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CAMBODIA'S POLICY ON THE ARTIFICIAL INTELLIGENCE: DETERMINANTS, DIRECTIONS, INTERIM OUTCOMES

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Abstract: The article aims to specify the degree of success Cambodia has been able to achieve in developing its Artificial Intelligence (AI) ecosystem seen through the prism of the state of the country's non-digital assets as an outcome of its economic modernization, as well as of its digital projects and initiatives. Outlining the specifics of Cambodia's economic modernization paradigm and assessing the results obtained to date, the paper considers major Cambodia's projects and initiatives in the digital field, their achievements and shortcomings, to finally turn to exploring Cambodia's digital tools and their development potential. The author argues that although Cambodia pays close attention to building its national digital ecosystem, a gap between its non-digital and digital tools (the former lag far behind the latter) narrows its space of maneuver with regard to implementing comprehensive policy in the AI field. The fundamental problem with Cambodia's policy on AI is not its failure to "think big", but rather insufficient instrumental, mostly, non-digital, assets. The academic novelty and originality of the paper stem from its research focus, as there is dearth of analytics on AI-related issues from the perspective of ASEAN and its member states. The author's attempt to fill this analytical gap presents a step forward in conceptualizing major political, security and economic developments in Southeast Asia and adds academic and practical value to ASEAN studies.

Keywords: *Cambodia, economic modernization, development gaps, digital projects and initiatives, Bakong, Artificial Intelligence, prospects*

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ПОЛИТИКА КАМБОДЖИ В ОТНОШЕНИИ ИСКУССТВЕННОГО ИНТЕЛЛЕКТА: ДВИЖУЩИЕ СИЛЫ, НАПРАВЛЕНИЯ, ПРОМЕЖУТОЧНЫЕ ИТОГИ

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Аннотация: Цель статьи состоит в определении степени успеха, достигнутого Камбоджой в развитии своей экосистемы искусственного интеллекта (ИИ), рассматриваемого сквозь призму ее состояния ее нецифровых активов как результата экономической модернизации, а также ее цифровых проектов и инициатив. Представив специфику камбоджийской парадигмы экономической модернизации и дав оценку достигнутым к настоящему времени результатам, статья анализирует основные проекты и инициативы Камбоджи в цифровой сфере, их достижения и недостатки, переходя к рассмотрению цифровых инструментов страны и потенциала их развития. С точки зрения автора, хотя Камбоджа уделяет пристальное внимание формированию своей национальной цифровой экосистемы, разрыв между состоянием ее нецифровых и цифровых инструментов (развитие первых заметно отстает от вторых) сужает ее пространство для маневра применительно к проведению комплексной политики в сфере искусственного интеллекта. Фундаментальная проблема, с которой сталкивается политика Камбоджи в отношении искусственного интеллекта, заключается не в неспособности ее руководства масштабно мыслить, а в недостаточных инструментальных, прежде всего цифровых, активах. Научная новизна и оригинальность подготовленной работы обусловлена ее исследовательским ракурсом, поскольку существует недостаток аналитической проработки вопросов, связанных с искусственным интеллектом, сквозь призму подходов к ним АСЕАН и ее стран-участниц. Попытка автора заполнить эту аналитическую лауну представляет собой шаг вперед в осмыслении основных процессов в сфере политики, безопасности и экономики на пространстве Юго-Восточной Азии, представляя собой научную и практическую «добавленную стоимость» в исследовании АСЕАН.

Ключевые слова: Камбоджа, экономическая модернизация, разрывы в уровнях развития, цифровые проекты и инициативы, законг, искусственный интеллект, перспективы

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For researchers specializing in the Artificial Intelligence (AI) field, Cambodia is something of a puzzle. On the one hand, it is an underdeveloped country that occupies low positions in most international non-digital rankings. On the other hand, however, the country demonstrates very good potential in digitalizing many of its economic and business processes, as well as pioneers many of advanced regional practices. To explore this contradiction and discuss its main implications is a timely and relevant exercise.

