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**CRYPTOASSETS &
BLOCKCHAIN**

Indonesia



LEXOLOGY

Cryptoassets & Blockchain

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GENERAL LEGAL AND REGULATORY FRAMEWORK

Legal framework**What legal framework governs cryptoassets? Is there specific legislation governing cryptoassets and businesses transacting with cryptoassets?**

- Depending on its characteristics, an STO would constitute Tokenised Assets under the Draft Offering Regulation. Key requirements under the Draft Offering Regulation include:
- **Public offering threshold:** An offering is regulated if it is conducted within Indonesia, using mass media, or offered to more than 100 parties.
- **Offering requirement (licensing v notification):** Issuers conducting a public offering of cryptoassets with a cumulative value exceeding 1 billion rupiah are required to obtain an OJK business licence. Offerings below this threshold are subject to notification requirements, and multiple offerings may be aggregated for threshold purposes.
- **Local presence:** Issuers must be established as an Indonesian limited liability company (PT). In practice, this requires, among others:
 - A locally incorporated entity;
 - (1) a board of directors with a majority Indonesian citizens domiciled in Indonesia, and (2) a president director who is an Indonesian citizen domiciled in Indonesia.
- **Approval:** Unlike unbacked cryptoassets, backed cryptoassets, public offerings of tokenised assets require direct approval from the OJK for the offering. The regulation does not only require issuer licensing, it also provides that where an issuer that is already licensed intends to offer a new tokenised asset, it must obtain OJK approval for that offering before conducting the offer.
- **Underlying asset ownership and control, valuation:** The underlying asset to be tokenised must (among other conditions) be legally under the issuer's control/ownership, must not be in dispute and must not be encumbered (or otherwise the draft requires compliance with its conditions). In addition, assets eligible for tokenisation are subject to express limitations, including that the tokenised asset must not be a derivative of financial assets and must not be a cryptoasset.
- **Disclosure document:** The information document must clearly describe: legal rights attached to the tokens (eg, income, voting, redemption), custody arrangements, risk allocation and investor exit mechanisms, and other required items.

Yes. Indonesia has established a specific and increasingly integrated legal and regulatory framework governing cryptoassets.

The principal statutory foundation is Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector (Law 4/2023).

This law fundamentally reclassified cryptoassets from commodities into the broader category of Digital Financial Assets and transferred regulatory authority from the commodity futures regime into the financial services regulatory regime. As a result, cryptoassets are now treated as financial instruments for regulatory purposes, subject to prudential

supervision, licensing, governance, and consumer-protection standards under the financial sector framework.

The core implementing regulation for the trading infrastructure is the Financial Services Authority (OJK) [Regulation No. 27 of 2024 on the Organisation of Digital Financial Asset Trading Activities](#), as amended by [OJK Regulation Number 23 of 2025](#) (OJK Reg. 27/2024), which amendment became fully effective on 10 January 2025, following the completion of the regulatory transition from Bappebti to the OJK.

OJK Reg. 27/2024 governs, among others:

- digital financial asset exchanges, the legal entity responsible for listing, approval and oversight of digital financial assets offerings. This is distinct from “traders”, which typically denotes the exchange platform that operates the trading system and facilitates transactions for customers;
- digital financial asset traders, this refers to typically centralised crypto exchanges or exchange platforms, the legal entity that engages in the trading of digital financial assets, either on its own behalf and/or by facilitating consumers;
- clearing institutions/clearinghouses; and
- depository managers/custody Institutions (Custodian).

This regulation establishes detailed requirements on licensing, capital, governance, segregation of assets, market conduct, technology risk management and consumer protection.

To accommodate emerging innovations, the OJK has also implemented [OJK Regulation No. 3 of 2024 concerning the Organisation of Technological Innovation in the Financial Sector](#) (OJK Reg. 3/2024). This regulation establishes the Financial Sector Technological Innovation framework (FSTI), which explicitly includes crypto-assets. It creates a Regulatory Sandbox mechanism allowing businesses to test novel crypto models under OJK supervision before they fall under specific licensing regimes.

Separately, the OJK has also issued a draft [OJK regulation on the Offering of Digital Financial Assets](#) (Draft Offering Regulation), currently still in consultation and internal finalisation as of January 2026. While not yet enacted, this draft regulation represents the authoritative regulatory direction of the OJK and introduces a formal framework for all kinds of cryptoasset offerings.

Law stated - 1 March 2026

Government policy

How would you describe the government’s general approach to the regulation of cryptoassets in your jurisdiction?

The Indonesian government’s approach to cryptoassets is prudential, integrative, and progressively institutional. Historically, cryptoassets were regulated as speculative commodities. This position has materially evolved following the enactment of Law 4/2023, which reflects a deliberate policy decision to integrate cryptoassets into the formal financial

system while maintaining strong safeguards for monetary sovereignty, financial stability and consumer protection.

The transfer of regulatory authority from Bappebti to the OJK in January 2025 signals that cryptoassets are now viewed as financial market instruments requiring supervision comparable to capital-markets products, rather than retail commodities.

At the same time, Indonesia remains strictly conservative on monetary use cases. Cryptoassets are expressly prohibited from being used as a means of payment, preserving the Indonesian rupiah as the sole legal tender.

