

Regulation Summary - November 2025

General Corporate

1. Regulation of the Financial Services Authority No. 24 of 2025 on Account Management at Commercial Banks

Enforcement Date: 10 November 2025

Summary:

- In essence, this Regulation now classifies the management of checking and savings accounts as follows: 1) Active account: an account associated with ongoing deposit, withdrawal or balance checking activities; 2) Inactive account: an account that has not seen any deposit, withdrawal or balance checking activities for more than 360 days; and 3) Dormant account: an account that has not seen any deposit, withdrawal or balance checking activity for more than 1800 days. However, checking and savings accounts that are owned by customers for certain purposes (e.g. basic savings accounts, hajj savings and cash waqf-linked deposit accounts), with term deposit features or that are currently being disputed, will remain classified as active accounts.
- This Regulation requires all commercial banks ("**Banks**") to establish sets of policies and procedures that address the administration of the above-outlined checking and savings accounts. These policies and procedures should include the following elements: 1) Notification of customers who open checking and savings accounts regarding the criteria for determinations of the classification of active accounts (e.g. the automatic closure of accounts); 2) Information that is provided to customers through available channels at Banks regarding the classification of accounts; 3) Flagging of accounts through Banks' internal systems for certain reasons (e.g. separation of accounts from other accounts in order to meet applicable reporting requirements); 4) Internal monitoring and control of inactive accounts and dormant accounts; and 5) Automatic closure of checking and savings accounts if they have a zero balance for a maximum period of six months.
- In addition to notifying customers of the statuses of their inactive accounts through available Bank channels, this new framework also mandates that Banks should deactivate withdrawal functionality for inactive accounts. Furthermore, in terms of dormant accounts, this Regulation requires Banks to also make reasonable and sufficient efforts to request that the relevant customers reactivate their checking and savings accounts. These

reasonable and sufficient efforts should be completed in line with the following periods: 1) Once a year: for accounts with a total balance of more than Rp. 1 billion; 2) Once every three years: for accounts with a total balance of between Rp. 100 million and Rp. 1 billion; and 3) Once every five years: for accounts with a total maximum balance of Rp. 100 million.

2. Decree of the Minister of Immigration and Corrections No. M.IP-19.GR.01.01 of 2025 on the Working System at Immigration Checkpoints

Enforcement Date: 14 November 2025

Summary:

- This Regulation explains that the Directorate-General of Immigration has implemented a technology-driven inspection system, which includes automated gates (Autogate) and facial recognition devices at immigration checkpoints. This system is being supported by the Passenger Analysis Unit.
- This Regulation also sets out specific provisions on Immigration Inspection Procedures and Stages. In this regard, inspections at immigration checkpoints are to be carried out in a layered, tiered and coordinated manner that comprises three stages: 1) Prior to arrival or departure; 2) During arrival or departure; and 3) After arrival or departure.
- During the pre-arrival or pre-departure stage, early detection, risk identification and administrative checks will be conducted, including the potential issuance of a “NOT OK TO BOARD” status through the Interactive Advance Passenger Information (iAPI) system. During arrival or departure, officers will carry out verification, validation, profiling and decision-making through autogate or immigration counters, with high-risk passengers being directed to secondary inspections.

Banking

3. Regulation of the Financial Services Authority No. 24 of 2025 on Account Management at Commercial Banks

Enforcement Date: 10 November 2025

Summary:

- This Regulation establishes a standardized framework for the management of giro and savings accounts by commercial banks (“**Banks**”) in order to

enhance customer protection and prevent any misuse. This new framework replaces previously inconsistent, varied internal Bank policies by establishing uniform account status classifications that are based on customer-initiated activities (i.e. deposits, withdrawals and balance checking). Said classifications break down as follows: 1) Active account: there must be signs of customer-initiated activities; 2) Inactive account: no customer activities have been recorded for more than 360 days; and 3) Dormant account: no customer activities have been recorded for more than 1800 days.

- This Regulation requires Banks to implement standardized policies and procedures for account management, with compliance mandated by 10 May 2026. Furthermore, Banks are prohibited from imposing any administrative fees that may lead to account balances dipping into the negative and Banks are also obliged to apply sound risk management and internal controls. Additionally, this new framework emphasizes customer protection by requiring Banks to safeguard all of their personal data and maintain the confidentiality of all customer information in line with prevailing Laws and Regulations.
- The new Regulation requires Banks to notify customers whenever their accounts become classified as inactive or dormant and certain account features are disabled. Meanwhile, reactivation requests may be submitted through designated channels. The framework also mandates that Banks may manage dormant accounts for periods of up to 30 years without treating the relevant funds as Bank assets. Any Banks that ultimately fail to comply with these obligations will be subject to tiered administrative sanctions, ranging from written reprimands to restrictions on business activities and reductions in governance assessments.

4. Regulation of the Bank Indonesia Board of Governors No. 22 of 2025 on the Amendment to Regulation of the Bank Indonesia Board of Governors No. 21 of 2023 on the Implementing Regulation on Short-Term Liquidity Loans for Conventional Commercial Banks

Enforcement Date: 20 October 2025

Summary:

- Bank Indonesia (“**BI**”) has issued an amendment (“**Amendment**”) to the Implementing Regulation on Short-Term Liquidity Loans (*Pinjaman Likuiditas Jangka Pendek* – “**PLJP**”) for Conventional Commercial Banks (*Bank Umum Konvensional* – “**BUK**”). The Amendment introduces two new types of eligible collateral, specifically BI Floating Rate Notes (“**BI-FRN**”) and other high-rated securities. This new framework also revises the BI departments that are involved in correspondence and communications related to PLJP applications and reporting.
- Under the Amendment, BI-FRN are now recognized as high-quality PLJP collateral, equivalent to other types of BI-issued securities, including BI Certificates (*Sertifikat BI/SBI*), BI Deposit Certificates (*Sertifikat Deposito*

BI/SDBI) and BI *Sukuk* (SukBI). BI-FRN follows the usual requirements and procedures for collateral eligibility, valuation and execution, including a minimum remaining maturity of 110 days. Furthermore, the BI-FRN collateral value has been set at 100% of its selling value, as recorded in the BI-Scripless Securities Settlement System (BI-SSSS), with a 0% haircut rate applying.

- Meanwhile, specific requirements and the implementation of other high-rated securities will be announced by BI through its official channels. Details will cover aspects such as collateral eligibility, valuations, verifications and execution procedures. This approach will allow BI flexibility when determining applicable requirements based on the types and characteristics of said securities.

5. Regulation of the Bank Indonesia Board of Governors No. 23 of 2025 on the Macroprudential Intermediation Ratio and the Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units

Enforcement Date: 20 October 2025

Summary:

- In comparison with the now-revoked framework of Regulation of the Bank Indonesia (“BI”) Board of Governors No. 21/22/PADG/2019, as amended several times, most recently through Regulation of the BI Board of Governors No. 11 of 2025 (collectively referred to as “**Regulation 22/2019**”), this Regulation has now expanded the list of securities and sharia securities that can be counted in relation to the Macroprudential Liquidity Buffer (*Penyangga Likuiditas Makroprudensial* - “**PLM**”) and Sharia PLM by including the following: 1) BI - Floating Rate Note (“**BI-FRN**”); and 2) Securities issued by other financial service institutions established or founded by the government in order to support government public welfare programs, as determined by BI.
- While maintaining the majority of data and value sources that should be utilized during calculations of the Sharia Macroprudential Intermediation Ratio (*Rasio Intermediasi Makroprudensial* - “**RIM**”) that were originally outlined under Regulation 22/2019, this new framework has now redefined “credit data” as “financing data in rupiah and foreign currencies”. This financing data will be sourced from non-bank financing items in the financial information group – daily financial position report information on the 15th day of the month and at the end of the previous month for integrated commercial bank reports (*Laporan Bank Umum Terintegrasi/LBUT*).

6. Circular of the Financial Services Authority No. 24/SEOJK.03/2025 on Business Plans for People’s Economy Banks

Enforcement Date: 13 November 2025

Summary:

- The enforcement of the Circular has resulted in the repeal and replacement of Circular of the Financial Services Authority No. 28/SEOJK.03/2021 on Business Plans (“**Business Plans**”) for People’s Credit Banks (“**Circular 28/2021**”). While retaining most of the provisions that were originally outlined under Circular 28/2021, the new Circular now clarifies the use of professional services during the preparation of Business Plans. Said services must be appointed through a consideration of recommendations provided by the Board of Commissioners (“**BoC**”). In this regard, the BoC will evaluate the use of professional services during the preparation of Business Plans and will ensure that any such professional services are used effectively and efficiently in line with requirements, and will not ultimately reduce the independence of People’s Economy Banks (*Bank Perekonomian Rakyat* – “**BPR**”) as regards the preparation of their Business Plans.
- Without altering any of the elements that must be incorporated into Business Plans, as previously outlined under Circular 28/2021, the new Circular has now clarified various explanations and details relating to each of these elements, including the following: 1) Capital plans: instead of containing information regarding changes or additions to paid-up capital, donation capital and/or the revaluation of fixed assets, the Circular now stipulates capital coverage that comprises core capital and supplementary capital; 2) Business activity implementation plans: these must now include plans for capital participation activities and divestment plans on the initiative of BPR in relation to capital participation; 3) Development and/or changes to short-term, office network plans: these now include special financial centers and/or cash offices, as well as licensing or reporting procedures for the development of and/or changes to office networks; and 4) Other information set out in Business Plans: this element has now been clarified to include at least five types of information that are projected to affect and result in material impacts on business activities, financial performance or the risk profile of the relevant BPR, including sustainable finance action plans.
- Furthermore, the new Circular, in comparison with Circular 28/2021, has also expanded the reasons for which the OJK can request that BPR revise Business Plans that have already been submitted to now include deteriorating financial conditions that result in problems with a BPR’s health, liquidity and capital adequacy levels. Moreover, the Circular also now allows BPR to submit requests for Business Plan adjustments in the event that certain external and internal factors affect the operational activities and/or performances of a BPR and increased risk potentials emerge.

Capital Market

7. Decree of the Board of Directors of PT Bursa Efek Indonesia No. KEP-00079/BEI/11-2025 on the Regulation of Carbon Exchange Users

Enforcement Date: 6 November 2025

Summary:

- While maintaining the registration fee that must be paid to the organizer of the Carbon Exchange (*Penyelenggara Bursa Karbon* - “**PBK**”) in order to become Carbon Exchange service users (“**Users**”), this Decree has now officially extended the exemption period for the payment of this mandatory registration fee until 1 January 2027. The previous framework set a deadline of 25 September 2025 for this registration fee exemption.
- This Decree also revises the list of requirements that must be met in order to become a User, as originally outlined under the previous framework. One of the notable additions to this list is the new requirement to possess a bank account that is connected to the Bank Indonesia-FAST (“**BI-FAST**”) and Bank Indonesia Real-Time Gross Settlement (“**BI-RTGS**”) systems. This additional requirement applies to Indonesian legal entities that are prospective Users.
- If any foreign legal entities wish to become Users, then this Decree now requires said entities to secure company registration certification and to comply with one of the following directives: 1) Possession of a bank account connected to the BI-FAST and BI-RTGS systems or other mechanisms determined by BI and facilitated by PBK; 2) Possession of a bank account that can be utilized by prospective Users; or 3) Cooperation arrangement with another party that has been issued a business permit by a competent authority and that has been appointed by the prospective User to handle fund transfers to and from the PBK account.

Employment

8. Regulation of the Minister of Manpower No. 11 of 2025 on the Amendment to Regulation of the Minister of Manpower No. 8 of 2025 on Guidelines on the Granting of Government Assistance Through the University Graduate Internship Program

Enforcement Date: 30 October 2025

Summary:

- While the original framework of Regulation of the Minister of Manpower No. 8 of 2025 only allowed companies that met certain requirements to become

organizers of the University Graduate Internship Program (“**Organizers**”), the Amendment has now expanded the list of eligible Organizers to also include the following entities: 1) Government agencies; and/or 2) Independent state institutions.

- As a consequence, the organization of the aforementioned internship program should follow the working days of any institution that is officially designated as an Organizer.

9. Regulation of the Minister of Manpower No. 12 of 2025 on the Second Amendment to Regulation of the Minister of Manpower No. 35 of 2016 on Procedures for the Provision of, Requirements for and Types of Additional Service Benefits Through the Old Age Security Program

Enforcement Date: 10 November 2025

Summary:

- The Second Amendment revises the maximum interest rates that can be charged to participants in the Old-Age Benefits (*Jaminan Hari Tua*/JHT) program (“**Participants**”) in relation to the Housing Down Payment (*Pemanfaatan Uang Muka Perumahan* – “**PUMP**”), Home Ownership Credit (*Kredit Kepemilikan Rumah* – “**KPR**”) and House-Renovation Facilities (*Pinjaman Renovasi Perumahan* – “**PRP**”) programs. Interest rates for Participants have now been capped at a maximum of 3% above the Bank Indonesia (“**BI**”) benchmark interest rate, replacing the previous ceiling of 5% above the BI Seven Day Reverse Repo Rate. In addition, the deposit interest rate used to support PUMP, KPR and PRP distribution has now been set at a maximum of 2% above the BI benchmark interest rate.
- The Second Amendment also updates the interest rate that is applicable to Housing Development Companies in relation to worker housing financing facilities. This interest rate has now been limited to a maximum of 4% above the BI benchmark interest rate. Likewise, the deposit interest rate used to support the distribution of said worker housing financing facilities has been capped at a maximum of 2% above the BI benchmark interest rate.

10. Regulation of the Minister of Manpower No. 13 of 2025 on Occupational Health and Safety Supervisory Committees

Enforcement Date: 19 November 2025

Summary:

- The Minister of Manpower recently updated Indonesia’s framework on the organization of Occupational Health and Safety Supervisory Committees (*Panitia Pembina Keselamatan dan Kesehatan Kerja* – “**P2K3**”). The new framework broadens the criteria for the identification of high-risk

workplaces, sets out more detailed requirements regarding the composition of P2K3 and has also expanded their various functions.

