

# Regional Round-Up 2024: Indonesia



---

# Contents

|                              |           |
|------------------------------|-----------|
| <b>Introduction</b>          | <b>3</b>  |
| <b>Looking Back: 2024</b>    | <b>4</b>  |
| <b>Gazing Into: 2025</b>     | <b>6</b>  |
| <b>Key Contacts</b>          | <b>8</b>  |
| <b>Our Regional Contacts</b> | <b>10</b> |
| <b>Disclaimer</b>            | <b>11</b> |

# Introduction

Throughout the year, we have been keeping you up to date on noteworthy developments across the region with our Regional Round-up Publications. As we enter 2025, we are pleased to share with you our *2024 year-in-review of the Regional Round-up* for our Regional Offices in the Rajah & Tann Asia network.

In each jurisdiction, we recount the key milestones in the path that has been travelled in 2024, as well as consider the terrain of the road that lies ahead in 2025. In the "**Looking Back: 2024**" section, we take stock of the past year and highlight the key legal and regulatory developments affecting each jurisdiction in 2024. In the "**Gazing Into: 2025**" section, we look ahead to some key areas of development that you should take note of in the year to come, referencing the legal and business trends shaping up potential legislative and regulatory changes in each jurisdiction.

We hope that this year-in-review edition of the Regional Round-up provides some perspective and insight into the legal landscape of the jurisdictions across the region. As always, please feel free to contact our lawyers in our Regional Offices if you have any queries or for further discussions.

Please click on the links below to access the full collection of our country-specific *2024 year-in-review of the Regional Round-up*:

- [Cambodia](#)
- [China](#)
- [Indonesia](#)
- [Laos](#)
- [Malaysia](#)
- [Myanmar](#)
- [Philippines](#)
- [Singapore](#)
- [Thailand](#)
- [Vietnam](#)

## Looking Back: 2024

The year 2024 brought pivotal developments across Indonesia's legal landscape, impacting key sectors such as **energy, financial markets, and corporate compliance**. Regulatory advancements addressed **carbon capture and storage frameworks, stock exchange delisting and relisting processes, mandatory legal audits, and local content policies in electricity infrastructure**. These updates highlight Indonesia's commitment to enhancing governance, transparency, and sustainability while fostering domestic and international investments.



Summaries of the key developments relating to the above areas are provided below.

### Energy & Resources – Indonesia's Carbon Capture and Storage Regulatory Overview: Steps to become Asia-Pacific Hub?

Indonesia's new regulations on carbon capture and storage ("**CCS**") establish a comprehensive framework for its implementation in production sharing contract (PSC) blocks and designated CCS areas. Key aspects include integration with petroleum operations, tender processes, and clarity on business processes, taxation incentives, and liability. However, further elaboration is needed on royalties, bilateral cooperation, and post-monitoring liabilities to attract investments and build a successful CCS hub. Click [here](#) for more information.

### Capital Markets – Understanding the Latest Changes in IDX's Delisting and Relisting Rule

The Indonesia Stock Exchange (IDX) introduced Regulation No. I-N to enhance transparency and accountability in delisting and relisting shares and debt instruments. It mandates announcements for potential delistings, stricter penalties, and detailed disclosure requirements, especially regarding share buybacks. Despite these advances, uncertainties remain about sukuk holders and the trading status of delisted debt instruments, signaling the need for further clarity. Click [here](#) for more information.

### Corporate & Commercial – Mandatory Legal Audit is Set to Shake Business Practice

A draft Presidential Regulation on Legal Compliance mandates annual legal audits for businesses, legal entities, and public institutions, aiming to improve adherence to laws and governance practices. Certified legal auditors will assess compliance and provide formal reports, with oversight from the Ministry of Law and Human Rights. This marks a significant shift towards strengthening legal compliance, but effective implementation will require adequate resources and monitoring. Click [here](#) for more information.

### Energy & Resources – Powering Indonesia: How the New Local Content Policy Will Benefit Electricity Infrastructure

The Government's new local content policy under Regulation No. 11 of 2024 reduces local content thresholds for power plants and introduces exemptions for projects funded by offshore loans or grants. It fosters

domestic manufacturing and investment in renewable energy while ensuring compliance through independent verification processes. These changes reflect Indonesia's efforts to balance international financing with local economic growth and energy sustainability. Click [here](#) for more information.

# Gazing Into: 2025

Indonesia's regulatory landscape in 2025 will see significant changes across **energy, data privacy, and public health sectors**. Key updates include the draft **National Energy Policy** targeting renewable energy growth, the **Personal Data Protection Regulation** on data privacy, and **stricter tobacco control measures** under Government Regulation No. 28 of 2024. Businesses must adapt to these shifts to ensure compliance and capitalise on emerging opportunities.

