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KYC / KYB / AML

2026 EDITION

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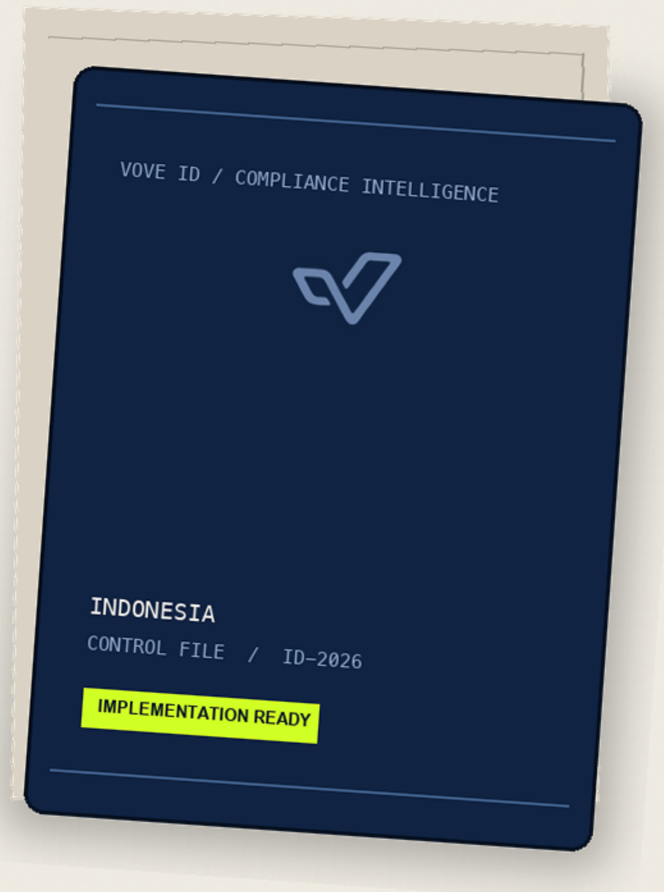

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Indonesia KYC, KYB & AML Compliance Checklist

An implementation checklist for Indonesia's customer due diligence, beneficial ownership, transaction reporting, targeted financial sanctions, payments, digital assets and personal-data requirements.

FIU	**Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK / INTRAC)**
Primary AML law	**Law No. 8 of 2010, preventive and reporting provisions as in force**
Suspicious report	**To PPATK as soon as possible, no later than 3 working days after a financial service provider knows the suspicious elements**
Cash report	**Financial-service cash transaction at least IDR 500 million, single or aggregated in 1 working day; generally within 14 working days, subject to exceptions**
CDD trigger	**Business relationship; at least IDR 100 million; suspicion; or doubt, subject to sector rules**
Records	**Generally at least 5 years, with the start event depending on record type**
Privacy breach	**Written notice within 3 x 24 hours to affected subjects and the statutory institution**
FATF public lists	**Not listed at 19 June 2026; FATF member since 2023**

Scope and legal framework

The preventive and reporting provisions of Law No. 8 of 2010, Law No. 9 of 2013, Government Regulation No. 43 of 2015 as amended, OJK Regulation No. 8 of 2023 and Bank Indonesia Regulation No. 10 of 2024 form the core AML/CFT/CPF framework. Sector, profession, payment and digital-asset rules determine the exact perimeter.

FATF context

Indonesia has been a FATF member since 2023 and was absent from the FATF increased-monitoring and call-for-action lists dated 19 June 2026. FATF's 3 June 2026 follow-up reports 7 Recommendations compliant, 30 largely compliant and 3 partially compliant. Absence from a public list is not a low-risk classification.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 25 September 2026. Confirm the reporting-party perimeter, current PPATK reporting schema, OJK or Bank Indonesia licence, professional overlay, sanctions lists, PDP implementing position and digital-asset classification with the competent authority and qualified Indonesian counsel before launch.

HOW TO USE THIS GUIDE

Turn each requirement into owned evidence

For every row, assign an owner, confirm whether the control applies, link the evidence, record gaps, and set a remediation date. A checked box is not evidence by itself.

