

Regulation Summary - July 2025

General Corporate

1. Draft Regulation of the Minister of Investment and Downstream Industry/Head of the Investment Coordinating Board on Guidelines and Procedures for the Organization of Risk-Based Business Licensing and Investment Facilities Through the Online Single Submission (OSS) System

Enforcement Date: -

Summary:

- If this new Draft Regulation is ultimately enforced, then business actors will be required to submit a significantly broader set of data when applying for Risk-Based Business Licenses (*Perizinan Berusaha Berbasis Risiko* – “PBBR”). The Draft Regulation also introduces specific procedures for technical approvals, which must accompany Environmental Approvals (*Persetujuan Lingkungan*).
- While the three core licensing requirements (e.g. Conformity of Spatial Utilization Activities [*Kesesuaian Kegiatan Pemanfaatan Ruang*]) have been retained under the new framework, the Draft Regulation now emphasizes stricter compliance by businesses that operate within forest areas. Specifically, nine criteria will now be used to determine significant environmental impacts that require Environmental Impact Assessments (*Analisis Mengenai Dampak Lingkungan Hidup/AMDAL*). Moreover, businesses may simultaneously apply for technical approvals alongside their Environmental Approvals (*Persetujuan Lingkungan* – “PL”) applications under certain conditions (i.e. if environmental carrying capacity and assimilative capacity assessments have been drafted and waste is managed internally).
- A notable shift in the available investment facilitation services has also been proposed. Whereas Regulation 4/2021 focused on immigration-related recommendations, the Draft Regulation is set to broaden the prevailing framework to include green lane service access and re-exports of duty-free machinery, as well as transfers of capital goods/materials that are utilized in relation to power generation and mining. Full implementation of this new framework is being targeted for 5 October 2025.

Banking

2. Circular of the Financial Services Authority No. 14/SEOJK.03/2025 on the Implementation of Governance by Commercial Banks

Enforcement Date: 24 June 2025

Summary:

- Conventional Commercial Banks (*Bank Umum Konvensional* – “**BUK**”), Sharia Commercial Banks (*Bank Umum Syariah* - “**BUS**”) and Sharia Business Units (*Unit Usaha Syariah* - “**UUS**”) (collectively referred to as “**Banks**”) are required to implement periodic self-assessments as part of their efforts to ensure the application of Good Corporate Governance. Said periodic self-assessments now cover a total of 16 indicators that will be assessed, including the management of conflicts of interest, the implementation of relevant functions (e.g. compliance, internal and external audits) and sustainable finance. For BUS and BUK that operate UUS, the performance of their Sharia Supervisory Boards must also be included as assessment indicators.
- In order to ensure transparency and fairness during all decision-making processes, Banks must now implement stricter measures regarding the prevention and management of any conflicts of interest, particularly during related party transactions. Parties that have a special relationship with Banks fall under eight criteria, including: 1) Majority shareholders in Banks; 2) Parties that control or that are controlled by Banks; 3) Companies that are affiliated with Banks; 4) Parties who have family relationships up to the second degree with the relevant Bank’s management; and so forth.
- Furthermore, Banks are now required to establish policies and procedures that address the conducting of transactions with the aforementioned related parties. Said policies and procedures must cover certain specific aspects at the least, including a clear definition of related parties, the scope of transactions, the application of the arm’s length principle, exposure limits and the applicable reporting mechanism.

3. Circular of the Financial Services Authority No. 15/SEOJK.03/2025 on the Application of Governance by Sharia Rural Banks

Enforcement Date: 30 June 2025

Summary:

- This Circular outlines the scope of implementation of good corporate governance for Sharia Rural Banks (*Bank Perekonomian Rakyat Syariah* – “**BPRS**”), which comprises 12 aspects that include: 1) Shareholder aspects; 2) Application of the compliance, audit and risk management functions; 3) Mitigation of any conflicts of interest; 4) Limits on BPRS fund disbursement; and 5) Information technology (“**IT**”) systems and reporting integrity. In comparison with the now-revoked Circular of the Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”) No. 13/SEOJK.03/2019, which

was subsequently amended by Circular of the OJK No. 9/SEOJK.03/2022 (collectively referred to as “**Circular 13/2019**”) as the previous framework that addressed the governance of sharia rural banks (*Bank Perekonomian Rakyat Syariah* – “**BPRS**”), the implementation of good corporate governance by BPRS, as outlined in the points above, did not previously feature.

- In terms of the shareholder aspects listed in point (1) above, this Circular mandates that any composition of shareholders must include at least one controlling shareholder who holds a minimum shareholding percentage of 25%. Moreover, this Circular also mandates that BPRS establish dedicated sets of procedures for dividend sharing that are in line with relevant Laws and Regulations and that take into account capital adequacy and BPRS development projections.
- Meanwhile, in terms of IT systems and reporting integrity, this Circular mandates that BPRS establish financial and non-financial reporting systems that are supported by adequate information management systems, including competent human resources. The ultimate goal in this regard is to produce reports that are transparent and that are characterized by high levels of integrity.
- Additionally, this Circular also requires BPRS to establish and implement a wide range of written policies and procedures that address the management of any risks that are inherent to new products and activities. Finally, under the Circular, BPRS are also required to implement anti-fraud strategies and to submit regular anti-fraud strategy reports, as well as initiate incident-based reporting in response to any events of fraud that have a significant impact.

Capital Market

4. Regulation of the Financial Services Authority No. 13 of 2025 on the Internal Control and Conduct of Securities Companies Engaged in Underwriting and Brokerage Activities

Enforcement Date: 11 December 2025

Summary:

- This Regulation introduces a number of new requirements for securities companies that operate as Securities Underwriters (*Penjamin Emisi Efek* – “**PEE**”) regarding the establishment and implementation of various specific internal functions (e.g. risk management, bookkeeping and compliance). It should be noted that the required functions differ depending on whether companies operate solely as PEE or also simultaneously as Securities Brokers (*Perantara Pedagang Efek/PPE*).

- This Regulation also contains more detailed provisions on the management of conflicts of interest and outlines a number of specific steps that must be taken by PEE, including: 1) Must complete processes of due diligence in relation to issuers and/or issuers of Debt Securities and/or Sukuk (*Efek Bersifat Utang dan/atau Sukuk Tanpa Penawaran Umum/EBUS*); 2) Must determine securities pricing; and 3) Must allocate securities.
- In addition, this new framework introduces various internal control and conduct requirements that apply to a new securities company type known as Regional Securities Companies (*Perusahaan Efek Daerah/PED*). These companies are established in order to serve investors within specific provinces and are required to implement at least seven internal functions (e.g. risk management and compliance).

5. Decree of the Board of Directors of PT Kustodian Sentral Efek Indonesia No. KEP-0023/DIR/KSEI/0725 on the Mandatory Utilization of Single Investor Identification (SID) by Financial Derivatives Customers

Enforcement Date: 7 July 2025

Summary:

- This Decree officially addresses the mandatory utilization of Single Investor Identification (“**SID**”) by financial derivatives customers (“**Customers**”). Said SID utilization is in line with the framework of Regulation of the Financial Services Authority (*Otoritas Jasa Keuangan/OJK*) No. 1 of 2025, which mandates that all Customers that have yet to secure such identification be issued with SID by financial derivatives broker-dealers.
- The issuance of SID involves relevant parties becoming users of the Know Your Customer (“**KYC**”) Administration Service (*Layanan Administrasi Prinsip Mengenal Nasabah – “LAPMN”*) through the signing of LAPMN Service Agreements (*Layanan Administrasi Prinsip Mengenal Nasabah – “LAPMN”*) with PT Kustodian Sentral Efek Indonesia as the LAPMN administrator.

6. Draft Regulation of the Financial Services Authority on the Application of Integrated Governance by Financial Holding Companies

Enforcement Date: -

Summary:

- If it is ultimately enforced, then this Draft Regulation will mandate that Financial Holding Companies (*Perusahaan Induk Konglomerasi Keuangan – “PIKK”*) must implement integrated governance

comprehensively and effectively across all of their various business activities. This requirement is being introduced in response to the growing complexity and diversity of the financial services industry, as well as to solidify the strategic role of PIKK in ensuring that all entities within a given conglomerate adhere to principles of sound governance.

- In terms of transparency, the Draft Regulation will require all members of boards of directors and boards of commissioners to disclose any share ownership that amounts to 5% or more, as well as any financial and familial relationships up to the second degree. Said disclosures should be incorporated into governance reports.
- The Draft Regulation also mandates that PIKK establish several different types of committees in order to support effective governance, including: 1) Board of Directors' Committees: specifically an Integrated Risk Management Committee and an Integrated Investment/Credit/Financing Policy Committee; and 2) Board of Commissioners' Committees: specifically an Integrated Governance Committee, an Integrated Audit Committee, an Integrated Risk Oversight Committee and an Integrated Remuneration and Nomination Committee at the least.

7. Draft Regulation of the Financial Services Authority on Collective Investment Contract-Based Mutual Funds Traded Through the Stock Exchange with Underlying Assets in the Form of Gold

Enforcement Date: -

Summary:

- The Draft Regulation stipulates that Collective Investment Contract (*Kontrak Investasi Kolektif* – “**KIK**”)-based mutual funds whose units are traded through the stock exchange and backed by gold as the underlying asset must comply with the following provisions: 1) Must adhere to general provisions on KIK; 2) Must comply with specific provisions on KIK whose units are traded through the stock exchange; and 3) Must ensure that all contracts contain a set of minimum required clauses (e.g. name and address of the relevant custodian bank).
- KIK-based mutual funds whose units are traded through the stock exchange and that are backed by gold as an underlying asset must be dissolved under the following conditions: 1) An order is issued by the Financial Services Authority (*Otoritas Jasa Keuangan*/OJK); or 2) Based on an agreement between an investment manager and custodian bank to dissolve the relevant fund, provided that approval has been obtained from all unit holders.

Employment

8. Regulation of the Minister of Manpower No. 3 of 2025 on the Amendment to Regulation of the Minister of Manpower No. 7 of 2021 on Procedures for Participant Registrations and Contribution Re-composition under the Unemployment Insurance Program

Enforcement Date: 7 February 2025

Summary:

- While retaining the list of individuals who are eligible to register as participants in the Unemployment Insurance (*Jaminan Kehilangan Pekerjaan* – “**JKP**”) program, the Amendment no longer asserts that employees/workers who enroll in the social security program solely comprise employees/workers who receive wages from relevant business entities.
- One notable change that features under the Amendment is a decrease in the JKP program premium (“**Premium**”) rate from the previous figure of 0.46% to a rate of 0.36% of the relevant monthly wage. Meanwhile, although the government-borne 0.22% contribution to JKP funding has been retained, the Amendment sets out a re-composition for the Work-Accident Insurance (*Jaminan Kecelakaan Kerja* – “**JKK**”) program under the JKP, which has now been set at 0.14% (a decrease from the previous rate of 0.24%).
- It should also be noted that the above-mentioned Premium rate re-composition now includes the JKK premium rate. In contrast, the re-composition of this rate also previously took into account the applicable life insurance (*Jaminan Kematian* – “**JKM**”) premiums, which no longer feature under the Amendment. As a consequence, any other matters that specifically relate to the above-mentioned Premium re-composition no longer include the JKM as an element and only include JKK (e.g. re-composition periods, Premium calculations, applicable wage thresholds and so forth).

