Regulation Summary - June 2025

General Corporate

1. **Regulation of the Government No. 28 Tahun 2025 on the Organization of Risk-Based Business Licensing**

Enforcement Date: 5 June 2025

Summary:

- Regulation of the Government No. 28 of 2025 on the Organization of Risk-Based Business Licensing ("**Regulation 28/2025**") has now expanded the implementation of risk-based business licensing from 16 to 22 sectors. Despite this expansion, the two-phase structure of business activities — i.e. the founding and operation of a business — remains unchanged, although clearer substages and more detailed procedures have now been introduced.
- A key innovation of Regulation 28/2025 is the formal separation of General Business Licensing (*Perizinan Berusaha* – "**PB**") from Business Licenses to Support Business Activities (*Perizinan Berusaha untuk Menunjang Kegiatan Usaha* – "**PB-UMKU**"), with different authorities being assigned accordingly. In addition, the Online Single Submission ("**OSS**") system has now been enhanced through the introduction of three new service subsystems.
- Moreover, for the first time, Regulation 28/2025 has introduced a fully structured, umbrella framework for the imposition of administrative sanctions in response to violations of basic requirements relating to PB and PB UMKU. Sanctions now range from the issuance of warnings to full license revocations and must be imposed by authorized officials via the OSS platform.

2. **Regulation of the Minister of Law No. 18 of 2025 on Procedures for the Submission of Applications for the Ratification of and Amendments to Articles of Associations of and Terminations of Legal Associations**

Enforcement Date: 28 May 2025

Summary:

- While retaining the requirement for legal associations ("**Associations**") to first secure approvals for their names prior to securing ratifications, this new framework now requires applicants to also provide information relating to

the background to their names and the purpose for the establishment of their Associations, as well as the registered domiciles of Associations during the securing of approvals for their names. Moreover, this framework also introduces several new aspects that specifically relate to naming requirements, including: 1) Local or foreign languages may be utilized for Association names, provided that said names are associated with certain values; 2) The use of certain names by Associations may require the relevant applicants to enclose supporting documents; and 3) Applicants must fill out a section stating that said applicants will assume full responsibility for the requested Association names.

- In terms of securing a ratification for an Association after an approval has been secured for the use of its name, this new framework now also requires relevant applicants to provide lists of Association members who have voting rights at general meetings (or in other equivalent terms) in addition to the list of documents that were required under the previous framework. Moreover, this framework newly clarifies that Association ratification applications must be submitted within 30 calendar days of the signing of the relevant official deeds of establishment.
- Newly clarified under this framework, Associations may now submit applications to the Minister via the Legal Entity Administration System (*Sistem Administrasi Badan Hukum*/SABH) if they are looking to officially terminate their legal status. In this regard, relevant Associations are required to provide various documents and information relating to themselves as entities. Said required documents and information include: 1) Minutes of a members' meeting that addresses the dissolution of the Association, as approved by the members based on the quorum stipulated in the relevant Articles of Associations; 2) List of Association members who have voting rights at general meetings; 3) Announcement of the dissolution (and liquidation in the event of a bankruptcy) through an Indonesian-language mass media outlet; and so forth).

3. Circular of the Director-General of Immigration No. IMI-417.GR.01.01 of 2025 on Revised Immigration Stay Permit Services

Enforcement Date: 29 May 2025

Summary:

- This Circular outlines the authority and responsibilities of Immigration Officials in terms of the management of stay permits and related immigration applications. This includes taking receipt of applications that are submitted by foreign nationals, guarantors or persons in charge either electronically or manually. However, manual or walk-in submissions are restricted to specific categories of foreign nationals, such as the elderly, individuals with disabilities and pregnant or nursing mothers.
- Immigration personnel are further tasked with verifying the completeness of all submitted documents, a process that may be carried out through the immigration system or at service counters following payment of immigration

fees. Ultimately, these officials are authorized to determine whether an application is complete or should be rejected, and to proceed with the necessary follow-up procedures accordingly.

Banking

4. Circular of the Financial Services Authority No. 8/SEOJK.03/2025 on the Application of the Compliance Function by Rural Banks and Sharia Rural Banks

Enforcement Date: 26 May 2025

Summary:

- This Circular stipulates that all board of directors' members who assume responsibility for the compliance function ("**Compliance Directors**") at rural banks (*Bank Perekonomian Rakyat* – "**BPR**") and sharia rural banks (*Bank Perekonomian Rakyat Syariah* – "**BPRS**") with minimum levels of core capital that amount to Rp. 50 billion must remain independent and must refrain from handling any operational activities (e.g. fund disbursement). However, in terms of BPR and BPRS with levels of core capital that fall below Rp. 50 billion, the relevant Compliance Directors are also prohibited from participating in any operational decision-making.
- Compliance Directors must submit task implementation reports twice annually by a deadline of 31 January for the December report and 31 July for the June report via the Financial Services Authority's (*Otoritas Jasa Keuangan*/OJK) online reporting system (*Aplikasi Pelaporan Online* OJK – "**APOLO**"). Additionally, if any board policies or decisions are found to deviate from applicable Regulations and pose a risk to the overall sustainability of BPR or BPRS, then Compliance Directors must promptly draw up special reports within 10 working days and submit them via APOLO.

5. Circular of the Financial Services Authority No. 9/SEOJK.03/2025 on the Application of the Internal Audit Function by Rural Banks and Sharia Rural Banks

Enforcement Date: 26 May 2025

Summary:

- This Circular stipulates that the Internal Audit Units (*Satuan Kerja Audit Intern* - "**SKAI**") of rural banks (*Bank Perekonomian Rakyat* – "**BPR**") and

sharia rural banks (*Bank Perekonomian Rakyat Syariah* – "**BPRS**") should be led by heads with a ranking of Executive Officer. However, if a BPR or BPRS is not required to have an SKAI, then the internal audit function should be executed by the Executive Officer for Internal Audits (*Pejabat Eksekutif Audit Intern*/PE Audit Intern).

- Audit and examination processes are implemented in three main phases: 1) Planning (e.g. preparation of an audit plan and issuance of an audit notification); 2) Implementation (fieldwork) (e.g. collection of relevant evidence and information); and 3) Follow-up monitoring (e.g. analysis of the adequacy of corrective actions and preparation of follow-up reports).

Capital Market

6. Circular of the Financial Services Authority No. 5/SEOJK.04/2025 on Reporting Guidelines for Mutual Fund Selling Agents and Commercial Banks as Custodians

Enforcement Date: 27 December 2025

Summary:

- This Circular stipulates that all mutual fund selling agents (*agen penjual efek reksa dana*) must draw up and submit the following two types of reports to the Financial Services Authority (*Otoritas Jasa Keuangan* – "**OJK**"): 1) Annual reports, to be submitted by 15 January of the reporting year in accordance with the format of the ongoing business activity plan; and 2) Monthly reports, to be submitted by the 15th day of the month following the relevant reporting month.
- In addition, the Circular also requires custodian banks to submit the following types of reports to the OJK: 1) Periodic reports, which comprise monthly reports and which should be submitted by the 15th day of the month following the relevant reporting month; and annual reports, which should be submitted within 90 days of the end of the relevant reporting period; and 2) Incidental reports that address branch openings of custodian services, any changes that are made to the relevant responsible custodian officers and/or any changes that are made to the structure of the relevant custodian institution, all of which must be submitted within seven working days of any such opening or change occurring.

7. Circular of the Financial Services Authority No. 6/SEOJK.04/2025 on Guidelines for the Reporting of and Contracts for the Receipt and Granting of Mutual Fund Loans

Enforcement Date: 9 May 2025

Summary:

- Mutual funds are required to draw up loan receipt reports and loan disbursement reports that will serve as a recapitulation of all loan transactions that are granted and/or received by the relevant mutual funds within a given reporting period, including those still outstanding from the previous period. These reports must be submitted to the Financial Services Authority (*Otoritas Jasa Keuangan* – "**OJK**") by the 15th day of the month following the relevant reporting month.
- In addition, each mutual fund loan transaction must be based on a written contract that has been drafted by investment managers. In the event that a lender is the same investment manager who is responsible for the management of the borrowing mutual fund, then the contract must be signed by said investment manager, by the custodian bank in its capacity as the representative of the borrower, as well as by the investment manager in its lending capacity.

8. Circular of the Financial Services Authority No. 10/SEOJK.04/2025 on Electronic Submissions of Reports on Share Ownership and Changes to the Share Ownership of Public Companies and Reports on Share Pledging Activity Undertaken by Public Companies

Enforcement Date: 5 December 2025

Summary:

- The Financial Services Authority (*Otoritas Jasa Keuangan* – "**OJK**") has now clarified a detailed set of procedures for the submission of reports on share ownership and changes to the share ownership of public companies ("**Ownership Reports**"), as well as reports on share pledging activity undertaken by public companies ("**Pledging Reports**"). Ownership reports must be submitted by the following parties: 1) Members of the boards of directors or boards of commissioners of public companies who own shares with voting rights; 2) Parties in possession of a minimum of 5% of shares with voting rights; 3) Controlling shareholders with voting rights; and 4) Shareholders who are experiencing decreases in public company share ownership to levels of less than 5%.
- Meanwhile, Pledging Reports must be submitted by shareholders in public companies who engage in pledging activities in relation to their shares. These two types of reports must be submitted within three days of any acquisition of shares, changes in share ownership or signing of pledging agreements with the OJK. Moreover, reports should be submitted through an electronic system provided by the OJK via PT Kustodian Sentral Efek Indonesia (PT KSEI) and the Indonesian Stock Exchange (*Bursa Efek Indonesia*/BEI).

- In cases where technical disruptions or force-majeure events occur, then reports may be submitted via email or directly to the OJK's head office. However, electronic submissions will still have to be completed within five working days of any such technical disruption being resolved.

9. Rule No. I-X – Decree of the Board of Directors of the PT Bursa Efek Indonesia Board of Directors No. KEP-00035/BEI/06-2025 on the Placement of Equity Securities Listings on the Special Monitoring Board

Enforcement Date: 3 June 2025

Summary:

- This new Rule stipulates a transitional period for fulfillment of the minimum free-float share requirements by companies that are listed on the Acceleration Board. Said requirements are set to come into full effect on 31 October 2025. In addition, the Rule provides a trading suspension exemption for companies that only meet the negative equity criteria. This exemption will remain valid until 30 June 2026.
- The provision on the distribution of cash dividends as a requirement for removal from the Special Monitoring Board now explicitly includes interim dividends and also applies to dividends that are paid up to a maximum of one year prior to the issuance of this decision (which occurred on 3 June 2025). In addition, any companies that have already submitted their delisting applications and received approvals from their independent shareholders are also eligible to be removed from the Special Monitoring Board.

10. Draft Regulation of Financial Services Authority on the Organization of Investment Management Business Activities

Enforcement Date: -

Summary:

- In addition to various other activities that have been approved by the Financial Services Authority (*Otoritas Jasa Keuangan* - "**OJK**"), the Draft Regulation now affirms that investment managers may only engage in the following main business activities: 1) The management of securities portfolios for individual customers; 2) The management of collective investment portfolios for groups of customers; and/or 3) The management of other types of investment portfolios for customers; and 4) Other activities, as determined and/or approved by the OJK.
- Under the Draft Regulation, investment managers have now been classified into two categories that break down as follows: 1) Business Activity

Investment Managers (*Manajer Investasi Kegiatan Usaha* – "**MIKU**") 1: allowed to carry out seven types of business activities (e.g. securities portfolios that are managed in the interests of individual clients, money market mutual funds that are invested solely in domestic money market instruments in the form of deposits and so forth); and 2) MIKU 2: only allowed to manage investment products. The requirements that investment managers are required to meet include a minimum paid-up capital of Rp. 25 billion, while the level set for MIKU 2 has been set at Rp. 50 billion rupiah.