01 / SCOPE	02 / DESIGN	03 / EVIDENCE	04 / REVIEW
Confirm institution, supervisor, product, customer and risk scope.	Map each obligation to a policy, system control or human review.	Retain the document, decision, timestamp, owner and rationale.	Test the control and update it when rules or risks change.

Checklist legend

CONTROL tells you what outcome to cover. IMPLEMENTATION ACTION translates that outcome into operational work. EVIDENCE suggests what an auditor or reviewer should be able to inspect. SOURCE points back to the primary rule or regulator guidance.

Minimum review record

Keep a compact decision record for each checklist row so a later reviewer can reconstruct what applied, who decided, and what evidence was inspected.

APPLICABILITY	OWNERSHIP	TRACEABILITY
Applicable, not applicable, or pending legal confirmation, with a short rationale.	Named control owner, reviewer, approval date and next review date.	Evidence link, source version, test result, gap status and remediation ticket.

1. SCOPE, AUTHORITIES, AND LICENSING

Scope, authorities, and licensing

Classify the entity, service and supervisor before applying a control or threshold.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether the entity is a reporting party.	Map each financial, payment, goods, professional and digital-asset activity to Law No. 8 of 2010 and Government Regulation No. 43 of 2015 as amended by Government Regulation No. 61 of 2021; record the competent supervisor and PPATK reporting route.	Legal perimeter memo, product and funds-flow map, reporting-party category, supervisor confirmation and approved scope decision.	Law No. 8 of 2010, Article 17; Government Regulation No. 43 of 2015 as amended by Government Regulation No. 61 of 2021
Obtain the correct OJK or Bank Indonesia authority before service.	Map regulated financial services to OJK and payment-system, remittance or non-bank money-changing activities to Bank Indonesia. For payment-system activities, apply Bank Indonesia Regulation No. 10 of 2025 and preserved implementing rules, including Regulation No. 23/6/PBI/2021 only to the extent consistent; do not treat an AML registration or reporting account as a business licence.	Licence inventory, regulatory correspondence, approved activities, conditions, renewals and change-control record.	Law No. 21 of 2011 as amended by Law No. 4 of 2023; BI Regulation No. 10 of 2025; BI Regulation No. 23/6/PBI/2021 to the extent preserved by BI Regulation No. 10 of 2025; BI Regulation No. 10 of 2024
Use the current digital-finance and crypto perimeter.	For digital financial assets and crypto, assess and license the activity under OJK Regulation No. 27 of 2024 as amended by OJK Regulation No. 23 of 2025. From 1 September 2026, implement the applicable periodic, incident, asset-evaluation and application-related reporting procedures under PADK OJK No. 3 of 2026, while applying the PADK's staged transitional treatment of SEOJK No. 20/SEOJK.07/2024. Do not rely on obsolete Bappebti-only treatment.	Classification memo, OJK licence or registration, report inventory and submissions, transition analysis, approved asset and activity list and supervisory correspondence.	Law No. 4 of 2023; Government Regulation No. 49 of 2024; OJK Regulation No. 27 of 2024 as amended by OJK Regulation No. 23 of 2025; PADK OJK No. 3 of 2026
Apply the sector rule in addition to the national laws.	Maintain a control map for OJK Regulation No. 8 of 2023, BI Regulation No. 10 of 2024 or the relevant PPATK/professional rule; resolve conflicts and amendments with Indonesian counsel.	Obligations register, effective-date log, gap assessment, counsel advice and implementation sign-off.	Law No. 8 of 2010, Article 18; OJK Regulation No. 8 of 2023; BI Regulation No. 10 of 2024

Governance and risk assessment

A risk-based programme must be governed, documented, resourced and tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise ML/TF/PF risk assessment.	Assess customers, countries, products, services, transactions, delivery channels, technology and distribution partners; update for material change and national or sector risk information.	Methodology, current assessment, data sources, approvals, residual-risk decisions and remediation plan.	OJK Regulation No. 8 of 2023, Articles 7-9 and 17; BI Regulation No. 10 of 2024
Operate an approved AML/CFT/CPF programme.	Translate risk into written policies for CDD, monitoring, reporting, sanctions, records, employees, training, groups, third parties and regulatory access.	Board-approved programme, control owners, procedures, training, testing, issues and closure evidence.	OJK Regulation No. 8 of 2023, Articles 7-17; BI Regulation No. 10 of 2024
Assign accountable leadership and independent assurance.	Document board and director oversight, a sufficiently independent compliance function, escalation and risk-based testing; deliver role-appropriate training at the applicable frequency.	Appointments, committee minutes, reports, independence assessment, test plan, findings and annual training records.	OJK Regulation No. 8 of 2023, Articles 10-16 and 64-72