This task is all the more urgent since ASEAN's integration plans have become more ambitious since it announced the ASEAN Community 2045. Apart from other priorities, it aims to expand and deepen digital practices and eventually, establish "a leading and connected Digital and Technological Community"¹. Since all ASEAN countries are expected to contribute to achieving this goal, while the association is as strong as its weakest link, it is important to analyze the instrumental possibilities of its individual member states, including the Kingdom of Cambodia. The latter may well be an exemplary pattern of major problems the association will encounter in implementing in integration plans in the digital field.

Cambodia: Major Features of Economic Modernization

Cambodia is a country that is undergoing a profound and multi-directional transformation with potentially far-reaching economic and social implications. Its brief outline is presented below.

On the one hand, Cambodia has good growth and development potential due to its central location in Southeast Asia. As the country borders Thailand, Laos and Vietnam, it participates in numerous trans-boundary projects across the Indochina peninsula. No less importantly, Cambodia harbors ambitious plans regarding its internal development, as it aims to become an upper-middle income country and a high-income country by 2030 and 2050 respectively².

On the other hand, the country has to deal with numerous development challenges. Specifically, its internal territorial discrepancies matter strongly. There are huge gaps between urban and rural areas, as big cities like Battambang, Siem Reap, Sihanoukville and Kampong Cham enjoy revenues from the tourism industry, while rural territories remain in poverty. Additionally, while the share of urban population in the country rose from 19% to 41% between 2000 and 2024 respectively³, and cities are destinations of internal labor migration, most of these jobs are temporary and insecure. Lastly, economic activity in the country is not diversified. In fact, Cambodia's economy is driven by few sectors, mostly, garments, agriculture, tourism and

construction. Since recently, the country has encountered extra shocks, most importantly, property downturn (since 2023) and tariff wars (since 2025), in addition to negative economic aftereffects of border skirmishes with Thailand.

Cambodia's development projects and initiatives are exemplified by the Triangular Strategy (1998–2003), the Rectangular Strategy (2004–2023) and the Pentagonal Strategy (2023–2050). The Phase I of the Pentagonal Strategy is organized around five priorities: People, Road, Water, Electricity, and Technology. To clarify the latter point, “technology refers especially to digital technology to address the 4th Industrial Revolution and accelerate the digital transformation of Cambodia's economy and society, as well as to meet the needs for enhancing economic productivity”⁴.

Among notable developments that support this vision, the country's expanding trans-boundary cooperation is noteworthy. Located in the center of the Indochina peninsula, Cambodia has an access to the Gulf of Thailand, the Mekong River and the Tonle Sap Lake, which is behind its participation in many trans-boundary projects. Specifically, the Belt and Road Initiative (BRI) deserve mentioning. As Cambodia aims to expand China's support, mostly, to balance the influence of neighboring Thailand and Vietnam, co-operation with Beijing, especially concerning the construction of hydro-energy objects in the country, is highly appreciated by Phnom Penh. In light of this, it is noteworthy that China Huadian controls 40% of power generation in Cambodia⁵. Additionally, the country is part of the Greater Mekong Sub-region project focusing mostly on expanding trade and person-to-person exchanges, as well as on cooperation in the field of agriculture, within the Southern Economic Corridor. No less importantly, Cambodia participates in the Thailand Plus One initiative launched by Japan in order to stimulate co-operation between Japan's production facilities in Thailand and other Indochina states. Lastly, Cambodia is impacted on by Thailand's East Economic Corridor (EEC). To substantiate, the EEC stimulates FDI inflows, as Cambodia's SEZ bordering Thailand benefit from the spillover effect. Additionally, labor migration receives an impetus, as the EEC attracts Cambodia's person-power. Individually and collectively, these trends can be expected to intensify in a short-term and mid-term perspective.

