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STANDARDIZATION OF ACCOUNT MANAGEMENT IN COMMERCIAL BANKS

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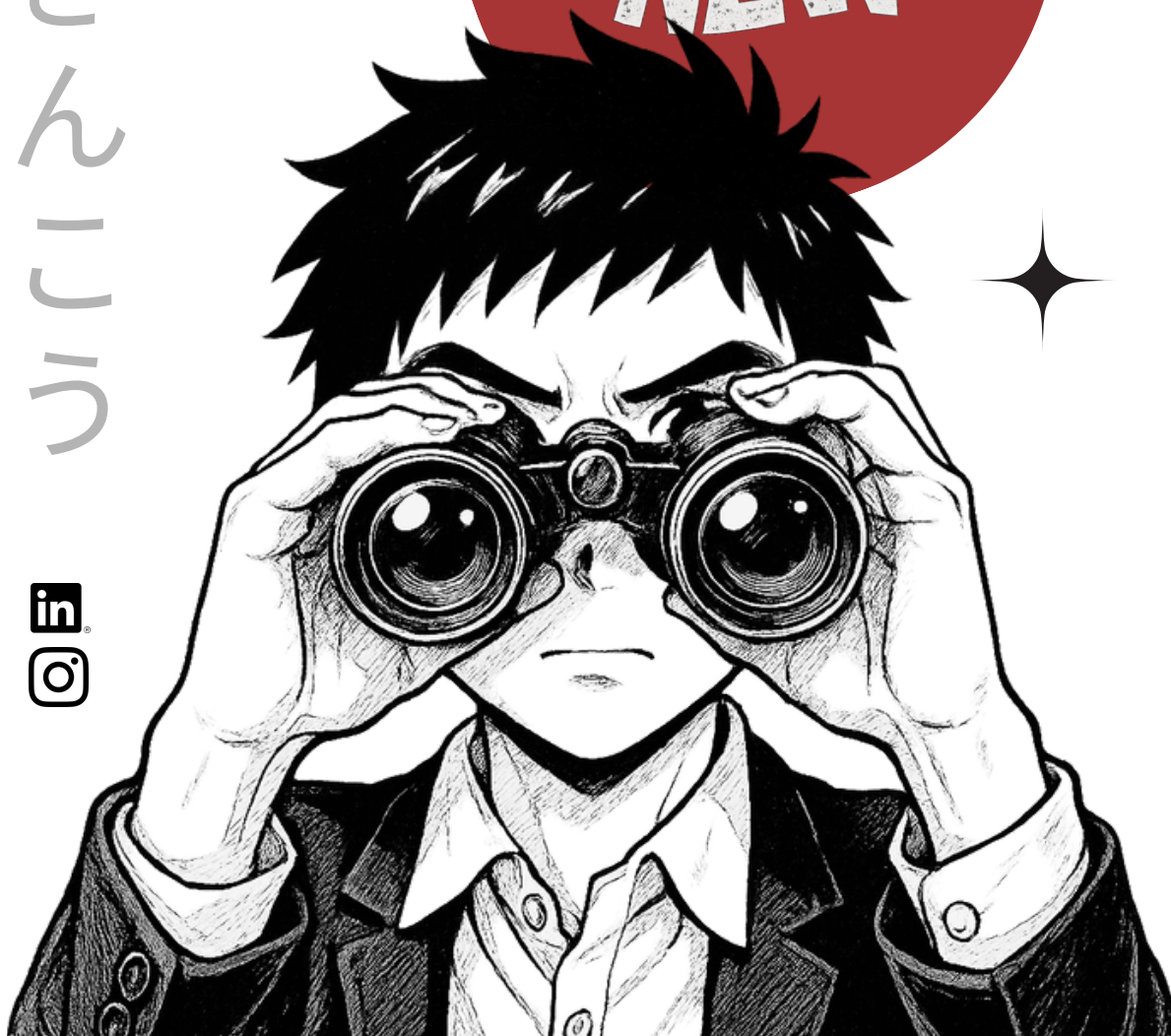
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WHAT'S
NEW