- If it is ultimately enforced, then this Draft Regulation will ultimately replace a total of six regulatory frameworks that specifically relate to investment managers, as issued by the Capital Market Supervisory Agency and Financial Institutions (*Badan Pengawas Pasar Modal dan Lembaga Keuangan*/Bapepam-LK), as well as by the OJK. Said frameworks include Regulation of the OJK No. 17/POJK.04/2022 on Guidelines on the Activities of Investment Managers.

Employment

11. Regulation of the Minister of Manpower No. 5 of 2025 on the Amendment to Regulation of the Minister of Manpower No. 10 of 2022 on Guidelines for the Provision of Government Assistance in the Form of Wage/Salary Subsidies to Workers/Laborers

Enforcement Date: 3 June 2025

Summary:

- The eligibility criteria for workers to receive government aid in the form of salary/wage subsidies (*Bantuan Subsidi Upah* – "**BSU**") have now been revised. Workers are now required to meet the following criteria: 1) Must be Indonesian citizens; 2) Must be active participants in the Social Security Agency for Employment (*BPJS Ketenagakerjaan*) program as of April 2025; and 3) Must earn a minimum monthly wage of Rp. 3.5 million.
- Furthermore, BSU are no longer available to all state civil apparatus (*Aparatur Sipil Negara*/ASN) employees, expanding the previous restriction that applied only to civil servants (*Pegawai Negeri Sipil*/PNS). Instead, BSU is being prioritized solely for workers who have not received any assistance through the Hopeful Family Program (*Program Keluarga Harapan*/PKH).
- In terms of distribution, BSU will now be distributed as cash payments of Rp. 300,000 per month for periods of two months and will be paid as a lump sum. Furthermore, the inclusion of 16 new provinces with minimum wages that exceed Rp. 3.5 million has also been introduced. For workers in these regions, the wage eligibility ceiling has been adjusted upward to match the rounded-up local minimum wage.

12. Circular of the Minister of Manpower No. M/6/HK.04/V/2025 on the Prohibition of Discrimination During the Worker Recruitment Process

Enforcement Date: 28 May 2025

Summary:

- This Circular prohibits employers from engaging in any discriminatory practices during the recruitment of workers. In this regard, employers are prohibited from incorporating any age and disability-related requirements into their worker recruitment processes.
- However, this Circular continues to allow employers to incorporate age requirements into their recruitment processes, provided that said requirements serve the following special conditions: 1) Jobs or positions with characteristics or of a nature for which age can clearly affect a person's ability to carry out the work in question; and/or 2) Must not result in any loss or reduction of opportunities in terms of securing employment.

13. Decree of the Minister of Manpower No. 149 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Category of Professional, Scientific and Technical Activities in the Professional, Scientific and Other Technical Activities Main Group in the Nuclear Energy Sector, Radioisotope and Radiopharmaceutical Production Sub-Sector

Enforcement Date: 5 June 2025

Summary:

- This Decree stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* – "**SKKNI**") for the subsector of radioisotope and radiopharmaceutical production within the nuclear energy 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 63 relevant competence units are outlined under the Appendix to the Decree, including: 1) Conducting of readiness checks and verifications of raw materials in relation to the production of radioisotopes and/or radiopharmaceuticals; 2) Performing of target testing in relation to radioisotopes for nuclear reactors; 3) Performing of irradiation with specific currents in accordance with the relevant activities; 4) Performing of fumigation and/or sanitation prior to production; and 5) Monitoring of radiopharmaceutical working production environments.

14. Decree of the Minister of Manpower No. 150 of 2025 on the Stipulation of Indonesian National Competency Standards for the Category of Processing Industry Main Groups of Leather Industry, Leather Goods and Footwear Industry Within the Leather Processing Industry Sector

Enforcement Date: 5 June 2025

Summary:

- This Decree stipulates Indonesian National Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* - "**SKKNI**") for the category of processing industry main groups of leather industry, leather goods and footwear industry within the leather processing industry sector, which can be used by the following relevant parties for reference purposes: 1) Educational institutions (e.g. provision of information for program development); 2) Business actors (e.g. assisting in recruitment, working assessments and the development of training programs); and 3) Organizers of testing and certification institutions (e.g. preparation of packages for certification programs and the organization of training and certification). Details of the SKKNI are comprehensively elaborated upon under the Appendix to the Decree.
- A total of 50 competence units are listed under the Appendix to the Decree, including units that address the following areas: 1) Processes related to leather preservation; 2) Analysis of leather tanning (*penyamakan*) results; 3) Operation of various processing machines; and so forth.

Energy

15. Regulation of the Minister of Energy and Mineral Resources No. 14 of 2025 on Management Cooperation in Working Areas to Increase Oil and Natural Gas Production

Enforcement Date: 10 June 2025

Summary:

- In an effort to increase domestic oil-and-gas production, oil-and-gas contractors ("**Contractors**") are now permitted to enter into partnerships in order to manage their working areas. Said partnerships should be implemented under cooperation agreements and may take the following forms: 1) Operational and/or technological cooperation; 2) Oil-well production cooperation; 3) Cooperation relating to the exploitation of crude oil mining at old wells; or 4) Other forms of cooperation.

- Operational and/or technological cooperation is carried out between Contractors and business entities or Permanent Establishments *(Bentuk Usaha Tetap*/BUT) (collectively referred to as "**Partners**") within the following permitted areas: 1) Idle wells; 3) Producing wells; 3) Idle fields/structures; and/or 4) Producing fields/structures. Partners must meet various administrative, technical and financial requirements and also bear various general related costs during the implementation of any cooperation.
- Furthermore, oil-well production cooperation may involve Regionally Owned Enterprises (*Badan Usaha Milik Daerah* – "**BUMD**"), Cooperatives, or Micro-, Small- or Medium-Scale Enterprises ("**MSME**") (collectively referred to as "**Local Entities**") during a temporary handling period that will extend until 10 June 2029. Under the cost recovery scheme, Contractors must pay Local Entities compensation amounting to 80% for all crude oil submissions, while under the gross-split scheme, Contractors' pre-tax share has been set at 93%. In addition, this type of cooperation requires Local Entities to provide compensation amounting to up to 70% of the Indonesian Crude Price to community members who are responsible for the direct operation of wells.

16. Circular of the Director of Oil-and-Gas Technical and Environmental Affairs No. 7.E/MG.06/DMT/2025 on Assessments of Oil-and-Gas Safety Management Systems and the Oil-and-Gas Safety Awards 2025

Enforcement Date: 19 May 2025

Summary:

- This Circular mandates that all contractors working under oil-and-gas production sharing contracts ("**Contractors**") and business entities that have secured downstream oil-and-gas business licenses ("**Business Entities**") will now be required to organize and utilize Oil-and-Gas Safety Management Systems (*Sistem Manajemen Keselamatan Migas* – "**SMKM**"). In this regard, Contractors and Business Entities should complete self-assessments of their SMKM implementation by no later than 30 June 2025 in line with the following stages: 1) Access the following website: www.keselamatanmigas.id and download the System Implementation Assessment Form ("**Form**"); 2) Complete the downloaded Form; and 3) Submit the relevant assessment results by uploading the completed Form along with supporting evidence and links to relevant documents via the website.
- This Circular also states that relevant parties may apply as nominees for the following awards, which will be presented at the Oil-and-Gas Safety Awards 2025: 1) The Patra Nirbhaya Karya Award; 2) Patra Karya Raksa Award; and 3) The Patra Prakarsa Award. In this regard, relevant parties should register and upload the required documents via: www.keselamatanmigas.id by no later than 31 July 2025 in line with the procedures that are set out under Decree of the Minister of Energy and

Mineral Resources No. 130.K/MG.01/MEM.M/2024 on Guidelines for the Granting of Oil-and-Gas Safety Awards ("**Decree 130/2024**"). The assessment process will conclude on 29 August 2025.

17. Decree of the DDirector of Oil-and-Gas Technical and Environmental Affairs as Head of Oil-and-Gas Inspections No. 44.K/MG.06/DMT/2025 on Procedures for Evaluations of the Implementation of Oil-and-Gas Safety Management System Applications

Enforcement Date: 14 May 2025

Summary:

- Oil-and-Gas Safety Management System (*Sistem Manajemen Keselamatan Minyak dan Gas Bumi* – "**SMKM**") compliance assessments ("**SMKM Assessments**") should be completed on an annual basis and involve the submission of self-assessments by Companies. In addition, the Director of Oil-and-Gas Engineering and Environment, who also serves as the Head of Oil-and-Gas Inspections ("**Inspection Head**") reserves the right to initiate assessments at any time that they deem necessary, regardless of whether a Company has already submitted a self-assessment or not.
- Self-assessments must be submitted to the Inspection Head by no later than 1 March for the previous assessment year. Following said submission, a verification process will be initiated by an assessment team appointed by the Inspection Head. This assessment team will subsequently draw up a structured SMKM assessment evaluation report, which must be submitted to the Inspection Head within 30 calendar days of the completion of the verification process and issuance of official SMKM assessment results.
- The SMKM assessment results are categorized into six ratings, which range from "Outstanding" to "Poor", with each being associated with corresponding total and core substance scores. In order to ensure appropriate follow-ups, Companies are also required to submit corrective action plans within 30 calendar days of receiving their SMKM assessment results. This plan should outline an implementation timeline and the appointed personnel who will assume responsibility for the enactment of the action plan.

Environment

18. Regulation of the Government No. 26 of 2025 on Environmental Protection and Management Planning

Enforcement Date: 5 June 2025

Summary:

- Environmental Protection and Management (*Perlindungan dan Pengelolaan Lingkungan Hidup* – "**PPLH**") is organized in three stages, which include environmental inventory, determinations of ecoregion areas and the preparation of Environmental Protection and Management Plans (*Rencana Perlindungan dan Pengelolaan Lingkungan Hidup* – "**RPPLH**"). The environmental inventory is compiled through the collection of data across various geographical levels and forms the basis for the identification of ecoregions, i.e. areas that share similar climates, soil, water conditions, biodiversity and patterns of human interaction that reflect the integrity of natural ecosystems.
- Meanwhile, RPPLH break down into national-, provincial- and district-level RPPLH, which encompass the following stages: 1) Identification of PPLH potential and problems; 2) Preparation of PPLH scenarios; 3) Formulation of RPPLH; and 4) Stipulation of RPPLH. RPPLH serve as a reference during the preparation of long-term and medium-term development plans, and are also the foundation for the sustainable use of natural resources.
- In addition, the government will establish a planning information system for environmental protection and management, which must process the following components at the minimum: 1) Environmental inventory data; 2) Defined ecoregion areas; 3) Environmental carrying capacity and load capacity assessments; 4) The RPPLH itself; and 5) The results of any monitoring and evaluation that specifically relate to PPLH planning.

General Financial Services

19. Regulation of the Minister of Finance No. 33 of 2025 on the Purchase of Collateral or Other Assets by Government Creditors Through Auctions for the Purpose of Managing State Receivables

Enforcement Date: 4 September 2025

Summary:

- This Regulation sets out the legal basis for government creditors (i.e. government agencies that delegate the management of receivables to the State Receivables Affairs Committee [*Panitia Urusan Piutang Negara* – "**PUPN**"]) to purchase collateral or other debtor-owned assets through PUPN Execution Auctions. Such purchases are permissible if assets have failed to sell during at least two auctions and must not exceed the relevant outstanding receivable values.

- Purchases should be completed through compensation (i.e. by deducting the auction price from the relevant debtor's obligations). In this regard, the relevant government institution must hold the purchasing authority or written approval and must assign an official to represent it at the auction. All purchase-related documents (e.g. settlement calculation sheets, handover reports and auction minutes) are required to be presented in order for an asset to be listed as state property.