- The P2K3 appointment process has also been formalized and now involves written or electronic submissions being made by employers to the Minister of Manpower, as well as relevant Provincial Regional Offices, which will then issue approvals. Submissions should also include various required supporting documents which address subjects such as a P2K3's organizational structure and the appointment of an occupational health and safety (*keselamatan dan kesehatan kerja* – “**K3**”) expert. Furthermore, any updates that are made to a P2K3's membership structure must be reported by the chairperson within two business days, accompanied by documents outlining the revised composition, as well as other necessary documentation.
- Regulation 13/2025 also revises the reporting obligation for P2K3 activities from quarterly to semi-annual submissions, or as deemed necessary, as well as requiring a structured reporting format that covers company data, K3 personnel and infrastructure, work accidents and P2K3 activities. An electronic reporting system is also set to be introduced and will come fully online after completion of a one-year transition period, during which time reports should continue to be submitted manually. These provisions have been introduced in an effort to improve workplace safety, clarify various roles and enhance overall monitoring and compliance.
- For more information, see ILB No. 5266.

11. Regulation of Minister of Manpower No. 14 of 2025 on Business Activity Standards and Product/Service Standards for the Implementation of Risk-Based Business Licensing Within the Manpower Sector

Enforcement Date: 21 November 2025

Summary:

- In order to bring Risk-Based Business Licensing (*Perizinan Berusaha Berbasis Risiko* – “**PBBR**”) within the manpower sector further into line with Regulation of the Government No. 28 of 2025, this Regulation establishes an extensive set of general provisions that address Business Licenses (*Perizinan Berusaha*/PB) and Business Licenses to Support Business Activities (*Perizinan Berusaha untuk Menunjang Kegiatan Usaha*/PB UMKU) that apply within the manpower sector. It should be noted that while the previous framework classified the list of activities and products/services that fell under the mandatory standard requirements into those with and without corresponding Standard Classifications of Indonesian Business Fields (*Klasifikasi Baku Lapangan Usaha Indonesia* – “**KBLI**”), this new Regulation no longer features any such KBLI-based distinctions.
- This new Regulation also introduces several new specific obligations that certain manpower-sector businesses must comply with, including obligations that relate to occupational health and safety (*Keselamatan dan*

Kesehatan Kerja – “K3”). In this regard, the various types of businesses that these new obligations apply to include: 1) Outsourcing businesses associated with low levels of risk (e.g. must apply K3 and environmental standards, register all outsourcing agreements and so forth); 2) Fabrication, maintenance, repair and installation services relating to K3 engineering work (e.g. obligations that apply to certain K3 objects); 3) Laboratory testing service businesses for K3 inspections and testing activities (e.g. must be accredited by the National Accreditation Committee and must be in possession of calibrated equipment and implementation reports); and 4) Providers of periodic K3 inspection services (e.g. must be in possession of calibrated equipment and implementation reports).

- Newly clarified under this Regulation, any businesses that fail to comply with the above-outlined requirements and obligations that specifically relate to manpower sector PBBR will be subject to the imposition of administrative sanctions. These sanctions range from written reprimands through temporary suspensions of business activities to the revocation of issued PBBR. In this regard, this Regulation explicitly outlines a total of nine violations that may lead to the imposition of said sanctions (e.g. failure to submit reports, failure to comply with PBBR-related obligations, failure to commence business operations within a one-year period and so forth).

12. Decree of the Minister of Manpower No. 393 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Category of Professional, Scientific and Technical Activities, Main Group of Architectural and Engineering Activities; Analysis and Technical Testing for the Job Position of Tank Storage Inspector

Enforcement Date: 10 November 2025

Summary:

- This Decree officially stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia – “SKKNI”*) for the category of Professional, Scientific and Technical Activities, Main Group of Architectural and Engineering Activities; Analysis and Technical Testing for the Job Position of Tank Storage Inspector, which may be utilized by educational and training institutions, as well as the business/industrial sector, manpower users, and testing and certification institutions as a reference during the formulation of national qualification levels, as well as during the organization of education, training and competency certification.
- A total of 18 competency units are outlined under the Appendix to the Decree and include the following: 1) Application of occupational health and safety measures within the workplace; 2) Identification of tank storage classifications; 3) Verification of tank storage documents; 4) Inspection of above-ground steel tanks during construction; 5) Preparation of tank inspection reports; and so forth.
- Upon the enforcement of the Decree, the previous framework that addressed the Determination of the Indonesian National Work Competency

Standards for the Category of Professional, Scientific and Technical Services, Main Group of Architectural and Civil Engineering Services; Analysis and Technical Testing for the Job Position of Tank Storage Inspector, as outlined under Decree of the Minister of Manpower and Transmigration No. 124 of 2014, was officially repealed and replaced.

13. Decree of the Minister of Manpower No. 394 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Financial and Insurance Activities Category, Main Group of Financial Service Activities, Excluding Insurance and Pension Funds, Within the Field of People's Sharia Economic Banks

Enforcement Date: 10 November 2025

Summary:

- This Decree stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* – “**SKKNI**”) for the Financial and Insurance Activities Category, Main Group of Financial Service Activities, Excluding Insurance and Pension Funds, Within the Field of People's Sharia Economic Banks, which are set out under the Appendix to this Decree and which will now serve as a reference during the development of national qualification levels, the delivery of education and training, and in relation to the issuance of competency certification. It should be noted that the SKKNI will be reviewed every five years or as required.
- A total of 35 relevant competence units are outlined under the Appendix to the Decree, including: 1) Application of Islamic economic principles in relation to sharia banking; 2) Administration of customer deposit management; 3) Implementation of the cash *waqf* social function; 4) Drawing up of business plans; and 5) Application of anti-money laundering, counter-terrorism financing and counter-proliferation financing measures.

14. Decree of the Minister of Manpower No. 395 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Mining and Excavation Category, Main Group of Mining Support Service Activities, Within the Field of Supply Chain Management

Enforcement Date: 10 November 2025

Summary:

- This Decree stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* – “**SKKNI**”) for the Mining and Excavation Category, Main Group of Mining Support Service Activities, Within the Field of Supply Chain Management, which are set out under the Appendix to this Decree and which will now serve as a reference during the

development of national qualification levels, the delivery of education and training, and in relation to the issuance of competency certification. It should be noted that the SKKNI will be reviewed every five years or as required.

- A total of 52 relevant competence units are outlined under the Appendix to the Decree, including: 1) Planning for supply chain management strategies; 2) Development of a continuously improving system; 3) Provision of explanations of procurement documents (Pre-bid); 4) Preparation of contractor asset management reports in relation to cooperation contracts; and 5) Re-exportation of operational goods and consignment residuals relating to leased oil and gas.

15. Decree of the Minister of Manpower No. 411 of 2025 on the Stipulation of Indonesian National Work Competency Standards for the Category of Financial and Insurance Activities, Main Group of Financial Services Activities, Excluding Insurance and Pension Funds, Within the Pawnshop Sector

Enforcement Date: 12 November 2025

Summary:

- This Decree stipulates Indonesian National Work Competency Standards (*Standar Kompetensi Kerja Nasional Indonesia* – “**SKKNI**”) for the Financial Activities and Insurance Category, Main Group of Financial Services Activities, Excluding Insurance and Pension Funds, Within the Pawnshop Sector, which are set out under the Appendix to this Decree and which will now serve as a reference for the development of national qualification levels, the delivery of education and training, and in relation to the issuance of competency certification. It should be noted that the SKKNI will be reviewed every five years or as required.
- A total of 33 relevant competence units are outlined under the Appendix to the Decree, including: 1) Testing of electronic collateral items; 2) Identification of risks that may emerge during pawnshop operations; 3) Implementation of risk controls during pawnshop operations; 4) Planning of internal audits of pawnshop activities; and 5) Ensuring compliance with Laws and Regulations that specifically relate and apply to pawnshop companies.

Energy

16. Regulation of the Minister of Energy and Mineral Resources No. 18 of 2025 on Implementing Regulation of the Government No. 39 of 2025 on the Second Amendment to Regulation of the Government No.

96 of 2021 on the Implementation of Mineral and Coal-Mining Business Activities

Enforcement Date: 18 November 2025

Summary:

- In essence, this Regulation sets out a new mechanism for the granting of the following types of Mining Business Permit Areas (*Wilayah Izin Usaha Pertambangan* – “**WIUP**”), as determined by the Minister of Energy and Mineral Resources (“**Minister**”) after joint verification processes that are conducted in conjunction with the Nuclear Energy Regulatory Agency (*Badan Pengawas Tenaga Nuklir* – “**BAPETEN**”). This new mechanism addresses the following types of areas: 1) Radioactive mineral WIUP; 2) Metallic mineral WIUP; 3) Coal WIUP; 4) Non-metallic mineral WIUP; 5) Certain types of non-metallic mineral WIUP; and 6) Rock WIUP. However, it should be noted that under the new Regulation, coal WIUP may also be secured through auctions or priority allocations. Meanwhile, certain types of non-metallic mineral WIUP and coal WIUP may be secured through territorial applications.
- In addition to the aforementioned WIUP, the Regulation also outlines the mechanism for the granting of Special Mining Business Permit Areas (*Wilayah Izin Usaha Pertambangan Khusus* – “**WIUPK**”) for metallic mineral and coal WIUPK, which may be secured through auctions or priority allocations. Said priority allocations may be applied for by the following parties, provided that they first fulfill various administrative, technical and commitment statement requirements: 1) Cooperatives; 2) Small- and medium-scale enterprises; 3) Business entities that are owned by religious community organizations; and 4) State-owned enterprises, regionally owned enterprises and private business entities in order to enhance access to higher education for the public, as well as to improve the independence and excellence of higher education institutions.
- It should also be noted that this new Regulation also outlines a number of provisions that specifically address the management of People’s Mining Areas (*Wilayah Pertambangan Rakyat* – “**WPR**”), including: 1) Determination of WPR; 2) WPR management documents; 3) Issuance of People’s Mining Permits (*Izin Pertambangan Rakyat* – “**IPR**”); and 4) Implementation of IPR. Generally speaking, WPR will be proposed by the relevant governor, subject to certain requirements that commence with a consideration of the relevant Mining Area (*Wilayah Pertambangan* – “**WP**”) planning, WP or amendments to WP, and which extend to the types of commodities that will be mined. Said commodities must comprise primary metallic mineral reserves up to a maximum depth of 100 meters or secondary mineral reserves that are located in rivers and/or between riverbanks. It should be noted that the aforementioned WPR should be proposed by the relevant governor for every single block, up to a maximum area limit of 100 hectares.

17. Regulation of the Minister of Finance No. 73 of 2025 on Procedures for the Provision, Calculation, Payment and Accountability of Compensation Funds for Business Entity Revenue Shortfalls Resulting from Policies on the Determination of Retail Fuel Prices and Electricity Tariffs

Enforcement Date: 19 November 2025

Summary:

- This Regulation sets out a new policy framework for projections of Fuel and Electricity Compensation Funds (collectively referred to as “**Compensation Funds**”), which covers four key elements: 1) Establishment of annual projected amounts of Compensation Funds as the basis for budgeting; 2) 70% of the monthly reviewed calculation should be paid out each month; 3) The Minister of Finance may adjust this percentage based on the state’s fiscal condition; 4) Payments must also take into account the Audit Board’s (*Badan Pemeriksa Keuangan/BPK*) findings on Compensation Funds that were disbursed during the previous fiscal year.
- This Regulation also revises the timeline for the submission of Compensation Funds, Management Assertions and calculations by business entities. Calculations of Compensation Funds up to September must now be submitted by no later than 1 December, while Management Assertions and calculations up to December must be submitted by 20 January of the following year. In addition, the review schedule, as undertaken by the Financial and Development Supervisory Agency (*Badan Pengawasan Keuangan dan Pembangunan/BPKP*), has now been accelerated, requiring the relevant review results to be delivered to the Director-General of Budget Financing and Risk Management within 10 working days of the required documents being received in full.
- Furthermore, under this framework, business entities are required to submit the necessary data, documents and/or reports in the form of electronic transaction data to the Inspectorate-General at the Ministry of Finance through the Ministry of Finance’s data service system on a monthly basis.

18. Decree of the Minister of Energy and Mineral Resources No. 344.K/MB.01/MEM.B/2025 on Technical Guidelines for Reclamations and Post-Mining Work after Mineral and Coal Mining Business Activities

Enforcement Date: 23 October 2025

Summary:

- Outlined comprehensively under the Appendices to this Decree are a set of guidelines that address the implementation of a series of activities aimed at improving the quality of the environment so that it can function again in accordance with its designated purposes (“**Reclamations**”). The guidelines

also address planned, systematic and continuous activities aimed at restoring natural environmental functions and social functions in accordance with prevailing local conditions in mining areas (“**Post-Mining**”) after the completion of mineral and coal mining business activities (“**Guidelines**”). The Guidelines address four areas that cover the following specific aspects: 1) Management of Reclamation and Post-Mining work after mineral and coal mining business activities in land and marine areas; 2) Reclamation cost standards; 3) Reopening of areas that undergo Reclamation processes after mineral and coal mining business activities; and 4) The appointment of third parties as executors and/or assessors of the achievement of Reclamation and/or Post-Mining work after mineral and coal mining business activities.

- This Decree mandates that relevant holders of Mining Business Licenses (*Izin Usaha Pertambangan* – “**IUP**”) and/or Special IUP (*Izin Usaha Pertambangan Khusus* – “**IUPK**”) must now submit Reclamation and/or Post-Mining plans in order to secure approvals within 45 business days of the relevant mining permits being secured. Moreover, this Decree newly details Reclamation plans for marine areas, as well as related assessment criteria that will be applied in order to affirm the achievement of said plans.
- Reclamation collateral (for both the exploration and production operation stages, as well as for Reclamations that are carried out in marine areas) will be disbursed if the relevant Reclamation assessment results in a final achievement score of at least 60%. Meanwhile, Post-Mining collateral may only be fully disbursed if the relevant Post-Mining assessment results in a final achievement score of 100%.