Simultaneously, the government encourages technological advancement through the FSTI framework. This regime allows for a "regulatory sandbox" where novel business models that do not fit neatly into existing licensing categories can be tested under OJK supervision.

Law stated - 1 March 2026

Regulatory authorities

Which government authorities regulate cryptoassets and businesses transacting with cryptoassets?

The OJK is the primary regulator and supervisor of cryptoassets in Indonesia. Effective 10 January 2025, regulatory and supervisory authority over digital financial assets, including cryptoassets and related market infrastructure, was formally transferred from Bappebti to the OJK pursuant to Law 4/2023 and its implementing regulations.

Law stated - 1 March 2026

Regulatory penalties

What penalties can regulators impose for violations relating to cryptoassets?

The OJK has broad enforcement powers under Law 4/2023 and OJK Reg. No. 27 of 2024.

For administrative violations, the OJK may impose:

- written warnings;
- administrative monetary fines;
- restrictions or suspension of business activities;
- suspension of specific products or services;
- revocation of licences; and
- disqualification of controlling shareholders, directors and commissioners through inclusion in the List of Disqualified Persons .

The amount and type of administrative fines vary depending on the violation and are set out in implementing regulations and OJK enforcement practice. Additionally, the OJK may exercise transaction/product-level supervisory measures under OJK Reg. 27/2024, including: (1) prohibiting trading of a particular Digital Financial Asset (permanent or temporary), and (2)

ordering the exchange to remove the asset from the official list and/or the trader to stop trading the relevant asset.

Law 4/2023 provides a separate enforcement layer through criminal provisions (including in areas covering FSTI and consumer protection). Criminal liability, including imprisonment and/or criminal fines, may apply where conduct meets the elements of an offence under the applicable criminal provisions of Law 4/2023 and/or other applicable Indonesian legislation. Criminal prosecution is pursued by the competent law-enforcement authorities and the public prosecutor, the OJK's role is regulatory/supervisory and, where applicable, within its statutory remit, may include examination and investigation functions and coordination in accordance with the prevailing legal framework.

Law stated - 1 March 2026

Court jurisdiction

Which courts have jurisdiction over disputes involving cryptoassets?

Disputes involving cryptoassets generally fall within the jurisdiction of the General Courts for civil and criminal matters.

Certain disputes are subject to specialised forums:

- Commercial Court, for insolvency, bankruptcy and Suspension of Debt Payment Obligations proceedings involving cryptoasset companies.
- Alternative Dispute Resolution Institution for the Financial Services Sector, an OJK-recognised alternative dispute resolution institution handling consumer disputes in the financial services sector, where agreed contractually.
- State Administrative Court: challenges to administrative decisions issued by the OJK, such as licensing or enforcement actions.

Law stated - 1 March 2026

Legal status of cryptocurrency

Is it legal to own or possess cryptocurrency, use cryptocurrency in commercial transactions and exchange cryptocurrency for local fiat currency in your jurisdiction?

The ownership and possession of cryptocurrency are lawful. Individuals and legal entities may hold cryptoassets in Indonesia, as such assets are recognised as digital financial assets and can be held for investment or utility purposes.

However, cryptocurrency may not be used as a means of payment in Indonesia. Indonesian currency law mandates the use of rupiah for all transactions conducted within the territory of Indonesia. As a result, cryptoassets are expressly prohibited from being used to settle payment obligations or as consideration in onshore commercial transactions.

Notwithstanding the above restriction, cryptoassets may be lawfully exchanged for Indonesian rupiah. Such exchanges must be conducted through a licensed digital financial

asset trader (on a regulated platform. The regulatory framework specifically facilitates the "on-ramp" and "off-ramp" conversion between rupiah (IDR) and cryptoassets through segregated bank accounts.

Law stated - 1 March 2026

Fiat currencies

What fiat currencies are commonly used in your jurisdiction?

The rupiah (IDR) is the sole legal tender. While cryptoasset exchanges may display prices in foreign currencies (eg, US\$ or USDT) for reference, the actual settlement of fiat funds for Indonesian users must occur in IDR. All deposits and withdrawals from regulated crypto exchanges are processed in rupiah through the local banking system.

Law stated - 1 March 2026

Industry associations

What are the leading industry associations addressing legal and policy issues relating to cryptoassets?

- ASPAKRINDO: This is the primary association representing licensed cryptoasset traders.
- ABI (Asosiasi Blockchain Indonesia): This association represents the broader blockchain and Web3 ecosystem, including technology developers and non-exchange crypto businesses.

Law stated - 1 March 2026

CRYPTOASSETS FOR INVESTMENT AND FINANCING

Regulatory threshold

What attributes do the regulators consider in determining whether a cryptoasset is subject to regulation under the laws in your jurisdiction?

Regulatory scope is determined by whether a digital asset falls within the statutory definition of a Digital Financial Asset under Law 4/2023 and its implementing regulations.

