



Client Alert

Brigitta I. Rahayoe & Partners

Designation of Non-active Corporation

READ TIME
🕒 8 MINS

PUBLISHED DATE
📅 26 MAY 2026

Designation of Non-active Corporation

RELATED PEOPLE



Ahmad Fadli
Senior Associate



Chantika Putri
Associate



**Michael Wibowo
Joestiawan**
Junior Associate

The information system developed by the Directorate General of General Legal Administration (*Direktorat Jenderal Administrasi Hukum Umum* – “**Ditjen AHU**”) under the Ministry of Law of the Republic of Indonesia (“**MOL**”) maintains comprehensive corporate records, including data on establishment, amendments, and dissolution. Corporations are required to notify MOL, through the Ditjen AHU, of any updates or changes to their corporate information.

To maintain orderly administration and ensure the accuracy of corporate data, the Ditjen AHU continues to enhance and update its information system. As of 2025, all corporations are required to update their beneficial ownership information at least once annually in the Ditjen AHU system. Non-compliance with this requirement may result in the corporation’s data being blocked in the Ditjen AHU system.

On 11 February 2026, the MOL issued the Circular Letter No. AHU-AH.01-36 TAHUN 2026 regarding the Administrative Designation of Non-Active Corporations and the Obligations to Report and Verify Beneficial Ownership (“**Circular Letter**”). This Circular Letter outlines the procedures for designating limited liability companies, foundations, and associations (collectively referred to as “**Corporation**”) as “Non-Active” within the Ditjen AHU system. This designation may be imposed on a Corporation that fails to update its data for a period of 5 (five) consecutive years. In such cases, the system may also impose a blocking status on the relevant Corporation.

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

CONTINUE TO THE NEXT PAGE ►



1. Mechanism for Designation as Non-Active Corporation

The designation of non-active Corporation status in the Ditjen AHU system will be conducted in the following stages:

a. Temporary List of Non-Active Corporation

A Corporation that has not carried out any corporate data update within the 5 (five) years prior to the issuance date of the Circular Letter (i.e., since 11 February 2021) will be included in the temporary list of non-active corporations. This information will be announced by the Ditjen AHU through newspapers, the Ditjen AHU system, and the Ditjen AHU's official social media channels.

b. Permanent List of Non-Active Corporation

If a Corporation fails to update its corporate data in the Ditjen AHU system within 6 (six) months following publication of the temporary list, the Corporation will be placed on the permanent list of non-active corporations. A Corporation included on this list will be designated as "Non-Active" in the Ditjen AHU system, and this status will also be reflected in the company's name in its corporate profile.

2. Reactivation of Active Status

A Corporation designated as "Non-Active" may reactivate its status by completing the required corporate data updates. Once the update is successfully processed in the Ditjen AHU system, the "Non-Active" designation will be automatically removed, and the Corporation's name will be removed from the permanent non-active list.

CONTINUE TO THE NEXT PAGE ►



3. Corporation under Blocked Status

For a Corporation that is classified as “Non-Active” and is also subject to a blocking status in the Ditjen AHU system due to failure to carry out periodic beneficial ownership updates, an application to lift the blocking must first be submitted. This can be done by:

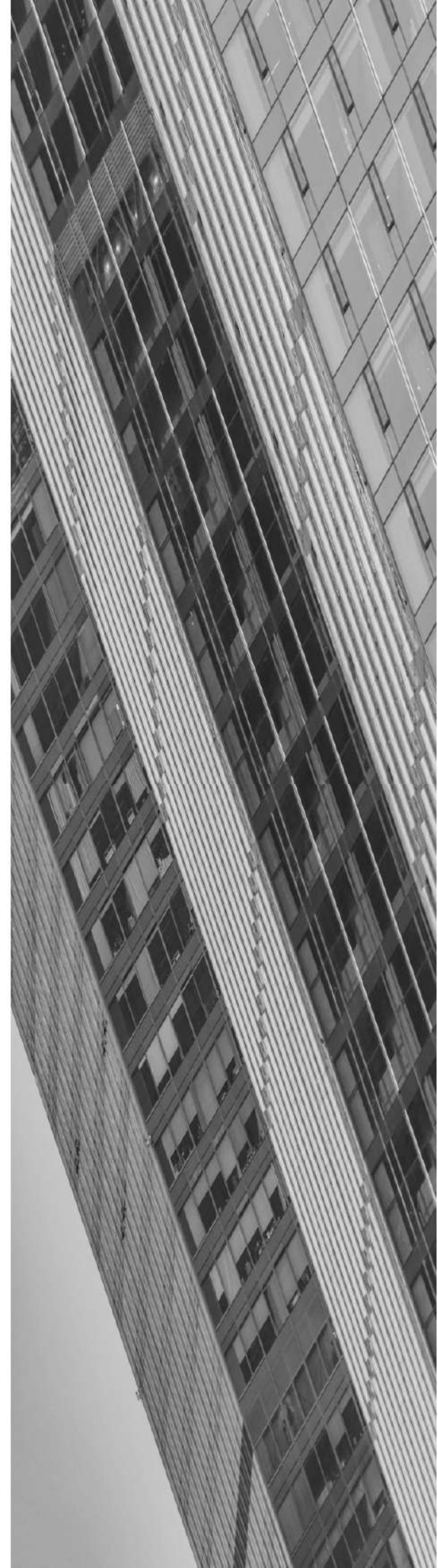
- a. submitting or updating the Corporation’s beneficial ownership information in the Ditjen AHU system; and/or
- b. specifically for limited liability companies, completing the applicable requirements to lift the blocking status in the Ditjen AHU system.

Conclusion

With the issuance of the Circular Letter, every Corporation is expected to actively update its corporate data periodically at least once every year and/or conduct corporate data update within 5 (five) years through the Ditjen AHU system. Non-compliance with these obligations may result in the imposition of administrative blocking of a Corporation’s data and/or the designation of “Non-Active” status within the Ditjen AHU system, which in practice may affect the Corporation’s administrative processes.

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.

CONTINUE TO THE NEXT PAGE ►



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 J.: 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 : <https://www.brigitta.co.id>