REGULATION SUMMARY

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On 10 November 2025, the Financial Services Authority (“OJK”) enacted OJK Regulation No. 24 of 2025 concerning the Management of Bank Accounts of Commercial Banks (“POJK 24/2025”). The urgency for issuing POJK 24/2025 is driven by two main factors, namely the inharmony of account management policies for Customers in Commercial Banks (“Banks”) and the lack of adequate supervision coupled with the increasing occurrence of criminal acts involving the misuse of dormant and inactive Bank accounts, particularly in relation to Money Laundering crimes (“TPPU”). With the enactment of POJK 24/2025, Article 6 paragraph (6) of OJK Regulation No. 1/POJK.03/2022 concerning Branchless Financial Services in the Context of Financial Inclusion (“POJK 1/2022”) is revoked¹. The scope of POJK 24/2025 includes provisions on Policies and Procedures for Administration of Checking and Savings Accounts, Customer Obligations, Management and Supervision of Inactive and Dormant Checking and Savings Accounts, and Administrative Sanctions.

CRITERIA FOR CUSTOMERS, TYPES OF ACCOUNT, AND COMMERCIAL BANKS

1. A Commercial Bank is a Bank that conducts business conventionally or based on sharia principles, providing services in the payment system, including branch offices of foreign Banks and sharia business units.
2. A Customer (“Customer”) is a Customer placing funds with the Bank in the form of deposits pursuant to an agreement between the Bank and the given Customer.
3. Accounts (“Customer Accounts”) referred to in this Regulation consist of Checking Accounts (Giro) and Savings Accounts:
 - a. GIRO refers to GIRO as stipulated in Banking Law² and Sharia Banking Law³.
 - b. Savings refers to Savings as stipulated in Banking Law⁴ and Sharia Banking Law⁵.The Banking Laws referred to are Law No. 4 of 2023 on the Development and Strengthening of the Financial Services Sector (“UU P2SK”).

¹ ‘In the event that the BSA balance is zero and/or there are no transactions for six (6) consecutive months, the status of the BSA may be converted into a dormant account’. Article 6 paragraph (6) of POJK 1/2022.

² ‘A Giro constitutes a deposit that may be withdrawn at any time through the use of checks, bilyet giro, other payment order instruments, or by means of book transfer’. Article 14 of the Financial Sector Development and Strengthening Law (“P2SK Law”), which amends Article 1 point 6 of Law No. 7 of 1992 on Banking (“Banking Law”), as lastly amended by Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation (“Job Creation Perppu”).

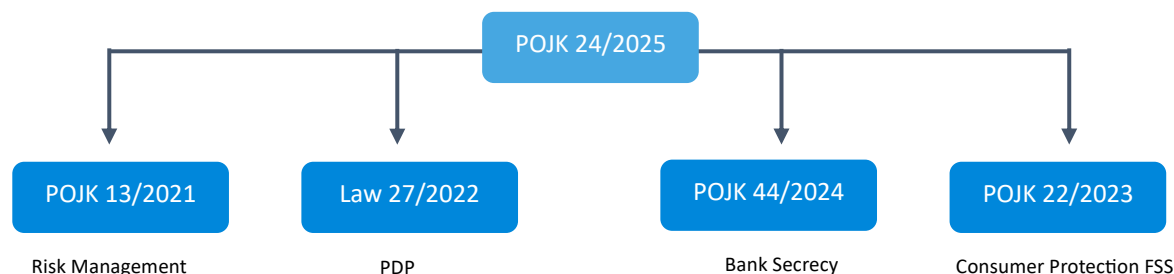
³ ‘A Giro constitutes a deposit based on a wadi’ah contract or any other contract that does not contravene Sharia Principles, where withdrawal may be made at any time through the use of checks, bilyet giro, other payment order instruments, or by means of book transfer’. Article 15 of the Financial Sector Development and Strengthening Law (“P2SK Law”), which amends Article 1 point 24 of Law No. 21 of 2008 on Sharia Banking (“Sharia Banking Law”), as lastly amended by Government Regulation in Lieu of Law on Job Creation (“Job Creation Perppu”).

⁴ ‘A Savings Deposit constitutes a deposit that may only be withdrawn subject to certain mutually agreed conditions, and cannot be withdrawn by means of checks, bilyet giro, or any other similar instruments’. Article 14 of the Financial Sector Development and Strengthening Law (“P2SK Law”), which amends Article 1 point 9 of the Banking Law.