In substance, in our view, regulators consider the following core attributes:

- Digital representation of value: The asset must represent value in digital form, whether or not backed by an underlying asset.
- Use of distributed ledger technology (DLT): The asset must be created, recorded, stored, or transferred using blockchain or similar distributed ledger technology, or may also be structured by reference to an underlying digital financial asset (including crypto assets or other digital financial assets in the official list).
-

Specifically under the Draft Offering Regulation, electronic transferability/tradability: The asset must be capable of being issued, stored, transferred and/or traded electronically using DLT (or other technology), and assets that cannot be transacted/transferred between consumers are generally outside the offering perimeter.

- Specifically under the Draft Offering Regulation, not a “digitised record” of conventional financial assets held at financial institutions: The criteria expressly exclude assets that are “recorded electronically by financial services institutions” (ie, the regime is aimed at digital financial assets, not ordinary electronic book-entries of conventional financial products).

Under the Draft Offering Regulation, the Financial Services Authority (OJK) further distinguishes between:

- cryptoassets, which may be backed or unbacked and do not represent traditional securities; and
- tokenised assets, which represent digital tokens backed by or linked to underlying financial or real-sector assets. Digital assets that are closed-loop, non-transferable or non-convertible (for example, in-game points) are generally treated as outside the Digital Financial Asset regime.

Law stated - 1 March 2026

Investor classification

How are investors in cryptoassets classified and treated differently?

Indonesian cryptoasset regulations do not formally classify investors into retail, accredited or professional categories for access purposes. The regulatory approach is deliberately non-segmented and is built on a uniform baseline of consumer and investor protection applicable to all users.

However, OJK Reg. 27/2024 does distinguish between individual consumers and non-individual consumers such as business entities or legal entities, with specific minimum eligibility conditions and supporting declarations. For example, non-individual consumers must, among other things, have domicile in Indonesia and be for investment purposes (not as a payment/wealth transfer instrument), and must use their own funds/assets (not third-party or criminal proceeds), evidenced by written statements.☒

Operationally, the regulation requires baseline onboarding and risk disclosure measures. In accepting prospective consumers, the trader must provide an agreement covering at least the trader profile, risk statement and trading procedures; and the risk statement must include at minimum risks of price fluctuation, system failure and other relevant risks.

OJK Reg. 27 references a “knowledge test” mechanism specifically in relation to consumer acceptance for trading in digital financial asset derivatives (through xchange-related rules and systems), including learning modules, test format, passing grade and guidance for traders in administering the test via their platforms connected to the exchange’s derivatives trading system. This is not stated as a universal requirement for all prospective crypto spot trading consumers.

Initial coin offerings

What rules and restrictions govern the conduct of, and investment in, initial coin offerings (ICOs)?

Initial coin offerings are addressed under the Draft Offering Regulation. As this is a draft instrument and has not yet been enacted, it should be treated as a proposed framework rather than binding law.

Key regulatory elements include:

- **Public offering threshold:** An offering is regulated if it is conducted within Indonesia, using mass media or offered to more than 100 parties.
- **Exclusions:** The Draft Offering Regulation excludes certain digital assets from the offering regime, including (among others) assets with the characteristics of securities, assets issued by a central bank (Central Bank Digital Currency (CBDC) is cited as an example), and assets that cannot be transacted/transferred between consumers, as well as certain closed-loop and NFT-type characteristics.
- **Offering requirement (licensing vs notification):** Issuers conducting a public offering of cryptoassets with a cumulative value exceeding 1 billion rupiah are required to obtain an OJK business licence. Offerings below this threshold are subject to notification requirements, and multiple offerings may be aggregated for threshold purposes.
- **Local presence:** Issuers must be established as an Indonesian limited liability company (PT). In practice, this requires, among others:
 - a locally incorporated entity;
 - appointment of a majority of Indonesian nationals to their board of directors, with the president director being an Indonesian national.
- **Approval:** For "Unbacked Crypto Assets" (typical utility tokens), the offering must be reviewed and approved by the licensed exchange, which conducts an analysis applying prudential principles and prioritising consumer protection, based on its guideline/policy for approving such offerings.
- **Disclosure document:** Issuers must publish a comprehensive information document (commonly referred to as a white paper), disclosing, among others, project description and objectives, token economics, use of proceeds. Misleading statements or omissions may expose the issuer and its controlling persons to administrative and criminal liability under financial services and consumer protection laws.

Security token offerings

What rules and restrictions govern the conduct of, and investment in, security token offerings (STOs)?

Depending on its characteristics, an STO would constitute Tokenised Assets under the Draft Offering Regulation. Key requirements under the Draft Offering Regulation include:

- **Public offering threshold:** An offering is regulated if it is conducted within Indonesia, using mass media, or offered to more than 100 parties.
- **Offering requirement (licensing v notification):** Issuers conducting a public offering of cryptoassets with a cumulative value exceeding 1 billion rupiah are required to obtain an OJK business licence. Offerings below this threshold are subject to notification requirements, and multiple offerings may be aggregated for threshold purposes.
- **Local presence:** Issuers must be established as an Indonesian limited liability company (PT). In practice, this requires, among others:
 - a locally incorporated entity;
 - a board of directors with a majority Indonesian citizens domiciled in Indonesia, and a president director who is an Indonesian citizen domiciled in Indonesia.
- **Approval:** Unlike unbacked cryptoassets, backed cryptoassets, public offerings of tokenised assets require direct approval from the OJK for the offering. The regulation does not only require issuer licensing, it also provides that where an issuer that is already licensed intends to offer a new tokenised asset, it must obtain OJK approval for that offering before conducting the offer.
- **Underlying asset ownership and control, valuation:** The underlying asset to be tokenised must (among other conditions) be legally under the issuer's control/ownership, must not be in dispute and must not be encumbered (or otherwise the draft requires compliance with its conditions). In addition, assets eligible for tokenisation are subject to express limitations, including that the tokenised asset must not be a derivative of financial assets and must not be a cryptoasset.
- **Disclosure document:** The information document must clearly describe: legal rights attached to the tokens (eg, income, voting, redemption), custody arrangements, risk allocation and investor exit mechanisms and other required items.

Law stated - 1 March 2026

Stablecoins

What rules and restrictions govern the issue of, and investment in, stablecoins?

Stablecoins are considered as are regulated as backed crypto assets under the Draft Offering Regulation. Key rules and restrictions include:

- **Public offering threshold:** An offering is regulated if it is conducted within Indonesia, using mass media or offered to more than 100 parties.

- **Offering requirement (licensing v notification):** For public offerings of backed crypto assets, issuers conducting a public offering of cryptoassets with a cumulative value exceeding 1 billion rupiah are required to obtain an OJK business licence. Offerings below this threshold are subject to notification requirements, and multiple offerings may be aggregated for threshold purposes.
- **Local presence:** Issuers must be established as an Indonesian limited liability company (PT). In practice, this requires, among others:
 - a locally incorporated entity;
 - a board of directors with a majority Indonesian citizens domiciled in Indonesia; and
 - a president director who is an Indonesian citizen domiciled in Indonesia.
- **Approval:** Similar to STOs, issuers of stablecoins must obtain an approval directly from the OJK for the Public Offering.
- **Reserve requirement:** Issuers must maintain reserves with a value of at least 100% of the circulating supply.
- **Segregation and custody mechanics:** The Draft requires reserve assets to be stored through the designated custody framework and to be legally separated, including being legally distinct from the issuer's assets and protected against third-party creditor claims, and not subject to pledges/encumbrances that would impair redemption.
- **Eligible reserve assets:** Reserves must consist of cash, cash equivalents or other high-quality liquid assets acceptable to the OJK.

Law stated - 1 March 2026

Airdrops

Are cryptoassets distributed by airdrop treated differently than other types of offering mechanisms?

Yes, the Draft Offering Regulation explicitly excludes cryptoassets distributed "free of charge" from the definition of a regulated public offering. Therefore, a genuine airdrop where no monetary consideration is provided by the receiver does not trigger the public offering requirements. Nevertheless, an airdrop may still be treated as a regulated offering if: (1) it is conditional upon the provision of material value or consideration; or (2) it is structured as a de facto promotional mechanism for a subsequent paid offering. General requirements under the Draft Offering Regulation remain fully applicable.

Law stated - 1 March 2026

Advertising and marketing

What laws and regulations govern the advertising and marketing of cryptoassets used for investment and financing?

Advertising for cryptoasset investment and financing is governed by the specific provisions of the Draft Offering Regulation, alongside the general consumer protection principles in OJK Reg. 27/2024 for the trading ecosystem of cryptoassets, as well as the consumer protection framework administered by the OJK.

The Draft Offering Regulation imposes key distinct obligations on issuers and licensed traders during the offering phase:

- **Initial information requirement:** During the announcement stage, issuers and traders must provide "Initial Information", which includes details on, among others, the issuer, price, supply and offering period.
- **Consistency:** All marketing materials and initial Information must be strictly consistent with the information document (white paper) that has been submitted to and approved by the OJK.
- **Accuracy and non-misleading:** Information must be correct, not misleading, and compliant with applicable law, at minimum: (1) transparent to consumers; (2) include a risk and price volatility warning; (3) not indicate or create the impression that investing will yield high and certain returns; (4) not create a "fear of loss" assumption if consumers do not buy immediately; and (5) not suggest purchase of digital assets using debt in any form.
- **Language:** As a general Indonesian consumer and contracting practice, marketing materials targeting Indonesian consumers must be in the Indonesian language.

Law stated - 1 March 2026

Trading restrictions

Are investors in an ICO/STO/stablecoin subject to any restrictions on their trading after the initial offering?

Cryptoassets may only be traded on locally licensed platforms after being admitted to the official Digital Financial Asset List (Whitelist) maintained by the Exchange and verified by the OJK. Assets that fail to meet ongoing eligibility, security or compliance criteria may be suspended or delisted. There are no statutory lock-up periods imposed on investors by law.

Law stated - 1 March 2026

Crowdfunding

How are crowdfunding and cryptoasset offerings treated differently under the law?

Yes, they are treated differently. Equity Crowdfunding is regulated under OJK Regulation No. 17 of 2025 on Securities Offerings via Information Technology-based Equity Crowdfunding Services for Equity Crowdfunding. The offerings involve the issuance of securities (equity or sukuk) through locally licensed platforms, with ownership recorded at the central securities depository. Cryptoasset offerings operate under the Digital Financial Asset framework, particularly, under the Draft Offering Regulation.