20. Regulation of the Minister of Finance No. 40 of 2025 on Financing Services at the Public Service Agency of the Government Investment Center at the Ministry of Finance

Enforcement Date: 20 June 2025

Summary:

- The Public Service Agency of the Government Investment Center (*Badan Layanan Umum Pusat Investasi Pemerintah* – "**BLU PIP**") under the Ministry of Finance offers financing services that encompass financing for micro-, small- and medium-scale enterprises ("**MSME**"). Said financing may be provided through several schemes, which include: 1) Conventional loans; 2) Sharia financing; and 3) Financing based on profit sharing.
- In addition to the aforementioned financing schemes, BLU PIP may also extend MSME financing services through cooperation with regional governments and/or other entities. This may include direct-distribution conventional loans with effective annual interest rates that have been capped at a maximum of 4%, as well as direct-distribution sharia financing that is charged a rate in the form of the highest yield equivalent to the conventional loan rate in accordance with the relevant agreement.
- These financing service schemes may also be allocated to special financing purposes with 0% applicable service tariff, including: 1) Support for business actors that have been affected by force-majeure events; 2) Support for economic or post-disaster recovery efforts; and/or 3) Support for the implementation of priority government programs.

21. Circular of the Indonesian Financial Transaction Reports and Analysis Center No. 6 of 2025 on the Amendment to Circular of the Indonesian Financial Transaction Reports and Analysis Center No. 8 of 2016 on Procedures for the Submission of Integrated Customer Information via the Integrated Customer Information System Reporting Application

Enforcement Date: 21 May 2025

Summary:

- This Circular affirms that the Financial Transaction Reports and Analysis Center's reporting application has now shifted from GRIPS, as specifically addressed under Circular of the Indonesian Financial Transaction Reports and Analysis Center No. 8 of 2016 ("**Circular 8/2016**") on Procedures for the Submission of Integrated Customer Information via the Integrated Customer Information System Reporting Application (*Sistem Informasi Pengguna Jasa Terpadu* – "**SIPESAT**"), to goAML. This transition means that all financial service providers are now required to register as reporting parties through: https://goaml.ppatk.go.id. As a result, access to SIPESAT, which previously relied on GRIPS login credentials, now requires goAML credentials.
- Accordingly, any customer information that is submitted via SIPESAT, including by financial service providers that were already operational prior to the enactment of this Circular, must include initial data on all customers as of June 2025. Furthermore, the switch from GRIPS to goAML also will also affect the submission of SIPESAT information under certain conditions. In addition, while most of the applicable reporting requirements originally set out under Circular 8/2016 remain the same, this new Circular no longer addresses the correction of SIPESAT information.

22. Draft Regulation of the Financial Services Authority on the Implementation of Governance and Risk Management Within the Financial Technology Innovation Sector

Enforcement Date: -

Summary:

- This new Draft Regulation affirms that all parties that implement financial technology innovations (*Inovasi Teknologi Sektor Keuangan* – "**ITSK**") must work to ensure good governance across all levels and tiers of their organizations. Said governance must be based on the following principles at the least: 1) Transparency; 2) Accountability; 3) Responsibility; and so forth.
- The Draft Regulation also details the various ways in which governance should be implemented, including: 1) Active supervision, as undertaken by boards of directors and boards of commissioners; 2) Implementation of risk management, compliance, internal audits, external audits and operational procedures by all ITSK providers; 3) Management of any conflicts of interest; and so on. In addition, ITSK providers are also required to ensure that they remain well-informed of dynamics and developments across the industry in order to ensure that their good governance practices continue to advance.
- Once promulgated, the Draft Regulation will revoke various provisions that address the governance obligations for alternative credit scorers, as currently set out under Regulation of the Financial Services Authority No. 29 of 2024 on Alternative Credit Ratings ("**Regulation 29/2024**"). The new framework will also revoke various provisions that apply to financial services

aggregators, as currently set out under Regulation of the Financial Services Authority No. 4 of 2025 on Financial Services Aggregation Providers ("**Regulation 4/2025**").

23. Draft Circular of the Financial Services Authority on the Monthly Reporting of Bullion Business Activities by Organizers

Enforcement Date: -

Summary:

- Financial Service Institutions (*Lembaga Jasa Keuangan*/LJK) that engage in bullion-related business activities ("**Organizers**") will soon be required to submit monthly reports on the implementation of said business activities ("**Monthly Reports**"). These Monthly Reports are broken down into four report types, specifically: 1) Details of the disbursement of gold financing; 2) Details of the management of gold savings; 3) Details of gold trading activities; and 4) Details of gold custody activities.
- Monthly Reports should be drawn up in line with certain general requirements that are set out under Appendix I to the Draft Circular. Organizers must appoint a member of their Board of Directors ("**BoD**") to assume responsibility for Monthly Reports. Said BoD member will then assign an employee who will prepare, verify and submit the Monthly Reports to the OJK.
- Organizers should submit their Monthly Reports online by the 10th day of the month following the relevant reporting month via the OJK's data communications network system as part of their periodic reporting requirements. However, if the network system is unavailable and/or is experiencing technical problems, then Monthly Reports may be submitted via email or physical deliveries.

Infrastructure and Construction Services

24. Regulation of the Coordinating-Minister for Economic Affairs No. 7 of 2025 on the Third Amendment to Regulation of the Coordinating Minister for Economic Affairs No. 1 of 2022 on Guidelines for the Implementation of Community Business Credit

Enforcement Date: 19 May 2025

Summary:

- The Coordinating-Minister for Economic Affairs has stipulated a regulatory framework that governs the distribution of Community Business Credit (*Kredit Usaha Rakyat* - "**KUR**"). KUR can be disbursed by KUR distributors (i.e. financial institutions and cooperatives) on the condition that they are healthy and performing well, cooperate with KUR guarantors/insurers and have electronic systems in place that integrate KUR data into the Credit Program Information System (*Sistem Informasi Kredit Program* – "**SIKP**").
- Any financial institutions or cooperatives that are interested in becoming KUR distributors must apply to the authorized state institution, cooperate with KUR guarantors/insurers, apply to the organizing ministry and enter into financing cooperation agreements with the KUR budget user authority.
- In addition, this new framework also sets out various requirements for KUR guarantors/insurers (i.e. guarantor companies, credit insurance companies and other companies), which must be healthy and performing well, must cooperate with financial institutions and/or cooperatives in terms of KUR guarantees/insurance and must have electronic KUR-data systems in place that have been integrated into the SIKP.

25. Circular of the Head of the National Public Procurement Agency No. 1 of 2025 on the Elucidation of the Implementation of Regulation of the President No. 46 of 2025 on the Second Amendment to Regulation of the President No. 16 of 2018 on Procurements of Government Goods/Services During the Transition Period

Enforcement Date: 2 June 2025

Summary:

- This Circular clarifies that all Implementing Regulations that relate to Regulation of the President No. 46 of 2025 on the Second Amendment to Regulation of the President No. 16 of 2018 on Procurements of Government Goods/Services (collectively referred to as "**Regulation 46/2025**") during the transitional period will remain in force, provided that said implementing frameworks do not contradict and/or have not been specifically replaced by Regulation 46/2025.
- The Decree has also now clarified the implementation of a total of nine new and amended provisions, as well as various provisions that are inconsistent with the framework of Regulation 46/2025. These clarified provisions include: 1) The obligation of the budget user's authority to possess knowledge of procurements of goods/services and knowledge of the duties of commitment-making officials, which can be proven through possession of Basic/Level 1 Procurement Certification, among other available types of proof; 2) The minimum qualification requirements for provider performance, including the availability of performance assessment results through the Provider Performance Information System; and 3) The continued implementation of e-purchasing through online stores that are part of the electronic catalog.

Land & Property

26. Regulation of the Public Housing Savings Management Agency No. 2 of 2025 on Participation in the Public Housing Savings Program

Enforcement Date: 12 June 2025

Summary:

- In essence, this new framework repeals and replaces Regulation of the Public Housing Savings Management Agency (*Badan Pengelola Tabungan Perumaham Rakyat* – "**BP Tapera**") No. 4 of 2021 on Participation and Savings in the Public Housing Savings Program ("**Regulation 4/2021**"). However, it should be noted that although the new Regulation has been in effect since 12 June 2025, any returns on savings and yields from accrued savings that were already being processed prior to its introduction will continue to be administered in line with Regulation 4/2021.
- In comparison with Regulation 4/2021, this new Regulation now introduces clearer classifications for workers and independent workers. Currently, workers include prospective civil servants, civil servants, members of the Indonesian National Armed Forces and so forth. Meanwhile, independent workers encompass employees of state/regionally-owned enterprises, village-owned enterprises, private companies and so forth. Furthermore, the new framework has now expanded the various obligations of employers to include the following: 1) Must ensure that worker data is kept updated; 2) Must maintain records of detailed savings payment reports; and so forth.
- The Regulation also sets out the various types of data and information that must be provided by employers or independent workers in order to ensure that BP Tapera is functioning optimally, including: 1) Individual data, which includes personal information and Tapera management principle data; 2) Employment data, including salary components; and 3) Accounts data or other types of financial data.

Monetary & Payment System

27. Regulation of the Bank Indonesia Board of Governors No. 11 of 2025 on the Eighth Amendment to Regulation of the Bank Indonesia Board of Governors No. 21/22/PADG/2019 on the Macroprudential Intermediation Ratio and the Macroprudential Liquidity Buffer for

Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units

Enforcement Date: 1 June 2025

Summary:

- The Eight Amendment has now reduced the Macroprudential Liquidity Buffer (*Penyangga Likuiditas Makroprudensial* – "**PLM**") for Conventional Commercial Banks (*Bank Umum Konvensional* – "**BUK**") from 5% to 4%, as well as the PLM sharia from 3.5% to 2.5% of the third-party funds of Sharia Commercial Banks (*Bank Umum Syariah* – "**BUS**"), as held in the rupiah currency. Banks may fulfill their PLM obligations through the use of eligible securities that are recognized in relation to Bank Indonesia ("**BI**") open-market operations.
- The Eight Amendment now allows BUK to include repo and liquidity management transactions that are conducted in line with BI sharia principles when attempting to meet their PLM and PLM Sharia requirements, subject to maximum limits of 4% and 2.5% respectively. It should also be noted that Bank Indonesia reserves the right to adjust these limits as it deems necessary.

28. Regulation of the Bank Indonesia Board of Governors No. 12 of 2025 on the Amendment to Regulation of the Bank Indonesia Board of Governors No. 7 of 2024 on the Implementing Regulation for the Offshore Funding Ratio

Enforcement Date: 1 June 2025

Summary:

- This Amendment has now officially set the countercyclical parameter at +5%. As a consequence, the upper limit of the Offshore Bank Funding Ratio (*Rasio Pendanaan Luar Negeri Bank*/RPLN), which was originally capped at 30%, has now been adjusted to 35% after the countercyclical buffer has been factored in.

29. Regulation of the Bank Indonesia Board of Governors No. 13 of 2025 on Organizers of Transaction Facilities

Enforcement Date: 10 June 2025

Summary:

- Organizers of transaction facilities ("**Organizers**") are required to fulfill several functions, including the monitoring of prices, exchange rates and

interest rates, as well as the publication of quotations and orders, and also the processing of transactions. Moreover, Organizers must now fulfill a number of general obligations, including: 1) Preparation and enforcement of provisions and a rulebook on facility operations, as decided in consultation with BI; 2) Provision of operational infrastructure within the scope of the relevant business activities; 3) Establishment of user criteria and/or requirements that are objective, risk-based and transparent. Furthermore, a number of additional obligations must be fulfilled, including connectivity with financial market infrastructure, consultations regarding the use of technological innovations within the financial sector, guarantees relating to reliability and oversight access for providers of infrastructure support services, as well as the prevention of any dual controlling shareholdings across different organizers.