⁵ ‘A Savings Deposit constitutes a deposit based on a Wadi’ah contract, a Mudarabah contract, or any other contract that does not contravene Sharia Principles, the withdrawal of which may only be made subject to certain mutually agreed terms and conditions, and cannot be withdrawn by means of checks, bilyet giro, and/or any other similar instruments’. Article 15 of P2SK Law, which amends Article 1 point 24 of the Sharia Banking Law.

LEGAL FRAMEWORK FOR MANAGEMENT OF CUSTOMER ACCOUNTS

The implementation of Customer account management requires Banks to uphold legal principles that apply to specific regulatory sub-sectors, particularly those governing Risk Management, Personal Data Protection (“PDP”), Consumer Protection in Financial Services (“Consumer Protection FSS”), and Bank Secrecy.

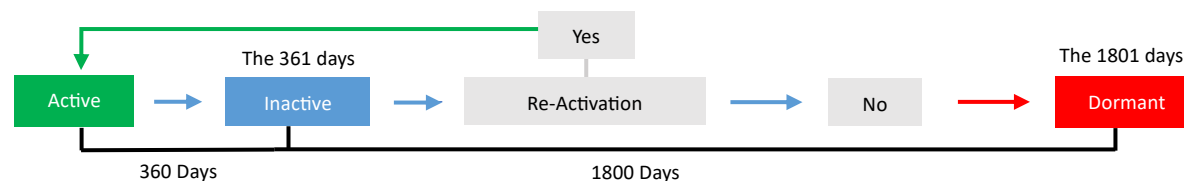


CLASSIFICATION OF CUSTOMER ACCOUNTS

Status	Activities			Time Period
	Funds Inflow	Funds Outflow	Balance Checking	
Active	✓	✓	✓	-
Inactive	✗	✗	✗	360 Days
Dormant	✗	✗	✗	1800 Days

Article 3 paragraph (1) of POJK 24/2025 does not impose any requirement for transactional activities to be performed on a Customer Account. Any Customer Account shall remain classified as an Active Account insofar as the Customer continues to perform balance checking. Likewise, if a Customer Account is subject to a dispute, the Bank shall maintain such classification as an Active Account. In the event that no activities of any kind occur on a Customer Account for a period of 360 (three hundred and sixty) days, the Bank may, on the 361st (three hundred and sixty-first) day, classify such Customer Account as an Inactive Account.

The status of a Customer Account may be elevated from Inactive to Dormant if, within a period of 1,800 (one thousand eight hundred) days, the Customer does not submit a request for reactivation through the Bank’s channels. The Bank shall classify such account as Dormant on the 1,801st (one thousand eight hundred and first) day.



This classification also applies to each account held by the Customer if the Customer has more than one type of account, and the status of any such account shall not affect the status of the other accounts.

STANDARDS FOR POLICY FORMULATION AND ACCOUNT MANAGEMENT PROCEDURES

Article 4 of POJK 24/2025 sets binding standards for Banks in drafting internal policies and procedures concerning Customer account management, aiming to create harmonized governance consistent with the good governance obligations in Article 2 of POJK 24/2025. The 10 matters that must be reflected in the internal policies and procedures include:

Aspects	Contents
<i>Customer Disclosure.</i>	<ul style="list-style-type: none"> • Notification to the Customer upon opening a Giro and Savings account regarding the criteria for determining the classification of active, inactive and dormant accounts, including the automatic closure of the Customer's account; • Information to the Customer through the channels available at the Bank regarding the classification of the Customer's account; • Communication to the Customer to make deposits, withdrawals, balance checks or account closures; • Mechanism in the event that the Customer cannot be contacted; • Charging of administrative fees and payment of interest/interest in the agreement between the Bank and the Customer;
<i>Recordkeeping</i>	<ul style="list-style-type: none"> • System flagging for Active, Inactive, and Dormant accounts, including separation from other accounts for reporting purposes;
<i>Operational Monitoring</i>	<ul style="list-style-type: none"> • Monitoring and internal control over Inactive and Dormant accounts; • Verification and validation procedures for reactivation of Inactive and Dormant accounts;
<i>ALM (Account Lifecycle Management)</i>	<ul style="list-style-type: none"> • Mechanism for closing Customer accounts via Bank channels; and • Automatic closure of zero-balance Checking and Savings accounts for a maximum of 6 months.

