

BAD DEBT MANAGEMENT OF COMMERCIAL BANKS IN VIETNAM DURING THE POST COVID-19 PERIOD

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Abstract: This article provides an overview of the current situation of bad debts and the measures taken by the banking system to tackle bad debts in the period of 2020-2022, a time heavily impacted by the Covid-19 pandemic for both commercial banks and the entire economy. Consequently, it proposes solutions to enhance the current management of bad debts for Vietnamese commercial banks.

• Keywords: commercial banks, state bank, bad debts, debt restructuring, bad debt resolution.

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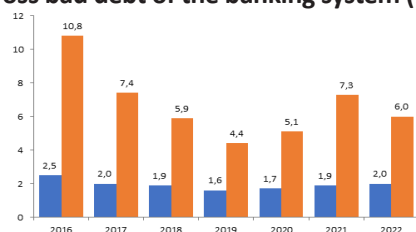
Introduction

From 2020 to 2022, the Covid-19 pandemic had various adverse effects on the business activities of commercial banks, as well as economic growth. Many measures to control and resolve bad debts were implemented, particularly debt restructuring and maintaining debt groups as guided by the State Bank of Vietnam (SBV). Thanks to these efforts, bad debts and the bad debt ratio of the system, while increasing, still remained within the permissible limits set by the SBV. However, currently, potential bad debts have become a concern for Vietnamese commercial banks. As the solutions for debt restructuring and maintaining debt groups recommended by the SBV expire, coupled with the sluggish recovery of the economy, commercial banks may face a significant increase in bad debts. This reality demands that commercial banks take even more proactive steps in managing bad debts based on their capacities.

Research content and results

1. The Situation of Bad Debts in the Banking System during the Period of 2020-2022

Figure 1. Ratio of on-balance sheet bad debt and gross bad debt of the banking system (%)



Source: Compiled from banks' annual report for the period of 2016-2022

In 2020, Vietnam's economy and its banking sector faced the negative impacts of the Covid-19 pandemic for the first time. The situation of domestic and global isolation due to the pandemic created significant

challenges for business operations. In 2020, it marked the moment when the bad debt ratio started to rise again, following two phases of bank restructuring that had led to a continuous decrease in bad debt ratios. The bad debt ratio within the entire system reached 1.7%, and in 2021 and 2022, it correspondingly increased to 1.9% and 2%.

Analyzing each individual bank, in 2020, among the 27 banks for which data were collected, only 3 banks exceeded the safe threshold for bad debts as regulated by the State Bank of Vietnam (SBV). In 2021, 19 out of 27 banks experienced an increase in bad debts. Among them, many banks saw a substantial rise in the scale of bad debts, such as Vietinbank (with bad debts increasing by 49% compared to 2020), Techcombank (up by 77%), VPBank (up by 60%), and ACB (up by 52%). Some banks even saw their bad debts surge by over 100% (Nam A Bank increased by 117%, NCB increased by 105%)...

However, when considering the ratio of bad debts, in 2021, only 12 out of 27 banks experienced an increase in their bad debt ratios. The remaining banks either saw a reduction in bad debt ratios or no change at all. Remarkably, only two banks exceeded the safe threshold for bad debts (BIDV and VPBank), and these were the same two banks with high bad debt ratios in 2020. This indicates that the control of bad debts by commercial banks, based on the government and SBV's intervention measures, was timely and effective in the context of the pandemic situation.

In 2022, although the global and domestic pandemic situation began to be gradually brought under control, the negative impacts of the pandemic still heavily affected businesses and the economy. The incidence of bad debts and the bad debt ratio for many banks continued to increase. The internal bad debt ratio for the entire system

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rose from 1.7% to 1.9%. Among the 27 banks from which data were collected, most banks experienced an increase in the scale of bad debts (with the exception of three banks, namely Bac A Bank, VietAbank, and Sacombank, which saw a reduction in the scale of bad debts).

According to the data collected, NCB bank witnessed a record increase in bad debts, soaring by 585%. Techcombank and VPBank remained the banks with the highest increases in the scale of bad debts in 2022. In terms of bad debt ratios, only Techcombank and NCB had concerning ratios, especially NCB with a bad debt ratio of 17.93%. The majority of other banks, while experiencing an increase in bad debt ratios, saw relatively modest rises that stayed within the SBV's permissible limits.