9. Regulation of the Minister of Manpower No. 6 of 2025 on the Organization of Vocational Training

Enforcement Date: 30 June 2025

Summary:

- The Employment Information System and Services Application (*Sistem Informasi dan Aplikasi Pelayanan Ketenagakerjaan* – “**SIAPkerja**”) is Indonesia’s central platform for the implementation of Competency-Based Training (*Pelatihan Berbasis Kompetensi Kerja* – “**PBK**”), and PBK organizers are required to register through the SIAPkerja in order to secure Vocational Identification Numbers. In this regard, the SIAPkerja system will

facilitate a wide array of aspects relating to the implementation of PBK, including: 1) Training information and schedules; 2) Implementation reporting; and 3) Graduate tracker.

- One key update that has now been introduced under the framework of Regulation 6/2025 is the detailed regulation of participant recruitment, which has now been structured around the following three mechanisms: 1) Selection through written testing, interviews and document verifications; 2) Cooperation-based recruitment, which will be jointly conducted in collaboration with businesses, industries or the workforce sector under formal agreements; and 3) Affirmative action, a process that is specifically designed to provide training opportunities in order to serve targeted groups (e.g. persons with disabilities).
- Regulation 6/2025 also introduces the concept of Tailor-Made Training, which is a new, collaborative training format aimed at producing graduates whose skillsets are more in line with market requirements for specific types of workers. This type of training will be delivered through structured cooperation that is initiated between vocational training institutions and external stakeholders (e.g. companies and local governments). Furthermore, this scheme will support flexible arrangements in terms of training content, locations, participant quotas and funding models.

10. Regulation of the Minister of Indonesian Migrant Workers Protection/Head of the National Indonesian Migrant Workers Protection Agency No. 9 of 2025 on Improvement of Financial Literacy Among Indonesian Migrant Workers and Family Members of Indonesian Migrant Workers

Enforcement Date: 15 July 2025

Summary:

- Efforts to improve the financial literacy of Indonesian migrant workers (*Pekerja Migran Indonesia* – “PMI”) should be organized by relevant governmental ministries and agencies, and should be aimed at the following parties: 1) PMI candidates; 2) Existing PMI; 3) Former PMI; and 4) Family members of PMI (e.g. spouses, children and/or parents of PMI).
- Broadly speaking, financial literacy improvement initiatives comprise of two main activities: 1) Financial education (e.g. workshops, counselling or other types of financial education and related activities, as required); and 2) Development of relevant facilities and infrastructure that enables participants in aforementioned financial literacy improvement initiatives to access relevant financial education materials.

11. Regulation of the Minister of Indonesian Migrant Workers Protection/Head of the National Indonesian Migrant Workers Protection Agency No. 14 of 2025 on the Organization of Public

Information Services at the Ministry of Indonesian Migrant Workers Protection/National Indonesian Migrant Workers Protection Agency

Enforcement Date: 15 July 2025

Summary:

- While maintaining the core public information classifications that are available through the Ministry of Indonesian Migrant Workers Protection/National Indonesian Migrant Workers Protection Agency, as originally set out under the now-revoked framework of Regulation of the National Indonesian Migrant Workers Protection Agency No. 8 of 2022 (“**Regulation 8/2022**”), this Regulation has now expanded the scope of public information that is prohibited from being provided to members of the general public based on relevant Laws and Regulations. Said restricted public information encompasses nine criteria that could have serious implications if said information was disclosed to any members of the general public, including: 1) Ability of information to hinder law enforcement processes; 2) Ability of information to impact protections relating to intellectual property rights and unfair business competition; 3) Ability of information to endanger national defense and security; 4) Ability to reveal important information on Indonesia’s natural resources; and/or 5) Ability of information to harm national economic resilience.
- Furthermore, this Regulation has also expanded the list of public information that must be made permanently available from eight types of information under the now-revoked Regulation 8/2022 to 18 types of information. The newly incorporated types of information include: 1) Licensing requirements; licenses that are issued and/or granted along with supporting documents; and reports on licensing arrangements; 2) Numbers, types and general descriptions of violations (whether discovered through processes of internal supervision or reported by members of the public), as well as enforcement action reports; 3) Established legislation along with academic reviews; and 4) Other types of information that has been categorized as accessible to the general public under the objection and/or dispute resolution mechanism.

12. Decree of the Minister of Manpower No. 155 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Category of Professional, Scientific and Technical Activities in the Main Group of Other Professional, Scientific and Technical Activities Within the Refractory Sector

Enforcement Date: 23 June 2022

Summary:

- This Decree stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* – “**SKKNI**”) for the refractory

sector. These SKKNI are comprehensively outlined under the Appendix to this Decree and will now serve as a reference during the drawing up of national qualification levels and the organization of education and training programs, as well as in relation to competence certification. It should be noted that the new SKKNI will be subject to a process of review every five years or whenever such reviews are deemed necessary.

- A total of 31 relevant competence units is outlined under the Appendix to the Decree, including: 1) Analysis of equipment data and operational equipment data; 2) Designation of refractory lining plans; 3) Development of working stages and methods for the refractory installation process; 4) Preparation and implementation of inspection test plans; and 5) Execution of refractory lining installation projects.

13. Decree of the Minister of Manpower No. 165 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Category of Agriculture, Forestry and Fisheries in the Main Group of Crop Agriculture, Animal Husbandry, Hunting and Related Activities (YBDI) Within the Sugarcane Cultivation and White Crystal Sugar Processing Sector

Enforcement Date: 4 July 2025

Summary:

- This Decree stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* – “SKKNI”) for the sugarcane cultivation and white crystal sugar processing sector. These SKKNI are comprehensively outlined under the Appendix to this Decree and will now serve as a reference during the drawing up of national qualification levels and the organization of education and training programs, as well as in relation to competence certification. It should be noted that the new SKKNI will be subject to a process of review every five years or whenever such reviews are deemed necessary.
- A total of 53 relevant competence units is outlined under the Appendix to the Decree, including: 1) Preparation and evaluation of the readiness of planting-ready seedlings; 2) Preparation of land for sugarcane cultivation; 3) Control of plant pests and diseases in sugarcane crops; 4) Loading, transportation and evaluations of transportation of harvested sugarcane; and 5) Preparation and evaluation of sugarcane milling systems and processes.

14. Decree of the Minister of Manpower No. 166 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Category of Processing Industry in the Main Group of Non-Metal Mining Industry Within the Cement-Based Building Materials Industrial Sector

Enforcement Date: 4 July 2025

Summary:

- This Decree stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* – “**SKKNI**”) for the cement-based building materials industrial sector. These SKKNI are comprehensively outlined under the Appendix to this Decree and will now serve as a reference during the drawing up of national qualification levels and the organization of education and training programs, as well as in relation to competence certification. It should be noted that the new SKKNI will be subject to a process of review every five years or whenever such reviews are deemed necessary.
- A total of 28 relevant competence units is outlined under the Appendix to the Decree, including: 1) Development of new fiber cement product innovations; 2) Improvement of the composition of product materials; 3) Operation of relevant machinery and equipment (e.g. destackers/destacking, mixers, sheet formation Hatscheck processing and so forth); 4) Implementation of preventive mechanical maintenance and repairs; and 5) Management of raw materials and spare parts that are stored in warehouses.

Energy

15. Draft Bill on New and Renewable Energy

Enforcement Date: -

Summary:

- Under the July 2025 version of the Draft Bill on New and Renewable Energy (*Energi Baru dan Terbarukan* – “**EBT**”), EBT will ultimately be used to replace non-renewable energy and will be developed through processes of energy transition that will be implemented in line with overall demand for electrical power and fuel, as well as the readiness of the national low-carbon energy system. In this regard, the Draft Bill affirms that the aforementioned energy transition will be completed through the following six processes: 1) Construction of EBT powerplants; 2) Conversion of non-renewable energy power plants to EBT powerplants; 3) Utilization of advanced technologies aimed at reducing the carbon emissions produced by non-renewable energy power plants; 4) Carbon Capture, Utilization and Storage (“**CCUS**”); 5) The accelerated phase-out of coal-fired power plants; and/or 6) Prohibition on the development of new coal-fired power plants in accordance with prevailing Laws and Regulations. However, if EBT is not available in quantities that are sufficient to meet local electrical power grid

needs, then the energy transition may also encompass the utilization of non-renewable forms of energy, as complemented by the use of emissions reduction technologies.

- The Draft Bill classifies EBT businesses into the following sectors: 1) Electrical power supply; 2) Industry; 3) Transportation; 4) Household and commercial; and/or 5) Other activities that are implemented in line with relevant Laws and Regulations. Moreover, the aforementioned EBT businesses should be organized in the following forms: 1) Construction of new energy facilities; 2) Construction of supporting facilities for new energy; 3) Operation and maintenance of new energy facilities; 4) Construction of new energy storage facilities; 5) Construction of new energy distribution facilities; and/or 6) Construction of new energy waste processing facilities.
- In order to support the establishment of a self-reliant and sustainable national energy industry, the government (i.e. central and regional governments operating within their respective jurisdictions) is mandated to facilitate EBT-related research, development, assessments and applications. These efforts should be aimed at the provision of innovative solutions relating to the decarbonization of prioritized energy sectors through the development of several areas, including: 1) Technology and smart grids; 2) Energy storage technologies and smart charging; and 3) Greater efficiency in terms of processes, supply and the utilization of energy. The types of facilities that can be provided for EBT research, development, assessment and application purposes may include funding, procurements, improvements, additional infrastructure and facilities, enhancement of human-resource capabilities, implementation of new technologies and licensing for research, as conducted on either an independent basis or in collaboration with partners across different sectors and countries.
- Under the Draft Bill, the government may provide support in the form of incentives (i.e. fiscal and/or non-fiscal incentives), as well as other types of support relating to EBT business activities and development. Furthermore, the government may also offer support to business entities that are engaged in the development of EBT through the provision of land and infrastructure aimed at accelerating the transition from non-renewable energy power plants to EBT power plants.

16. Draft Bill on the Third Amendment to Law No. 30 of 2009 on Electrical Power

Enforcement Date: -

Summary:

- This new Draft Bill ("**Draft Bill**") is set to become the Third Amendment to Law No. 30 of 2009 on Electrical Power ("**Law 30/2009**") and addresses the various types of primary energy sources that should be optimally utilized through the prioritization of New and Renewable Energy (*Energi Baru dan Terbarukan* – "**EBT**") sources that will be assigned by the central

government to State-Owned Enterprises (*Badan Usaha Milik Negara – “BUMN”*). Moreover, the Draft Bill allows the utilization of EBT sources of primary energy derived from domestic locations. In contrast, the current framework of Law 30/2009 only permits said primary energy to be sourced from overseas.

- Business entities that have been granted areas for the distribution and/or sale of electrical power are required to engage in the electrical power supply sector in line with the National General Electricity Plan (*Rencana Umum Ketenagalistrikan Nasional/RUKN*) and Electrical Power Supply Business Plan (*Rencana Usaha Penyediaan Tenaga Listrik/RUPTL*). Any failure to comply with the aforementioned electrical-power-related plans will result in the imposition of administrative sanctions that may range from written reprimands and administrative sanctions to the revocation of issued business permits.
- While retaining the six core requirements for purchases of electrical power that were originally outlined under Law 30/2009, the Draft Bill now incorporates the utilization of clean energy onto the list of cross-border, electrical power purchasing requirements. Furthermore, cross-border sales of electrical power will also be subject to Non-Tax State Revenue (*Penerimaan Negara Bukan Pajak/PNBP*) for relevant sales, which will be imposed in line with clean energy commodities that possess green attributes and the validity period of the relevant Business Permits for the Provision of Electrical Power for Public Use (*Izin Usaha Penyediaan Tenaga Listrik untuk Kepentingan Umum/IUPTLU*).