19. Decree of the Minister of Energy and Mineral Resources No. 348.K/MB.01/MEM.B/2025 on Reference Prices for Metal Minerals and Reference Prices for Coal for the First Period of November 2025

Enforcement Date: 1 November 2025

Summary:

- This Decree sets Reference Metal Mineral Prices (*Harga Mineral Logam Acuan* – “**HMA**”) and Reference Coal Prices (*Harga Batubara Acuan* – “**HBA**”) for the First Period of November 2025. The HMA and HBA values will now serve as the basis for calculations of Reference Metal Mineral Benchmark Prices (*Harga Patokan Mineral Logam*/HPM) and Coal Reference Benchmark Prices (*Harga Patokan Batubara*/HPB) for the corresponding period.
- As detailed under Appendix I to the Decree, the established HMA include: 1) Nickel (US\$ 15,075.33/DMT); 2) Copper (US\$ 10,662.07/DMT); 3) Gold as an associated mineral (US\$ 4,110.53/troy ounce); 4) Silver (US\$ 50.37/troy ounce); 5) Manganese (US\$ 3.32/DMT); and so forth.
- Meanwhile, the applicable HBA are comprehensively detailed under Appendix II to the Decree and should be utilized as a reference during calculations of Coal Benchmark Prices (*Harga Patokan Batubara*/HPB).

The HBA for the first period of November 2025 include: 1) Coal (with 6,322 kcal/kg Gross as Received [**GAR**]): US\$103.75/ton; 2) Coal Category I (with 5,300 kcal/kg GAR): US\$ 67.22/ton; 3) Coal Category II (with 4,100 kcal/kg GAR): US\$ 44.02/ton; and 4) Coal Category III (with 3,400 kcal/kg GAR): US\$ 33.74/ton.

20. Draft Regulation of the Minister of Forestry on Procedures for Carbon Trading Through Greenhouse Gas Emissions Offsets Within the Forestry Sector

Enforcement Date: -

Summary:

- If this Draft Regulation ultimately comes into force, then it will bring the current carbon trading mechanism for the forestry sector into line with that stipulated under Regulation of the President No. 110 of 2025 (**“Regulation 110/2025”**). By no longer featuring the greenhouse gas (**“GHG”**) emissions trading mechanism currently in force under the framework of Regulation of the Minister of Environment and Forestry No. 7 of 2023 (**“Regulation 7/2023”**), the primary focus of the Draft Regulation has now shifted to carbon trading via GHG emissions offsetting.
- The Draft Regulation also details the criteria that apply to businesses that wish to participate in the aforementioned emissions offset trading. These criteria include the securing of the following permits and approvals: 1) Business Permits for Forest Utilization (*Perizinan Berusaha Pemanfaatan Hutan* - **“PBPH”**) and management rights; 2) Approvals for the Management of Social Forestry; and 3) Business Permits for the Utilization of Carbon Environmental Services (*Perizinan Berusaha Pemanfaatan Jasa Lingkungan Karbon/Carbon PB-PJL*). Moreover, the Draft Regulation has also revised the list of carbon sources that are available for carbon trading activities within the forestry sector.
- In line with Regulation 110/2025, the carbon units that are now available for trading comprise GHG Reduction Certificates (*Sertifikat Pengurangan Emisi Gas Rumah Kaca* - **“SPE GRK”**), as issued by the Minister of the Environment, and Non-SPE GRK, which are issued in line with international standards. Furthermore, any businesses that engage in carbon trading activities will now be required to apply social protection principles aimed at minimizing the negative impacts that are associated with carbon trading (including the application of the Free, Prior and Informed Consent [FPIC]) principle and the establishment of risk management systems in order to manage climate change mitigation actions and carbon trading.

Environment

21. Regulation of the Minister of Environment/Head of the Environmental Control Agency No. 20 of 2025 on the Standard Criteria for Environmental Damage to Land Resulting from Mining Business and/or Activities

Enforcement Date: 23 October 2025

Summary:

- This Regulation requires the parties responsible for mining business and/or mining activities ("**Persons-in-Charge**") to prevent any environmental damage by engaging in a series of compliance and monitoring measures based on the Standard Criteria for Environmental Damage to Land Resulting from Mining Business and/or Activities ("**Standard Environmental Damage Criteria**").
- The aforementioned Standard Environmental Damage Criteria should be stipulated based on the following parameters: 1) Physical (e.g. former mining areas, topsoil, slopes and so forth); 2) Chemical (e.g. materials that have the potential to cause changes to the condition of a given location due to their interaction with surface water and air); and 3) Biological (e.g. surrounding vegetation, land cover of revegetation areas and biodiversity).
- Persons-in-Charge are also required to draft and submit reports that address the results of monitoring and compliance with the above-outlined Standard Environmental Damage Criteria to the Minister of Environment/Head of the Environmental Control Agency or relevant governors in line with their respective jurisdictions. If a given report suggests that environmental damage has occurred, then the relevant Person-in-Charge will be required to engage in mitigation and/or restoration efforts.

22. Regulation of the Minister of Environment/Environmental Control Agency No. 22 of 2025 on the Issuing Authority for Environmental Approvals

Enforcement Date: 27 October 2025

Summary:

- Regulation of the Minister of Environment ("**Minister**")/Environmental Control Agency (*Badan Pengendalian Lingkungan Hidup* – "**BPLH**") No. 22 of 2025 ("**Regulation 22/2025**") governs the authority, scope and procedures for the issuance of Environmental Approvals (*Persetujuan Lingkungan* – "**PL**") through Indonesia's risk-based business licensing framework, replacing the previous Environmental Impact Assessment (*Analisis Mengenai Dampak Lingkungan Hidup* – "**Amdal**") evaluation mechanism.

- PL are issued through the Environmental Information System, which has been integrated into the Online Single Submission (OSS) system. Furthermore, special provisions apply to non-business entities and projects that are implemented across administrative borders or that involve strategic or high-risk activities.
- The Ministry/Head of BPLH is responsible for the supervision and monitoring of the issuance of PL, which will be completed on an annual basis at least or as required. The Ministry/Head of BPLH may also impose administrative sanctions in the form of written reprimands up to two times and may also assume issuance authority from lower-level officials if violations are not corrected.

23. Regulation of the Minister of Environment/Head of the Environmental Control Agency No. 23 of 2025 on Nationally Determined Contribution Targets

Enforcement Date: 7 November 2025

Summary:

- Following the enforcement of Regulation of the President No. 110 of 2025 ("**Regulation 110/2025**"), this Regulation affirms that Indonesia's Nationally Determined Contribution ("**NDC**") targets now comprise the following elements: 1) Reduction in greenhouse gas ("**GHG**") emissions amounting to 915 million tons of CO₂e during the 2025 - 2030 period; and 2) Strengthening of national, regional and community resilience in relation to various risks arising from climate change conditions and climate resilience.
- In addition to further comprising various achievement elements (e.g. domestic efforts with international support), the target outlined in point (2) above will also apply across the following five sectors: 1) Energy; 2) Waste; 3) Industrial processes and product usage; 4) Agriculture; and 5) Forestry.
- In line with Regulation 110/2025, the above-outlined NDC targets should be achieved through the organization of climate change mitigation and adaptation efforts. Details of these efforts, including their various activity baselines, are comprehensively outlined under the Appendix to this Regulation.

24. Decree of the Minister of Environment/Head of the Environmental Control Agency No. 2567 of 2025 on Areas Experiencing Waste Emergencies

Enforcement Date: 13 October 2025

Summary:

- This Decree stipulates 336 regencies and cities across Indonesia as areas that are currently experiencing waste emergency conditions. A region will be designated as such if it meets one or more of the following criteria: 1) Does not have any final waste processing facility (*tempat pemrosesan akhir*/TPA); 2) Continues to manage waste in a non-compliant manner and engages in open dumping practices; 3) Has an Adipura waste-management performance score of 60 or below; or 4) Is currently subject to administrative sanctions related to waste management.

25. Regulation of the Head of the Nusantara Capital City Authority No. 13 of 2025 on the Amendment to Regulation of the Head of the Nusantara Capital City Authority No. 6 of 2024 on Procedures for the Review, Revision and Stipulation of the Detailed Spatial Plan for Nusantara Capital City

Enforcement Date: 18 November 2025

Summary:

- While retaining most of the provisions that were originally outlined under the framework of Regulation of the Head of the Nusantara Capital City Authority No. 6 of 2024 on Procedures for the Review, Revision and Stipulation of the Detailed Spatial Plan (*Rencana Detail Tata Ruang – “RDTR”*) for Nusantara Capital City (*Ibu Kota Nusantara – “IKN”*) (“**Regulation 6/2024**”), this new Regulation has now revised a previous reference to the ministry administering governmental affairs within the “public works and public housing” sector and has changed this term to the “public works” sector. Moreover, the new framework has also expanded the types of information that must be incorporated into any decisions that result from the harmonization of the RDTR IKN in comparison with the previous framework of Regulation 6/2024, to now include the harmonization results of other plan elements within RDTR IKN.
- In addition, the new Regulation clarifies that the review results of partial RDTR IKN revision proposals generated by the Deputy for Spatial Planning, as well as the minutes of meetings of any expert planning panel discussion, will now be used as the basis for the stipulation of approval decisions for partial RDTR IKN revision proposals by the Head of the IKN Authority. This Regulation has also now clarified the spatial utilization categories that have an impact on the public interest and IKN development as follows: 1) Government function; 2) Public service function; 3) Public and social facility function; 4) Defense and security function; 5) Infrastructure development; and so forth.
- Meanwhile, the criteria for spatial utilization that alters the overall content of the RDTR IKN by up to a maximum of 10% of the subzone area or parcel area encompass: 1) Independent provision of social and public facilities; 2) Adjustments to parcels of a limited nature, provided that said parcels support the functioning of IKN’s urban ecosystem; or 3) Other aspects that support the ecosystem. Finally, this new Regulation also clarifies the criteria

for temporary spatial utilization, as follows: 1) Must be conducted over a specific, limited timeframe; 2) Must support the public interest and IKN development; 3) Must not lead to any permanent environmental impact; or 4) Must function as a temporary support for main activities that are undertaken within the subzone.

26. Draft Regulation of the Government on the Management of Radioactive Waste

Enforcement Date: -

Summary:

- This Draft Regulation specifies that the management of radioactive waste (**“Waste Management”**) comprises the following phases: 1) Pre-storage (e.g. pre-treatment, treatment, temporary storage and/or reuse and recycling); 2) Final storage; and 3) Sustainable storage (*penyimpanan lestari*). In addition to specifying certain radiation safety requirements that must be complied with during the implementation of any Waste Management, this Draft Regulation distinguishes between the management of low- and medium-level radioactive waste (**“Waste”**) and high-level Waste. The former Waste Management category includes certain types of Waste (e.g. disused sealed/unsealed radioactive sources, as well as materials, components and equipment that are radioactive and/or that have been contaminated by radioactive substances and that are no longer in use).
- In addition to entities that generate Waste as a result of their activities (**“Waste Producers”**), Waste Management should also be undertaken by managers of Waste (**“Waste Managers”**). The Draft Regulation specifies that Waste Producers comprise businesses that have secured nuclear and radiation-related permits, while Waste Managers refer to nuclear energy implementing agencies or business entities that are working in cooperation with or that are appointed by such agencies.
- Newly featured under the Draft Regulation, any parties that have secure permits to engage in Waste Management activities are required to meet a wide range of obligations that specifically relate to Waste Management governance. These Waste Management governance obligations include the following: 1) Establishment and development of Waste Management systems; 2) Assuming responsibility for the implementation of radiation safety measures and the security of all radioactive materials; 3) Employment of qualified and competent human resources; and 4) Provision of training on radiation protection and safety to relevant human resources.

General Financial Services

27. Regulation of the Financial Services Authority No. 23 of 2025 on the Amendment to Regulation of the Financial Services Authority No. 27 of 2024 on the Implementation of Digital Financial Asset Trading Including Crypto Assets

Enforcement Date: 10 November 2025

Summary:

- This Amendment clarifies that digital financial assets ("**Assets**") will now be classified as follows: 1) Crypto Assets; and 2) Other types of Assets (including derivative Assets). In this regard, the Amendment requires any traders that buy or sell Asset derivatives on behalf of consumers to submit written notifications to the Financial Services Authority (*Otoritas Jasa Keuangan* – "**OJK**") at least seven business days prior to the commencement of any trading. Said notifications should include the following information at the least: 1) Description of the available mechanisms for marketing and trading functions, risk management, information technology infrastructure and operations; and 2) Standard operating procedures and the relevant code of ethics.
- While making no significant changes to the criteria that apply to Assets that are traded via the Asset market ("**Market**"), this Amendment now clarifies that said Assets must be issued, stored, transferred and/or traded in line with the following conditions: 1) Through the utilization of distributed ledger technology or other similar technologies; or 2) Based on underlying Assets that take the form of crypto Assets or other Assets listed on the Asset List.
- In addition to the obligation to maintain an equity level of at least 80% of paid-up capital, this Amendment now affirms that organizers of Asset exchange, clearing and settlement institutions, as well as storage location managers, are also mandated to comply with the following rules: 1) The level of paid-up capital and any additional paid-up capital during the organization of their businesses must remain compliant; and 2) All requirements that apply to businesses must always be fulfilled during all operational activities.

28. Regulation of the Minister of Finance No. 75 of 2025 on Procedures for the Implementation of Payments for Projects Financed Through the Issuance of State Sharia Securities

Enforcement Date: 19 November 2025

Summary:

- In essence, any payments that are charged to the state budget in relation to projects completed by providers of goods/services may be carried out through the advanced financing mechanism or through the special account for State Sharia Securities (*Surat Berharga Syariah Negara* - "**SBSN**"). In terms of the advanced financing mechanism particularly, payments may be

completed through the issuance of payment request letters and payment order letters within the context of fund disbursement by ministries or institutions. Said disbursements should be based on relevant Regulations on budget planning, budget implementation, budget accounting and financial reporting. Said disbursements should also be completed in response to the submission of SBSN Working Capital Payment Order Letters/Additional Working Capital Payment Order Letters, which must include the sources of pure rupiah funds and methods of withdrawal of pure rupiah funds. Additionally, payments that are completed through advanced financing will be subject to reimbursements through the issuance of SBSN.

