000. The revised Memorandum and Articles of Association was endorsed by the Ministry of Commerce ("MoC") on 14 December 2018.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

11. Investments in subsidiaries (continued)

(d) ACLEDA Institute of Business (continued)

AlB is recognised as the establishment of a private higher education institution under the sub-decree No. 13 ANKr. BK dated 25 January 2016 from the Royal Government of Cambodia ("RGC"). AlB provides training and education for Associate's degree, Bachelor's degree, and Master's degree of Business Administration, majoring in Banking and Finance. AlB can open branches, new colleges, new departments, new specialties, new levels or classes, new types of education and training, change to a new name and location by sending relevant documents to request for approval from the Ministry of Education, Youth and Sport ("MoEYS").

(e) ACLEDA MFI Myanmar Co., Ltd.

ACLEDA MFI Myanmar Co., Ltd. ("ACLEDA MFI") was incorporated in the Republic of Union of Myanmar under the Republic of the Union of Myanmar Companies Law on 6 September 2012 to provide services per the Registration No. 143715094. The financial year of the statutory financial statements of ACLEDA MFI is from 1 October to 30 September.

ACLEDA MFI is permitted to operate as a deposit-taking microfinance institution providing microfinance services to lower income segments of the Myanmar market and other activities allowed by the Microfinance Supervisory Authority at 45 townships in Yangon Region, 28 townships in Bago Region, 3 townships in Mon State and 25 townships in Magway Region.

ACLEDA Bank Plc. acquired 3,600,000 ordinary shares (45%) of ACLEDA MFI from KFW, COFIBRED S.A, and IFC for a consideration of US\$6,193,321 as approved by the Board of Directors of ACLEDA MFI on 25 April 2018. The approval on the share transfers, appointment of representative of shareholders, and changing the Board Members are obtained on 27 September 2018 by secretary of Microfinance Business Supervisory Committee, The Republic of the Union of Myanmar Government.

ACLEDA MFI started its operations on 18 February 2013. The Bank owns 99.99% of common stock MYR20,140,000,000 of ACLEDA MFI shares (2019: 99.99% of MYR8,000,000,000).

On 23 September 2019, ACLEDA Bank Plc. injected cash capital amounting to US\$3,969,923.20, equivalent MYR6,099,390,000 and on 3 December 2019, injected additional cash capital of US\$3,995,366.50 equivalent MYR6,039,396,000.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

11. Investments in subsidiaries (continued)

(f) ACLEDA Properties Ltd.

ACLEDA Properties Ltd. ("ACLEDA Properties") was established in the Kingdom of Cambodia with MoC under the Registration No. Co.0651KH/2015 dated 16 February 2015 with the registered capital of KHR20 million (equivalent to US\$5,000) by issuing 5,000 shares at KHR4,000 each. ACLEDA Properties is wholly owned by ACLEDA Bank Plc. In 2018, ACLEDA Properties increased its share capital by US\$15,000 to US\$20,000. The revised Memorandum and Articles of Association was endorsed by MoC on 4 May 2018.

ACLEDA Properties's principal business is purchasing, selling, renting of movable and immovable assets, purchasing, selling and supplying office supplies; other businesses permitted by laws aiming to improve the progress of the ACLEDA Properties, and all other activities reasonably incident to that objective in the judgment of the Board of Directors.

On 26 April 2019, the Board of Directors of ACLEDA Properties approved to liquidate the Company, and the Company obtained approval from National Bank of Cambodia and General Department of Taxation ("GDT") on 19 June 2019 and 2 December 2019, respectively. The Company filed for the liquidation and is awaiting the final approval from MoC.

On 19 June 2019, the Bank obtained approval from the NBC through Letter No: B7-019-717 Chhor.Tor, dated 19 June 2019 on ACLEDA Bank Plc. requests for processing procedure for voluntary dissolution of ACLEDA Properties Ltd.

On 11 July 2019, ACP requested to the General Department of Taxation ("GDT") for voluntary dissolution and liquidation of ACP. On 02 December 2019, ACP obtained Certificate No: 26680 GDT of Tax Situation for the complete closure of the company from the GDT.

On 10 February 2020, ACP noticed to the MOC on the intention to dissolve and liquidate the company. On 3 September 2020, ACP obtained approval from the MOC on "File Article of Dissolution".

(g) ACLEDA Bank Plc. (Representative Office)

On 7 April 2016, ACLEDA Bank Plc. received the foreign bank representative office registration certificate FB/R.O-1/(04)2016 from the central bank of Myanmar and received certificate of incorporation as representative office from the Ministry of Planning and Finance in the Republic of the Union of Myanmar on 6 May 2016 with permit N^o 58FC/2016-2017 (YGN), the validity of certificate is until 5 May 2021. The representation office is permit on the following activities:

- a. Marketing, promotion, negotiation and documentation for business purposes for customers of ACLEDA Bank Plc;
- b. Referring customer of ACLEDA Bank Plc. to banks operating in Myanmar; and monitoring and supervising offshore loans granted by ACLEDA Bank Plc.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

12. Property and equipment

					The Group				
		Land	Building and	Leasehold	Office	Computer	Motor	Capital in	
2020	Land	improvement	improvement	improvement	equipment	equipment	vehicles	progress	Total
	US\$	US\$	US\$	US\$	US\$	US\$	US\$	US\$	US\$
Cost									
As at 1 January	14,542,280	1,747,179	98,787,485	4,963,887	61,119,729	70,923,892	18,205,263	1,658,194	271,947,909
Additions	-	4,755	18,875	331,388	4,785,198	6,621,164	1,921,732	4,021,377	17,704,489
Disposals/written off	-	-	-	(178,518)	(999,004)	(1,157,711)	(1,032,407)	-	(3,367,640)
Reclassifications	-	-	-	100,327	121,063	20,790	54,000	(296,180)	-
Currency translation difference	-	-	-	(12,631)	(50,480)	(290,420)	(47,339)	-	(400,870)
Adjustments	-	-	-	800	(800)	-	-	(18,534)	(18,534)
As at 31 December	14,542,280	1,751,934	98,806,360	5,205,253	64,975,706	76,117,715	19,101,249	5,364,857	285,865,354
Less: Accumulated depreciation									
As at 1 January	-	427,535	17,527,768	4,267,941	45,436,998	57,210,873	15,917,002	-	140,788,117
Charge for the year	-	224,770	4,609,099	360,291	6,986,939	7,787,738	1,280,381	-	21,249,218
Disposals	-	-	-	(171,136)	(975,097)	(1,137,236)	(1,027,207)	-	(3,310,676)
Currency translation difference	-	(115)	(11,694)	(14,589)	(88,375)	(235,903)	(57,070)	-	(407,746)
Adjustments	-	-	-	800	(800)	-	-	-	-
As at 31 December		652,190	22,125,173	4,443,307	51,359,665	63,625,472	16,113,106	-	158,318,913
Carrying value	14,542,280	1,099,744	76,681,187	761,946	13,616,041	12,492,243	2,988,143	5,364,857	127,546,441
	14,042,200	1,033,744	70,001,107	701,940	13,010,041	12,432,243	2,300,143	0,004,007	127,040,441
In KHR' 000 equivalent (Note 4)	58,823,523	4,448,464	310,175,401	3,082,072	55,076,886	50,531,123	12,087,038	21,700,847	515,925,354

As at 31 December 2020, the fully depreciated property and equipment with historical costs amounting to US\$107,342,671 (2019: US\$91,082,789) are still in active use.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

12. Property and equipment (continued)

					The Group				
2019	Land US\$	Land improvement US\$	Building and improvement US\$	Leasehold improvement US\$	Office equipment US\$	Computer equipment US\$	Motor vehicles US\$	Capital in progress US\$	Total US\$
Cost									
As at 1 January	14,542,280	1,685,934	98,763,743	4,768,777	57,239,460	64,615,575	18,254,256	776,023	260,646,048
Additions	-	66,000	23,742	242,783	5,032,595	7,359,632	669,261	1,436,484	14,830,497
Disposals/written off	-	-	-	(219,500)	(1,137,585)	(1,087,781)	(680,729)	-	(3,125,595)
Reclassifications	-	-	-	205,033	39,119	265,532	9,697	(519,381)	-
Currency translation difference	-	-	-	(25,334)	(53,860)	(229,066)	(47,222)	-	(355,482)
Adjustments		(4,755)	-	(7,872)	-	-	-	(34,932)	(47,559)
As at 31 December	14,542,280	1,747,179	98,787,485	4,963,887	61,119,729	70,923,892	18,205,263	1,658,194	271,947,909
Less: Accumulated depreciation									
As at 1 January	-	206,737	12,899,157	4,141,969	39,623,449	50,414,594	15,498,045	-	122,783,951
Charge for the year	-	220,858	4,634,160	359,384	7,000,991	8,062,194	1,148,883	-	21,426,470
Disposals/written off	-	-	-	(208,623)	(1,123,100)	(1,081,929)	(673,012)	-	(3,086,664)
Currency translation difference	-	(60)	(5,549)	(24,782)	(64,342)	(183,986)	(56,914)	-	(335,633)
Adjustments		-	-	(7)	-	-	-	-	(7)
As at 31 December		427,535	17,527,768	4,267,941	45,436,998	57,210,873	15,917,002	-	140,788,117
Carrying value	14,542,280	1,319,644	81,259,717	695,946	15,682,731	13,713,019	2,288,261	1,658,194	131,159,792
In KHR' 000 equivalent (Note 4)	59,259,791	5,377,549	331,133,347	2,835,980	63,907,129	55,880,552	9,324,664	6,757,141	534,476,153

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

12. Property and equipment (continued)

					The Bank				
2020	Land US\$	Land improvement US\$	Building and improvement US\$	Leasehold improvement US\$	Office equipment US\$	Computer equipment US\$	Motor vehicles US\$	Capital in progress US\$	Total US\$
Cost									
As at 1 January	2,328,344	282,726	76,874,326	4,075,689	58,357,695	63,010,144	16,796,997	1,597,366	223,323,287
Additions	-	-	18,875	306,764	4,675,924	6,290,587	1,891,851	3,909,790	17,093,791
Disposals/written off	-	-	-	(165,474)	(929,740)	(1,068,364)	(941,978)	-	(3,105,556)
Reclassifications	-	-	-	100,327	70,167	20,790	54,000	(245,284)	-
Currency translation difference	-	-	-	-	-	-	-	-	-
Adjustments	-	-	-	800	(800)	-	-	(18,534)	(18,534)
As at 31 December	2,328,344	282,726	76,893,201	4,318,106	62,173,246	68,253,157	17,800,870	5,243,338	237,292,988
Less: Accumulated depreciation									
As at 1 January	-	108,392	16,672,292	3,565,265	43,454,637	52,041,450	14,569,907	-	130,411,943
Charge for the year	-	39,175	3,874,782	347,009	6,678,042	6,995,015	1,247,128	-	19,181,151
Disposals	-	-	-	(159,341)	(924,023)	(1,055,872)	(940,242)	-	(3,079,478)
Currency translation difference	-	(115)	(11,694)	(1,026)	(19,473)	(21,042)	(3,700)	-	(57,050)
Adjustments	-	-	-	800	(800)	-	-	-	-
As at 31 December		147,452	20,535,380	3,752,707	49,188,383	57,959,551	14,873,093	-	146,456,566
Carrying value	2,328,344	135,274	56,357,821	565,399	12,984,863	10,293,606	2,927,777	5,243,338	90,836,422
In KHR' 000 equivalent (Note 4)	9,418,151	547,183	227,967,386	2,287,040	52,523,771	41,637,636	11,842,858	21,209,302	367,433,327

As at 31 December 2020, the fully depreciated property and equipment with historical costs amounting to US\$99,652,456 (2019: US\$85,190,502) are still in active use.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

12. Property and equipment (continued)

					The Bank				
2019	Land US\$	Land improvement US\$	Building and improvement US\$	Leasehold improvement US\$	Office equipment US\$	Computer equipment US\$	Motor vehicles US\$	Capital in progress US\$	Total US\$
Cost									
As at 1 January	2,328,344	282,726	76,858,608	3,825,002	54,612,838	57,668,077	16,783,184	570,488	212,929,267
Additions	-	,	15,718	188,157	4,750,129	5,991,671	645,569	1,581,191	13,172,435
Disposals/written off	-	-	-	(134,631)	(1,044,391)	(915,136)	(641,453)	-	(2,735,611)
Reclassifications	-	-	-	205,033	39,119	265,532	9,697	(519,381)	-
Adjustments	-	-	-	(7,872)	-	-	-	(34,932)	(42,804)
As at 31 December	2,328,344	282,726	76,874,326	4,075,689	58,357,695	63,010,144	16,796,997	1,597,366	223,323,287
Less: Accumulated depreciation									
As at 1 January	-	66,393	12,775,218	3,388,187	37,782,563	45,767,306	14,109,478	-	113,889,145
Charge for the year	-	42,059	3,902,623	308,834	6,721,394	7,197,424	1,103,453	-	19,275,787
Disposals	-	-	-	(131,306)	(1,039,411)	(913,051)	(641,453)	-	(2,725,221)
Currency translation difference	-	(60)	(5,549)	(443)	(9,909)	(10,229)	(1,571)	-	(27,761)
Adjustments	-	-	-	(7)	-	-	-	-	(7)
As at 31 December		108,392	16,672,292	3,565,265	43,454,637	52,041,450	14,569,907	-	130,411,943
Carrying value	2,328,344	174,334	60,202,034	510,424	14,903,058	10,968,694	2,227,090	1,597,366	92,911,344
In KHR' 000 equivalent (Note 4)	9,488,002	710,411	245,323,289	2,079,979	60,729,961	44,697,428	9,075,392	6,509,266	378,613,728

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

13. Intangible assets

		The Group			The Bank	
2020	Computer software US\$	Work in progress US\$	Total US\$	Computer software US\$	Work in progress US\$	Total US\$
Cost						
As at 1 January	31,080,505	1,659,641	32,740,146	27,573,361	1,572,896	29,146,257
Additions	8,948,687	740,544	9,689,231	8,885,500	717,797	9,603,297
Disposals	(880,227)	-	(880,227)	(880,227)	-	(880,227)
Reclassifications	276,996	(276,996)	-	259,286	(259,286)	-
Currency translation difference	(156,883)	-	(156,883)		-	-
Adjustments	-	(290,284)	(290,284)	-	(290,284)	(290,284)
As at 31 December	39,269,078	1,832,905	41,101,983	35,837,920	1,741,123	37,579,043
Less: Accumulated amortisation						
As at 1 January	23,741,153	-	23,741,153	21,230,895	-	21,230,895
Charge for the year	3,667,583	-	3,667,583	3,339,510	-	3,339,510
Disposals	(865,291)	-	(865,291)	(865,291)	-	(865,291)
Currency translation difference	(132,137)	-	(132,137)		-	(10,629)
Adjustments	-	-	-	-	-	-
As at 31 December	26,411,308	-	26,411,308	23,694,485		23,694,485
Carrying value	12,857,770	1,832,905	14,690,675	12,143,435	1,741,123	13,884,558
In KHR' 000 equivalent (Note 4)	52,009,680	7,414,101	59,423,780	49,120,195	7,042,843	56,163,037

As at 31 December 2020, the fully amortised intangible assets with historical costs amounting to US\$14,290,466 and US\$13,996,797 (2019: US\$13,596,110 and US\$12,348,410, respectively) are still in active use by the Group and the Bank, respectively.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

13. Intangible assets (continued)

		The Group			The Bank	
2019	Computer software US\$	Work in progress US\$	Total US\$	Computer software US\$	Work in progress US\$	Total US\$
Cost						
As at 1 January	32,596,750	1,518,857	34,115,607	29,200,608	1,438,832	30,639,440
Additions	558,382	1,468,869	2,027,251	303,948	1,446,708	1,750,656
Disposals	(2,854,263)	-	(2,854,263)	(2,852,689)	-	(2,852,689)
Reclassifications	921,494	(921,494)	-	921,494	(921,494)	-
Currency translation difference	(126,427)	-	(126,427)	-	-	-
Adjustments	(15,431)	(406,591)	(422,022)	-	(391,150)	(391,150)
As at 31 December	31,080,505	1,659,641	32,740,146	27,573,361	1,572,896	29,146,257
Less: Accumulated amortisation						
As at 1 January	22,917,720	-	22,917,720	20,652,904	-	20,652,904
Charge for the year	3,537,457	-	3,537,457	3,182,821	-	3,182,821
Disposals	(2,600,357)	-	(2,600,357)	(2,600,357)	-	(2,600,357)
Currency translation difference	(96,662)	-	(96,662)	(4,473)	-	(4,473)
Adjustments	(17,005)	-	(17,005)	-	-	-
As at 31 December	23,741,153	-	23,741,153	21,230,895	-	21,230,895
Carrying value	7,339,352	1,659,641	8,998,993	6,342,466	1,572,896	7,915,362
In KHR' 000 equivalent (Note 4)	29,907,859	6,763,037	36,670,896	25,845,549	6,409,551	32,255,100

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

14. Right-of-use assets

	The Group							
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Right-of-use assets	29,529,768	32,569,457	119,447,912	132,720,537	26,182,172	28,847,850	105,906,886	117,554,989

The Group and the Bank lease office building and cars for its operations. Information about leases for which the Group or the Bank is a lessee is presented below:

		The G	oup		The Bank					
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
At the beginning of the year Additions during the year Depreciation for the year Lease termination during the year Exchange differences Currency translation difference	32,569,457 7,966,867 (10,627,120) (426,655) 47,219	30,621,838 13,068,149 (10,469,819) (678,486) 27,775	132,720,537 32,480,917 (43,326,768) (1,739,472) 192,512 (879,814)	123,038,545 52,952,140 (42,423,707) (2,749,225) 112,544 1,790,240	28,847,850 7,404,513 (9,770,638) (311,776) 12,223	26,889,967 12,239,172 (9,647,871) (665,335) 31,917	117,554,989 30,188,200 (39,834,891) (1,271,111) 49,833 (780,134)	108,043,887 49,593,125 (39,093,173) (2,695,937) 129,328 1,577,759		
At the end of the year	29,529,768	32,569,457	119,447,912	132,720,537	26,182,172	28,847,850	105,906,886	117,554,989		

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

15. Deferred tax assets, net

	The Group				The Bank			
	2020	2020 2019 2020		2019	2019 2020		2020	2019
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000
		<u></u> _	(Note 4)	(Note 4)			(Note 4)	(Note 4)
Deferred tax assets	32,324,548	28,701,473	130,752,797	116,958,502	31,015,663	27,538,165	125,458,357	112,218,023
Deferred tax liabilities	(21,128,703)	(13,887,119)	(85,465,604)	(56,590,008)	(18,329,716)	(13,530,422)	(74,143,701)	(55,136,470)
	11,195,845	14,814,354	45,287,193	60,368,494	12,685,947	14,007,743	51,314,656	57,081,553

The movements in net deferred tax assets during the year were as follows:

		The Gro	oup		The Bank			
	2020	2019	2020	2019	2020	2019	2020	2019
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000
			(Note 4)	(Note 4)			(Note 4)	(Note 4)
At the beginning of the year	14,814,354	11,616,105	60,368,494	46,673,510	14,007,743	10,933,258	57,081,553	43,929,831
Charged/(credited) to profit or loss	(3,645,153)	3,198,249	(14,861,291)	12,959,305	(1,321,796)	3,074,485	(5,388,963)	12,457,813
Exchange differences	26,644	-	(220,010)	735,679	-	-	(377,934)	693,909
At the end of the year	11,195,845	14,814,354	45,287,193	60,368,494	12,685,947	14,007,743	51,314,656	57,081,553

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set-off current tax assets against current tax liabilities and when the deferred taxes relate to the same fiscal authority.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

15. Deferred tax assets, net (continued)

The components and movements of deferred tax assets and liabilities during the year were as follows:

Deferred tax assets of the Group:

·	Unamortised Ioan fees US\$	Unearned revenue US\$	Provision for loan loss US\$	Other provision US\$	Staff bonus US\$	Unrealised exchange loss US\$	Accelerated depreciation US\$	Lease US\$	Others US\$	Total US\$
As at 31 December 2020										
As at 1 January 2020	6,641,624		7,866,254	6,754,038	426,528	656,882	1,188,937	190,389	4,976,821	28,701,473
Credited/(charged) to profit or loss	919,039	50,295	1,560,602	581,216	(165,094)	157,404	413,647	126,820	(20,931)	3,623,075
As at 31 December 2020	7,560,663	50,295	9,426,856	7,335,254	261,434	814,286	1,602,584	317,209	4,955,890	32,324,548
In KHR'000 equivalent (Note 4)	30,582,882	203,444	38,131,633	29,671,102	1,057,501	3,293,787	6,482,452	1,283,111	21,329,685	130,752,797
As at 31 December 2019										
As at 1 January 2019	5,806,687	56,087	7,222,846	6,853,483	433,084	594,279	1,213,116	-	324,780	22,504,362
Credited/(charged) to profit or loss	834,937	(56,087)	643,408	(99,445)	(6,556)	62,603	(24,179)	190,389	4,652,041	6,197,111
As at 31 December 2019	6,641,624	-	7,866,254	6,754,038	426,528	656,882	1,188,937	190,389	4,976,821	28,701,473
In KHR'000 equivalent (Note 4)	27,064,618		32,054,985	27,522,706	1,738,102	2,676,794	4,844,919	775,835	20,280,543	116,958,502

Deferred tax assets of the Bank:

	Unamortised Ioan fees US\$	Provision for loan loss US\$	Other provision US\$	Staff bonus US\$	Unrealised exchange loss US\$	Accelerated depreciation US\$	Lease US\$	Others US\$	Total US\$
As at 31 December 2020									
As at 1 January 2020	6,641,624	7,866,254	6,646,409	416,745	609,664	1,182,635	161,750	4,013,084	27,538,165
Credited/(charged) to profit or loss	919,039	1,560,602	573,834	(155,311)	204,622	418,107	108,419	(151,814)	3,477,498
As at 31 December 2020	7,560,663	9,426,856	7,220,243	261,434	814,286	1,600,742	270,169	3,861,270	31,015,663
In KHR'000 equivalent (Note 4)	30,582,882	38,131,633	29,205,883	1,057,501	3,293,787	6,475,001	1,092,834	15,618,836	125,458,357
As at 31 December 2019									
As at 1 January 2019	5,806,687	7,222,846	6,713,298	433,084	593,813	1,203,762	-	(913,974)	21,059,516
Credited/(charged) to profit or loss	834,937	643,408	(66,889)	(16,339)	15,851	(21,127)	161,750	4,927,058	6,478,649
As at 31 December 2019	6,641,624	7,866,254	6,646,409	416,745	609,664	1,182,635	161,750	4,013,084	27,538,165
In KHR000 equivalent (Note 4)	27,064,618	32,054,985	27,084,117	1,698,236	2,484,381	4,819,238	659,131	16,353,317	112,218,023

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

15. Deferred tax assets, net (continued)

Deferred tax liabilities of the Group:

	Accelerated depreciation US\$	Unrealised exchange US\$	Others US\$	Total US\$
As at 31 December 2020				
As at 1 January 2020	-	640,179	13,246,940	13,887,119
Credited to profit or loss	295,901	(640,179)	7,585,822	7,241,585
As at 31 December 2020	295,901		20,832,761	21,128,703
In KHR'000 equivalent (Note 4)	1,196,920		84,268,518	85,465,604
As at 31 December 2019				
As at 1 January 2019	239,665	-	10,648,592	10,888,257
Credited to profit or loss	(239,665)	640,179	2,598,348	2,998,862
As at 31 December 2019		640,179	13,246,940	13,887,119
In KHR'000 equivalent (Note 4)	<u> </u>	2,608,729	53,981,279	56,590,008

Deferred tax liabilities of the Bank:

	Accelerated depreciation US\$	Unrealised exchange US\$	Others US\$	Total US\$
As at 31 December 2020 As at 1 January 2020	-	639.392	12,891,030	13,530,422
Charged to profit or loss	-	(639,392)	5,438,686	4,799,294
As at 31 December 2020	-	-	18,329,716	18,329,716
In KHR'000 equivalent (Note 4)			74,143,701	74,143,701
As at 31 December 2019				
As at 1 January 2019	21,127	-	10,105,131	10,126,258
Credited to profit or loss	(21,127)	639,392	2,785,899	3,404,164
As at 31 December 2019	-	639,392	12,891,030	13,530,422
In KHR'000 equivalent (Note 4)		2,605,522	52,530,948	55,136,470

