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INSIGHTS

AUDIT & ASSURANCE

ISA 580 written representations in Cambodian audits

What written representations a Cambodian auditor obtains under ISA 580, when they are sufficient, and why they never replace other audit evidence.



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WHAT WRITTEN REPRESENTATIONS DOES AN AUDITOR OBTAIN UNDER ISA 580 IN CAMBODIA?

ISA 580 requires the auditor to obtain written representations from management and, where appropriate, those charged with governance that they have fulfilled their responsibility for the preparation of the financial statements, that they have provided all relevant information and access, and that all transactions have been recorded and reflected. The representations are dated as of the date of the auditor's report, cover the financial statements and the specific matters required by other standards, and are evaluated for consistency with other evidence. In Cambodia, the representations may be bilingual and should be signed by the director or the person with the authority to bind the company; they support, but never replace, the audit evidence.

IN SHORT

- Written representations confirm management's responsibilities and the completeness of the information provided; they are not a substitute for audit evidence.
- They are dated as of the date of the auditor's report and signed by management with the appropriate authority.
- Other standards require specific representations, such as going concern, related parties, fraud, laws and subsequent events.
- If management refuses or the representations are inconsistent with other evidence, the auditor considers the effect on the opinion.
- In Cambodia, use a bilingual letter where needed and confirm the signatory's authority under the company's constitution.

Purpose and limit

Written representations are written statements by management provided to the auditor to confirm certain matters or to support other audit evidence. They are not a substitute for the audit evidence the auditor should obtain; they are a complement to it. The auditor obtains them because management is responsible for the financial statements and for the information provided to the auditor.

ISA 580 requires the auditor to obtain written representations that management has fulfilled its responsibility for the preparation and presentation of the financial statements, that it has provided all relevant information and access, and that all transactions have been recorded and reflected in the financial statements. The representations are dated as of the date of the auditor's report, because they cover the period up to that date.

The representations do not replace the auditor's own work. A representation that the inventory exists, that a receivable is recoverable or that a related party has been disclosed is not enough without the underlying evidence.

Form and content

The written representations are usually a letter from management addressed to the auditor. The letter identifies the financial statements, the period and the framework, and states management's responsibilities. It is signed by the director or the person with the authority to bind the company, and by the finance director or equivalent where appropriate.

The letter should include the general representations required by ISA 580 and the specific representations required by other standards, such as the going-concern assessment, the completeness of related-party disclosures, the absence of fraud, compliance with laws and regulations, the subsequent events, the accounting estimates and the tax positions. The specific matters depend on the audit.

If the financial statements are presented in Khmer and English, the representation letter should be in both languages or in the language the signatories understand. The auditor should confirm that the signatory has the authority to bind the company and that the letter is dated correctly.

CORE WRITTEN REPRESENTATIONS

Matter	Representation	Related standard
Financial statements	Prepared and presented in accordance with the framework	ISA 580
Information and access	All relevant information and access provided	ISA 580
Completeness	All transactions recorded and reflected	ISA 580
Going concern	The going-concern assessment and disclosure are appropriate	ISA 570
Related parties	Related parties and transactions are complete and disclosed	ISA 550
Fraud	Fraud or suspected fraud involving management is disclosed	ISA 240
Subsequent events	All subsequent events requiring adjustment or disclosure are reflected	ISA 560

Reliability and inconsistency

The auditor evaluates the written representations for consistency with other audit evidence. A representation that contradicts the evidence is a red flag. The auditor should investigate the inconsistency, obtain additional evidence and consider whether the representation is reliable.

If management refuses to provide a required representation, or the auditor has doubt about the reliability of the representations, the auditor should discuss the matter with those charged with governance, consider the effect on the audit opinion and, where necessary, withdraw from the engagement if the law permits.

A written representation is not a waiver of the auditor's responsibility. The auditor cannot rely on a representation to avoid performing a procedure that is otherwise required.

> ⚠ **A representation is not a receipt**
>
> Management's signature confirms responsibility; it does not prove the inventory exists, the receivable is recoverable or the tax position is correct. The underlying evidence is still required.

Cambodian practice

Cambodian companies often have a single director or a small board. The auditor should confirm the signatory's authority under the company's constitution, the MOC registration and any board resolution. A letter signed by an employee without authority is not sufficient.

The representation letter should cover the Cambodian-specific matters: the completeness of the VAT, Tax on Salary and withholding tax returns, the related-party transactions and the transfer pricing documentation, the tax reassessment or dispute status, and the compliance with the Law on Accounting and Auditing. These representations support, but do not replace, the tax and legal evidence.

For a group audit, the group auditor may obtain representations from group management and from component management. The representations should be coordinated with the component auditors and the group instructions.

- Bilingual letter where the signatories work in Khmer.
- Director or authorised signatory with a board resolution.
- Tax filings, related parties, transfer pricing and disputes.

- Going concern, subsequent events and fraud.
- Dated as of the date of the auditor's report.

Documentation and timing

The auditor documents the representations obtained, the date, the signatories, the matters covered and the evaluation of consistency with other evidence. The documentation should also record any refusal, inconsistency or doubt and the effect on the audit.

The representations are obtained as near as practicable to the date of the auditor's report. If the auditor's report is delayed, the representations may need to be updated for events after the original date. A representation letter dated before the completion of the audit is not sufficient for matters that arose later.

Key facts

How this article is checked

Figures were verified against the sources listed below in November 2026 and are re-checked each January or when the rule changes. Written by Liv Bonito, Co-founder & Managing Director. General information, not advice on your situation: for that, talk to a partner.

QUESTIONS

Questions people ask

Who signs the written representations?

Management with the appropriate authority, usually the director or the person authorised by the board, and the finance director where appropriate. The auditor confirms the signatory's authority under the company's constitution and board resolutions.

What if management refuses to provide a representation?

The auditor discusses the matter with those charged with governance, considers the effect on the audit opinion and may withdraw where the law permits. A refusal is a scope limitation, not a minor administrative issue.

Are written representations dated at the year-end?

No. They are dated as of the date of the auditor's report, because they cover management's responsibilities and the information provided up to that date. A letter dated at the year-end would not cover subsequent events.

Do written representations replace confirmations or other evidence?

No. They complement the audit evidence. The auditor still obtains confirmations, inspects documents, tests transactions and evaluates estimates. A representation alone is not sufficient for a material assertion.

SOURCES

Where the rules come from

01 ISA 580 Written Representations — IAASB / KICPAA

02 ISA 570 Going Concern, ISA 550 Related Parties, ISA 560 Subsequent Events and ISA 240 Fraud — IAASB / KICPAA

03 ISA 230 Audit Documentation — IAASB / KICPAA

04 Law on Accounting and Auditing (Royal Kram NS/RKM/0416/006, 11 April 2016) — Kingdom of Cambodia