



TAX UPDATES Issue 07 | October 2025

TAX ASPECTS OF CRYPTO ASSET TRADING TRANSACTIONS

The government has regulated the transfer of regulatory and supervisory duties for digital financial assets, including crypto assets and financial derivatives, from the Commodity Futures Trading Regulatory Agency (Bappebti) to the Financial Services Authority (OJK) through Government Regulation No. 49 Year 2024, which came into effect on January 10, 2025.

Furthermore, as a follow-up to the implementation of the provisions of Article 44E paragraph (2) letter f of Law Number 7 Year 2021, the Minister of Finance issued Minister of Finance Regulation Number 50 Year 2025 (MoF Regulation-50/2025) which aims to provide legal certainty regarding the imposition of taxes on crypto asset trading transactions as digital financial assets that are equated with securities, which came into effect on August 1, 2025.

RELATED TAX REGULATIONS*:

 Ministry of Finance Regulation No. 50 of 2025

*All tax regulations are in Bahasa Indonesia





CONTINUED FROM PAGE 1

Value Added Tax (VAT) Aspect

- A. The transfer of Crypto Assets treated as securities is not subject to VAT.
- B. The provision of Taxable Services in the form of **provision of Electronic Channels** used to facilitate crypto asset trading transactions by Electronic Trading System Operators is subject to VAT, as follows:
 - Electronic Trading System Operators that have been confirmed as Taxable Entrepreneurs are required to collect, remit, and report the VAT payable on the delivery of Taxable Services.
 - 2. The VAT payable is calculated as follows:

VAT = 12% x Other Value Tax Base

Other Value Tax Base = 11/12 x Compensation in the form of commission or remuneration

- 3. Invoices issued by Electronic Trading System Operators for the provision of Electronic Channels to facilitate Crypto Asset trading transactions are designated as specific documents that are equivalent to Tax Invoices.
- C. The provision of Taxable Services in the form of **cryptocurrency transaction verification services** by Crypto Asset Miners is subject to VAT, with the following provisions:
 - 1. Crypto Asset Miners who have been confirmed as Taxable Entrepreneurs are required to collect, remit, and report the VAT payable on the delivery of Taxable Services.
 - 2. VAT is collected at a specific rate calculated as follows:

VAT = 20% x (11/12 x 12% x Tax Base)

Tax Base = Monetary compensation for Crypto Assets received by Crypto Asset Miners, including those received from the system (block reward)

3. Crypto Asset Miners are Taxable Retail Traders, so they can issue Tax Invoices in accordance with the provisions for delivery of Taxable Service to recipients with end consumer characteristics.

In the case of compensation received by Electronic Trading System Operators or Crypto Asset Miners in the form of:

- 1. Fiat currencies other than the rupiah shall be converted into rupiah based on the exchange rate as stipulated by the Minister of Finance which applicable at the time the Tax Invoice or certain documents equivalent to Tax Invoices should be issued; or
- 2. Crypto Assets, which are then converted into rupiah based on:
 - the value set by the Stock Exchange;
 - the value in the system owned by the Crypto Asset Miner; or
 - the value of the sale of Crypto Assets conducted before the VAT payment deadline, which is applied consistently.



CONTINUED FROM PAGE 2

Income Tax (PPh) Aspects

- A. Income received or obtained by the Crypto Asset Seller through Electronic Channels provided by:
 - A1. Domestic Electronic Trading System Operators, the income of Crypto Asset Sellers is subject to Income Tax Article 22 at a rate of 0.21%, which is final, with the following provisions:
 - 1. Electronic Trading System Operators (Digital Financial Asset Traders) are required to collect, remit, and report the income tax payable.
 - 2. The following are transaction values subject to collection and timing of Income Tax Article 22 liability:

Type of Crypto Asset Transaction	Transaction Value	Due Date
Transactions with fiat currency payments	The amount of money paid by the Crypto Asset Buyer	Payment received by the Electronic Trading System Operators
Crypto Asset Exchange (swap)	The value of each Crypto Asset transferred by the transacting parties	Execution of the exchange
Other Crypto Asset Transactions	Amount of payment received by the Crypto Asset Seller	Other income payments

3. Electronic Trading System Operators are required to issue Withholding and/or Collection of Unified Income Tax Slip no later than the end of the relevant Tax Period, which may be in the form of documents equivalent to the Withholding and/or Collection of Unified Income Tax Slip.

The above provisions also apply to income earned by Electronic Trading System Operators (acting on their own behalf) from Crypto Asset transactions through Electronic Channels provided by other Electronic Trading System Operators, as well as to income earned by Crypto Asset Miners (as Crypto Asset Sellers) from Crypto Asset transactions through Electronic Channels provided by Electronic Trading System Operators.

However, there are **exceptions** to the Income Tax Article 22 obligation:

- 1. Electronic Trading System Operators are not required to collect Income Tax Article 22 if:
 - a. they only provide electronic wallet (e-wallet) services;
 - they only facilitate the meeting of Crypto Asset Sellers and Crypto Asset Buyers;
 and/or
 - c. they do not facilitate Crypto Asset trading transactions.



CONTINUED FROM PAGE 3

Although exempt from Income Tax Article 22 collection, income earned by Crypto Asset Sellers is still subject to final Income Tax Article 22 at a rate of 0.21%, which must be self-paid and reported in the Monthly Unified Income Tax Return by Crypto Asset Sellers.