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

16. Deposits and placements of other banks and financial institutions

		The G	roup		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Current accounts	106,606,626	103,433,585	431,223,802	421,491,859	108,155,568	108,664,584	437,489,273	442,808,180	
Savings deposits	47,551,861	47,739,916	192,347,278	194,540,158	46,816,912	46,465,723	189,374,409	189,347,821	
Fixed deposits	162,850,972	134,001,644	658,732,182	546,056,699	141,792,074	119,147,414	573,548,939	485,525,712	
	317,009,459	285,175,145	1,282,303,262	1,162,088,716	296,764,554	274,277,721	1,200,412,621	1,117,681,713	

The deposits and placements of other banks and financial institutions are analysed as follows:

a) By maturity

		The G	roup		The Bank				
	2020	2019	2020	2019	2020	2019	2020	2019	
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000	
			(Note 4)	(Note 4)			(Note 4)	(Note 4)	
Within six months	195,717,857	192,616,757	791,678,732	784,913,285	183,717,176	187,268,370	743,135,977	763,118,608	
Later than six months but not later than one year	30,105,199	6,614,117	121,775,530	26,952,527	21,860,975	2,809,351	88,427,644	11,448,105	
Later than one year but not later than three years	5,648,815	6,194,271	22,849,457	25,241,654	5,648,815	4,450,000	22,849,457	18,133,750	
Later than three years	85,537,588	79,750,000	345,999,543	324,981,250	85,537,588	79,750,000	345,999,543	324,981,250	
	317,009,459	285,175,145	1,282,303,262	1,162,088,716	296,764,554	274,277,721	1,200,412,621	1,117,681,713	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

16. Deposits and placements of other banks and financial institutions (continued)

The deposits and placements of other banks and financial institutions are analysed as follows: (continued)

b) By relationship

	The Group				The Bank				
	2020	2020 2019 2020 2019		2020	2019	2020	2019		
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000	
			(Note 4)	(Note 4)			(Note 4)	(Note 4)	
Related parties	72,774	-	294,371	-	1,670,695	5,303,651	6,757,961	21,612,378	
Non-related parties	316,936,685	285,175,145	1,282,008,891	1,162,088,716	295,093,859	268,974,070	1,193,654,660	1,096,069,335	
	317,009,459	285,175,145	1,282,303,262	1,162,088,716	296,764,554	274,277,721	1,200,412,621	1,117,681,713	

c) By interest (per annum)

	The G	roup	The Bank		
	2020	2019	2020	2019	
Current accounts	Nil	Nil	Nil	Nil	
Savings deposits	0.00% - 1.90%	0.00% - 1.90%	0.00% - 0.50%	0.00% - 0.50%	
Fixed deposits	1.00% - 7.95%	0.75% - 7.95%	1.00% - 7.95%	0.75% - 7.95%	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

17. Deposits from customers

		The Group				The Bank				
	2020	2019	2020	2019	2020	2019	2020	2019		
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000		
			(Note 4)	(Note 4)			(Note 4)	(Note 4)		
Current accounts	525,179,976	489,596,024	2,124,353,003	1,995,103,798	515,353,012	479,925,715	2,084,602,934	1,955,697,289		
Savings deposits	1,866,624,777	1,766,834,632	7,550,497,223	7,199,851,125	1,824,684,515	1,732,155,639	7,380,848,863	7,058,534,229		
Margin deposits	13,134,176	16,434,050	53,127,742	66,968,754	13,134,176	16,407,246	53,127,741	66,859,527		
Fixed deposits	1,889,347,119	1,809,858,147	7,642,409,096	7,375,171,949	1,827,097,034	1,753,657,959	7,390,607,503	7,146,156,183		
	4,294,286,048	4,082,722,853	17,370,387,064	16,637,095,626	4,180,268,737	3,982,146,559	16,909,187,041	16,227,247,228		

The deposits from customers are analysed as follows:

a) By maturity

	The Group				The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Within six months	3,120,269,849	3,023,328,814	12,621,491,539	12,320,064,917	3,048,458,637	2,965,667,840	12,331,015,187	12,085,096,448	
Later than six months but not later than one year	618,538,572	642,364,991	2,501,988,524	2,617,637,338	601,304,341	627,119,253	2,432,276,059	2,555,510,956	
Later than one year but not later than three years	405,355,305	259,821,698	1,639,662,209	1,058,773,419	387,858,729	239,505,383	1,568,888,559	975,984,436	
Later than three years	150,122,322	157,207,350	607,244,792	640,619,952	142,647,030	149,854,083	577,007,236	610,655,388	
	4,294,286,048	4,082,722,853	17,370,387,064	16,637,095,626	4,180,268,737	3,982,146,559	16,909,187,041	16,227,247,228	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

17. Deposits from customers (continued)

The deposits from customers are analysed as follows: (continued)

b) By relationship

		The Group				The Bank				
	2020 US\$	2019 US\$	2020 KHR'000	2019 KHR'000	2020 US\$	2019 US\$	2020 KHR'000	2019 KHR'000		
			(Note 4)	(Note 4)			(Note 4)	(Note 4)		
Related parties	18,251,604	6,663,367	73,827,738	27,153,221	19,478,074	10,177,937	78,788,809	41,475,093		
Non-related parties	4,276,034,444	4,076,059,486	17,296,559,326	16,609,942,405	4,160,790,663	3,971,968,622	16,830,398,232	16,185,772,135		
	4,294,286,048	4,082,722,853	17,370,387,064	16,637,095,626	4,180,268,737	3,982,146,559	16,909,187,041	16,227,247,228		

c) By interest rate

The G	iroup	The Bank		
2020	2019	2020	2019	
Nil	Nil	Nil	Nil	
Nil	Nil	Nil	Nil	
0.00% - 15.00%	0.00% - 15.00%	0.00% - 0.50%	0.00% - 0.50%	
0.50% - 12.00%	0.05% - 13.25%	0.50% - 8.25%	0.05% - 8.25%	
	2020 Nil Nil 0.00% - 15.00%	Nil Nil Nil Nil 0.00% - 15.00% 0.00% - 15.00%	2020 2019 2020 Nil Nil Nil Nil Nil Nil 0.00% - 15.00% 0.00% - 15.00% 0.00% - 0.50%	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

18. Other liabilities

		The Group				The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
Accrued annual leave	20,063,310	18,076,954	81,156,089	73,663,588	19,626,620	17,648,290	79,389,678	71,916,782		
Accrued bonuses	11,046,280	9,718,649	44,682,203	39,603,495	10,454,999	9,500,000	42,290,471	38,712,500		
Fund transfers	16,060,460	16,373,343	64,964,561	66,721,373	16,026,656	15,744,953	64,827,824	64,160,683		
Tax payables	1,563,901	1,472,101	6,325,980	5,998,812	1,478,413	1,352,880	5,980,181	5,512,986		
Others	15,017,157	13,169,828	60,744,399	53,667,048	14,822,194	12,351,428	59,955,774	50,332,070		
	63,751,108	58,810,875	257,873,232	239,654,316	62,408,882	56,597,551	252,443,928	230,635,021		
		The Gro	oup							
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
Current	44,050,514	40,733,921	178,184,329	165,990,728	42,782,263	38,949,261	173,054,254	158,718,238		
Non-current	19,700,594	18,076,954	79,688,903	73,663,588	19,626,619	17,648,290	79,389,674	71,916,783		
	63,751,108	58,810,875	257,873,232	239,654,316	62,408,882	56,597,551	252,443,928	230,635,021		

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

19. Borrowings

The Group and the Bank have entered into borrowing agreements with various lenders. The repayments of principal and interest are made either on quarterly, semi-annual or annual basis based on the repayment schedule for each of the borrowing agreements. The Group and the Bank did not pledged any collaterals for borrowings.

		The Group				The Bank			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Unsecured:									
Current	124,629,071	183,682,266	504,124,592	748,505,234	104,886,698	166,692,481	424,266,693	679,271,860	
Non-current	417,769,845	381,289,435	1,689,879,023	1,553,754,448	402,466,218	351,375,647	1,627,975,852	1,431,855,762	
	542,398,916	564,971,701	2,194,003,615	2,302,259,682	507,352,916	518,068,128	2,052,242,545	2,111,127,622	

The borrowings are analysed as follows:

a) By relationship

		The Group				The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
Related parties Non-related parties	542,398,916	699,680 564,272,021	- 2,194,003,615	2,851,196 2,299,408,486	- 507,352,916	- 518,068,128	- 2,052,242,545	- 2,111,127,622		
	542,398,916	564,971,701	2,194,003,615	2,302,259,682	507,352,916	518,068,128	2,052,242,545	2,111,127,622		

b) By interest rate

Annual interest rates

The G	roup	The Bank				
2020	2019	2020	2019			
2.00% - 14.50%	2.50% - 13.00%	2.00% - 8.00%	2.60% - 7.69%			

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

20. Subordinated debts

These are subordinated debts from non-related parties. The subordinated debts are approved by the National Bank of Cambodia to be included as a Tier II line item in the calculation of the Bank's net worth in accordance with the Prakas No. B7-010-182 of the National Bank of Cambodia. The Group and the Bank did not pledge any collaterals for subordinated debts.

		The Group				The Bank			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Current	11,408,413	7,374,945	46,147,031	30,052,901	11,408,413	7,374,945	46,147,031	30,052,901	
Non-current	155,750,210	131,927,635	630,009,599	537,605,113	155,750,210	131,927,635	630,009,599	537,605,113	
	167,158,623	139,302,580	676,156,630	567,658,014	167,158,623	139,302,580	676,156,630	567,658,014	

The subordinated debts are analysed as follows:

a) By relationship

		The Group				The Bank			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Related parties	-	-	-	-	-	-	-	-	
Non-related parties	167,158,623	139,302,580	676,156,630	567,658,014	167,158,623	139,302,580	676,156,630	567,658,014	
	167,158,623	139,302,580	676,156,630	567,658,014	167,158,623	139,302,580	676,156,630	567,658,014	

b) By interest rate

	The G	roup	The Bank		
	2020 2019 2020		2019		
Annual interest rates	5.38% - 8.48%	7.00% - 8.48%	5.38% - 8.48%	7.00% - 8.48%	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

21. Lease liabilities

	The Group				The Bank			
	2020	2019	2020	2019	2020	2019	2020	2019
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000
			(Note 4)	(Note 4)			(Note 4)	(Note 4)
Undiscounted lease liabilities								
Less than one year	10,261,902	10,068,098	41,509,394	41,027,499	9,655,602	9,300,532	39,056,910	37,899,668
One to five years	20,581,294	23,121,979	83,251,334	94,222,064	18,888,896	21,444,212	76,405,584	87,385,164
More than five years	3,816,462	4,760,054	15,437,589	19,397,220	655,929	1,373,972	2,653,233	5,598,936
Total undiscounted lease liabilities	34,659,658	37,950,131	140,198,317	154,646,783	29,200,427	32,118,716	118,115,727	130,883,768
Present value of lease liabilities								
Current	10,309,865	9,755,994	41,703,404	39,755,676	9,711,879	9,023,433	39,284,551	36,770,489
Non-current	18,308,037	21,159,945	74,056,010	86,226,775	16,060,506	18,765,735	64,964,746	76,470,371
Total present value of lease liabilities	28,617,902	30,915,939	115,759,414	125,982,451	25,772,385	27,789,168	104,249,297	113,240,860

Amounts recognised in the statement of profit or loss and other comprehensive income:

	The Group				The Bank			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Interest on lease liabilities	2,109,253	2,091,046	8,599,425	8,472,918	1,875,776	1,858,700	7,647,538	7,531,453

Amounts recognised in the statement of cash flows:

-	The Group				The Bank				
	2020 2019	2020			2019	2020	2019		
	US\$	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)	US\$	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)	
Total cash outflow for leases payments	11,833,274	11,282,470	48,244,258	45,716,568	10,883,406	10,452,195	44,371,646	42,352,294	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

22. Employee benefits

			The Gr	oup			The Ba	ink	
	Note	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Provident fund Retirement benefits Career development benefits Seniority indemnity benefits	(a) (b) (c)	11,010,471 1,307,172 6,036,412 18,354,055	35,903 9,723,367 2,083,726 6,498,800 18,341,796	44,537,355 5,287,511 24,417,286 74,242,152	146,305 39,622,721 8,491,183 26,482,610 74,742,819	10,498,190 1,307,172 5,976,401 17,781,763	9,143,295 2,083,726 6,440,456 17,667,477	42,465,178 5,287,511 24,174,542 71,927,231	37,258,926 8,491,185 26,244,858 71,994,969
			The Gr	oup			The Ba	ink	
		2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Current Non-current		1,307,172 17,046,883	2,083,726 16,258,070	5,287,511 68,954,641	8,491,183 66,251,636	1,307,172 16,474,591	2,083,726 15,583,751	5,287,511 66,639,720	8,491,183 63,503,786
		18,354,055	18,341,796	74,242,152	74,742,819	17,781,763	17,667,477	71,927,231	71,994,969

(a) Retirement benefits

(i) The amounts recognised in the statement of financial position are determined as follows:

	The Group				The Bank			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Present value of defined benefit obligation Fair value of plan assets	11,010,471 -	9,723,367	44,537,355 -	39,622,721 -	10,498,190 -	9,143,295 -	42,465,178 -	37,258,926
Net liability recognised in statement of financial position	11,010,471	9,723,367	44,537,355	39,622,721	10,498,190	9,143,295	42,465,178	37,258,926

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

22. Employee benefits (continued)

(a) Retirement benefits (continued)

(ii) The movements in the defined benefit obligation over the year were as follows:

	The Group				The Bank			
	2020	2019	2020	2019	2020	2019	2020	2019
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000
			(Note 4)	(Note 4)			(Note 4)	(Note 4)
	9,723,367	8,415,302	39,622,721	33,812,684	9,143,295	7,756,116	37,258,926	31,164,074
At 1 January								
Current service cost	827,768	800,914	3,374,810	3,245,304	799,408	729,554	3,259,186	2,956,153
Interest cost	662,553	584,396	2,701,229	2,367,973	637,591	541,818	2,599,459	2,195,447
Benefits paid	(216,840)	(195,444)	(884,057)	(791,939)	(143,004)	(148,350)	(583,027)	(601,114)
Settlement loss	207,020	172,344	844,021	698,338	140,678	130,705	573,544	529,617
Remeasurement gain arising during the year	(169,447)	(34,908)	(690,835)	(141,447)	(72,593)	136,012	(295,962)	551,121
Currency translation difference	(23,950)	(19,237)	(97,644)	(77,948)	(7,185)	(2,560)	(29,293)	(10,373)
Exchange differences	-	-	(332,890)	509,756	-	-	(317,655)	474,001
At 31 December	11,010,471	9,723,367	44,537,355	39,622,721	10,498,190	9,143,295	42,465,178	37,258,926

(iii) The amounts recognised in the statement of profit or loss are as follows:

		The Group				The Bank			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Current service cost Interest cost	827,768 662,553	800,914 584,396	3,374,810 2,701,229	3,245,304 2,367,973	799,408 637,591	729,554 541,818	3,259,186 2,599,459	2,956,153 2,195,447	
Settlement loss	207,020	172,344	844,021	698,338	140,678	130,705	573,544	529,618	
	1,697,341	1,557,654	6,920,060	6,311,615	1,577,677	1,402,077	6,432,189	5,681,218	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

22. Employee benefits (continued)

(a) Retirement benefits (continued)

(iv) The principal assumptions used to determine estimated costs and obligations are as follows:

-	2020	2019
Salary growth rate	3.46%	3.44%
Inflation rate	1.20%	1.20%
Discount rates	7.00%	7.00%
Mortality rate (*) and staff turnover rate (**)		

(*) Mortality rate table is as follows:

	20	20	2019			
Age	Mortality rate	(% per annum)	Mortality rate (% per annum)			
	Females	Males	Females	Males		
18-29	0 - 0.49	0 - 0.42	0 - 0.22	0 - 0.42		
30-39	0 - 0.10	0 - 0.32	0 - 0.10	0 - 0.58		
40-49	-	-	-	-		
50-59	-	0 - 6.67	-	-		
60	-	-	-	-		

(**) Staff turnover rate table is as follows:

	2	2020	2019				
Age	Staff turnover r	ate (% per annum)	Staff turnover rate (% per annum)				
	Females	Males	Females	Males			
18-29	2.3 - 9.10	4.29 - 9.24	0 - 7.39	4.42 - 7.38			
30-39	1.68 - 4.68	2.74 - 5.76	2.31 - 5.26	2.82 - 5.40			
40-49	0 - 6.67	0 - 4.38	0 - 14.07	0 - 5.02			
50-59	-	0 - 8.33	-	0 - 6.06			
60	-	-	-	-			

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

22. Employee benefits (continued)

(a) Retirement benefits (continued)

The sensitivity of the defined benefit obligation to changes in the weighted principal assumptions is:

			Impact on defined benefit obligation						
	Change in ass	umption	Increase in assumption			Decrease in assumption			
	2020	2019		2020	2019	-	2020	2019	
Salary growth rate	1%	1%	Increase by	20.80%	20.79%	Decrease by	16.67%	16.59%	
Discount rate	1%	1%	Decrease by	16.61%	16.54%	Increase by	20.75%	20.74%	
Inflation rate	1%	1%	Increase by	20.84%	20.83%	Decrease by	16.69%	16.62%	
Mortality rate	0.10%	0.10%	Decrease by	1.91%	1.91%	Increase by	0.09%	0.06%	
Staff turnover rate	1%	1%	Decrease by	12.73%	12.79%	Increase by	7.39%	7.85%	

(b) Career development benefits

Movements in career development benefits were as follows:

		The Group				The Bank			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
At 1 January	2,083,726	2,165,423	8,491,183	8,700,670	2,083,726	2,165,423	8,491,185	8,700,670	
Additions (Note 28)	1,312,641	1,385,493	5,351,637	5,614,018	1,312,641	1,385,493	5,351,637	5,614,018	
Benefits paid	(2,085,315)	(1,465,393)	(8,501,829)	(5,937,772)	(2,085,315)	(1,465,393)	(8,501,829)	(5,937,772)	
Currency translation difference	(3,880)	(1,797)	(15,819)	(7,281)	(3,880)	(1,797)	(15,821)	(7,281)	
Exchange differences	-	-	(37,661)	121,548	-	-	(37,661)	121,550	
At 31 December	1,307,172	2,083,726	5,287,511	8,491,183	1,307,172	2,083,726	5,287,511	8,491,185	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

22. Employee benefits (continued)

(c) Seniority indemnity benefits

Movements in Seniority indemnity benefits were as follows:

	The Group				The Bank			
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
At 1 January	6,498,800	9,499,738	26,482,610	38,169,947	6,440,456	9,390,636	26,244,858	37,731,575
Additions (Note 28)	6,563,719	3,233,915	26,760,282	13,103,824	6,378,738	3,171,116	26,006,115	12,849,362
Benefits paid	(6,998,257)	(6,225,869)	(28,531,894)	(25,227,221)	(6,815,248)	(6,112,312)	(27,785,766)	(24,767,088)
Currency translation difference	(27,850)	(8,984)	(113,544)	(36,403)	(27,545)	(8,984)	(112,301)	(36,403)
Exchange differences	-	-	(180,168)	472,463		-	(178,364)	467,412
At 31 December	6,036,412	6,498,800	24,417,286	26,482,610	5,976,401	6,440,456	24,174,542	26,244,858

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

23. Share capital and share premium

As at 31 December 2020, the authorised share capital comprised 433,163,019 ordinary shares (2019: 428,818,154) at par value of US\$1 each. All issued shares are fully paid by the following shareholders and their respective interest in the Bank are:

Share capital

	Asa	31 December 2020		Asa	t 31 December 2019	
	Number of		% of	Number of		% o f
	shares	US\$	shareholding	shares	US\$	shareholding
ACLEDA Financial Trust	111,492,719	111,492,719	25.7392%	111,492,719	111,492,719	26.0000%
ASA Plc.	107,204,547	107,204,547	24.7492%	107,204,547	107,204,547	25.0000%
SMBC	78,259,310	78,259,310	18.0669%	78,259,310	78,259,310	18.2500%
COFIBRED S.A	52,530,223	52,530,223	12.1271%	52,530,223	52,530,223	12.2500%
ORIX Corporation	52,530,223	52,530,223	12.1271%	52,530,223	52,530,223	12.2500%
Triodos Microfinance Fund	10,938,339	10,938,339	2.5252%	10,938,339	10,938,339	2.5508%
Triodos Fair Share Fund	9,354,157	9,354,157	2.1595%	9,354,157	9,354,157	2.1814%
Triodos Sustainable Finance Foundation	6,508,636	6,508,636	1.5026%	6,508,636	6,508,636	1.5178%
Other investors in CSX	4,344,865	4,344,865	1.0031%	-	-	-
	433,163,019	433,163,019	100%	428,818,154	428,818,154	100%
In KHR'000 equivalent (Note 4)	_	1,752,144,412		_	1,747,433,978	

Share premium

The share premium mainly represents the excess amount received by the Bank over the par value of its shares pursuant to the issuance of shares, net of transaction costs directly distributable to the issuance.

On 25 May 2020, the Bank was successfully listed on the Cambodia Securities Exchange ("CSX"). The number of new issued shares are 4,344,865 shares with a par value of KHR4,000 (US\$0.98) per share, at an offering price of KHR16,200 (US\$3.97) per share. The Bank received the proceeds from the IPO amounting to US\$17,082,105 and incurred IPO costs of US\$1,031,025, resulting in share premium of US\$11,706,215 (KHR47,726,239 thousand).

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

24. Interest income calculated using the effective interest method

		The	Group		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Loans and advances:							<u>, </u>	· · · · · ·	
- Interest income	512,683,813	475,961,781	2,090,211,906	1,928,597,137	476,367,776	445,071,958	1,942,151,423	1,803,431,574	
Financial Investments	1,464,244	5,582,893	5,969,723	22,621,882	1,464,244	5,576,930	5,969,723	22,597,720	
Deposits and placements with other banks:									
- Banks outside Cambodia	527,686	1,894,524	2,151,376	7,676,611	534,098	1,912,027	2,177,519	7,747,533	
- Banks inside Cambodia	418,733	104,268	1,707,174	422,494	373,223	90,374	1,521,628	366,196	
	515,094,476	483,543,466	2,100,040,179	1,959,318,124	478,739,341	452,651,289	1,951,820,293	1,834,143,023	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

25. Interest expense

		The Gr	roup		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Deposits and placements of other banks and financial institutions:									
Fixed deposits	8,190,938	7,490,473	33,394,454	30,351,397	7,147,400	6,781,482	29,139,950	27,478,565	
Savings deposits	38,667	37,923	157,645	153,664	23,553	21,970	96,026	89,022	
Deposits from customers:									
Fixed deposits	87,880,604	82,093,075	358,289,223	332,641,140	83,847,163	78,679,634	341,844,884	318,809,877	
Savings deposits	6,003,502	5,862,572	24,476,278	23,755,142	4,700,755	4,809,851	19,164,978	19,489,516	
Current accounts	47,316	48,178	192,907	195,217	47,316	48,178	192,907	195,217	
Subordinated debts	12,058,447	7,526,693	49,162,288	30,498,160	12,058,447	7,526,693	49,162,288	30,498,160	
Borrowings	34,448,590	51,722,720	140,446,901	209,580,461	30,155,737	46,757,479	122,944,940	189,461,305	
Interest expenses on lease	2,109,253	2,091,046	8,599,425	8,472,918	1,875,776	1,858,700	7,647,538	7,531,453	
-	150,777,317	156,872,680	614,719,121	635,648,099	139,856,147	146,483,987	570,193,511	593,553,115	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

26. Fee and commission income

		The G	roup			The B	The Bank		
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Commission fees	16,297,957	17,728,899	66,446,771	71,837,499	15,848,285	17,489,501	64,613,458	70,867,458	
Commission fee collected for assurance agency	4,367,568	7,807,088	17,806,575	31,634,321	4,155,100	7,627,351	16,940,343	30,906,026	
ATM Fee	7,260,221	7,254,974	29,599,921	29,397,155	7,178,009	7,156,586	29,264,743	28,998,486	
Early loan redemption fees	6,762,569	6,482,079	27,570,994	26,265,384	5,382,843	5,449,183	21,945,851	22,080,090	
Deposit fee charged	1,462,641	1,552,286	5,963,187	6,289,863	1,341,315	1,512,200	5,468,541	6,127,434	
Fee income from guarantee	1,059,745	633,402	4,320,580	2,566,545	1,057,581	632,494	4,311,758	2,562,866	
Training fees	1,101,889	1,053,824	4,492,401	4,270,095	26,417	25,548	107,702	103,520	
Others	7,462,575	6,222,067	30,424,919	25,211,814	7,364,544	6,155,361	30,025,245	24,941,524	
	45,775,165	48,734,619	186,625,348	197,472,676	42,354,094	46,048,224	172,677,641	186,587,404	

There were settlement fees amounting to KHR6,073,600 (equivalent to US\$1,502) and US\$12,169 for operation of cash settlement agent.