Law stated - 1 March 2026

Transfer agents and share registrars

What laws and regulations govern cryptoasset transfer agents and share registrars?

In the cryptoasset ecosystem, the functions of transfer agents and registrars are performed by the depository manager, which is a regulated entity under OJK Reg. 27/2024.

Depository managers are responsible for:

- custody and safekeeping of cryptoassets;
- management of private keys;
- accurate recording of ownership; and
- secure transfer of assets.

These entities are subject to stringent capital, governance and technology risk management requirements.

Law stated - 1 March 2026

Anti-money laundering and know-your-customer compliance

What anti-money laundering (AML) and know-your-customer (KYC) requirements and guidelines apply to the offering of cryptoassets?

OJK Reg. 27/2024 imposes comprehensive AML/KYC obligations on licensed traders.

Customer due diligence (CDD)

Traders must verify the identity of all customers using "regulatory technology" that includes face recognition with liveness detection, and connected to population administration data held by the domestic affairs ministry.

Travel Rule

The regulation imposes a mandatory travel rule for asset transfers. For transfers valued at US\$1,000 or more, the originating trader must transmit detailed beneficiary and originator information to the beneficiary trader. The required information includes originator name, wallet address, address and identity documentation. For transfers under US\$1,000, basic information, such as names and wallet addresses, is required.

Enhanced due diligence (EDD)

Onboarding data must be used as guidance to perform CDD or enhanced due diligence for high-risk consumers.

Law stated - 1 March 2026

Sanctions and Financial Action Task Force compliance

What laws and regulations apply in the context of cryptoassets to enforce government sanctions, anti-terrorism financing principles, and Financial Action Task Force (FATF) standards?

Indonesia enforces FATF standards through Law No. 8 of 2010 on the Prevention and Eradication of Money Laundering Criminal Offence and Law No. 9 of 2013 on Prevention and Eradication of Terrorism Funding.

OJK Reg. 27/2024 specifically mandates that licensed operators under the ecosystem must report every suspicious financial transaction to the head of the Indonesian Financial Transaction Reports and Analysis Center, and must also submit other reports required under the applicable laws and regulations on AML, counter-terrorism financing, and proliferation-financing prevention. Non-compliance may result in administrative sanctions, such as warnings, administrative fines where applicable, suspension of activities and/or licence revocation, depending on the breached provision.

Law stated - 1 March 2026

CRYPTOASSET TRADING

Fiat currency transactions

What rules and restrictions govern the exchange of fiat currency and cryptoassets?

The cryptoasset trading ecosystem is regulated under Financial Services Authority (OJK) Reg. 27/2024. The exchange of fiat currency for cryptoassets (on-ramp) and vice versa (off-ramp) must be conducted through a licensed trader.

Law stated - 1 March 2026

Exchanges and secondary markets

Where are investors allowed to trade cryptoassets? How are exchanges, alternative trading systems and secondary markets for cryptoassets regulated?

The cryptoasset trading ecosystem is regulated under OJK Reg. 27/2024. The exchange of fiat currency for cryptoassets (on-ramp) and vice versa (off-ramp) must be conducted through a licensed trader.

Law stated - 1 March 2026

Custody

| How are cryptoasset custodians regulated?

Cryptoasset custody is a licensed and regulated activity performed by depository managers under the OJK Reg. 27/2024 framework. Key requirements are as follows:

- The depository manager must be a separate legal entity from the trader to ensure independent verification of assets.
- Minimum paid-up capital is 250 billion rupiah. Depository managers must maintain equity of at least 80% of its paid-up capital.
- Depository managers must implement strict security protocols. A licensed trader may store cryptoassets itself only up to 30% of total consumer cryptoassets, whereas the remainder must be stored at a depository manager.

Law stated - 1 March 2026

| Broker-dealers

| How are cryptoasset broker-dealers regulated?

Entities performing broker-dealer functions are licensed as "traders" under OJK Reg. 27/2024. Key regulatory requirements include:

- Traders are authorised to conduct trading activities in the digital financial asset market, including facilitating consumer trades through its electronic trading system that is connected to the wider market infrastructure (exchange and other relevant organisers), in accordance with the applicable trading mechanism and rules.
- Minimum paid-up capital is 100 billion rupiah. They are also subject to ongoing equity maintenance of at least 50 million rupiah.

Law stated - 1 March 2026

| Decentralised exchanges

| What is the legal status of decentralised cryptoasset exchanges?

Decentralised exchanges are not recognised as lawful market operators under Indonesian law.

The regulatory framework requires that any entity facilitating cryptoasset trading:

- be incorporated as an Indonesian limited liability company (PT);
- hold the appropriate OJK licence; and
- maintain accountable management and compliance functions.

A decentralised exchange (DEX), typically run via smart contracts, DAOs or non-identifiable operators cannot satisfy these requirements. Indonesian regulations do not expressly prohibit individuals from accessing decentralised protocols. However, any DEX or related party that actively facilitates, promotes, markets or solicits cryptoasset trading services to Indonesian users may be deemed to be conducting unauthorised cryptoasset trading

activities in Indonesia. Such activities may expose the relevant parties to regulatory enforcement measures, including website blocking and other administrative sanctions by the competent authorities.