Natural-person identification

CDD identifies the person, any principal and the purpose and funding of the relationship.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Trigger CDD at the legally required events.	Apply CDD on establishing a business relationship, a transaction of at least IDR 100 million or equivalent, suspicion, or doubt about supplied information, then apply the stricter relevant sector rule.	Trigger matrix, aggregation logic, onboarding record, alert link and exception approval.	Law No. 8 of 2010, Article 18(3); OJK Regulation No. 8 of 2023, Articles 24-25
Identify and verify the individual from reliable current evidence.	Collect required identity, contact, occupation, source-of-funds and purpose information; verify against reliable independent documents or data and resolve inconsistencies.	Identity attributes, document/data provenance, verification result, fraud checks and discrepancy resolution.	Law No. 8 of 2010, Articles 19-21; OJK Regulation No. 8 of 2023, Articles 25-26 and 30
Identify representatives and underlying principals.	Determine whether the person acts for self or another, verify the represented person, verify the representative and establish authority before permitting activity.	Principal and representative KYC, mandate, signature or electronic authority, scope and activity log.	Law No. 8 of 2010, Articles 19-20; OJK Regulation No. 8 of 2023, Article 30(2)
Control delayed verification and failed CDD.	Reject the transaction where required identity or supporting documents are incomplete. A financial service provider must terminate the business relationship where the customer refuses the customer-identification principle or the provider doubts the truth of the information, and must report that termination to PPATK as a suspicious financial transaction. Apply any stricter sector rule and document the decision.	Exception basis, restrictions, completion timestamp, refusal/termination decision, PPATK report and receipt.	Law No. 8 of 2010, Articles 20 and 22; OJK Regulation No. 8 of 2023, Articles 23, 30(5)-(7) and 33(12)

KYB, registries, and beneficial ownership

Legal existence, authority, ultimate ownership and control require separate evidence.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify the corporation or legal arrangement and its authorised persons.	Obtain legal name, form, licence, registered address, formation and governance documents, business purpose, officers and reliable AHU or other competent-register evidence.	Current registry extract, constitutional documents, licence, officer list, authority and discrepancy log.	OJK Regulation No. 8 of 2023, Articles 27-30
Identify and verify the AML beneficial owner.	Follow ownership, benefit and control to natural persons, including persons controlling the account, transaction, corporation or arrangement; do not stop at a nominee, direct shareholder or percentage threshold.	Layered ownership chart, control analysis, funding trail, independent corroboration and verified natural-person identities.	OJK Regulation No. 8 of 2023, Articles 30 and 33-34
Apply the separate corporate beneficial-owner duties.	For covered corporations, determine the persons meeting the entity-specific more-than-25% and alternative control/benefit tests, report through AHU, report changes within three working days and update information annually.	BO determination, AHU receipts, change log, annual update and verification questionnaire/result.	Presidential Regulation No. 13 of 2018, Articles 3-11 and 18-21; Minister of Law Regulation No. 2 of 2025
Do not treat AHU data as conclusive AML proof.	Compare the registry declaration with ownership, voting, benefit, appointment and control evidence; escalate inconsistencies and preserve the functional AML conclusion.	AHU record, shareholder and governance records, source comparison, customer explanation and escalation outcome.	Presidential Regulation No. 13 of 2018, Article 11; OJK Regulation No. 8 of 2023, Article 33

