

Corporate Criminal Liability in Government Procurement Corruption: An Analysis of the Chromebook Case and Its Implications for Public Procurement Reform

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Abstract: Corruption in public procurement constitutes a form of crime that has significant implications for state finances and the quality of public governance. The complexity of such crimes indicates that procurement corruption is no longer committed solely by individuals but also involves corporations as entities benefiting economically from unlawful acts. This study aims to analyze the construction of corporate criminal liability in public procurement corruption under Indonesian positive law, examine the application of such liability in the alleged Chromebook procurement corruption case within the Digital Education Program, and assess its implications for public procurement reform. This research employs normative legal research using statutory, conceptual, and case approaches. Legal materials were collected through library research and analyzed qualitatively using descriptive-prescriptive methods. The findings reveal that corporate criminal liability in corruption cases has a strong normative foundation under Article 20 of the Anti-Corruption Law, Law Number 1 of 2023 concerning the Criminal Code, and Supreme Court Regulation Number 13 of 2016. In the Chromebook procurement case, corporations may be held criminally liable if they are proven to have benefited from the offense and if corporate organs were involved in the decision-making process. Furthermore, the case demonstrates the urgency of public procurement reform through strengthening transparency, digital oversight, corporate compliance culture, and public participation to establish an accountable and integrity-based procurement system.

Keywords: Corporate criminal liability; Corruption; Public procurement; Chromebook

1. Introduction

Corruption is one of the forms of extraordinary crime that not only damages the national economy but also hinders the realization of good governance. It affects economic growth, public trust in government institutions, and the quality of public services within the framework of national development. Consequently, anti-corruption efforts are directed not only at individuals who commit unlawful acts but also at corporations that benefit from corrupt practices.¹

Government procurement of goods and services is one of the sectors most vulnerable to corruption. This sector is highly susceptible to collusion, bid-rigging, bribery, price mark-ups, and conflicts of interest due to the large budgets involved, the complexity of procurement procedures, and the participation of multiple stakeholders. In practice,

¹ Romli Atmasasmita, *Sekitar Masalah Korupsi: Aspek Nasional dan Aspek Internasional* (Bandung: Mandar Maju, 2004), hlm. 1

procurement-related corruption is often carried out by public officials; however, corporations frequently become the primary beneficiaries of such misconduct. As a result, corruption has evolved from an individual crime into a corporate crime, placing corporations within the scope of criminal liability.²

Article 20 of Law Number 31 of 1999, as amended by Law Number 20 of 2001 concerning the Eradication of Corruption Crimes, recognizes corporations as potential perpetrators of criminal offenses. Furthermore, Supreme Court Regulation Number 13 of 2016 concerning Procedures for Handling Criminal Cases Involving Corporations establishes standards for determining corporate fault and outlines procedures for prosecuting corporate entities. This regulation confirms that both corporations and their management may be held criminally liable when corruption is committed by or on behalf of a corporation. Such developments reflect a shift in Indonesia's criminal law paradigm, which now focuses not only on individual accountability but also on those who benefit from criminal acts.³

The issue of corporate criminal liability has become increasingly relevant in light of the alleged corruption in the procurement of Chromebook laptops for the educational digitalization program administered by the Ministry of Education, Culture, Research, and Technology. Initially, the program aimed to support technology-based educational transformation by providing information technology devices to schools across various regions. However, concerns later emerged regarding irregularities in the planning process, determination of technical specifications, and product selection, which potentially resulted in significant financial losses to the state.⁴

Structural corruption in the government procurement sector continues to burden state finances and hinder the delivery of public services. Given the substantial annual budget allocated for public procurement in Indonesia, opportunities for abuse of authority and collusion between government officials and private entities remain significant. One of the most publicly scrutinized cases in recent years is the alleged corruption involving the procurement of Chromebook laptops and Chrome Device Management (CDM) systems for the fiscal years 2019–2022 within the Ministry of Education, Culture, Research, and Technology (Kemendikbudristek).

In this case, state losses were estimated to have reached IDR 2.18 trillion, consisting of approximately IDR 1.56 trillion related to the educational digitalization program and USD 44.05 million (equivalent to approximately IDR 621.39 billion) arising from the procurement of CDM systems deemed economically disadvantageous. The case revealed irregularities in budget planning and allegations of involvement by major corporations in a corruption scheme that prosecutors described as a “light organization.”