- Licensing may only be granted if requirements relating to three main areas are fulfilled: 1) Institutional aspects; 2) Ability to engage in business activities; and 3) Other criteria, as determined by BI. Moreover, various specific licensing requirements will remain applicable, including the minimum amount of paid-up capital. For providers of newly introduced inter-market electronic trading platforms ("**ETP**"), a number of additional conditions must now also be met, including the securing of recommendations and the fulfillment of relevant licensing requirements in relation to financial instruments or transactions.
- Organizers are now required to allocate training and education funds amounting to approximately 3.5% of their current annual budgets to electronic trading platform providers and 1% of their current annual budgets to brokerage companies based on the previous year's gross salary expenditures. Annual reports must also be submitted that address the development of human resources. These two obligations will become effective in January 2026 and April 2027 respectively. In addition, the audit reporting obligation has been replaced with a requirement to submit reports on the implementation of risk management and governance, which are elements of system audits.

Natural Resources

30. Regulation of the Government No. 5 of 2025 on the Second Amendment to Regulation of the Government No. 4 of 2016 on the Importation of Livestock and/or Animal Products Originating From Countries or Zones in Countries of Importation Origin under Certain Conditions

Enforcement Date: 3 February 2025

Summary:

- Under the Second Amendment, the scope of imported livestock, as originally outlined under Regulation of the Government No. 4 of 2016 ("**Regulation 4/2016**"), has been specified to encompass only feeder cattle and/or buffalo and now includes dairy cattle and dairy buffalo.
- The Second Amendment stipulates that in order to serve Indonesia's national interest, the importation of livestock from countries that are not free from animal quarantine pests and diseases is now permitted in line with the application of maximum quarantine safety measures. However, said countries of origin must meet the following requirements: 1) Must have an official foot-and-mouth disease control program in place, as recognized by the World Organization for Animal Health (WOAH) and Indonesia's National Veterinary Authority; and 2) Must fulfill various technical animal health requirements and import procedures in accordance with applicable Laws.
- The Second Amendment also clarifies that business actors may now import livestock and/or animal products after being appointed by the head of the government institution responsible for food affairs. Moreover, State-Owned Enterprises (*Badan Usaha Milik Negara*/BUMN) and business actors that engage in any imports of livestock and/or animal products must fulfill certain requirements, which encompass technical animal health standards and quarantine requirements.

31. Decree of the Minister of Marine Affairs and Fisheries No. 31 of 2025 on the Class Stipulation of Selakau Fishing Port, Sambas Regency, West Kalimantan Province as a Selakau Fish Landing Base

Enforcement Date: 5 June 2025

Summary:

- This Decree officially stipulates the class of Selakau fishing port, which is located in Sambas Regency, West Kalimantan Province. This port has now been designated as a Selakau Fish Landing Base and will now be managed in line with relevant Laws and Regulations. In addition, this Decree mandates that the Head of the Selakau Fish Landing Base should submit monthly activity reports to the Governor of West Kalimantan, with copies also being sent to the Director-General of Capture Fisheries.

32. Decree of the Minister of Marine Affairs and Fisheries No. 32 of 2025 on the Fisheries Quota for Southern Bluefin Tuna (*Thunnus maccoyii*)

Enforcement Date: 5 June 2025

Summary:

- This Decree officially introduces a new southern bluefin tuna (*Thunnus maccoyii*) quota of 1,244,683 kg, which must be observed by fisheries. This new fisheries quota will be applicable for a one-year period during the 2025 fishing season.

33. Decree of the Director-General of Plantations No. 40/KPTS/KB.020/E/05/2025 on Technical Guidelines for the Development of Human Resources for Plantations under the Framework of the Plantation Fund Management Agency

Enforcement Date: 5 May 2025

Summary:

- In an effort to boost the overall quality of human resources within the oil-palm plantation sector, the Director-General of Plantations will now provide support in the form of counselling, education, training, guidance and facilitation. Counselling efforts encompass the development of self-supporting extension agents (*penyuluh swadaya*) and the designation of Oil-Palm Plantation Extension Work Areas (*Wilayah Kerja Penyuluhan Perkebunan Kelapa Sawit/*WKPPKS).
- Meanwhile, education will be offered through organized scholarship programs for vocational and academic higher education that specifically address various palm oil-related fields. These scholarships will be aimed at the following participants: 1) Smallholders; 2) Families of smallholders; 3) Employees/workers, administrators of smallholder institutions and administrators of smallholder associations operating within the oil-palm plantation sector who have been working/settled for periods of at least two years; 4) State civil servants working within the oil-palm sector; and 5) Extension workers working within oil-palm plantation areas who are accomplished within the sector and/or who are economically disadvantaged.
- In addition to education, the development of human resources also encompasses technical, managerial and entrepreneurial training. These programs feature modules and syllabi that are outlined under the Appendix to this Decree.

Non-Banking Financial Services

34. Circular of the Financial Services Authority No. 7/SEOJK.05/2025 on the Organization of Health Insurance Products

Enforcement Date: 1 January 2026

Summary:

- This framework outlines a detailed set of eligibility and operational standards for application by conventional and sharia insurance companies, as well as sharia business units that operate within conventional insurance companies (collectively referred to as "**Companies**") and that offer health insurance products ("**Products**"). While current insurance policies will remain effective until their relevant expiration dates, any Products with automatic renewal features must be brought into line with the updated framework by 31 December 2026.
- Companies must meet certain criteria that relate to human resources and information systems in order to be permitted to market health insurance products. Said criteria include the employment of medical professionals and certified staff, as well as the establishment of a Medical Advisory Board (*Dewan Penasihat Medis*/DPM) and the maintenance of robust, secure information systems capable of integrating data from healthcare providers and third parties. This database must support medical service analysis and utilization reviews, while all data should be retained for a period of at least 10 years.
- Generally speaking, all Products must have a waiting period of up to 30 calendar days. However, for Products that cover several medical conditions (i.e. critical, chronic or specific diseases), the waiting period can extend up to one year if clearly stated in the relevant policy.

35. Draft Regulation of Financial Services Authority on Representative Offices of Financing Institutions, Venture-Capital Companies and Other Types of Financial Services Institutions Located Aboard

Enforcement Date: -

Summary:

- Pursuant to this Draft Regulation, any financing institutions, venture-capital companies and financial services institutions (*Lembaga Pembiayaan, Perusahaan Modal Ventura dan Lembaga Jasa Keuangan* – "**PVL**") that are headquartered and domiciled overseas and that wish to open PVL Representative Offices (*Kantor Perwakilan* PVL - "**KPPVL**") in Indonesia must be able to demonstrate that they have posted good performances and have good reputations, as well as commit to making an active contribution to Indonesia. Moreover, any KPPVL that are opened must be located in an office building in the relevant provincial capital.
- Prior to establishing a KPPVL, a PVL must first secure an operational permit from the OJK by submitting an application, as well as a total of 14 supporting documents, including a business plan (covering a period of three years) and a corporate plan (covering a period of five years). Moreover, all KPPVL leadership candidates must participate in fit-and-proper tests organized by the OJK and must ultimately be approved by the OJK prior to assuming the roles of heads of the relevant KPPVL.

- The Draft Regulation also outlines a total of nine business activities that KPPVL are permitted to carry out. Said business activities include: 1) Provision of information to third parties regarding any terms and conditions for engaging in cooperation with headquarters or overseas branches; 2) Supervision of projects that are partially or wholly financed by headquarters or overseas branches; 3) Assisting Indonesian exporters in their efforts to gain access to overseas markets through the KPPVL's international network and vice versa; and so forth.
- It should also be noted that all KPPVL are required to submit monthly and quarterly reports to the OJK that specifically address their debtors in Indonesia who receive financing from headquarters or overseas branches. Moreover, KPPVL are also required to submit work plans for the upcoming year to the OJK, as well as workplan realization reports. Any failure to comply with these obligations may result in the imposition of administrative sanctions.

36. Draft Circular of the Financial Services Authority on the Reporting of the Implementation of Good Corporate Governance by Financing Institutions, Venture-Capital Companies, Microfinance Institutions and Other Types of Financial Services Institutions

Enforcement Date: -

Summary:

- In addition to adhering to the five mandated core principles of good corporate governance ("**GCG**"), as outlined under this Draft Circular, financing institutions, venture-capital companies, microfinance institutions and other types of financial services institutions (*Lembaga Pembiayaan, Perusahaan Modal Ventura, Lembaga Keuanagan Mikro, dan Lembaga Jasa Keuangan Lainnya* - "**PVML**") are required to draft and submit GCG implementation reports to the OJK at the end of each financial year. Said reports should contain the following information at the least: 1) Transparency of GCG implementation; 2) Self-assessment of GCG implementation; and 2) Action plan that addresses corrective actions and completion timelines, as well as any obstacles to completion that may be encountered.
- In terms of the aforementioned GCG implementation self-assessments, this Draft Circular mandates that said assessments should be drafted through the drawing up of working papers in line with the following phases: 1) Comparison between the fulfillment of each indicator and the actual conditions of the PVML, based on relevant data and information for each statement/question; 2) Based on the results of this analysis, a rating should subsequently be determined for each indicator (e.g. implementation of GCG principles); 3) Assessment of governance in terms of the structure, process and outcomes of governance implementation; and 4) Other GCG-related data and information.

- In terms of the submission of GCG implementation reports, the Draft Circular requires PVML to submit said reports by a deadline of 30 April of the following year. However, if a PVML applies the soundness assessment with the good governance factor, then the GCG implementation report will ultimately become incorporated into the relevant soundness assessment and should therefore be reported by a deadline of 15 February of the following year.

Pharmacies, Health Industry, and Foods & Drugs Standards

37. Regulation of the Minister of Industry No. 25 of 2025 on the Indonesian Halal Industry Awards

Enforcement Date: 27 May 2025

Summary:

- In comparison with the now-revoked framework of Regulation of the Minister of Industry No. 44 of 2022, which bore the same title as this Regulation ("**Regulation 44/2022**"), no significant changes have been made to the core organization of the Indonesia Halal Industry Awards ("**IHYA**"), which are organized on an annual basis. However, this new framework has revised the list of official IHYA categories, expanding it from eight categories to a total of 10. The newly incorporated categories encompass the following areas: 1) Best sector-specific industrial companies (e.g. food and beverage, cosmetics, textile products and so forth); 2) Businesses that contribute to the development and empowerment of halal industries; and 3) Individuals that contribute to the development and empowerment of halal industries.
- Newly featured under this Regulation, the abovementioned IHYA for sector-specific industrial companies comprises subcategories for both small- and medium-scale enterprises, as well as for large-scale industries. Moreover, in terms of the IHYA category for best financial services which provide support for the halal program, this new Regulation also affirms that this award comprises subcategories for banks and non-banking financial institutions.
- Although the assessment aspects for each of the IHYA categories often differ, as originally outlined under Regulation 44/2022, this Regulation states that all IHYA categories should, generally speaking, take into account six general aspects when assessing award nominees, including: 1) Technical aspects; 2) Managerial aspects; 3) Program implementation and evaluation; and so forth.

38. Regulation of the National Agency of Drug and Food Control No. 16 of 2025 on the Supervision of Pharmaceutical Supplies and Processed Foods Through Public Participation

Enforcement Date: 4 June 2025

Summary:

- This Regulation outlines the role of the public in terms of the monitoring of pharmaceutical supplies and processed food products ("**Products**") through the following two key activities: 1) Submission of information and reports that address any suspected misuse of products to the Head of the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan* – "**BPOM**"); and 2) Participation in efforts to raise public awareness, particularly through campaigns that promote the proper use of pharmaceutical and processed food products that comply with the applicable standards.
- The Head of BPOM will subsequently verify, evaluate and complete risk assessments regarding all such submissions. Based on the results of these processes, BPOM may ultimately take actions (i.e. issue public announcements, work to empower communities or initiate other necessary follow-ups). It is important to emphasize that information on any products suspected of not meeting the applicable standards can only be made public after BPOM has completed the verification and evaluation process.