Notwithstanding this, the implementation of these plans encounters serious problems. To start, Cambodia remains a backward agrarian country, as 59% of its population lived in the rural areas in 2024 (although this indicator decreased from 79% in 2010)⁶. Additionally, it has underdeveloped logistics, including railways and waterways. According to the Logistics

Performance Index 2023, Cambodia was below other ASEAN countries (except Laos) along multiple criteria⁷. Finally, it is difficult to take into consideration the interests of all the stakeholders, since national priorities can hardly be synergized with those of the country's corporate sector. To make matters worse, Cambodia's person-power becomes more expensive, as the minimum wages, especially in the manufacturing sector, are rising.

A point to be mentioned separately relates to a gap between the country's prospective plans and the skill level of its person-power. While Cambodia finds it increasingly difficult to rely upon its low-cost labor, its tools to educate its person-power remain ineffective. To exemplify, the country occupied 101st rank in Global Knowledge Index 2025 with the overall score 31.9 (out of 100)⁸. This is especially important since the corporate sector prefers to hire personnel with relevant skills, especially in the manufacturing and the service sector, rather than constantly pay for training its employees.

Lastly, Cambodia's national development strategy is yet to be synergized with ASEAN's integration policy, mostly, the ASEAN Economic Community and the Regional Comprehensive Economic Partnership. The evolution of this problem, as well as Cambodia's attempts to resolve it, will merit watching in the coming years.

Concerning the Cambodian corporate sector, its micro-, small and medium-sized enterprises (MSME) must be discussed individually. These economic and business agents play an important role in job creation in the country. According to available estimates, MSME made up 99.7% of Cambodian enterprises and employed around 60.8% of its person-power in 2022 (the latest figures available)⁹. Apart from it, MSME are the main source of income for poor and socially vulnerable citizens in the country. In these circumstances, it is especially discouraging that many MSME are mostly cash-based, and do not use digital tools in their commercial practices. Moreover, most of such companies do not skill-training programs for their employees and rarely look beyond the country's national borders (except those involved in trans-boundary apparel and textile production in neighboring Laos and Vietnam). Lastly, they do not obtain support from Cambodia Chamber of Commerce (the country's key government-business dialogue venue), as it works mostly with big companies. Individually and collectively, these factors decrease MSME potential as the country's growth driver.

All factors considered, it is fair to say that the country is encountering huge development challenges. In order to respond to them, it implements and upgrades numerous tools including those in the digital field. The latter deserve special attention.

Main Digital Initiatives and Their Limitations

Attaching profound importance to developing its digital tools, Cambodia undertakes numerous programs and initiatives aimed to increase its digital competitiveness. Among them, the following deserve attention.

Most notably, the National Digital Economy Policy and the Digital Economy Initiative were launched in 2016 and 2018 respectively. Both aim at improving the country's internet infrastructure and social services, as well as increasing the level of digital education of its person-power. Additionally, the Cambodia Digital Economy and Society Policy Framework 2021-2035 was launched in 2021. The project focuses upon several priorities, namely, to establish the foundations of digital infrastructure, develop digital regulation, promote digital upgrade of the public sector, support digital citizenship and advance the digital transformation of the corporate sector¹⁰. In its turn, Cambodia Digital Government Policy 2022-2035 aimed at building a comprehensive digital ecosystem around government services was adopted in 2022¹¹. Also, the Strategy for the Development of E-Services for Business that narrowly focuses on streamlining business services and building business-friendly ecosystem across the country deserve mentioning. Its expected results are enhanced operational efficiency, cost reduction, stronger production chains and improved market competitiveness. The Strategy is synergized with Cambodia Digital Economy and Society Policy Framework 2021-2025 and the Cambodia Digital Government Policy 2022-2035¹². This evidences that the country aims to build a comprehensive digital ecosystem rather than elaborate on narrow niche-orientated solutions.