PEPs, enhanced due diligence, and remote onboarding

PEP, high-risk and non-face-to-face exposure require stronger, risk-sensitive measures.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify PEPs, relevant family and close associates.	Screen customers, beneficial owners and relevant principals for foreign, domestic and international-organisation PEP status, then extend required treatment to family and close associates.	Screening source and timestamp, role and relationship map, risk conclusion and refresh history.	OJK Regulation No. 8 of 2023, Articles 2, 35-40
Apply EDD to high-risk relationships.	Obtain the required senior approval, analyse and corroborate source of funds and source of wealth, collect additional information and apply enhanced monitoring; preserve the regulation's risk qualification for domestic and international-organisation PEPs.	EDD trigger, senior decision, source corroboration, monitoring plan and periodic review.	OJK Regulation No. 8 of 2023, Articles 35-39
Control electronic and remote verification.	Use reliable electronic processes, test impersonation, document and liveness risks, govern third parties and protect identity and biometric data; the regulated institution remains accountable for verification outcomes.	Method assessment, test results, vendor diligence, privacy basis, human exception route and quality monitoring.	OJK Regulation No. 8 of 2023, Articles 21-22 and 30; Law No. 27 of 2022, Articles 4 and 34-39

Monitoring and suspicious reporting

Ongoing monitoring must support a documented and timely PPATK decision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor customer and transaction activity continuously.	Compare activity with customer profile, business purpose, source of funds and expected pattern; update CDD and investigate anomalies without tipping off.	Scenario inventory, alerts, case chronology, customer refresh, explanation and disposition.	Law No. 8 of 2010, Article 18(5); OJK Regulation No. 8 of 2023, Articles 51-52
Identify suspicious financial transactions without waiting for proof.	Apply the statutory indicators to transactions that deviate from the customer profile or pattern, appear designed to avoid reporting, are conducted or cancelled using assets suspected to derive from crime, or are requested by PPATK; record when the provider knew the suspicious elements. Apply any additional attempted-transaction rule only where a current sector instrument expressly requires it.	Alert and referral timestamps, facts reviewed, statutory analysis, decision-maker and audit trail.	Law No. 8 of 2010, Article 1(5) and Article 23(1)(a)
Report covered suspicion to PPATK on time.	Submit through the current PPATK reporting system as soon as possible and no later than three working days after a financial service provider knows the suspicious elements; use the profession or sector-specific clock where different.	Knowledge timestamp, report payload, submission receipt, corrections and late-report escalation.	Law No. 8 of 2010, Article 25(1); Government Regulation No. 43 of 2015 as amended
Protect report confidentiality and prevent tipping off.	Restrict access to suspicion and report information, pre-clear external disclosures and train staff not to reveal that a report was or will be made.	Access log, disclosure decision, confidentiality controls, training and incident record.	Law No. 8 of 2010, Article 12

Cash reports, transfers, and payments

Cash, cross-border transfer and payment controls have different scopes and thresholds.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Report covered financial-service cash transactions.	Aggregate physical-cash transactions within one working day and report at least IDR 500 million or foreign-currency equivalent to PPATK within 14 working days, unless a statutory exception applies; retain the exception list.	Aggregation output, currency conversion, report and receipt, exception authority and retained exception list.	Law No. 8 of 2010, Articles 23-25
Keep other threshold and cross-border reports separate.	Apply the current PPATK form and sector rule to cross-border fund transfers and the separately scoped IDR 500 million goods/service-provider report; do not reuse the cash definition or threshold outside its legal scope.	Report matrix, PPATK specification version, transaction classification, report and submission receipt.	Law No. 8 of 2010, Articles 23(1)(c), 25(3) and 27
Carry complete wire-transfer information.	For covered bank transfers, capture and transmit traceable originator and beneficiary identity, account/reference, address or identifier, amount, currency and date; reject, suspend, repair or monitor missing-data transfers under risk-based procedures.	Field matrix, message samples, validation rules, exception queue and disposition.	OJK Regulation No. 8 of 2023, Articles 58-62
Apply BI AML controls to covered non-bank payment activity.	For covered payment, transaction-forwarding, remittance and non-bank money-changing activities, implement the BI Regulation No. 10 of 2024 programme and maintain the payment-system authority required by BI Regulation No. 10 of 2025, applying preserved implementing rules only to the extent consistent.	BI perimeter analysis, licence, board programme, risk assessment, reporting map and supervisory returns.	BI Regulation No. 10 of 2024; BI Regulation No. 10 of 2025, including Article 184; BI Regulation No. 23/6/PBI/2021 to the extent preserved

