

INDONESIA TIGHTENS CORPORATE PROCEDURES FOR COMPANIES WITH NEW MOL REGULATION 49/2025

January 2026

The Minister of Law (“MOL”) has issued a new Regulation No. 49 of 2025 concerning the Requirements and Procedures for the Establishment, Amendment and Dissolution of Legal Entities – Limited Liability Companies (“MOL Reg 49/2025”), which came into effect on 17 December 2025. This Regulation revokes the previous MOL Regulation No. 21 of 2021.

Key Highlights:

The main changes introduced by MOL Reg 49/2025 for a limited liability company (“Company”) include the introduction of a new verification stage by the MOL for applications relating to amendments to the Company’s Articles of Association and company data, as well as the requirement for the Company to submit its annual report to the MOL.

Corporate Amendments

The MOL now conducts administrative verification for applications requesting amendments to a Company’s Articles of Association or company data. This process is to ensure that the documents submitted are consistent with the latest records in the MOL’s online system, and takes up to 14 working days.

Annual Report Submission

Under the Company Law (as amended), a Company’s Board of Directors is required to submit the annual report to the General Meeting of Shareholders within 6 months after the end of the financial year, following review by the Board of Commissioners. Although the Company Law is silent on this issue, MOL Reg 49/2025 now requires that approval of the annual report by the shareholders must be documented in a notarial deed and submitted, along with the annual report, to the MOL within 30 days from the date of the notarial deed. Failure to comply may result in administrative sanctions, beginning with a written warning. If the non-compliance is not remedied within 30 days, access to the MOL’s online system may be suspended.

Beneficial Ownership Documents

MOL Reg 49/2025 also adds the requirement to provide beneficial ownership documents for filings to the MOL including a power of attorney and a statement letter from the Board of Directors and an approval as a beneficial owner.

For further assistance, please contact Cisca Harun, Partner (ciscah@mkklaw.net) or Dian Octavika Aristyani, Senior Associate (dian@mkklaw.net).