The Chromebook case is particularly significant because it illustrates the potential involvement of corporations throughout the procurement chain, from needs assessment and planning to the formulation of technical specifications. In the context of corporate

² Kristian dan Yopi Gunawan, *Tindak Pidana Korupsi: Kajian terhadap Harmonisasi antara Hukum Nasional dan The United Nations Convention against Corruption (UNCAC)* (Bandung: Refika Aditama, 2015), hlm. 102.

³ Indonesia, Undang-Undang Nomor 31 Tahun 1999 tentang Pemberantasan Tindak Pidana Korupsi sebagaimana diubah dengan Undang-Undang Nomor 20 Tahun 2001, Pasal 20.

⁴ Kejaksaan Agung Republik Indonesia, “Penyidikan Dugaan Tindak Pidana Korupsi Program Digitalisasi Pendidikan Pengadaan Chromebook Tahun 2019–2022,” Siaran Pers Kejaksaan Agung, 2025.

criminal law, the participation of corporate organs or executives, as well as the financial benefits obtained by the corporation, are essential factors in determining corporate criminal liability. In other words, evidence in procurement corruption cases should focus not only on public officials as principal offenders but also on corporate entities that derive benefits from the unlawful conduct.⁵

Beyond raising questions concerning corporate punishment, the Chromebook case also highlights structural weaknesses within Indonesia's government procurement system. Procurement mechanisms that are intended to be guided by the principles of efficiency, transparency, fair competition, and accountability as stipulated in Presidential Regulation Number 16 of 2018 in conjunction with Presidential Regulation Number 12 of 2021 concerning Government Procurement of Goods and Services have nevertheless remained vulnerable to abuse of power and conflicts of interest. This situation demonstrates that public procurement reform requires not only improvements in legal regulations but also stronger oversight mechanisms and enhanced integrity among corporations participating in government procurement activities.⁶

On a broader level, the punishment of corporations is not merely intended to create a deterrent effect but also to foster a culture of corporate compliance and promote good corporate governance. Therefore, law enforcement against corporations involved in procurement-related corruption represents a strategic measure for establishing a more transparent, accountable, and public-oriented procurement system.⁷

Based on the foregoing discussion, an examination of corporate criminal liability in government procurement corruption through an analysis of the Chromebook case is both relevant and necessary. This study aims not only to analyze the legal framework governing corporate criminal liability under Indonesian positive law but also to assess the implications of the Chromebook case for the broader agenda of public procurement reform as part of ongoing efforts to prevent and eradicate corruption in a systematic and sustainable manner.

2. Method

This study employs a normative legal research method, focusing on the examination of positive legal norms governing corporate criminal liability in corruption offenses, particularly those related to government procurement of goods and services. Normative legal research is conducted through the analysis of legal materials derived from statutory regulations, court decisions, legal doctrines, and relevant literature concerning the issues under investigation.

This research utilizes three approaches, namely the Statutory Approach, the Conceptual Approach, and the Case Approach. The statutory approach is used to examine the applicable legal framework governing corporate criminal liability and corruption offenses. The conceptual approach is applied to analyze legal theories and doctrines related to corporate criminal responsibility, while the case approach is employed to assess the legal issues arising from the Chromebook procurement corruption case and its implications for public procurement reform.

⁵ Sutan Remy Sjahdeini, *Pertanggungjawaban Pidana Korporasi* (Jakarta: Grafiti Pers, 2007), hlm. 78.

⁶ Indonesia, Peraturan Presiden Nomor 16 Tahun 2018 tentang Pengadaan Barang/Jasa Pemerintah sebagaimana telah diubah dengan Peraturan Presiden Nomor 12 Tahun 2021.

⁷ Mahrus Ali, *Asas-Asas Hukum Pidana Korporasi* (Jakarta: Rajawali Pers, 2017), hlm. 214.

The collected legal materials are analyzed qualitatively using a descriptive-prescriptive method. Through this method, the research not only describes and interprets the applicable legal norms but also provides legal arguments and recommendations regarding the proper application and development of corporate criminal liability in corruption cases involving government procurement.