This analysis indicates that, fundamentally, the internal bad debt ratios of most banks continued to increase but remained within the allowable limits during the 2020-2022 period. However, when considering both internal bad debts and those sold to the Vietnam Asset Management Company (VAMC) that have not yet been resolved, along with potential hidden bad debts from debt restructuring (consolidated bad debts), the bad debt ratio is significantly higher than the published internal bad debt ratio. The consolidated bad debt ratios for banks were 5.1% (3 times higher than the internal bad debt ratio), 7.3% (3.8 times higher than the internal bad debt ratio), and 6% (3 times higher than the internal bad debt ratio) during the 2020-2022 period. Although these consolidated bad debt ratios are much higher than the internal bad debt ratios in the 2020-2022 period, they are still lower than those in 2016-2017 (the period before the implementation of bad debt resolution under Resolution 42/2017/QH 14).

Table 1. Bad debt and bad debt ratio of some Vietnamese commercial banks period 2020-2022

Ngân hàng	Số xấu				Tỷ lệ nợ xấu (%)			
	2020	2021	2021/2020	2022	2022/2021	2020	2021	2022
BIDV	21,639	13,245	-38%	17,622	30%	3.41	4.47	1.16
Agribank	25,717	28,728	11.7%	34,778	21.10%	1.64	1.71	1.64
Vietcombank	9,597	14,300	49%	15,706	10%	0.95	1.96	1.24
VCB	5,230	6,121	17%	7,808	28%	0.62	0.64	0.68
MB	3,248	3,268	1%	5,030	54%	1.09	0.9	1.09
Techcombank	1,295	2,294	77%	3,818	66%	0.47	0.66	0.66
VPBank	9,924	16,244	60%	25,137	55%	3.41	4.47	5.73
ACB	1,840	2,799	52%	3,045	9%	0.59	0.77	0.74
Sacombank	5,780	5,721	-1%	4,299	-25%	1.70	1.47	0.98
SHB	5,599	2,915	-48%	9,740	59%	1.83	0.8	2.53
HDBank	2,357	3,360	43%	4,404	31%	1.32	1.65	1.67
VI	2,957	4,670	58%	5,687	22%	1.74	2.32	2.45
TPBank	1,420	1,157	-19%	1,357	17%	1.18	0.82	0.84
LienVietPostbank	2,527	2,775	10%	3,427	20%	1.43	1.33	1.49
ScA Bank	2,022	2,105	4%	2,460	17%	1.86	1.65	1.6
MSB	1,558	1,769	14%	2,055	16%	1.96	1.74	1.7
OCB	1,508	1,350	-11%	2,671	98%	1.69	1.32	2.23
Eximbank	2,534	2,247	-11%	2,347	4%	2.52	1.96	1.8
Nam A Bank	744	1,613	117%	1,611	0%	0.83	1.57	1.35
ABBank	1,324	1,423	7%	2,366	46%	2.09	2.06	2.88
Bac A Bank	628	655	4%	500	-24%	0.79	0.77	0.53
VietABank	1,112	1,012	-9%	955	-7%	2.30	1.86	1.53
KienLongBank	1,883	726	-61%	845	16%	5.42	1.89	1.89
Bản viết	1,111	1,176	6%	1,419	21%	2.79	2.53	2.79
NCB	609	1,249	105%	8,556	585%	1.51	3	17.93
PG Bank	626	617	-1%	745	7%	2.44	2.24	2.56
SaigonBank	223	325	46%	398	22%	1.44	1.97	2.12

Source: Compiled from banks' annual report for the period of 2020-2022

One concerning issue is that the bad debt ratio of 2022 increased at a significantly higher rate compared to the lending growth rate. Additionally, bad debts in category 5 (potentially irrecoverable debts) increased at most banks, with some experiencing substantial

increases, such as NVB bank (up by 605.71%), VPBank (259.84% increase), MBB (179.85% increase), SHB (116.82% increase) and others.