27. Other incomes

		The Gr	oup		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Foreign exchange gain Recovery from loans and advances written off Gain on disposals of property and equipment Dividends on financial investments Others	9,834,586 6,403,750 369,528 174,479 1,569,015	9,383,469 6,938,680 76,481 - 1,451,093	40,095,607 26,108,089 1,506,566 711,351 6,396,874	38,021,816 28,115,531 309,901 - 5,879,830	9,820,545 5,460,909 326,299 174,479 880,516	9,339,015 6,427,702 84,637 - 382,410	40,038,362 22,264,126 1,330,321 711,351 3,589,864	37,841,689 26,045,049 342,949 - 1,549,525	
	18,351,358	17,849,723	74,818,487	72,327,078	16,662,748	16,233,764	67,934,024	65,779,212	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

28. General and administrative expenses

		The G	roup		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Salaries and wages	104,491,311	99,255,909	426,011,075	402,184,943	95,451,391	90,560,200	389,155,321	366,949,930	
Other employee benefits	35,479,412	32,314,297	144,649,563	130,937,531	34,870,101	31,616,916	142,165,402	128,111,744	
Seniority indemnity	6,563,719	3,233,915	26,760,282	13,103,824	6,378,738	3,171,116	26,006,115	12,849,362	
Retirement benefits	1,697,381	1,558,012	6,920,222	6,313,065	1,577,677	1,402,382	6,432,189	5,682,452	
Career development expense	1,312,641	1,385,493	5,351,637	5,614,018	1,312,641	1,385,493	5,351,637	5,614,018	
Depreciation of right-of-use assets	10,627,120	10,472,238	43,326,768	42,433,509	9,770,638	9,648,626	39,834,891	39,096,232	
Depreciation charges	21,249,218	21,426,470	86,633,062	86,820,056	19,181,151	19,275,787	78,201,553	78,105,489	
Repairs and maintenance	11,581,510	11,538,393	47,217,816	46,753,568	11,053,765	10,730,382	45,066,200	43,479,508	
Utilities	5,203,989	5,345,689	21,216,663	21,660,732	4,812,487	4,875,541	19,620,509	19,755,692	
Amortisation charges	3,667,583	3,537,457	14,952,736	14,333,776	3,339,510	3,182,821	13,615,182	12,896,791	
Communication	3,717,757	4,573,061	15,157,295	18,530,043	2,755,106	3,745,992	11,232,567	15,178,760	
Office supplies	5,280,235	5,206,046	21,527,518	21,094,898	4,677,362	4,533,968	19,069,605	18,371,638	
Travelling expenses	2,011,396	2,438,327	8,200,461	9,880,101	1,733,487	2,015,788	7,067,426	8,167,973	
License fees	1,175,271	1,132,371	4,791,580	4,588,367	1,135,316	1,108,699	4,628,683	4,492,448	
Others	11,867,677	11,994,716	48,384,521	48,602,589	10,054,387	10,160,199	40,991,737	41,169,126	
	225,926,220	215,412,394	921,101,199	872,851,020	208,103,757	197,413,910	848,439,017	799,921,163	

There were salaries and wages expenses of ACLEDA Bank's staff who is responsible for operation of cash settlement agent amounting to US\$35,701.

Above expenses include costs incurred for operation of cash settlement agent, consisting of the repairs and maintenance amounting to US\$8,101, office supplies amounting to US\$630, furniture and fixtures amounting to US\$512 and membership fees amounting to US\$12,773 (KHR51,666,667).

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

29. Taxation

(a) Current income tax liabilities

		The G	roup		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
At 1 January Income tax expense Income tax paid Currency translation difference Exchange difference	30,459,303 34,897,719 (35,064,652) - -	13,810,997 35,861,058 (19,216,756) 4,004	124,121,660 142,278,000 (142,958,586) - (908,437)	55,492,586 145,309,007 (77,866,295) 16,224 1,170,138	29,175,560 32,490,343 (33,715,569) - -	12,901,983 33,414,108 (17,140,531) - -	118,890,407 132,463,128 (137,458,375) - (836,059)	51,840,168 135,393,966 (69,453,432) - 1,109,705	
At 31 December	30,292,370	30,459,303	122,532,637	124,121,660	27,950,334	29,175,560	113,059,101	118,890,407	

(b) Income tax expense

		The Gr	oup		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Current income tax Deferred tax expense/(benefit)	34,897,719 <u>3,645,153</u> 38,542,872	35,861,058 (3,198,249) 32,662,809	142,278,000 14,861,291 157,139,291	145,309,007 (12,959,305) 132,349,702	32,490,343 <u>1,321,796</u> 33,812,139	33,414,108 (3,074,485) 30,339,623	132,463,128 5,388,963 137,852,091	135,393,966 (12,457,813) 122,936,153	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

29. Taxation (continued)

c) Reconciliation between income tax expense and accounting profit

		The Gr	oup		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Profit before income tax	180,035,462	153,522,621	734,004,580	622,073,660	172,154,315	148,226,402	701,873,143	600,613,382	
Tax calculated at domestic tax rates applicable to profits in the respective countries Effect of non-deductible expense	36,455,146 2,087,726	30,886,544 1,447,340	148,627,630 8,511,661	125,152,276 5,864,622	34,430,863 (618,724)	29,645,280 694,343	140,374,628 (2,522,537)	120,122,675 2,813,478	
Utilisation of tax losses	- 38,542,872	328,925 32,662,809	- 157,139,291	1,332,804 132,349,702	- 33,812,139	- 30,339,623	- 137,852,091	- 122,936,153	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

29. Taxation (continued)

c) Reconciliation between income tax expense and accounting profit (continued)

Having been successfully listed on CSX, the Bank is entitled to a reduction at 50% on the tax on profit for a period of 3 years after listing (proportion based on percentage of listed shares taking 20.0001% as a base in accordance with the Prakas No. 183 on the implementation guidance on the incentive on tax on profit for the IPO enterprise) and waiver of other tax liabilities, including tax on profit and withholding taxes for the period from year N-3 to N-10, where N is the IPO year ("N-3 to N-10"), in accordance with the Sub-decree No. 01 of the Royal Government of Cambodia ("RGC") dated 4 January 2019, and temporary postponement on the prepayment of profit tax for a period of 3 years after listing in accordance with Prakas No. 855 of the Ministry of Economy and Finance ("MEF") dated 24 July 2015. The Bank shall fulfil the forms and summit to GDT through the Securities and Exchange Commission of Cambodia ("SECC") in order to be granted tax incentives.

On 28 May 2020, the Bank submitted a letter to the SECC requesting for their assistance in facilitating with the GDT for the written approval on tax incentive related to the waiver of the tax liabilities for the period from N-3 to N-10. Subsequently on 20 October 2020, the SECC submitted a letter to the GDT requesting for written approval for the said tax incentive for the period from N-3 to N-10. The actual amounts of tax liabilities to be waived will be determined by the GDT. As of the date of these financial statements, the Bank is awaiting written approval from the GDT.

On 27 October 2020, the Bank submitted a letter to the SECC requesting for their assistance in facilitating with the GDT for the written approval on temporary postponement on the prepayment of profit tax for the period of 3 years after listing. On 15 December 2020, GDT approved temporarily postponing on paying prepayment of profit tax for the Bank from November 2020 until the end of tax incentive period.

In addition, on 6 January 2021, the Bank submitted a letter to the SECC requesting for their assistance in facilitating with the GDT for the written approval on tax incentive following the Prakas No. 183 on the implementation guidance on the incentive on tax on profit for the IPO enterprise. As of the date of these financial statements, the Bank is awaiting response from the SECC.

d) Other tax matters

The Bank's and its subsidiaries' tax returns are subject to periodic examination by the respective tax authorities. Some areas of tax laws and regulations may be open to different interpretation; therefore tax amounts reported in the financial statements could be changed at a later date, upon final determination by the respective tax authorities.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

30. Earnings per share

Basic earnings per share are calculated by dividing the profit attributable to equity holders of Bank by the weighted average numbers of ordinary shares in issue during the respective year.

	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Profit attributable to shareholders Weighted average numbers of shares	141,662,037 431,441,693	120,894,720 413,263,649	569,396,098 431,441,693	497,195,570 413,263,649
Basic earnings per share	0.33	0.29	1.32	1.20
Diluted earnings per share	0.33	0.29	1.32	1.20

Diluted earnings per share are calculated by adjusting the weighted average numbers of ordinary shares outstanding to assume conversion of all dilutive potential ordinary shares.

The Bank had no dilutive potential ordinary shares as at each of the year end. As such, the diluted earnings per share were equivalent to the basic earnings per share.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

31. Cash and cash equivalents

		The G	roup			The E	Bank	
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
Cash on hand (Note 5)	412,759,051	421,527,238	1,669,610,361	1,717,723,495	400,816,126	410,955,867	1,621,301,230	1,674,645,158
Deposits and placements with other banks: Balances with the National Bank of Cambodia:								
 Current accounts Negotiable certificate of deposits, 	284,119,485	467,629,288	1,149,263,317	1,905,589,349	264,197,563	448,591,990	1,068,679,142	1,828,012,359
maturities of three months or less Balances with other banks:	552,146,123 -	490,000,000	2,233,431,068	1,996,750,000	552,146,123	490,000,000	2,233,431,068	1,996,750,000
 Current accounts Savings accounts Fixed deposits, maturities of three months 	246,463,022 -	118,728,169 835,762	996,942,924 -	483,817,288 3,405,730	240,035,449 -	109,229,831 835,760	970,943,391 -	445,111,562 3,405,722
or less	1,617,823	-	6,544,094	-	502,678	-	2,033,332	-
-	1,497,105,504	1,498,720,457	6,055,791,764	6,107,285,862	1,457,697,939	1,459,613,448	5,896,388,163	5,947,924,801

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

32. Commitment and contingencies

The Group and the Bank had the contractual amounts of the Group's and the Bank's off-balance sheet financial instruments that commit it to extend credit to customers, guarantee and other facilities as follows:

(a) Loan commitment, guarantee and other financial liabilities

		The G	roup		The Bank				
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
Unused portion of overdrafts	120,937,607	93,060,063	489,192,620	379,219,757	120,108,962	93,060,063	485,840,751	379,219,757	
Bank guarantees	47,038,166	38,432,397	190,269,381	156,612,018	46,831,662	38,405,593	189,434,073	156,502,791	
Letters of credit	7,862,818	8,948,350	31,805,099	36,464,526	7,862,818	8,948,350	31,805,099	36,464,526	
	175,838,591	140,440,810	711,267,100	572,296,301	174,803,442	140,414,006	707,079,923	572,187,074	

No material losses are anticipated as a result of these transactions.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

32. Commitments and contingencies (continued)

(b) Capital expenditure commitments

		The Gro	oup		The Bank					
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
Not later than 1 year Later than 1 but not later than 5 years	4,601,832 146,498	2,700,631	18,614,410 592,584	11,005,071	4,589,155 -	2,182,187 -	18,563,132 -	8,892,412 -		
	4,748,330	2,700,631	19,206,994	11,005,071	4,589,155	2,182,187	18,563,132	8,892,412		

The balances of these commitments are related to the purchases of property and equipment and intangible assets at the Bank amounting to US\$4,589,155, the construction contract to build AIB's building and purchases of other equipment amounting to US\$12,677, the purchases of computer software at ACLEDA Bank Laos Ltd. amounting to US\$146,498.

(c) Other commitments

On 30 May 2016, the Bank guaranteed to IFC to secure the borrowing obtained by its subsidiary, AIB, amounting to US\$13,000,000 maturing on 15 June 2026. The Bank has made allowance for impairment loss of US\$370,448 (2019: US\$448,343) with respect to this guarantee.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

33. Reserves

					1	The Group					
	Genera	l reserves	Regulato	ry reserves		translation erves	Transacti non-con inter	trolling	Other reserves	т	otal
	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)
As at 1 January 2020 Comprehensive income:	398,373,767	1,623,373,099	38,630,578	157,419,606	(22,255,619)	(90,691,647)	-	-	17,984,208	414,748,726	1,708,085,266
Other comprehensive income - currency translation difference						<u> </u>	-	_	(8,160,026)		(8,160,026)
Total comprehensive income for the year			<u> </u>		<u> </u>		<u> </u>	<u> </u>	(8,160,026)	<u> </u>	(8,160,026)
Transactions with owners: Conversion of retained earnings to											
share capital	(4,451,864)	(18,150,250)	-	-	-	-	-	-	-	(4,451,864)	(18,150,250)
Transfers from retained earnings to general reserves	66,285,795	270,247,186	-	-	-	-	-	-	-	66,285,795	270,247,186
Transfer from retained earnings to regulatory reserves	-	-	25,897,174	105,582,778	-	-	-	-	-	25,897,174	105,582,778
Currency translation difference - foreign subsidiaries	-	-	-	-	614,405	2,504,929	-	-	-	614,405	2,504,929
Currency translation differences	-	(13,929,899)	-	(1,987,626)	-	648,007	-	-	3,868,632	-	(11,400,886)
Total transactions with owners:	61,833,931	238,167,037	25,897,174	103,595,152	614,405	3,152,936	-	-	3,868,632	88,345,510	348,783,757
As at 31 December 2020	460,207,698	1,861,540,136	64,527,752	261,014,758	(21,641,214)	(87,538,711)			13,692,814	503,094,236	2,048,708,997

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

33. Reserves (continued)

	ч)					The Group						
	General	reserves	Regulatory reserves		Currency to reser		Transactions with non-controlling interest		Other reserves	Тс	Total	
	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	
As at 1 January 2019	348,162,807	1,398,918,155	51,036,569	205,064,934	(7,121,746)	(28,615,175)	(14,279,344)	(57,374,404)	11,233,393	377,798,286	1,529,226,903	
Comprehensive income: Other comprehensive income- currency translation differences Total comprehensive income		<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	7,330,165		7,330,165	
for the year	-		<u> </u>	<u> </u>					7,330,165	<u> </u>	7,330,165	
Transactions with owners: Transfers from retained earnings to general reserves	50,210,960	204,408,818		_						50,210,960	204,408,818	
Transfer from regulatory reserves to retained earnings Acquisition of non-controlling		-	(12,405,991)	(50,554,413)	-	-	-	-	-	(12,405,991)	(50,554,413)	
interest in AMM Currency translation differences -	-	-	-	-	-	-	14,279,344	58,188,327	-	14,279,344	58,188,327	
foreign subsidiaries Currency translation differences	-	- 20,046,126	-	- 2,909,085	(15,133,873) -	(61,670,532) (405,940)	-	- (813,923)	- (579,350)	(15,133,873) 	(61,670,532) 21,155,998	
Total transactions with owners:	50,210,960	224,454,944	(12,405,991)	(47,645,328)	(15,133,873)	(62,076,472)	14,279,344	57,374,404	(579,350)	36,950,440	171,528,198	
As at 31 December 2019	398,373,767	1,623,373,099	38,630,578	157,419,606	(22,255,619)	(90,691,647)			17,984,208	414,748,726	1,708,085,266	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

33. Reserves (continued)

	The Bank									
	General	reserves	Regulatory	reserves	Other reserves	Τσ	tal			
	US\$	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)	KHR'000 (Note 4)	US\$	KHR'000 (Note 4)			
Balance at 1 January 2020 Comprehensive income:	388,464,324	1,582,992,120	37,245,288	151,774,549	17,601,987	425,709,612	1,752,368,656			
Other comprehensive income-currency translation difference	-	-	-	-	(7,961,797)	-	(7,961,797)			
Total comprehensive income for the year				-	(7,961,797)	-	(7,961,797)			
Transactions with owners:										
Transfers from retained earnings to general reserves	66,949,305	272,952,316	-	-	-	66,949,305	272,952,316			
Transfer from retained earnings to regulatory reserves	-	-	18,082,637	73,722,911	-	18,082,637	73,722,911			
Currency translation differences	-	(13,796,307)	-	(1,696,001)	3,768,024	-	(11,724,284)			
Total transactions with owners:	66,949,305	259,156,009	18,082,637	72,026,910	3,768,024	85,031,942	334,950,943			
As at 31 December 2020	455,413,629	1,842,148,129	55,327,925	223,801,459	13,408,214	510,741,554	2,079,357,802			
As at 1 January 2019	339,813,727	1,365,371,554	49,917,196	200,567,294	11,021,340	389,730,923	1,576,960,188			
Comprehensive income: Other comprehensive income-currency translation difference		<u> </u>		_	7,153,755	<u> </u>	7,153,755			
Total comprehensive income for the year	<u> </u>			-	7,153,755	-	7,153,755			
Transactions with owners:										
Transfers from retained earnings to general reserves	48,650,597	198,056,580	-	-	-	48,650,597	198,056,580			
Transfer from regulatory reserves to retained earnings	-	-	(12,671,908)	(51,638,025)	-	(12,671,908)	(51,638,025)			
Currency translation differences	-	19,563,986	-	2,845,280	(573,108)	-	21,836,158			
Total transactions with owners:	48,650,597	217,620,566	(12,671,908)	(48,792,745)	(573,108)	35,978,689	168,254,713			
As at 31 December 2019	388,464,324	1,582,992,120	37,245,288	151,774,549	17,601,987	425,709,612	1,752,368,656			

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

34. Related party transactions and balances

(a) Related parties and relationships

The related parties of and their relationships with the Bank are as follows:

Related parties	Relationship
ACLEDA Bank Plc.	Holding company
Subsidiaries of the Bank as disclosed in Note 11	Subsidiaries
Shareholders as disclosed in Note 23	Shareholders
Key management personnel	The key management personnel are those persons having the authority and responsibility for planning, directing and controlling the activities of the Group and the Bank either directly or indirectly. The key management personnel of the Group and the Bank include all Directors of the Group and the Bank and members of senior management of the Group and the Bank.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

34. Related party transactions and balances (continued)

(b) Related parties balances

2020 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 2019 <th< th=""><th></th><th></th><th></th><th>The Gr</th><th>oup</th><th></th><th colspan="5">The Bank</th></th<>				The Gr	oup		The Bank				
Key management personnel 13,988,651 5,835,258 56,584,093 23,778,676 12,996,169 5,266,917 52,569,504 21,462,687 Subsidiaries 13,988,651 5,835,258 56,584,093 23,778,676 19,436,759 10,242,118 78,621,691 20,273,944 ii) Balances with related parties 5,835,258 56,584,093 23,778,676 19,436,759 10,242,118 78,621,691 41,736,631 iii) Balances with related parties 412,162 487,356 1,667,195 1,985,976 412,162 487,356 1,667,195 1,985,976 20,033,333 - iiii) Receivables from/(payables to) related parties 412,162 487,356 1,667,195 1,985,976 914,840 487,356 3,700,528 1,985,976 iiiii) Receivables from/(payables to) related parties - 12,329 - 50,241 - 10,908 - 44,450 Key management loan Interest receivables - 12,329 - 50,241 - 10,908 - 44,450 Shareholders (28,375) (16,830) (114,777) (68,582)					KHR'000	KHR'000			KHR'000	KHR'000	
Subsidiaries - <t< td=""><td>i).</td><td>Loans and advances</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></t<>	i).	Loans and advances									
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$			13,988,651	5,835,258	56,584,093	23,778,676	, ,				
ii). Balances with related parties Shareholder Subsidiaries $412,162$ $487,356$ $1,667,195$ $1,985,976$ $412,162$ $487,356$ $1,667,195$ $1,985,976$ Subsidiaries $412,162$ $487,356$ $1,667,195$ $1,985,976$ $502,678$ $ 2,033,333$ $-$ iii). Receivables from/(payables to) related parties Key management loan Interest receivables $ 12,329$ $ 50,241$ $ 10,908$ $ 44,450$ Key management deposit Interest payables $(28,375)$ $(16,830)$ $(114,777)$ $(68,582)$ $(28,375)$ $(16,828)$ $(114,777)$ $(68,574)$ Shareholders Other payables (500) $(1,474)$ $(2,023)$ $(6,007)$ (500) $(1,474)$ $(2,023)$ $(6,007)$ Other payables $ 169,544$ $163,206$ $685,806$ $665,064$ Other payables $ (2,187)$ $(38,565)$ $(8,846)$ $(157,153)$		Subsidiaries	<u> </u>								
Shareholder 412,162 487,356 1,667,195 1,985,976 412,162 487,356 1,667,195 1,985,976 Subsidiaries - <t< td=""><td></td><td></td><td>13,988,651</td><td>5,835,258</td><td>56,584,093</td><td>23,778,676</td><td>19,436,759</td><td>10,242,118</td><td>78,621,691</td><td>41,736,631</td></t<>			13,988,651	5,835,258	56,584,093	23,778,676	19,436,759	10,242,118	78,621,691	41,736,631	
Subsidiaries - - - - 502,678 - 2,033,333 - 412,162 487,356 1,667,195 1,985,976 914,840 487,356 3,700,528 1,985,976 iii). Receivables from/(payables to) related parties Key management loan Interest receivables - 12,329 - 50,241 - 10,908 - 44,450 Key management deposit Interest payables (28,375) (16,830) (114,777) (68,582) (28,375) (16,828) (114,777) (68,574) Shareholders (500) (1,474) (2,023) (6,007) (500) (1,474) (2,023) (6,007) Subsidiaries - - - - 169,544 163,206 685,806 665,064 Other payables - - - - - (2,187) (38,565) (8,846) (157,153)	ii).	•									
412,162 487,356 1,667,195 1,985,976 914,840 487,356 3,700,528 1,985,976 iii). Receivables from/(payables to) related parties Key management loan Interest receivables - 12,329 - 50,241 - 10,908 - 44,450 Key management deposit Interest payables (28,375) (16,830) (114,777) (68,582) (28,375) (16,828) (114,777) (68,574) Shareholders (500) (1,474) (2,023) (6,007) (500) (1,474) (2,023) (6,007) Subsidiaries - - - - - 169,544 163,206 685,806 665,064 Other payables - - - - - (2,187) (38,565) (8,846) (157,153)			412,162	487,356	1,667,195	1,985,976		487,356	, ,	1,985,976	
iii). Receivables from/(payables to) related parties Key management loan Interest receivables - 12,329 - 50,241 - 10,908 - 44,450 Key management deposit Interest payables (28,375) (16,830) (114,777) (68,582) (28,375) (16,828) (114,777) (68,574) Shareholders (500) (1,474) (2,023) (6,007) (500) (1,474) (2,023) (6,007) Subsidiaries - - - 169,544 163,206 685,806 665,064 Other payables - - - - (2,187) (38,565) (8,846) (157,153)		Subsidiaries	-	-	-	-		-		-	
Key management loan Interest receivables - 12,329 - 50,241 - 10,908 - 44,450 Key management deposit Interest payables (28,375) (16,830) (114,777) (68,582) (28,375) (16,828) (114,777) (68,574) Shareholders (500) (1,474) (2,023) (6,007) (500) (1,474) (2,023) (6,007) Subsidiaries (500) (1,474) (2,023) (6,007) (500) (1,474) (2,023) (6,007) Other receivables - - - 169,544 163,206 685,806 665,064 Other payables			412,162	487,356	1,667,195	1,985,976	914,840	487,356	3,700,528	1,985,976	
Key management deposit Interest payables (28,375) (16,830) (114,777) (68,582) (28,375) (16,828) (114,777) (68,574) Shareholders (500) (1,474) (2,023) (6,007) (500) (1,474) (2,023) (6,007) Subsidiaries - - - - 169,544 163,206 685,806 665,064 Other payables - - - - (2,187) (38,565) (8,846) (157,153)	iii).	Key management loan		40.000		50.044		40.000		44.450	
Interest payables (28,375) (16,830) (114,777) (68,582) (28,375) (16,828) (114,777) (68,574) Shareholders (500) (1,474) (2,023) (6,007) (500) (1,474) (2,023) (6,007) Subsidiaries - - - 169,544 163,206 685,806 665,064 Other payables			-	12,329	-	50,241	-	10,908	-	44,450	
Subsidiaries - - - 169,544 163,206 685,806 665,064 Other receivables - - - - (2,187) (38,565) (8,846) (157,153)		Interest payables	(28,375)	(16,830)	(114,777)	(68,582)	(28,375)	(16,828)	(114,777)	(68,574)	
Other receivables - - - - 169,544 163,206 685,806 665,064 Other payables - - - - (2,187) (38,565) (8,846) (157,153)		Other payables	(500)	(1,474)	(2,023)	(6,007)	(500)	(1,474)	(2,023)	(6,007)	
(28 875) (5 975) (116 800) (24 348) 138 482 117 247 560 160 477 780		Other receivables	-	-	-	-			,	,	
			(28,875)	(5,975)	(116,800)	(24,348)	138,482	117,247	560,160	477,780	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