3. Results and Discussion

3.1 The Construction of Corporate Criminal Liability in Government Procurement Corruption under Indonesian Positive Law

The development of contemporary criminal law has witnessed a significant paradigm shift. Traditionally, criminal law recognized only human beings, or natural persons, as legal subjects. However, corporations are now increasingly acknowledged as perpetrators of criminal offenses. This transformation has become necessary due to the growing complexity of economic crimes committed through corporate organizational structures, rendering it inadequate to impose criminal liability solely upon individual offenders. In this context, corporations are viewed as legal entities capable of generating economic benefits, exercising control over their operations, and potentially causing substantial harm to public interests.⁸

The recognition of corporations as subjects of criminal law in Indonesia has undergone considerable development. Although the Indonesian Criminal Code (KUHP) historically emphasized individual liability, several special statutes have recognized corporations as criminal offenders, including in cases of corruption. This recognition has been further reinforced by Law Number 1 of 2023 concerning the Criminal Code, which explicitly establishes corporations as subjects of criminal offenses and provides the fundamental principles governing corporate criminal liability.⁹

Corporate criminal liability in corruption cases is specifically regulated under Article 20 of Law Number 31 of 1999, as amended by Law Number 20 of 2001 concerning the Eradication of Corruption Crimes. Under this provision, both corporations and their management may be prosecuted and subjected to criminal sanctions when a corruption offense is committed by or on behalf of a corporation. Consequently, the Indonesian legal system adopts a dual liability approach, allowing both the corporation and its executives to be held criminally accountable simultaneously.

The theoretical foundation of corporate criminal liability is supported by several contemporary criminal law doctrines, including the identification theory, vicarious liability theory, and the corporate culture model. The identification theory posits that the intentions and actions of corporate officers occupying strategic positions within a company are attributable to the corporation itself, such that the fault of those officers may be regarded as the fault of the corporation. Meanwhile, the doctrine of vicarious liability is based on the relationship between the corporation and individuals acting on its behalf and within the scope of their authority. The corporate culture model, on the other hand, asserts that a

⁸ Mahrus Ali, *Asas-Asas Hukum Pidana Korporasi* (Jakarta: Rajawali Pers, 2017), hlm. 35

⁹ Barda Nawawi Arief, *Bunga Rampai Kebijakan Hukum Pidana: Perkembangan Penyusunan Konsep KUHP Baru* (Jakarta: Kencana, 2019), hlm. 112.

corporate culture that tolerates or encourages unlawful conduct may serve as a basis for imposing criminal liability on the corporation.¹⁰

In the Indonesian law enforcement system, Supreme Court Regulation Number 13 of 2016 concerning Procedures for Handling Criminal Cases Involving Corporations provides important standards for determining corporate fault. Pursuant to Article 4 paragraph (2) of the Regulation, judges may assess corporate culpability based on several indicators, including whether the corporation obtained benefits or profits from the criminal offense, allowed the offense to occur, or failed to take necessary measures to prevent the commission of the offense.

This framework demonstrates that corporate criminal liability has evolved from a model focused solely on proving individual fault to one that also considers failures in corporate control systems, governance mechanisms, and compliance programs.

Within the context of government procurement of goods and services, corporate involvement frequently manifests through bid-rigging, bribery, collusion, price mark-ups, and manipulation of technical specifications aimed at obtaining unlawful economic benefits. These characteristics indicate that procurement corruption is fundamentally a form of corporate crime occurring within the interaction between business entities and public officials. Accordingly, corporate criminal liability has become an essential instrument for disrupting corruption networks that were previously addressed primarily through the prosecution of individual offenders.¹¹

Recent legal developments indicate that Indonesian legislation provides a sufficiently robust legal basis for holding corporations accountable in corruption cases. Nevertheless, in judicial practice, the primary challenge lies in proving the elements of corporate fault. Contemporary studies suggest that the greatest obstacle to effective corporate law enforcement is not the absence of legal norms but rather the difficulty of establishing corporate mens rea, tracing the flow of corporate benefits derived from criminal conduct, and overcoming the tendency of law enforcement authorities to focus predominantly on individual perpetrators.¹² As a result, corporations that are the actual beneficiaries of corrupt practices often escape criminal sanctions despite having obtained substantial economic advantages from the offenses committed.