- Subsequently, the Directorate-General of the Treasury will submit a request for the reimbursement of funds equivalent to the expenditure listed in a payment order letter of the relevant work unit based on data in the information module to the Directorate-General of Budget Financing and Risk Management as the basis for reimbursement through the issuance of SBSN. Meanwhile, payments that utilize the special account mechanism will be completed through Bank Indonesia and/or sharia commercial banks that manage the SBSN special account. Furthermore, the Directorate-General of Budget Financing and Risk Management will submit a request to the Directorate-General of Treasury to replenish the SBSN special account within the context of project payments at the beginning of each quarter.
- This Regulation also clarifies that project payments may be terminated if there is any suspension and/or cancellation of project financing in accordance with applicable Laws. It should be noted that the enforcement of this new Regulation has resulted in the simultaneous repeal and replacement of Regulation of the Minister of Finance No. 6/PMK.05/2019 on Procedures for the Implementation of Payments for Activities Financed Through the Issuance of SBSN.

29. Regulation of the Minister of Finance No. 76 of 2025 on the Second Amendment to Regulation of the Minister of Finance No. 129/PMK.05/2020 on Guidelines for the Management of Public Service Agencies

Enforcement Date: 19 November 2025

Summary:

- This Second Amendment clarifies that sources of revenue for Public Service Agencies (*Badan Layanan Umum* – “**BLU**”) comprise unrestricted grants and restricted grants. The Second Amendment also stipulates that grant revenue may take the form of: 1) Revenue in the form of money, goods, services and/or securities; 2) This is not followed by any obligation for BLU to deliver anything to the grantor; and 3) Grants that are provided without the need to follow any planning mechanism. Moreover, the aforementioned grants may originate from foreign countries or from within Indonesia.

- Under the Second Amendment, it is mandatory to register all grants. For grants from foreign countries, the relevant registration numbers will be issued by the Directorate of Evaluation, Accounting and Settlement under the Directorate-General of Budget Financing and Risk Management. Meanwhile, in terms of grants from within Indonesia, registration numbers will be issued by Regional Offices of the Directorate-General of the Treasury. It should also be noted that sources of grant funding must be treated in accordance with their intended purposes, used for operational service activities and may not be used for the payment of any remuneration.
- The Second Amendment also clarifies that grants that are received by BLU will first be subject to a consultation process with the Minister of Finance through the Directorate-General of Treasury in the event that the grant recipient is receiving a grant for the first time and/or a grant is non-recurring and is not granted to the same recipient as the previous grant. In addition, the aforementioned consultation process may be conducted through face-to-face meetings or via meetings and/or communications that are conducted through electronic means. It should also be noted that this new Regulation stipulates that grants must be set out in grant agreements or other equivalent documents.

Infrastructure and Construction Services

30.Regulation of the Minister of Public Works No. 2 of 2025 on the Implementation of Toll Road Administration Authorities

Enforcement Date: 28 October 2025

Summary:

- This Regulation governs the administration of toll roads, including the following functions: regulation, guidance, management and supervision. Various authorities are responsible for these functions, including the Directorate-General of Bina Marga (*Direktorat Jenderal Bina Marga/DJBM*), the Directorate-General of Public Works Infrastructure Financing (*Direktorat Jenderal Pembiayaan Infrastruktur Pekerjaan Umum/DJPI*), the Toll Road Regulatory Agency (*Badan Pengatur Jalan Tol/BPJT*) and the Toll Road Business Entity (*Badan Usaha di Bidang Jalan Tol – “BUJT”*).
- The Appendix to this Regulation sets out a more detailed description of the various duties and authorities that have been assigned to each of the aforementioned bodies. In comparison with the previous framework of Regulation of the Minister of Public Works and Public Housing No. 20 of 2020, which has now been revoked, this new Regulation expands the scope

of the guidance function to include the obligation of BUJT to implement and supervise the operations of rest and service areas.

- In addition, in terms of the toll road management function, BUJT is now responsible for the provision of land acquisition financing in situations where such financing is not sourced from the central government. BUJT is also required to engage in public outreach efforts in relation to toll tariffs.

31. Circular of the Director-General of Highways No. 17/SE/Db/2025 on the Amendment to Circular of the Director-General of Highways No. 12/SE/Db/2023 on Guidelines for the Provision of Replacement Land and/or Replacement Buildings by Toll Road Business Entities in Relation to Land Acquisitions for Developments in the Public Interest Within the Toll Road Sector

Enforcement Date: 17 November 2025

Summary:

- This Circular introduces various provisions that address a phased reimbursement mechanism, which may be applied whenever the cost of a replacement building exceeds Rp. 10 billion. Claims may be submitted in two stages: 1) Whenever physical progress reaches at least 50%, with up to 75% of the relevant contract value being eligible for billing; and 2) After the work has been fully completed and has been subject to a joint inspection, as completed by the Toll Road Business Entity (*Badan Usaha Jalan Tol* – “BUJT”) and the relevant entitled party (*Pihak Yang Berhak* – “PyB”).
- For a first-stage claim that is submitted prior to completion of relevant work, the following documents must be attached in addition to the meeting of certain general requirements: 1) A formal request from the land procurement commitment officer must be made to the BUJT regarding the provision of a replacement building; 2) Documents that identify the business entity, including relevant details and the amount that is being claimed; 3) The relevant work contract; 4) A work progress report that covers the claimed progress of the project, as signed by the supervising consultant, contractor and BUJT; 5) The relevant S-curve work progress chart; and 6) Statement of Absolute Responsibility, as signed by the BUJT.
- Meanwhile, in terms of any remaining claims that are submitted after a replacement building has been fully constructed, the required supporting documents include: 1) Complete evidence of all expenses incurred by the BUJT for the provision of the replacement building; and 2) Official joint inspection report of the completed works, as signed by the BUJT and the PyB.

Land & Property

32. Regulation of the Public Housing Savings Management Agency No. 3 of 2025 on the Management of the Public Housing Savings Funds Sourced from Waqf Funds

Enforcement Date: 31 October 2025

Summary:

- In essence, public housing savings (*Tabungan Perumahan Rakyat* - “**Tapera**”) funds that derive from *waqf* funds will be managed separately from other Tapera Funds. In this regard, said *waqf* funds should be cooperatively managed by the Tapera Management Agency (*Badan Pengelola Tapera* – “**BP Tapera**”) and the relevant *Nazhir* (i.e. the party that receives *waqf* property from *wakif* to be managed and developed in accordance with its intended purpose). The *Nazhir* should take the form of a legal entity that is registered with the Indonesian *Waqf* Board.
- The aforementioned cooperatively managed *waqf* funds should be set out in cooperation agreements that should address the following aspects at the least: 1) Rights and obligations of the relevant parties; 2) Terms of the agreement; 3) Dispute resolution mechanism; and 4) Termination-of-cooperation mechanism. It should be noted that a *Nazhir* must first secure an approval from the Indonesian *Waqf* Board prior to the signing of any such cooperation agreement.
- This Regulation also affirms that when administering any *waqf* funds, BP Tapera may be assisted by a custodian bank (i.e. a sharia bank that provides custodian services) that has been appointed by the relevant *Nazhir*. Moreover, the management of *waqf* funds by BP Tapera, as the partner of the *Nazhir*, should encompass the following activities: 1) Collection of the *waqf* funds; 2) Management of the *waqf* funds; and 3) Use of net returns from the management of the *waqf* funds.
- It should also be noted that managers of *waqf* funds should aim to increase their value. In this regard, it should be noted that this Regulation affirms that the principal value of any *waqf* funds cannot be reduced. Furthermore, the results of *waqf* fund management may be utilized for a number of purposes (e.g. operational costs, rights of the *Nazhir* and *Nazhir* partners, guarantee reserve funds and so forth), while 10% of the net proceeds from any *waqf* funds should be allocated to the *Nazhir* and *Nazhir* partners.

Manufacturing & Industry

33. Decree of the Minister of Industry No. 4607 of 2025 on Guidelines for the Production of Recycled Polyethylene Terephthalate Resin for Food Packaging

Enforcement Date: 8 October 2025

Summary:

- This Decree outlines a comprehensive set of guidelines (“**Guidelines**”) for the production of polyethylene terephthalate (“**PET**”) resin that derives from the recycling of used PET plastic products that meet safety requirements for use as food packaging (“**Recycled PET Resin**”). The guidelines specifically address the following aspects: 1) Scope; 2) Definitions; 3) Product safety systems; 4) Production environments and facilities; 5) Product and machinery controls; 6) Personnel; and 7) Distribution controls. The Guidelines should be used as a reference during the production of Recycled PET Resin that meets the applicable quality requirements in accordance with the Indonesian National Standard (*Standar Nasional Indonesia/SNI*) 8424:2023 on PET, as well as relevant Laws.
- The Decree further states that product safety systems should be covered by documented and communicated safety policies that are supported by clear and accessible procedures, defined material and product specifications, supplier evaluations, traceability, product coding, recall procedures and periodic internal audits.
- The Decree also stipulates that all production environments and facilities must prevent contamination, be regularly reviewed and be kept clean. Said production environments include factory conditions, building layouts, equipment suitability, laboratory availability, maintenance, employee facilities, hygiene and sanitation, waste handling and utilities. Meanwhile, product and machinery controls include product design and process development, material and process controls, inspections, monitoring and calibration, handling of nonconforming products, and contamination and allergen management.

Monetary & Payment System

34.Regulation of the Bank Indonesia Board of Governors No. 18 of 2025 on Criteria and Requirements for Securities and the Use of Securities During Monetary Operations

Enforcement Date: 20 October 2025

Summary:

- Bank Indonesia (“**BI**”) has issued a new framework that expands the list of eligible issuers of securities during Monetary Operations (*Operasi Moneter* – “**OM**”) through the addition of government-established financial institutions (*Lembaga Jasa Keuangan* – “**LJK**”) that support public welfare programs. Said LJK will now sit alongside the previously recognized

categories of issuers (i.e. BI, the Republic of Indonesia and foreign governments). This new Regulation also introduces various distinct eligibility criteria for each category of issuer, replacing the earlier classifications that were based solely on currency denominations. In addition, foreign government issuers have been excluded from sharia-based OM transactions, while all securities must comply with sharia principles.

- This new framework has also expanded the various types of securities that are eligible for OM, retaining most of the previously recognized instruments while introducing several new types of securities, such as BI Floating Rate Notes (“**BI-FRN**”) and securities that are issued by LJK. It should be noted that all securities that are issued by LJK, specifically those that are used in these types of transactions, must have a minimum remaining maturity of five business days at the time of their second leg.
- Ultimately, this new Regulation retains the existing pricing methods that apply to BI instruments while also introducing specific BI-FRN pricing of 100% of face value, as well as market-based pricing for sovereign bonds and LJK-issued securities. This framework has also removed the fixed haircut percentages that previously applied to BI securities, giving BI the authority to determine and adjust haircuts as required. The Regulation has also expanded BI’s authority to conduct early BI-FRN redemptions in various circumstances, such as failed second leg settlements and early terminations.

35.Regulation of the Bank Indonesia Board of Governors No. 19 of 2025 on Infrastructure and Participation in Monetary Operations

Enforcement Date: 1 December 2025

Summary:

- In essence, Bank Indonesia (“**BI**”) is authorized to determine the necessary infrastructure that can be utilized by participants in monetary operations and intermediary agencies. Said infrastructure includes: 1) Facilities used during monetary operation transactions; 2) Facilities for the administration of BI securities; and 3) Supporting infrastructure for the implementation of monetary operation transactions.
- The supporting infrastructure outlined in point (3) above refers to the direct, real-time system that is used to monitor foreign exchange transactions against the rupiah (*Sistem Monitoring Transaksi Valuta Asing terhadap Rupiah* - “**SISMONTAVAR**”). SISMONTAVAR should be utilized to facilitate the following types of foreign exchange transactions against the rupiah: 1) Transactions between banks that are carried out through the foreign exchange transaction system; and 2) Transactions between banks and customers, specifically spot transactions valued at a minimum of US\$ 250,000 and/or derivative transactions valued at a minimum of US\$ 1 million.

- In this regard, any banks that engage in the aforementioned foreign exchange transactions against the rupiah must connect any foreign exchange transaction systems and/or foreign exchange transaction support systems that they use to facilitate transactions with SISMONTAVAR. Any banks that fail to comply with this connection mandate may be subject to the imposition of administrative sanctions.

36.Regulation of the Bank Indonesia Board of Governors No. 20 of 2025 on Rupiah Monetary Operations

Enforcement Date: 20 October 2025

Summary:

- Broadly speaking, this Regulation affirms that the enforced implementation of monetary policy by Bank Indonesia (“**BI**”) in order to ensure monetary controls through monetary operation transactions that are undertaken in the rupiah currency (“**Rupiah Monetary Operations**”), including both conventional and sharia-based transactions, encompasses the following transaction classifications: 1) Rupiah Open Market Operations (*Operasi Pasar Terbuka* – “**OPT**”); and 2) Activities that involve the provision of rupiah funds by BI to banks and the deposit of rupiah funds by banks with BI for the purpose of monetary operations (“**Standing Facilities**”).
- In terms of Rupiah OPT, this Regulation affirms that this type of monetary operation should be implemented either through BI and/or the market (i.e. transactions that are undertaken between BI and monetary operation participants acting as main dealers, and other parties). BI will organize Rupiah OPT through auction and/or non-auction mechanisms. In terms of Rupiah OPT that are organized through the auction mechanism, this Regulation also affirms that all such auctions should be implemented through either the fixed rate tender or variable rate tender methods.
- Meanwhile, this Regulation clarifies that Standing Facilities should be implemented by BI in order to inject and absorb rupiah liquidity into/from the money market. Standing Facilities should be bilaterally organized through a non-auction mechanism and should involve direct participation from all monetary operation participants. Furthermore, this new framework affirms that Standing Facilities may take the following forms: 1) Conventional Standing Facilities: lending and deposit facilities; and 2) Sharia Standing Facilities: financial facilities and the BI Sharia Deposit Facility (*Fasilitas Simpanan Bank Indonesia Syariah*/FASBIS).