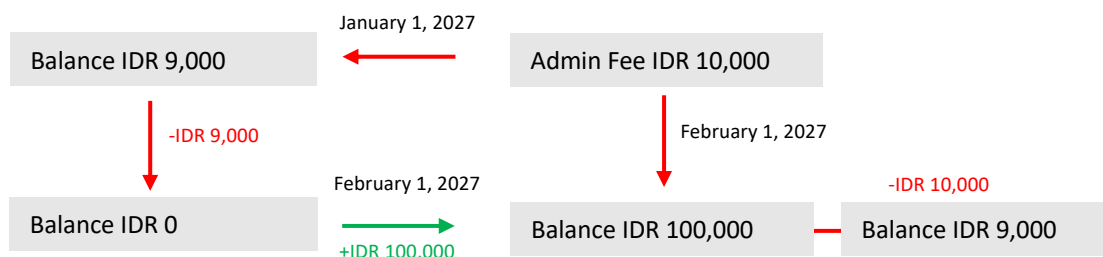
MANAGEMENT OF INACTIVE AND DORMANT ACCOUNTS

POJK 24/2025 distinguishes between the Bank's obligations in managing the Customer's account in Inactive status and the Customer's account in dormant *status*. The following are the Bank's obligations in managing the Customer's inactive and dormant accounts:

Bank Obligations	Inactive Account	Dormant Account
Information Delivery	Providing information to the Customer related to the status of the Customer's account when classified as Inactive through the Bank's channel.	<ol style="list-style-type: none"> 1. Providing information through the Bank's channels regarding the status of the Customer's account when classified as Dormant; 2. Providing information through written correspondence or electronic mail and through meetings between the Bank and the Customer at least once: <ol style="list-style-type: none"> a. Every 5 years for accounts with a maximum balance of Rp100,000,000 (one hundred million rupiah); b. Every 3 years for accounts with a balance exceeding Rp100,000,000 (one hundred million rupiah); c. Every 1 year for accounts with a balance exceeding Rp1,000,000,000 (one billion rupiah);

Account Re-activation.	Executing account reactivation after the Customer submits a reactivation request.	Directing the Customer to submit a request for account reactivation.
		Conducting Customer Due Diligence (“CDD”) upon receiving the Customer’s request for account reactivation.
		Executing the reactivation through the Bank’s channels after the Customer submits a reactivation request and the Bank approves the request.
		Rejecting the reactivation request if the Customer’s account meets certain criteria, including: 1. Suspicious transactions are identified in relation to Money Laundering or other criminal acts; 2. The Bank has reasonable doubts concerning the information provided by the Customer; 3. The Customer refuses to provide the information required by the Bank; or 4. Other criteria that can be reasonably justified.
Disabling Transaction Features.	Withdrawal feature.	Withdrawal and Deposit features.
Charging of Interest and Granting of Profit-Sharing Benefits	-	1. Charging 0% interest for savings accounts with balances below Rp10,000,000 (ten million rupiah) and 0.5% interest for savings accounts with balances above Rp10,000,000 (ten million rupiah); 2. Granting Profit Sharing (Nisbah) between the Bank and the Customer at a ratio of 70% for average Mudharabah savings balances below Rp10,000,000 (ten million rupiah) and 60%:40% for average Mudharabah savings balances above Rp10,000,000 (ten million rupiah).
Account Management Period	-	Maintaining the Customer’s account for up to 30 (thirty) years.
Account Termination.	-	Terminating the Customer’s account after the lapse of 30 (thirty) years in accordance with the Indonesian Civil Code.

In relation to the imposition of administrative fees, the Bank retains the right to charge administrative fees on accounts classified as Inactive or Dormant. Furthermore, in the event that the remaining balance in the Customer’s account is insufficient to cover the Bank’s administrative fees, the Bank is permitted to deduct the entirety of the remaining balance in such account until the balance reaches zero. Article 4 paragraph (2) of POJK 24/2025 only prohibits the Bank from charging administrative fees that exceed the remaining account balance and cause the Customer’s account to have a negative balance.



SUPERVISION OF INACTIVE AND DORMANT ACCOUNT

The Board of Directors, Board of Commissioners, and the Sharia Supervisory Board (“DPS”)⁶ play a significant role and bear full responsibility in conducting active supervision over Customer Accounts classified as Inactive and Dormant. The supervisory mechanism in the implementation of POJK 24/2025 is categorized based on the Anti-Money Laundering (“AML”) Program and the Anti-Fraud Program.