¹⁰ Sutan Remy Sjahdeini, *Pertanggungjawaban Pidana Korporasi* (Jakarta: Grafiti Pers, 2017), hlm. 130–143.

¹¹ Galuh Nur Hasanah dan Anita Zulfiani, “Pertanggungjawaban Pidana Korporasi dalam Korupsi Pengadaan Barang dan Jasa Konstruksi,” *Justicia Sains: Jurnal Ilmu Hukum*, Vol. 8, No. 2 (2023), hlm. 548–551.

¹² Adventio Aldi Mawei, “Pertanggungjawaban Pidana Korporasi dalam Tindak Pidana Korupsi Pengadaan Barang/Jasa di Sektor Publik,” *Lex Crimen*, Vol. 14, No. 4 (2026), hlm. 125–129.

3.2 The Application of the Concept of Corporate Criminal Liability in Alleged Procurement Corruption Cases

One of the most significant government procurement corruption cases in recent years is the alleged corruption involving the procurement of Chromebook laptops for the Educational Digitalization Program. This case illustrates the increasingly complex relationship between public officials and corporations in the government procurement process. The program, implemented by the Ministry of Education, Culture, Research, and Technology, was designed to support technology-based educational transformation and was allocated a budget of approximately IDR 9.9 trillion. However, indications have emerged of irregularities in the planning process, approval of technical specifications, and procurement implementation, potentially resulting in substantial financial losses to the state.

The findings of the Attorney General's Office investigation revealed that the initial recommendation of the technical team to utilize Windows-based operating systems was allegedly altered in favor of Chromebooks without adequate research and evaluation. Previous testing had reportedly demonstrated that Chromebook devices were less effective due to limited internet infrastructure in many regions of Indonesia. These circumstances indicate the possibility of abuse of authority and procurement policy manipulation intended to benefit certain parties.¹³

Within the framework of corporate criminal law, the involvement of business entities in procurement corruption may occur through corporate organs, executives, employees, or other parties acting on behalf of and for the benefit of the corporation. Therefore, corporate criminal liability is not limited to the direct actions of the legal entity itself but may also arise from the conduct of individuals whose actions can be attributed to the corporation.¹⁴

Article 20 of Law Number 31 of 1999 in conjunction with Law Number 20 of 2001 concerning the Eradication of Corruption Crimes provides that corporations and/or their management may be prosecuted when a corruption offense is committed by or on behalf of a corporation. Furthermore, Supreme Court Regulation Number 13 of 2016 establishes indicators of corporate fault, including situations where the corporation obtains benefits from the criminal offense, permits the offense to occur, or fails to take adequate measures to prevent the commission of the offense.¹⁵

Applying these parameters to the Chromebook procurement case requires consideration of several factors. First, there is a possibility that certain business entities obtained financial benefits from the determination of technical specifications and the procurement process, which allegedly deviated from the principles of efficiency and fair competition. Such benefits may indicate a connection between the unlawful conduct and the economic advantages received by the corporation.

¹³ Opcit. Mahrus Ali, 141.

¹⁴ Sutan Remy Sjahdeini, *Pertanggungjawaban Pidana Korporasi* (Jakarta: Grafiti Pers, 2017), hlm. 136.

¹⁵ Elisa Hoven, "Corporate Criminal Liability and Compliance Programs," *Journal of Financial Crime*, Vol. 31, No. 2 (2024), hlm. 408–412.

Second, the identification theory may be employed to analyze the involvement of individuals occupying strategic positions in the decision-making process. According to this doctrine, the actions and intentions of senior corporate officers or “directing minds” are regarded as the actions and intentions of the corporation itself. Consequently, misconduct committed by corporate organs may be attributed directly to the corporation. Therefore, if it can be proven that corporate executives or individuals acting in the interests of the corporation participated in procurement manipulation or benefited from the alleged irregularities, the corporation may be held criminally liable.

Third, the corporate culture model may also be applied in examining the Chromebook case. This approach considers a corporation’s compliance system and organizational culture as important indicators of corporate fault. Where a corporation lacks adequate internal controls or allows unlawful practices to occur for the purpose of obtaining financial gain, criminal liability may be imposed upon the corporation. In this sense, the failure to establish an effective compliance framework may itself constitute evidence of corporate culpability.