Law stated - 1 March 2026

Peer-to-peer exchanges

What is the legal status of peer-to-peer (person-to-person) transfers of cryptoassets?

A direct wallet-to-wallet transfer between two individuals for non-commercial purposes is permitted as a private transfer of personal property. Nonetheless, operating a peer-to-peer (P2P) exchange platform where the operator matches buyers and sellers or provides escrow services, constitutes operating a market. This requires a licence as a trader as per the OJK Reg. 27/2024. Unlicensed P2P platforms are considered illegal exchanges and may be subject to blocking by the government.

Law stated - 1 March 2026

Trading with anonymous parties

Does the law permit trading cryptoassets with anonymous parties?

No, anonymous trading is strictly prohibited. The regulatory regime under OJK Reg. 27/2024 mandates full transparency of identity to combat money laundering. Licensed traders must perform KYC/CDD on every user before allowing them to trade.

Law stated - 1 March 2026

Foreign exchanges

Are foreign cryptocurrency exchanges subject to your jurisdiction's laws and regulations governing cryptoasset exchanges?

Foreign cryptoasset exchanges would be subject to Indonesian law if they conduct business in Indonesia or actively solicit Indonesian customers. Indonesian regulations have territorial effect based on the concept of "factually doing business". If a foreign exchange actively markets to Indonesians, or use the Indonesian language on its website, or facilitates IDR payments, it is deemed to be operating onshore and must obtain a local licence which requires establishing a local entity (a PT).

Law stated - 1 March 2026

Foreign exchanges

Under what circumstances may a citizen of your jurisdiction lawfully exchange cryptoassets on a foreign exchange?

Indonesian law does not expressly regulate the ability of individuals to exchange cryptoassets on foreign trading platforms. Vis-à-vis Indonesian residents, there is currently no statutory prohibition preventing them from accessing or using overseas cryptoasset exchanges.

That said, cryptoasset trading within Indonesia is subject to domestic regulatory oversight that primarily governs onshore trading platforms and does not purport to restrict individual ownership or trading of cryptoassets through offshore exchanges. Indonesian individuals are generally permitted to hold assets abroad, including cryptoassets, provided that such holdings are duly reported for Indonesian tax purposes in accordance with applicable tax laws and regulations.

Law stated - 1 March 2026

Taxes

Do any tax liabilities arise in the exchange of cryptoassets (for both other cryptoassets and fiat currencies)?

Yes. Following the reclassification of cryptoassets to the financial sector, the tax regime is as follows:

Income Tax (PPH)

Sellers of cryptoassets on licensed local exchanges are subject to a final income tax of 0.21% on the transaction value. If traded on non-compliant or unlicensed platforms (including, foreign exchanges) that do not meet the criteria under Indonesian regulations, the applicable final income tax rate increases to 0.42%, or the seller may be required to self-assess and remit Income Tax at the applicable rate in accordance with Regulation of the Minister of Finance No. 50 of 2025 on the Tax Treatment of Crypto Asset Transactions (PMK 50/2025).

VAT (PPN)

Historically, VAT applied to cryptoasset transactions under the commodity regime. Following the reclassification of cryptoassets into the financial sector, VAT treatment is undergoing regulatory and policy realignment.

Under PMK 50/2025, cryptoassets themselves are no longer treated as taxable goods for VAT purposes. Accordingly, the transfer or exchange of cryptoassets is not subject to VAT. However, VAT remains applicable to services related to cryptoasset transactions, including services provided by trading platform services and verification or mining services, in accordance with the general VAT regime. The VAT obligation rests with the relevant service providers, who are required to collect (where applicable), remit, and report VAT in accordance with applicable laws.

Law stated - 1 March 2026

CRYPTOASSETS USED FOR PAYMENTS

Government-recognised assets

Has the government recognised any cryptoassets as a lawful form of payment or issued its own cryptoassets?

No. Indonesia does not recognise any cryptoassets as a lawful means of payment. Under Indonesian law, rupiah (IDR) is the sole legal tender within the territory of the Republic of Indonesia, and all payment transactions conducted in Indonesia are, in principle, required to be denominated in IDR.

Indonesia has not issued or recognised any privately issued cryptoasset for payment purposes. However, through amendments introduced by Law 4/2023, which amended Law No. 7 of 2011 on Currency, Indonesia has formally recognised IDR as comprising paper rupiah, coin rupiah and digital rupiah.

The digital rupiah constitutes a central bank digital currency issued by Bank Indonesia. The issuance, circulation, governance and supervision of the digital rupiah are to be further regulated by Bank Indonesia regulations. As of the date hereof, the detailed implementing regulations governing the digital rupiah have not yet been promulgated.

Law stated - 1 March 2026

Bitcoin

Does Bitcoin have any special status among cryptoassets?

No. Legally, bitcoin holds no special status compared to other cryptoassets. It is classified as a Digital Financial Asset or Utility Crypto Asset suitable for investment but has no currency or legal tender status. It is, however, included in the Exchange's Whitelist of tradeable assets.

Law stated - 1 March 2026

Banks and other financial institutions

Do any banks or other financial institutions allow cryptocurrency accounts?