17. Regulation of the Downstream Oil and Gas Regulatory Agency No. 2 of 2025 on the Revocation of Regulation of the Downstream Oil and Gas Regulatory Agency No. 1 of 2021 on Tariffs for the Transportation of Natural Gas via Pipeline by PT Pertamina Gas to the Gresik-PKG Gresik Looping Transmission Segment

Enforcement Date: 22 July 2025

Summary:

- This Regulation officially revokes Regulation of the Downstream Oil and Gas Regulatory Agency (*Badan Pengatur Hilir Minyak Dan Gas Bumi – “BPH Migas”*) No. 1 of 2021 on Tariffs for the Transportation of Natural Gas via Pipeline by PT Pertamina Gas to the Gresik-PKG Gresik Looping Transmission Segment.
- This revocation has been initiated due to the fact that provisions on tariffs for the transportation of natural gas through pipelines were comprehensively updated through the issuance of Regulation of the BPH Migas No. 1 of 2023, which is currently serving as the primary reference for the calculation and determination of tariffs.

General Financial Services

18. Regulation of the Financial Services Authority No. 16 of 2025 on Fit-and-Proper Testing and Reassessments of Main Parties Operating Within the Financial Technology Innovation Sector and the Digital Financial and Crypto-Assets Sector

Enforcement Date: 1 October 2025

Summary:

- At its core, this Regulation introduces no significant changes to the fit-and-proper assessment requirements that apply to prospective main parties (e.g. integrity and financial soundness regarding control over key parties) as previously outlined under Regulation of the Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”) No. 4 of 2025 on Financial Services Aggregation Organizers (“**Regulation 4/2025**”) and Regulation of the OJK No. 29 of 2024 on Alternative Credit Scoring Agencies (“**Regulation 29/2024**”). Upon the enforcement of this new framework, the provision of fit-and-proper assessments, as previously addressed under both Regulation 29/2024 and Regulation 4/2025, will be repealed and replaced.
- Prospective main parties were previously required to meet six integrity requirements (e.g. had to have the legal capacity to act and could not be classified as prohibited parties). However, this new Regulation has now removed one of the previously established requirements (i.e. the obligation to maintain the confidentiality and security of all consumer data and information).
- It is important to note that the OJK will issue a decision within 30 working days of a given application document being deemed complete. If a proposed Controlling Shareholder (*Pemegang Saham Pengendali*/PSP) is not ultimately approved, then they must: 1) Transfer their share ownership and refrain from exercising any control; and 2) Comply with all restrictions relating to shareholder rights. (Arts. 23 - 24)

Infrastructure and Construction Services

19. Regulation of the Minister of National Development Planning/Head of the National Development Planning Agency No. 5 of 2025 on the Amendment to Regulation of the Minister of National Development Planning/Head of the National Development Planning Agency No. 1

of 2009 on Procedures for the Planning, Submission and Evaluation of Activities Financed Through Domestic Loans

Enforcement Date: 18 July 2025

Summary:

- Although the drafting of the Domestic Loan Requirement Plan (*Rencana Kebutuhan Pinjaman Dalam Negeri* - “**RKPDN**”) will continue to take the National Medium-Term Development Plan (*Rencana Pembangunan Jangka Menengah Nasional*//RPJMN) into account, the Amendment also affirms that a Special RKPDN may also be drawn up in order to accommodate the needs of strategic national interests operating within the fields of defense, law enforcement, state intelligence and special materials for maintaining public security and order. Moreover, both the Regular and Special RKPDN may be updated as needed and/or in response to national economic developments.
- Newly featured under the Amendment, the Indonesian Public Prosecutor’s Office, the State Intelligence Agency (*Badan Intelijen Negara* – “**BIN**”) and the Indonesian Police Force are mandated to propose activity plans that address activities that said bodies wish to finance through Domestic Loans (*Pinjaman Dalam Negeri* - “**PDN**”) and to submit said plans to the Minister of National Development Planning (“**Minister of Planning**”). Said proposed activity plans may encompass law enforcement equipment (for the Indonesian Public Prosecutor’s Office), intelligence tools (for BIN) and special materials and equipment (for the Indonesian National Police Force). Meanwhile, the Ministry of Defense should also submit proposed activity plans for financing via PDN. Said activity plans should include defense and security equipment required by the Ministry of Defense and the Indonesian National Armed Forces and that these bodies wish to finance through PDN.

20. Decree of the Head of the National Public Procurement Agency No. 93 of 2025 on the Implementation of the E-purchasing Electronic Catalog Through the Mini-Competition Method

Enforcement Date: 8 July 2025

Summary:

- As outlined comprehensively under the Appendices to this Decree, the implementation of the e-purchasing electronic catalog through the mini-competition method is available for the selection working committee upon this feature becoming available within the electronic catalog application. In this regard, the aforementioned electronic catalog can be accessed through the following link: <https://katalog.inaproc.id/>.
- The above-mentioned mini-competition method comprises three types of mini-competitions that broadly break down as follows: 1) For other

- goods/services (i.e. itemized and non-itemized); 2) For construction works; and 3) For consultation services.
- It should be noted that the services that facilitate the selection of goods/service providers through the electronic catalog will be subject to a Non-Tax State Revenue (*Penerimaan Negara Bukan Pajak/PNBP*) fee that is required to be settled by the relevant providers.

Land & Property

21. Regulation of the Minister of Housing and Settlement Areas No. 11 of 2025 on the Amendment to Regulation of the Minister of Housing and Settlement Areas No. 5 of 2025 on Income Levels and Criteria for Low-Income Communities, as Well as Requirements for the Facilitation of Housing Development and Ownership

Enforcement Date: 21 July 2025

Summary:

- Although the income levels of low-income citizens (*Masyarakat Berpenghasilan Rendah* – “**MBR**”) will be set based on zoning demarcations, this Amendment newly clarifies that said incomes may be earned by individuals outside the territory of Indonesia. As such, the overseas income level will follow the designated individual income level for Zone 4, while income levels will be calculated by taking the following areas into account: 1) Consistency of income data of Indonesian Migrant Workers (*Pekerja Migran Indonesia* – “**PMI**”) with national unified socio-economic data; 2) Minimum income data of PMI in relevant placement countries; and 3) Conversion value based on purchasing power parity.
- The abovementioned conversion value, as outlined in point (3) above, should be calculated through a comparison between the value of one United States Dollar in accordance with bilateral purchasing power parity with the currency of Indonesia and the currency of the country in which an MBR is employed as an Indonesian migrant worker.

22. Technical Guidelines of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 3/JUKNIS-HK.02.02/VII/2025 on the Administration of Regional Spatial Planning Forums for the Issuance of Conformity of Space Utilization Activity Approvals

Enforcement Date: 2 July 2025

Summary:

- Broadly speaking, this new set of technical guidelines will now serve as a reference for use by regional governments, regional Spatial Planning Forums (*Forum Penataan Ruang* – “**FPR**”), as well as regional and local land offices during the processing and issuance of Conformity of Space Utilization Activity (*Kesesuaian Kegiatan Pemanfaatan Ruang* – “**KKPR**”) approvals (*Persetujuan KKPR* – “**PKKPR**”). Overall, the new technical guidelines cover various aspects that relate to the following areas: 1) FPR membership mechanism; 2) FPR duties and functions; 3) FPR reporting mechanism; and 4) Mechanism for the study of commercial and non-commercial PKKPR by regional FPR.
- In terms of the issuance of commercial PKKPR, the technical guidelines affirm that commercial KKPR will be processed via the Online Single Submission (“**OSS**”) system. Upon securing KKPR, relevant businesses may submit their applications for relevant business permits and will subsequently be permitted to utilize relevant spaces upon securing said permits. Nevertheless, a PKKPR for commercial activities will be issued in the event that a planned location meets the following criteria: 1) No Detailed Spatial Plans (*Rencana Detail Tata Ruang* – “**RDTR**”) are available; and 2) RDTR are available but have yet to be integrated into the OSS system.
- In terms of PKKPR assessments for commercial activities, the technical guidelines outline the following two major phases for the issuance of said approvals: 1) Assessment of the relevant spatial plans; and 2) Assessment of land and sectoral aspects (e.g. forestry, mining and others).

Monetary & Payment System

23. Regulation of the Bank Indonesia Board of Governors No. 14 of 2025 on the Second Amendment to Regulation of the Bank Indonesia Board of Governors No. 17 of 2023 on the Organization of the Bank Indonesia-Fast Payment System

Enforcement Date: 30 June 2025

Summary:

- In addition to clarifying several of the core 15 obligations that apply to participants in the Bank Indonesia-Fast Payment (“**BI-FAST**”) services system (“**Participants**”), this Second Amendment now includes four additional obligations aimed at ensuring the overall organization and safety of the BI-FAST system, specifically: 1) Must establish dedicated teams capable of initiating incident response and recovery measures; 2) Must provide regular training on BI-FAST operations, Information Technology (“**IT**”) and security for all human resources that are responsible for

operational BI-FAST activities; 3) Must conduct regular reconciliation of BI-FAST transactions; and 4) Must ensure that BI-FAST information system safeguards are put in place.

- Bank Indonesia (“**BI**”), as the organizer of the BI-FAST system, is authorized to inspect all third parties that are hired to manage BI-FAST infrastructure. In this regard, the Second Amendment mandates that said providers of third-party infrastructure must ensure that they fulfil at least five types of safeguard measures, including: 1) Must meet minimum technical requirements relating to BI-FAST IT infrastructure protection; 2) Must clearly distinguish between the responsibilities of Participants and any third parties that manage Participants’ BI-FAST infrastructure in terms of IT infrastructure protection; and 3) Must conduct periodic information system audits and security testing.
- The proactive risk management feature that was originally mandated for inclusion as part of the BI-FAST infrastructure has now been redefined as the Fraud Detection System (FDS). While the new FDS retains the majority of the previously available features and applications, the Second Amendment also sets out several additional aspects and requirements to this mandatory feature that should now be taken into account, including: 1) Submission of initial information and transaction reports; 2) Indications of mule accounts; and 3) Fraud management system.

24. Regulation of the Bank Indonesia Board of Governors No. 15 of 2025 on the Implementation of Anti-Money Laundering, Prevention of Terrorism Financing and Prevention of Financing of the Proliferation of Weapons of Mass Destruction by Parties Regulated and Supervised by Bank Indonesia

Enforcement Date: 30 June 2025

Summary:

- This Regulation stipulates that the implementation of risk management processes by operators must be guided by risk-based guidelines on Anti-Money Laundering (*Anti Pencucian Uang* – “**APU**”), Prevention of Terrorism Financing (*Pencegahan Pendanaan Terorisme* – “**PPT**”) and Prevention of Financing of the Proliferation of Weapons of Mass Destruction (*Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal* – “**PPPSPM**”), as well as by National Risk Assessments and Sectoral Risk Assessments.
- This new framework also requires business actors operating within the financial sector to submit reports to Bank Indonesia that specifically address the implementation of APU, PPT and PPPSPM. Said reports encompass: 1) Periodic reports (e.g. reports on the results of risk identification and assessments); 2) Incidental reports (e.g. reports on third-party cooperation regarding the conducting of customer due diligence); and 3) Other reports, as requested by Bank Indonesia.

