

Client Alert



Brigitta I. Rahayoe & Partners

Implementation of KBLI 2025

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Implementation of KBLI 2025

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On 25 March 2026, the Ministry of Investment and Downstream Industry/Head of the Investment Coordinating Board (**BKPM**), the Ministry of Law (“**MOL**”), and the Head of the Central Bureau of Statistics issued the Joint Circular Letter No. 4.S/Tahun 2026, No. M.HH-1.HH.04.02/Tahun 2026, and No. 1/Tahun 2026 regarding the Implementation of the Adjustment to the Indonesian Standard Business Field Classification (*Klasifikasi Baku Lapangan Usaha Indonesia* – “**KBLI**”) of 2025 in the Administration of the Risk Based Business Licensing (herein referred to as “**Circular Letter**”).

The Circular Letter serves as an operational technical guideline for ministries/agencies, regional governments, notaries, and business entities in implementing the adjustment to KBLI 2025, particularly within the Directorate General of General Law Administration (*Direktorat Jenderal Administrasi Hukum Umum* – “**Ditjen AHU**”) system, Online Single Submission (“**OSS**”) system, and other ministerial/agency systems integrated with the OSS system.

In relation to the implementation of KBLI 2025, the following are several key provisions under the Circular Letter:

1. Validity of Existing Licenses

All basic requirements (including environmental approvals), business licenses (such as business identification number), and/or business licenses to support business activities (including electronic system operator registration), that were issued, verified, or approved prior to the implementation of KBLI 2025 will continue to remain valid.

2. Amendment to the Articles of Association (“AOA”)

A business entity is required to amend its AOA if there is any change to the company’s purposes and objectives and/or business activities. However, an amendment to the AOA is not required if the change is limited to the numerical KBLI code and does not result in a substantive change to the purposes and objectives or the scope of business activities as stipulated in the AOA. The adjustment of the KBLI code will be carried out automatically by the Ditjen AHU and OSS systems.

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3. Government Implementation Timeline

The adjustment to KBLI 2025 within the Ditjen AHU and OSS systems will be implemented by the MOL and BKPM no later than 18 June 2026.

As of the date of this Client Alert, KBLI 2025 has not yet been implemented in the Ditjen AHU system, OSS system, and other ministerial/agency systems integrated with the OSS system, as these systems are still undergoing adjustments.

4. Use of KBLI 2020 During the Transition Period

During the transition period until the implementation of KBLI 2025 as referred to above:

- a. the Ditjen AHU system will continue processing the legalization of business entities using KBLI 2020; and
- b. the OSS system will continue processing risk based business licensing using KBLI 2020.

This Client Alert is intended to provide a brief overview only on the Circular Letter, thus, cannot be deemed as legal advice. Please do not hesitate to contact us if you need a more detailed discussion, advice, and/or have specific questions.

For further information regarding the above Client Alert and future updates, please contact our counselors at:

Ahmad Fadli:	ahmad.fadli@brigitta.co.id
Chantika Putri:	chantika.putri@brigitta.co.id
Michael Wibowo Joestiawan:	michael.joestiawan@brigitta.co.id

BRIGITTA I. RAHAYOE & PARTNERS

Suite 9B, 9th Floor, Sahid Sudirman Centre
The Sahid City Complex
Jl. Jend. Sudirman No. 86
Jakarta Pusat 10220
Indonesia
P : +6221 2788 9027
W: <http://www.brigitta.co.id>