39. Draft Regulation of the National Agency for Drug and Food Control on the Second Amendment to Regulation of the National Agency for Drug and Food Control No. 27 of 2022 on Supervision of the Importation of Food and Drugs into the Territory of Indonesia

Enforcement Date: -

Summary:

- Through this Draft Regulation, the requirement to secure approvals from the Head of the National Agency for Drug and Food Control (*Badan Pengawas Obat dan Makanan*/BPOM) in the form of Border Import Certificates (*Surat Keterangan Impor Border* – "**SKI Border**") or Post-Border SKI, which previously applied to imports of food and drug products into free-trade zones and free ports, special economic zones and bonded storage areas, as outlined under Regulation of BPOM No. 27 of 2022 on Supervision of the Importation of Drugs and Food into the Territory of Indonesia ("**Regulation 27/2022**"), now exempts all imports into such areas that are intended for the following purposes: 1) For non-commercial distribution within Indonesia; and 2) Importation into the Free-Trade Zone and Free Port of Sabang in order to meet the needs of residents living in the Sabang region.

40. Draft Decree of the Head of the National Agency of Drug and Food Control on Cosmetic Testing Parameters for Certificates of Analysis for Import Notification Applications

Enforcement Date: -

Summary:

- The Draft Decree sets out testing parameters for microbial and heavy metal contaminants in relation to 20 types of cosmetic products within the context of import notification applications. These parameters apply to both business operators during their fulfilment of cosmetics import requirements and the National Agency of Drug and Food Control during evaluations of import notification applications. In addition, the Draft Decree also affirms that in cases where different batches of the same cosmetic products are imported, the relevant certificate of analysis must not only set out the required testing parameters but also the relevant product's dosage form and organoleptic characteristics.

Profession

41. Regulation of the President No. 66 of 2025 on the State Protection of Prosecutors During the Carrying Out of the Duties and Functions of the Indonesian Prosecutor's Office

Enforcement Date: 21 May 2025

Summary:

- State protection has now been regulated to cover prosecutors and their family members, who include direct blood relations up and down the family line and sideways up to the third degree, as well as spouses and dependents. The protection provided by the Indonesian Police Force ("**Police**") now includes personal security, residential protection, the safeguarding of new residences or safe houses, property protection, the protection of identity confidentiality and various other forms of protection, as required and based on the situation in hand. In addition, the protection afforded by the Indonesian National Armed Forces (*Tentara Nasional Indonesia* – "**TNI**") is primarily focused on institutional protection, support and assistance, as offered by TNI personnel during official prosecutors' duties and various other strategic protection related to areas of national defense and sovereignty.
- In addition to the various forms of protection outlined above, cooperation with the State Intelligence Agency and the TNI Strategic Intelligence Agency will also be available to support prosecutors. This cooperation may involve

education and training programs, as well as exchanges of data and information. Funding for these protective measures will be sourced from the State Budget (*Anggaran Pendapatan Belanja Negara* – "**APBN**") and other lawful, non-binding sources of funding.

42. Regulation of the Minister of Law No. 20 of 2025 on Guidelines for the Stipulation of Fee Amounts for Receivers and Administrators

Enforcement Date: 27 May 2025

Summary:

- This framework introduces certain specific criteria and calculation methods that should be used to ensure that fees correspond to the complexity and outcome of each case, whether it ends with a settlement, asset liquidation or petition rejection.
- In terms of any bankruptcy petitions that are rejected at the cassation or judicial review levels, the receivers' fees will be calculated based on actual hours worked. Said receivers' fees have been capped at Rp. 4 million per hour, with judges taking factors such as work performed, case complexity, receiver's experience and hourly rates into consideration. In Debt Payment Obligation (*Penundaan Kewajiban Pembayaran Utang*/PKPU) cases, administrators' fees are typically agreed upon by debtors and administrators and are approved by judges, or otherwise set by judges under a prescribed maximum percentage of total debt limits.
- In cases where receivers or administrators are added or replaced, the relevant fees are determined during creditors' meetings, which will take the reasons for such changes into consideration. The results of such meetings should then be submitted to the relevant judges as the basis for the determination of final fees, while said fees will be charged to the relevant bankruptcy costs.

43. Regulation of the Minister of Law No. 21 of 2025 on the Blocking and Opening of Access to Limited-Liability Companies Through the Legal Entity Administration System

Enforcement Date: 10 June 2025

Summary:

- This Regulation stipulates various provisions on the blocking and opening of access to capital partnership companies and individual companies, which may be requested through the Ministry of Law's Legal Entity Administration System.
- For capital partnership companies specifically, access may be fully blocked or limited to changes in shareholding. Said requests must be supported by

the following documents: 1) Letter of application; 2) Decision or court order granting an access blocking request; 3) Proof of reporting of the relevant beneficial owners; and 4) Proof of payment of non-tax state revenue. Meanwhile, for individual companies, blocking requests should be submitted along with: 1) A registered civil lawsuit that addresses the relevant ownership or state administrative dispute; and/or 2) Registration documentation for an out-of-court dispute resolution settlement.

- Conversely, requests for the unblocking of access to capital partnership companies may be submitted along with the following documents: 1) Peace statement/agreement; 2) Determination of case revocation; and 3) A court decision that grants the request for unblocking. For individual companies, any such unblocking request must include either a copy of the relevant statement of establishment or the most recently amended statement, as recorded through the Legal Entity Administration System.

44. Regulation of the Minister of Law No. 22 of 2025 on Terms and Procedures for Appointments, Leaves of Absence, Transfers of Territory, Dismissals and Extensions of Terms of Office for Notaries

Enforcement Date: 12 June 2025

Summary:

- This Regulation outlines the various qualifications that individuals must comply with if they are intending to become notaries, which include: 1) Must be an Indonesian citizen; 2) Must demonstrate religious piety; 3) Must be physically and mentally healthy; 4) Must have completed an apprenticeship as a notary's employee lasting a minimum of 24 months; 5) Must not occupy any concurrent positions as a civil servant, state official, advocate or other position that notaries are prohibited from concurrently holding; 6) Must have never been sentenced to a term of imprisonment, as evidenced through supporting documents; and so forth.
- This new Regulation also features a set of guidelines that address the taking of official leave by notaries, which is available in line with the following conditions: 1) Must have served a minimum of two years in office; 2) Total accumulated leave must not exceed 12 years; and 3) A substitute notary must be appointed during the relevant period of leave.
- Furthermore, this Regulation also addresses the various admissible reasons for the termination or dismissal of notaries, which include: 1) Death; 2) Reaching the age of 65 years; 3) Reaching the age of 67 - 70 years (for notaries who have extended their terms of office); 4) Voluntary resignation; 5) Physical and/or mental incapacity that prevents the adequate performance of the duties of notary for more than three years; and 6) Occupying a position that is legally prohibited from being simultaneously held by a notary.

45. Regulation of the Minister of Law No. 24 of 2025 on the Establishment, Guidance and Supervision of Notary Organizations

Enforcement Date: 16 June 2025

Summary:

- Through the introduction of this new Regulation, the Minister of Law ("**Minister**") has now affirmed that the Indonesian Notary Association (*Ikatan Notaris Indonesia* – "**INI**") has now been officially recognized as the country's forum for notaries. In this regard, the INI will be required to manage and organize itself professionally, including: 1) Fulfilment of its duties in accordance with applicable Laws and Regulations, articles of association and bylaws; 2) Preparation of performance reports on an annual basis at the least; 3) Submission of audited annual financial statements; and 4) Ensuring that documents and/or information are made available for supervisory purposes.
- In order to enhance the overall professionalism of the country's notaries and improve the delivery of public services, INI may form partnerships with other parties, provided that they first secure prior approvals from the Minister. In addition, INI may also be subject to the imposition of administrative sanctions in the form of first written reprimands or suspensions of the organization's management in response to any failure to comply with the various obligations set out under this Regulation.

Tax & Non-Tax Charges

46. Regulation of the Minister of Finance No. 34 of 2025 on the Amendment to Regulation of the Minister of Finance No. 203/PMK.04/2017 on Provisions on the Import and Export of Goods Carried by Passengers and Transport Crews

Enforcement Date: 6 June 2025

Summary:

- In comparison with the original framework of Regulation of the Minister of Finance No. 203/PMK.04/2017 ("**Regulation 203/2017**"), this Amendment now clarifies the types of parties who may submit oral declarations that address imported goods that are carried by passengers or transport crews. Said parties now include: 1) Passengers over 60 years of age; 2) Passengers with disabilities; and 3) Regular Hajj pilgrims.
- The Amendment also introduces a number of import-duty exemptions for goods with customs values of up to FOB US$ 2,500 per person per arrival, as carried by officially registered regular or special Hajj pilgrims. Moreover,

these exemptions also apply to competition prizes or awards that take the form of medals, trophies, plaques, badges and/or other designated items, provided that certain conditions are met.

- In comparison with the original framework of Regulation 203/2017, the Amendment also stipulates that any personal goods that are carried by passengers with customs values that exceed FOB US$ 500 will not only be subject to a 10% import-duty and customs valuation but will also be subject to value-added tax and/or sales tax on luxury goods while being excluded from income-tax collection. This policy also applies to personal goods that are carried by special Hajj pilgrims with customs values that exceed FOB US$ 2,500. Moreover, the Regulation also explicitly exempts imported personal goods from anti-dumping and safeguard duties such as countervailing duties and/or retaliatory duties.

47. Regulation of the Director-General of Tax No. PER-4/PJ/2025 on the Amendment to Regulation of the Director-General of Tax No. PER-25/PJ/2020 on the Form and Content of Payable Tax Notification Letters, Calculation Notes, Land-and-Building-Tax Assessment Letters, Land-and-Building-Tax Overpayment Decision Letters, Notification Letters and Land-and-Building-Tax Bills

Enforcement Date: 29 April 2025

Summary:

- This Regulation has now officially expanded the list of documents that specifically relate to Land-and-Building Tax (*Pajak Bumi dan Bangunan* – "**PBB**") from 11 to 15 documents by newly incorporating documents that specifically address the following matters: 1) Nil-Tax Assessment Letters (*Surat Ketetapan Pajak Nihil* – "**SKPN**"); and 2) Overpaid-Tax Assessment Letters (*Surat Ketetapan Pajak Lebih Bayar* – "**SKPLB**"). These documents, as well as their corresponding calculation notes, should be drafted in line with the format that is outlined comprehensively under the Appendices to this Regulation.

48. Regulation of the Director-General of Tax No. PER-5/PJ/2025 on Tax Application Service Providers

Enforcement Date: 2 May 2025

Summary:

- The enforcement of this Regulation has resulted in the simultaneous repeal and replacement of Regulation of the Director-General of Taxes ("**Director-General**") No. PER-11/PJ/2019 on Tax Application Service Providers, as amended by Regulation of the Director-General No. PER-

10/PJ/2020 (collectively referred to as "**Regulation 11/2019**"). Accordingly, any Director-General decisions regarding the appointment of tax application service providers ("**Providers**") that were made prior to the enforcement of this Regulation will remain valid in terms of the exercising of tax rights and the fulfillment of tax obligations up until the December 2024 tax period, the partial tax year that ends December 2024 and/or the end of the 2024 tax year.

- This Regulation no longer addresses the issuance of official Taxpayer Identification Numbers to individual employee taxpayers, as was previously the case under the framework of Regulation 11/2019; however, other tax application services remain similar. In addition, this Regulation further clarifies the various types of documents that must be submitted with application letters for the appointment and/or reappointment of Providers, which include: 1) Company profile; 2) Copy of the deed of establishment of the relevant legal or business entity; 3) Ownership data of the relevant legal or business entity; and so on.
- The Regulation also details the various documents that must be submitted whenever changes are made to the relevant management structures and/or shareholding composition, including: 1) The basis or reason for the structural change; 2) A copy of a related general meeting of shareholders resolution; 3) A summary of the current composition of the management and shareholders and/or the composition of the relevant board of directors and board of commissioners; and so forth. It is also important to note that the Regulation also sets out various mandatory formats and/or templates that must be used by Providers, as outlined under the Appendices to the Regulation.