Targeted financial sanctions

DTTOT and proliferation-financing lists require immediate, list-specific action.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain and screen the current DTTOT and DPPSPM.	Screen customers, beneficial owners, controllers, representatives and transactions at onboarding, during the relationship and when competent authorities transmit updated lists; control false positives and false negatives.	List provenance and version, update log, configuration tests, match analysis and disposition.	Law No. 9 of 2013; OJK Regulation No. 8 of 2023, Article 53(1)-(3)
Block a confirmed listed-person match without delay.	Without prior notice, block funds owned or controlled directly, indirectly, wholly or jointly by the matched customer or beneficial owner and prevent funds being made available.	Identity and ownership analysis, decision, blocking timestamp, system blocks and asset inventory.	OJK Regulation No. 8 of 2023, Article 53(2)-(5)
Send each sanctions report to the correct recipient.	Create the blocking record, report DTTOT blocking to Police and DPPSPM blocking to PPATK, copy OJK where required, submit the related STR, and apply the applicable three-working-day sector clock for blocking or nil reports.	Blocking record, Police/PPATK/OJK notices, STR, receipts, nil-report decision and deadline calculation.	OJK Regulation No. 8 of 2023, Article 53(6)-(10) and Articles 76-77

Records and regulator access

Retention begins from the record-specific legal event and must preserve reconstruction.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain customer identity and CDD records for the required period.	Keep identity and CDD records for at least five years from the applicable end of relationship, transaction or sector trigger; suspend disposal for investigations, orders or legal holds.	Retention schedule, trigger date, immutable record set, hold register, access log and disposal approval.	Law No. 8 of 2010, Article 21(2); OJK Regulation No. 8 of 2023, Article 63
Retain transaction and beneficial-owner evidence under their own rules.	Map company-document and transaction retention separately; preserve corporate BO change and update documents for at least five years from the relevant formation/approval or dissolution event.	Record-class map, transaction trail, BO archive, trigger evidence and reconciliation tests.	OJK Regulation No. 8 of 2023, Article 63; Presidential Regulation No. 13 of 2018, Article 22
Make records retrievable for competent authorities.	Index records so PPATK, OJK, Bank Indonesia or another competent authority can reconstruct identity, authority, ownership, monitoring, reporting and transaction history within the lawful request scope.	Retrieval test, request register, approval, production package, chain of custody and response receipt.	Law No. 8 of 2010, Articles 41-44; OJK Regulation No. 8 of 2023, Article 63

Privacy, biometrics, and transfers

Identity processing must satisfy AML duties and Indonesia's separate personal-data rules.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Establish and document a lawful basis for each processing purpose.	Map collection, verification, screening, monitoring, reporting, retention and deletion to a lawful basis; provide required information and separate optional consent from legally required AML processing.	Processing record, purpose/basis map, notice version, consent record where used and retention decision.	Law No. 27 of 2022, Articles 20-25 and 47
Treat biometric and high-risk identity processing as specifically protected.	Classify biometrics as specific personal data, conduct a DPIA for high-risk processing including specified automated, large-scale or innovative uses, minimise data and implement access, security and vendor controls.	Data inventory, DPIA, necessity assessment, architecture, access tests, vendor terms and incident plan.	Law No. 27 of 2022, Articles 4 and 34-39
Notify a personal-data protection failure within 3 x 24 hours.	Notify affected data subjects and the statutory institution in writing within 3 x 24 hours, stating the exposed data, when and how exposure occurred and remediation; verify the current institutional channel and any public-notice duty.	Incident timeline, assessment, notice content, delivery receipts, authority-channel verification and recovery record.	Law No. 27 of 2022, Article 46
Control cross-border transfers and the privacy function.	For overseas transfers, document equivalent-or-higher protection, otherwise binding adequate safeguards, otherwise data-subject consent; appoint a privacy officer/function when an Article 53 trigger applies, read with Constitutional Court Decision 151/PUU-XXII/2024.	Transfer assessment, safeguards or consent, recipient diligence, appointment, role description and monitoring.	Law No. 27 of 2022, Articles 53-56; Constitutional Court Decision No. 151/PUU-XXII/2024