34. Related party transactions and balances (continued)

(b) Related parties balances (continued)

		The Group The Bank					ank	
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)
iv). Deposits from related parties			. ,	. ,			. ,	. ,
Key management personnel Shareholders	5,206,782	2,219,783	21,061,433	9,045,616	4,513,852	2,157,137	18,258,531	8,790,333
Current accounts	12,867,384	4,180,078	52,048,568	17,033,818	12,867,384	4,180,078	52,048,568	17,033,818
Saving accounts	99,712	24,678	403,335	100,563	99,712	24,678	403,335	100,563
Fixed deposits Subsidiaries	150,500	301,474	608,773	1,228,507	150,500	301,474	608,773	1,228,507
Current accounts	-	-	-	-	1,637,224	5,777,256	6,622,571	23,542,318
Saving accounts	-	-	-	-	180,135	157,520	728,646	641,894
Fixed deposits	-	23,445	-	95,539	1,699,962	2,883,445	6,876,346	11,750,039
	18,324,378	6,749,458	74,122,109	27,504,043	21,148,769	15,481,588	85,546,770	63,087,472
v). Borrowings from related parties								
Shareholders		699,680		2,851,196			-	-

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

34. Related party transactions and balances (continued)

(c) Related parties transactions

(,)		The Group					The Bank		
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)	
i). Interest income from related parties									
Loans and advances to key management	1,118,336	188,530	4,559,456	768,260	1,074,031	132,479	4,378,824	539,852	
Deposit from shareholder	16,989	-	69,264	-	16,989	-	69,264	-	
Deposits with subsidiary	-	-	-	-	6,720	23,978	27,397	97,710	
Loan to subsidiary				-	392,804	229,167	1,601,462	933,856	
	1,135,325	188,530	4,628,720	768,260	1,490,544	385,624	6,076,947	1,571,418	
ii). Fee and commission income from related parties									
Shareholders	28,063	28,063	114,413	114,357	28,063	28,063	114,413	114,357	
Subsidiaries	-	-	-	-	12,288	7,570	50,099	30,848	
	28,063	28,063	114,413	114,357	40,351	35,633	164,512	145,205	
iii). Interest expenses to related parties									
Deposits of key management	147,282	136,889	600,469	557,823	135,704	133,304	553,265	543,214	
Borrowing from shareholders	44,373	219,350	180,909	893,851	-	-	-	-	
Deposits of shareholders	201,670	15,501	822,208	63,167	201,670	15,501	822,208	63,167	
Deposits of subsidiaries	-	-	-	-	95,393	104,564	388,917	426,098	
	393,325	371,740	1,603,586	1,514,841	432,767	253,369	1,764,390	1,032,479	
iv). Fee and remuneration expenses to related parties									
Board of Directors	829,387	1,022,611	3,381,411	4,167,140	527,704	577,284	2,151,449	2,352,432	
Key management	7,682,706	7,592,063	31,322,392	30,937,657	5,990,537	5,832,800	24,423,419	23,768,660	
Subsidiary	-	-	-	-	2,200,796	1,411,007	8,972,645	5,749,854	
	8,512,093	8,614,674	34,703,803	35,104,797	8,719,037	7,821,091	35,547,513	31,870,946	
v). Other commitments									
ECL on financial guarantee on AIB's debt from IFC		448,343	-	1,826,998	370,448	448,343	1,510,316	1,826,998	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management

(a) Introduction and overview

For the purpose of the risk management policy, risk is defined as the possibility that the outcome of an action or event could adversely affect the ability to meet business objectives or capital of the Bank.

The Bank's approach to the identification and assessment of key risk and controls is undertaken across all business areas of the Bank. This risk management process is effected by the Group's and the Bank's Board of Directors, management, and other personnel, applied in strategy setting and across the enterprise, designed to identify potential events that may affect the entity, and manage risk to be within the risk appetite, provide reasonable assurance regarding the achievement of objectives.

Changes in certain macro-economic variables represent environmental stresses which may reveal systemic credit, market risk sensitivities and risk contagion. These stress tests do include worst case scenarios to test the (combined) risks that could break the Bank and to test what combined set of events would be needed to break the Bank (reverse stress test).

(b) Objective and principles

The objective of the risk management policy is to set standards for the Bank's enterprise-wide risk management in a way that optimally balances managing risk while adding value to the Bank, and this policy is applicable to all levels of the Bank.

Risk appetite is defined as the amount and type of risk, on a broad level, an organization is willing to accept in pursuit of long-term shareholder value. Risk tolerance refers to the variation amount of maximum of risk which can be accepted, taking into account the appropriate measure to reduce the risk.

The Bank's risk appetite and tolerance statement is prepared in accordance with its business strategy and the role of the Bank in the financial system.

The Board approves the Bank's risk appetite and tolerance statement with considering the most significant risk which the Bank is exposed and provides an outline of the approach to manage these risks.

The risk management policy distinguishes different risk categories in line with the categories identified by the Basel Accords as issued by the Basel Committee on Banking Supervision. The policy sets risk tolerance/internal targets per individual risk category.

At all times the Bank shall adhere to the prudential ratios and requirements as stipulated by the superintendent.

At all times, unless specifically mentioned otherwise, the Bank shall adhere to the risk tolerance/internal targets, as set by the Board in the risk management policy, in order to limit potential loss.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

The Group's and the Bank's activities expose it to a variety of financial risks: credit risk, market risk (including currency risk, and interest rate risk), and liquidity risk. Taking risk is core to the financial business, and the operational risks are an inevitable consequence of being in business.

The Group and the Bank hold the following financial assets and liabilities:

		The G	Group			The	Bank	
	2020	2019	2020	2019	2020	2019	2020	2019
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000
			(Note 4)	(Note 4)			(Note 4)	(Note 4)
Financial assets								
Cash on hand	412,759,051	421,527,238	1,669,610,361	1,717,723,495	400,816,126	410,955,867	1,621,301,230	1,674,645,158
Deposits and placements with other banks	534,653,146	587,730,531	2,162,671,976	2,395,001,914	507,629,407	558,612,340	2,053,360,951	2,276,345,286
Financial investments	566,674,523	527,474,976	2,292,198,446	2,149,460,527	566,674,523	527,474,976	2,292,198,446	2,149,460,527
Loans and advances	4,471,300,618	3,846,020,519	18,086,411,000	15,672,533,615	4,292,649,159	3,686,578,943	17,363,765,848	15,022,809,193
Other assets	6,921,852	5,918,866	27,998,891	24,119,379	6,923,222	5,935,692	28,004,433	24,187,945
Total financial assets	5,992,309,190	5,388,672,130	24,238,890,674	21,958,838,930	5,774,692,437	5,189,557,818	23,358,630,908	21,147,448,109
Financial liabilities								
Deposits and placements of other banks and								
financial institutions	317,009,459	285,175,145	1,282,303,262	1,162,088,716	296,764,554	274,277,721	1,200,412,621	1,117,681,713
Deposits from customers	4,294,286,048	4,082,722,853	17,370,387,064	16,637,095,626	4,180,268,737	3,982,146,559	16,909,187,041	16,227,247,228
Other liabilities	28,699,228	27,251,397	116,088,377	111,049,443	28,488,959	26,115,905	115,237,839	106,422,313
Lease liabilities	28,617,902	30,915,939	115,759,414	125,982,451	25,772,385	27,789,168	104,249,297	113,240,860
Borrowings	542,398,916	564,971,701	2,194,003,615	2,302,259,682	507,352,916	518,068,128	2,052,242,545	2,111,127,622
Subordinated debts	167,158,623	139,302,580	676,156,630	567,658,014	167,158,623	139,302,580	676,156,630	567,658,014
Total financial liabilities	5,378,170,176	5,130,339,615	21,754,698,362	20,906,133,932	5,205,806,174	4,967,700,061	21,057,485,973	20,243,377,750
Net financial assets	614,139,014	258,332,515	2,484,192,312	1,052,704,998	568,886,263	221,857,757	2,301,144,935	904,070,359

NOTES TO THE FINANCIAL STATEMENTS (CONITNUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk

Credit risk is the risk that a counterparty would fail to meet its obligations in accordance with agreed terms. While loans are the most obvious source of credit risk, other sources of credit risk exist throughout the activities of an institution, including in the banking book and the trading book, in both on and off-balance sheets. Institutions are facing credit risks in various financial instruments other than loans, including acceptance, trade financing, the commitment and guarantee, interbank transaction, the settlement of transactions, foreign exchange transactions, bonds, equities and financial derivative instruments.

Principles of the credit risk:

- The Board recognises that the loan book is the main sources of income for the Bank and, conversely, also constitutes the greatest risk of losses.
- The Board considers that lending to the lower segments of the market of small business loans, provided the existing policies are implemented properly, carries a credit risk which is smaller than for larger loans as history has shown that losses due to default on these loans have been minimal. The Board considers the risk return equation favourable for loans provided to the lower segments in the market and considers this the core product of the Bank.
- The Board considers that management has freedom to adjust, adapt or develop existing products and product lines but requires that new product lines need to be approved by the Board.
- The day-to-day responsibility for the credit risk lies with the senior management of the Credit Division and with branch management and branch credit officers.
- The credit risk is regularly measured by calculating the expected loss taking probability of customer defaults, exposure in the event of default and severity of loss given default of the customer base where credit scoring is applied for.
- The Board requires that credit risk is spread across different sectors (like trade, agriculture, services, industrial, infrastructure etc.) and products to avoid undue over exposure to one particular sector or industry.
- Systemic risk is the risk of system wide breakdown of the financial sector. The Board requires that credit
 risk on counterparty financial institutions should be subject to the same principles of the prudential
 assessment and controls as with other forms of lending and prudential position limits should be set to
 sufficiently protect the Bank for a systemic risk.

Internal targets of the credit risk:

The internal targets on credit products should be set by the Board Risk Management Committee and approved by the Board. The internal targets will be in line with the risk appetite of the Board.

The Risk Management Division regularly reviews all internal targets as set and approved by the Board and advises on any change deemed appropriate.

NOTES TO THE FINANCIAL STATEMENTS (CONITNUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

In order to maintain the credit growth in a prudent and reasonable way and to ensure the maintenance of portfolio quality, various control limits have been imposed to credit products, which must be strictly complied with:

- Loan exposure ratio: defined as the aggregate amount of loan assets in arrears > 30 days minus loan loss reserves divided by the Bank's net worth should be less than 25%.
- Ceilings on lending to sectors and by product to put limits on concentration risk.
- The maximum exposure to a single client or group of clients is up to 5% of the Bank's net worth.
- Counterparty financial institutions.

(a) Credit risk management

The Boards of Directors has delegated responsibility for oversight of credit risk to its Board of Risk Management and IT Committee ("BRIC"). Credit Division is responsible for management of the credit risk based on the following:

- Separation of roles between the persons involved in dealing with the clients that are responsible for the credit application and the persons involved in the authorisation of the credits.
- Separation of roles between the persons involved in dealing directly with clients and the credit administration.
- Principle of double authorisation to ensure a good balance of the interests of the clients and objectivity in the risk assessment process.
- Timely and full documentation of the agreements made with the client together with all needed information, which is relevant in the assessment and control phase of the credit process.
- Careful credit control systems, with periodical reviews, through which timely signals can be derived, for relevant information regarding risk management.
- Independent control to ensure conformity with approved procedures and regulations in the credit process (formal control) but also monitoring the quality of risk aspects and credit control (material control).
- The Bank will maintain a diversified loan assets portfolio in terms of industry sector, geographical area, and currency and loan size.
- Loan analysis will strongly focus on the client's ability and willingness to repay the loan through character and cash flow based on assessment and in applying green-lining methodology.
- The Bank's total exposure to a single client or group of clients (one obligor principle) acting in concert shall not exceed 5% of the Bank's net worth. "Exposure" includes the aggregate of (i) the face amount of the assets of the Borrower with respect to which such Person is the obligor and (ii) any claim of such Person against the Borrower comprising any commitment to provide funds or credit to, or on behalf of such Person including, but not limited to, loan guarantees, letters of credit and derivatives.

NOTES TO THE FINANCIAL STATEMENTS (CONITNUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(b) Internal targets and mitigation policies

The Group and the Bank operates and provides loans and advances to individuals or enterprises within the Kingdom of Cambodia, Lao PDR, and the Republic of the Union of Myanmar. The Group and the Bank manages limits and controls concentration of credit risk whenever they are identified. Large exposure is defined by the National Bank of Cambodia as overall exposure to any individual beneficiary which exceeds 10% of the net worth.

The Bank is required, under the conditions of Prakas No. B7-06-226 of the National Bank of Cambodia, to maintain at all times a maximum ratio of 20% between the Bank's overall credit exposure to any individual beneficiary and the Bank's net worth. The aggregation of large credit exposure must not exceed 300% of the Bank's net worth.

The Group and the Bank employs a range of policies and practices to mitigate credit risk. The most traditional of these is the taking of security in the form of collateral for loans and advances to customers, which is common practice. The Group and the Bank implements guidelines on the acceptability of specific classes of collateral or credit risk mitigation. The principal collateral types to secure for loans and advances to customers are:

- Mortgages over residential properties (land, building and other properties);
- Charges over business assets such as land and buildings;
- Cash in the form of margin deposits.
- (c) Maximum exposure to credit risk before collateral held or other credit enhancements

For financial assets reflected in the balance sheet, the exposure to credit risk equals their carrying amount. For financial guarantees and similar contract granted, it is the maximum amount that the Group and the Bank would have to pay if the guarantees were called upon. For credit related commitments and contingents that are irrevocable over the life of the respective facilities, it is generally the full amount of the committed facilities.

NOTES TO THE FINANCIAL STATEMENTS (CONITNUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(c) Maximum exposure to credit risk before collateral held or other credit enhancements (continued)

		The G	roup			The Ba	ank	
	2020	2019	2020	2019	2020	2019	2020	2019
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000
			(Note 4)	(Note 4)			(Note 4)	(Note 4)
Credit exposure for on-balance sheet financial assets:								
Cash on hand	412,759,051	421,527,238	1,669,610,361	1,717,723,495	400,816,126	410,955,867	1,621,301,230	1,674,645,158
Deposits and placements with other banks	534,653,146	587,730,531	2,162,671,976	2,395,001,914	507,629,407	558,612,340	2,053,360,951	2,276,345,286
Financial investments	566,674,523	527,474,976	2,292,198,446	2,149,460,527	566,674,523	527,474,976	2,292,198,446	2,149,460,527
Loans and advances	4,471,300,618	3,846,020,519	18,086,411,000	15,672,533,615	4,292,649,159	3,686,578,943	17,363,765,848	15,022,809,193
Other assets	6,921,852	5,918,866	27,998,891	24,119,379	6,923,222	5,935,692	28,004,433	24,187,945
	5,992,309,190	5,388,672,130	24,238,890,674	21,958,838,930	5,774,692,437	5,189,557,818	23,358,630,908	21,147,448,109
Credit exposure for off-balance sheet items:								
Unused portion of loan commitment	120,937,607	93,060,063	489,192,620	379,219,757	120,108,962	93,060,063	485,840,751	379,219,757
Bank guarantees	47,038,166	38,432,397	190,269,381	156,612,018	46,831,662	38,405,593	189,434,073	156,502,791
Letters of credit	7,862,818	8,948,350	31,805,099	36,464,526	7,862,818	8,948,350	31,805,099	36,464,526
	175,838,591	140,440,810	711,267,100	572,296,301	174,803,442	140,414,006	707,079,923	572,187,074
Total maximum credit risk exposure	6,168,147,781	5,529,112,940	24,950,157,774	22,531,135,231	5,949,495,879	5,329,971,824	24,065,710,831	21,719,635,183

The above table represents a worst case scenario of credit risk exposure to the Group and the Bank at 31 December 2020 and 31 December 2019, without taking into account any collateral held or other credit enhancements attached. For on-balance sheet assets, the exposures set out above are based on net carrying amounts.

NOTES TO THE FINANCIAL STATEMENTS (CONITNUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(c) Maximum exposure to credit risk before collateral held or other credit enhancements (continued)

As shown above, 72.49% for the Group and 72.15% for the Bank of total maximum exposure is derived from loans and advances to customers (2019: 69.56% and 69.17% for the Group and for the Bank).

Management is confident in its ability to continue to control and sustain minimal exposure of credit risk to the Group resulting from its loans and advances on the followings. Approximately 98.59% of loans and advances of the Bank are collateralised. According to Credit Operating Manual, loan size must not exceed 75% of estimated saleable value of the pledged collateral.

(d) Concentration of financial assets with credit risk exposure

A concentration of credit risk exists when a number of counterparties are engaged in similar activities and have similar economic characteristics that would cause their ability to meet contractual obligations to be similarly affected by changes in economic or other conditions. The Group and the Bank analysed the concentration of credit risk by geographic purpose and industry sector as follows:

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(d) Concentration of risks of financial assets with credit risk exposure (continued)

(i) Geographical sector

The analysis of credit risk concentrations (without taking into account any collateral held or other credit enhancements) based on the location of the counterparty as at 31 December 2020 and 31 December 2019 are as follows:

					The Group				
	Cambodia US\$	France US\$	Germany US\$	Lao US\$	Singapore US\$	USA US\$	Myanmar US\$	Other US\$	Total US\$
As at 31 December 2020									
Credit exposure for on-balance sheet									
financial assets:									
Cash on hand	400,829,300	-	-	11,624,911	-	-	304,840	-	412,759,051
Deposits and placements with other banks	269,022,932	631,569	568,916	20,612,267	263,969	232,975,901	4,823,475	5,754,117	534,653,146
Financial investments	566,674,523	-	-	-	-	-	-	-	566,674,523
Loans and advances	4,286,426,601	-	-	140,902,367	-	-	43,971,650	-	4,471,300,618
Other assets	6,774,532	-	-	147,320	-	-	-	-	6,921,852
	5,529,727,888	631,569	568,916	173,286,865	263,969	232,975,901	49,099,965	5,754,117	5,992,309,190
Credit exposure for off-balance sheet items:									
Unused portion of loan commitment	120,108,962	-	-	828,645	-	-	-	-	120,937,607
Bank guarantees	46,831,662	-	-	206,504	-	-	-	-	47,038,166
Letters of credit	7,862,818	-	-	-	-	-	-	-	7,862,818
	174,803,442	-	-	1,035,149	-	-	-	-	175,838,591
Total maximum credit risk exposure	5,704,531,330	631,569	568,916	174,322,014	263,969	232,975,901	49,099,965	5,754,117	6,168,147,781
In KHR'000 equivalent (Note 4)	23,074,829,230	2,554,697	2,301,265	705,132,547	1,067,755	942,387,520	198,609,358	23,275,403	24,950,157,775

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(d) Concentration of risks of financial assets with credit risk exposure (continued)

(i) Geographical sector (continued)

					The Group				
	Cambodia US\$	France US\$	Germany US\$	Lao US\$	Singapore US\$	USA US\$	Myanmar US\$	Other US\$	Total US\$
As at 31 December 2019 Credit exposure for on-balance sheet financial assets:									
Cash on hand	410,967,945	-	-	9,921,052	-	-	638,241	-	421,527,238
Deposits and placements with other banks	448,941,957	2,151,232	706,870	20,994,697	1,234,919	96,971,492	6,636,667	10,092,697	587,730,531
Financial investments	527,474,976	-	-	-	-	-	-	-	527,474,976
Loans and advances	3,682,243,140	-	-	127,268,578	-	-	36,508,801	-	3,846,020,519
Other assets	5,869,891	-	-	48,975	-	-	-	-	5,918,866
	5,075,497,909	2,151,232	706,870	158,233,302	1,234,919	96,971,492	43,783,709	10,092,697	5,388,672,130
Credit exposure for off-balance sheet items:									
Unused portion of loan commitment	93,060,063	-	-	-	-	-	-	-	93,060,063
Bank guarantees	38,405,593	-	-	26,804	-	-	-	-	38,432,397
Letters of credit	8,948,350			-	-	-	-		8,948,350
	140,414,006	<u> </u>		26,804			-	-	140,440,810
Total maximum credit risk exposure	5,215,911,915	2,151,232	706,870	158,260,106	1,234,919	96,971,492	43,783,709	10,092,697	5,529,112,940
In KHR'000 equivalent (Note 4)	21,254,841,054	8,766,270	2,880,495	644,909,932	5,032,295	395,158,830	178,418,614	41,127,740	22,531,135,230

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(d) Concentration of risks of financial assets with credit risk exposure (continued)

(i) Geographical sector (continued)

	The Bank								
	Cambodia US\$	France US\$	Germany US\$	Lao US\$	Singapore US\$	USA US\$	Myanmar US\$	Other US\$	Total US\$
As at 31 December 2020									
Credit exposure for on-balance sheet financial assets:									
Cash on hand	400,816,126	-	-	-	-	-	-	-	400,816,126
Deposits and placements with other banks	267,444,421	631,569	568,916	499,861	263,969	232,975,901	46,873	5,197,897	507,629,407
Financial investments	566,674,523	-	-	-	-	-	-	-	566,674,523
Loans and advances	4,292,649,159	-	-	-	-	-	-	-	4,292,649,159
Other assets	6,756,356	-	-	-	-	-	166,866	-	6,923,222
	5,534,340,585	631,569	568,916	499,861	263,969	232,975,901	213,739	5,197,897	5,774,692,437
Credit exposure for off-balance sheet items:									
Unused portion of loan commitment	120,108,962	-	-	-	-	-	-	-	120,108,962
Bank guarantees	46,831,662	-	-	-	-	-	-	-	46,831,662
Letters of credit	7,862,818	-	-	-	-	-	-	-	7,862,818
	174,803,442	-		-	-	-	-	-	174,803,442
Total maximum credit risk exposure	5,709,144,027	631,569	568,916	499,861	263,969	232,975,901	213,739	5,197,897	5,949,495,879
In KHR'000 equivalent (Note 4)	23,093,487,589	2,554,697	2,301,265	2,021,938	1,067,755	942,387,520	864,574	21,025,493	24,065,710,831

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(d) Concentration of risks of financial assets with credit risk exposure (continued)

(i) Geographical sector (continued)

					The Bank				
	Cambodia US\$	France US\$	Germany US\$	Lao US\$	Singapore US\$	USA US\$	Myanmar US\$	Other US\$	Total US\$
As at 31 December 2019									
Credit exposure for on-balance sheet financial assets:	:								
Cash on hand	410,955,867	-	-	-	-	-	-	-	410,955,867
Deposits and placements with other banks	448,876,239	2,151,232	706,870	-	1,234,919	96,971,492	46,944	8,624,644	558,612,340
Financial investments	527,474,976	-	-	-	-	-	-	-	527,474,976
Loans and advances	3,686,578,943	-	-	-	-	-	-	-	3,686,578,943
Other assets	5,772,701			798		-	162,193		5,935,692
	5,079,658,726	2,151,232	706,870	798	1,234,919	96,971,492	209,137	8,624,644	5,189,557,818
Credit exposure for off-balance sheet items:									
Unused portion of loan commitment	93,060,063	-	-	-	-	-	-	-	93,060,063
Bank guarantees	38,405,593	-	-	-	-	-	-	-	38,405,593
Letters of credit	8,948,350	-	-	-	-	-	-	-	8,948,350
Forward foreign exchange	-	-	-	-	-	-	-	-	-
	140,414,006	-	-	-	-	-	-	-	140,414,006
Total maximum credit risk exposure	5,220,072,732	2,151,232	706,870	798	1,234,919	96,971,492	209,137	8,624,644	5,329,971,824
In KHR'000 equivalent (Note 4)	21,271,796,383	8,766,270	2,880,495	3,252	5,032,295	395,158,830	852,233	35,145,424	21,719,635,182