37.Regulation of the Bank Indonesia Board of Governors No. 21 of 2025 on Foreign Exchange Monetary Operations

Enforcement Date: 20 October 2025

Summary:

- In essence, the enforcement of monetary policy by Bank Indonesia (“BI”), specifically monetary controls over monetary operation transactions that are conducted in foreign exchange (“**Foreign Exchange Monetary Operations**”), will be implemented either through BI and/or the market (i.e. transactions between BI and participants in monetary operations that act as main dealers, agent banks, appointed cross-currency dealers and other parties).
- Foreign Exchange Monetary Operations will be organized through the auction mechanism (in line with the fixed rate tender or variable rate tender methods) and/or through the non-auction (bilateral) mechanism. In this regard, this Regulation affirms that any monetary operation participants may participate in Foreign Exchange Monetary Operation transactions (either directly or indirectly via an intermediary agency).
- This Regulation also authorizes BI to issue the following types of securities in order to support the overall stability of the rupiah exchange rate: 1) BI Foreign Exchange Securities (*Surat Berharga Bank Indonesia dalam Valuta Asing* - “**SBBI Valas**”); 2) BI Foreign Exchange Securities Instruments (*Sekuritas Valuta Asing Bank Indonesia* - “**SVBI**”); and 3) BI Foreign Exchange Sukuk (*Sekuritas Valuta Asing Bank Indonesia* - “**SUVBI**”). In addition to these types of securities having to comply with certain criteria, this Regulation also affirms that BI is authorized to reissue SBBI Valas, SVBI and SUVBI (through the addition of nominal value to previously issued series of recorded securities).

Natural Resources

38. Regulation of the Minister of Forestry No. 20 of 2025 on the Amendment to Regulation of the Minister of Environment and Forestry No. 7 of 2021 on Forestry Planning, Changes to the Designations and Functions of Forest Areas, and Uses of Forest Areas

Enforcement Date: 6 November 2025

Summary:

- Following the introduction of reacquisition (*penguasaan kembali*) measures, which form part of the administrative sanctions that can be imposed upon palm-oil plantation businesses that have been established within forest areas but for which relevant forestry permits have not been secured in line with Regulation of the Government No. 45 of 2025, this Regulation clarifies that the aforementioned reacquisitions will be implemented through a forest area release mechanism for forest areas that involves the handing over of

said areas to State-Owned Enterprises (*Badan Usaha Milik Negara* – “**BUMN**”) or the State-Owned Enterprises Regulatory Agency (*Badan Pengaturan BUMN* – “**BP BUMN**”). Any releases of forest areas will ultimately result in the redesignation of the following two types of forest areas as non-forest areas: 1) Convertible Production Forest (*Hutan Produksi yang dapat Dikonversi/HPK*) areas; and/or 2) Permanent Production Forest areas.

- The aforementioned releases of forest areas will be carried out based on successful approval applications that are submitted to the Minister of Forestry (“**Minister**”). Meanwhile, the leaderships of BP BUMN or BUMN will be appointed to manage any palm-oil businesses that result from such reacquisition measures. The aforementioned approval applications should be submitted along with statement letters affirming that a wide scope of commitments will be met once the relevant forest area release approvals have been secured. Relevant documents that prove the fulfillment of various administrative and technical requirements should also be submitted along with the aforementioned applications.
- Once a Forest Area Release Approval has been secured, then the relevant approval holder will be required to fulfill the above-mentioned commitments within a timeframe of one year from the relevant date of approval issuance. Approval holders are also required to submit reports that address the complete fulfillment of their commitments to the Minister through the Director-General of Forestry Planning. Ultimately, holders of Decrees of the Minister that officially stipulate the boundaries of any released forest areas that result from reacquisition measures must comply with the following requirements: 1) Must identify and designate areas of high conservation value; 2) Must not engage in any burning when clearing land; and 3) Must fulfil various other obligations in line with applicable Laws and Regulations.

39.Regulation of the Minister of Finance No. 77 of 2025 on the Management of State Property Originating from Coal Mining Cooperation/Work Agreements

Enforcement Date: 19 November 2025

Summary:

- This new framework has now updated the various roles and responsibilities of parties that manage State-Owned Assets (*Barang Milik Negara* – “**BMN**”) that originate from Coal Mining Cooperation/Work Agreements (*Perjanjian Kerja Sama Karya Pengusahaan Pertambangan Batubara* – “**PKP2B**”), particularly contractors and holders of special mining business permits (*Izin Usaha Pertambangan Khusus* – “**IUPK**”) as a Continuation of Operations (“**IUPK Holders**”). These parties are now required to carry out additional follow-up actions in relation to asset utilization and destruction approvals. Meanwhile, clearer rules have now been introduced that address the measures that should be taken if assets are lost due to negligence, misuse or violations that lead to the loss of BMN PKP2B. In such cases, contractors

and/or IUPK Holders must replace the assets in question based on their original cost or appraised value, or provide another asset with similar specifications.

- Furthermore, this new Regulation maintains the assets criteria from the previous framework but clarifies that assets may only become state property if they continue to have economic value. Moreover, the various categories of assets that can be classified as BMN PKP2B have been expanded and now include inventories, constructions in progress, intangible assets and various other types of fixed assets.
- This new Regulation also clarifies that BMN PKP2B utilization now covers utilization by contractors/IUPK Holders and certain government officials, as well as the replacement of BMN PKP2B, each with its own set of updated procedures. In addition, a new “benefit value” now applies in situations where IUPK Holders utilize BMN and requires formal utilization agreements to be drawn up by Officials. Finally, the new framework also requires asset user approvals to be secured for acts of destruction and introduces new rules on asset transfers, including sales under Rp. 100 million and the disposal of residual operational waste.

40. Regulation of the Minister of Industry No. 38 of 2025 on Indonesian Sustainable Palm Oil Certification for the Downstream Palm Oil Industry

Enforcement Date: 12 May 2026

Summary:

- Under this new framework, companies operating within the downstream palm oil industry through risk-based business licenses for the industrial sector and in line with the Indonesian Business Field Classification (*Klasifikasi Baku Lapangan Usaha Indonesia* – “**KBLI**”) for the Downstream Palm Oil Industry must comply with the obligation to implement Indonesian Sustainable Palm Oil (“**ISPO**”) Certification (“**Certification**”). Moreover, the Regulation has also clarified that the aforementioned Certification must be implemented through the application of the principles of compliance with applicable law, traceability and sustainable business enhancement.
- Certification will be administered by official ISPO Certification Agencies (*Lembaga Sertifikasi* – “**LS**”) that have already secured a National Industrial Information System (*Sistem Informasi Industri Nasional* – “**SIINas**”) account and that offer accredited testing laboratories that operate within the scope of the downstream palm oil industry. Broadly speaking, downstream palm oil industry companies should submit Certification applications electronically through the ISPO information system in line with the following stages: 1) Input relevant data through the completion of the provided form; 2) Selection of the LS ISPO that will perform the conformity assessment; 3) Upload the relevant ISPO certification for plantation business activities or from raw material suppliers; and 4) Upload the required documents, which include a copy of the relevant company’s deed of establishment and any

amendments, as well as a certificate or self-declaration of the implementation of an ISO 9001 quality management system and/or ISO 22000 food safety management system.

- Under this new framework, companies are required to submit Certification applications for each production location, as each single Certification application only has applicability at one single production location. Moreover, each ISPO certificate will have a validity of five years, while a renewal application must be submitted whenever a certificate expires. Said renewals may be conducted through processes of recertification.

41. Decree of the Minister of Agriculture No. 1117/KPTS./SR.310/M/10/2025 on the Amendment to Decree of the Minister of Agriculture No. 800/KPTS./SR.310/M/09/2025 on the Types, Maximum Retail Prices and Allocation of Subsidized Fertilizers for the Agricultural Sector for the 2025 Fiscal Year

Enforcement Date: 22 October 2025

Summary:

- This Decree sets various types and maximum retail prices (*Harga Eceran Tertinggi* – “HET”) for subsidized fertilizers within the agricultural sector for the 2025 fiscal year. The established HET include: 1) Urea fertilizer: Rp. 1,800/kg; 2) NPK fertilizer: Rp. 1,840/kg; 3) NPK fertilizer, specifically for cocoa: Rp. 2,640/kg; 4) ZA fertilizer: Rp. 1,360/kg; and 5) Organic fertilizer: Rp. 640/kg.
- It should be noted that any fertilizers that were in the middle of being distributed as of 22 October 2025 are also subject to the new HET. Moreover, any subsidized fertilizers that are in the process of being distributed by state-owned enterprises (*Badan Usaha Milik Negara* – “BUMN”) through distributors or recipients via official delivery points but that have not yet been collected by farmers must comply with the new HET provisions.
- In addition, any differences in redemption values that result from the HET adjustment will be made up by the relevant BUMN and either refunded or offset against purchases of subsidized fertilizers by distributors or recipients through official delivery points during the following period.

42. Decree of the Minister of Marine Affairs and Fisheries No. 65 of 2025 on the Amendment to Decree of the Minister of Marine Affairs and Fisheries No. 65 of 2024 on the Committee for Work Competency Standards Within the Maritime and Fisheries Sector

Enforcement Date: 24 October 2025

Summary:

- This Amendment revises the entire Appendix to the document that was originally set out under Decree of the Minister of Marine Affairs and Fisheries No. 65 of 2024 and has now incorporated the Director-General of Marine Spatial Planning as a member of the steering committee. Meanwhile, a number of changes have also been introduced to the composition of the committee responsible for the development of work competency standards within the maritime and fisheries sector.

Non-Banking Financial Services

43. Regulation of the Financial Services Authority No. 25 of 2025 on the Amendment to Regulation of the Financial Services Authority No. 49 of 2024 on the Supervision, Determination of Supervision Status and Follow-up Supervision of Financing Institutions, Venture Capital Companies, Microfinance Institutions and Other Financial Services Institutions

Enforcement Date: 10 November 2025

Summary:

- By taking account of the fact that the ongoing economic slowdown that is taking place across the country is ultimately affecting the ability of debtors to repay their loans, as well as the equity-to-paid-up capital ratio, this Amendment officially affirms that the following criteria that are used to determine supervision levels, as originally set out under the framework of Regulation of the Financial Services Authority No. 49 of 2024, will remain in force until 31 December 2027: 1) Soundness level; 2) Quantitative parameter in the form of the equity-to-paid-up capital ratio; and 3) Quantitative parameter in the form of the net non-performing financing receivables ratio.

44. Circular of the Financial Services Authority No. 21/SEOJK.07/2025 on Fit-and-Proper Assessments and Re-Assessments of Main Parties Within the Financial Technology Innovation Sector, as Well as Digital Financial Assets and Crypto Assets

Enforcement Date: 1 October 2025

Summary:

- This Circular sets out various criteria relating to the integrity, financial reputations, financial soundness and professional competence of main

parties. Prospective main parties are required to have no specified criminal records within the designated period, comply with applicable Laws, maintain the confidentiality of all consumer data and draw up business development plans, including medium-term capital strategies.

- The Circular further strengthens governance across Financial Technology Innovation Providers (*Inovasi Teknologi Sektor Keuangan/ITSK*) and within the digital-asset sector through clearer risk-based assessment mechanisms. These mechanisms limit the exercise of control rights prior to the granting of approvals and explicitly define the various activities that constitute control or management functions. The goal here is to ensure that only individuals who meet the required standards relating to integrity, financial capability and professional competence are eligible to serve as controllers or managers within these sectors.

45. Circular of the Financial Services Authority No. 23/SEOJK.06/2025 on the Amendment to Circular of the Financial Services Authority No. 25/SEOJK.05/2019 on Monthly Reporting by Venture Capital Companies and Sharia Venture Capital Companies

Enforcement Date: 1 April 2027

Summary:

- The Amendment reaffirms that monthly reports ("**Reports**") should be drawn up by Venture Capital Companies and Sharia Venture Capital Companies (collectively referred to as *Perusahaan Modal Ventura* - "**PMV**") before being submitted online through the Data Communications Network System ("**System**") organized by the Financial Services Authority (*Otoritas Jasa Keuangan* – "**OJK**"). Compilers of reports are required to secure access to the System by submitting applications along with user email addresses that have been designated by their boards of directors ("**BoD**"). In addition, BoD are also required to submit applications whenever there is a change in a company's registered email address.
- In the event of any technical disruptions or if the System becomes unavailable, then the Amendment allows PMV to submit their Reports electronically via the OJK's designated email address (i.e. mailingroommrp@ojk.go.id). If this designated email address is also experiencing disruptions, then PMV may still submit their Reports offline via electronic documents stored on data media, which should be delivered to the OJK along with a letter that has been signed by the relevant BoD.
- The Amendment retains the requirement for Reports to comprise two parts: company profile reports and financial reports. However, the Amendment has now revised several elements of company profile reports and has extended their applicability to Sharia Business Units (*Unit Usaha Syariah/UUS*). One key addition includes the requirement to report the details of the relevant collection personnel. Said details will now complement existing reported information, such as information on the

relevant company and its management and shareholders, as well as employee data.

Pharmacies, Health Industry, and Foods & Drugs Standards

46.Regulation of the Coordinating-Minister for Food Affairs No. 2 of 2025 on Guidelines for the Implementation of the Food Commodity Balance

Enforcement Date: 29 October 2025

Summary:

- In essence, this Regulation will now serve as a set of guidelines for the use of data and information that address the consumption and production situation of various food commodities and/or the needs of the population, as well as industrial requirements within certain timeframes (“**Food Commodity Balance**”). This new framework sets out a total of 17 activities that specifically relate to the implementation of the Food Commodity Balance. Details of these activities are comprehensively outlined under the Appendix to this Regulation.
- The above-mentioned guidelines should be used as a reference by various stakeholders and governmental ministries/agencies operating within the food sector. In terms of businesses operating within the food sector specifically, these guidelines should serve as reference for the drafting and submission of the following documents: 1) Food commodity requirement plan proposals that address for the needs of the population, as well as industrial requirements; 2) Applications for import or export approvals for food commodities; and 3) Applications for the securing of permits for import and export activities and documents affirming the fulfillment of prohibitions or restrictions on imports and exports of goods other than those related to import or export approvals for food commodities.

