

IMPLEMENTATION OF KBLI 2025: WHAT BUSINESS ACTOR NEED TO KNOW ABOUT THE OSS SYSTEM, ARTICLES OF ASSOCIATION, AND BUSINESS LICENSING

+62 21 8051 1616

ATTORNEYS@WP-ATTORNEY.COM

WWW.WP-ATTORNEY.COM

01. Introduction

On 17 December 2025, the Bureau of Statistics (*Badan Pusat Statistik* or “**BPS**”) issued BPS Regulation Number 7 of 2025 concerning the Indonesian Standard Business Classification (“**BPS Regulation 7/2025**”), which establishes the Indonesian Standard Industrial Classification (*Klasifikasi Baku Lapangan Usaha Indonesia* or “**KBLI**”) 2025 as the business activity classification standard to be used in the implementation of risk-based business licensing through the Online Single Submission (“**OSS**”) system. BPS Regulation 7/2025 requires all business activity classifications that still refer to any earlier version of the KBLI to be aligned with KBLI 2025 no later than 6 (six) months from the issuance of BPS Regulation 7/2025.

Following the implementation of BPS Regulation 7/2025, the Minister of Investment and Downstream Industry/Head of the Investment Coordinating Board, the Minister of Law, and the Head of BPS jointly issued a Joint Circular Letter on the Implementation of the Adjustment to the Indonesian Standard Business Classification 2025 in the Administration of Risk-Based Business Licensing (“**Joint Circular Letter**”), which stipulates that KBLI 2025 has been implemented in the OSS System as of 18 June 2026.

Furthermore, the Joint Circular Letter provides guidance on the implementation of KBLI 2025 within the OSS System, the Directorate General of General Legal Administration (*Direktorat Jenderal Administrasi Hukum Umum* or “**Ditjen AHU**”) System and other systems integrated with the OSS System. In addition to regulating the mechanism for the conversion of KBLI codes, the Joint Circular Letter also clarifies the validity of existing business licenses, amendments to articles of association of the Company and several other administrative matters that business actors should take into account in connection with the administration of risk-based business licensing.

02. Key Changes Under KBLI 2025

Based on the Joint Circular Letter, the conversion from KBLI 2020 to KBLI 2025 falls into the following 3 (three) categories:

- **‘One-to-One’ KBLI Conversion** (*KBLI A becomes KBLI B*): This category involves changes in numerical code, titles, descriptions and/or a combination thereof of an existing KBLI code.
- **‘One-to-Many’ KBLI Conversion** (*KBLI A becomes KBLI A and KBLI B*): This category divides a single KBLI 2020 code into multiple KBLI 2025 codes as an adjustment to ISIC classification and/or to accommodate new business activities that were previously not classified separately.
- **‘Many-to-One’ KBLI Conversion** (*KBLI A and KBLI B become KBLI A*): This category merges multiple KBLI 2020 codes into a single KBLI 2025 code as part of the alignment to ISIC classification and/or simplification of business activity classifications.

03. Will Business Licenses Issued Prior to the Implementation of KBLI 2025 Remain Valid?

The Joint Circular Letter confirms that the implementation of KBLI 2025 does not invalidate or otherwise affect the validity of basic requirements, business licenses and/or business licenses to support business activities (*Perizinan Berusaha untuk Menunjang Kegiatan Usaha* or “**PB UMKU**”) that were issued, verified or approved prior to the implementation of KBLI 2025 in the administration of risk-based business licensing.

In this regard, all basic requirements, business licenses and PB UMKU issued prior to the implementation of KBLI 2025 will remain valid in accordance with the prevailing laws and regulations.

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04. Are Business Actors Required to Amend Their Articles of Association?

Not all business actors are required to amend the purposes and objectives set out in their articles of association. In principle, the Joint Circular Letter distinguishes between circumstances requiring an amendment to the articles of association of the Company and those requiring only administrative adjustments, as follows:

- **Amendment to the Articles of Association is Required**

An amendment to the articles of association of the Company is required where business actors **undertake corporate action resulting in changes to the Company's purposes and objectives or changes to its existing business activities**, as provided under the prevailing laws and regulations. In such circumstances, the adjustment to KBLI 2025 must be reflected in a notarial deed of amendment to the articles of association of the Company.

- **Amendment to the Articles of Association is Not Required**

Where the adjustment merely involves changes to the numerical KBLI code based on the official conversion table, without resulting in any substantive changes to the Company's purposes and objectives or the scope of its business activities as stipulated in its articles of association, business actors are not required to amend their articles of association. In such cases, the adjustment will be carried out automatically through the Ditjen AHU System and the OSS System based on the prescribed conversion table.

Nevertheless, business actors that are still using KBLI versions predating KBLI 2020 are required to first update their corporate data in the Ditjen AHU System before converting to KBLI 2025.

05. Conclusion

The implementation of KBLI 2025 forms part of the government's efforts to align the classification of business activities used in the administration of risk-based business licensing with evolving economic activities and international classification standards. Through the Joint Circular Letter, the government also provides greater regulatory certainty regarding the implementation of KBLI 2025, including the continued validity of existing business licenses, the adjustment mechanism within the OSS System and the Ditjen AHU System and the circumstances in which amendments to the articles of association of the Company are or are not required.

For business actors, understanding these provisions is essential to ensure that the implementation of KBLI 2025 does not give rise to unnecessary issues in the management of corporate documents or business licensing administration, particularly when updating corporate information or undertaking future corporate actions.

CONTACT US



Iyarman Waruwu
Managing Partner
+62 21 8051 1616 ext. 100
+62 812-5033-3330
iyarman@wp-attorney.com



Mikael Husni
Senior Associate
+62 21 8051 1616 ext. 101
mikael.husni@wp-attorney.com



Puti Najlahana
Associate
+62 21 8051 1616 ext. 107
puti@wp-attorney.com