Apart from the normative base, the institutional dimension of Cambodia's digital policy matters. In 2011, the country launched the Open Development Cambodia portal that gives an access to datasets operated by mostly government agencies, as well as provides public data sharing across the country. The ICT Federation of Cambodia, which works closely with the Ministry of Post and Telecom of Cambodia, was established in 2014 with the objective to contribute to the upgrade of the country's digital tools. Additionally, the platforms verify.gov.kh and the Digital Security Committee were set up in 2023 and 2024 respectively. The Digital Economy and Business Committee (launched in 2021) and the Digital Government Committee (launched in 2022) as supportive institutional tools are other cases in point. Collectively, these formats contribute to raising the efficiency of Cambodia's digital tools, to the best advantage of its overall competitiveness.

As it stands today, Cambodia pays close attention to enhancing the efficiency of its digital financial ecosystem. Specifically, fintech tools matter

strongly. The country has numerous advantages in developing these tools, namely, its young and technically-savvy population, government incentives to companies (like, for instance, Cambodia SME Scheme or Cambodia Micro Entrepreneurs Scheme), etc. Fintech-related examples include, but are not limited to, e-payments (Wing, ABA Pay, Pi Pay), food deliveries (Foodpanda), e-commerce (smileshop.com.kh) and digital education services (E-School Cambodia). A notable example relates to the digital support of government agencies, as a special online platform with access to various government services (like, for instance, paying fees and taxes) was launched in 2021.

Cambodia's central bank digital currency (CBDC) Bakong is another case in point. The National Bank of Cambodia launched Bakong in October 2020. As commented on by Chea Serey, Director General of NBC, the aims were "to improve financial inclusion, efficiency, efficiency, and safety, as well as promote the use of our local currency"¹³. It was followed by launching the unified QR code to support Bakong in 2022. Later on, the National Bank of Cambodia signed a Memorandum of Understanding with Alipay Connect, which will allow Bakong users to make payments in the Alipay system¹⁴. The National Bank of Cambodia extended cooperation in the digital field with other countries, including China, Singapore, Malaysia, the Philippines and South Korea with an objective to integrate their payment applications into Cambodian practices¹⁵. The Cambodia Blockchain Summit and the Fintech Revolution Summit, held in March and May 2025 respectively, further evidence that the country is serious about increasing its digital competitiveness by developing digital payment tools and expanding their functional coverage.

Notwithstanding these laudable developments, the unlocking of Cambodia's digital potential encounters serious obstacles. Although the country has succeeded in constructing the digital infrastructure (for instance, the 4G mobile network coverage embraced 94.7% of its population in 2025¹⁶), nevertheless, the internet connection remains unstable in its rural areas. Additionally, gaps in financial and digital literacy deserve mentioning, as many people in the country, especially those living in its rural areas, are short of knowledge and practical skills relevant to digital finance. More than that, cybersecurity threats matter strongly, as along with increasing economic and digital activity across the region, cybercrimes of all sorts have become rampant¹⁷. Lastly, the country has not yet elaborated on many of urgent regulatory issues, especially those relating to transboundary data transfers and

personal data protection. Specifically, Personal Data Protection Law and Cybersecurity Law are to be finalized yet.

In light of the afore-discussed factors, the assessment that Cambodia is actively developing its digital tools seems realistic. As compared to other ASEAN states, the country is leading digitalization-related trends in many areas rather than following them. Logically, the AI tools matter all the stronger in the country's priorities, as the economic and commercial feedback these tools promise is truly impressive.

The AI Connection

Aware of advantages that the Artificial Intelligence (AI) may bring to the overall national competitiveness, Cambodia strives to develop AI tools and implement them in its economic and commercial practices. As of March 2026, the country did not elaborate on a comprehensive National AI Strategy, and only niche-orientated documents specify the implementation of AI tools along selected tracks.

Concerning the AI usage in Cambodia, the key sectors include education, agriculture, fintech, and digital technology research, as well as tourism, especially with relevance to places of historical and cultural heritage. Geographically, the predominant part of this activity takes place in Phnom Penh, to a much lesser extent in Siem Reap¹⁸. At the same time, a significant part of the country, especially its rural areas, does not use AI tools.

