



Issuance of a Circular Letter regarding the Transition to KBLI 2025

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1. Introduction

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 jointly issued 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 Adjustments to the Indonesian Standard Industrial Classification (*Klasifikasi Baku Lapangan Usaha Indonesia* – “KBLI”) 2025 in the administration of risk-based business licensing (the “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.

2. No Requirement to Amend the Articles of Association Due to the Update of KBLI Codes

This Circular Letter stipulates the following points regarding amendments to the Articles of Association in connection with the transition to KBLI 2025:

- **Automatic Update**

If the transition to KBLI 2025 involves only a change in the numerical code, without affecting the nature, scope, or purpose of the business, the OSS and AHU systems will automatically update the data.

- **No Need to Amend Deed**

In such cases, companies do not need to amend their Articles of Association. This means no notary process and no additional administrative burden.

- **Existing Licenses Remain Valid**

All previously issued and verified licenses, including Business Licenses (PB), Basic Requirements (PD), and Supporting Licenses (PB UMKU), will remain valid despite the code changes.

3. Requirement to Amend the Articles of Association in Certain Cases

This Circular Letter also states that amendments to the Articles of Association are not always unnecessary, and that in the following cases, such amendments are required:

- **Corporate Actions**

If a company decides to change its business purpose, objectives, or actual activities, it must amend its Articles of Association through the AHU system in accordance with the applicable procedures.

- **Incomplete Coverage**

If a business activity under KBLI 2025 is not yet covered in the company’s existing Articles of Association, the company must update its deed to reflect the relevant business activity.

4. Implementation



To accommodate the large-scale automatic updates described above, the government is currently proceeding with the integration of various systems. In this regard, this circular also stipulates the following points concerning the transition of these systems:

• **System Deadline**

The Ministry of Investment/BKPM and the Ministry of Law are required to complete the integration of KBLI 2025 into the OSS and AHU systems by 18 June 2026.

• **Current Process**

Until this deadline, both systems will continue to process new and existing licenses under the KBLI 2020 framework.

5. **Conclusion**

As stated above, this circular clarifies that, with respect to the transition to KBLI 2025, companies that continue their business within the same scope as their existing business activities under KBLI 2020 are, in principle, not required to amend their Articles of Association. It also sets out the handling procedures during the system transition period.

On the other hand, since the classification system itself has been revised under KBLI 2025, there may be cases where the KBLI 2020 codes do not fully correspond, even if there is no change in the actual business activities. As a result, it is possible that updates to the KBLI codes may still be required.

Accordingly, in practice, it is advisable for each company to individually verify the correspondence between its KBLI codes and its business activities.

However, as this circular does not clearly specify the concrete measures to be taken in such cases, it is considered necessary to continue monitoring future practical developments closely.

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