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(d) Concentration of risks of financial assets with credit risk exposure (continued)

(ii) Industry sectors

The analysis of credit risk concentrations (without taking into account any collateral held or other credit enhancements) at carrying amount as at 31 December 2020 and 31 December 2019 based on the industry sectors of the counterparty are as follows:

				The G	roup			
	Financial institutions US\$	Wholesale and retail US\$	Services US\$	Housing US\$	Manufacturing US\$	Agriculture US\$	Other US\$	Total US\$
As at 31 December 2020 Credit exposure for on-balance sheet financial assets:								
Cash on hand	412,759,051	-	-	-	-	-	-	412,759,051
Deposits and placements with other banks Financial investments	534,653,146 566,520,994	-	-	-	-	-	- 153,529	534,653,146 566,674,523
Loans and advances	22,672,936	- 1,511,327,042	- 1,086,409,481	- 160,232,558	- 130,933,136	- 888,839,788	670,885,677	4,471,300,618
Other assets	3,787,686	4 511 227 042				-	3,134,166	6,921,852
Credit exposure for off-balance sheet items:	1,540,393,813	1,511,327,042	1,086,409,481	160,232,558	130,933,136	888,839,788	674,173,372	5,992,309,190
Unused portion of loan commitment	-	-	-	-	-	-	120,937,607	120,937,607
Bank guarantees Letters of credit	-	-	-	-	-	-	47,038,166 7,862,818	47,038,166 7,862,818
		-	-		-		175,838,591	175,838,591
Total maximum credit risk exposure	1,540,393,813	1,511,327,042	1,086,409,481	160,232,558	130,933,136	888,839,788	850,011,963	6,168,147,781
In KHR'000 equivalent (Note 4)	6,230,892,974	6,113,317,885	4,394,526,351	648,140,697	529,624,535	3,595,356,942	3,438,298,390	24,950,157,774

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(d) Concentration of risks of financial assets with credit risk exposure (continued)

(ii) Industry sectors (continued)

				The Gro	oup			
	Financial institutions US\$	Wholesale and retail US\$	Services US\$	Housing US\$	Manufacturing US\$	Agriculture US\$	Other US\$	Total US\$
As at 31 December 2019								
Credit exposure for on-balance sheet financial assets:								
Cash on hand	421,527,238	-	-	-	-	-	-	421,527,238
Deposits and placements with other banks	587,730,531	-	-	-	-	-	-	587,730,531
Financial investments	527,321,447	-	-	-	-	-	153,529	527,474,976
Loans and advances	7,892,238	1,348,508,445	1,042,121,138	183,308,546	103,528,643	751,254,104	409,407,405	3,846,020,519
Other assets	3,996,131	-	-	-	-	-	1,922,735	5,918,866
	1,548,467,585	1,348,508,445	1,042,121,138	183,308,546	103,528,643	751,254,104	411,483,669	5,388,672,130
Credit exposure for off-balance sheet items:								
Unused portion of loan commitment	-	-	-	-	-	-	93,060,063	93,060,063
Bank guarantees	-	-	-	-	-	-	38,432,397	38,432,397
Letters of credit		-	-	-		-	8,948,350	8,948,350
		-			-		140,440,810	140,440,810
Total maximum credit risk exposure	1,548,467,585	1,348,508,445	1,042,121,138	183,308,546	103,528,643	751,254,104	551,924,479	5,529,112,940
In KHR'000 equivalent (Note 4)	6,310,005,409	5,495,171,913	4,246,643,637	746,982,325	421,879,220	3,061,360,474	2,249,092,252	22,531,135,230

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(d) Concentration of risks of financial assets with credit risk exposure (continued)

(ii) Industry sectors (continued)

				The Bar	nk			
	Financial	Wholesale and						
	institutions	retail	Services	Housing	Manufacturing	Agriculture	Other	Total
	US\$	US\$	US\$	US\$	US\$	US\$	US\$	US\$
As at 31 December 2020								
Credit exposure for on-balance sheet financial assets:								
Cash on hand	400,816,126	-	-	-	-	-	-	400,816,126
Deposits and placements with other banks	507,629,407	-	-	-	-	-	-	507,629,407
Financial investments	566,520,994	-	-	-	-	-	153,529	566,674,523
Loans and advances	22,672,936	1,433,948,336	1,056,238,093	159,289,851	124,058,057	848,241,547	648,200,339	4,292,649,159
Other assets	3,832,887	-	-		-	-	3,090,335	6,923,222
	1,501,472,350	1,433,948,336	1,056,238,093	159,289,851	124,058,057	848,241,547	651,444,203	5,774,692,437
Credit exposure for off-balance sheet items:								
Unused portion of loan commitment	_	_	_	_	_	-	120,108,962	120,108,962
Bank guarantees		-	_			_	46,831,662	46,831,662
Letters of credit		_					7,862,818	7,862,818
							174,803,442	174,803,442
	<u> </u>	<u> </u>	<u> </u>	<u> </u>		<u> </u>	174,003,442	174,000,442
Total maximum credit risk exposure	1,501,472,350	1,433,948,336	1,056,238,093	159,289,851	124,058,057	848,241,547	826,247,645	5,949,495,879
In KHR'000 equivalent (Note 4)	6,073,455,656	5,800,321,019	4,272,483,086	644,327,447	501,814,841	3,431,137,058	3,342,171,724	24,065,710,831

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(d) Concentration of risks of financial assets with credit risk exposure (continued)

(ii) Industry sectors (continued)

				The E	Bank			
	Financial institutions	Wholesale and retail	Services	Housing	Manufacturing	Agriculture	Other	Total
	US\$	US\$	US\$	US\$	US\$	US\$	US\$	US\$
As at 31 December 2019								
Credit exposure for on-balance sheet financial assets:								
Cash on hand	410,955,867	-	-	-	-	-	-	410,955,867
Deposits and placements with other banks	558,612,340	-	-	-	-	-	-	558,612,340
Financial investments	527,321,447	-	-	-	-	-	153,529	527,474,976
Loans and advances	7,892,238	1,277,549,332	1,014,175,262	181,800,701	97,393,627	715,961,507	391,806,276	3,686,578,943
Otherassets	4,127,246	-	-	-	-	-	1,808,446	5,935,692
	1,508,909,138	1,277,549,332	1,014,175,262	181,800,701	97,393,627	715,961,507	393,768,251	5,189,557,818
Credit exposure for off-balance sheet items:								
Unused portion of loan commitment	-	-	-	-	-	-	93,060,063	93,060,063
Bank guarantees	-	-	-	-	-	-	38,405,593	38,405,593
Letters of credit	-		-	-	-	-	8,948,350	8,948,350
							140,414,006	140,414,006
Total maximum credit risk exposure	1,508,909,138	1,277,549,332	1,014,175,262	181,800,701	97,393,627	715,961,507	534,182,257	5,329,971,824
In KHR'000 equivalent (Note 4)	6,148,804,737	5,206,013,528	4,132,764,193	740,837,857	396,879,030	2,917,543,141	2,176,792,697	21,719,635,183

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(e) Write-off policy

It can be written off under the judgment of the Management Credit Committee (MCC) in case when the Bank loses control on its contractual rights over that facility or when all or part of the facility is deemed uncollectable; this is particularly the case when there is no realistic prospect of recovery for the counterparty or when the Bank has lost control over its contractual rights on the facility due to any decision of a court of law. Circumstances where a facility should be written off also include, but are not limited to:

- a) All forms of securities or collateral have been called and realized but proceeds failed to cover the entire outstanding amount of the facility;
- b) The Bank is unable to collect, or there is no longer reasonable assurance that the Bank will collect all amounts due according to the contractual terms of the facility's agreement;
- c) The counterparty has become bankrupt or is undergoing other forms of financial restructuring the consequence of which it is unlikely that it may service the facility;
- d) The facility has been classified under loss category.
- (f) Credit quality of financial assets

CIFRS 9 introduces the concept of ECL of which the Bank expects to experience on an account over either a 12-month horizon (Stage 1) or a lifetime horizon (Stage 2 & 3). The change in approach to provisioning introduced by CIFRS 9 is designed to:

- Ensure a timely recognition of credit losses, which is more reflective than the previous Incurred Loss Model;
- Distinguish between financial instruments that have significantly deteriorated in credit quality and those that have not; and
- Provide a better estimate of ECLs given the macroeconomic environment.

The Group and the Bank apply a three-stage approach based on the change in credit quality since initial recognition:

3-Stage	Stage 1	Stage 2	Stage 3	
approach	Performing	Underperforming	Nonperforming	
Recognition of expected credit losses	12 months expected credit losses	Lifetime expected credit losses	Lifetime expected credit losses	
Criterion	No significant increase in credit risk	Credit risk increased significantly	Credit impaired assets	
Basis of calculation of profit revenue	On gross carrying amount	On gross carrying amount	On net carrying amount	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

Recognition of ECL

Financial assets will be classified and recognised into three different categories which are:

- a) Financial assets measured at amortised cost;
- b) Financial assets measured at fair value through other comprehensive income;
- c) Financial assets measured at fair value through profit and loss.

Financial assets and debts that are measured at amortised cost or through other comprehensive income will be subjected to impairment assessment.

The Bank measured ECL by using the general approach and the simplified approach.

The general approach consists of segregating the customers into three different stages according to the staging criteria by assessing the credit risk. 12-month ECL will be computed for stage 1, while lifetime ECL will be computed for stage 2 and stage 3. At each reporting date, the Bank will assess credit risk of each account as compared to the risk level at origination date.

Below is a table showing a summary of credit risk status and period for ECL calculation by stages:

Long-term facilities (more than one year)

Stages	Credit Risk Status	Grades	DPD	Default Indicator
1	No significant increase in credit risk	Normal	0≤DPD<30	Performing
2	Credit risk increased significantly	Special Mention	30 ≤ DPD < 90	Underperforming
		Substandard	90 ≤ DPD < 180	
3	Credit impaired assets	Doubtful	180 ≤ DPD <360	Nonperforming
		Loss	DPD ≥ 360	

Short-term facilities (one year or less)

Stages	Credit Risk Status	Grades	DPD	Default Indicator
1	No significant increase in credit risk	Normal	0 ≤ DPD ≤ 14	Performing
2	Credit risk increased significantly	Special Mention	15≤DPD≤30	Underperforming
		Substandard	31 ≤ DPD ≤ 60	
3	Credit impaired assets	Doubtful	61 ≤ DPD ≤ 90	Nonperforming
		Loss	DPD ≥ 91	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

Recognition of ECL (continued)

The Bank will use the day past due ("DPD") information and NBC's classification for staging criteria. Also, the Bank will incorporate credit scoring or more forward looking elements in the future when information is more readily available. Upon the implementation of credit scoring system, it the risk level drops by two or more notches as compared to the risk level at origination, the accounts have to be classified under stage 2.

As for financial assets that are short term in nature, simplified approach will be adopted where no staging criteria is required. In this case, it will be either performing (stage1) or non-performing (stage 3).

Credit classification for financial assets

The Bank followed the mandatory loan classification and provisioning as required by the National Bank of Cambodia's Prakas No.B7-017-344 dated 1 December 2017 and Circular No. B7-018-001 Sor Ror Chor Nor dated 16 February 2018 on Credit Risk Grading and Impairment Provisioning. Loans and advances, other financial assets are classified into five classifications as described below:

	PAYMENT EXPERIENCED			
CLASSES/CRITERIA	As for facilities, which have an original term of more than one year	As for facilities that have an original term of one year or less		
1- NORMAL Timely repayment of an outstanding facility classified in this class is not in doubt. Repayment is steadily made according with the contractual terms and the facility does not exhibit any potential weakness in repayment capacity, business, cash flow and financial position of the counterparty.	- Punctual	- Punctual		

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

	PAYMENT EXPERIENCED			
CLASSES/ CRITERIA	As for facilities, which have an original term of more than one year	As for facilities that have an original term of one year or less		
2- SPECIAL MENTION A facility in this class is currently protected and may not be past due but it exhibits potential weaknesses that, if not corrected in a timely manner, may adversely affect repayment by the counterparty at a future date, and warrant close attention by the Bank. Examples of such weaknesses include, but are not limited to a declining trend in the operations of the counterparty or in its financial position, adverse economic and market conditions that all might affect its profitability and its future repayment capacity, or deteriorating conditions on the collateral. This class has clearly its own rational and should not be used as a compromise between Normal and Substandard.	 When any facility is past due from 30 days to 89 days. When interest payments for 30 to 89 days have been capitalized, refinanced, or rolled over into a new facility. 	 When any facility is past due for maximum 30 days. When interest payments for maximum 30 days have been capitalized, refinanced, or rolled over into a new facility. In case of overdrafts, excess of the approval limit is for maximum 30 days, or the current account has been inactive for maximum 30 days, or the net inflows on the current account have not been enough to cover capitalized interests for maximum 30 days. 		

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

	PAYMENT E	XPERIENCED
CLASSES/CRITERIA	As for facilities, which have an original term of more than one year	As for facilities that have an original term of one year or less
 3- SUB-STANDARD A facility in this class exhibits noticeable weakness and is not adequately protected by the current business or financial position of the counterparty and his repayment capacity. In essence, the primary source of repayment is not sufficient to service the debt and the Bank must look to secondary sources such as the realization of the collateral, in relation with the counterparty. Factors leading to a Substandard classification include: Inability of the counterparty to meet the contractual repayments' terms, Unfavourable economic and market conditions that would affect the business and profitability of the counterparty to generate enough cash flow to service the payments. Difficulties experienced by the counterparty in repaying other facilities granted by the bank or by other institutions when the information is available. 	 When any facility is past due from 90 days to 179 days. When interest payments for 90 to 179 days have been capitalized, refinanced, or rolled over into a new facility. 	 When any facility is past due for maximum 60 days. When interest payments for maximum 60 days have been capitalized, refinanced, or rolled over into a new facility. In case of overdrafts, excess of the approval limit is for maximum 60 days, or the current account has been inactive for maximum 60 days. The overdraft that has had no net inflow for 60 days must be modified into a term loan.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

Credit classification for financial assets (continued)

	PAYMENT EXPERIENCED		
CLASSES/CRITERIA	As for facilities, which have an original term of more than one year	As for facilities that have an original term of one year or less	
4- DOUBTFUL A facility classified in this category faces similar but more severe weaknesses than one classified as Substandard such that its full collection on the basis of existing facts, conditions or collateral value is highly questionable or improbable. The prospect of loss is high, even if the exact amount remains undetermined for now.	 When any facility is past due from 180 days to 359 days. When interest payment for 180 to 359 days have been capitalized or rolled over into a new facility. 	 When any facility is past due for maximum 90 days. When interest payment for maximum 90 days have been capitalized or rolled over into a new facility. In case of overdrafts, excess of the approval limit is for maximum 90 days, or the current account has been inactive for maximum 90 days. 	
5-LOSS A facility is classified Loss when it is not collectable, and little or nothing can be done to recover the outstanding amount from the counterparty.	 When any facility is past due from 360 days. When interest payment for 360 days or more have been capitalized or rolled over into a new facility. 	 When any facility is past due for maximum 180 days. When interest payment for maximum 180 days have been capitalized or rolled over into a new facility. In case of overdrafts, excess of the approval limit is for maximum 180 days, or the current account has been inactive for maximum 180 days. 	

With regard to facilities with repayments on a quarterly, semi-annual or longer basis, facilities must be classified as Substandard or worse depending on the situation of the counterparty as soon as a default occurs. For the purpose of the Table above, the default will be considered as having occurred 5 working days after the payment due date. The classification as substandard will be allowed only in case where the counterparty has clearly demonstrated that its inability to pay in due time is only temporary.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

Credit classification for financial assets (continued)

Facilities that are classified Substandard, Doubtful or Loss will be considered as "non-performing" facilities. Other facilities will be considered as "performing".

The following table sets out information about the credit quality of financial assets measured at amortised cost. Unless specifically indicated, for financial assets, the amounts in the table represent gross carrying amounts. For loan commitments and financial guarantee contracts, the amounts in the table represent the amounts committed or guaranteed, respectively.

	2020			2019	
Loans and advances at amortised cost	Stage 1: 12-month ECL	Stage 2: Lifetime ECL not credit impaired	Stage 3: Lifetime ECL credit impaired	Total	Total
	US\$	US\$	US\$	US\$	US\$
The Group					
Normal	4,372,663,965	-	2,598,060	4,375,262,025	3,828,981,539
Special mention	963	25,757,483	711,864	26,470,310	2,815,219
Substandard	-	-	32,985,705	32,985,705	8,860,402
Doubtful	-	-	50,125,889	50,125,889	9,084,696
Loss		-	21,799,236	21,799,236	29,721,718
	4,372,664,928	25,757,483	108,220,754	4,506,643,165	3,879,463,574
ECL allowance	(11,905,500)	(3,303,698)	(20,133,349)	(35,342,547)	(33,235,577)
Carrying amount	4,360,759,428	22,453,785	88,087,405	4,471,300,618	3,846,227,997
In KHR'000 equivalent (Note 4)	17,639,271,886	90,825,560	356,313,553	18,086,411,000	15,673,379,088
The Bank					
Normal	4,198,757,317	-	-	4,198,757,317	3,671,937,563
Special mention	963	23,944,531	-	23,945,494	2,163,641
Substandard	-	-	31,773,683	31,773,683	8,241,134
Doubtful	-	-	48,178,299	48,178,299	8,004,588
Loss			21,203,755	21,203,755	29,077,419
	4,198,758,280	23,944,531	101,155,737	4,323,858,548	3,719,424,345
ECL allowance	(10,839,155)	(2,906,941)	(17,463,293)	(31,209,389)	(32,189,580)
Carrying amount	4,187,919,125	21,037,590	83,692,444	4,292,649,159	3,687,234,765
In KHR'000 equivalent (Note 4)	16,940,132,861	85,097,052	338,535,936	17,363,765,848	15,025,481,666

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

		20	20		2019
Financial investments at amortised cost	Stage 1: 12-month ECL US\$	Stage 2: Lifetime ECL not credit impaired US\$	Stage 3: Lifetime ECL credit impaired US\$	Total US\$	Total US\$
The Group					
Normal	566,520,994	-	-	566,520,994	527,321,447
Special mention	-	-	-	-	-
Substandard	-	-	-	-	-
Doubtful	-	-	-	-	-
Loss	-	-	-	-	-
Total gross carrying amount	566,520,994	-	-	566,520,994	527,321,447
ECL allowance	-	-	-	-	-
Carrying amount – fair value	566,520,994			566,520,994	527,321,447
In KHR'000 equivalent (Note 4)	2,291,577,421			2,291,577,421	2,148,834,897
The Bank					
Normal	566,520,994	-	-	566,520,994	527,321,447
Special mention	-	-	-	-	-
Substandard	-	-	-	-	-
Doubtful	-	-	-	-	-
Loss	-	-	-	-	-
Total gross carrying amount	566,520,994	-	-	566,520,994	527,321,447
ECL allowance	-	-	-	-	-
Carrying amount – fair value	566,520,994			566,520,994	527,321,447
In KHR'000 equivalent (Note 4)	2,291,577,421	-	-	2,291,577,421	2,148,834,897

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

		202	0		2019
Cash and deposit and placement with other banks	Stage 1: 12-month ECL US\$	Stage 2: Lifetime ECL not credit impaired US\$	Stage 3: Lifetime ECL credit impaired US\$	Total US\$	Total US\$
The Group	· · ·				
Normal	1,308,371,649	-	-	1,308,371,649	1,597,183,824
Special Mention	-	-	-	-	-
Substandard	-	-	-	-	-
Doubtful	-	-	-	-	-
Loss	-	-	-	-	-
	1,308,371,649	-	-	1,308,371,649	1,597,183,824
ECL allowance	(582,444)	-	-	(582,444)	(589,956)
Carrying amount	1,307,789,205			1,307,789,205	1,596,593,868
In KHR'000 equivalent (Note 4)	5,290,007,334			5,290,007,334	6,506,120,012
The Bank					
Normal	1,265,340,832	-	-	1,265,340,832	1,552,809,189
Special Mention	-	-	-	-	-
Substandard	-	-	-	-	-
Doubtful	-	-	-	-	-
Loss	-	-	-	-	-
	1,265,340,832	-	-	1,265,340,832	1,552,809,189
ECL allowance	(141,543)	-	-	(141,543)	(45,241)
Carrying amount	1,265,199,289	-		1,265,199,289	1,552,763,948
In KHR'000 equivalent (Note 4)	5,117,731,124			5,117,731,124	6,327,513,088

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

		202	20		2019
Other Receivables	Stage 1: 12-month ECL US\$	Stage 2: Lifetime ECL not credit impaired US\$	Stage 3: Lifetime ECL credit impaired US\$	Total US\$	Total US\$
The Group					
Normal	6,921,852	-	-	6,921,852	5,918,866
Special mention	-	-	-	-	-
Substandard	-	-	-	-	-
Doubtful	-	-	-	-	-
Loss		-	-	-	-
	6,921,852	-	-	6,921,852	5,918,866
ECL allowance	(199,393)	-	-	(199,393)	(295,027)
Carrying amount	6,722,459			6,722,459	5,623,839
In KHR'000 equivalent (Note 4)	27,192,347			27,192,347	22,917,144
The Bank					
Normal	6,923,222	-	-	6,923,222	5,935,692
Special mention	-	-	-	-	-
Substandard	-	-	-	-	-
Doubtful	-	-	-	-	-
Loss	-	-	-	-	-
	6,923,222	-	-	6,923,222	5,935,692
ECL allowance	(197,045)	-	<u> </u>	(197,045)	(295,009)
Carrying amount	6,726,177	-		6,726,177	5,640,683
In KHR'000 equivalent (Note 4)	27,207,386			27,207,386	22,985,783

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(f) Credit quality of financial assets (continued)

		2020	D		2019
Financial guarantee contracts	Stage 1: 12-month ECL US\$	Stage 2: Lifetime ECL not credit impaired US\$	Stage 3: Lifetime ECL credit impaired US\$	Total US\$	Total US\$
The Group					
Normal	44,810,466	-	-	44,810,466	38,788,330
Special mention	-	-	-	-	-
Substandard	-	-	-	-	-
Doubtful	-	-	-	-	-
Loss	-		-	-	-
Total gross carrying amount	44,810,466	-	-	44,810,466	38,788,330
ELC allowance	(154,907)		-	(154,907)	(207,479)
Carrying amount – fair value	44,655,559	-		44,655,559	38,580,851
In KHR'000 equivalent (Note 4)	180,631,736			180,631,736	157,216,968
The Bank					
Normal	57,603,962	-	-	57,603,962	51,788,330
Special mention	-	-	-	-	-
Substandard	-	-	-	-	-
Doubtful	-	-	-	-	-
Loss				-	
Total gross carrying amount	57,603,962	-	-	57,603,962	51,788,330
ECL allowance	(525,324)			(525,324)	(655,822)
Carrying amount – fair value	57,078,638	-		57,078,638	51,132,508
In KHR'000 equivalent (Note 4)	230,883,091			230,883,091	208,364,970

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL

Significant increase in credit risk

The Bank considers that a significant increase in credit risk occurs no later than when an asset is more than or equal to 30 days past due for long-term facilities or more than or equal to 15 days past due for short-term facilities. Days past due are determined by counting the number of days since the earliest elapsed due date in respect of which full payment has not been received. Due dates are determined without considering any grace period that might be available to the borrower.

If there is evidence that there is no longer a significant increase in credit risk relative to initial recognition, then the loss allowance on an instrument returns to being measured as 12-month ECL. Some qualitative indicators of an increase in credit risk, such as delinquency, may be indicative of an increased risk of default that persists after the indicator itself has ceased to exist. In these cases, the Bank determines a probation period during which the financial asset is required to demonstrate good behaviour to provide evidence that its credit risk has declined sufficiently. When contractual terms of a loan have been modified, evidence that the criteria for recognising lifetime ECL are no longer met includes a history of up-to-date payment performance against the modified contractual terms.