Practical evidence packs

Package evidence so a reviewer can reconstruct each decision without oral context.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a customer and ownership evidence pack.	Bundle identity, authority, AHU and other registry evidence, ownership/control analysis, beneficial-owner verification, PEP/sanctions results, risk rating and approvals with provenance and timestamps.	Versioned case pack and completeness control signed by the responsible owner.	Law No. 8 of 2010, Articles 18-21; OJK Regulation No. 8 of 2023, Articles 25-40 and 63
Maintain monitoring, reporting and sanctions evidence.	Link alerts and list versions to investigations, STR/threshold/blocking decisions, recipients, deadline calculations, receipts and remediation while segregating restricted report information.	Case export, decision log, submission receipts, access controls and quality review.	Law No. 8 of 2010, Articles 12 and 23-27; OJK Regulation No. 8 of 2023, Articles 51-53 and 74-77
Maintain licence, privacy and change evidence.	Keep current licences, regulatory perimeter decisions, legal updates, DPIAs, transfer assessments, incident notices, vendor assurance and tested change approvals together.	Licence file, obligations register, privacy pack, vendor pack, change tickets and management attestations.	BI Regulation No. 10 of 2024; OJK Regulation No. 27 of 2024 as amended; Law No. 27 of 2022

SOURCES AND FURTHER READING

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

Law No. 8 of 2010 on Prevention and Eradication of Money Laundering
Audit Board of Indonesia legal database (JDIH BPK) · Primary legislation
Open official source

Government Regulation No. 43 of 2015 on Reporting Parties
JDIH BPK · Primary regulation
Open official source

Government Regulation No. 61 of 2021 amending reporting-party scope
JDIH BPK · Primary regulation
Open official source

Law No. 9 of 2013 on Prevention and Eradication of Terrorism Financing
JDIH BPK · Primary legislation
Open official source

OJK Regulation No. 8 of 2023 on AML, CFT and CPF programmes
Financial Services Authority (OJK) · Primary sector regulation
Open official source

Bank Indonesia Regulation No. 10 of 2024 on AML, CFT and CPF programmes
Bank Indonesia · Primary sector regulation
Open official source

Bank Indonesia Regulation No. 10 of 2025 on the payment industry
Bank Indonesia · Primary sector regulation
Open official source

Bank Indonesia payment-system licensing
Bank Indonesia · Official licensing guidance
Open official source

Presidential Regulation No. 13 of 2018 on corporate beneficial ownership
JDIH BPK · Primary regulation
Open official source

Minister of Law Regulation No. 2 of 2025 on BO verification and supervision
Directorate General of General Legal Administration (AHU) · Primary regulation
Open official source

AHU Online corporate services
Ministry of Law · Official registry service
Open official source

Law No. 27 of 2022 on Personal Data Protection
JDIH BPK · Primary legislation
Open official source

Constitutional Court Decision No. 151/PUU-XXII/2024
Constitutional Court via JDIH BPK · Authoritative court decision
Open official source

OJK Regulation No. 27 of 2024 on digital financial asset and crypto trading
Financial Services Authority (OJK) · Primary sector regulation
Open official source

OJK Regulation No. 23 of 2025 amending the digital-financial-asset and crypto trading framework
Financial Services Authority (OJK) · Primary sector regulation
Open official source

PADK OJK No. 3 of 2026 implementing digital financial asset and crypto reporting
Financial Services Authority (OJK) · Primary implementing regulation
Open official source

OJK digital financial asset and crypto publications
Financial Services Authority (OJK) · Official current guidance
Open official source

OJK and Bappebti end digital-asset supervision transition
Financial Services Authority (OJK) · Official transition statement
Open official source

PPATK profile and FIU mandate
PPATK · Official authority profile
Open official source

PPATK goAML reporting portal
PPATK · Official reporting service
Open official source

FATF Indonesia country profile
FATF · Authoritative current assessment
Open official source

Indonesia third enhanced follow-up report - 3 June 2026
FATF · Authoritative current assessment
Open official source

FATF jurisdictions under increased monitoring - 19 June 2026
FATF · Authoritative current status
Open official source

FATF high-risk jurisdictions subject to a call for action - 19 June 2026
FATF · Authoritative current status
Open official source

Law No. 24 of 2009 on the State Flag
JDIH BPK · Primary national-symbol legislation
Open official source

Secretariat of State guidance on Sang Merah Putih
Ministry of State Secretariat · Official national-symbol guidance
Open official source

Document control

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