### Energy & Resources – Draft Government Regulation on National Energy Policy ("RPP KEN")

Indonesia's energy transition in 2025 faces challenges, including reduced renewable energy targets (17-19% by 2025), regulatory uncertainty, and an annual funding gap of US\$7 billion. The draft



RPP KEN aims to achieve net-zero emissions by 2060 through strategies like a 70%-72% renewable energy mix, decarbonisation funding, and implementing 13.3 GW of renewable energy projects. Business actors must monitor these developments closely to adapt to regulatory changes, leverage opportunities in carbon trading and renewable energy, and mitigate risks in alignment with Indonesia's energy transition goals.

### Energy & Resources – Draft Government Regulation on National Energy Policy ("RPP KEN")

Indonesia's energy transition in 2025 faces challenges, including reduced renewable energy targets (17-19% by 2025), regulatory uncertainty, and an annual funding gap of US\$7 billion. The draft RPP KEN aims to achieve net-zero emissions by 2060 through strategies like a 70%-72% renewable energy mix, decarbonisation funding, and implementing 13.3 GW of renewable energy projects. Business actors must monitor these developments closely to adapt to regulatory changes, leverage opportunities in carbon trading and renewable energy, and mitigate risks in alignment with Indonesia's energy transition goals.

### Data Protection – Draft Government Regulation on Personal Data Protection ("RPP PDP")

The draft RPP PDP, an implementing regulation for Law No. 27 of 2022 (PDP Law), is undergoing harmonisation at the Ministry of Law and Human Rights. Comprising 245 articles, it addresses key aspects such as data scope, processing principles, overseas transfers, the authority of PDP agencies, administrative sanctions, and dispute resolution. Businesses must proactively review and update their practices to ensure compliance, as adopting a "wait and see" approach could lead to operational disruptions, non-compliance risks, and penalties once the regulation is enacted. Click [here](#) for more information.

### Corporate & Commercial –Response to Government Regulation No. 24 of 2024 as the Implementing Regulation of Law No. 17 of 2023 on Health

Government Regulation No. 28 of 2024 updates Indonesia's tobacco control framework, expanding its scope to include e-cigarettes and heated tobacco products with stricter rules on nicotine and tar limits,

packaging standards, and online advertising. Key measures include raising the minimum purchasing age to 21, banning single-stick sales, mandating health warnings, and requiring age verification for online sales and advertisements. Businesses must comply with these updated regulations by 26 July 2025, including revising operations and ensuring adherence to stricter standards to avoid penalties. Click [here](#) for more information.

## Key Contacts



Ibrahim Sjarief Assegaf

MANAGING PARTNER

T +62 21 2555 7825  
[ibrahim.asegaf@ahp.id](mailto:ibrahim.asegaf@ahp.id)



Ahmad Fikri Assegaf

CO-FOUNDER / SENIOR PARTNER

T +62 21 2555 7880  
[ahmad.asegaf@ahp.id](mailto:ahmad.asegaf@ahp.id)



Bono Daru Adji

SENIOR PARTNER

T +62 21 2555 7878  
[bono.adji@ahp.id](mailto:bono.adji@ahp.id)



Chandra M. Hamzah

CO-FOUNDER / SENIOR PARTNER

T +62 21 2555 7880  
[chandra.hamzah@ahp.id](mailto:chandra.hamzah@ahp.id)



Eri Hertiawan

SENIOR PARTNER

T +62 21 2555 7883  
[eri.hertiawan@ahp.id](mailto:eri.hertiawan@ahp.id)



Eko Ahmad Ismail Basyuni

PARTNER

T +62 21 2555 7802  
[eko.basyuni@ahp.id](mailto:eko.basyuni@ahp.id)



HMBC Rikrik Rizkiyana

PARTNER

T +62 21 2555 7855  
[rikrik.rizkiyana@ahp.id](mailto:rikrik.rizkiyana@ahp.id)



Farid Fauzi Nasution

PARTNER

T +62 21 2555 9998  
[farid.nasution@ahp.id](mailto:farid.nasution@ahp.id)



Kanya Satwika

PARTNER

T +62 21 2555 7807  
[kanya.satwika@ahp.id](mailto:kanya.satwika@ahp.id)



Indira Yustikania

PARTNER

T +62 21 2555 7829  
[indira.yustikania@ahp.id](mailto:indira.yustikania@ahp.id)

---

## Regional Round-Up 2024: Indonesia

---



**Putu Suryastuti**

**PARTNER**

**T +62 21 2555 7810**

[putu.suryastuti@ahp.id](mailto:putu.suryastuti@ahp.id)



