

Technical update

February 2026

Ministry of Commerce

Announcement No. 0051 dated 8 January 2026 on Waiver of Penalty for Companies Failing with ADCE Filing, Limiting the Penalty to the Last One Year “Announcement”

The Ministry of Commerce (“MoC”) has announced a penalty waiver policy under which companies that failed to file their Annual Declaration of Commercial Enterprises (“ADCE”) are required to pay only the penalty for the most recent year. Previously, late filing of the ADCE was subject to a penalty of KHR 2,000,000 (approximately USD 500) per year of non compliance.

To qualify for this penalty waiver policy, companies must meet the following conditions:

1. **Pay the penalty for the most recent year** within **60 working days** from the announcement date (i.e., by 8 January 2026).
2. **Participate in the shareholder background-check process** to support compliance with anti-money laundering requirements.

Companies that fail to comply with the above conditions or do not meet the deadline will be classified as an **Inactive Company**. This status may adversely affect their business registration standing and legal rights under applicable laws and regulations.

This announcement reflects the Royal Government’s broader efforts to strengthen the business environment by promoting greater compliance with commercial laws and business registration requirements. It also seeks to enhance administrative efficiency within the MoC by streamlining processes and improving the effectiveness of the business registration system.

Our Comments:

The MoC’s new penalty-waiver initiative represents a practical and business-friendly approach to addressing longstanding ADCE compliance gaps. By limiting penalties to the most recent year and linking the relief to Anti Money Laundering shareholder background checks, the policy both encourages timely rectification and strengthens regulatory transparency.

This measure should help many companies regularize their status at a manageable cost, while also improving the accuracy of Cambodia’s commercial registry. However, businesses must act promptly, as failure to meet the deadline or compliance requirements may result in an Inactive Company status, which could significantly hinder future operations and legal rights.

As a trusted professional firm, KPMG Cambodia is pleased to discuss how these updates may impact your business. For more information or any related inquiries, please feel free to contact us.

Contact us

Email: info@kpmg.com.kh

Tel: +855 (17) 666 537

So Dary

Partner

E daryso@kpmg.com.kh

Richard Nuttall

Director

E richardjosephnuttall@kpmg.com.kh

Neou Seyla

Associate Director

E nseyla@kpmg.com.kh

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

© 2026 KPMG Cambodia Ltd., a Cambodian single member private limited company and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.



Scan to visit our website: kpmg.com.kh