Artificial Intelligence is necessary for performing large-scale national economic and social tasks like, for instance, improving farming, including crop monitoring and disease detection, creating new jobs, reducing waste and enhancing supply-chain efficiency. According to available estimates, AI tools can add from 3.35 billion dollars to 6.7 billion dollars to Cambodia's GDP by 2030¹⁹. For comparison, Cambodia's GDP at current prices was 46.0 billion dollars in 2024²⁰. In light of this, it is hardly surprising that the Cambodian leadership attaches much significance to AI tools due to the sizable economic and commercial opportunities these tools bring.

Despite persistent speculations on the AI and its virtues, the Cambodian government is encountering serious challenges. Notably, the country has problems with AI-related competences of its person-power. As demonstrated by the Government AI Readiness Index 2025 published by Oxford Insights, Cambodia remains behind other Asia-Pacific countries except Laos, Papua New Guinea, North Korea, Myanmar and Timor Leste. In 2025, the Cambodian score was 33.9, while the regional average and the world average scores were 50.3 and 42.5 respectively²¹. Additionally, the country

underperforms along many of the criteria of the Global Cybersecurity Index 2024, with Legal Measures being the only area of relative strength, while Technical, Organizational, Capacity Development, and Cooperation Measures outlined as areas of potential growth (or, putting it straightforwardly, areas of relative weaknesses)²².

No less revealingly, national energy infrastructure deficiencies are a serious problem. As data centers are energy hungry, while calculations based on big data increase in importance, Cambodia cannot implement its AI-related plans. Trying to cope with this challenge, the country turns to its partners, mostly, Japan and China, for help in constructing digital infrastructure, including data centers²³. It would not be bad if the country were not slipping into dependence upon external assistance.

A special vulnerability point relates to difficulties in adapting Khmer language to large language models. Additionally, although the country published Cambodia Digital Skill Development Road Map 2024-2035, national higher education institutions cannot synergize their curricular with market and industry demands, because of which, national companies heavily depends on expatriates. Both individually and collectively, these factors further decrease the efficiency of Cambodia's efforts to develop a comprehensive and effective national AI ecosystem.

Simultaneously, the Cambodian leadership cannot but realize that excessively active implementation of AI tools may be detrimental to the country's economic development. Prospects of significant job losses due to automation are clear²⁴, which may be aggravated greatly by AI tools. If so, the Cambodian leadership has to restrain from developing and implementing AI tools more extensively than it is necessary to perform ongoing, or even situational, tasks.

In sum, Cambodia's plans with regard to developing national AI ecosystem as a driver of its overall competitiveness has to be aligned with practical realities. The latter suggest that prospects are uncertain, if not gloomy. Realistically, the country has a long way to go to increase the efficiency of the AI tools at its disposal and build a comprehensive national ecosystem. Seen from the current perspective, this scenario is both distant and effort consuming with limited instrumental possibilities available.

Conclusion

The analysis of Cambodia's possibilities to develop its AI tools seen through the prism of the specifics of country's economic and social modernization and its digital dimension leads to several assessments.

At present, Cambodia is encountering a gap between the non-digital and digital directions of its policy. While in the former regard the country remains economically and socially backward, the latter are progressing actively. This gap becomes a serious shortcoming, as it represents an obstacle to developing the digital ecosystem in the country and is unlikely to be removed quickly even under the most optimistic scenario.

Another scenario, under which Cambodia will be able to resolve this problem by expanding cooperation with extra-regional partners, does not seem realistic either. On the contrary, foreseeable future trends suggest that the country may well slip into dependence on, for instance, China. In these circumstances, Cambodia is trapped in a vicious circle that has ample chances to undermine its competitiveness for years or even decades to come.

All factors considered, expectations that Cambodia will be able to develop its AI potential sufficiently for achieving even modest results must be kept low. Non-digital deficiencies are a ²⁵serious obstacle to the country's digitalization-related plans. Although factors that are currently difficult to predict cannot be excluded, conclusive evidence suggests that impressive breakthroughs in Cambodia's policy on building a comprehensive national AI ecosystem are hardly realistic.

ИНФОРМАЦИЯ ОБ АВТОРЕ

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