- 2. Crypto Asset Sellers are not subject to Income Tax Article 22 if:
 - a. they are Foreign Taxpayers domiciled in a country that has a Tax Treaty with Indonesia and their taxation rights are not in Indonesia; and
 - b. they submit a Certificate of Domicile from the Tax Treaty partner country or jurisdiction to the Electronic Trading System Operators.
- A2. Foreign Electronic Trading System Operators appointed as Income Tax Article 22 Collectors shall impose a final 1% Income Tax Article 22 on income received by Crypto Asset Sellers, with the following provisions:
 - 1. The Electronic Trading System Operators appointed as the Income Tax Article 22 Collector is required to collect, remit, and report the income tax payable.
 - The provisions regarding the transaction value subject to collection, timing of Income Tax Article 22 liability, and the obligation to prepare the Withholding and/or Collection of Unified Income Tax Slip apply equally to Domestic Electronic Trading System Operators (point A1).
 - 3. If the income earned by the Crypto Asset Seller has been subject to income tax abroad, then the foreign income tax cannot be credited against the income tax payable in Indonesia.
 - 4. In the event that the appointed Electronic Trading System Operator does not collect Income Tax Article 22 or the Electronic Trading System Operator providing Electronic Channels has not yet been appointed as Income Tax Article 22 Collector, the income earned by the Crypto Asset Seller shall still be subject to Income Tax Article 22 at a rate of 1%, which is final, with a self-assessment mechanism and reported in the Monthly Unified Income Tax Return by the Crypto Asset Seller.
- B. Income received or obtained by Electronic Trading System Operators from the provision of Electronic Channels used for Crypto Asset transactions is subject to income tax at the general rate in accordance with Article 17 of the Income Tax Law. Such income includes all compensation obtained from:
 - the provision of Electronic Channels used for Crypto Asset transactions;
 - fund withdrawal services;
 - deposit services;
 - transfer services for Crypto Assets between electronic wallets (e-wallets);
 - services for the provision and/or management of storage media for Crypto Assets or electronic wallets (e-wallets); and/or
 - other services related to Crypto Assets.



CONTINUED FROM PAGE 4

The income is not subject to withholding tax by the party utilizing the services, but must be reported in the Annual Income Tax Return of the Electronic Trading System Operator.

- C. Income received or obtained by Crypto Asset Miners in connection with Crypto Assets is subject to income tax at the general rate in accordance with Article 17 of the Income Tax Law, which will become effective starting from fiscal year 2026, including:
 - service fees for Crypto Asset Miners;
 - income from the Crypto Asset system in the form of block rewards, compensation for transaction verification services (transaction fees), or other income from the Crypto Asset system; and/or
 - other income.

This income must be reported in the Annual Income Tax Return for Crypto Asset Miners.

(RED/T3/ALC)

NEW TAX REGULATIONS

ISSUED ON AUGUST TO SEPTEMBER 2025

The Minister of Finance Regulation Number 60 Year 2025 dated August 15, 2025

Additional Value Added Tax Incentive on the Delivery of Landed Houses and Residential Units Borne by the Government for Fiscal Year 2025

The Minister of Finance Decision Number 5/MK/EF/2025 dated August 31, 2025

Interest Rates as the Basis for Calculation of Administrative Sanctions in the Form of Interest and Granting of Interest Compensation for the Period of September 1, 2025 to September 30, 2025

The Minister of Finance Decision Number 7/MK/EF/2025 dated September 30, 2025

Interest Rates as the Basis for Calculation of Administrative Sanctions in the Form of Interest and Granting of Interest Compensation for the Period of October 1, 2025 to October 31, 2025



NEW TAX REGULATIONS ISSUED ON AUGUST TO SEPTEMBER 2025

CONTINUED FROM PAGE 5

The Director General of Taxes Regulation Number PER-15/PJ/2025 dated August 5, 2025

Limitations of Certain Criteria for Other Parties and Appointment of Other Parties to Conduct the Collection, Payment, and Reporting of Income Tax on Income Received or Obtained by Domestic Merchants through an Electronic System Trading Mechanism

The Director General of Taxes Regulation Number PER-16/PJ/2025 dated August 13, 2025

Amendment to the Regulation of the Director General of Taxes Number PER-6/PJ/2025 regarding Implementation of Preliminary Refund of Tax Overpayment for Certain Criteria Taxpayers, Certain Requirement Taxpayers, and Low-Risk Taxable Entrepreneurs, as well as Special Purpose Companies or Collective Investment Contracts as Low-Risk Taxable Entrepreneurs

The Director General of Taxes Regulation Number PER-17/PJ/2025 dated September 1, 2025

Determination of the Registered Location for Individual and Corporate Taxpayers at Large Tax Offices, Special Tax Offices, and Medium Tax Offices

The Director General of Taxes Regulation Number PER-18/PJ/2025

dated September 24, 2025

Follow-up on Concrete Data

(RED/T3/ALC)

PB TAXAND CONTACTS:

https://www.pbtaxand.com/menu/page/partner

DISCLAIMER

The information contained in this document is intended only to be a guide. It must not be relied on in, or applied to, specific situation without previously seeking proper professional advice.

JAKARTA

Menara Imperium, 27th FI.

JI. HR Rasuna Said Kav. 1, 12980

Ph. +62 21 8356363 | Fx. +62 21 83793939

contact@pbtaxand.com

SURABAYA

Graha Bukopin, 9th Fl.
Jl. Panglima Sudirman 10-18, 60271
Ph. +62 31 5319598 | Fx. +62 31 5319599
surabaya@pbtaxand.com

Social MEDIA Scan barcode to connect