49. Regulation of the Director-General of Tax No. PER-6/PJ/2025 on Preliminary Refunds of Tax Overpayments for Taxpayers That Meet Certain Criteria and Certain Requirements, and Low-Risk Taxable Entrepreneurs, as Well as Special Purpose Companies and Collective Investment Contracts Categorized as Low-Risk Taxable Entrepreneurs

Enforcement Date: 21 May 2025

Summary:

- The qualifying criteria that must be met by taxable entrepreneurs (*Pengusaha Kena Pajak* – "**PKP**") in order for them to be classified as low risk have been expanded from eight to nine. In this regard, in addition to the existing eight criteria already recognized under the previous framework, PKP who submit value-added tax (*Pajak Pertambahan Nilai* – "**PPN**") periodic tax returns (*Surat Pemberitahuan* – "**SPT**") for overpayment restitution of up to Rp. 5 billion are now also eligible to enjoy low-risk status.
- PKP that meet this new criterion are no longer required to apply for, or secure, a formal low-risk determination decision from the Director-General of Tax ("**Director-General**"). Furthermore, in terms of other low-risk PKP

criteria that do require determination, the Director-General must issue a decision within 15 working days of the submission of an application for any such determination to be considered complete.

- The newly revised framework has also updated key provisions on the processing of preliminary tax overpayment refunds ("**Preliminary Refunds**"). Specifically, relevant taxpayers now have up to three years after the end of the relevant tax period, partial tax year or tax year to resubmit refund requests for any tax credits that were previously unaccounted for. Additionally, decisions on SPT corrections now must be issued within one month of any complete SPT corrections application being received.

50. Regulation of the Director-General of Tax No. PER-7/PJ/2025 on Guidelines for the Implementation of Taxpayer Identification Number Administration, Taxable Entrepreneurs, Land-and-Building Tax Objects and Details of Types, Documents and Channels for the Implementation of Tax Rights and the Fulfillment of Tax Obligations

Enforcement Date: 21 May 2025

Summary:

- In addition to addressing official Taxpayer Identification Numbers (*Nomor Pokok Wajib Pajak* – "**NPWP**"), the use of which is mandatory for all taxpayers who meet the applicable subjective and objective taxpayer requirements, this Regulation also authorizes the Director-General of Tax ("**Director-General**") to issue taxation identities in the form of NPWP to relevant parties who have not yet fulfilled the subjective and objective taxpayer requirements but who require to utilize relevant taxation services. Said taxation identities will take a similar form to regular NPWP (i.e. citizenship identification numbers and 16-digit format numbers), while the holders of this new type of taxation identity will be eligible to utilize 10 types of tax-related services.
- Pursuant to this Regulation, taxpayers should register electronically through the following platforms: 1) The taxpayer portal (i.e. the Core Tax administration system); 2) Websites or other applications that have been integrated into the administration system of the Directorate-General of Tax ("**Directorate-General**"); and/or 3) Contract centers at the Directorate-General. In terms of the websites or other applications listed in point (2) above, this Regulation affirms that said platforms include: 1) The Legal Entity Administration System (*Sistem Administrasi Badan Hukum*/SABH) and the Business Entity Administration System (*Sistem Administrasi Badan Usaha*/SABU) of the Directorate-General of General Legal Administration at the Ministry of Law; 2) The Online Single Submission (OSS) system; and 3) Other platforms, as determined by the Directorate-General.
- Upon the enforcement of this Regulation, a total of seven regulatory frameworks of the Director-General of Tax were officially repealed and replaced. Nevertheless, several sets of guidelines, as originally featured under certain revoked frameworks, will remain applicable, provided that the

provisions contained therein do not conflict with this new Regulation. Said sets of applicable guidelines feature under the following frameworks: 1) Regulation of the Director-General No. PER-08/PJ/2019; 2) Regulation of the Director-General No. PER-04/PJ/2020; and 3) Regulation of the Director-General No. PER-02/PJ/2021, as amended by Regulation of the Director General No. PER-13/PJ/2021.

51. Regulation of the Director-General of Tax No. PER-8/PJ/2025 on the Provision of Certain Tax-Administration Services Within the Context of the Implementation of the Core-Tax Administration System

Enforcement Date: 21 May 2025

Summary:

- At its core, this Regulation outlines a total of 13 types of tax-administration services that can be provided. These services broadly break down as follows: 1) Fiscal notification letters; 2) Amendments to booking methods and/or book years; 3) Issuance and cancellation of permits relating to the organization of booking and recordings that utilize the English language or the United States dollar currencies; 4) Issuance of use-of-book values for transfers and acquisitions of assets; and 5) The administration of reappraisals of the fixed assets of companies for tax purposes.
- Upon entering into force, a total of 27 regulatory frameworks of the Director-General of Tax were officially repealed and replaced. However, any service products that specifically relate to tax-administration services, as outlined above, and that were issued between 1 January 2025 and the date of enforcement of this Regulation, will remain valid and applicable.

52. Regulation of the Director-General of Tax No. PER-9/PJ/2025 on the Deactivation of Access to Tax Invoice Drafting in Order to Handle Unlawful Tax Invoice Issuance and/or Utilization Activities

Enforcement Date: 22 May 2025

Summary:

- This new Regulation maintains the core process for the deactivation of access (suspension) to the drafting of tax invoices by taxpayers that are indicated as being issuers or users of unlawful tax invoices, as originally outlined under Regulation of the Director-General of Tax ("**Director-General**") No. PER-19/PJ/2017, as amended by Regulation of the Director-General No. PER-16/PJ/2018 (collectively referred to as "**Regulation 19/2017**"). This new Regulation also affirms that any such access deactivation may be based on the development and analysis of various

criteria (e.g. location and reasonableness of relevant taxpayers' business locations and conformity of taxpayers' business activities).

- In terms of the post-deactivation clarification process, as engaged in by respective taxpayers who are subject to access deactivations, this new Regulation has introduced no significant changes to this process in comparison with the procedures originally outlined under the framework of Regulation 19/2017. However, this Regulation now authorizes the Heads of relevant Regional Offices of the Directorate-General of Tax to not only gather information from relevant parties in relation to their submitted clarifications but also undertake examinations of onsite locations.
- Although the enforcement of this Regulation has resulted in the repeal and replacement of Regulation 19/2017, it should be noted that any taxpayers that have already been designated with a suspended status in accordance with the now-revoked framework of Regulation 19/2017 will continue to be processed in line with the provisions set out under Regulation 19/2017.

53. Regulation of the Director-General of Tax No. PER-10/PJ/2025 on the Implementation of Information Exchanges Based on International Agreements

Enforcement Date: 22 May 2025

Summary:

- Pursuant to this Regulation, the Director-General of Tax ("**Director-General**") is authorized to secure or gain access to information relating to taxation enforcement. Broadly speaking, said information is to be sourced from relevant parties (e.g. governmental agencies, financial institutions and so forth). Any information that is ultimately secured by the Director-General is permitted to be traded with the authorities of partner countries or jurisdictions in line with the implementation of tax-related international treaties.
- It should be noted that the above-mentioned tax-related international treaties are those that permit a wide array of tax-related information to be exchanged, including: 1) Agreements on the avoidance of double taxation (*Persetujuan Penghindaran Pajak Berganda*/P3B); 2) Tax information exchange agreements; 3) Conventions on mutual administrative assistance regarding tax matters; 4) Multilateral or bilateral competent authority agreements; 5) Intergovernmental agreements; or 6) Other bilateral or multilateral agreements.
- The above-described information exchanges may be carried out on a reciprocal basis in several ways (i.e. based on submitted requests, spontaneously or automatically). The Director-General is now authorized to implement a wide array of measures in relation to said information exchanges (e.g. meetings of competent authorities, tax examinations that are undertaken in foreign countries and/or simultaneous tax examinations). Moreover, this Regulation affirms that the types of information that are permitted to be exchanged break down as follows: 1) Identity and ownership

information (e.g. beneficial owners); 2) Accounting information; 3) Banking information; 4) Taxation information; and/or 5) Other types of information.
- Upon the enforcement of this Regulation, a total of four regulatory frameworks of the Director-General were officially repealed and replaced. These now-revoked frameworks break down as follows: 1) Regulation of the Director-General No. PER-67/PJ/2009; 2) Regulation of the Director-General No. PER-28/PJ/2017; 3) Regulation of the Director-General No. PER-24/PJ/2018; and 4) Regulation of the Director-General No. PER-02/PJ/2022.

54. Regulation of the Director-General of Tax No. PER-11/PJ/2025 on Provisions on the Reporting of Income Tax, Value-Added Tax, Luxury-Goods Sales Tax and Stamp Duty Within the Context of the Implementation of the Core-Tax Administration System

Enforcement Date: 22 May 2025

Summary:

- At its core, this Regulation addresses a wide scope of updated matters relating to income tax (*Pajak Penghasilan* – "**PPh**"), value-added tax (*Pajak Pertambahan Nilai* – "**PPN**") and luxury-goods sales tax (*Pajak Penjualan atas Barang Mewah* – "**PPnBM**"), including: 1) Formats, content, filling out procedures and submissions of PPh and PPN tax returns; 2) Formats, content, filling out procedures and submissions of stamp-duty tax returns; and 3) Information and/or documents that must be attached to tax returns, as well as the formats and means of submission of said information and/or documents.
- Upon the enforcement of this Regulation, 25 regulatory frameworks of the Director-General of Tax were officially repealed and replaced. However, the issuance of tax invoices, as addressed under the following two now-revoked frameworks, will remain applicable on a limited basis: 1) Regulation of the Director-General of Tax No. PER-03/PJ/2022; and 2) Regulation of the Director-General of Tax No. PER-11/PJ/2022.

55. Regulation of the Director-General of Tax No. PER-12/PJ/2025 on Certain Limiting Criteria for Other Parties and the Appointment of Other Parties, and the Collection, Deposit and Reporting of Value Added Tax on the Utilization of Intangible Taxable Goods and/or Taxable Services from Outside Customs Areas Within Customs Areas Through Trading Through Electronic Systems for the Implementation of the Core-Tax Administration System

Enforcement Date: 22 May 2025

Summary:

- At its core, the threshold for the collection of value-added tax (*Pajak Pertambahan Nilai* – "**PPN**") on Trading Activities via Electronic System (*Perdagangan Melalui Sistem Elektronik* – "**PMSE**") businesses that are stipulated as other third parties facilitating transactions ("**Other Parties**"), as set by the Director-General of Tax (i.e. goods and/or services transactions valued at over Rp. 600 million and/or if total traffic in Indonesia exceeds access by 12,000 users within a one-month period), as originally featured under Regulation of the Director-General of Taxes ("**Director-General**") No. PER-12/PJ/2020 ("**Regulation 12/2020**"), has been retained.
- In terms of the reporting of PPN collection, this Regulation now mandates that PPN collection must be reported as a part of the periodic PPN tax returns (*Surat Pemberitahuan* – "**SPT**") of respective Other Parties. Consequently, PPN collection reports must be submitted by a deadline of the end of the month following the elapse of the relevant periodic PPN SPT. Previously, Regulation 12/2020 stated that the reporting of the aforementioned PPN collection was to be implemented on a quarterly basis.
- In terms of PPN deposits, Regulation 12/2020 previously stated that said deposits could be completed in the following currencies: 1) Rupiah (at exchange rates that were determined by the Minister of Finance at the time of deposits); 2) US dollars; or 3) Other currencies, as stipulated by the Director-General. However, this Regulation no longer features the option of other currencies being used for PPN deposits, as outlined in point (3) above.
- Finally, it should be noted that upon the enforcement of this Regulation, Regulation 12/2020 will be officially repealed and replaced.