47.Regulation of the Minister of Health No. 11 of 2025 on Business Activity Standards and/or Product/Service Standards and the Organization of Risk-Based Business Licensing Within the Healthcare Subsector

Enforcement Date: 3 October 2025

Summary:

- The enforcement of this new framework has resulted in the repeal and replacement of Regulation of the Minister of Health (“**Minister**”) No. 14 of 2021, as amended by Regulation of the Minister No. 17 of 2024 (collectively referred to as “**Regulation 14/2021**”), which set out the previously applicable standards for business activities and products/services within the healthcare sector.
- In essence, this Regulation affirms that any business actors operating within the healthcare subsector are required to secure and comply with various Business Licenses (*Perizinan Berusaha* – “**PB**”) and Business Licenses to Support Business Activities (*Perizinan Berusaha untuk Menunjang Kegiatan Usaha* – “**PB UMKU**”) that apply within this sector.
- The list of PB applicable within the healthcare subsector now breaks down as follows: 1) Healthcare services; 2) Pharmaceuticals, medical devices and household health supplies; and 3) Vector control and disease-carrying animals. While the available PB UMKU bear substantial similarities to the aforementioned list of PB, this Regulation does not feature any specific PB UMKU for vector control and disease-carrying animals.
- This Regulation affirms that business actors that are obliged to secure the aforementioned PB must first fulfill several fundamental requirements (*persyaratan dasar*), ranging from the securing of environmental approvals to spatial utilization conformity. In terms of the securing of relevant permits, this Regulation also affirms that businesses are required to have secured PB UMKU for the healthcare subsector, possession of which is mandatory during the operational and/or commercial stages of all business activities.
- It should be noted that any businesses that violate the requirement to secure PB and/or PB UMKU for the healthcare subsector will be subject to the imposition of administrative sanctions ranging from reprimands and temporary suspensions of business activities to administrative fines and the revocation of issued PB and/or PB UMKU.

48.Regulation of the Minister of Health No. 13 of 2025 on the Management of Human Healthcare Resources

Enforcement Date: 3 November 2025

Summary:

- In essence, this Regulation replaces a total of 61 regulatory frameworks of the Minister of Health and the Indonesian Medical Council and consolidates them under a single framework that will now govern the overall management of human healthcare resources (“**Human Resources**”).
- The above-mentioned Human Resources comprise doctors and dentists (collectively referred to as “**Medical Professionals**”), healthcare professionals and other supporting healthcare workers. Meanwhile, the management of these Human Resources broadly comprises the following elements: 1) Planning; 2) Procurement; 3) Utilization; 4) Quality improvement; and 5) Welfare fulfillment.

- This Regulation affirms that Medical Professionals and healthcare professionals are entitled to enjoy legal protection, provided that said professionals perform their duties in accordance with the applicable professional standards, professional service standards, standard operating procedures, professional codes of ethics and the health requirements of patients. These legal protections break down as follows: 1) Legal protections aimed at preventing Medical Professionals and Human Resources from committing any violations; and 2) Legal protection for Medical Professionals and Human Resources who are facing legal issues.
- It should also be noted that this Regulation features a series of provisions that address the prevention and handling of any bullying (*perundungan*) that may be perpetrated by Medical Professionals/Human Resources. In this regard, the leaderships of healthcare service facilities are required to ensure that efforts are made to prevent bullying within their facilities through engagement in several initiatives, including: 1) Development of guidelines and standard operating procedures aimed at the prevention and handling of bullying within healthcare service facilities; 2) Establishment of a team aimed at the prevention and handling of bullying within healthcare service facilities; 3) Provision of an internal complaints channel through which bullying can be reported; 4) Implementation of communication, information and education-related activities aimed at the prevention and handling of bullying within healthcare facilities; and 5) Oversight of educational and service processes.

49. Circular of the Minister of Health No. HK.02.02/MENKES/936/2025 on the National Trial of the Indonesian Diagnosis-Related Group (iDRG) at Advanced Healthcare Facilities Cooperating with the Social Security Agency for Health

Enforcement Date: 30 September 2025

Summary:

- This Circular affirms that the national trial of the Indonesian Diagnosis-Related Group (“**iDRG**”), which is a patient-care classification system that is based on clinical similarities and the comparable use of healthcare resources within a single Diagnosis-Related Group (DRG), has been implemented at Advanced Healthcare Facilities (*Fasilitas Pelayanan Kesehatan Tingkat Lanjut* - “**FPKTL**”) across the nation in cooperation with the Social Security Agency for Health (*Badan Penyelenggara Jaminan Sosial Kesehatan*/BPJS Kesehatan) since October 2025.
- In terms of the national iDRG trial, this Circular affirms that FPKTL are required to implement the following activities: 1) Participate in the dissemination of the national iDRG trial; 2) Complete the national iDRG trial forms and study relevant materials and supporting data, which can be accessed via the following official website of the Ministry of Health: <https://s.kemkes.go.id/ujicobaiDRG2025>; 3) Prepare the required

human resources and information systems that will be used during the national iDRG trial; and 4) Take part in the national iDRG trial.

- It should be noted during the iDRG trial, as outlined in point (4) above, FPKTL should comply with several mechanisms, including: 1) Adjust their information systems based on the integration status of the Hospital Management Information System (*Sistem Informasi Manajemen Rumah Sakit/SIMRS*); 2) Implement the iDRG coding guidelines, as set out under the draft Indonesian Coding Standard (ICS); 3) Implement the 2010 version of ICD-10, as featured under the draft additional codes of the ICD-10 Indonesian Modification (IM); and 4) Ensure that claim amounts continue to refer to the Indonesian Case Base Groups (INA-CBG) tariffs, pursuant to Regulation of the Minister of Health No. 3 of 2023.

50. Regulation of the National Agency of Food and Drug Control No. 30 of 2025 on the Amendment to Regulation of the National Agency of Food and Drug Control No. 14 of 2024 on Supervision of the Online Distribution of Food and Drug Products

Enforcement Date: 3 November 2025

Summary:

- This Amendment revises the online distribution framework so that it now exempts deliveries of medicines, traditional medicines, quasi drugs, health supplements, processed foods or processed foods for special medical purposes (collectively referred to as “**Products**”) when said deliveries are conducted through electronic systems that are utilized directly, are limited in access and are intended solely for internal requirements within healthcare facilities in order to support their healthcare services. This exception did not previously feature under the framework of Regulation of the National Agency of Food and Drug Control No. 14 of 2024. In addition, the Amendment mandates that any products that are made available online must comply with all of the applicable safety, efficacy, quality, labeling and advertising standards.
- The Amendment also clarifies that the imposition of administrative sanctions does not replace the authority to impose criminal sanctions in accordance with applicable Laws and Regulations.

51. Regulation of the Halal Product Guarantee Agency No. 5 of 2025 on Halal Certification Criteria for Micro- and Small-Scale Enterprises, Halal Declarations and Procedures for Halal Product Process Assistance

Enforcement Date: 12 November 2025

Summary:

- In essence, this Regulation affirms that the obligation for micro- and small-scale enterprises (“**MSE**”) to secure halal certification involves mandatory halal declarations, which should adhere to standards established by the Halal Product Guarantee Agency (*Badan Penyelenggara Jaminan Produk Halal* – “**BPJPH**”). The aforementioned halal standards should address the following aspects at the very least: 1) Declaration from the business actor in the form of an agreement/oath confirming the halal status of the relevant products and materials used and the Halal Product Process (*Proses Produk Halal* – “**PPH**”); and 2) The presence of PPH assistance.
- MSE will be deemed eligible to submit halal certification applications via halal declarations if they meet the following criteria in accordance with provisions set out under relevant Laws and Regulations: 1) Must operate a productive business with certain net assets or annual sales revenues; and 2) Must have secured a business identification number or other risk-based business licensing documents.
- In addition to the above-listed criteria, MSE products should also meet the following criteria: 1) Products must be low-risk or use ingredients whose halal status has been confirmed (e.g. halal certification must have been secured or the relevant ingredients must have been exempted from the obligation to be halal-certified); and 2) Must be manufactured through simple production processes whose halal status is guaranteed (e.g. shared production house, home-based business production or other production site that is not a factory and that utilizes simple methods in order to preserve products).

52. Decree of the Director-General of Advanced Health Services No. HK.02.02/D/4072/2025 of 2025 on the Management of Complaints Regarding the Quality of Healthcare Services Offered by Advanced Healthcare Facilities

Enforcement Date: 30 September 2025

Summary:

- This Decree establishes a set of complaints handling procedures that specifically relate to patient satisfaction, incidents involving patient safety and other service quality issues that occur at advanced healthcare facilities (*Fasilitas Pelayanan Kesehatan Tingkat Lanjut* – “**FPKTL**”), which include hospitals, main clinics, blood service units and medical laboratories. The complaints handling mechanism classifies cases into two specific categories, i.e. complaints relating to patient satisfaction and complaints relating to patient safety incidents, each with its own clearly defined scope. Complaints in both categories must be resolved within a maximum timeframe of 45 business days.
- The complaints management procedure follows a structured sequence that commences with the receipt and verification of a complaint and concludes with a final follow-up and the archiving of all relevant records. Each stage of this procedure, from recording, review and confirmation to consolidation,

investigation and the preparation of recommendations, is associated with its own specific timeline requirements. The overall process also involves coordination with regional health offices and technical teams, as well as both online and offline investigations that aim to ensure thorough assessments.

- If an FPKTL is ultimately found to have committed a violation, then it may face the imposition of progressive administrative sanctions ranging from verbal and written warnings to fines, accreditation adjustments or even the revocation of its business permit, with progressively higher levels of sanctions being applied in response to repeat offenses or any failure to implement corrective actions. In severe cases, such as cases that involve death, permanent disability, organ damage or other sentinel events, the authorities may bypass the progressive imposition of sanctions and immediately impose higher-level sanctions.

53. Draft Regulation of the National Agency of Drug and Food Control on the Implementation of Pharmacovigilance

Enforcement Date: -

Summary:

- This Draft Regulation mandates that marketing authorization holders (*Pemilik Izin Edar* – “**Holders**”) should implement pharmacovigilance in order to ensure the safety of all circulating drugs. Implementation covers various aspects of drug safety, efficacy and quality, and applies to the following activities: 1) Drug use in accordance with marketing authorization, emergency use authorization and uses outside of those stated on approved labelling; 2) Misuse (*penyalahgunaan*); 3) Incorrect use (*penggunaan yang salah*); 4) Overdoses; 5) Medication errors; and/or 6) Ineffective medication.
- The Draft Regulation also establishes a standardized reporting protocol, including the classification of adverse events by their severity, and mandates training on pharmacovigilance practices for healthcare professionals. Specifically, Holders are required to submit reports on the following types of events to the Head of National Agency for Drug and Food Control (*Badan Pengawas Obat dan Makanan/BPOM*) via the National Pharmacovigilance/MESO Center: 1) Serious adverse events (*Kejadian Tidak Diinginkan* – “**KTD**”) or adverse drug reactions (*Efek Samping Obat* – “**ESO**”): must be reported within 15 calendar days from the date that any such information is received; 2) Serious Post-Immunisation Adverse Events (*Kejadian Ikutan Pasca Imunisasi* – “**KIPI**”): must be reported within 24 hours from the time that any such information is received (in cases that involve death) or within 15 calendar days (in cases that involve life-threatening conditions or hospitalization, or that lead to disability or public unrest); and 3) Non-serious, unexpected KTD/ESO/KIPI: must be reported within 90 calendar days from the date that any such information is received.
- In addition, Holders must also submit the following types of reports: 1) Periodic safety reports, for new drugs, biological products or drugs

associated with new safety issues: must be submitted every six months for the first two years, and annually for years three through five after the securing of marketing authorization; 2) Urgent safety signals: must be submitted within three business days of any such urgent safety signal being officially validated; and 3) Nihil reports: must be submitted if no KTD, ESO or KIPI reports are received within a given year. This type of report must be submitted by no later than 10th January of the following year.

54. Draft Regulation of the National Agency of Drug and Food Control on the Application of the Safety and Quality Assurance System for Processed Foods During Distribution

Enforcement Date: -

Summary:

- If ultimately enforced, this Draft Regulation is set to repeal and replace Regulation of the National Agency of Drug and Food Control (*Badan Pengawas Obat dan Makanan* – “**BPOM**”) No. 21 of 2021 on the Implementation of the Safety and Quality Assurance System for Processed-Foods at Distribution Facilities (“**Regulation 21/2021**”). The issuance, amendment and extension of Processed-Food Safety Management System (*Sistem Manajemen Keamanan Pangan Olahan* - “**SMKPO**”) certification will now be carried out via the Online Single Submission (“**OSS**”) system, which is electronically integrated into the BPOM system. However, applications for the issuance, amendment and extension of certification that are submitted by business actors that do not meet the applicable criteria must be carried out directly through the BPOM system instead of via the OSS.
- The Draft Regulation also revises the frequency of mandatory internal audits, which were previously required to be conducted on a six-monthly basis at least, to an annual basis. In this regard, holders of SMKPO certification are required to establish competent internal auditing teams responsible for the assessment of compliance with regulatory requirements, as well as for evaluations of the implementation of the Good Distribution Practices for Processed Foods (*Cara Peredaran Pangan Olahan yang Baik* - “**CPerPOB**”).
- While retaining the core mechanism for the issuance, amendment and extension of SMKPO certification that was previously set out under the framework of Regulation 21/2021, the Draft Regulation has now revised the various types of administrative sanctions that may be imposed upon violating business actors through the inclusion of the suspension of SMKPO certification processing and the closure of access to registrations and/or imports of processed foods. The Draft Regulation now also allows for SMKPO certificates to be revoked based on applications that are submitted by business actors to the Head of BPOM.