**Nazly Parlindungan Siregar**

**HEAD, TAX**

**T +62 21 2555 9952**

[nazly.siregar@ahp.id](mailto:nazly.siregar@ahp.id)

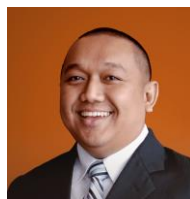


**Dewi Kamaratih Soeharto**

**CO-HEAD, INTELLECTUAL PROPERTY  
PARTNER**

**T +62 21 2555 7891**

[dewi.soeharto@ahp.id](mailto:dewi.soeharto@ahp.id)



**Ahmad Maulana**

**PARTNER**

**T +62 21 2555 7816**

[ahmad.maulana@ahp.id](mailto:ahmad.maulana@ahp.id)



**Yogi Sudrajat Marsono**

**CO-HEAD, SURABAYA OFFICE  
CO-HEAD, REAL ESTATE**

**T +62 21 2555 7812**

[yogi.marsono@ahp.id](mailto:yogi.marsono@ahp.id)

---

Please feel free to also contact Knowledge Management at [RTApublications@rajahtann.com](mailto:RTApublications@rajahtann.com).

## Our Regional Contacts

### Cambodia

Rajah & Tann Sok & Heng Law Office

T +855 23 963 112 / 113  
F +855 23 963 116  
kh.rajahtannasia.com

### Myanmar

Rajah & Tann Myanmar Company Limited

T +951 9253750  
mm.rajahtannasia.com

### China

Rajah & Tann Singapore LLP  
Shanghai & Shenzhen Representative Offices

T +86 21 6120 8818  
F +86 21 6120 8820  
cn.rajahtannasia.com

### Philippines

Gatmaytan Yap Patacsil Gutierrez & Protacio  
(C&G Law)

T +632 8248 5250  
www.cagatlaw.com

### Indonesia

Assegaf Hamzah & Partners

#### Jakarta Office

T +62 21 2555 7800  
F +62 21 2555 7899

#### Surabaya Office

T +62 31 5116 4550  
F +62 31 5116 4560  
www.ahp.co.id

### Singapore

Rajah & Tann Singapore LLP

T +65 6535 3600  
sg.rajahtannasia.com

### Thailand

Rajah & Tann (Thailand) Limited

T +66 2 656 1991  
F +66 2 656 0833  
th.rajahtannasia.com

### Lao PDR

Rajah & Tann (Laos) Co., Ltd.

T +856 21 454 239  
F +856 21 285 261  
la.rajahtannasia.com

### Vietnam

Rajah & Tann LCT Lawyers

#### Ho Chi Minh City Office

T +84 28 3821 2382 / +84 28 3821 2673  
F +84 28 3520 8206

### Malaysia

Christopher & Lee Ong

T +60 3 2273 1919  
F +60 3 2273 8310  
www.christopherleeong.com

#### Hanoi Office

T +84 24 3267 6127 / +84 24 3267 6128  
www.rajahtannlct.com

Rajah & Tann Asia is a network of legal practices based in Asia.

Member firms are independently constituted and regulated in accordance with relevant local legal requirements. Services provided by a member firm are governed by the terms of engagement between the member firm and the client.

This update is solely intended to provide general information and does not provide any advice or create any relationship, whether legally binding or otherwise. Rajah & Tann Asia and its member firms do not accept, and fully disclaim, responsibility for any loss or damage which may result from accessing or relying on this update.

# Disclaimer

Rajah & Tann Asia is a network of member firms with local legal practices in Cambodia, Indonesia, Lao PDR, Malaysia, Myanmar, the Philippines, Singapore, Thailand and Vietnam. Our Asian network also includes our regional office in China as well as regional desks focused on Brunei, Japan and South Asia. Member firms are independently constituted and regulated in accordance with relevant local requirements.

The contents of this publication are owned by Rajah & Tann Asia together with each of its member firms and are subject to all relevant protection (including but not limited to copyright protection) under the laws of each of the countries where the member firm operates and, through international treaties, other countries. No part of this publication may be reproduced, licensed, sold, published, transmitted, modified, adapted, publicly displayed, broadcast (including storage in any medium by electronic means whether or not transiently for any purpose save as permitted herein) without the prior written permission of Rajah & Tann Asia or its respective member firms.

Please note also that whilst the information in this publication is correct to the best of our knowledge and belief at the time of writing, it is only intended to provide a general guide to the subject matter and should not be treated as legal advice or a substitute for specific professional advice for any particular course of action as such information may not suit your specific business and operational requirements. You should seek legal advice for your specific situation. In addition, the information in this publication does not create any relationship, whether legally binding or otherwise. Rajah & Tann Asia and its member firms do not accept, and fully disclaim, responsibility for any loss or damage which may result from accessing or relying on the information in this publication.