Natural Resources

25. Regulation of the Minister of Agriculture No. 17 of 2025 on the Amendment to Regulation of the Minister of Agriculture No. 29 of 2021 on the Naming and Registration of Plant Varieties

Enforcement Date: 3 July 2025

Summary:

- While maintaining the seven previously applicable requirements for the naming of plant varieties ("**Varieties**"), the Amendment now outlines eight additional naming requirements, including: 1) A name must comprise no more than 30 characters; 2) A name must not be interpreted as exaggerating the actual value of the relevant variety; 3) A name must not feature the words, "crossbreed", "hybrid", "group", "form", "mutant", "seedling", "strain" or "variety" or the plural forms of these words; 4) A name must not use any punctuation marks; and 5) A name must not use the name of any type or species or any botanical name when a single word is used.
- In terms of local Varieties, the Amendment now requires any such Variety upon its registration to also be accompanied by a declaration affirming that said local Variety is the result of a process of natural adaptation that has lasted a minimum of five years within its geographical distribution area. In terms of descriptions, the Amendment also requires a description to be drafted by the party who has direct involvement in the process of describing the local Variety in accordance with their area of expertise.
- Previously, the timeframe that the Head of the Center for Plant Variety Protection and Agricultural Licensing (*Pusat Perlindungan Varietas Tanaman dan Perizinan Pertanian* – "**PVTPP**") was granted in order to respond, either accepting or suggesting improvements regarding local Variety registration applications, was set at 30 business days from the date upon which a local Variety registration application was received. However, the Amendment has now revised this timeframe to no more than 17 business days.
- If any doubts emerge and/or there is a lack of clarity regarding Variety descriptions and other information, as set out in a local Variety registration application, then a field verification will be conducted by the PVTPP. If the results of this field verification do not resolve the prevailing doubts and/or lack of clarity regarding a Variety description and other information, then a DNA (Deoxyribonucleic Acid) test should be conducted by the applicant with the approval of the PVTPP.
- Newly outlined under the Amendment, applicants (or their representatives) may submit applications to correct Variety registration certificates ("**Certificates**") if errors have not been caused by them. Send applications will subsequently be processed by the PVTPP free of charge, while related

reviews and processes will be completed within specific timeframes. In this regard, any incomplete applications may be withdrawn. Moreover, certificates can be canceled or revoked by the PVTTP if they are found to contain false information, result in ownership disputes or if the registered variety is unavailable, with official records being amended and announcements being made accordingly.

26. Regulation of the Minister of Agriculture No. 19 of 2025 on Requirements for the Importation of Animal Products Originating from Countries or Zones in Countries of Origin in Certain Cases

Enforcement Date: 9 July 2025

Summary:

- Under certain conditions (e.g. natural disasters, lack of available animal products and/or highly priced animal products that cause inflation and affect overall national economic stability), animal products (i.e. boneless meat, bone-in meat and offal) are permitted to be imported into Indonesian territory from the following countries: 1) Foot-and-mouth disease-free zones; or 2) Countries that are not yet free from foot-and-mouth disease but that have initiated official control programs that have been recognized by the World Organization for Animal Health (WOAH). By way of comparison, under the now-revoked framework of Regulation of the Minister of Agriculture (“**Minister**”) No. 17 of 2022 (“**Regulation 17/2022**”), bone-in meat and offal were not previously included on the list of animal products that were permitted to be imported under the above-outlined certain conditions.
- In order to be imported into Indonesian territory, the above-listed animal products must fulfill relevant technical requirements, specifically animal health and veterinary requirements. These technical requirements broadly break down as follows: 1) Must originate from areas that are free from foot-and-mouth diseases, including areas not yet designated by the Minister based on the results of risk analyses; 2) Handling of animal products; and 3) Packaging, labeling and transportation.
- Business units that engage in any of the above-mentioned activities must meet the following requirements: 1) Must have registered as export business units; 2) Must be under the supervision of veterinary authorities in their relevant countries of origin; 3) Must take delivery of cattle and/or buffalo from disease-free areas; 4) Must implement food safety assurance systems, as evidenced through the securing of internationally recognized certification; 5) Must implement halal assurance systems; and 6) Must take delivery of raw materials or carcasses from business units that have been approved by the Minister.

27. Regulation of the Minister of Marine Affairs and Fisheries No. 12 of 2025 on the Handling of Indonesian Fishermen Apprehended in Foreign Waters for Unauthorized Fishing

Enforcement Date: 17 July 2025

Summary:

- This Regulation outlines detailed procedures for the handling of fishermen who are arrested in the waters of other countries for illegal fishing. The process of repatriation to Indonesia comprises four key stages: 1) Receipt of information on any detained fishermen; 2) Collection and documentation of relevant data; 3) Monitoring of the condition and legal statuses of detained fishermen while they are in detention; and 4) Facilitation of their return to Indonesia through coordinated efforts with relevant authorities.
- The Regulation also expands the responsibility for initial funding to include fishermen, vessel owners/operators, financiers, beneficial owners and/or their families. However, the Ministry of Marine Affairs and Fisheries (*Kementerian Kelautan dan Perikanan/KKP*) may cover costs directly if: 1) A violation results from a force-majeure event; or 2) A fisherman falls ill or passes away during legal proceedings in a foreign country.
- Upon the enforcement of this new Regulation, the previous framework of Regulation of the Minister of Marine Affairs and Fisheries No. 39/PERMEN-KP/2016 ("**Regulation 39/2016**") was officially repealed and replaced. However, it should also be noted that any fishermen who were in the process of being repatriated prior to the enforcement of this Regulation will continue to be processed in accordance with Regulation 39/2016.

Non-Banking Financial Services

28. Circular of the Financial Services Authority No. 12/SEOJK.05/2025 on Work Competence Certification for Insurance Companies, Guarantee Institutions, Pension Funds and Special Institutions Within the Insurance, Guarantee and Pension Fund Sector

Enforcement Date: 23 June 2025

Summary:

- At its core, this Circular mandates the development and improvement of the overall quality of the human resources of insurance companies, guarantee institutions, pension funds and special institutions operating within the insurance, guarantee and pension fund sector (collectively referred to as "**Companies**"). Said development and improvement should be realized through the following activities: 1) Certification of work competence within

the insurance, guarantee and pension fund sector; 2) Types of competency certification other than those outlined in point (1) above; and 3) Other competency improvements. In terms of the other competency improvements outlined in point (3) above, this Circular addresses various specific competencies, including: 1) Writing skills; 2) Critical thinking; 3) Problem solving; 4) Leadership; and 5) Digital literacy.

- In terms of work competence certification that is applicable within the insurance, guarantee and pension fund sector, this Circular affirms that said certification encompasses following fields: 1) Risk management; 2) Insurance; 3) Guarantees; 4) Pension funds; 5) Investment; and/or 6) Other relevant fields. Meanwhile, in terms of other types of competency certification, this Circular addresses certification within the following fields: 1) Capital market; 2) Management; and 3) Finance.
- Upon entering into force, this new framework officially repealed and replaced Circular of the OJK No. 17/SEOJK.05/2019, which previously outlined a certification mechanism for guarantee institutions that encompassed risk management and other types of expertise. However, it should be noted that any valid certification relating to the areas of insurance, guarantee and pension funds that was not specifically revoked by Regulation of the OJK No. 34 of 2024 will remain valid.

29. Circular of the Financial Services Authority No. 13/SEOJK.05/2025 on the Forms and Structures of the Periodic Reports of Insurance Brokerage Companies, Reinsurance Brokerage Companies and Insurance Loss Assessment Companies

Enforcement Date: 23 June 2025

Summary:

- In comparison with Circular of the Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”) No. 25/SEOJK.05/2020, as amended by Circular of the OJK No. 21/SEOJK.05/2023 (collectively referred to as “**Circular 25/2020**”), this new framework has now revised the list of periodic reports that must be submitted by insurance brokerage companies, reinsurance brokerage companies and insurance loss assessment companies (collectively referred to as “**Companies**”) as follows: 1) Quarterly reports (not applicable to insurance loss assessment companies); 2) Annual reports; and 3) Other types of reports. In terms of the other types of reports outlined in point (3) above, this new framework has now expanded this mandatory report classification to include: 1) Anti-fraud strategy implementation reports; 2) Risk assessments relating to anti-money-laundering, prevention of terrorism financing and proliferation of weapons of mass destruction initiatives; and 3) Data update reports.
- The above-outlined mandatory periodic reports should be submitted via the official reporting system of the OJK, while any Companies that have successfully submitted said reports will be issued official receipts through this system.

- Upon entering into force, this new framework officially repealed and replaced Circular 25/2020.

30. Circular of the Financial Services Authority No. 16/SEOJK.07/2025 on the Application of Anti-Money Laundering, Prevention of Terrorism Financing and Prevention of the Funding of the Proliferation of Weapons of Mass Destruction Programs by Digital Financial Asset Traders

Enforcement Date: 3 July 2025

Summary:

- Traders in digital financial assets, including crypto-assets (“**Traders**”), are now mandated to implement Anti-Money-Laundering and Prevention of Terrorism Financing and the Proliferation of Weapons of Mass Destruction Funding (*Anti Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massa*) (collectively referred to as “**APU-PPT-PPSPM**”) programs by taking into account various risks associated with money laundering, terrorism funding and the proliferation of weapons of mass destruction, as well as the scale, complexity and characteristics of the relevant Trader’s business. In essence, the APU-PPT-PPSPM programs encompass the following aspects: 1) Active supervision by the board of directors and board of commissioners; 2) Policies and procedures; 3) Internal controls; 4) Management information systems; and 5) Human resources and training.
- All Traders are required to establish dedicated procedures and policies that specifically address the implementation of their APU-PPT-PPSPM programs. These procedures and policies must be established through a risk-based approach and should at the very least address the following areas: 1) Identification of customers based on their risk levels; 2) Detection of suspicious transactions; 3) Determination of monitoring intensity, as tailored to customer risk levels; 4) Risk assessments; 5) Special measures for high-risk areas; 6) Administration; 7) Planning and implementation of customer data and information updates; and 8) Reporting.
- The indicators that determine a country/geographical area/jurisdiction as high risk include: 1) Inadequate implementation of Financial Action Task Force (FATF) recommendations; 2) Identification as uncooperative or a tax haven by the Organization for Economic Cooperation and Development (OECD); 3) Low level of governance; 4) High level of corruption risk, as identified by the Transparency International Corruption Perceptions Index; 5) Status as a drug production and distribution hub; 6) Subject to sanctions, embargoes or similar measures by the United Nations (UN); and 7) Provision of funding or support for terrorist activities.

31. Draft Regulation of the Financial Services Authority on the Integrity of Financial Reporting by Financing Institutions, Venture-Capital Companies, Microfinance Institutions and Other Financial Services Institutions

Enforcement Date: -

Summary:

- If it is ultimately enforced, then this Draft Regulation will require all Financing Institutions, Venture-Capital Companies, Microfinance Institutions and Other Financial Services Institutions (*Lembaga Pembiayaan, Perusahaan Modal Ventura, Lembaga Keuangan Mikro, dan Lembaga Jasa Keuangan Lainnya* - “PVML”) to establish integrity-based financial reporting processes in order to ensure the truthfulness, accuracy and transparency of all information that is incorporated into their financial statements.
- To reflect this new mandate, the Draft Regulation is set to require all PVML to establish internal control procedures for their financial reporting in order to ensure that the above-outlined integrity-based financial reporting mandates are fulfilled. These procedures must cover at least five specific elements (e.g. transaction recording procedures and controls in order to prevent unauthorized transaction timing).
- The Draft Regulation also requires PVML to establish a dedicated working unit or to assign one executive official to assume responsibility for the prevention of any fraud or manipulation during the recording of financial information. The establishment of these human resources should reflect the overall complexity of the relevant PVML business.
- Any PVML that are already required to submit audited annual financial statements will also now be required to submit internal control reports along with said statements. Meanwhile, any PVML not yet subject to this requirement must submit internal control reports to their respective supervisory units by April 30 of the following year.