55. Draft Regulation of the National Agency of Food and Drug Control on Standards and/or Requirements to Ensure the Safety and Quality of Natural Medicines

Enforcement Date: -

Summary:

- While maintaining the obligation to apply Good Manufacturing Practices for Natural Ingredient Medicines (*Cara Pembuatan Obat Bahan Alam yang Baik* – “**CPOBAB**”) and to rely on the Indonesian herbal pharmacopoeia, as was previously the case under Regulation of the National Agency of Food and Drug Control (*Badan Pengawas Obat dan Makanan* – “**BPOM**”) No. 29 of 2023 on Safety and Quality Requirements for Natural Medicines (“**Regulation 29/2023**”), the Draft Regulation has now added a number of new provisions that specifically address the composition of ingredients, as well as restrictions on ingredients. Under these updates, ingredients are now categorized into active and added components, while the use of any active ingredients will be subject to limitations based on the results of safety, efficacy and quality assessments.
- Currently, Regulation 29/2023 states that qualitative and quantitative testing must be carried out by accredited laboratories and/or internal industry laboratories that have been recognized by BPOM. However, the Draft Regulation is set to expand this framework by specifying which laboratories may validate compliance with safety and quality requirements, permitting the use of accredited Indonesian laboratories, accredited laboratories from the relevant country of origin and/or internal business or industry laboratories acknowledged by BPOM, including Indonesian industry laboratories that have secured CPOBAB certification.
- In addition, the procedure for application submissions for assessments of requirements that have not yet been regulated remains largely unchanged from that set out under Regulation 29/2023. However, the Draft Regulation has now clarified that the types of business actors that can submit said applications do not include suppliers of natural ingredient medicine raw materials (*Bahan Obat Bahan Alam*).

56. Draft Regulation of the National Agency of Food and Drug Control on Criteria and Procedures for the Registration of Health Supplements

Enforcement Date: -

Summary:

- The Draft Regulation is set to comprehensively update the health supplement registration framework that is currently set out under Regulation of the National Agency of Food and Drug Control No. 32 of 2022, as subsequently amended by Regulation National Agency of Food and Drug Control No. 15 of 2024 (collectively referred to as “**Regulation 32/2022**”).

The Draft Regulation will update the applicable Good Manufacturing Practice standards so that they include: 1) Good Manufacturing Practices for Pharmaceuticals (*Cara Pembuatan Obat yang Baik/CPOB*); 2) Good Manufacturing Practices for Natural Ingredient Medicines (*Cara Pembuatan Obat Bahan Alam yang Baik/CPOBAB*); and/or 3) Good Manufacturing Practices for Processed Food Products (*Cara Produksi Pangan Olahan yang Baik/CPPOB*).

- Under the current framework of Regulation 32/2022, overseas contract manufacturing is permitted whenever the required technology is not available domestically or whenever production is centralized by a multinational company that also operates an industrial facility within Indonesia. Moreover, all imported materials or combinations must have established safety and benefit profiles, while any comparable products must have already been registered in Indonesia. The Draft Regulation also retains various requirements that specifically relate to unavailable domestic technologies and centralized production, and continues to require evidence of safety and benefits. However, the new framework is also set to remove the requirement for similar products to have already been registered in Indonesia.
- The Draft Regulation will also introduce a brand-new registration category (i.e. Export Registrations) in addition to the four existing categories. However, it should be noted that this new export category will be exempted from the mandatory pre-registration stage.

57. Draft Regulation of the National Agency of Food and Drug Control on Criteria and Procedures for the Registration of Quasi-Drugs

Enforcement Date: -

Summary:

- The Draft Regulation features a new set of comprehensive technical requirements for active ingredients, excipients and finished products. These include mandatory certificates of analysis, compliance with maximum excipient limits, documentation of sources for non-plant ingredients and stability testing in accordance with National Agency of Food and Drug Control (*Badan Pengawas Obat dan Makanan/BPOM*) guidelines. Finished products are also required to meet recognized pharmacopoeia standards and must be supported by results from accredited laboratories or manufacturers that have secured valid Good Manufacturing Practice (GMP) certification that covers Good Manufacturing Practices for Pharmaceuticals (*Cara Pembuatan Obat yang Baik/CPOB*), Good Manufacturing Practices for Natural Ingredient Medicines (*Cara Pembuatan Obat Bahan Alam yang Baik/CPOBAB*) or Good Manufacturing Practices for Cosmetics (*Cara Pembuatan Kosmetik yang Baik/CPKB*).
- The Draft Regulation will also reinforce the current registration framework by defining application types, new registrations, minor and major variations, and renewals, thereby clarifying which variations require notifications

versus formal approvals, and specifying assessment timelines (e.g. 85 working days for reviews of safety and efficacy dossiers). The new framework will also further govern contractual manufacturing arrangements, delineate the various responsibilities of license holders, principals, importers and contract manufacturers, and expand labeling requirements to include complete formulas, claims, warnings, registration numbers and other mandatory details.

Profession

58.Regulation of the Minister of Elementary and Secondary Education No. 21 of 2025 on Standards for Education Personnel Working in Early Childhood Education, Elementary Education and Secondary Education

Enforcement Date: 31 October 2025

Summary:

- This Regulation affirms that educators (i.e. educational personnel who participate in education-related work) must fulfill various standards that apply to educators. In this regard, the word “educator” covers seven professions, including: 1) Teachers; 2) Counselors; 3) Tutors; 4) Instructors; and 5) Facilitators.
- The aforementioned educator standards encompass the following elements: 1) Qualifications (i.e. the minimum academic qualifications that must be fulfilled by an educator, as proven through possession of relevant diplomas and competency certification); and 2) Competencies (e.g. pedagogical, personal, social and professional competencies).
- Meanwhile, non-educator workers within this field are also required to fulfill certain standards. Said non-educators are responsible for administration, management, development, supervision and technical services in support of the overall educational process, and may include the following professionals: 1) Heads of educational units; 2) Library staff; 3) Laboratory staff; and 4) Administrative staff; and 5) Other non-educator educational personnel (e.g. psychologists, social workers, therapists and so forth).

59.Regulation of the Minister of Law No. 34 of 2025 on Paralegals and the Provision of Legal Aid

Enforcement Date: 3 November 2025

Summary:

- While maintaining the three core services that can be provided by paralegals in line with their duties (e.g. advocating regional policies, participating in government programs and activities and/or cooperating with other parties in order to encourage or guide members of the general public to gain a deeper understanding of the law), this new Regulation now allows qualified paralegals to provide nine other types of non-litigation services. These nine services include: 1) Legal research and consultations; 2) Case investigations; 3) Mediation; 4) Negotiations; and/or 5) Drafting of legal documents.
- Under this new framework, the competence of paralegals will be proven through the securing of paralegal competency certification ("**Competency Certificates**"), as issued by organizations that provide legal aid services ("**Legal Aid Providers**") and signed by the National Law Development Agency (*Badan Pembinaan Hukum Nasional* – "**BPHN**") at the Ministry of Law. Said Competency Certificates will be signed at the same time as non-academic paralegal identities are granted. In this regard, Legal Aid Providers should submit their applications for the securing of said paralegal identities within 14 business days of the completion of their paralegal competency training.
- Although Legal Aid Providers are still required to draft and submit two types of reports to the BPHN upon the empowerment of paralegals (i.e. reports on legal aid training for paralegals and reports on the supervision and evaluation of the performances of paralegals), this Regulation now clarifies that supervision and evaluation reports should be submitted on a semesterly basis or whenever deemed necessary.

60. Regulation of the Minister of Law No. 37 of 2025 on Procedures for the Verification and Accreditation of Legal Aid Provider Organizations

Enforcement Date: 23 October 2025

Summary:

- While maintaining the six core phases of the verification and accreditation process for legal aid providers that were originally featured under the now-revoked Regulation of the Minister of Law and Human Rights No. 3 of 2013 ("**Regulation 3/2013**"), this new framework has now revised the requirements that must be met in order for an organization to become an official legal aid provider. These requirements include the following: 1) Must take the form of a legal entity; 2) Must employ an advocate and certified paralegals who are registered with legal aid institutions or community organizations; 3) Must employ administrators; 4) Must have established a legal aid program; and 5) Must have previously handled both litigation cases and non-litigation activities.
- While Regulation 3/2013 previously classified legal aid institutions into three main categories based on their annual performances (with criteria that included cases handled and non-litigation assistance provided), this

framework has now expanded this classification threshold to provider performances during the most recent three-year period.

Tax & Non-Tax Charges

61. Regulation of the Minister of Finance No. 72 of 2025 on the Amendment to Regulation of the Minister of Finance No. 10 of 2025 on Article-21 Income Tax on Certain Income Borne by the Government as Part of the 2025 Fiscal Year Economic Stimulus

Enforcement Date: 20 October 2025

Summary:

- This Amendment has now expanded the range of business sectors that are eligible to enjoy the Government-Borne (*ditanggung pemerintah* – “**DTP**”) Income Tax (*Pajak Penghasilan* – “**PPh**”) under Article 21 (“**Article-21 PPh DTP**”) incentive. Previously, this incentive was limited to employers operating within four specific industrial sectors (i.e. footwear, textiles and apparel, furniture, and leather and leather goods). However, this Amendment now includes tourism as a fifth sector eligible to enjoy this incentive.
- Additionally, the Amendment distinguishes between the applicable incentive period for each business sector. In this regard, whereas previously, all sectors were able to enjoy the incentive between January and December 2025, the Amendment only allows the original four above-listed industrial sectors to continue to receive the incentive for the full year of 2025. In contrast, the tourism sector has been granted this incentive for a shorter period, specifically from October to December 2025.
- The Amendment also introduces a special exception that is now available for the tourism sector regarding the treatment of overpayments of Article-21 PPh DTP. Previously, no Article-21 PPh DTP overpayments could be refunded or credited. However, employers operating within the tourism sector may now refund their permanent employees with regard to any overpayments. It should be noted, however, that this provision only applies to the portion of tax withholding that is not borne by the government.

62. Regulation of the Minister of Law No. 41 of 2025 on Procedures for the Payment of Non-Tax State Revenue for Intellectual Property Services at the Directorate-General of Intellectual Property

Enforcement Date: 23 October 2025

Summary:

- In essence, this Regulation affirms that payments of non-tax state revenue (*Penerimaan Negara Bukan Pajak* – “**PNBP**”) for services relating to intellectual property that are provided by the Directorate-General of Intellectual Property (“**Directorate-General**”) should be carried out through services or payment channels that are provided by the collecting agent on the same day that billing codes are issued. However, if a PNBP payment is not completed before this deadline, then relevant applicants will have their billing codes regenerated.
- The aforementioned services and payment channels will be made available through counters or tellers and/or through electronic systems. Moreover, any applicant who has settled their PNBP payment will receive a state receipt issued by the collecting agent.
- This Regulation affirms that applicants for intellectual property services are required to settle their PNBP payments by no later than their payment due dates in accordance with relevant Laws and Regulations. Moreover, in the event that PNBP receivables arise from intellectual property services, then the Director-General of Intellectual Property may delay the provision of said services by suspending access to the billing system, as managed by the Directorate-General.
- It should also be noted that any above-outlined PNBP that has already been paid or deposited may be refunded in certain circumstances, including: 1) There has been an error in the payment and/or collection of the PNBP; 2) A decision is issued by the head of the PNBP managing agency or an authorized PNBP management officer regarding a PNBP objection submission; 3) A legally-binding court decision is handed down; 4) The results of an official PNBP examination are issued by an auditing agency; and/or 5) Certain services cannot be fulfilled by the PNBP managing agency.

63. Regulation of the Director-General of Taxes No. PER-19/PJ/2025 on the Suspension of Access to Tax Invoice Issuance for Taxable Entrepreneurs Who Fail to Fulfill Their Obligations in Accordance with the Provisions of Laws and Regulations That Apply Within the Taxation Sector

Enforcement Date: 22 October 2025

Summary:

- In essence, the Director-General of Taxes (“**Director-General**”) is authorized to suspend access to tax invoice issuance for any taxable entrepreneurs who fail to comply with their obligations as taxpayers that meet certain criteria, including: 1) Failure to withhold or collect tax for each type of tax that should have been withheld or collected by a tax withholder or collector for three consecutive months; 2) Failure to submit an annual income-tax return for the relevant fiscal year; and/or 3) Having tax arrears

amounting to at least Rp. 250 million (for taxpayers registered with primary tax service offices) or Rp. 1 billion (for taxpayers registered with offices other than primary Tax Service Offices).

- Any taxpayer who is subject to the aforementioned tax invoice issuance suspension will be entitled to submit a written clarification to the head of the relevant Tax Service Office with which they are registered. This clarification should be accompanied by relevant supporting documents and should include the following information at the least: 1) The number and date of the relevant clarification letter or document; 2) The recipient of the relevant clarification letter or document, specifically the head of the Tax Service Office with which the taxpayer is registered; 3) The identity of the taxpayer, management and/or relevant person in charge; 4) Elucidation of the clarification; and 5) List of supporting documents that back up the clarification.
- If the head of the relevant Tax Service Office approves a clarification that is submitted by a taxpayer (or has not determined whether to either approve or reject the clarification within five business days of the clarification letter being received), then the relevant Tax Service Office will reopen the taxpayer's access to tax invoice issuance.

64. Regulation of the Director-General of Customs and Excise No. PER-17/BC/2025 on the Physical Form, Specifications and Design of Excise Stamps for 2026

Enforcement Date: 13 November 2025

Summary:

- Pursuant to this Regulation, excise stamps for use with tobacco products are required to be manufactured from paper that has certain security properties or contains certain elements and will take the following physical forms: 1) Series I comprises 120 pieces per sheet, with each piece measuring 1.2 cm x 11.7 cm; 2) Series II comprises 56 pieces per sheet, with each piece measuring 1.7 cm x 17.7 cm; 3) Series III without adhesive comprises 150 pieces per sheet, with each piece measuring 2.3 cm x 4.8 cm; and 4) Series III with adhesive comprises 60 pieces per sheet, with each piece measuring 1.9 cm x 7.4 cm.
- Meanwhile, for beverages containing ethyl alcohol, excise stamps are specified as being manufactured from paper that has certain security properties or contains certain elements and will take a physical form that comprises one series totaling 60 pieces per sheet, with each piece measuring 1.9 cm x 7.4 cm. The Regulation also stipulates that each excise stamp must contain a hologram with a width ranging from 0.6 cm - 0.7 cm, depending on the product type and/or series.
- Furthermore, the Regulation also stipulates the various elements that must at the least be incorporated into the designs of each excise stamp, as follows: 1) Indonesia's state emblem; 2) The emblem of the Directorate-General of Customs and Excise; 3) The relevant excise tariff; 4) The fiscal

year; and 5) The retail sales price and/or amount of content contained within the packaging. In addition to these elements, the Regulation also establishes various colors and specific wordings that must be incorporated into the designs of excise stamps, and also addresses the provision of excise stamps, as managed by the Director-General of Customs and Excise.