The Bank monitors the effectiveness of the criteria used to identify significant increases in credit risk by regular reviews to confirm that:

- the criteria are capable of identifying significant increases in credit risk before an exposure is in default;
- the criteria do not align with the point in time when an asset becomes 30 or 15 days past due;
- the average time between the identification of a significant increase in credit risk and default appears reasonable;
- exposures are not generally transferred directly from 12-month ECL measurement to credit- impaired; and
- there is no unwarranted volatility in loss allowance from transfers between 12-month PD (Stage 1) and lifetime PD (Stage 2).

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Definition of default

The Bank considers a financial asset to be in default, aligning the NBC Prakas on Credit Risk Grading & Impairment Provisioning as stated in Article 17 and Article 19, when:

1) The default definition / NPL definition for long-term facilities where original tenure is more than a year as follow:

Day Past Due	Classification	Default Indicator
$0 \le \text{DPD} < 30$	Normal	Not Default / Derforming
$30 \le \text{DPD} < 90$	Special Mention	— Not Default / Performing
$90 \le \text{DPD} < 180$	Substandard	
$180 \le DPD < 360$	Doubtful	Default / Non-performing
$DPD \ge 360$	Loss	

2) The default definition / NPL definition for short-term facilities where original tenure is less than or equal to a year as follow:

Day Past Due	Classification	Default Indicator
$0 \le DPD \le 14$	Normal	
$15 \le \text{DPD} \le 30$	Special Mention	Not Default / Performing
$31 \le \text{DPD} \le 60$	Substandard	
$61 \le \text{DPD} \le 90$	Doubtful	Default / Non-performing
DPD ≥ 91	Loss	

3) In addition to the classification according to day past due information, the Bank also perform manual classification when there is a sign of deterioration in the credit profile, the Bank might classify the loan into substandard, doubtful or loss even though the DPD is less than 90 days for long term and less than 30 days for short term.

Incorporation of forward-looking information

The Group incorporates forward-looking information into both the assessment of whether the credit risk of an instrument has increased significantly since its initial recognition and the measurement of ECL.

The Group formulates three economic scenarios: a base case, which is the median scenario assigned a 55% probability of occurring, and two less likely scenarios, 20% for one upside and 25% for one downside, each assigned a 20% probability of occurring. The base case is aligned with information used by the Group for other purposes such as strategic planning and budgeting.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Incorporation of forward-looking information (continued)

External information considered includes economic data and forecasts published by governmental bodies and monetary authorities in the countries where the Group operates, supranational organisations such as the International Monetary Fund, and selected private-sector and academic forecasters.

The Group has identified and documented key drivers of credit risk and credit losses for each portfolio of financial instruments in accordance with each country and, using an analysis of historical data, has estimated relationships between macro-economic variables and credit risk and credit losses.

The economic scenarios of the Bank's portfolio used as at 31 December 2020 included the following key indicators for Cambodia for the years ending 31 December 2019 to 2022:

Exposure	2018	2019	2020	2021	2022
1- Small Loan					
- Domestic Private Sector Credit to GDP (%)					
Base	62.08%	63.76%	64.37%	50.87%	50.87%
Upside	35.79%	37.46%	38.07%	24.57%	24.57%
Downside	88.38%	90.06%	90.67%	77.17%	77.17%
- FDI (% of GDP)					
Base	10.69%	10.62%	10.68%	11.20%	11.20%
Upside	13.35%	13.28%	13.34%	13.86%	13.86%
Downside	8.03%	7.96%	8.02%	8.54%	8.54%
2- Medium Loan					
- Cambodia Commodity Imports Total Import	ts (in KHR billion)				
Base	4,311	4,337	4,337	3,263	3,263
Upside	2,835	2,862	2,862	1,788	1,788
Downside	5,787	5,813	5,813	4,739	4,739
- Nominal GDP (in KHR billions)					
Base	9.45%	9.40%	9.40%	9.52%	9.52%
Upside	12.97%	12.92%	12.91%	13.04%	13.04%
Downside	5.94%	5.89%	5.88%	6.01%	6.01%
3- Revolving					
- US 1 Year Treasury Yield Curve Rates					
Base	0.96743				
Upside	(0.37254)				
Downside	2.30741				
- Current account balance/GDP					
Base	0.17000				
Upside	14.24917				
Downside	(13.90917)				

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Incorporation of forward-looking information (continued)

Exposure	2018	2019	2020	2021	2022
4- Trade Loan				·	
- FDI Net Inflow (USD)					
Base	1,956,347,705				
Upside	2,435,773,490				
Downside	1,476,921,919				
- Nominal GDP (in KHR billions)					
Base	74,100				
Upside	92,739				
Downside	55,460				
5- Credit Card					
- Interest rate fixed deposit 12 months (9					
Base	-11.92%	-11.90%	-11.79%	1.20%	1.20%
Upside	4.55%	4.57%	4.67%	17.66%	17.66%
Downside	-28.38%	-28.36%	-28.25%	-15.26%	-15.26%
- Domestic Private Sector Credit to GDF	P (%)				
Base	62.08%	63.76%	64.37%	48.90%	48.90%
Upside	35.50%	37.17%	37.78%	22.31%	22.31%
Downside	88.67%	90.35%	90.96%	75.49%	75.49%
6- Personal Loan & Other					
- GDP at Current Price, Industry (YOY,%					
Base	17.12%	17.40%	17.41%	15.88%	15.88%
Upside	21.42%	21.69%	21.70%	20.18%	20.18%
Downside	12.82%	13.10%	13.11%	11.59%	11.59%
- Interest rate fixed deposit 12 months (%					
Base	1.39%	1.53%	1.40%	0.79%	0.79%
Upside	8.98%	9.13%	8.99%	8.39%	8.39%
Downside	-6.21%	-6.07%	-6.20%	-6.81%	-6.81%
- Total Unemployment Cambodia (ILO E					
Base	5.19%	1.41%	4.35%	9.18%	9.18%
Upside	-85.63%	-89.41%	-86.47%	-81.64%	-81.64%
Downside	96.01%	92.23%	95.16%	100.00%	100.00%
7- Home Improvement Loan					
 Current account balance/GDP 					
Base	-8.01%	-8.00%	-7.97%	-1.05%	-1.05%
Upside	12.23%	12.24%	12.28%	19.19%	19.19%
Downside	-28.26%	-28.24%	-28.21%	-21.30%	-21.30%
- Nominal GDP (in KHR billions)					
Base	9.45%	9.40%	9.40%	9.82%	9.82%
Upside	13.75%	13.70%	13.69%	14.11%	14.11%
Downside	5.16%	5.11%	5.10%	5.53%	5.53%

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Incorporation of forward-looking information (continued)

Exposure	2018	2019	2020	2021	2022
8- Overdraft					
- Crude Oil Brent (USD)					
Base	21.61%				
Upside	-31.67%				
Downside	74.90%				
- Interest rate fixed deposit 12 m	nonths (%)				
Base	-0.60%				
Upside	7.21%				
Downside	-8.41%				
- Interest rate loans 12 months ((%)				
Base	-19.87%				
Upside	-67.51%				
Downside	27.76%				
9- Staff Loan					
- US 1 Year Treasury Yield Cur					
Base	1.448000	1.493200	1.514680	0.231905	0.231905
Upside	1.138767	1.183967	1.205447	(0.077328)	(0.077328)
Downside	1.757233	1.802433	1.823913	0.541137	0.541137
10- Public Housing Loan					
- GDP at Current Price, Industry	· · /				
Base	16.59%	16.48%	16.36%	15.88%	15.88%
Upside	20.89%	20.77%	20.65%	20.18%	20.18%
Downside	12.29%	12.18%	12.06%	11.59%	11.59%
- Crude Oil Brent (USD)					
Base	21.61%	23.81%	24.38%	-12.39%	-12.39%
Upside	-30.02%	-27.82%	-27.25%	-64.02%	-64.02%
Downside	73.24%	75.45%	76.01%	39.24%	39.24%
- Total Unemployment Cambod	· · · ·				
Base	3.33%	6.56%	6.73%	9.18%	9.18%
Upside	-87.49%	-84.26%	-84.09%	-81.64%	-81.64%
Downside	94.15%	97.38%	97.55%	100.00%	100.00%
11- Staff Housing Loan					
- USDKHR BGN Currency					
Base	4,072.57036	4,079.59914	4,085.50377	4,050.81903	4,050.81903
Upside	3,995.78516	4,002.81395	4,008.71857	3,974.03384	3,974.03384
Downside	4,149.35556	4,156.38434	4,162.28896	4,127.60423	4,127.60423
- FDI (% of GDP)	40.000/	40.000/	40.000/	44.0407	44.040/
Base	10.69%	10.62%	10.68%	11.24%	11.24%
Upside	13.34%	13.27%	13.33%	13.89%	13.89%
Downside	8.04%	7.97%	8.03%	8.59%	8.59%

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Incorporation of forward-looking information (continued)

Exposure	2018	2019	2020	2021	2022
12- Guarantee					
- Domestic Private Sector Credit to GDF	P (%)				
Base	62.08%				
Upside	35.79%				
Downside	88.38%				
- FDI (% of GDP)					
Base	10.69%				
Upside	13.35%				
Downside	8.03%				
13- Import Loan					
- FDI Net Inflow (USD)					
Base	1,956,347,704.70				
Upside	2,435,773,490.17				
Downside	1,476,921,919.23				
- Nominal GDP (in KHR billions)					
Base	74,099.53				
Upside	92,739.47				
Downside	55,459.58				

Predicted relationships between the key indicators and default and loss rates on various portfolios of financial assets have been developed based on analysing available historical data over the past 7 years.

Modified financial assets

The contractual terms of a loan may be modified for a number of reasons, including changing market conditions, customer retention and other factors not related to a current or potential credit deterioration of the customer. An existing loan whose terms have been modified may be derecognised and the renegotiated loan recognised as a new loan at fair value in accordance with the accounting policy set out in Note 2(f)(iv).

When the terms of a financial asset are modified and the modification does not result in derecognition, the determination of whether the asset's credit risk has increased significantly reflects comparison of:

- its remaining lifetime PD at the reporting date based on the modified terms; with
- the remaining lifetime PD estimated based on data on initial recognition and the original contractual terms.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Modified financial assets (continued)

When modification results in derecognition, a new loan is recognised and allocated to Stage 1 (assuming it is not credit-impaired at that time).

The revised terms usually include extending the maturity, changing the timing of interest payments and amending the terms of loan covenants.

Loss allowance

During the year, the allowance for/(reversal of) impairment loss recognised on the profit or loss were as follows:

	The Group				The Bank			
Туре	2020	2019	2020	2019	2020	2019	2020	2019
	US\$	US\$	KHR'000	KHR'000	US\$	US\$	KHR'000	KHR'000
			(Note 4)	(Note 4)			(Note 4)	(Note 4)
Deposit and placements with banks	(7,786)	523,753	(31,744)	2,122,247	96,083	31,153	391,730	126,232
Loans and advances to customers	20,852,357	22,600,278	85,015,059	91,576,326	16,204,462	21,462,295	66,065,592	86,965,219
Other assets	(50,540)	287,174	(206,051)	1,163,630	(52,869)	287,184	(215,547)	1,163,670
	20,794,031	23,411,205	84,777,264	94,862,203	16,247,676	21,780,632	66,241,775	88,255,121
Financial guarantee contracts	(54,156)	(87,989)	(220,794)	(356,531)	(132,082)	360,354	(538,498)	1,460,154
Total	20,739,875	23,323,216	84,556,470	94,505,672	16,115,594	22,140,986	65,703,277	89,715,275

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Loss allowance (continued)

The following tables show balance of the loss allowance by class of financial instrument:

	2020				2019			
Loans and advances at amortised cost	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
	US\$	US\$	US\$	US\$	US\$	US\$	US\$	US\$
The Group								
As at 1 January	24,627,422	344,453	8,263,701	33,235,576	14,976,248	862,530	18,061,054	33,899,832
Allowance for impairment loss during the year	(12,721,922)	2,959,245	30,615,034	20,852,357	9,651,174	(518,077)	13,467,181	22,600,278
Written off during the year	-	-	(18,676,459)	(18,676,459)	-	-	(23,994,329)	(23,994,329)
Currency translation difference			(68,927)	(68,927)			729,796	729,796
At 31 December	11,905,500	3,303,698	20,133,349	35,342,547	24,627,422	344,453	8,263,702	33,235,577
In KHR'000 equivalent (Note 4)	48,157,748	13,363,458	81,439,397	142,960,602	100,356,745	1,403,646	33,674,586	135,434,977

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Loss allowance (continued)

The following tables show balance of the loss allowance by class of financial instrument: (continued)

		2020)		2019			
Loans and advances at amortised cost	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
	US\$	US\$	US\$	US\$	US\$	US\$	US\$	US\$
The Bank								
As at 1 January	24,066,137	286,202	7,837,241	32,189,580	14,137,285	818,920	17,600,970	32,557,175
Allowance for impairment loss during the year	(13,226,982)	2,620,739	26,810,704	16,204,462	9,928,852	(532,718)	12,066,161	21,462,295
Written off during the year	-	-	(17,158,054)	(17,158,054)	-	-	(22,436,319)	(22,436,319)
Currency translation difference	-	-	(26,599)	(26,599)			606,429	606,429
At 31 December	10,839,155	2,906,941	17,463,293	31,209,389	24,066,137	286,202	7,837,241	32,189,580
In KHR'000 equivalent (Note 4)	43,844,382	11,758,576	70,639,020	126,241,978	98,069,508	1,166,273	31,936,757	131,172,538

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Measurement of ECL (continued)

Loss allowance (continued)

The following tables show balance of the loss allowance by class of financial instrument: (continued)

Stage 1	Store 2	-		
US\$	Stage 2 US\$	Stage 3 US\$	Total US\$	Total US\$
589,956	-	-	589,956	69,999
(7,786)	-	-	(7,786)	523,753
274	-	-	274	(3,796)
582,444	-	-	582,444	589,956
2,355,986			2,355,986	2,404,071
45,241	-	-	45,241	14,059
96,083	-	-	96,083	31,153
219	-	-	219	29
141,543	-	-	141,543	45,241
572,541	-		572,541	184,357
	589,956 (7,786) 274 582,444 2,355,986 45,241 96,083 219 141,543	589,956 - (7,786) - 274 - 582,444 - 2,355,986 - 45,241 - 96,083 - 219 - 141,543 -	589,956 - - (7,786) - - 274 - - 582,444 - - 2,355,986 - - 45,241 - - 96,083 - - 219 - - 141,543 - -	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$

	2020						
Other assets - other receivables	Stage 1 US\$	Stage 2 US\$	Stage 3 US\$	Total US\$	Total US\$		
The Group	· · · · · · · · · · · · · · · · · · ·				<u> </u>		
At 1 January	295,027	-	-	295,027	7,858		
Loss allowance during the year	(50,540)	-	-	(50,540)	287,174		
Currency translation difference	(45,094)	-	-	(45,094)	(5)		
At 31 December	199,393	-	-	199,393	295,027		
In KHR'000 equivalent (Note 4)	806,545			806,545	1,202,235		
The Bank							
At 1 January	295,009	-	-	295,009	7,830		
Loss allowance during the year	(52,869)	-	-	(52,869)	287,184		
Currency translation difference	(45,095)	-	-	(45,095)	(5)		
At 31 December	197,045	-	-	197,045	295,009		
In KHR'000 equivalent (Note 4)	797,047		<u> </u>	797,047	1,202,162		

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(g) Amounts arising from ECL (continued)

Measurement of ECL (continued)

Loss allowance (continued)

		202	20		2019
Financial guarantee contracts	Stage 1 US\$	Stage 2 US\$	Stage 3 US\$	Total US\$	Total US\$
The Group					
At 1 January	207,479	-	-	207,479	288,498
Reversal of allowance for impairment loss during the year	(54,156)	-	-	(54,156)	(87,989)
Currency translation difference	1,584			1,584	6,970
At 31 December	154,907	-	-	154,907	207,479
In KHR'000 equivalent (Note 4)	626,599			626,599	845,476
The Bank					
At 1 January	655,822	-	-	655,822	288,498
Loss allowance during the year	(132,082)	-	-	(132,082)	360,354
Currency translation difference	1,584			1,584	6,970
At 31 December	525,324	-	-	525,324	655,822
In KHR'000 equivalent (Note 4)	2,124,936			2,124,936	2,672,474

(h) COVID-19 Outbreak and Impact on ECL

The COVID-19 outbreak on the economic growth resulting the economic variables that are used in the models are out of the bounds for which CIFRS 9 models have been built and recalibrated to operate. Furthermore, the current government support programs and regulatory on loan restructuring, designed to mitigate the adverse impact of COVID-19 and related economic consequences, have partially been factored into the modelling. This results CIFRS 9 models under the current economic conditions could not measure the accurate outcomes. Hence, the post-model overlays based on a sensitive analysis and ACLEDA Bank's senior management's judgment are necessary to reflect ECL in a way to avoid underestimation or overestimation in these conditions.

Models will be recalibrated over time in order to overcome observed impacts of Covid-19. Therefore, we anticipate significant post-model adjustments over 2020 and for the foreseeable future when the economy resumes positive GDP growth.

The Group and the Bank also perform the identification and periodic review of customers experiencing increases in credit risk and credit impairment, particularly where those customers have accepted payment deferrals and other reliefs designed to address short-term liquidity issues, or have extended those deferrals, given limitations in the available credit information on these customers.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.1 Credit risk (continued)

(h) COVID-19 Outbreak and Impact on ECL (continued)

Economic forecasts are subject to high degree of uncertainty in the current environment. This have resulted the forecasts and economic models may not be applicable. This requires a greater reliance on the forecast by the National Bank of Cambodia, Ministry of Economics and Finance, World Bank, or Asia Development Bank to incorporate into the analysis and assessment of ECL outcomes.

The Group and the Bank also generate three economic scenarios to reflect economic conditions, starting with baseline, good, and bad. Each scenario is consistent with a probability of 55%, 20% and 25%, according to the decision of ACLEDA Bank's senior management since COVID-19 outbreak in Mar-2020.

35.2 Market risk

The Group and the Bank take on exposure to market risk, which is the risk of changes in the level or volatility of market rates or prices such as interest rates, credit spreads, foreign currency exchange rates, commodity prices and equity prices that could adversely affect the Group's and the Bank's future earnings, capital, or ability to meet business objectives.

The primary categories of market risk for the Group and the Bank are:

- (i) Interest rate risk: can lead to losses when there is an imbalance between assets and liabilities on which interest rates change periodically or at different intervals.
- (ii) Foreign exchange rate risk: can lead to losses when there is an imbalance between assets and liabilities in any particular currency.

The Board Risk Management and IT Committee ("BRIC") is established by the board of directors to assist the Board in the effective discharge of its responsibilities for risk management and to regularly review management's ability to assess and manage the Bank's risks. The market risk is managed based on the following principles and internal targets.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

Principles of the market risk:

- In line with sound banking principles the Group and the Bank will actively manage currencies and interest rate risk positions to hedge positions by matching assets and liabilities.
- The Group and the Bank shall not engage in activities to derive income from proprietary trading or speculation on the movements of exchange rates, interest rates or value of securities.
- The position limits as set by the central banks are meant to limit the adverse impact of market risk and are not meant to create an opportunity for proprietary trading.
- The day to day responsibility for market risk lies with the senior management of the treasury group.

Internal targets of the market risk:

- The regulatory limits on foreign exchange currency mismatch per currency and cumulative should be observed at all times.
- The Bank will have, at all times, internal targets that are lower than the regulatory limits to allow for a safety margin to ensure permanent full compliance with regulatory limits.
- Setting the level of the internal targets is at the discretion of the Assets and Liabilities Committee ("ALCO") and needs to be both 1) stated and motivated in the ALCO minutes and 2) formally approved by the President & Group Managing Director.

Internal targets of the market risk: (continued)

- Relevant divisions and departments should regularly assess and monitor the perceived risks of noncompliance to the targets. Any breaches of internal targets should be reported to the ALCO and President & Group Managing Directors.
- Any change in level of internal targets will need to be reported by e-mail to the Chair of the Board Risk Management and IT Committee ("BRIC") on the same day the change has been made.
- At all time, the Bank will have a contingency plan to be executed when it is perceived by the President & Group Managing Director that the safety margin may not be sufficient and there is a risk that the regulatory limit on foreign exchange currency mismatch could be reached. Such contingency plan should be sufficient to ensure that the regulatory limits on foreign exchange currency mismatch will not be breached.

As of 31 December 2020 and 31 December 2019, the Group and the Bank did not have financial instruments carried at fair value. The Group uses derivative financial instruments such as foreign exchange contract and interest rate swaps to hold its risk exposures.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

(i) Interest rate risk

Cash flow interest rate risk is the risk that the future cash flows of a financial instrument will fluctuate because of the changes in market interest rates. Fair value interest rate risk is the risk that the value of a financial instrument will fluctuate because of the changes in the market interest rates. Interest margins may increase as a result of changes but may reduce losses in the event that unexpected movements arise.

The management of the Group and the Bank at this stage does not have a policy to set limits on the level of mismatch of interest rate repricing that may be undertaken; however, the management regularly monitors the mismatch.

The Group's and the Bank's interest rate risk arise from borrowings. Borrowings issued at variable rates expose the Group and the Bank to cash flow interest rate risk. The Group and the Bank manage cash flow interest rate risk by using floating-to-fixed interest rate swaps. Such interest rate swaps have the economic effect of converting borrowings from floating rates to fixed rates and recognising the interest expense based on that fixed interest rate. The Group and the Bank raise borrowings at floating rates and swaps them into fixed rate that are lower than those available if the Group and the Bank borrowed at fixed rates directly. Under the interest rate swaps, the Group agreed with other parties to exchange, at specified intervals (primarily semi-annually), the difference between fixed contract rates and floating rate interest amounts calculated by reference to the agreed notional amounts.