Table 2. Classification of loan quality of banks as of December 31, 2022 (Billion VND)

Ngân hàng	Phân loại nợ xấu 31/12/2022					Nợ xấu	Dư nợ cho vay	Tỷ lệ nợ xấu/Dư nợ				
	Nhóm 3	Nhóm 4	Nhóm 5	Nhóm 6	Nhóm 7			31/12/2022	31/12/2021			
NVB	1,028	4,248	3,281	70,43	2,240.15	605.71	8,556	584.83	47,722	14.68	17.93%	3.00%
VPB	7,945	10,031	7,160	19,26	33.13	249.84	25,137	54.75	438,338	23.38	5.73%	4.57%
VIB	162	327	1,815	(44.94)	(64.70)	96.84	2,324	25.97	63,833	25.93	3.85%	3.65%
BaoVietBank	254	109	746	35.91	(28.70)	(17.60)	1,109	(11.09)	33,196	31.53	3.34%	4.94%
ABB	541	421	1,404	61.59	0.50	62.61	2,366	46.32	82,011	18.88	2.88%	2.34%
BVB	149	408	862	(20.25)	119.79	4.54	1,419	20.63	50,859	9.64	2.79%	2.53%
PGB	62	119	563	(29.13)	(2.53)	16.40	16.40	7.29	29,051	5.64	2.56%	2.52%
SHB	1,522	1,845	6,574	2.84	2.72	116.82	9,740	59.35	385,633	6.41	2.53%	1.69%
VIB	1,541	1,710	2,436	(11.82)	6.61	84.70	5,887	21.77	231,944	15.10	2.45%	2.32%
OCB	671	626	1,375	105.70	115.43	87.52	2,671	97.92	119,803	17.40	2.23%	1.32%
SCB	76	87	234	82.52	(18.01)	32.33	398	22.33	18,714	13.40	2.12%	1.97%
KLB	75	122	648	(23.49)	27.18	21.79	845	16.37	44,703	16.45	1.89%	1.89%
EIB	265	451	1,632	(18.86)	(20.20)	20.27	2,347	4.42	130,506	13.81	1.80%	1.90%
MSB	612	440	1,005	77.30	(6.31)	5.33	2,057	16.28	120,644	18.79	1.70%	1.74%
HDB	1,848	1,415	1,141	15.48	61.09	29.48	4,404	31.07	263,856	29.84	1.67%	1.65%
SBB	454	220	1,787	31.27	(33.80)	25.19	2,460	16.89	153,956	20.67	1.60%	1.65%
VAB	13	31	911	(88.07)	433.76	0.05	955	(7.86)	62,508	14.78	1.53%	1.89%
LPB	1,070	1,005	1,353	132.39	(6.08)	1.43	3,427	19.62	295,507	12.71	1.46%	1.37%
NAB	160	132	1,320	(50.31)	(31.54)	20.10	1,611	(0.12)	119,538	16.45	1.35%	1.57%
CTG	7,305	2,256	6,235	2.95	12.62	19.86	15,796	10.46	1,274,822	12.75	1.24%	1.26%
BID	3,219	2,643	11,760	16.75	(24.61)	61.47	17,622	30.09	1,522,229	12.37	1.16%	1.00%
MBB	1,517	1,221	2,293	5.84	20.26	179.85	5,031	53.95	460,574	26.69	1.09%	0.90%
STB	561	731	3,007	(0.60)	8.04	(32.88)	4,299	(24.86)	438,628	13.07	0.89%	1.47%
TCB	1,686	1,151	1,000	148.55	31.49	32.42	3,818	66.42	420,524	21.07	0.91%	0.69%
TPB	385	467	505	(24.58)	33.85	89.93	1,357	17.34	169,993	14.00	0.84%	0.82%
ACB	442	437	2,165	(17.76)	(50.43)	56.98	3,045	8.77	411,658	26.26	0.78%	0.78%
VCB	406	772	6,597	(45.41)	(20.07)	49.55	7,775	27.02	1,136,204	18.26	0.68%	0.64%
BAB	39	44	416	(35.94)	10.79	(24.93)	500	(23.77)	94,121	11.26	0.53%	0.77%

Source: VietstockFinance

2. The current state of bad debt management in commercial banks during the 2020-2022 period

Immediately after the outbreak of the pandemic, significantly impacting the business operations of enterprises, the banking sector promptly implemented various measures. From 2020 until now, the State Bank of Vietnam (SBV) continuously issued and implemented circulars allowing Credit Institutions (CIs) to restructure loan repayment terms, exempt, reduce interest rates, fees, and maintain debt groups to support customers affected by the Covid-19 pandemic (Circular No. 01/2020/TT-NHNN dated March 13, 2020, Circular No. 03 amending some provisions of Circular No. 01/2020/TT-NHNN dated April 2, 2021, Circular No. 14/2021/TT-NHNN amending and supplementing some provisions of Circular No. 01/2020/TT-NHNN). These circulars provided a legal framework for CIs to restructure loan repayment terms, exempt, reduce interest rates and fees, and maintain debt groups, thereby alleviating difficulties for borrowing customers affected by the Covid-19 pandemic across all industries and sectors, creating a legal corridor and breakthrough mechanism for CIs to resolve capital borrowing difficulties for customers.

