

New Administrative Requirements and New 2025 KBLI: Key Updates for Foreign Investment Companies

I. Minister of Law ("MOL") Regulation No. 49 of 2025 on the Requirements and Procedures for the Establishment, Changes and Dissolution of Limited Liability Companies ("MOL Regulation No. 49/2025")

MOL Regulation No. 49/2025, which replaces MOL Regulation No. 21 of 2021, introduces several changes to strengthen the administrative services system for limited liability companies in Indonesia.

1. Examination Process

Following the issuance of MOL Regulation No. 49/2025, any application for amendments to the articles of association and changes to the company's data will be followed by an examination process by the MOL through the Director General of General Legal Administration.

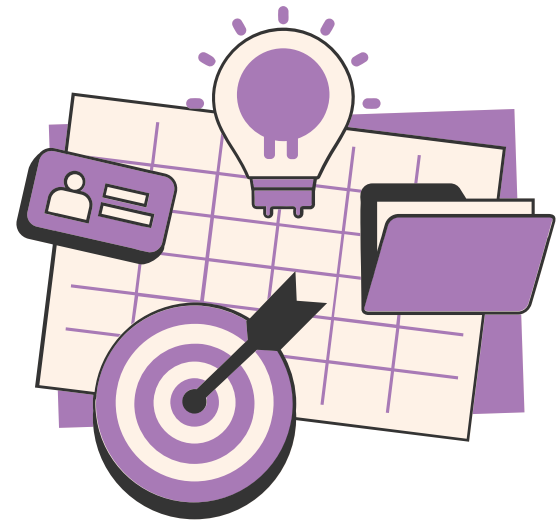
The examination is conducted to verify the conformity of the information submitted through the amendment application form against the uploaded deed and minutes of the General Meeting of Shareholders ("**GMS**") on the amendments to the articles of association / shareholders' resolutions adopted outside a GMS as well as the latest data recorded in the Legal Entity Administration System (*Sistem Administrasi Badan Hukum* / "**SABH**").



The examination process should be completed within 14 business days of the receipt of the application.

2. Annual Report

Under MOL Regulation No. 49/2025, the Board of Directors ("**BOD**") of a limited liability company is required to file GMS approval for the company's annual report (in a notarial deed format) and the annual report through a notary to the MOL within no later than 30 calendar days of the date of the notarial deed.



A company failing to comply with the above requirement will be subject to certain administrative sanctions, in the form of a written warning and blocking of access to the SABH.

3. Beneficial Owner Documents

MOL Regulation No. 49/2025 also requires the submission of additional documents relating to beneficial owner for applications submitted through the SABH for the establishment of a limited liability company, amendments to the articles of association and changes to the company's data.

The required documents include:

- a. a power of attorney granted by the BOD to the notary for the submission of beneficial owner information;
- b. a statement letter issued by the BOD identifying the name of the beneficial owner; and
- c. a letter from the beneficial owner approving the disclosure of his/her beneficial ownership information.

II. Central Statistics Agency (*Badan Pusat Statistik* / “BPS”) Regulation No. 7 of 2025 on Indonesian Standard Business Fields Classification (*Klasifikasi Baku Lapangan Usaha Indonesia* / “KBLI”) (“BPS Regulation No. 7/2025”)

As of 18 December 2025, the 2020 KBLI has been replaced by the 2025 KBLI as provided under BPS Regulation No. 7/2025. Generally, the changes under the 2025 KBLI are more of reclassifications. For instance, under BPS Regulation No. 7/2025:

1. the “Information and Communication” category under the 2020 KBLI is now divided into two categories: (i) Content Publication, Broadcasting as well as Production and Distribution Activities (which remains under category J) and (ii) Telecommunication Activities, Computer Programming, Consultancy, Computing Infrastructure and Other Information Services (which now falls under category K); and
2. while carbon absorption and storage activities fell under KBLI 02402 (Forest Protection and Nature Conservation Services), based on the 2025 KBLI, carbon capture activities fall under KBLI 39001 and carbon storage activities fall under KBLI 39002.

Any companies currently using KBLI(s) that are not in line with the 2025 KBLI are required to adjust their KBLI(s) by no later than 18 June 2026.

There are no particular sanctions for failure to comply with the adjustment requirement above. However, in practice, such failure may lead to the blocking of the General Legal Administration (*Administrasi Hukum Umum*) and Online Single Submission systems due to the inconsistency(ies), which may ultimately affect the relevant companies’ Business Identification Numbers (*Nomor Induk Berusaha*).