The table below summarises the Group's and the Bank's exposure to interest rate risks. It includes the financial instruments at carrying amounts, categorised by the earlier of contractual repricing or maturity dates.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

(i) Interest rate risk (continued)

				The Group			
	Up to 1 month US\$	1-3 months US\$	3-12 months US\$	1-5 years US\$	Over 5 years US\$	Non-interest bearing US\$	Total US\$
As at 31 December 2020							
Financial assets							
Cash on hand	-	-	-	-	-	412,759,051	412,759,051
Deposits and placements with other banks	234,738,355	4,076,310	-	-	-	295,838,481	534,653,146
Financial investments	566,138,442	-	372,497	-	-	163,584	566,674,523
Loans and advances							
- Performing	114,672,830	239,865,582	845,044,589	2,744,589,864	454,249,545	-	4,398,422,410
- Non performing	-	-	-	-	-	108,220,753	108,220,753
- Loss allowance	-	-	-	-	-	(35,342,545)	(35,342,545)
Other assets	-	-	-	-	-	6,921,852	6,921,852
Total financial assets	915,549,627	243,941,892	845,417,086	2,744,589,864	454,249,545	788,561,176	5,992,309,190
Financial liabilities							
Deposits and placements of other banks and financial institutions	68,526,232	8,347,174	40,716,070	18,855,000	71,556,029	109,008,954	317,009,459
Deposits from customers	1,998,279,203	254,562,597	923,043,532	532,634,286	21,296,683	564,469,747	4,294,286,048
Other liabilities	-	-	-	-	-	28,699,228	28,699,228
Lease liabilities	1,722,414	1,483,344	7,104,107	16,334,766	1,973,271	-	28,617,902
Borrowings	1,784,756	74,857,377	121,085,450	332,042,951	5,860,858	6,767,524	542,398,916
Subordinated debts	-	-	10,973,591	98,753,000	56,997,210	434,822	167,158,623
Total financial liabilities	2,070,312,605	339,250,492	1,102,922,750	998,620,003	157,684,051	709,380,275	5,378,170,176
Net interest sensitivity gap	(1,154,762,978)	(95,308,600)	(257,505,664)	1,745,969,861	296,565,494	79,180,901	614,139,014
In KHR'000 equivalent (Note 4)	(4,671,016,246)	(385,523,287)	(1,041,610,411)	7,062,448,088	1,199,607,423	320,286,745	2,484,192,312
Unused portion of overdrafts	-	-	-	-	-	120,937,607	120,937,607
Guarantees, acceptances and other financial facilities	-	-	-	-	-	54,900,984	54,900,984
Net interest sensitivity gap	-	-	-	-	-	175,838,591	175,838,591
In KHR'000 equivalent (Note 4)	-	-	-	-	-	711,267,100	711,267,100
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NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

(i) Interest rate risk (continued)

				The Group			
	Up to 1	1-3	3-12	1-5	Over 5	Non-interest	
	month US\$	months US\$	months US\$	years US\$	years US\$	bearing US\$	Total US\$
As at 31 December 2019							
Financial assets							
Cash on hand	-	-	-	-	-	421,527,238	421,527,238
Deposits and placements with other banks	101,015,402	1,127,269	-	-	-	485,587,860	587,730,531
Financial investments	177,298,469	330,089,942	19,933,035	-	-	153,530	527,474,976
Loans and advances							
- Performing	113,123,281	228,380,504	767,798,648	2,417,544,191	305,180,685	-	3,832,027,309
- Non performing	-	-	-	-	-	48,075,664	48,075,664
- Loss allowance ^(*)	-	-	-	-	-	(34,082,454)	(34,082,454)
Other assets		-		-	-	5,918,866	5,918,866
Total financial assets	391,437,152	559,597,715	787,731,683	2,417,544,191	305,180,685	927,180,704	5,388,672,130
Financial liabilities							
Deposits and placements of other banks and financial institutions	69,219,725	9,732,929	16,835,620	15,794,271	70,150,000	103,442,600	285,175,145
Deposits from customers	1,906,967,792	270,961,829	983,609,388	400,528,294	15,795,723	504,859,827	4,082,722,853
Other liabilities	-	-	-	-	-	27,251,397	27,251,397
Lease liabilities	1,058,400	1,354,080	7,343,514	18,337,639	2,822,306	-	30,915,939
Borrowings	26,053,241	33,059,455	134,562,903	367,062,751	4,233,351	-	564,971,701
Subordinated debts	-	-	81,243,447	25,964,271	32,094,862	-	139,302,580
Total financial liabilities	2,003,299,158	315,108,293	1,223,594,872	827,687,226	125,096,242	635,553,824	5,130,339,615
Net interest sensitivity gap	(1,611,862,006)	244,489,422	(435,863,189)	1,589,856,965	180,084,443	291,626,880	258,332,515
In KHR'000 equivalent (Note 4)	(6,568,337,674)	996,294,395	(1,776,142,495)	6,478,667,132	733,844,105	1,188,379,536	1,052,704,999
Unused portion of overdrafts						93,060,063	93,060,063
Guarantees, acceptances and other financial facilities	-	-	-	-	-	47,380,747	47,380,747
Net interest sensitivity gap						140,440,810	140,440,810
In KHR'000 equivalent (Note 4)					-		
				<u> </u>	-	572,296,301	572,296,301

(*) Included provision for off balance sheet commitment.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)35.2 Market risk (continued)

(i) Interest rate risk (continued)

				The Bank			
	Up to 1	1-3	3-12	1-5	Over 5	Non-interest	
	month US\$	months US\$	months US\$	years US\$	years US\$	bearing US\$	Total US\$
As at 31 December 2020	· · · · · · · · · · · · · · · · · · ·						· · · · ·
Financial assets							
Cash on hand	-	-	-	-	-	400,816,126	400,816,126
Deposits and placements with other banks	234,700,199	3,000,000	-	-	-	269,929,208	507,629,407
Financial investments	566,138,442	-	372,497	-	-	163,584	566,674,523
Loans and advances							
- Performing	105,939,266	220,918,625	787,952,910	2,656,562,739	451,329,271	-	4,222,702,811
- Non performing	-	-	-	-	-	101,155,737	101,155,737
- Loss allowance	-	-	-	-	-	(31,209,389)	(31,209,389)
Other assets	-	-	-	-	-	6,923,222	6,923,222
Total financial assets	906,777,907	223,918,625	788,325,407	2,656,562,739	451,329,271	747,778,488	5,774,692,437
Financial liabilities							
Deposits and placements of other banks and financial institutions	67,683,651	6,356,000	22,429,557	18,855,000	71,556,029	109,884,317	296,764,554
Deposits from customers	1,955,317,026	246,232,704	896,537,310	511,760,130	17,564,763	552,856,804	4,180,268,737
Other liabilities	-	-	-	-	-	28,488,959	28,488,959
Lease liabilities	1,620,943	1,443,572	6,647,364	15,123,119	937,387	-	25,772,385
Borrowings	193,560	71,157,818	107,238,207	318,846,331	3,753,850	6,163,150	507,352,916
Subordinated debts	-	-	10,973,591	98,753,000	56,997,210	434,822	167,158,623
Total financial liabilities	2,024,815,180	325,190,094	1,043,826,029	963,337,580	150,809,239	697,828,052	5,205,806,174
Net interest sensitivity gap	(1,118,037,273)	(101,271,469)	(255,500,622)	1,693,225,159	300,520,032	49,950,436	568,886,263
In KHR'000 equivalent (Note 4)	(4,522,460,769)	(409,643,092)	(1,033,500,016)	6,849,095,768	1,215,603,529	202,049,515	2,301,144,935
Unused portion of overdrafts		_	_	_	-	120,108,962	120,108,962
Guarantees, acceptances and other financial facilities	-	-	-	-	-	54,694,480	54,694,480
Net interest sensitivity gap		-	-		-	174,803,442	174,803,442
In KHR'000 equivalent (Note 4)	-		-		-	707,079,923	707,079,923

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

(i) Interest rate risk (continued)

				The Bank			
	Up to 1	1-3	3-12	1-5	Over 5	Non-interest	
	month US\$	months US\$	months US\$	years US\$	years US\$	bearing US\$	Total US\$
As at 31 December 2019							
Financial assets							
Cash on hand	-	-	-	-	-	410,955,867	410,955,867
Deposits and placements with other banks	100,430,774	-	-	-	-	458,181,566	558,612,340
Financial investments	177,298,469	330,089,942	19,933,035	-	-	153,530	527,474,976
Loans and advances							
- Performing	104,137,506	210,501,398	713,611,636	2,339,892,203	305,551,912	-	3,673,694,655
- Non performing	-	-	-	-	-	45,729,690	45,729,690
- Loss allowance ^(*)	-	-	-	-	-	(32,845,402)	(32,845,402)
Other assets	<u> </u>	-	<u> </u>	-	-	5,935,692	5,935,692
Total financial assets	381,866,749	540,591,340	733,544,671	2,339,892,203	305,551,912	888,110,943	5,189,557,818
Financial liabilities							
Deposits and placements of other banks and financial institutions	67,367,305	7,631,767	6,405,050	14,050,000	70,150,000	108.673.599	274,277,721
Deposits from customers	1,875,484,798	265,335,713	960,119,470	376,717,663	11,928,271	492,560,644	3,982,146,559
Other liabilities	-	-	-	-	-	26,115,905	26,115,905
Lease liabilities	1,001,066	1,336,787	6,685,580	16,988,942	1,776,793	-	27,789,168
Borrowings	25,698,680	28,185,890	122,807,911	341,375,647	-	-	518,068,128
Subordinated debts	-	-	81,243,447	25,964,271	32,094,862	-	139,302,580
Total financial liabilities	1,969,551,849	302,490,157	1,177,261,458	775,096,523	115,949,926	627,350,148	4,967,700,061
Net interest sensitivity gap	(1,587,685,100)	238,101,183	(443,716,787)	1,564,795,680	189,601,986	260,760,795	221,857,757
In KHR'000 equivalent (Note 4)	(6,469,816,783)	970,262,321	(1,808,145,907)	6,376,542,396	772,628,093	1,062,600,240	904,070,360
Unused portion of overdrafts	-	-	-	-	-	93,060,063	93,060,063
Guarantees, acceptances and other financial facilities	-	-	-	-	-	47,353,943	47,353,943
Net interest sensitivity gap	-	-	-	-	-	140,414,006	140,414,006
In KHR'000 equivalent (Note 4)		-	-		-	572,187,074	572,187,074
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(*) Included provision for off balance sheet commitment.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

(i) Interest rate risk (continued)

Fair value sensitivity analysis for fixed-rate instruments

The Group and the Bank do not account for any fixed-rate financial assets or financial liabilities at fair value through profit or loss. Therefore, a change in interest rates at the reporting date would not affect statement of profit or loss.

Cash flow sensitivity analysis for variable-rate instruments

Statement of profit or loss is sensitive to higher/lower interest expenses from borrowings as a result of changes in interest rates. The change of 25 basis points ("bp") in interest rates of borrowings at the reporting date would not have material effect on statement of profit or loss of the Group and the Bank.

(ii) Foreign exchange risk

The Group operates in Cambodia, Lao PDR, and Republic of the Union of Myanmar and transacts in many currencies. It is exposed to various currency risks, primarily with respect to Khmer Riel, Euro, Thai Baht, LAK, JPY, AUD, VND, CAD, Kyat and others.

Foreign exchange risk arises from future commercial transactions and recognised assets and liabilities denominated in a currency that is not the Group's and the Bank's functional currency.

Management monitors their foreign exchange risk against functional currencies. To manage their foreign exchange risk arising from future commercial transactions and recognised assets and liabilities, the Group use forward contracts.

The table below summarises the Group's and the Bank's exposure to foreign currency exchange rate risk at 31 December 2020 and 31 December 2019. Included in the table are the financial instruments at carrying amount by currency in US\$ equivalent.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

	The Group								
				In US\$ equi	valent				
	KHR	USD	THB	EUR	AUD	LAK	Others	Total	
As at 31 December 2020									
Financial assets									
Cash on hand	103,488,247	284,892,098	12,247,160	2,967,502	226,620	7,446,734	1,490,690	412,759,051	
Deposits and placements with other banks	78,882,898	431,103,914	4,323,331	1,200,340	78,488	15,945,738	3,118,437	534,653,146	
Financial investments	32,362,619	534,311,904	-	-	-	-	-	566,674,523	
Loans and advances	605,355,296	3,653,522,729	27,594,434	-	-	140,856,509	43,971,650	4,471,300,618	
Other assets	112,607	6,661,885	23,341		-	124,019	-	6,921,852	
Total financial assets	820,201,667	4,910,492,530	44,188,266	4,167,842	305,108	164,373,000	48,580,777	5,992,309,190	
Energial Bala String									
Financial liabilities	04 000 050	000 004 404	070 404			04 000 004		047.000.450	
Deposits and placements of other banks and financial institutions	34,696,856	260,231,181	272,131	-	-	21,809,291	-	317,009,459	
Deposits from customers	731,620,195	3,415,853,729	39,841,991	3,824,001	-	94,515,122	8,631,010	4,294,286,048	
Other liabilities	1,156,153	27,287,797	34,800	112,286	-	96,196	11,996	28,699,228	
Lease liabilities	-	27,913,335	141,356	-	-	410,237	152,974	28,617,902	
Borrowings	40,101,721	477,440,120	-	-	-	10,910,412	13,946,663	542,398,916	
Subordinated debts		167,158,623		-	-	-	-	167,158,623	
Total financial liabilities	807,574,925	4,375,884,785	40,290,278	3,936,287		127,741,258	22,742,643	5,378,170,176	
Net on-balance sheet position	12,626,742	534,607,745	3,897,988	231,555	305,108	36,631,742	25,838,134	614,139,014	
In KHR'000 equivalent (Note 4)	51,075,171	2,162,488,329	15,767,361	936,640	1,234,162	148,175,396	104,515,253	2,484,192,312	
	0.004 747		4 074 0 40			000.045		400 007 007	
Unused portion of overdrafts	2,331,747	116,705,275	1,071,940	-	-	828,645	-	120,937,607	
Guarantees, acceptances and other financial facilities	5,551,196	45,784,145	2,810,817	349,515	-	205,141	200,170	54,900,984	
Credit commitment	7,882,943	162,489,420	3,882,757	349,515		1,033,786	200,170	175,838,591	
In KHR'000 equivalent (Note 4)	31,886,504	657,269,704	15,705,752	1,413,788		4,181,664	809,688	711,267,100	
$\frac{1}{1}$	51,000,004	007,209,704	13,703,732	1,413,700		4,101,004	009,000	711,207,100	

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

				The Gr				
				In US\$ eq			•	
	KHR	USD	THB	EUR	AUD	LAK	Others	Total
As at 31 December 2019								
Financial assets	70 000 000	000 440 504	0.000.440	4 007 004	050.004	0.050.000	4 550 000	404 507 000
Cash on hand	73,832,938	328,112,584	9,820,413	1,697,804	259,264	6,253,302	1,550,933	421,527,238
Deposits and placements with other banks	134,547,685	425,145,989	9,133,078	2,857,189	-	14,830,882	1,215,708	587,730,531
Financial investments	49,132	527,425,844	-	-	-	-	-	527,474,976
Loans and advances	490,616,838	3,163,835,145	27,858,301	-	-	127,201,433	36,508,802	3,846,020,519
Other assets	137,705	5,729,950	2,418	-	<u> </u>	48,793	-	5,918,866
Total financial assets	699,184,298	4,450,249,512	46,814,210	4,554,993	259,264	148,334,410	39,275,443	5,388,672,130
Financial liabilities								
Deposits and placements of other banks and financial institutions	28,342,365	240,639,132	371,838	-	-	15,821,810	-	285,175,145
Deposits from customers	592,801,497	3,358,536,818	41,962,783	4,009,451	96	79,724,173	5,688,035	4,082,722,853
Other liabilities	3,647,241	21,854,120	609,168	1,022,705	-	104,186	13,977	27,251,397
Lease liabilities	-	30,062,178	131,805	-	-	417,690	304,266	30,915,939
Borrowings	65,414,272	464,694,714	-	-	-	17,950,971	16,911,744	564,971,701
Subordinated debts	-	139,302,580	-	-	-	-	-	139,302,580
Total financial liabilities	690,205,375	4,255,089,542	43,075,594	5,032,156	96	114,018,830	22,918,022	5,130,339,615
Net on-balance sheet position	8,978,923	195,159,970	3,738,616	(477,163)	259,168	34,315,580	16,357,421	258,332,515
In KHR'000 equivalent (Note 4)	36,589,111	795,276,878	15,234,860	(1,944,439)	1,056,110	139,835,989	66,656,490	1,052,704,999
Unused portion of overdrafts	1,498,045	91,495,024	66,994	-	-	-	-	93,060,063
Guarantees, acceptances and other financial facilities	4,229,904	42,756,751	43,550	70,000			280,542	47,380,747
Credit commitment	5,727,949	134,251,775	110,544	70,000		-	280,542	140,440,810
In KHR'000 equivalent (Note 4)	23,341,392	547,075,983	450,467	285,250		-	1,143,209	572,296,301

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

				The Bank				
				In US\$ equiva				
	KHR	USD	THB	EUR	AUD	LAK	Others	Total
As at 31 December 2020								
Financial assets								
Cash on hand	103,480,325	283,028,828	9,927,044	2,965,106	226,023	3,227	1,185,573	400,816,126
Deposits and placements with other banks	78,882,898	426,153,616	613,723	1,200,340	78,488	-	700,342	507,629,407
Financial investments	32,362,619	534,311,904	-	-	-	-	-	566,674,523
Loans and advances	605,355,297	3,659,699,428	27,594,434	-	-	-	-	4,292,649,159
Other assets	111,994	6,811,221	7	-	-	-	-	6,923,222
Total financial assets	820,193,133	4,910,004,997	38,135,208	4,165,446	304,511	3,227	1,885,915	5,774,692,437
Financial liabilities	04 000 050	004 704 000	070 440					000 704 554
Deposits and placements of other banks and financial institutions	34,696,856	261,794,286	273,412	-	-	-	-	296,764,554
Deposits from customers	731,889,478	3,411,404,278	33,150,980	3,824,001	-	-	-	4,180,268,737
Other liabilities	1,150,276	27,196,955	29,335	112,286	-	-	107	28,488,959
Lease liabilities	-	25,772,385	-	-	-	-	-	25,772,385
Borrowings	40,101,721	467,251,195	-	-	-	-	-	507,352,916
Subordinated debts	-	167,158,623	-	-	-	-	-	167,158,623
Total financial liabilities	807,838,331	4,360,577,722	33,453,727	3,936,287	-	-	107	5,205,806,174
Net on-balance sheet position	12,354,802	549,427,275	4,681,481	229,159	304,511	3,227	1,885,808	568,886,263
In KHR'000 equivalent (Note 4)	49,975,174	2,222,433,327	18,936,591	926,948	1,231,747	13,053	7,628,095	2,301,144,935
Unused portion of overdrafts	2,331,747	116,705,275	1,071,940	-	-	-	-	120,108,962
Guarantees, acceptances and other financial facilities	5,551,196	45,782,782	2,810,817	349,515		-	200,170	54,694,480
Credit commitment	7,882,943	162,488,057	3,882,757	349,515	-	-	200,170	174,803,442
In KHR'000 equivalent (Note 4)	31,886,504	657,264,191	15,705,752	1,413,788	-	-	809,688	707,079,923

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.2 Market risk (continued)

				-	Bank			
	KHR	USD	THB	EUR	quivalent AUD	LAK	Others	Total
As at 31 December 2019		030	ПВ	LOK	AUD	LAN	Oulers	IOtai
Financial assets								
Cash on hand	73.824.417	326,481,164	7,846,913	1,640,057	255,318	1,533	906,465	410,955,867
Deposits and placements with other banks	134,547,685	416.769.673	3,254,084	2,857,189	- 200,010	-	1,183,709	558,612,340
Financial investments	49,132	527,425,844		_,001,100	-	-	-	527,474,976
Loans and advances	490,616,838	3,168,103,804	27,858,301	-	-	-	-	3,686,578,943
Other assets	110,416	5,822,858	2,418	-	-	-	-	5,935,692
Total financial assets	699,148,488	4,444,603,343	38,961,716	4,497,246	255,318	1,533	2,090,174	5,189,557,818
Financial liabilities								
Deposits and placements of other banks and financial institutions	28,342,365	242,258,492	3,676,864	-	-	-	-	274,277,721
Deposits from customers	592,856,864	3,355,015,800	30,264,348	4,009,451	96	-	-	3,982,146,559
Other liabilities	3,646,652	21,433,839	11,342	1,022,705	-	181	1,186	26,115,905
Lease liabilities	-	27,789,168	-	-	-	-	-	27,789,168
Borrowings	65,414,272	452,653,856	-	-	-	-	-	518,068,128
Subordinated debts	-	139,302,580	-	-	-	-	-	139,302,580
Total financial liabilities	690,260,153	4,238,453,735	33,952,554	5,032,156	96	181	1,186	4,967,700,061
Net on-balance sheet position	8,888,335	206,149,608	5,009,162	(534,910)	255,222	1,352	2,088,988	221,857,757
In KHR'000 equivalent (Note 4)	36,219,966	840,059,653	20,412,335	(2,179,758)	1,040,030	5,509	8,512,626	904,070,360
	4 400 045	01 405 00 1	00.001					00.000.000
Unused portion of overdrafts	1,498,045	91,495,024	66,994	-	-	-	-	93,060,063
Guarantees, acceptances and other financial facilities	4,229,904	42,729,947	43,550	70,000	<u> </u>	-	280,542	47,353,943
	5,727,949	134,224,971	110,544	70,000		-	280,542	140,414,006
In KHR'000 equivalent (Note 4)	23,341,392	546,966,757	450,467	285,250	-	-	1,143,208	572,187,074

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. FINANCIAL RISK MANAGEMENT (continued)

35.2 Market risk (continued)

(ii) Foreign exchange risk (continued)

Sensitivity analysis

The Group and the Bank is exposed to changes in US dollar and other foreign currencies exchange rate. Due to a reasonably possible strengthening (weakening) of the US dollar against foreign currencies, the Group and the Bank's exposure to other foreign exchange movement is not material.

(iii) Price risk

The Group and the Bank is not exposed to securities price risk because it does not hold any investment held and classified on the statement of financial position at fair value.

35.3 Liquidity risk

Liquidity risk is the risk that the Bank is unable to meet its obligations or payment or offset positions in a given economic and financial context and specific market situation. Typically, it is the risk of loss arising from situation where 1) the Bank has not enough cash and/or cash equivalents to meet the needs of depositors, borrowers, and contingent liabilities, 2) the sale of illiquid assets lower than market price, and 3) illiquid assets would not be sold at the desired time due to a lack of buyers.

The objective of the Group's liquidity risk management is to ensure that the Group can meet its cash obligations in a timely and cost-effective manner. To this end, the Group's liquidity and funding management policy is to maintain high quality and well diversified portfolios of liquid assets and sources of funds under both normal business and stress conditions. Due to its large distribution network and strategic marketing focus, the Group is able to maintain a diversified core deposit base comprising savings, demand, and fixed deposits. This provides the Group a large stable funding base.

(a) Liquidity risk management process

The day-to-day responsibility for liquidity risk management and control is delegated to the ALCO which monthly report to executive committee.

For day-to-day liquidity management, the treasury operations will ensure sufficient funding to meet its intraday payment and settlement obligations on a timely basis. Besides, the process of managing liquidity risk also includes:

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

a) Liquidity risk management process (continued)

Principles of the liquidity risk:

- At all times the related senior management of the treasury group shall ensure that the Bank's operations can meet its current and future funding needs. The Treasury Department shall stress-test its liquidity position on a daily basis
- The related senior management of treasury group has established a risk control framework and
 procedures to ensure it maintains sufficient liquidity at all time, including the holding of unencumbered
 eligible assets, to withstand a range of stress events, including the loss of funding sources such as
 deposits, borrowings, capital raising that liquidity risk is managed in accordance with the requirements
 of the Board.
- Stress testing is performed regularly to assess various scenarios includes short, medium and long-term, institution-specific and market-wide stress which may put the Bank's liquidity at risk.
- The Treasury Department identifies, monitors, manages and controls the risk associated intraday liquidity as well as short, medium and long-term liquidity as these are key periods for liquidity management. The Treasury Department develops and implements stress tests on the projected cash flows. The outputs are used to inform the Bank's contingency funding plan.
- The Bank incorporates liquidity cost, benefits and risks in the internal pricing, performance measurement, and new products/services approval process for all significant business activities (both on and off balance sheet) in order to align with the benefits from accepting risks of each business unit and liquidity risks affecting the business activities of the Bank.

Internal targets of the liquidity risk:

- The regulatory limit on the Liquidity Coverage Ratio (LCR) should be observed at all times.
- The Bank will have, at all times, an internal targets that is higher than the regulatory limit to allow for a safety margin to ensure permanent full compliance with regulatory limit.
- Setting the level of the internal targets is at the discretion of the ALCO and needs to be both 1) stated and motivated in the ALCO minutes and 2) formally approved by the President & Group Managing Director.
- The risk tolerance/internal targets must be reviewed at least once a year to reflect the financial condition and the funding mobilization capacity
- Relevant divisions and departments should regularly assess and monitor the perceived risks of noncompliance to the targets. Any breaches of internal targets should be reported to the ALCO for remedial actions and President & Group Managing Director for approval.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

a) Liquidity risk management process (continued)

Internal targets of the liquidity risk: (continued)

- Any change level of internal targets will need to be reported by e-mail to the Chair of the BRIC on the same day the change has been made.
- At all time, the Bank will have a contingency plan to be executed when it is perceived by the Bank that the safety margin may not be sufficient and there is a risk that the regulatory limit on liquidity could be breached. Such contingency plan should be sufficient to ensure that the regulatory limits on liquidity will not be breached.
- In case, the Bank experiences a severe liquidity, the Bank must immediately notify NBC and advise the action that is being taken to address the situation.

The Bank has put in place a robust and comprehensive liquidity risk management framework in accordance with National Bank of Cambodia's Prakas No. B7-017-301 dated on 27 September 2017 on Liquidity Risk Management Framework (LRMF), which consists of risk appetite, risk tolerance, policies, early warning indicators, and monitoring mechanism which are reviewed and endorsed by BRMC and approved by the Board. The key elements of the framework are to ensure that the Bank maintains sufficient liquidity at all times, including the holding of unencumbered eligible assets, to withstand a range of stress events, including the loss of funding sources, either internally (as with deposits) or externally (as with borrowings or raising additional capital), and other issues. The Bank ensures that the business activities are mainly funded with stable sources of funding on an ongoing basis.