65. Decree of the Director-General of Customs and Excise No. KEP-208/BC/2025 on the Mandatory Implementation of Electronic Quota Deductions for Imports Covered by Import-Duty Exemption Facilities

Enforcement Date: 4 November 2025

Summary:

- This Decree officially mandates that the Customs and Excise Main Service Office, as well as Supervision and Service Offices, must fully implement mandatory electronic quota deductions. However, if any difficulties prevent the implementation of said electronic quota deductions, then a quota deduction may be executed manually in an integrated manner.
- The implementation of full electronic quota deductions should involve relevant service users. This Decree also affirms that electronic quota deductions may be implemented for goods that are declared through Goods Import Declaration (BC 2.0) documents via the CEISA 4.0 portal and that benefit the following import-duty exemption facility schemes: 1) Machinery, goods and materials that are used for industrial development or expansion purposes within the context of investment; 2) Capital goods that are used for industrial development or the expansion of electrical power generation capacity in the public interest; 3) Goods that are used in relation to upstream oil-and-gas business activities; and 4) Goods that are used in relation to geothermal operations.

Technology, Media, and Telecommunication

66. Draft Regulation of the Minister of Communication and Digital Affairs on the Registration of Telecommunications Service Customers Through the Mobile Cellular Network

Enforcement Date: -

Summary:

- Broadly speaking, this Draft Regulation governs procedures for the registration of telecommunications service customers (“**Customers**”), as well as for maintaining the data security of Customers, preventing the misuse of Customer numbers and various other matters relating to supervision and control. Under the Draft Regulation, telecommunications service providers (“**Providers**”) are required to implement the Know-Your-Customer (“**KYC**”) principle during the establishment of the following policies: 1) Customer registration policies; 2) Policies and procedures relating to the identification of correct and eligible Customers; and 3) Policies and procedures relating to risk management and the application of the KYC principle.
- Moreover, when working to maintain Customer data security, Providers are required to retain the data of all Customers who are still actively subscribed to their telecommunication services. Furthermore, all Customer data must be retained for a minimum period of three months for Customers who are no longer actively subscribed. Additionally, the Draft Regulation also requires Providers to keep their Customer data and/or identities confidential unless otherwise determined. In this regard, Providers must have secured at least ISO 27001 certification, which will be audited periodically and subsequently reported to the Director-General of Digital Ecosystem.
- It should also be noted that the Draft Regulation outlines various administrative sanctions that may be imposed upon Providers who fail to comply with the various obligations and prohibitions that are set out under the Draft Regulation. These sanctions will take the form of written reprimands and/or temporary suspensions of business activities.

Trade

67. Regulation of the Government No. 47 of 2025 on the Fourth Amendment to Regulation of the Government No. 46 of 2007 on the Batam Free-Trade Zone and Free Port

Enforcement Date: 28 October 2025

Summary:

- This Fourth Amendment has now expanded the official list of islands that fall under the scope of the Batam Free-Trade Zone and Free Port (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas* – “**KPBPB**”) to a total of 22 islands. These newly included islands include: 1) Tanjungsauh; 2) Ngenang; 3) Nirup; 4) Catur; and 5) Buntut Meriam. Details of the boundaries of the Batam KPBPB are comprehensively outlined under the Appendix to this Fourth Amendment.
- It should also be noted that any fundamental requirements, as well as business licenses and business licenses to support business activities that

have already been issued for the areas newly incorporated into the Batam KPBPB will remain valid. However, any permit applications that are currently ongoing will now be processed by the Batam KPBPB Development Authority.

68. Decree of the Minister of Finance No. 9/MK/BC/2025 on Goods Restricted for Import under Regulation of the Minister of Trade No. 19 of 2025 on Import Policy and Provisions for Salt and Fisheries Commodities, as Amended by Regulation of the Minister of Trade No. 38 of 2025 on the Amendment to Regulation of the Minister of Trade No. 19 of 2025 on Import Policy and Provisions for Salt and Fisheries Commodities

Enforcement Date: 5 November 2025

Summary:

- This Decree reaffirms the implementation of border-level supervision of import restrictions in accordance with Regulation of the Minister of Trade No. 19 of 2025 on Import Policy and Provisions for Salt and Fisheries Commodities, as amended by Regulation of the Minister of Trade No. 38 of 2025.
- Under the Appendix to this Decree, the government has also established various categories of goods that are now subject to import restrictions. These restrictions and the related supervisory measures also apply to the entry and exit of said goods to and from Free-Trade Zones and Free Ports (*Kawasan Perdagangan Bebas dan Pelabuhan Bebas/KPBPB*), Bonded Storage Areas (*Tempat Penimbunan Berikat/TPB*) and Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*).

69. Decree of the Minister of Finance No. 10/MK/BC/2025 on Goods Restricted for Import under Regulation of the Minister of Trade No. 16 of 2025 on Import Policy and Provisions, as Amended by Regulation of the Minister of Trade No. 37 of 2025 on the Amendment to Regulation of the Minister of Trade No. 16 of 2025 on Import Policy and Provisions

Enforcement Date: 5 November 2025

Summary:

- This Decree explicitly maintains the exemption to import restrictions that applies to investment-related imported goods, as originally stipulated under Attachment I, Part B, Point 3 of Regulation of the Minister of Trade No. 16 of 2025 (“**Regulation 16/2025**”). This exemption applies to import-restricted goods in a new condition, including: 1) Textiles and textile products, with

the exception of certain products (e.g. batik or batik-patterned textiles); 2) Electronics and telematics, with the exception of certain types of goods (e.g. cooling-system-based goods and electronics); 3) Goods for certain industries that are controlled under Ministerial Regulations on import policy and provisions; and 4) Consumer goods that are controlled under Ministerial Regulations on import policy and provisions.

- It is important to note that this exemption only applies to goods that were shipped before 5 November 2025, as evidenced by the dates stated on relevant Bills of Lading (B/L) or Air Waybills (AWB). In addition, goods must arrive at their designated ports by no later than 3 February 2026, as proven through manifest documents (BC 1.1).

70. Decree of the Minister of Finance No. 12/MK/BC/2025 on Determinations of the Types of Goods Units Used in Export Customs Notifications

Enforcement Date: 11 November 2025

Summary:

- This Decree establishes a set of standardized units of measurement (e.g. weight, volume, quantity) for goods that are listed in export customs notifications in line with the overall goal of enhancing the effectiveness of recording and supervision. This new Decree replaces the previous framework of Decree of the Minister of Finance No. 4/KM.4/2025.
- As detailed under the Appendix to this Decree, specific units are assigned to various commodities and are accompanied by associated Harmonized System (HS) codes and goods descriptions. These units should be utilized whenever reporting specific quantities of goods in export declarations, including releases of goods from Free Trade Zones, Special Economic Zones and Bonded Warehouses to areas that are located outside Indonesian customs territory.

71. Decree of the Minister of Finance No. 331 of 2025 on the Stipulation of the Public Service Agency of the Batam Free-Trade Zone and Free Port Development Authority as a Government Investment Operator

Enforcement Date: 10 November 2025

Summary:

- This Decree now officially designates the Public Service Agency of the Batam Free-Trade Zone and Free Port Development Authority (*Badan Layanan Umum Badan Pengusahaan Kawasan Perdagangan Bebas dan Pelabuhan Bebas Batam* - “**BLU BP Batam**”) as an official Government Investment Operator (*Operator Investasi Pemerintah* - “**OIP**”).

- As a designated OIP, BLU BP Batam is now authorized in relation to a wide array of functions and responsibilities, including: 1) Preparation of long-term, medium-term and annual plans on government investments; 2) Submission of investment proposals for government funding sourced from the State Revenue and Expenditure Budget to the Government Investment Committee (*Komite Investasi Pemerintah/KIP*); 3) Allocation of funds and/or financial assets for the implementation of government investments; 4) Divestments of government investments; and 5) Supervision of the implementation of government investments under its management.

Transportation and Logistic Services

72. Decree of the Minister of Transportation No. KM 50 of 2025 on the Reduced Fuel Surcharge for Economy Class Passenger Fares for Scheduled Domestic Commercial Flights During the 2025 Christmas Holiday and 2026 New Year Period

Enforcement Date: 8 October 2025

Summary:

- This Decree sets the permitted fuel surcharge that airlines may charge passengers, with differences in this surcharge being based on aircraft types as follows: 1) Jet aircraft: the maximum fuel surcharge has been set at 2% of the fare ceiling in accordance with each airline (*badan usaha angkutan udara*) service class; and 2) Propeller aircraft: the maximum fuel surcharge has been set at 20% of the ceiling fare in accordance with each airline service class.
- This temporary reduction in the fuel surcharge applies only to flights scheduled for dates between 22 December 2025 and 10 January 2026, with ticket booking dates between 22 October 2025 and 10 January 2026. After this period, the fuel surcharge will revert to its original rates, as set out under Decree of the Minister of Transportation No. KM 7 of 2023.

Miscellaneous

73. Regulation of the Minister of Law No. 36 of 2025 on the Legal Counselling System

Enforcement Date: 23 October 2025

Summary:

- In comparison with the now-revoked framework of Regulation of the Minister of Law and Human Rights No. M.01-PR.08.10 of 2006, as amended by Regulation of the Minister of Law and Human Rights No. M.01-PR.08.10 of 2007 (collectively referred to as “**Regulation 1/2006**”), this new Regulation now affirms that the governance of various activities that are associated with the dissemination of legal information and the understanding of legal norms (“**Legal Counselling**”) breaks down into the following phases: 1) Planning; 2) Implementation; 3) Monitoring and evaluation; and 4) Issuance of recommendation.
- While introducing no significant changes to the Legal Counselling methods that were originally featured under Regulation 1/2006 (i.e. direct or indirect counselling), this new framework has now revised the list of materials that should be disseminated via Legal Counselling as follows: 1) Draft Regulations; 2) Laws and Regulations; 3) Unwritten Laws; 4) International Laws; and 5) Court Decisions. Regulation 1/2006 previously only included Laws and Regulations as Legal Counselling materials.

74. Circular of the Minister of Law No. M.HA-01.HA.03.02 of 2025 on Assessments of Business and Human Rights Compliance by Business Actors

Enforcement Date: 25 August 2025

Summary:

- This Circular officially introduces an official application through which assessments of business and human rights risks (*Penilaian Risiko Bisnis dan Hak Asasi Manusia* - “**PRISMA**”) will be completed. In essence, this platform will now assist businesses to identify, prevent and mitigate any risks and negative impacts relating to human rights that may occur during their business operations, and will also serve as an initial step towards the implementation of effective and structured due diligence regarding human rights. The PRISMA app itself can be accessed through the following official website of the Ministry of Human Rights: prisma.kemenham.go.id.
- Business actors should complete annual self-assessments through the PRISMA app for two separate periods (January - March and July - August). Said assessments should be completed by official company representatives (e.g. company owners and/or individuals who are formally appointed to represent their companies) and broadly comprise 12 categories that relate to the application of human rights principles during business activities (e.g. human rights policies, work conditions, privacy, discrimination and so forth).
- The results of the above-outlined self-assessments will take the form of a score. Said scores have been classified into the following categories: 1) Compliant (76 - 100); 2) Fairly Compliant (56 - 75); or 3) Inadequate (0 -

55). Any businesses that achieve a “Compliant” rating will be issued a certificate of appreciation by the Minister of Human Rights. Meanwhile, any businesses that achieve a “Fairly Compliant” self-assessment rating will be given two weeks in which to revise their documents, commencing from the date of issuance of the initial verification improvement notes.

75. Draft Bill on Criminal Adjustment

Enforcement Date: -

Summary:

- The Draft Bill on Criminal Adjustment (“**Draft Bill**”) is currently being finalized and will implement the mandate originally set out under Law No. 1 of 2023 on the Criminal Code (*Kitab Undang-Undang Hukum Pidana* - “**KUHP**”). This Draft Bill governs the alignment of all national and regional Laws with the First Book of the KUHP. Key changes include the replacement of short prison terms, as addressed under Laws other than KUHP (“**Non-KUHP Laws**”), with fines, as well as the introduction of proportional fine adjustments and the replacement of cumulative prison terms and fines with an alternative system, while maintaining exceptions for serious crimes (e.g. corruption, terrorism and money laundering).
- Amendments to the KUHP include limiting the fine payment period to one year and stipulating that unpaid fines can only be replaced by prison terms that range from one day to two years, with prior detention being deducted and fines being adjusted in line with any currency changes. Additionally, life prison sentences may now be reduced to 20 years after 10 years have already been served, with reapplication possible five years after any prior denial.
- Certain provisions on the death penalty, general crimes and special crimes (e.g. dissemination of hate speech and false information) are also set to be revised. Finally, the death penalty will not be executable during periods of probation, while factors that trigger penalties for statements of hostility have been narrowed, thereby improving the overall clarity and consistency of legal enforcement.

76. Bill on Criminal Procedural Law

Enforcement Date: -

Summary:

- The Bill on Criminal Procedural Law (“**Bill**”) introduces a modern criminal procedural framework that is fully in line with Indonesia’s prevailing social values, as well as international developments. Key reforms include clearer rules on corporate criminal liability, which will allow both corporations and

responsible individuals to be prosecuted, alongside updated procedures relating to fines, investigations and restorative justice.

- A new Deferred Prosecution Agreement mechanism is also set to be introduced and will enable corporations to seek case suspensions and potential dismissals through the fulfillment of various agreed-upon obligations. The Public Prosecutor and court also have central roles to play in assessing eligibility, monitoring compliance and ensuring that sanctions remain proportionate.
- The Bill also introduces plea bargaining, which will allow defendants who voluntarily admit their guilt and who are cooperative to secure reduced sentences. In this regard, judges must ensure that pleas are valid, oversee simplified hearings and apply a sentencing cap of two-thirds of the maximum penalty.