56. Decree of the Director-General of Customs and Excise No. KEP-97/BC/2025 on the Use of Electronic Seals for the Transportation of Imported and/or Exported Goods

Enforcement Date: 23 May 2025

Summary:

- The Director-General of Customs and Excise now requires the use of Electronic Seals ("**E-Seals**") in order to enhance monitoring during the transportation of all imported and/or exported goods. E-Seals must be provided by Customs Service Users (e.g. importers, exporters and transporters) and/or official E-Seal providers who are appointed by Customs Service Users based on mutual agreement (collectively referred to as "**Parties**").
- In order to be deemed eligible to use E-Seals, the aforementioned Parties must meet a specific set of requirements, which include the provision of certified E-Seals and/or compliance with customs-and-excise business process standards. Additionally, Parties must submit applications to the Director of Customs and Excise Information in order to secure approvals for the integration of their E-Seal systems into the Customs Service Computer System (*Sistem Komputer Pelayanan*/SKP).

- E-Seals must be affixed to goods prior to transportation from their points of origin and must be removed upon arrival at their destinations. Goods that are secured with E-Seals will not require any additional sealing or security measures, except in certain cases, such as when disruptions to the electronic network prevent the use of E-Seals.

Technology, Media, and Telecommunication

57. Regulation of the Minister of Communication and Digital Affairs No. 13 of 2025 on the Utilization of the Radiofrequency Spectrum in the 1.4 GHz Radiofrequency Band

Enforcement Date: 23 May 2025

Summary:

- At its core, the 1.4 GHz radiofrequency band of 1427 -1518 MHz is now set to be utilized via Time Division Duplexing (TDD) mode in order to provide Broadband Wireless Access ("**BWA**") services through packet-switched local fixed network operations and the use of international mobile telecommunications standards.
- This Regulation affirms that the right to utilize the abovementioned 1.4 GHz radiofrequency band will be granted in the form of Radiofrequency Band Permits (*Izin Pita Frekuensi Radio* - "**IPFR**") to packet-switched-based, local fixed-network operators with regional service areas.
- Although this Regulation allows relevant IPFR holders to utilize any technologies that comply with International Mobile Telecommunications standards, this new framework outlines several obligations that must be fulfilled by permit holders, including: 1) Must utilize telecommunications equipment and/or devices for which relevant certification has been secured; and 2) Must settle any radiofrequency spectrum utilization rights fees for IPFR.
- If efforts to mitigate adverse interference are required, then the Director-General will coordinate with IPFR holders. The subsequent results of any such technical coordination will then have to be complied with by all IPFR holders. In this regard, any non-compliant IPFR holders will be subject to the imposition of administrative sanctions in the form of written reprimands, suspensions of radiofrequency spectrum transmissions and/or revocation of IPFR.
- Upon entering into force, Regulation of the Minister of Communications and Informatics No. 07/PER/M.KOMINFO/01/2009 on the Arrangement of Radiofrequency Bands for the Purpose of Wireless Broadband Services was officially repealed and replaced.

58. Regulation of the Minister of Communication and Digital Affairs No. 14 of 2025 on Special Telecommunications Systems for Private Use

Enforcement Date: 4 June 2025

Summary:

- Under this new framework, the Minister of Communication and Digital Affairs has now specifically addressed the organization of special telecommunications systems for private use. Said systems may be organized for use by individuals, government agencies, special services or legal entities. The provision of special telecommunications systems for private use by legal entities is permitted in the event that official local telecommunications network providers and/or telecommunications service providers are not capable of meeting the relevant requirements or are out of range of the locations of the relevant activities and/or if the activities in question require separate and independent telecommunications networks. In such cases, a special license must be applied for and secured through the Online Single Submission (OSS) system.
- Furthermore, this new Regulation specifies that the transmission media that may be utilized by such special telecommunications systems include traditional cables, optical cables, radio links and/or other types of electromagnetic systems.

59. Decree of the Minister of Communication and Digital Affairs No. 204 of 2025 on Technical Standards for Telecommunications Equipment and/or Broadband Wireless Access Telecommunications Devices Based on International Mobile Telecommunications-2020 Technology Standards

Enforcement Date: 23 May 2025

Summary:

- This Decree stipulates technical standards for telecommunications equipment and/or devices for subscriber station broadband wireless access based on International Mobile Telecommunications-2020 ("**IMT-2000**") standards. The new technical standards break down as follows: 1) Power supply requirements; 2) Electrical safety requirements; 3) Electromagnetic compatibility requirements; 4) Non-ionizing radiation requirements; 5) Radiofrequency requirements; 6) Antenna requirements; and 7) Technical operational provisions.
- The Decree also stipulates standards for base-station broadband wireless access based on IMT-2000 standard technology. These standards break down as follows: 1) Power supply requirements; 2) Electrical safety

requirements; 3) Electromagnetic compatibility requirements; and 4) Radiofrequency requirements.
- In addition to the abovementioned technical standards, the Decree also stipulates various testing methods for the aforementioned telecommunications equipment and/or devices. Further information on details of the applicable technical standards and testing methods can be found under the Appendix to the Decree.

Trade

60. Regulation of the Government No. 25 of 2025 on the Amendment to Regulation of the Government No. 41 of 2021 on the Organization of Free-Trade Zones and Free Ports

Enforcement Date: 3 June 2025

Summary:

- In addition to addressing the organizational structures of and remuneration relating to Free-Trade Zone and Free Port (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas* – "**KPBPB**") development authorities, the Amendment introduces a new distinction between the authority of the Batam KPBPB Development Authority (*Badan Pengusahaan KPBPB Batam* – "**BP Batam**") and other KPBPB development authorities ("**Other Development Authorities**"). In essence, BP Batam is now authorized to issue ground requirements (e.g. forest area approvals), business permits and Business Licenses to Support Business Activities (*Perizinan Berusaha untuk Menunjang Kegiatan Usaha* – "**PB-UMKU**") to entrepreneurs who establish and operate businesses within Batam KPBPB areas.
- While maintaining the original 15 sectors for which Other Development Authorities are authorized to issue relevant business permits (e.g. marine and fisheries, agriculture, industry and so forth), the Amendment now specifies eight specific sectors for which BP Batam is authorized for such issuance. Nevertheless, the Amendment has now reaffirmed that Other Development Authorities continue to be authorized to issue other types of business permits, as required by businesses.
- In addition to the revised business licensing sectors outlined above, the Amendment now sets out the applicable ground requirements (e.g. approvals for marine area utilization activities, forestry area approvals and environmental approvals), as well as the 16 authorized sectors for the issuance of business permits and PB-UMKU by BP Batam.

61. Regulation of the Minister of Trade No. 15 of 2025 on the Standardization of the Trade Sector

Enforcement Date: 17 June 2025

Summary:

- In essence, this Regulation outlines a total of 10 forms of standardization for goods, services and manpower within the trade sector. The various standardized trade-related matters that are specifically addressed under this Regulation include: 1) The formulation, stipulation and/or review of standards within the trade sector; 2) The application and enforcement of standards within the trade sector; 3) Conformity Assessment Agencies (*Lembaga Penilaian Kesesuaian* – "**LPK**") for standardization within the trade sector; 4) Conformity assessments of trade-sector standardization; and 5) The trade-sector standardization information system.
- In terms of conformity assessments of goods, services and/or manpower, as listed in point (4) above, this Regulation affirms that said assessments (which comprise testing, inspections and/or certification) should be implemented by LPK in line with relevant Indonesian National Standards (*Standar Nasional Indonesia* – "**SNI**"), mandatory workforce competencies and/or technical requirements.
- It is important to note that this Regulation prohibits any trading of goods and/or services that do not meet relevant SNI and/or technical requirements. Moreover, relevant businesses should ensure that they know the identities of all traded goods and/or services.
- Any businesses that violate any of the above-outlined obligations will be subject to the imposition of administrative sanctions that range from written reprimands to recalls of goods from distribution, temporary suspensions of business activities and/or revocations of issued business permits.

62. Decree of the Minister of Trade No. 1515 of 2025 on Export Benchmark Prices for Mining Products Subject to Export Duty

Enforcement Date: 13 June 2025 - 30 June 2025

Summary:

- This Decree outlines a new set of applicable Export Benchmark Prices (*Harga Patokan Ekspor*/HPE) for a total of 209 types of copper concentrate products, as comprehensively listed under the Appendix to Decree 1515/2025. Prices for said products have been set in the following range: US$/WE 1,504.60 to US$/WE 7,522.73.

63. Circular of the Commodity Futures Trading Regulatory Agency No. 208/BAPPEBTI/SE/06/2025 on Service Adjustments for Commodity

Futures Trading, the Warehouse Receipt System and Commodity Auction Markets due to the Relocation of the Bappebti Data Center

Enforcement Date: 13 June 2025

Summary:

- In order to ensure operational continuity, effectiveness and efficiency, as well as improved security concerning information technology systems, the Commodity Futures Trading Regulatory Agency (*Badan Pengawas Perdagangan Berjangka Komoditi* – "**Bappebti**") has decided to relocate its data center from Jalan Kramat Raya No. 172 to Jalan M.I. Ridwan Rais No. 5. This relocation will be completed between 13 June 2025 and 17 June 2025. During this temporary relocation period, public services will still be available through Short Message Service text messages, official emails and/or in-person service.
- Moreover, during this relocation process, Bappebti's various provided systems will be inaccessible. As such, licenses will be processed manually during this period, while all mandatory reports and complaints must be submitted via Bappebti's official email address. However, despite the temporary changes to the available submission methods, the timeline for reporting obligations and the substance of reports will remain unchanged. After completion of the relocation process, Bappebti may subsequently decide to validate or adjust the various services that it has been providing to date in order to ensure that outcomes are in compliance with applicable Regulations.

64. Circular of the Commodity Futures Trading Regulatory Agency No. 209/BAPPBETI/SE/06/2025 on the Implementation of Electronic Mediation (E-Mediation) at Futures Exchanges in Order to Settle Customer Disputes Relating to Commodity Futures Trading

Enforcement Date: 17 June 2025

Summary:

- Electronic Mediation ("**E-Mediation**") may be initiated within the commodity futures trading sector between futures brokers and their customers (collectively referred to as the "**Disputing Parties**") and involves the use of information and remote audiovisual communications technologies that allow said Disputing Parties to see and hear each other while they interact directly. In order to be deemed eligible for E-Mediation, Disputing Parties must meet one of the following conditions: 1) Must reach a mutual agreement to engage in E-Mediation; 2) The customer must be unable to travel for medical reasons; or 3) The customer must reside in a remote, frontier or outlying (*tertinggal, terdepan dan terluar*/3T) region.
- Prior to engaging in any process of E-Mediation, a futures exchange will be required to appoint a mediator who must possess certain specific

qualifications. Moreover, said futures exchange must first establish a Standard Operating Procedure (SOP) that outlines the relevant E-Mediation preparation and implementation stages, as well as related documentation procedures, and reporting and administrative processes. Meanwhile, the appointed mediator must meet certain professional requirements, including holding a valid mediator's certificate, not having any conflicts of interest, possessing relevant dispute resolution experience and demonstrating adequate knowledge of the various applicable Laws and Regulations that govern commodity futures trading.

- During the E-Mediation process, the Disputing Parties must attend the session either in person or through a legal representative. Attendance requirements include ensuring that video cameras remain active, participating in good faith and rescheduling in cases where absences with valid reasons prove unavoidable. If a settlement is ultimately reached, then it must be documented in a written agreement and signed electronically before it will become final and binding.

65. Decree of the Director-General of Customs and Excise No. KEP-97/BC/2025 on the Implementation of E-Seals for the Transportation of Imported and/or Exported Goods

Enforcement Date: 23 May 2025

Summary:

- The Director-General of Customs and Excise now requires the use of Electronic Seals ("**E-Seals**") in order to enhance monitoring during the transportation of imported and/or exported goods. E-Seals must be provided by Customs Service Users (e.g. importers, exporters and transporters) and/or official E-Seal providers who are appointed by Customs Service Users based on mutual agreement (collectively referred to as "**Parties**").
- In order to be deemed eligible to use E-Seals, the aforementioned Parties must meet a specific set of requirements, which include the provision of certified E-Seals and/or compliance with customs-and-excise business process standards. Additionally, Parties must submit applications to the Director of Customs and Excise Information in order to secure approvals for the integration of their E-Seal systems into the Customs Service Computer System (*Sistem Komputer Pelayanan*/SKP).
- E-Seals must be affixed to goods prior to transportation from their points of origin and must be removed upon arrival at their destinations. Goods that are secured with E-Seals will not require any additional sealing or security measures, except in certain cases, such as when disruptions to the electronic network prevents the use of E-Seals.