Nevertheless, law enforcement efforts in this case have largely focused on individuals allegedly involved in procurement decision-making. Several persons connected to the project have been named as suspects; however, imposing criminal liability on corporations as the ultimate economic beneficiaries requires additional evidence demonstrating a clear nexus between the alleged criminal conduct and the profits obtained by the corporation. This situation reflects the continuing challenges faced by Indonesian law enforcement authorities in establishing corporate mens rea and proving the relationship between managerial actions and the benefits acquired by corporate entities.¹⁶

In fact, modern criminal law increasingly recognizes corporations as principal actors in economic crimes capable of causing substantial losses to the state. Therefore, the application of corporate criminal liability in the Chromebook case should not be limited to the prosecution of individual offenders. It should also encompass efforts to trace the economic benefits obtained by business entities and to examine potential failures in corporate compliance systems. Such an approach is consistent with the objectives of corporate punishment, which extend beyond deterrence to include the promotion of a culture of corporate compliance and the implementation of good corporate governance principles.

3.3 Implications of the Chromebook Procurement Case for the Reform of Indonesia’s Public Procurement System

The alleged corruption case involving the procurement of Chromebook laptops for the Educational Digitalization Program not only raises issues of criminal liability for the perpetrators but also reveals structural weaknesses within Indonesia’s public procurement system. Public procurement occupies a strategic position in supporting national development, as it represents one of the sectors with the largest allocation of state expenditure. However, due to its significant economic value, the sector remains highly

¹⁶ Adrianus Meliala dan Mahrus Ali, “Corporate Compliance and Criminal Liability in Indonesia,” *Hasanuddin Law Review*, Vol. 10, No. 1 (2024), hlm. 57–61.

vulnerable to collusion, corruption, conflicts of interest, and abuse of authority. Therefore, the Chromebook case should not merely be understood as a failure of individual actors but rather as an indication of the urgent need for comprehensive reform of the public procurement system.¹⁷

From a normative perspective, government procurement of goods and services in Indonesia is governed by the principles of efficiency, effectiveness, transparency, openness, competition, fairness, and accountability, as stipulated in Presidential Regulation Number 16 of 2018 in conjunction with Presidential Regulation Number 12 of 2021 concerning Government Procurement of Goods and Services.¹⁸ Furthermore, recent regulatory developments have sought to improve the procurement system through the optimization of information technology, simplification of procedures, and enhancement of the electronic catalog system as instruments for promoting transparency and accountability in government procurement. Nevertheless, the Chromebook case demonstrates that sound regulations do not necessarily guarantee effective implementation.¹⁹

One of the most important lessons derived from this case is the need to strengthen the procurement planning stage. Allegations of technical specification manipulation and policy changes that were not based on actual needs suggest that procurement corruption may originate during the planning and needs assessment stages rather than solely during contract execution. Consequently, public procurement reform should not focus exclusively on transparency during the tender process but should also encompass transparency in the identification of needs, formulation of technical specifications, and policy decision-making processes.

The Chromebook case further highlights the importance of strengthening technology-based oversight mechanisms. Over the past several years, electronic procurement systems have contributed to greater efficiency and reduced direct interaction between budget users and suppliers of goods and services. However, the persistence of corruption practices demonstrates that procurement digitalization alone has not been sufficient to prevent collusion and abuse of authority.²⁰ Therefore, future public procurement reforms should prioritize the development of more integrated digital monitoring systems, including the utilization of information technology, data analytics, and real-time supervision mechanisms throughout every stage of the procurement cycle.²¹

¹⁷ Wahyu Mahendra dan Syifa Amania Afra, "Pengadaan Elektronik dan Reformasi Administrasi: Studi Kasus di Korea Selatan, Indonesia, dan India," *Jejaring Administrasi Publik*, Vol. 14, No. 1 (2022), hlm. 46–48.

¹⁸ Indonesia, Peraturan Presiden Nomor 16 Tahun 2018 tentang Pengadaan Barang/Jasa Pemerintah sebagaimana telah diubah dengan Peraturan Presiden Nomor 12 Tahun 2021.