32. Draft Circular of the Financial Services Authority on the Amendment to Circular of the Financial Services Authority No. 25/SEOJK.05/2019 on Monthly Reporting by Venture Capital Companies and Sharia Venture Capital Companies

Enforcement Date: -

Summary:

- If ultimately enforced, this Draft Circular will revise the applicable mechanism for the submission of mandatory monthly reports by conventional and sharia venture capital companies (collectively referred to as “**Companies**”).
- Currently, if Companies face any technical difficulties that result in their inability to submit online monthly reports to the Financial Services Authority

(*Otoritas Jasa Keuangan* – “**OJK**”), then said Companies will be required to submit reports in the form of electronic copies (soft file) accompanied by proofs of validation by no later than the following day to the Director of Non-Banking Financial Industry Information and Statistics at the OJK. However, under the Draft Circular, these soft copy reports will have to be submitted via the Head of the Data and Statistics Management Department at the OJK.

- Consequently, any inquiries related to the submission of the above-mentioned monthly reports by Companies may be submitted to the Head of the Data and Statistics Management Department at the OJK. In contrast, said inquiries are currently processed in a general fashion through the official OJK helpdesk.

33. Draft Circular of the Financial Services Authority on the Organization of the Micro Waqf Bank Program by Islamic Microfinance Institutions

Enforcement Date: -

Summary:

- If it is ultimately enforced, then this Draft Circular will set out applicable prerequisites for Sharia Microfinance Institutions (*Lembaga Keuangan Mikro Syariah* – “**LKMS**”) that organize Micro Waqf Bank (*Bank Wakaf Mikro* – “**BWM**”) programs. In this regard, any LKMS eligible to organize BWM programs should take the form of cooperatives.
- This Draft Circular outlines three specific LKMS business activities that relate to BWM programs. These activities break down as follows: 1) Provision of micro-scale financing to the community; 2) Management of deposits in accordance with criteria set by the Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”); and 3) Provision of business development consulting services.
- In terms of capital requirements, the Draft Circular mandates that sources of capital for BWM programs that are organized by LKMS comprise principal savings, mandatory savings and grants, which may include donations such as *infaq* and *sadaqah*. Moreover, the Draft Circular requires LKMS to possess a minimum level of capital amounting to Rp. 4 billion in accordance with policies set by the relevant BWM program owner. This Draft Circular also affirms that LKMS may deposit up to Rp. 2 billion of their funds in time deposits and/or deposit certificates with Islamic commercial banks, Islamic business units of commercial banks and/or rural banks.

34. Draft Circular of the Financial Services Authority on Electronic Licensing, Approvals and Reporting for Pawnshop Companies

Enforcement Date: -

Summary:

- The Draft Circular addresses three types of submissions that are required to be made by pawnshop companies (“**Companies**”). The first of these is licensing applications, which include business licenses, conversions to sharia-compliant entities and the establishment of sharia business units (*Unit Usaha Syariah* – “**UUS**”). The second type of submission is approval applications, which cover matters such as voluntary UUS spin-offs, UUS closures and the employment of foreign workers. The third type of submission relates to reporting obligations, which encompass the implementation of business activities, resolutions from general meetings of shareholders that approve conversions to sharia-compliant entities and the implementation of said conversions.
- Companies are required to submit applications to the Financial Services Authority (*Otoritas Jasa Keuangan* – “**OJK**”) along with the necessary supporting documents and self-assessment forms, as signed by their boards of directors. Submissions must take the form of color scans of original documents and must be submitted online via the data communications system. In this regard, it should be noted that printed submissions are no longer required. In cases where the system is unavailable or is experiencing technical problems or force-majeure conditions, then electronic submissions via designated email addresses are permitted. Submissions may also be completed offline through the storage of written notifications and supporting documents on compact disks or other electronic media, which should then be delivered by mail or in person if technical issues are preventing online submissions. A submission will be considered completed upon receipt of a confirmation through the system, proof of email or a physical OJK receipt, depending on the method of submission used.
- Companies are required to retain hard copies of all submitted applications for as long as their corresponding licenses and approvals remain valid. In terms of reporting obligations, hard copies must be retained for a minimum of five years from the relevant reporting dates. The OJK may verify and/or validate the accuracy and reasonableness of all hard copies against originals that are submitted through the system or via email. Accordingly, companies are also required to provide hard copies of submitted documents during OJK verification and validation processes.

Pharmacies, Health Industry, and Foods & Drugs Standards

35. Regulation of the Minister of Health No. 6 of 2025 on the Stipulation of and Changes to Psychotropic Classifications

Enforcement Date: 30 June 2025

Summary:

- While retaining the official list of Class II - Class IV psychotropics that originally featured under the framework of Regulation of the Minister of Health No. 31 of 2023 ("**Regulation 31/2023**"), this Regulation has now expanded the list of psychotropics that are classified as Class I from 6 to 11 psychotropic products. The newly featured psychotropic products break down as follows: 1) Bromazolam; 2) Flubromazepam; 3) Deschloroetizolam; 4) Flunitrazolam; and 5) Deschloro-N-ethyl-Ketamine.
- Upon entering into force, this Regulation officially repealed and replaced Regulation 31/2023.

36.Regulation of the Minister of Health No. 7 of 2025 on Narcotics Classification Changes

Enforcement Date: 30 June 2025

Summary:

- While retaining the official list of 90 Class II and 15 Class III narcotics that originally featured under the framework of Regulation of the Minister of Health No. 30 of 2023 ("**Regulation 30/2023**"), this Regulation has now expanded the list of narcotics that are classified as Class I from 217 to 219 narcotics products. The newly featured narcotics products are Alpha-Propylaminopentiophenone and 3,4-Methylenedioxy PV8.
- Upon entering into force, this Regulation officially repealed and replaced Regulation 30/2023.

37.Decree of the Minister of Health No. HK.01.07/MENKES/730/2025 on the Claims Values of Medicines under the Referral Back Program, Chronic Disease Medicines at Advanced Healthcare Facilities, Chemotherapy Medicines and Alteplase Medicines

Enforcement Date: 14 July 2025

Summary:

- In comparison with the now-revoked framework of Decree of the Minister of Health ("**Minister**") No. HK.01.07/MENKES/1665/2024 ("**Decree 1665/2024**"), this Decree has now expanded the list of claims values of medicines under the referral back program, chronic disease medicines at advanced healthcare facilities, chemotherapy medicines and alteplase medicines from 179 drug products under Decree 1665/2024 to 505 drug products under this new Decree. The complete list of the above-outlined

drug products is comprehensively set out under the Appendix to this Decree.

- It should also be noted that if a given healthcare facility offers services that encompass the prescription of 150 mcg Levothyroxine tablets, 300 mg Oxcarbazepine tablets and 600 mg Oxcarbazepine tablets based on Decree of the Minister No. HK.01.07/MENKES/2197/2023 on National Formulary, as amended by Decree of the Minister No. HK.01.07/MENKES/1818/2024, and for which relevant services have not yet been reimbursed due to the absence of a determined claim value, then the Social Security Agency for Health (*Badan Penyelenggara Jaminan Sosial Kesehatan*/BPJS Kesehatan) will process such payments based on the claims values that are stipulated for medicines under this Decree.

38. Regulation of the National Agency of Drug and Food Control No. 17 of 2025 on Guidelines for the Assessment of Health Supplement Products Containing Probiotics

Enforcement Date: 18 July 2025

Summary:

- This new framework requires relevant business actors to complete self-assessments in order to determine whether their products should be categorized as medicines, health supplements or processed foods. This is particularly important in terms of efforts to distinguish products that contain registered probiotic strains, new probiotic strains or combinations of new probiotic strains.
- Health supplement products containing probiotics must be accompanied by supporting documents whenever they are submitted for registration (e.g. strain identification and functional characterization). At a minimum, these documents must detail the various methods that are used in order to identify microorganisms, as well as procedures for the storage of said strains and the results of both in-vitro and in-vivo testing.

39. Regulation of the National Agency of Drug and Food Control No. 18 of 2025 on the Supervision of Tobacco Products and Electronic Cigarettes

Enforcement Date: 3 July 2025

Summary:

- Regulation 18/2025 has now broadened the scope of product supervision beyond the previous framework of Regulation 41/2013 by including electronic cigarettes and introducing a number of new obligations that business actors are required to comply with. Producers, importers and

distributors are now required to disclose all product ingredients and additives, and are also prohibited from utilizing any harmful substances unless said substances have been scientifically proven to be safe. In order to ensure compliance with the new framework, testing must be conducted at two separate accredited laboratories, with the results being submitted to the Head of the National Agency of Drug and Food Control (*Badan Pengawas Obat Dan Makanan*/BPOM) for review.

- This Regulation has also tightened requirements for health warnings on product packaging, mandating the use of five rotating warnings per variant. These warnings must comprise text and images, occupy 50% of the front and rear wide sides of packaging and comply with a detailed set of design standards (e.g. font, color, visibility). Labels must also clearly state that products must not be sold or given to individuals under 21 or pregnant women.
- Electronic cigarette businesses are also required to display clear and legible information on all of their packaging, including a nicotine content warning, production details and applicable health warnings, while also avoiding any misleading or promotional language.

40. Regulation of the National Agency of Drug and Food Control No. 19 of 2025 on the Amendment to Regulation of the National Agency of Drug and Food Control No. 9 of 2024 on Guidelines for Follow-up Actions to Supervision Results for Drugs, Drug Substances, Narcotics, Psychotropics, Precursors and Addictive Substances

Enforcement Date: 3 July 2025

Summary:

- The Amendment has now broadened the overall definition and scope of addictive substances that were originally outlined under Regulation of the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan* – “**BPOM**”) No. 9 of 2024 (“**Regulation 9/2024**”) to include not only tobacco products but also electronic cigarettes. Under this new Amendment, addictive substances are defined as solid, liquid or gas products (whether they contain any tobacco or not) that may pose harm to individuals and/or the general public.
- The authority of the Head of BPOM to issue recommendations has also now been expanded. Previously, recommendations were directed to ministries, government agencies or local governments responsible for the issuance of business licenses. Now, BPOM may also submit recommendations directly to institutions that have relevant authority in accordance with their various duties and functions. Additionally, the nature of these recommendations has shifted (i.e. recommendations for temporary suspensions of activities have been replaced with recommendations for product recalls).

41. Regulation of the National Agency of Drug and Food Control No. 20 of 2025 on Good Drug Distribution Practice Standards

Enforcement Date: 3 July 2025

Summary:

- This Regulation introduces a new provision that allows pharmaceutical wholesalers (*Pedagang Besar Farmasi* – “**PBF**”), PBF branch offices and pharmaceutical management facilities to implement Good Drug Distribution Practice (*Cara Distribusi Obat yang Baik* – “**CDOB**”) standards through electronic systems. Said electronic systems may be developed, managed and operated independently or in collaboration with Electronic System Providers (*Penyelenggara Sistem Elektronik* – “**PSE**”) or Electronic Trading Platform Providers (*Penyelenggara Perdagangan Melalui Sistem Elektronik* – “**PPMSE**”).
- The principles of CDOB also apply to comparator drugs, medicines used in clinical trials or research, donated drugs and drugs that are imported under the Special Access Scheme (SAS). All parties involved in the distribution process are required to apply due diligence by adhering to CDOB guidelines (e.g. ensuring proper traceability and identifying potential risks throughout the distribution chain in order to maintain overall drug safety and quality).
- Upon the enforcement of this new framework, Regulation of the National Agency of Drug and Food Control (*Badan Pengawas Obat Dan Makanan* – “**BPOM**”) No. 9 of 2019, as amended by Regulation of the BPOM No. 6 of 2020, was officially repealed and replaced.