Based on the SBV's operational measures, as of December 31, 2021, CIs had restructured loan repayment terms, maintained debt groups, with an accumulated loan value of approximately 607,000 billion VND since the outbreak of the pandemic. Currently, there are approximately 775,000 affected customers who have had their debts restructured, with a total outstanding debt of over 296,000 billion VND. Additionally, interest rates have been waived, reduced, or lowered for over 1.96 million affected customers, with

a total accumulated interest amount waived, reduced, or lowered for customers of approximately 34,900 billion VND. In addition, new loans have been provided with lower interest rates compared to pre-pandemic levels, with a cumulative volume from January 23, 2020, to the end of December 2021, reaching over 7.4 million billion VND for approximately 1.3 million customers.

As of the end of June 2022 (the end of the policy period), credit institutions had implemented the restructuring of loan repayment terms and maintained debt groups with an accumulated loan value of 722,334 billion VND for over 1 million customers.

In parallel with the debt restructuring measures as per SBV regulations, commercial banks proactively set aside risk provisions to handle arising credit risks. The coverage ratio of bad debts for the CI system was high and increased in 2020-2021 (the coverage ratios for bad debts in 2020-2021 were 105% and 141%, respectively). In 2022, although the coverage ratio for bad debts decreased compared to 2021, it remained higher than in 2020 and previous years (Figure 2).

Figure 2. Bad debt coverage ratio of the system of credit institutions (%)



Source: SBV

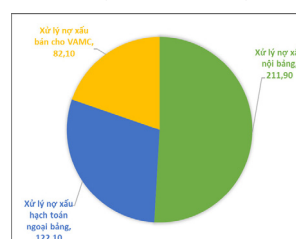
It is worth noting that some banks have actively and proactively set aside risk provisions for all restructured debts ahead of schedule, such as Vietcombank and BIDV. The consolidated bad debt coverage ratio has reached record levels at some banks, such as VCB (achieving 424% in 2021 and 317% in 2022), BIDV (reaching 219% in 2021 and 245% in 2022), ACB (achieving 210% in 2021 and 155% in 2022), and so on. This enhances the overall system's resilience against unforeseeable pandemic developments.

However, despite the relatively high bad debt coverage ratios of banks, this is not necessarily an entirely positive sign. This is because the bad debt coverage ratio is calculated based only on internal bad debts, without accounting for bad debts sold to VAMC that have not been resolved, and potential hidden bad debts from debt restructuring. Additionally, there is a possibility of transitioning debts from groups 1 and 2 to bad debts due to unfavorable business conditions for enterprises in the near future.

In addition to implementing preventive measures and constraints on bad debts, banks are also actively taking

measures to address bad debts. During the period of 2020-2022, the handling of bad debts arising before August 15, 2017, and bad debts arising within the effective period of the resolutions of Credit Institutions (CIs) continued to be carried out in the spirit of Resolution 42/2017/QH14 and Resolution No. 63/2022/QH15 (extending the application period of all provisions of Resolution No. 42/2017/QH14 of the National Assembly on the pilot resolution of bad debts of CIs from August 15, 2022, to the end of December 31, 2023). As of early 2023, CIs have processed 416.1 trillion VND, including 211.9 trillion VND of internal bad debts, 122.1 trillion VND of internal bad debts accounted for, and sold to VAMC 82.1 trillion VND (Figure 3).

Figure 3. Cumulative results of bad debt handling according to Resolution No.42 until January 2023 (Trillion VND)



Source: SBV

More than half of the bad debts have been handled through methods such as customers repaying their debts, credit institutions accepting collaterals in lieu of debt repayment, and selling or auctioning off collaterals. However, during the 2020-2022 period, the pace of bad debt resolution according to Resolution 42 slowed down. If we calculate from August 15, 2019, to December 31, 2019, the total amount of bad debts processed was 305.7 trillion VND, averaging about 10.5 trillion VND per month for the entire system. In contrast, the amount of bad debts processed during the 2020-2022 period was 110.4 trillion VND, averaging over 3 trillion VND per month, significantly lower than the period before the pandemic.