The management designs a set of early warning indicators to aid its daily liquidity risk management processes in identifying the emergence of increased risk or vulnerabilities in its liquidity risk position or potential funding needs.

The Bank's contingency liquidity plan (CLP) is in place to alert and to enable the management to act effectively and efficiently during a liquidity crisis and under adverse market conditions. The objective of contingency liquidity plan is to ensure that the bank has a framework for managing the liquidity sufficiently and robustly in the event of liquidity crisis based on the result of liquidity stress testing.

The Group is measuring, monitoring and managing its liquidity positions to comply with the regulatory Liquidity Coverage Ratio (LCR). The Bank shall calculate Liquidity Coverage Ratio (LCR) using new reporting template from 1 January 2016 via a phase-in period until fully comply by 1 January 2020. The Bank shall, at all time, maintain an adequate stock of eligible liquid assets to fulfil the LCR limits as determined in accordance with the following timeline:

With effect from	1 September 2016	1 September 2017	1 September 2018	1 June 2019	1 January 2020
Minimum LCR	60%	70%	80%	90%	100%

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

a) Liquidity risk management process (continued)

The purpose of the LCR aims at promoting short-term resilience of each institution's liquidity risk profile, ensuring that each institution has an adequate stock of unencumbered liquid assets that can be converted into cash at no or little loss of value in markets, to meet its liquidity needs for a 30-day liquidity stress scenario, and ensuring that prompt corrective actions are taken by the institution's management when the LCR potentially falls below the minimum requirement.

The Bank also uses a range of tools such as liquidity ratio, liquidity gap analysis, safety margin, and monthly cash flow projection to measure, monitor and manage its liquidity positions. In addition, The Bank also performs daily and monthly liquidity stress test in order to identify and quantify its exposures to possible future liquidity stresses, analysing possible impacts on the Bank's cash flows, liquidity position, profitability and solvency.

(b) Funding approach

The Group's main sources of liquidities arise from shareholder's paid-up capital, borrowings, subordinated debts, due to other banks and financial institutions and deposits from customers. The sources of liquidity are regularly reviewed daily through management's review of maturity of fixed deposits and key depositors. For borrowings and subordinated debts are also regularly reviewed daily via management's review of interest and principal repayments and maturity.

(c) Non-derivative cash flows

The table below presents the cash flows payable under non-derivative financial liabilities and assets held for managing liquidity risk by remaining contractual maturities at the reporting period. The amounts disclosed in the table are the contractual undiscounted cash flows, whereas the Group manages the inherent liquidity risk based on contractual undiscounted cash flows.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

c) Non-derivative cash flows (continued)

				The Group			
	Up to 1 month US\$	1 to 3 months US\$	3 to 6 months US\$	6 to 12 months US\$	1 to 5 years US\$	Over 5 years US\$	Total US\$
As at 31 December 2020	· · · · ·	·	·	·	<u> </u>	<u> </u>	<u> </u>
Financial liabilities							
Deposits and placements of other banks and financial institutions	175,970,349	9,215,069	13,017,546	33,584,422	40,747,725	103,351,755	375,886,866
Deposits from customers	2,531,089,539	272,332,376	336,468,086	653,630,934	592,339,778	25,243,282	4,411,103,995
Other liabilities	28,620,226	63,785	12,677	2,540	-	-	28,699,228
Lease liabilities	1,170,306	1,535,260	2,503,107	5,053,229	20,581,294	3,816,462	34,659,658
Borrowings	3,385,091	64,831,199	10,292,464	67,477,276	445,672,141	5,985,745	597,643,916
Subordinated debts	<u> </u>	45,834	4,558,596	16,776,922	127,967,578	69,556,379	218,905,309
Total financial liabilities (contractual maturity dates)	2,740,235,511	348,023,523	366,852,476	776,525,323	1,227,308,516	207,953,623	5,666,898,972
In KHR'000 equivalent (Note 4)	11,084,252,642	1,407,755,151	1,483,918,265	3,141,044,932	4,964,462,947	841,172,405	22,922,606,342
Assets held for managing liquidity risk (contractual maturity dates)	1,669,790,664	317,803,320	423,641,084	718,599,200	3,405,850,353	620,482,217	7,156,166,838
In KHR'000 equivalent (Note 4)	6,754,303,236	1,285,514,429	1,713,628,185	2,906,733,764	13,776,664,678	2,509,850,568	28,946,694,860
As at 31 December 2019							
Financial liabilities							
Deposits and placements of other banks and financial institutions	172,835,944	10,288,815	11,750,142	9,602,863	36,520,215	105,936,955	346,934,934
Deposits from customers	2,402,381,760	279,218,632	359,057,249	673,746,233	448,897,971	19,882,611	4,183,184,456
Other liabilities	26,675,519	236,497	339,381	-	-	-	27,251,397
Lease liabilities	1,042,790	1,367,706	2,576,174	5,081,428	23,121,979	4,760,054	37,950,131
Borrowings	26,184,654	27,992,072	75,895,128	80,685,179	423,525,392	5,318,536	639,600,961
Subordinated debts	-	-	4,325,282	12,555,044	101,690,664	79,406,271	197,977,261
Total financial liabilities (contractual maturity dates)	2,629,120,667	319,103,722	453,943,356	781,670,747	1,033,756,221	215,304,427	5,432,899,140
In KHR'000 equivalent (Note 4)	10,713,666,718	1,300,347,667	1,849,819,176	3,185,308,294	4,212,556,601	877,365,540	22,139,063,996
Assets held for managing liquidity risk (contractual maturity dates)	1,343,277,244	632,545,967	404,176,750	663,729,352	3,005,271,271	369,127,493	6,418,128,077
in KHR'000 equivalent (Note 4)	5,473,854,769	2,577,624,816	1,647,020,256	2,704,697,109	12,246,480,429	1,504,194,534	26,153,871,913

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

c) Non-derivative cash flows (continued)

				The Bank			
	Up to	1 to 3	3 to 6	6 to 12	1 to 5	Over	
	1 month US\$	months US\$	months US\$	months US\$	years US\$	5 years US\$	Total US\$
As at 31 December 2020							
Financial liabilities							
Deposits and placements of other banks and financial institutions	176,671,075	7,124,445	2,186,170	25,015,940	40,747,725	103,351,754	355,097,109
Deposits from customers	2,477,890,696	263,366,379	325,733,156	635,073,701	567,433,640	19,756,459	4,289,254,031
Other liabilities	28,434,359	54,600	-	-	-	-	28,488,959
Lease liabilities	1,082,083	1,494,995	2,374,137	4,704,387	18,888,896	655,929	29,200,427
Borrowings	1,442,209	60,301,229	3,999,653	58,135,533	430,242,996	3,753,850	557,875,470
Subordinated debts	<u> </u>	45,834	4,558,596	16,776,922	127,967,578	69,556,379	218,905,309
Total financial liabilities (contractual maturity dates)	2,685,520,422	332,387,482	338,851,712	739,706,483	1,185,280,835	197,074,370	5,478,821,304
In KHR'000 equivalent (Note 4)	10,862,930,107	1,344,507,365	1,370,655,175	2,992,112,724	4,794,460,978	797,165,827	22,161,832,176
Assets held for managing liquidity risk (contractual maturity dates)	1,622,393,307	296,587,899	398,341,665	685,014,808	3,318,881,281	614,987,111	6,936,206,071
In KHR'000 equivalent (Note 4)	6,562,580,927	1,199,698,051	1,611,292,035	2,770,884,898	13,424,874,782	2,487,622,864	28,056,953,557
As at 31 December 2019							
Financial liabilities							
Deposits and placements of other banks and financial institutions	176,209,427	8,164,348	5,010,927	5,657,352	34,612,283	105,936,955	335,591,292
Deposits from customers	2,358,491,961	273,218,232	350,178,997	657,013,977	421,325,292	14,204,400	4,074,432,859
Other liabilities	26,115,905	-	-	-	-	-	26,115,905
Lease liabilities	987,076	1,350,145	2,290,717	4,672,594	21,444,212	1,373,972	32,118,716
Borrowings	25,752,724	22,647,953	69,429,074	72,502,200	391,929,778	-	582,261,729
Subordinated debts	-	-	4,325,282	12,555,044	101,690,664	79,406,271	197,977,261
Total financial liabilities (contractual maturity dates)	2,587,557,093	305,380,678	431,234,997	752,401,167	971,002,229	200,921,598	5,248,497,762
In KHR'000 equivalent (Note 4)	10,544,295,154	1,244,426,263	1,757,282,613	3,066,034,756	3,956,834,083	818,755,512	21,387,628,381
Assets held for managing liquidity risk (contractual maturity dates)	1,293,027,835	608,704,366	374,962,240	624,041,709	2,909,086,466	367,983,735	6,177,806,351
In KHR'000 equivalent (Note 4)	5,269,088,428	2,480,470,291	1,527,971,128	2,542,969,964	11,854,527,349	1,499,533,720	25,174,560,880

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

(d) Off-balance sheet items

i. Loan commitments and guarantee

The dates of the contractual amounts of the Group's and the Bank's off-balance sheet financial instruments that commit it to extend credit to customers and other facilities (Note 32) are summarised in table below:

	The Group					
	Up to 1 month US\$	1 to 3 months US\$	3 to 12 months US\$	1 to 5 years US\$	Over 5 years US\$	Total US\$
At 31 December 2020						
Unused portion of overdrafts	120,937,607	-	-	-	-	120,937,607
Bank guarantees	2,525,862	8,901,002	20,652,127	14,959,175	-	47,038,166
Letters of credit	2,025,994	5,528,555	308,269	-	-	7,862,818
Gross settled (interest rate swap - cash flow hedges)						
- (inflow)	-	(55,905)	(497,068)	(1,022,263)	(7,569)	(1,582,805)
- outflow	-	526,497	2,200,304	4,501,866	12,583	7,241,250
Net	<u> </u>	470,592	1,703,236	3,479,603	5,014	5,658,445
Total	125,489,463	14,900,149	22,663,632	18,438,778	5,014	181,497,036

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

- (d) Off-balance sheet items (continued)
- *i.* Loan commitments and guarantee (continued)

	The Group					
	Up to 1 month	1 to 3 months	3 to 12 months	1 to 5 years	Over 5 years	Total
	US\$	US\$	US\$	US\$	US\$	US\$
At 31 December 2019						
Unused portion of overdrafts	93,060,063	-	-	-	-	93,060,063
Bank guarantees	4,160,581	8,694,805	21,218,165	4,358,846	-	38,432,397
Letters of credit	1,596,300	3,982,916	3,369,134	-	-	8,948,350
Gross settled (interest rate swap - cash flow hedges)						
- (inflow)	(207,366)	(51,621)	(1,805,889)	(1,197,379)	-	(3,262,255)
- outflow	150,582	39,248	2,100,484	1,702,899		3,993,213
Net	(56,784)	(12,373)	294,595	505,520		730,958
Total	98,760,160	12,665,348	24,881,894	4,864,366		141,171,768

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

- (d) Off-balance sheet items (continued)
- *i.* Loan commitments and guarantee (continued)

	The Bank					
	Up to 1 month US\$	1 to 3 months US\$	3 to 12 months US\$	1 to 5 years US\$	Over 5 years US\$	Total US\$
At 31 December 2020						
Unused portion of overdrafts	120,108,962	-	-	-	-	120,108,962
Bank guarantees	2,525,862	8,901,002	20,446,986	14,957,812	-	46,831,662
Letters of credit	2,025,994	5,528,555	308,269	-	-	7,862,818
Gross settled (interest rate swap - cash flow hedges)						
- (inflow)	-	(55,905)	(497,068)	(1,022,263)	(7,569)	(1,582,805)
- Outflow	-	526,497	2,200,304	4,501,866	12,583	7,241,250
Net	<u> </u>	470,592	1,703,236	3,479,603	5,014	5,658,445
Total	124,660,818	14,900,149	22,458,491	18,437,415	5,014	180,461,887

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

- (d) Off-balance sheet items (continued)
- *i.* Loan commitments and guarantee (continued)

	The Bank					
	Up to 1 month US\$	1 to 3 months US\$	3 to 12 months US\$	1 to 5 years US\$	Over 5 years US\$	Total US\$
At 31 December 2019						
Unused portion of overdrafts	93,060,063	-	-	-	-	93,060,063
Bank guarantees	4,160,581	8,670,727	21,215,439	4,358,846	-	38,405,593
Letters of credit	1,596,300	3,982,916	3,369,134	-	-	8,948,350
Gross settled (interest rate swap - cash flow hedges)						
- (inflow)	(207,366)	(51,621)	(1,805,889)	(1,197,379)	-	(3,262,255)
- outflow	150,582	39,248	2,100,484	1,702,899	-	3,993,213
Net	(56,784)	(12,373)	294,595	505,520	-	730,958
Total	98,760,160	12,641,270	24,879,168	4,864,366		141,144,964

ii. Other financial facilities

Other financial facilities are also included as above based on the earliest contractual date.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.3 Liquidity risk (continued)

(e) COVID-19 pandemic and impact on liquidity

In line with the additional measures of the National Bank of Cambodia which set out to provide an additional liquidity to the banking and financial sector to mitigate the impact of COVID-19 pandemic, the Bank has also continued to place greater emphasis on liquidity management with introduced risk management measures to reduce liquidity risk and maintain business continuity such as:

- The Bank has maintained the optimal level of fund or cash-on-hand for operation at headquarters, branches, and ATMs in order to deal with the unprecedented events resulted from the COVID-19 pandemic;
- As part of the implementation of the contingency funding plan, the Bank has signed facility agreements with lenders for long-term loans (senior loans);
- Additionally, the Bank has communicated and negotiated with potential lenders for acquiring long-term loans (senior loans) for the year of 2021.

35.4 Fair value of financial instruments

Financial instruments comprise financial assets and financial liabilities. The Group and the Bank have an established framework and policies which provide guidance concerning the practical considerations, principles and analytical approaches for the establishment of prudent valuation for financial instruments measured at fair value.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

The valuation of financial instruments are determined by reference to quoted prices in active markets or by using valuation techniques based on observable inputs or unobservable inputs. Management judgment is exercised in the selection and application of appropriate parameters, assumptions and modelling techniques where some or all of the parameter inputs are not observable in deriving fair value.

Valuation adjustment is also an integral part of the valuation process. Valuation adjustment is to reflect the uncertainty in valuations generally for products that are less standardised, less frequently traded and more complex in nature. In making a valuation adjustment, the Group and the Bank follow methodologies that consider factors such as liquidity, bid-offer spread, and unobservable prices and inputs in the market and uncertainties in the assumptions and parameters.

The Group and the Bank continuously enhance its design, validation methodologies and processes to ensure the valuations are reflective. The valuation models are validated both internally and externally, with periodic reviews to ensure the model remains suitable for its intended use.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.4 Fair value of financial instruments (continued)

Determination of fair value:

The Group and the Bank classify its financial instruments measured at fair value according to the following hierarchy, reflecting the significance of the inputs in making the fair value measurements:

- Level 1 Inputs to the valuation methodology are quoted prices (unadjusted) for identical assets or liabilities in active markets.
- Level 2 Inputs to the valuation methodology include:
 - Quoted prices for similar assets and liabilities in active markets; or
 - · Quoted prices for identical or similar assets and liabilities in non-active markets; or
 - Inputs that are observable for the asset or liability, either directly or indirectly, for substantially the full term of the financial instrument.
- Level 3 One or more inputs to the valuation methodology are unobservable and significant to the fair value measurement.

Assets and liabilities are classified as Level 1 when the valuation is based on quoted prices for identical assets or liabilities in active markets.

Assets and liabilities are regarded as being quoted in an active market if the prices are readily available from a published and reliable source and those prices represent actual and regularly occurring market transactions on an arm's length basis.

When fair value is determined using quoted prices of similar assets and liabilities in active markets or quoted prices of identical or similar assets and liabilities in non-active markets, such assets and liabilities are classified as Level 2. In cases where quoted prices are generally not available, the Group and the Bank determine fair value based upon valuation techniques that use market parameters as inputs. Most valuation techniques employ observable market data, including but not limited to yield curves, equity prices, volatilities and foreign exchange rates.

Assets and liabilities are classified as Level 3 if their valuation incorporates significant inputs that are not based on observable market data. Such inputs are determined based on observable inputs of a similar nature, historical observations or other analytical techniques.

If prices or quotes are not available for an instrument or a similar instrument, fair value will be established by using valuation techniques or Mark-to-Model. Judgment may be required to assess the need for valuation adjustments to appropriately reflect unobservable parameters. The valuation models shall also consider relevant transaction data such as maturity. The inputs are then benchmarked and extrapolated to derive the fair value.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.4 Fair value of financial instruments (continued)

Determination of fair value: (continued)

(a) Financial instruments measured at fair value

The Group and the Bank did not have significant amounts of financial instruments measured at fair value.

(b) Financial instruments not measured at fair value

As at the reporting date, the fair values of financial instruments of the Group and the Bank approximate their carrying amounts.

The estimated fair values are based on the following methodologies and assumptions:

i. Deposits and placements with other banks

Deposits and placements with other banks include current accounts which are non-interest bearing, savings deposits and short-term deposits. The fair value of deposits and placements with other banks approximate their carrying values at the reporting date due to the relatively short maturity of these instruments.

ii. Financial investments

• Financial investments at FVOCI

This represents the Bank's investment in Credit Bureau Holding (Cambodia) Ltd. with 5% as Equity Cash Investment and 1% through the Association of Banks in Cambodia. No fair value disclosures are provided for equity investment securities of US\$153,529 (2019: US\$153,529) that are measured at cost because their fair value cannot be reliably measured. The investment is neither redeemable nor transferable and there is no market for them. The Group and the Bank do not intend to dispose of the investment.

• Financial investments at amortised cost

Financial investments at amortised cost include negotiable certificate of deposits ("NCD") with the National Bank of Cambodia with maturities of less than one year. The fair value of financial investments approximates their carrying values at the reporting date due to the relatively short maturity of these instruments.

iii. Loans and advances

The fair value of loans and advances is based on observable market transactions. Where observable market transactions are not available, fair value is estimated using valuation models, such as discounted cash flow techniques. Input into the valuation techniques includes expected lifetime credit losses, interest rates, prepayment rates and primary origination or secondary market spreads. For collateral-dependent impaired loans, the fair value is measured based on the value of the underlying collateral.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.4 Fair value of financial instruments (continued)

- (b) Financial instruments not measured at fair value (continued)
- iii. Loans and advances (continued)

Input into the models may include data from third party and information obtained from other market participants, which includes observed primary and secondary transactions. Its carrying value approximates to fair value at the reporting date.

iv. Deposits and placements of other banks and financial institutions and deposits from customers

The fair value of deposits and placements of other banks and financial institutions and deposits from customers with maturities of less than one year approximates their carrying amount due to the relatively short maturity of these instruments. The fair value of deposits and placements of other banks and financial institutions and deposits from customers with remaining maturities of more than one year are expected to approximates their carrying amount due to the Group and the Bank offered similar interest rate of the instrument with similar maturities and terms.

The estimated fair value of deposits with no stated maturities, which includes non-interest bearing deposits, deposits payable on demand is the amount payable at the reporting date.

v. Other assets and other liabilities

The carrying amounts of other financial assets and other financial liabilities are assumed to approximates their fair values as these items are not materially sensitive to the shift in market interest rates.

vi. Borrowings and subordinated debts

The fair value of borrowings and subordinated debts are estimated by discounting the expected future cash flows using the applicable prevailing market interest rates for borrowings with similar risk profiles. However, only the contractual interest rates which are confirmed and provided by all lenders are available at the reporting date instead of the applicable prevailing market interest rates. The Group and the Bank believed that the contractual interest rates were not significantly different to the prevailing market interest rates on the ground that there was no change to interest rates following the lenders' consideration on the Group's and the Bank's credit risk profile as at reporting date. On this basis, the fair value of borrowings and subordinated debts approximates their carrying values at the reporting date.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

35. Financial risk management (continued)

35.5 Capital management

The Bank's objectives when managing capital, which is a broader concept than the 'equity' on the face of statement of financial position, are:

- To comply with the capital requirement set by the National Bank of Cambodia;
- To safeguard the Bank's ability to continue as a going concern so that it can continue to provide returns for shareholders and benefits for other stakeholders; and
- To maintain a strong capital base to support the development of business.

The National Bank of Cambodia requires all commercial banks to i) hold minimum capital requirement, ii) maintain the Bank's net worth at least equal to minimum capital, and iii) comply with solvency ratio, liquidity coverage ratio and other prudential ratios.

The table below summarises the composition of regulatory capital follows requirement of the National Bank of Cambodia, and the amounts are based on the separate financial statements for the year ended 31 December 2020.

	The Bank					
	2020 US\$	2019 US\$	2020 KHR'000 (Note 4)	2019 KHR'000 (Note 4)		
Tier 1 capital						
Share capital	433,163,019	428,818,154	1,752,144,412	1,747,433,978		
Share Premium	11,706,215	-	47,351,640	-		
Retained earnings	138,414,769	117,886,779	559,887,741	480,388,624		
General reserves	455,413,629	388,464,324	1,842,148,129	1,582,992,120		
Less: Intangible assets	(13,884,558)	(7,915,362)	(56,163,037)	(32,255,100)		
Less: Loans to related parties	(19,436,759)	(10,242,118)	(78,621,690)	(41,736,631)		
	1,005,376,315	917,011,777	4,066,747,195	3,736,822,991		
Tier 2 complementary capital						
General provision	44,467,660	37,843,403	179,871,685	154,211,867		
Subordinated debts (*)	166,723,802	138,887,498	674,397,779	565,966,554		
Less: Equity participation in banking or						
financial institutions	(71,310,571)	(71,310,571)	(288,451,260)	(290,590,577)		
	139,880,891	105,420,330	565,818,204	429,587,844		
	1,145,257,206	1,022,432,107	4,632,565,399	4,166,410,835		

(*) This represents subordinated debts approved by the National Bank of Cambodia.

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED) FOR THE YEAR ENDED 31 DECEMBER 2020

36. Tax contingencies

On 24 December 2018, the Bank obtained the letter on Tax Reassessment for the financial years ended 2009 to 2013 from Department of Enterprise Tax Audit ("DETA") of the General Department of Taxation ("GDT") which has requested the Bank to pay the tax liabilities on various tax matters.

On 11 January 2019, the Bank lodged the administrative protests against the reassessment in accordance with the tax provisions. The protest letter was prepared by the Bank and submitted to the GDT on the grounds that the reassessment is not appropriate.

On 17 September 2019, the Bank received Notification Letter for Tax Collection from GDT, requesting for payment on tax in arrears resulted from above Tax Reassessment. On 23 September 2019, the protest letter was prepared by the Bank again and submitted to the GDT on the grounds that the reassessment is not appropriate. On 10 February 2020, the Bank received the Notification Letter from GDT on the temporary delay over tax collection related to above tax re-assessment.

Additionally, on 10 March 2020, the Bank received the Notification Letter from GDT to conduct tax audit for the fiscal years from 2015 to 2018 in which the Bank provided some requested documents to GDT on 2 July 2020. There has been no official response on the protest letter above as well as the outcome of the tax audit for the fiscal years from 2015 to 2018 from GDT as at date of these financial statements. Management believes that the tax liability recorded by the Bank is adequate.

37. Significant event

Initial Public Offering ("IPO")

On 25 February 2020, the Bank obtained approval in principle for the Bank's IPO from the Board of the Securities and Exchange Commission of Cambodia ("SECC"). The Bank and Yuanta Securities (Cambodia) Plc. ("YSC"), the underwriter, conducted the Book Building process from 3 to 14 March 2020. On 20 March 2020, the result of the Book Building was released, with 2,180 investors participated, in which 95.55% and 4.45% are local and foreign investors, respectively. The final offering price has been set at KHR16,200 (US\$3.97) in accordance with the Book Building and Subscription Procedure approved by the SECC.

The Subscription phase started from 24 March 2020 to 24 April 2020 and the result was released on 30 April 2020 with 4,344,865 shares were subscribed.

The shares of the Bank were listed on the Cambodia Securities Exchange ("CSX") on 25 May 2020.