42. Draft Regulation of the National Agency of Drug and Food Control on Criteria and Procedures for the Registration of Natural Medicines

Enforcement Date: -

Summary:

- If ultimately enforced, then this new Draft Regulation will ultimately repeal and replace the existing framework on criteria and procedures for the registration of natural medicines, i.e. Regulation of the National Agency of Drug and Food Control (*Badan Pengawas Obat Dan Makanan* – “**BPOM**”) No. 25 of 2023 (“**Regulation 25/2023**”).
- Fundamentally, the Draft Regulation introduces a new requirement, specifically, when Natural Herbal Medicines are manufactured through the use of advanced technologies (e.g. nanomaterials, irradiation or genetic engineering), then the relevant business actors must submit toxicity and/or pharmacodynamic data in order to ensure compliance with applicable safety and/or efficacy standards.
- The Draft Regulation also features a number of provisions that address the registration of imported products. These provisions state that import registration applications must be submitted by all relevant business entities.

In this context, business entities should be defined as importers operating as Pharmaceutical Wholesalers (*Pedagang Besar Farmasi/PBF*), Natural Herbal Medicine Wholesalers (*Pedagang Besar Obat Bahan Alam/PBOBA*) or manufacturer-importers.

Tax & Non-Tax Charges

43.Regulation of the President No. 68 of 2025 on the Tax Collection System for Overseas Digital Transactions

Enforcement Date: 5 June 2025

Summary:

- The Indonesian Government has introduced a regulatory framework on the organization of a new Tax Collection System for Overseas Digital Transactions (*Sistem Pemungutan Pajak atas Transaksi Digital Luar Negeri – “SPP-TDLN”*). The framework mandates that SPP-TDLN will be organized by PT Jalin Pembayaran Nusantara, which has been appointed based on several considerations, including the company’s technical and financial capabilities, as well as its data security standards.
- In order to implement SPP-TDLN, PT Jalin Pembayaran Nusantara must directly appoint a partner, which must be an Indonesian and/or foreign legal entity and which must possess adequate infrastructure and supporting systems that are capable of handling relevant data and information, as well as technology that will be used for international outreach purposes. Moreover, PT Jalin Pembayaran Nusantara must also complete a sandboxing process in order to assess the qualifications of prospective partners. This process will include administrative assessments, as well as technical testing.
- In terms of the mandated administrative assessment, a prospective partner should at least demonstrate that they possess a certain level of professional experience and financial capability, and must also have a proven record that shows it has no conflict of interest and no history of imposed sanctions. Meanwhile, technical testing will assess the prospective partner’s functions, cybersecurity, performance, governance, risk compliance and personal data protection.

44.Regulation of the Minister of Finance No. 37 of 2025 on the Appointment of Other Parties as Collectors of Income Taxes and Procedures for the Collection, Deposit and Reporting of Income Taxes Collected by Other Parties on Income Received or Earned by

Domestic Merchants via the Mechanism of Electronic System-Based Trading Activities

Enforcement Date: 14 July 2025

Summary:

- This framework now places responsibility for the collection, deposit and reporting of Article-22 Income Tax (*Pajak Penghasilan* – “**PPh**”) on income received by domestic merchants via Electronic System-Based Trading Activities (*Perdagangan Melalui Sistem Elektronik* – “**PMSE**”) with the relevant Organizers of PMSE (*Penyelenggara PMSE* - “**PPMSE**”). In this regard, PPMSE must comply with this new tax collection mandate if they meet the following criteria: 1) Generate transaction values within Indonesia through the use of electronic facilities that exceed a specified threshold within a 12-month period; and/or 2) Have a total number of users or traffic amount that exceeds a specified threshold within a 12-month period.
- Meanwhile, domestic merchants will be subject to the above-outlined PPh collection by PPMSE upon meeting the following thresholds: 1) Receive income through a bank account or similar financial account; and 2) Engage in transactions through the use of an Internet Protocol (IP) address located within Indonesia or through a telephone number that features the Indonesian country code. Consequently, all such merchants must provide several types of information (i.e. taxpayer identification numbers or citizenship identification numbers, as well as correspondence addresses) and statement letters to the relevant PPMSE for PPh collection purposes.
- Pursuant to Regulation 37/2025, the amount of Article-22 PPh that should be collected by PPMSE has been set at 0.5% of a domestic merchant’s gross turnover, as outlined in relevant billing documents (excluding value-added tax and luxury-goods sales tax). However, six types of domestic merchant incomes that derive from certain transactions are exempted from the collection of Article-22 PPh, as undertaken by PPMSE (e.g. sale of mobile phone credits, sale of gold jewelry and/or transfers of rights over land and/or buildings).

45. Regulation of the Director-General of Taxes No. PER-13/PJ/2025 on the Taxpayers’ Charter

Enforcement Date: 14 July 2025

Summary:

- This new framework sets out a new Taxpayers’ Charter (“**Charter**”), which is primarily intended to reinforce the commitment of the Directorate-General of Taxes (*Direktorat Jenderal Pajak* – “**DJP**”) to the principles of transparency, accountability and fairness. The goal of the Charter is to strengthen the relationship of mutual trust between taxpayers and the DJP

during the exercise of taxpayer rights and fulfilment of their tax obligations in accordance with applicable Laws and Regulations.

- In essence, the new Charter sets out a number of key rights for taxpayers (e.g. the right to access taxation-related information and education and the right to receive tax services free of charge). Notably, the Charter also guarantees taxpayers the right to enjoy confidentiality and security in terms of all taxpayer data, as well as the right to appoint proxies to act on their behalf, provided that said proxies comply with prevailing Regulations.
- In addition to these rights, the Charter also outlines a number of core taxpayer obligations (e.g. the requirement to submit accurate Annual Tax Returns [*Surat Pemberitahuan/SPT*]). Taxpayers are also expected to be cooperative whenever providing data, information and other materials that support tax services, oversight, audits and law enforcement.

Technology, Media, and Telecommunication

46. Draft Decree of the Minister of Communication and Digital Affairs on the List of Telecommunications Equipment and/or Telecommunications Devices Subject to the Mandatory Fulfillment of Technical Standards

Enforcement Date: -

Summary:

- Various types of telecommunications equipment and telecommunications devices (collectively referred to as “**Telecommunications Devices**”) will now be subject to the mandatory fulfillment of the applicable technical standards, as proven through issued certification for Telecommunications Devices (“**Certification**”). The various devices that feature on this new list of Telecommunications Devices subject to the technical standards (“**Device List**”) are listed based on their relevant Harmonized System (“**HS**”) codes. Nevertheless, any devices with telecommunications features that are not yet listed on the Device List will still be obliged to comply with various technical standards for Telecommunications Devices in accordance with relevant Laws and Regulations.
- A total of 93 types of Telecommunications Devices (e.g. computers, smartphones, radio transceivers and so forth) are outlined comprehensively under the Appendix to the Draft Decree and now fall into the category of Telecommunications Devices that are required to meet relevant technical standards, which must be proven through certification on conformity with technical standards for Telecommunications Devices (“**Certification**”).

- In addition to the abovementioned Telecommunications Devices, this Draft Decree also outlines a total of 61 other types of devices with telecommunications features (e.g. air conditioners, electronic data capture [EDC] machines, digital cameras and so forth) that will also be subject to the enforcement of the new mandatory technical standards.

Trade

47. Regulation of the Minister of Trade No. 16 of 2025 on Import Policy and Provisions

Enforcement Date: 30 August 2025

Summary:

- This new framework retains the requirement for importers to secure Business Identification Numbers (*Nomor Induk Berusaha*/NIB), which also function as Importer Identification Numbers (*Angka Pengenal Importir* – “API”), either as General API (“API-U”) or Producer (“API-P”), with the option to convert between the two. However, the new Regulation has now scrapped the previous conversion criteria by removing the full import realization requirement and instead focusing on the current validity and realization status of import approvals or Surveyors’ Reports (*Laporan Suveyor* - “LS”).
- The new framework has also introduced a tiered sanctions system for certain violations, such as providing inaccurate information in license or certificate applications, importing goods without the required LS or importing products that differ from those stated in import licenses. Sanctions start with the issuance of written warnings and may escalate to one-year revocations of import licenses or certificates. In addition, under the new sanctions regime, recommendations for NIB revocations and restricted access to verifications or technical tracing services may also be issued.
- Furthermore, the new framework has now explicitly revoked existing import approvals for specific commodities, regardless of whether they were issued under API-U or API-P, including forestry products, plastic raw materials, subsidized fertilizers and certain types of fuel. Importers affected by this revocation will be required to submit new applications under the new framework, as all pending applications that were submitted under the previous framework will not be processed.

48. Regulation of the Minister of Trade No. 17 of 2025 on Import Policy and Provisions on Textiles and Textile Products

Enforcement Date: 30 August 2025

Summary:

- In essence, textiles and textile products that are subject to the import policy and provisions featured under this Regulation comprise the following: 1) Textiles, carpets and other textile floor coverings; 2) Batik textiles and batik-patterned textile products; 3) Other finished textile goods; and 4) Ready-made clothing and clothing accessories. These textiles and textile products are outlined comprehensively under Appendix I to this Regulation.
- In order to complete imports of textiles and textile products under specific tariff codes/Harmonized System (HS) codes and commodity descriptions, importers are required to secure an import business license in the form of an Import Approval (*Persetujuan Impor/PI*) prior to any goods entering official customs areas. Importers must also ensure that technical verifications or tracing are completed by a registered surveyor.
- In addition, all exports of textiles and textile products from Free Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*) and Bonded Warehouses (*Tempat Penimbunan Berikat/TPB*) must comply with import policies in terms of licensing, verifications and technical tracing and/or destination port requirements.

49. Regulation of the Minister of Trade No. 18 of 2025 on Import Policy and Provisions on Agricultural and Livestock Products

Enforcement Date: 30 August 2025

Summary:

- In essence, agricultural and livestock products that are subject to the import policy and provisions featured under this Regulation comprise the following: 1) Animals and animal products; 2) Rice; 3) Sugar; 4) Corn; 5) Garlic; and 6) Horticultural products. These agricultural and livestock products are outlined comprehensively under Appendix I to this Regulation. It should also be noted that efforts to ensure the availability of supplies and price stabilization measures may be implemented by State-Owned Enterprises and/or other types of business entities.
- In order to complete imports of agricultural and livestock products under specific tariff codes/Harmonized System (HS) codes and product descriptions, importers are required to secure an import business license in the form of an Import Approval (*Persetujuan Impor/PI*) prior to any goods entering official customs areas. Importers must also ensure that technical verifications or tracing are completed by a registered surveyor.
- In addition, all exports of agricultural and livestock goods from Free Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*) and Bonded Warehouses (*Tempat Penimbunan Berikat/TPB*)

must comply with import policies in terms of licensing, verifications and technical tracing, and/or destination port requirements.

50. Regulation of the Minister of Trade No. 19 of 2025 on Import Policy and Provisions on Salt and Fisheries Commodities

Enforcement Date: 30 August 2025

Summary:

- In essence, salt and fisheries commodities that are subject to the import policy and provisions featured under this Regulation comprise the following: 1) Salt; 2) Pearls; 3) Parent fish, fish seeds and/or pearl nuclei; and 4) Fisheries products. These salt and fisheries commodities are outlined comprehensively under Appendix I to this Regulation.
- In order to complete imports of salt and fisheries commodities under specific tariff codes/Harmonized System (HS) codes and commodity descriptions, importers are required to secure an import business license in the form of an Import Approval (*Persetujuan Impor/PI*) prior to any such goods entering official customs areas. Importers must also ensure that technical verifications or tracing are completed by a registered surveyor.
- In addition, all exports of salt and fisheries commodities from Free Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*) and Bonded Warehouses (*Tempat Penimbunan Berikat/TPB*) must comply with import policies in terms of licensing, verifications and technical tracing, and/or destination port requirements.