3. Solutions to Enhance Bad Debt Management for Vietnamese commercial banks in the coming time

The risk of increasing bad debts has been forecasted since the beginning of 2023, given the global economic downturn, slower economic growth in Vietnam, narrowed production and business conditions, and enterprises facing many difficulties. Additionally, a significant amount of bad debt has been "hidden" through a circular that allows Credit Institutions to restructure repayment terms and keep the debt category unchanged to support customers facing difficulties. Therefore, in the coming period, Credit Institutions need even more proactive solutions to manage bad debts. Specifically:

Continue to implement measures to increase credit growth alongside prevention, minimizing the occurrence of bad debts, and improving the quality of credit.

Up to now, the profits of Vietnamese Credit Institutions still largely depend on net interest income from capital mobilization and lending activities. Therefore, promoting credit growth is the general direction of Credit Institutions, with the aim that businesses recover and develop, enabling Credit Institutions to achieve their operational goals. Hence, commercial banks also need to establish policies for businesses to have convenient access to credit. The current credit policy must create favorable conditions for businesses and individuals to access bank credit. Continue to implement, with the highest determination, the policy of supporting interest rates at 2% for enterprises, cooperatives, and individual businesses in certain industries and sectors according to Decree 31/2022 of the Government.

However, creating opportunities for businesses to access credit to recover after the pandemic does not mean that Credit Institutions will pursue credit growth at any cost, especially in the context where Credit Institutions are burdened with accumulated bad debts from the period before the pandemic and bad debts arising from the negative impact of the pandemic. Banks still have to ensure safe and effective credit operations, tightly control credit in potential risk areas, and have policies to screen customers that are suitable for each period. Banks must comply with the credit conditions of support policies as regulated by law, resolutely not lowering credit standards or loosening lending conditions, because chasing short-term net interest income will potentially lead to bad debts later. This is also an appropriate time for banks to re-screen their customer portfolios to select customers who are sincere, honest, and have a healthy financial situation.

Evaluate the quality and recovery capacity of debts to implement appropriate measures of debt settlement.

Banks must proactively and resolutely control credit quality, closely monitor customers, assess their repayment capacity, classify customers appropriately, and minimize the occurrence of bad debts. Additionally, they should proactively handle recovery, closely monitoring the customer portfolio structure according to Circular 01/2020/TT-NHNN and related documents (Circular 03/14). Banks should actively increase risk provisions for bad debts, debts with the potential to turn bad, and classify customers into higher-risk debt groups based on the actual status of the debt. Moreover, banks need to assess the recovery level of each sector after the pandemic to establish suitable lending policies for customers.

Banks should build and implement a management system, and monitor, and evaluate it in line with the

bank's operational situation and orientation. They should thoroughly research the portfolio of bad debts and the causes of bad debts to develop effective handling methods and policies to screen customers suitable for each period.

Banks should focus on classifying customers based on their willingness to cooperate and the source of debt repayment from customers to apply appropriate debt handling measures. For customers facing difficulties in production and business activities but still have the ability to recover, banks should coordinate with customers to restructure debts. This may involve extending repayment periods, adjusting repayment terms, and considering interest waivers or reductions, while lowering interest rates for loans in a reasonable manner to help customers overcome financial difficulties. For customers with reduced repayment capacity and also difficult to recover, banks must quickly develop a negotiation plan. This might include negotiating the handling of collateral or mediating in court to shorten the litigation period, aiming to minimize credit losses.

Banks should proactively implement the provisioning and use of risk provisions to handle bad debts in accordance with legal regulations and the actual risk situation.

Credit risk provisions serve as a financial cushion for bad debts within Credit Institutions. The establishment of these provisions aims to ensure the stability and sustainability of a bank's business operations, preparing for worst-case scenarios such as customers being unable to repay their debts or not adhering to repayment schedules. This practice is not just a prudent measure for individual banks; it is also a mandatory requirement for safe operation, as stipulated by regulatory authorities like the State Bank of Vietnam.

