



New Verification Rules for Changes to Company Registration Records

Introduction

Limited liability companies in Indonesia must now go through a verification process when updating their information in the government's company registry. The change, which took effect on 27 October 2025, was introduced by the Directorate General of General Legal Administration (**"Ditjen AHU"**) under the Ministry of Law.

The new process replaces the previous self-declaratory system, where notaries could submit company changes online without further review. Under the revised policy, Ditjen AHU officers will now substantively verify the following types of company data changes submitted through the Legal Entity Administration System (*Sistem Administrasi Badan Hukum* – **"SABH"**):

- Changes to the composition of the Board of Directors and Board of Commissioners;
- Share transfers; and
- Changes in shareholder names.

The change aims to improve the accuracy of company data recorded in the SABH, addressing recurring issues such as unreported share transfers, discrepancies between uploaded and original deeds, and formal defects in uploaded documents.

Verification Process

The substantive verification will focus on ensuring that:

1. The reported changes align with the uploaded documents;
2. All supporting documents are valid and complete; and
3. The company's record in the registry remains consistent and free from overlapping entries.

As part of the new process, notaries must enter the active email addresses of all shareholders when submitting company changes. The SABH system will then send automatic confirmation emails to those shareholders, who must respond within seven days. In practice, the confirmation emails will also be sent to all members of the Board of Directors and the Board of Commissioners.

If the confirmation email is not verified/confirmed within that period, the application will be automatically rejected. In cases of incorrect email entry or shareholding data, the notary may cancel the transaction within seven calendar days.

The entire verification process is expected to take approximately 14 days, including the confirmation period.

To date, the policy has not been formalized in a ministerial regulation or a circular letter, though further implementing guidance from Ditjen AHU is expected.

Potential Issues

The new policy will lengthen the overall processing time for company data changes and may affect most transactions, as closing procedures and potentially payment terms will need to be adjusted accordingly.

Separate from this new policy, there are indications that the Ministry of Law intends to revise the regulation on Beneficial Ownership (BO) currently governed by Presidential Regulation No. 13 of 2018 and Minister of Law Regulation No. 2 of 2025. Local media reports suggest that the revision will expand the concept of BO to cover other sectors such as tax and licensing.

Companies and business actors are advised to keep monitoring developments on this new policy and, in the meantime, maintain close coordination with notaries to ensure a smooth verification process.

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A Summitmas I, 16th & 17th Floors
Jl. Jend. Sudirman Kav. 61-62
Jakarta 12190

P +6221 5080 8300
+6221 252 1272

 makarim.com  Makarim & Taira S.



Reagan Roy Teguh

Partner

reagan.teguh@makarim.com



Demi Narendra Soegandhi

Associate

demi.soegandhi@makarim.com