51. Regulation of the Minister of Trade No. 20 of 2025 on Import Policy and Provisions on Chemicals, Hazardous Substances and Mining Materials

Enforcement Date: 30 August 2025

Summary:

- In essence, chemicals, hazardous substances and mining materials that are subject to the import policy and provisions that feature under this Regulation comprise 11 forms of substances and materials, which include: 1) Lubricant raw materials; 2) Non-pharmaceutical precursors; 3) Crude oil and natural gas; 4) Ozone-depleting substances (*Bahan Perusak Lapisan Ozon/BPO*); 5) Hydrofluorocarbons (HFC); and 6) Certain types of chemicals (*Bahan Kimia Tertentu – “BKT”*). These substances and materials are outlined comprehensively under Appendix I to this Regulation.
- In order to complete imports of chemicals, hazardous materials and mining materials under specific tariff codes/Harmonized System (HS) codes and

specific goods descriptions, importers are required to secure a business license for imports in the form of a Registered Importer (*Importir Terdaftar/IT*) permit and an Import Approval (*Persetujuan Impor/PI*) prior to any goods entering official customs areas. Importers must also ensure that technical verifications or tracing are completed by a registered surveyor.

- In addition, all exports of chemicals, hazardous substances and mining materials from Free Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*) and Bonded Warehouses (*Tempat Penimbunan Berikat/TPB*) of the following types of goods: 1) Lubricant raw materials; 2) Cement clinker and cement; 3) Crude oil and natural gas; and 4) BKT, must comply with import policies in terms of licensing, verifications and technical tracing, and/or destination port requirements.

52. Regulation of the Minister of Trade No. 21 of 2025 on Import Policy and Provisions on Electronics and Telematics Products

Enforcement Date: 30 August 2025

Summary:

- In essence, electronics and telematic goods that are subject to the various import policies and provisions that feature under this Regulation comprise the following products: 1) Color multifunction machines, color photocopiers and color printers; 2) Mobile phones, handheld computers and tablet computers; 3) Electronics (whether based on cooling systems or not); and 4) Goods based on cooling systems. These electronics and telematic goods are outlined comprehensively under Appendix I to this Regulation.
- In order to complete imports of electronic and telecommunications goods under specific tariff codes/Harmonized System (HS) codes and product descriptions, importers are required to secure business permits for the field of importation, specifically Registered Importer (*Importir Terdaftar/IT*) and Import Approval (*Persetujuan Impor/PI*) permits prior to any relevant goods entering official customs areas. Importers must also ensure that technical verifications or inspections are completed by a registered surveyor.
- In terms of exports of any of the following types of goods: 1) Color multifunction machines, color photocopiers and color printers; 2) Mobile phones, handheld computers and tablet computers; and 3) electronics other than those based on cooling systems, from Free Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*) and Bonded Warehouses (*Tempat Penimbunan Berikat/TPB*), all such exports must comply with import policies in terms of licensing, verifications and technical tracing, and/or destination port requirements.

53. Regulation of the Minister of Trade No. 22 of 2025 on Import Policy and Provisions for Certain Types of Industrial Goods

Enforcement Date: 30 August 2025

Summary:

- This Regulation outlines a specific set of import policies and requirements that apply to the importation of the following types of industrial goods: 1) Iron or steel, guide steel and related derivative products; 2) Tires; 3) Semi-finished hand tools; 4) Ceramics; 5) Flat glass and safety glass; 6) Saccharin, cyclamate and prepare odors containing alcohol; 7) Raw materials for use in alcoholic beverages; 8) Downstream plastics; and 9) Valves.
- The importation of the above-outlined industrial goods in line with certain tariff posts/harmonized system and goods descriptions requires relevant importers to secure business permits in the form of Import Approvals (*Persetujuan Impor* - “**PI**”) prior to the entry of any relevant goods into official customs areas. In this regard, this Regulation also affirms that certain industrial goods will be subject to mandatory verifications or technical examinations.
- It should also be noted that these various types of industrial goods may also be imported as complimentary goods, goods that will be used for market testing purposes and/or goods that will be used for after-sales service purposes. Any such imports will be permitted once relevant PI have been secured and will also be subject to mandatory verifications or technical examinations.

54. Regulation of the Minister of Trade No. 23 of 2025 on Import Policy and Provisions on Consumer Goods

Enforcement Date: 30 August 2025

Summary:

- This Regulation outlines a set of specific import policies and requirements that apply to the importation of the following types of consumer goods: 1) Food and beverages; 2) Traditional medicines and health supplements; 3) Cosmetics and household healthcare supplies; 4) Toys; 5) Bags; 6) Alcoholic beverages; 7) Footwear; and 8) Two-wheeled and three-wheeled bicycles.
- In terms of imports of alcoholic beverages specifically (including beverages for personal consumption that are reported under the duty-paid and non-paid scheme), this Regulation requires relevant importers to secure permits for registered importers (*Importir Terdaftar* – “**IT**”) and import approvals (*Persetujuan Impor* – “**PI**”) prior to the entry of goods into official customs areas.

- Nevertheless, importers may be exempted from the various import policies and requirements that feature under this Regulation under the following conditions: 1) Imports are not being completed in relation to any business activities; and 2) Imports are being completed in relation to business activities by importers who have secured Business Identification Numbers (*Nomor Induk Berusaha/NIB*) that have applicability as Import Identification Numbers (*Angka Pengenal Impor/API*).

55. Regulation of the Minister of Trade No. 24 of 2025 on Import Policy and Provisions on Goods in Used Condition and Non-Hazardous and Toxic Waste

Enforcement Date: 30 August 2025

Summary:

- While normally goods that are permitted to be imported are in a new condition, this Regulation affirms that the Minister of Trade may also permit imports of goods in a used condition, as well as non-hazardous and toxic waste, in line with relevant Laws and Regulations. Imported goods that are in a used condition break down as follows: 1) Goods that are required by importers, that take the form of Capital Goods in a Used Condition (*Barang Modal dalam Keadaan Tidak Baru/BMTB*) and that cannot be provided by any domestic sources; 2) Goods that will be used as a part of recovery and rebuilding efforts in response to natural disasters; 3) Second-hand lithium batteries that are in one piece; 4) Non-Hazardous and Toxic Waste (*Bahan Berbahaya dan Beracun - "B3"*) in leftover, scarp or scrap form; and 5) Goods that are imported for specific purposes.
- All importers who import goods in a non-new and non-B3 condition are required to secure Producer Importer (*Importir Produsen - "IP"*) business licenses prior to the entry of any relevant goods into official customs areas. In addition, if said goods comprise lithium batteries, then IP will be issued based on the results of technical coordination meetings that are held in order to ensure the ability of the relevant companies to manage lithium batteries. A full list of requirements for IP applications is set out comprehensively under the Appendix to this Regulation.

56. Regulation of the Minister of Trade No. 25 of 2025 on Procedures for the Issuance of Franchise Registration Certificates by Regional Governments

Enforcement Date: 30 July 2025

Summary:

- Regulation 25/2025 establishes a uniform procedure for the issuance of Franchise Registration Certificates (*Surat Tanda Pendaftaran Waralaba* - “**STPW**”) by regional governments via the Online Single Submission (“**OSS**”) system. In this regard, regional government officials now have the authority to issue STPW. STPW may be issued to franchisees operating under domestic franchisors, as well as to sub-franchisees of foreign franchisors and sub-franchisees of domestic franchisors.
- In order to secure an STPW, a prospective franchisee must upload two types of documents to the OSS system (i.e. a Franchisee Registration Form and Franchise Agreement). The Franchise Agreement must contain 15 mandatory clauses covering various aspects that specifically relate to the operations of franchise businesses (e.g. intellectual property, business systems, number of outlets, etc.). These requirements will then be verified by the respective regional governments during the application process.
- STPW applications will undergo a two-stage verification process that will include: 1) Verification of the fulfilment of the requirements; and 2) Verification of the application approval. The entire verification process should be completed within five business days. However, if an STPW is not issued within this period, then a submission receipt issued through the OSS system may serve as temporary proof of valid franchise activity.

57. Regulation of the Director-General of Customs and Excise No. PER-8/BC/2025 on Procedures for the Export of Consignment Goods

Enforcement Date: 30 July 2025

Summary:

- The following types of postal service organizers (“**Organizers**”) are responsible for the fulfillment of various customs obligations that specifically relate to the export of consignment goods (both commercial and non-commercial goods): 1) Appointed Organizers (*Penyelenggara Pos yang Ditunjuk* – “**PPYD**”); and 2) Courier service companies (*Perusahaan Jasa Titipan* – “**PJT**”).
- Meanwhile, senders of goods that act as exporters of consignment goods will assume responsibility for the obligation to pay export duties and/or settle administrative sanctions in the form of fines. In this case, Organizers should act as Customs Service Management Companies (*Pengusaha Pengurusan Jasa Kepabeanan* – “**PPJK**”) during the processing of consignment goods and will be held liable for the payment of any duties or the fulfillment of sanction obligations in the event that an exporter cannot be explicitly identified.
- This Regulation affirms that exports of consignment goods should be declared through the submission of the following documents: 1) Consignment Notes (“**CN**”): for goods with gross weights that do not exceed 30 kg and that are exported by non-business exporters, as well as imported goods with previously declared CN that are to be re-exported; or 2) Export

notifications (*Pemberitahuan Ekspor Barang* – “**PEB**”): for goods with gross weights that exceed 30 kg.

- It should also be noted that the above-mentioned consignment goods may also be consolidated by Organizers (through the combining of multiple goods under two or more customs declarations) based on multiple CN through the electronic submission of consignment goods consolidation notifications (*Pemberitahuan Konsolidasi Barang Kiriman*/PKBK) prior to the relevant consignment goods entering customs areas for export loading.

58. Regulation of the Commodity Futures Trading Regulatory Agency No. 3 of 2025 on Procedures for the Implementation of Digital Gold Physical Market Trading Through the Futures Exchange

Enforcement Date: 25 June 2025

Summary:

- This new framework revises the various technical requirements that must be met by gold in order for it to qualify for trading through the Digital Gold Physical Market (“**Market**”). All such gold, which must be initially stored with a gold storage manager, must meet the following criteria: 1) Must have a minimum gold content of 99.9%; 2) Must be covered by certification that includes a serial code, logo and the relevant weight; 3) Must be available in standardized weight units of grams (“**g**”), i.e. 1 g, 2 g, 5 g, 10 g, 25 g, 50 g, 100 g, 250 g, 1,000 g and/or other gram units, as determined by the Market Clearing Institution; and 4) Must not be pledged, in dispute or have been sourced through any criminal activity, as proven through signed statements issued by the Director of Digital Gold Physical Traders (“**Traders**”) and/or digital gold participants.
- While retaining the transaction mechanism that is available through the market (i.e. transaction matching via the Digital Gold Futures Exchange or Traders), the new Regulation now classifies Traders into two capital-based categories, each with its own corresponding minimum level of paid-up capital and ending capital balance requirements. These classifications break down as follows: 1) Type-A Traders: a minimum level of paid-up capital amounting to Rp. 100 billion and an ending capital balance that must be maintained at a level of at least Rp. 50 billion; and 2) Type-B Traders: a minimum level of paid-up capital amounting to Rp. 50 billion and an ending capital balance that must be maintained at a level of at least Rp. 25 billion.
- This Regulation also grants the Commodity Futures Trading Supervisory Agency (*Badan Pengawas Perdagangan Berjangka Komoditi*/Bappebti) the authority to impose administrative sanctions upon relevant parties in response to any cases of non-compliance. These sanctions may take the form of written reprimands, fines, suspensions of business activities, registration cancellations and/or revocations of relevant licenses.

59. Decree of the Minister of Trade No. 1640 of 2025 on Export Benchmark Prices for Mining Products Subject to Export Duty

Enforcement Date: 11 July 2025 – 31 July 2025

Summary:

- This Decree outlines the applicable Export Benchmark Prices (*Harga Patokan Ekspor/HPE*) for a total of 269 copper concentrate products, as comprehensively listed under the Appendix to the Decree. These prices range from US\$ 1,548.49/WE to US\$ 7,633.03/WE.