Since 2020, the State Bank of Vietnam (SBV) has issued several directives allowing Credit Institutions to restructure debts for customers facing pandemic-related difficulties, keeping them in their original debt categories. However, these measures are temporary and urgent, designed to alleviate immediate business challenges. Ultimately, the risks associated with these debts still fall on Credit Institutions. In addition to meeting prerequisite conditions for debt restructuring that signal operational recovery capabilities, Credit Institutions must proactively set aside credit risk provisions based on the actual risk level. Despite current regulations specifying the minimum provision for restructured debts, as mandated by the SBV, Credit Institutions that haven't adequately prepared for credit risk provisioning may need to allocate these provisions in the near future. Therefore, in 2023-2024, depending on their financial capacity, Credit Institutions should proactively allocate provisions for both restructured

debts that haven't been recognized as bad debts and to prevent a situation where bad debts worsen. This is crucial to avoid financial shocks to Credit Institutions in the future, even though increasing provisions will directly impact the bank's profit.

Continuing the restructuring process linked to bad debt resolution in the 2021-2025 period and implementing measures to enhance the financial capacity of commercial banks.

On June 8, 2022, the Prime Minister issued Decision No. 689/2022/QĐ-TTg, approving the plan "Restructuring the system of credit institutions associated with bad debt resolution in the 2021-2025 period." Therefore, starting in 2012, this marks the approval of the third plan. While the restructuring process of the banking system in the 2011-2020 period achieved some remarkable successes, such as no bank failures, ensured payment ability, and tightened discipline in banking operations, fundamental goals of restructuring, such as permanently resolving bad debts and creating a truly healthy banking system according to international standards with a diverse ownership structure based on advanced technology, have not been fully addressed.

In line with the government's direction, Credit Institutions continue to develop and implement the restructuring plan for the third phase to enhance risk resilience and control bad debts. Depending on specific conditions, Credit Institutions should devise and implement suitable measures, including increasing charter capital, raising capital adequacy ratios to strengthen financial capacity and ensure banking operation safety, as well as enhancing credit quality.

Effectively implementing bad debt resolution measures.

A concerning issue for banks in recent times has been the increasing trend of bad debts, which is projected to continue in 2023-2024. The persistence of bad debts makes it difficult for Credit Institutions to have enough resources to invest in technology, improve service quality, reduce lending interest rates, and keep credit risk within permissible limits. Therefore, to expand the credit scale and improve credit quality, a necessary measure that commercial banks must continue to implement is to address the bad debts that they are holding.

Firstly, Credit Institutions should continue to review and clearly identify the status of bad debts of the bank in accordance with the spirit of Resolution 42/2017/QH 14 and restructured debts affected by the pandemic to apply appropriate measures to handle bad debts. For businesses with feasible production and business plans, and assessed as having the ability to repay according to the restructuring plan, the bank may consider allowing

debt restructuring. This measure helps businesses rearrange their sources of debt repayment based on factors affecting their cash flow for debt repayment. Based on debt classification, banks need to make efforts to increase risk provision and use risk provisions to handle bad debts.

In addition to internal measures for bad debt resolution, Credit Institutions need to continue reviewing eligible Group 5 bad debts for sale to VAMC. To carry out debt sales, banks should compile information on bad debts and customer borrowing for the debts that the bank proposes VAMC to purchase. Following the guidance of the asset management company of credit institutions, Credit Institutions should promptly complete the procedures to propose debt purchases. Banks still need to regularly report to VAMC on the application plan, progress, and results of recovering the bad debts sold to VAMC. Additionally, banks need to cooperate with VAMC to agree on measures to overcome difficulties and issues in handling bad debts and collateral assets of the debts sold to VAMC. Actively seek partners to buy debts for the debts sold to VAMC and be authorized by VAMC to sell debts. Focus resources to expedite the provision process for bad debts sold to VAMC, paid with special bonds, to carry out early or on-time bond settlement as prescribed. Currently, many bad debts sold to VAMC have reached the time for repurchase, so banks should proactively carry out the repurchase as previously committed.

Lastly, credit Institutions must actively coordinate with local authorities and competent state agencies, especially the police, courts, and enforcement agencies at all levels during the process of bad debt recovery, and collateral assets handling to maximize the recovery value of secured assets and bad debts.

Conclusion

Non-performing loans are one of the negative factors affecting the operations of commercial banks, especially in Vietnam where credit still accounts for the highest proportion of total assets, providing the largest source of income for banks. Therefore, to develop safely and efficiently, commercial banks need solutions to enhance the management of non-performing loans, especially in the context of numerous negative impacts causing an increasing trend in non-performing loans in banks at present.

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Thông tư 01/2020/TT-NHNN

Thông tư 03/2021/TT-NHNN

Thông tư 14/2021/TT-NHNN

Thông tư 02/2023/TT-NHNN