Under the payment system regime, particularly, Bank Indonesia Regulation No. 10 of 2025 on the Payment System Industry, Indonesian banks as well as other non-bank payment services providers are prohibited from offering "crypto accounts" directly to customers or holding cryptoassets on their own balance sheets as proprietary assets.

Any involvement in cryptocurrency trading or custody must be conducted only in compliance with the relevant regulatory framework established by the competent authorities. Accordingly, banks play a crucial supporting role in the crypto ecosystem. They are permitted, and in fact required, to provide segregated fiat bank accounts to licensed traders and clearinghouses to facilitate the fiat settlement of crypto trades. The segregated account may only be opened at a bank that has a Financial Services Authority (OJK) business licence. All such banking activities are conducted strictly in IDR and under Bank Indonesia and OJK supervision.

CRYPTOCURRENCY MINING

Legal status

What is the legal status of cryptocurrency mining activities?

As of today, Indonesian law does not provide a specific regulatory framework governing cryptocurrency mining activities. It is generally not characterised as a financial service activity and, accordingly, does not fall within the supervisory jurisdiction of OJK. Mining activities are typically treated as a form of technological or industrial data processing and computing infrastructure, depending on the operational model, and subject to general business, industry and energy regulations.

At present, cryptocurrency mining activities are not subject to any dedicated licensing or approval regime under Indonesian law.

Law stated - 1 March 2026

Government views

What views have been expressed by government officials regarding cryptocurrency mining?

The government's view is generally neutral, provided miners operate legally, that they are properly registered as businesses, comply with electricity usage regulations and/or do not misuse subsidised energy.

Public concerns expressed notably have focused primarily on: electricity consumption, particularly the misuse of subsidised electricity intended for households or small businesses, as well as environmental impact, including encouragement to utilise renewable or surplus energy sources.

There is no general policy opposition to mining as an activity, and mining operations are permitted where conducted transparently and in compliance with applicable regulations.

Law stated - 1 March 2026

Cryptocurrency mining licences

Are any licences required to engage in cryptocurrency mining?

There is no specific "crypto mining licence" issued by the Financial Services Authority or other financial regulators.

However, mining operators must generally follow the following steps:

- obtain a Business Identification Number through the Online Single Submission system;
-

select the appropriate Indonesian Standard Industrial Classification corresponding to its business activities data processing, hosting or related IT services; and

- comply with general business licensing, zoning and environmental requirements, where applicable.
- in addition, mining operations must comply with electricity supply agreements with licensed power providers and regulations prohibiting the use of subsidised electricity for commercial mining activities.

Law stated - 1 March 2026

Taxes

How is the acquisition of cryptocurrency by cryptocurrency mining taxed?

Income generated from mining is treated as standard business income or personal income. Such income is subject to the general income tax regime under Indonesian law, namely corporate income tax at the prevailing rate (currently approximately 22%) for corporate taxpayers or progressive personal income tax rates (up to 35%) for individual taxpayers. In line with general tax principles, miners may deduct reasonable and directly related operating expenses, including but not limited to hardware depreciation, electricity costs and other operational expenditures, in determining taxable income.

Law stated - 1 March 2026

BLOCKCHAIN AND OTHER DISTRIBUTED LEDGER TECHNOLOGIES

Node licensing

Are any licences required to operate a blockchain/DLT node?

Generally, no, operating a node for the purpose of technical validation or network support is considered a technological activity and not a regulated financial service.

However, licensing obligations may arise based on the functions performed by the node operator rather than the mere operation of the node. Specifically, if a node operator:

- controls or safeguards third-party cryptoassets;
- facilitates or intermediates transactions between third parties; or
- operates as part of a trading, custody or settlement service offered to the public,

then the operator may fall within the regulated definitions of a trader, depository manager, as the case may be, and licensing requirements would apply accordingly.

Under Government Regulation No. 28 of 2025 on the Implementation of Risk-Based Business Licensing, blockchain activities are formally recognised as legitimate business activities. Business actors undertaking non-financial blockchain projects must obtain an NIB and comply with applicable technical or industry-specific certifications. Conversely, blockchain projects involving regulated financial activities, including but not limited to cryptoasset

trading, custody or settlement, are subject to mandatory licensing and supervision by the Financial Services Authority (OJK).

Law stated - 1 March 2026

Restrictions on node operations

Is the operation of a blockchain/DLT node subject to any restrictions?

There are no explicit restrictions on running a node for private use. However, regulated entities (ie, crypto exchanges, traders) that run nodes as part of their infrastructure must ensure these nodes comply with the IT risk requirements, cybersecurity and data protection, as well as AML/CFT/FATF requirements under the OJK Reg. 27/2024.

Nodes that are purely technical and not linked to regulated financial services are not subject to sanctions screening or know your customer obligations.

Law stated - 1 March 2026

DAO liabilities

What legal liabilities do the participants in a decentralised autonomous organisation (DAO) have?

As of the date hereof, Indonesian law does not recognise decentralised autonomous organisations (DAOs) as legal entities, such as a limited liability company (PT). Consequently, a DAO lacks separate legal personality, and its participants cannot invoke the protection of limited liability. Accordingly, participants may be held personally liable for any obligations, debts or other liabilities arising from the DAO's operations or activities.