AML, CTF, WMDP Program	<ol style="list-style-type: none"> Supervisors submit a report to the unit responsible for handling AML, Counter-Terrorism Financing (“CTF”), and Weapons of Mass Destruction Proliferation Financing (“WMDPF”) for verification if suspicious transactions are identified in Customer accounts classified as Inactive or Dormant that are suspected of fulfilling the elements of AML, CTF, and WMDPF criminal conduct⁷. In the event that, based on the results of the verification, indications of AML, CTF, and WMDPF are found, the unit shall submit a report to the Financial Transaction Reports and Analysis Center (“PPATK”)⁸.
Anti-Fraud Program	<ol style="list-style-type: none"> In the event that transactions in Active or Dormant accounts are suspected of containing indicators of fraud, the supervisors shall report the matter to the work unit or function responsible for implementing the anti-fraud strategy for further verification. In the event that transactions in Active or Dormant accounts are suspected of containing indicators of fraud, the supervisors shall report the matter to the work unit or function responsible for implementing the anti-fraud strategy for further verification.⁹ In the event that fraudulent transactions are indicated to constitute money laundering, the Bank shall report the matter to PPATK.

⁶ Active supervision by the Sharia Supervisory Board is carried out for Banks that conduct business activities based on Sharia principles.

⁷ The unit referred to herein is a specialized working unit established or designated by the Bank’s Board of Directors, which is responsible for implementing the AML, CTF, and WMDP programs as stipulated in Article 8 paragraph (1) letter c in conjunction with Article 12 of OJK Regulation No. 8 of 2023 concerning the Implementation of AML, CTF, and WMDP Programs (“POJK 8/2023”).

⁸ Article 14 paragraph (4) of POJK 24/2025 in conjunction with Article 15 letter d of POJK 8/2023.

⁹ OJK Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Services Institutions.

SANKSI ADMINISTRATIF

The administrative sanction stipulated in Article 16 of POJK 24/2025 is in the form of a Written Warning. Should the Bank fail to comply with the requirements of the violated provisions, OJK may follow up by imposing sanctions in the form of a prohibition from issuing new products, suspension of certain business activities, prohibition from expanding business activities, prohibition from conducting new business activities, and/or a downgrade of the governance factor rating in the assessment of the Bank's soundness level.

Provision	Regarding
Article 4	The Bank's obligation to establish policies and procedures for account administration.
Article 5 paragraph (1)	The Bank's obligation to apply risk management in the implementation of Customer account management.
Article 10 paragraph (1)	The Bank's obligation to provide information to Customers when classified as Inactive.
Article 11 paragraphs (1) and (2)	The Bank's obligation to provide information when accounts are classified as Dormant.
Pasal 12 ayat (2)	The Bank's obligation to conduct CDD prior to reactivating Dormant accounts.
Pasal 14 ayat (1)	The Bank's obligation to conduct enhanced supervision of Inactive and Dormant accounts in the context of AML, CTF, and WMDPF implementation.
Pasal 15 ayat (1)	The Bank's obligation to conduct enhanced supervision of Inactive and Dormant accounts in the context of the Anti-Fraud program.

CLOSING REMARKS

POJK 24/2025 provides an accountable normative standard for the management of Customer Accounts through classification separation, information disclosure obligations, reactivation mechanisms, and the imposition of fees on a limited basis. The provisions on supervision by the Board of Directors, Board of Commissioners, and the Sharia Supervisory Board ("DPS"), together with its integration with AML, CTF, WMDPF, and Anti-Fraud programs, reaffirm that the management of inactive and dormant accounts is not merely an administrative issue, but forms part of the safe and sound banking framework and systemic risk mitigation efforts. Given its prescriptive and principle-based nature, the implementation of POJK 24/2025 requires harmonization of the Bank's internal policies and consistency in the execution of AML, CTF, WMDPF, and Anti-Fraud programs. Ultimately, the effectiveness of this regulation will be reflected in the Bank's ability to integrate normative compliance with governance that is prudent, measurable, and auditable, thereby enabling OJK's objectives to prevent account misuse and maintain the integrity of the payment system to be optimally achieved.

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