Transportation and Logistic Services

66. Directive of the Minister of Transportation No. IM 3 of 2025 on the Organization of Shipping Safety and Security Duties and Functions for River, Lake and Crossing Transportation

Enforcement Date: 28 April 2025

Summary:

- This Directive stipulates various provisions through which the Director-General of Sea Transportation will carry out various duties and functions that relate to the shipping safety and security of river, lake and ferry transportation, which include the following: 1) All ship certificates, ship letters and ship documents must be issued by the Directorate-General of Sea Transportation commencing 30 April 2025; 2) All ship certificates, ship letters and ship documents that have already been issued by the Directorate-General of Land Transportation will remain valid until their relevance expiration dates; 3) The issuance of Sailing Approval Letters (*Surat Persetujuan Berlayar* - "**SPB**") by the Directorate-General of Sea Transportation will become effective from 30 April 2025 for seaports and ports that serve ferry transportation and 31 December 2025 for river and lake ports; and 4) The implementation of shipping telecommunications services by the Directorate-General of Sea Transportation will be effective from 30 April 2025.
- Upon the enforcement of this new Directive, Directive of the Minister of Transportation No. IM 9 of 2024 on Transfers of Tasks and Functions Within the Field of Implementation for River, Lake and Crossing Transportation was officially repealed and replaced.

67. Decree of the Director-General of Sea Transportation No. KP-DJPL 331 of 2025 on the Stipulation of Work Areas and Work Posts for the Implementation of Shipping Safety and Security Duties and Functions for River, Lake and Crossing Transportation

Enforcement Date: 20 May 2025

Summary:

- This Decree officially stipulates a total of 22 work areas and work posts that specifically relate to the organization of shipping safety and security duties and functions for river, lake and crossing transportation. Overall, these work areas and work posts comprise Class I - Class IV seaports and

harbormasters, including main seaports and harbormasters, as well as the Batam Special Seaport and harbormaster.

68. Draft Regulation of the Government on the Amendment to Regulation of the Government No. 31 of 2021 on the Organization of the Shipping Sector

Enforcement Date: -

Summary:

- Business licenses may soon be granted to business entities that are specifically established to run service businesses that relate to water transportation. Furthermore, cooperation with foreign shipping companies, foreign legal entities and foreign nationals will soon be permitted in the form of joint ventures, with the majority of shares being held by service business entities or through foreign investment companies. In this regard, several factors must be considered in terms of any such cooperation (e.g. business location, labor arrangements, beneficial ownership and so forth).
- The terms “port authority” and “port operator unit” will also be standardized to “port organizer” (“**Organizer**”) without altering any of the relevant assigned duties or responsibilities. Accordingly, the authority to engage in port operations and grant business licenses, which was previously held by central government agencies, will be transferred to Organizers operating at both noncommercial and commercial ports. Moreover, in addition to port business entities and terminal operators, Organizers will also be allowed to provide and or deliver port services that are not yet offered by any existing entities.
- Vessel registrations may soon encompass not only the issuance of permanent measurement certificates but also temporary measurement certificates. Moreover, the scope of vessel registrations is set to be expanded to include: 1) Ownership transfers; 2) Continuous synopsis records; 3) Deletion of ownership; and 4) Recording and documentation. Furthermore, registered vessels may also be used as collateral through vessel mortgages, which are enforceable through *grosse* mortgage deeds with executorial power. The identities of Indonesian vessels should be demonstrated through the hoisting of the national flag and prominent displays of vessel names and registration locations, as well as the relevant radio station call signs.

Miscellaneous

69. Regulation of the Government No. 24 of 2025 on the Special Handling of and Granting of Rewards to Witness-Perpetrators

Enforcement Date: 8 May 2025

Summary:

- Regulation 24/2025 has introduced a new framework for the special handling of and granting of rewards to Witness-Perpetrators (i.e. suspects, defendants or convicts who help uncover crimes) as part of the government's implementation of Law 13/2006 on the Protection of Witnesses and Victims. In this regard, special handling (e.g. separate detention and non-confrontational testimonies) can be requested by a Witness-Perpetrator or granted by the authorities if safety is believed to be at risk.
- All requests for special handling will be processed through a two-stage assessment mechanism. Firstly, an administrative review must be completed within five business days, followed by a substantive review that should be completed within 30 business days (extendable once). All applications must meet both substantive criteria (e.g. must not be a main perpetrator) and administrative requirements (e.g. identity documents, cooperation statements).
- Regulation 24/2025 also sets out a reward mechanism for cooperating offenders based on LPSK recommendations. In this regard, defendants may be able to enjoy sentence reductions, while convicts may enjoy conditional releases, additional remissions or other types of prisoners' rights. These rewards will only be granted after special handling has been provided and testimony has been delivered in court.

70. Regulation of the President No. 63 of 2025 on the Ratification of the Protocol to Amend the Comprehensive Economic Partnership Agreement Between the Government of the Republic of Indonesia and the Government of the Republic of Chile for the Incorporation of Provisions on Trade in Services

Enforcement Date: 8 May 2025

Summary:

- This Regulation ratifies the Protocol to Amend the Comprehensive Economic Partnership Agreement Between the Government of the Republic of Indonesia and the Government of the Republic of Chile for the Incorporation of Provisions on Trade in Services, which was originally signed on 21 November 2022 in Jakarta, Indonesia.

71. Regulation of the President No. 67 of 2025 on the Ratification of the Agreement under the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas Beyond National Jurisdiction

Enforcement Date: 4 June 2025

Summary:

- This Regulation ratifies the Agreement under the United Nations Convention on the Law of the Sea (UNCLOS) on the Conservation and Sustainable Use of Marine Biological Diversity of Areas Beyond National Jurisdiction, which was originally signed on 20 September 2023 in New York, USA.

72. Regulation of the Minister of Law No. 16 of 2025 on the Reporting of Wills and Applications for the Issuance of Will Certificate Letters

Enforcement Date: 28 November 2025

Summary:

- Upon entering into force, this Regulation will ultimately repeal and replace Regulation of the Minister of Law and Human Rights No. 60 of 2016 on Procedures for the Electronic Reporting of Wills and Applications for the Issuance of Will Certificate Letters ("**Regulation 60/2016**"). In comparison to Regulation 60/2016, which only governed electronic applications for the will deed list, nil list and will certificate letters (*Surat Keterangan Wasiat* – "**SKW**"), this new Regulation is now set to introduce non-electronic services in order to accommodate data corrections, as well as the reporting of wills and SKW.
- Interestingly, the Regulation also now governs the submission of wills by foreign nationals who draw up wills in Indonesia. In this regard, the relevant notaries will be required to fill out additional forms that include the testator's country of origin and passport number, in addition to the main form, which must be completed with the testator's identity and the identity of the will deed, as originally addressed under Regulation 60/2016.
- Moreover, the Regulation now allows applications for the correction of will reporting to be submitted to the central will registry through notaries in response to any incorrect inputs that are discovered regarding the identities of testators and/or will deeds. Meanwhile, SKW corrections may also be requested if discrepancies relating to any will data set out in SKW issued by the central will registry are discovered.

73. Circular of the Director-General of the General Judiciary Office No. 3 of 2025 on the Reporting of Gratuities

Enforcement Date: 14 May 2025

Summary:

- This new Circular states that judges and court officials are now obligated to refuse all forms of gratuities that specifically relate to their positions and/or that violate their official duties. In this regard, the Circular also clarifies that said parties are required to report gratuities if refusal has not been possible. The types of gratuities that must be reported include: 1) Monetary gifts and/or their equivalent, goods, facilities or other forms of gratuities that are given as a token of appreciation; 2) Monetary or equivalent gifts, goods, facilities or other forms of gratuities that are received from employees of other institutions, business partners and/or third parties; and 3) Transportation, accommodation, entertainment, tour packages and/or other facilities.
- The Circular further clarifies that both the acceptance and refusal of gratuities must be reported to the Corruption Eradication Commission (*Komisi Pemberantasan Korupsi*/KPK) within 30 days of any such acceptance or refusal. Specifically, reporting may be carried out through the following methods: 1) Via the GOL application, which can be found at: https://gol.kpk.go.id or downloaded through the Google Play Store; 2) Via email to: pelaporan.gratifikasi@kpk.go.id along with a completed form, which is accessible at: https://bit.ly/mari_laporgratifikasi; and/or 3) For Echelon I officials and judges working at the Supreme Court specifically, via the Gratuities Control Unit (*Unit Pengendalian Gratifikasi*/UPG) of the Supervisory Agency, which can be found at: upg.bawas@mahkamahagung.go.id.

74. Decree of the Director-General of the General Judicial Office No. 1060/DJU/SK.TI1/VI/2025 on the Amendment to Decree of the Director-General of the General Judicial Office No. 114/DJU/SK.HM1.1.1/I/2024 on Updated Guidelines on One-Stop Integrated Service Standards (PTSP) at the High Court and District Court

Enforcement Date: 16 June 2025

Summary:

- While maintaining the core standards for case settlement services that are applicable at district and high courts across the country, as originally stipulated under Decree of the Director-General of the General Judicial Office No. 114/DJU/SK.HM1.1.1/I/2024, this Decree has now revised the applicable service timeframes as follows: 1) Delegation of case files: one hour; and 2) Settlement of regular criminal cases: a maximum of five months. It should be noted that the case-file delegation timeframe mentioned in point (1) above did not previously feature.

75. Draft Regional Regulation of the Province of DKI Jakarta on No Smoking Areas

Enforcement Date: -

Summary:

- This Draft Regulation designates 10 types of public facilities located in the Special Capital Region of Jakarta (*Daerah Khusus Ibukota Jakarta* – "**DKI Jakarta**") as no smoking areas (*Kawasan Tanpa Rokok* – "**KTR**"). In this regard, the forthcoming framework specifies KTR for the following types of public facilities: 1) Six types of public facilities (e.g. healthcare service facilities, educational institutions, children's playgrounds), including spaces, rooms or areas that extend up to the outermost fences/boundaries of the relevant facilities; 2) Workplaces, public places, integrated public spaces and certain locations in which public gatherings are permitted, including spaces, rooms or areas that extend up to the drip lines of outermost roofs.
- In terms of the various locations that are outlined in point (2) above specifically, the Draft Regulation mandates that said locations should provide designated smoking areas. However, this obligation does not apply to any locations that pose potential health and occupational safety hazards in accordance with applicable Laws and Regulations.
- It should also be noted that this Draft Regulation mandates that organizers of the above-outlined KTR areas should carry out the following activities: 1) Conduct internal supervision within the places and/or locations that they are responsible for; 2) Prohibit all individuals from smoking in the KTR that they are responsible for; 3) Remove ashtrays or similar items from the places and/or locations that they are responsible for; 4) Display no smoking signs in accordance with the requirements at all main entrances and in other appropriate and clearly visible and/or audible locations; and 5) Establish an internal task force that will assume responsibility for the supervision and enforcement of the KTR. Any KTR area organizers that violate these obligations will be subject to the imposition of administrative fines of up to Rp. 50 million.
- If this Draft Regulation ultimately comes into force, then various KTR-related provisions that specifically feature under Regional Regulation of DKI Jakarta No. 2 of 2005 on Air Pollution Control ("**Regulation 2/2005**") will be repealed and replaced. However, certain provisions that feature under the framework of Regulation 2/2025 may remain in effect, provided that they are in line with the new provisions that have been outlined under the Draft Regulation.