Law stated - 1 March 2026

DAO assets

Who owns the assets of a DAO?

Since a DAO lacks legal personality, it cannot own property in its own name. Assets held in a DAO treasury are likely legally viewed as joint property of the members or participants, or assets held by specific individuals or entities who control the private keys, acting as de facto custodians.

If the private keys to a DAO treasury are held by a "multisig" committee (the treasury assets are controlled through a multisignature arrangement), the signatories may be regarded as having fiduciary responsibilities and may incur personal liability for loss, misuse or misappropriation of assets.

Law stated - 1 March 2026

Open source

Is DLT based on open-source protocols or software treated differently under the law than private DLT?

No distinction is made in the financial regulations between open-source (public) and private (permissioned) blockchains. Regulatory treatment is determined by the activity performed or the use-case, rather than the licensing model of the underlying software.

Both open source and private DLT are subject to the same standards of security, auditability and consumer protection if used for regulated financial services.

Law stated - 1 March 2026

Smart contracts

Are smart contracts legally enforceable?

Yes, smart contracts can be legally recognised and enforceable under Indonesian law, provided they meet the general legal requirements for valid agreements and, where applicable, the specific standards required by relevant sectoral regulations.

In fact, Law 4/2023 recognises the use of smart contracts within regulated financial markets, including capital markets, money markets and foreign exchange markets, permitting such contracts to be used as legal evidence in those contexts.

Under Law No. 11 of 2008 on Electronic Information and Transactions, as lastly amended by Law No. 1 of 2024, smart contracts would qualify as electronic contracts. Their enforceability depends on compliance with the four fundamental requirements of contract validity under the Indonesian Civil Code, that is:

- mutual consent of the parties;
- legal capacity to contract;
- a specific and identifiable subject matter; and
- a lawful cause.

Accordingly, smart contracts that comply with the requisites of both Indonesian contract principles under the Civil Code, and other relevant laws, will be recognised as legally enforceable and admissible evidence before Indonesian courts and regulators. Enforcement in practice may require interpretation of the contract's natural-language framework and performance coded in software, and may also depend on dispute resolution clauses and applicable choice-of-law principle.

Nevertheless, a smart contract that executes an unlawful transaction or is used to circumvent mandatory legal requirements would be void or unenforceable, notwithstanding its technical execution.

Law stated - 1 March 2026

Patents

| Can blockchain/DLT technology be patented?

Under Indonesian law, blockchain or DLT technology is not categorically excluded from patent protection. Law No. 13 of 2016 on Patents (the Patents Law) protects inventions that are novel, involve an inventive step and are industrially applicable, provided that such inventions constitute technical solutions to problems in the field of technology.

The Patents Law defines an invention as an idea of an inventor embodied in a specific problem-solving activity in the technological domain. Blockchain technology, which operates through cryptographic mechanisms, distributed data structures and digital information-processing systems, clearly falls within the broader field of digital and computer-implemented technology. Accordingly, a blockchain-based solution may qualify as a patentable invention where it is formulated as a concrete technical solution rather than as an abstract concept, business method or mathematical scheme.

While Indonesian regulations on business licensing and technology development increasingly recognise blockchain as a distinct area of technological activity, such regulatory treatment is not determinative of patentability. Rather, it reinforces the understanding that blockchain operates within the technological sphere, thereby supporting, though not replacing, the application of the standard patentability tests under the Patents Law.

On this basis, Indonesian law contains no general prohibition against patenting blockchain or DLT-related inventions. Patent eligibility is assessed on a case-by-case basis, subject to compliance with the established requirements of novelty, inventive step and industrial applicability.

Law stated - 1 March 2026

UPDATE AND TRENDS

Recent developments

Are there any emerging trends, notable rulings or hot topics related to cryptoassets or blockchain in your jurisdiction?

The offering regime

The impending finalisation of the Draft Offering Regulation represents a fundamental evolution in Indonesia's regulatory approach. The country is transitioning from a jurisdiction that historically permitted only secondary trading of cryptoassets to one that will expressly authorise:

- regulated cryptoasset offerings;
- tokenised asset issuance; and
- stablecoin issuance,

under a clear licensing and disclosure regime. This is expected to unlock new use cases, particularly for institutional and enterprise-led projects.

Increase enforcement against unlicensed foreign platforms

Regulatory enforcement against unlicensed offshore crypto platforms has intensified. The Financial Services Authority, in coordination with the Ministry of Communication and Digital Affairs, has:

- actively blocked access to foreign crypto exchange websites and/or apps; and
- publicly warned consumers against using unlicensed platforms.

This trend underscores the regulator's commitment to territorial enforcement and consumer protection.

Continued prohibition on crypto payments and progress in CBDC development

There is no indication that Indonesian authorities will permit cryptoassets as a means of payment. Concurrently, Bank Indonesia's Digital Rupiah initiative continues to advance, emphasising the government's position that innovations in payment systems will occur exclusively through the Central Bank Digital Currency (CBDC) and that privately issued cryptoassets will remain restricted to investment and trading purposes.

Law stated - 1 March 2026