Transportation and Logistic Services

60. Regulation of the Minister of Transportation No. PM 7 of 2025 on the Amendment to Regulation of the Minister of Transportation No. PM 87 of 2021 on Civil Aviation Safety Regulation Part 69 on Licensing, Ratings, Training and Proficiency of Air Navigation Personnel

Enforcement Date: 11 July 2025

Summary:

- In essence, this Regulation has now revised the applicable provisions originally set out under the framework of Regulation of the Minister of Transportation No. PM 87 of 2021 on Licensing, Ratings, Training and Proficiency of Air Navigation Personnel by bringing said provisions into line with Annex I of the International Civil Aviation Organization (ICAO).
- This new Regulation outlines five core aspects that specifically relate to licensing, ratings, training and proficiency requirements for the above-mentioned air navigation personnel ("**Personnel**"). These core aspects break down as follows: 1) Requirements for Personnel; 2) Licensing and rating of Personnel; 3) Validation of licenses for Personnel that are issued by other countries; 4) Types of education and training for Personnel; and 5) Authorities and obligations of license and rating holders for Personnel.

61. Decree of Minister of Marine Affairs and Fisheries No. 40 of 2025 on Ports of Implementation for Port State Measures

Enforcement Date: 9 July 2025

Summary:

- Previously, under the now-revoked framework of Decree of Minister Marine Affairs and Fisheries (“**Minister**”) No. 52/KEPMEN-KP/2020 (“**Decree 52/2020**”), the following ports were designated as port state measures in line with efforts aimed at preventing, deterring and eliminating illegal, unreported and unregulated (IUU) fishing in accordance with relevant Laws and Regulations: 1) Nizam Zachman Oceanic Fishing Port (Jakarta); 2) Bitung Oceanic Fishing Port; 3) Bungus Oceanic Fishing Port; and 4) Benoa Sea Port.
- However, under this new Decree, this list of ports designated as port state measures has now been expanded to a total of nine seaports through the incorporation of the following new ports onto the port state measure list: 1) Tanjung Perak Public Port (Surabaya); 2) Belawan Public Port (Medan); 3) Makassar Public Port (Makassar); 4) Panjang Public Port (Bandar Lampung); and 5) Marunda Public Port (North Jakarta).

62. Circular of the Director-General of Air Transportation No. SE-DJPU 11 of 2025 on Guidelines for the Issuance of Airport Passes to Protocol Officers (Representatives of Agencies/Entities)

Enforcement Date: 10 July 2025

Summary:

- This Circular features a set of guidelines for application by issuers of airport passes during the issuance process, including clarification regarding the parties categorized as eligible to receive passes. Specifically, said parties comprise personnel that are assigned to assist officials during the completion of certain activities within airports and that work for certain institutions (e.g. ministries, agencies and the national police force).
- The Circular also stipulates certain specific areas within airports that are accessible (e.g. domestic and international arrival zones, security checkpoints and domestic and international departure lounges). In this regard, it is important to note that access to international arrival and departure areas requires approvals or recommendations to be issued by immigration authorities.

63. Circular of the Director-General of Sea Transportation No. SE-DJPL 21 of 2025 on the Obligatory Implementation of on-Schedule Docking by Crossing Transportation Vessels

Enforcement Date: 11 July 2025

Summary:

- Owners and operators of crossing transportation vessels whose vessel certification falls within three months of the scheduled docking deadline must ensure that their docking is carried out on time and without delay. In this regard, the owners and operators of said crossing transportation vessels are also required to implement their passenger vessel renewal inspection checklist during vessel docking.
- It should also be noted that if crossing transportation vessels are to be used during Eid or Christmas and New Year transportation operations, then docking must be carried out prior to the implementation of said activities.
- Any owners and operators of crossing transportation vessels that are found to have violated either of the above-outlined obligations will be subject to the imposition of administrative sanctions.

64. Decree of the Director-General of Sea Transportation No. A.796/AL.308/DJPL of 2025 on Technical Guidelines for the Application of Description Letters Without Pilotage (Pilot Exemptions) for Captains Operating Crossing Transportation Vessels

Enforcement Date: 11 July 2025

Summary:

- In essence, description letters without pilotage certificates ("**Pilot Exemptions**") can be issued to captains of crossing transportation vessels ("**Vessels**") with a minimum of Gross Tonnage ("**GT**") of 500 in size within designated pilotage waters, as listed under the Appendix to this Decree. In this regard, the aforementioned Pilot Exemption certificates will be issued to captains who possess adequate competence and who are capable of meeting various requirements regarding the implementation of specific duties on specific vessels for specified periods.
- The procedure for the issuance of the above-mentioned Pilot Exemption certification is outlined comprehensively in the Appendix to this Decree. In essence, the procedure for the issuance of certification encompasses the following aspects: 1) Issuance process; 2) Criteria for eligible recipients; 3) Criteria for eligible Vessels; 4) Considerations regarding the issuance of Pilot Exemption certificates; and 5) Applicable administrative sanctions for non-compliance.
- Issued Pilot Exemption certificates will remain valid for six-month periods and are extendable, provided that the relevant Vessel captains remain eligible to secure said certification.

Miscellaneous

65. Regulation of the Government No. 29 of 2025 on Financial Aid for Victims of Crimes of Sexual Violence

Enforcement Date: 18 June 2025

Summary:

- In essence, financial aid funds that are available to victims of crimes of sexual violence (*Tindak Pidana Kekerasan Seksual* – “**TPKS**”) take the form of compensation (“**Financial Aid**”), should be provided in the form of cash and may be sourced from valid and non-binding sources of funds (e.g. philanthropy, the community, individuals, corporate social and environmental responsibility programs). Financial Aid should be utilized as compensation in the form of underpaid restitution (i.e. compensation that is charged to the perpetrator or relevant third party based on a final and binding court decision for material and/or immaterial losses suffered by a victim or their heirs) to TPKS victims and may also be utilized to fund recovery efforts.
- The above-described restitution should be provided within a maximum period of 30 days from the date upon which a copy of the relevant court decision or ruling is received. In this regard, the prosecutor is obliged to submit a copy of the relevant court decision that sets out the restitution order to the convicted person, the victim and the Witness and Victim Protection Agency (*Lembaga Perlindungan Saksi dan Korban* – “**LPSK**”) within seven days of receiving a copy of said court decision.
- If a convicted person is unable to pay the required restitution, then the prosecutor should notify the LPSK requesting payment of said unpaid restitution to the victim through Financial Aid within a maximum period of 30 days from the date upon which the relevant notification is received by the LPSK.
- In terms of the funding of the recovery of TPKS victims through Financial Aid specifically, this Regulation affirms that said funding should be granted based on written applications that are submitted by victims, victims’ families or their legal representatives. Upon receiving any such applications, the LPSK will subsequently assess the following matters: 1) The type of recovery required by the victim that has not been included in the restitution calculation; 2) Outreach regarding the fulfillment of the victim’s recovery rights through programs that are organized by relevant governmental ministries or agencies, as well as by regional governments; and 3) The availability of Financial Aid.

66. Regulation of the Minister of Finance No. 43 of 2025 on the Insurance of State-Owned Assets

Enforcement Date: 14 July 2025

Summary:

- While retaining the core provisions on the insurance of state-owned assets (*Barang Milik Negara* – “**BMN**”) that originally featured under the now-revoked framework of Regulation of the Minister of Finance No. 97/PMK.06/2019 (“**Regulation 97/2019**”), this new Regulation affirms that BMN remain insurable but must be in either a good condition or only lightly damaged, and must also fulfill the following criteria: 1) Must have an impact on public services if they are damaged or lost; 2) Must support the smooth execution of government duties and functions; 3) Must have an impact on processes of BMN optimization that involve other parties/agencies; and/or 4) Other criteria, as mandated under relevant Laws and Regulations.
- Although previously, Regulation 97/2019 only addressed BMN in the form of buildings as insurable objects, this new Regulation has now revised the list of insurable BMN objects into Program and Non-Program BMN. The latter of these two classifications is reserved for BMN for which insurance was not originally planned and comprises mandatory, overseas and optional BMN.
- The parties eligible to provide BMN insurance coverage break down as follows: 1) Consortiums (for Program BMN only); 2) Insurance companies; 3) Sharia insurance companies; and 4) Foreign insurance companies (this category is reserved for Non-Program BMN that are stipulated as overseas BMN and such a designation is only permitted if the relevant foreign company is recognized under its country’s Laws and Regulations).
- In terms of BMN insurance claims, this Regulation affirms that claims may be settled by providers of insurance services to either Program or Non-Program BMN the following forms: 1) Damage repairs; 2) Reconstruction; 3) Replacement; 4) Cash compensation; and/or 5) Other forms of settlement in accordance with relevant Laws and Regulations. Furthermore, in terms of Preferential BMN whose insurance premiums are funded from the pooled fund (*dana bersama*) specifically, BMN insurance claims should be settled by Program BMN insurance service providers in the form of cash compensation.

67. Regulation of the Minister of Tourism No. 2 of 2025 on Unified Tourism Sector Data

Enforcement Date: 10 July 2025

Summary:

- This Regulation classifies data into two main categories, specifically data that represents actual conditions and data related to information within the tourism sector. Data that represents actual conditions includes: 1) Statistical data; and 2) Geospatial data.
- The One Data System should be implemented within the tourism sector by the following parties: 1) Data Custodians (*Walidata*); and 2) Data Producers. Moreover, both of these types of parties should utilize the One Data Forum within the tourism sector as a platform for communication and coordination.

This forum is organized for various purposes (e.g. identification of datasets that will be designated as priority data).

68. Circular of the Director-General of General Legal Administration No. AHU-AH.01.04-01 of 2025 on the Expedited Ratification of the Establishment of and Changes to Articles of Associations of Foundation Legal Entities Engaged in the Provision of Free Nutritious Meals

Enforcement Date: 28 May 2025

Summary:

- This Circular officially adds “Free Nutritious Meals” to the list of activities featured in the Legal Entity Administration System (*Sistem Administrasi Badan Hukum* – “**SABH**”) and applies to foundations that wish to participate in the Free Nutritious Meal (*Makanan Bergizi Gratis* – “**MBG**”) program. In this regard, notaries and relevant SABH service users who wish to become MBG program partners are required to click the “Free Nutritious Meal” option in the SABH upon submitting an application for the ratification of the respective foundation.
- Moreover, notaries are also required to fill out several forms and click the “Free Nutritious Meal” button in the relevant activities section upon submitting an application for the ratification of the establishment of a foundation or changes to the relevant foundation’s articles of association.

69. Circular of the Main Secretary of the Indonesian Quarantine Agency No. 6151 of 2025 on Guidelines on the Enforcement of Regulation of the Indonesian Quarantine Agency No. 14 of 2024 on Integrated Quarantine Measures and Supervision Procedures

Enforcement Date: 3 June 2025

Summary:

- The requirement to submit early notifications in the form of prior notices, as originally mandated under the framework of Regulation of the Indonesian Quarantine Agency No. 14 of 2024 (“**Regulation 14/2024**”) for Quarantined Animal Pest and Disease (*Hama dan Penyakit Hewan Karantina* – “**HPHK**”) Carriers is set to be implemented on a gradual basis. In this regard, any imports that are not currently accompanied by prior notices will not be rejected at their official points of entry. However, quarantine measures will continue to be implemented through profiling and guidance for relevant businesses.
- Currently, not all countries have entered into cooperation with Indonesia regarding provisions on signatures and animal health certification

specimens, or animal product sanitation certification. As a result, all carriers of HPHK will continue to be subject to quarantine measures.