¹⁹ Ilham Choiri dan Hendra Hadi, "Analisis Pengaruh Regulasi Terbaru Perpres Nomor 46 Tahun 2025 dan Sistem E-Katalog V.06 terhadap Nilai Efektif, Efisien, Akuntabilitas dan Transparansi pada Pengadaan Barang/Jasa Pemerintah," *Jurnal Pengadaan Barang dan Jasa*, Vol. 4, No. 2 (2025), hlm. 88–92.

²⁰ Ni Luh Gede Wulandari, "Analisis Hukum Kasus Korupsi Pengadaan Laptop Chromebook 2025 Terkait Tanggung Jawab Administratif dan Pidana," *Syntax Literate: Jurnal Ilmiah Indonesia*, Vol. 10, No. 11 (2025), hlm. 623–628.

²¹ Irwan Nugraha dan Ahmad Baihaqi Midhol, "Penerapan Prinsip Good Governance dan Celah Korupsi dalam Pengadaan Barang dan Jasa Pemerintah Secara Elektronik (E-Procurement) di Indonesia," *Jurnal Administrasi Pemerintahan Desa*, Vol. 5, No. 1 (2025), hlm. 14–18.

In addition, the case underscores the importance of implementing the principles of good governance and good corporate governance in the relationship between government institutions and private-sector entities. Procurement corruption fundamentally arises from interactions between public officials and private business actors. As such, corruption prevention should not be viewed solely as the responsibility of law enforcement agencies. Corporations must also demonstrate a commitment to fostering a culture of corporate compliance and maintaining effective internal control systems.²²

The Chromebook case likewise encourages the adoption of the concept of open contracting, which emphasizes transparency and accessibility of information throughout the entire procurement cycle, from planning and contract implementation to the evaluation of procurement outcomes. Greater transparency reduces opportunities for corruption and conflicts of interest by enabling oversight from the public, the media, academic institutions, and civil society organizations.²³

Furthermore, the case illustrates the necessity of strengthening inter-agency cooperation in preventing and combating procurement-related corruption. Effective coordination among law enforcement agencies, the Audit Board of Indonesia (BPK), the Corruption Eradication Commission (KPK), and the National Public Procurement Agency (LKPP) is essential to ensuring an integrity-based procurement system.²⁴

From the perspective of contemporary economic criminal law, the punishment of corruption offenders should be viewed not as an end in itself but as part of a broader effort to achieve good governance and strengthen public institutions. Accordingly, public procurement reform should adopt a more preventive approach by emphasizing transparency, integrity, and accountability at every stage of the procurement process. This approach is consistent with the principle of value for money, which places the efficient utilization of public funds as the primary objective of government procurement activities.²⁵

4. Conclusion

The construction of corporate criminal liability in government procurement corruption under Indonesian positive law is fundamentally supported by a strong normative framework through the Law on the Eradication of Corruption Crimes, Law Number 1 of 2023 concerning the Indonesian Criminal Code, and Supreme Court Regulation Number 13 of 2016. This framework adopts a dual liability system, recognizing corporations as subjects of criminal law that may be held criminally liable when a criminal offense is committed for the benefit of, or provides an advantage to, the corporation.

²² Elisa Hoven, "Corporate Criminal Liability and Compliance Programs," *Journal of Financial Crime*, Vol. 31, No. 2 (2024), hlm. 408–412

²³ Aji Baskoro, "Combating Corruption in Procurement: The Synergy of Law Enforcement, Civil Society, and Digital Oversight," *Jurnal Pengadaan Indonesia*, Vol. 4, No. 1 (2025), hlm. 30–34.

²⁴ Irfan Syafar, Nurharsya Khaer Hanafie, dan Herman, "Implementasi Kerangka Hukum Pengadaan Barang dan Jasa Pemerintah: Analisis Tantangan dan Inovasi Pencegahan Korupsi di Indonesia," *Supremasi*, Vol. 20, No. 2 (2025), hlm. 171–176.

²⁵ Amalia Safitri, "Peran Perancangan Kontrak Pengadaan Barang dan Jasa untuk Mencegah Praktik Korupsi," *ISO: Jurnal Ilmu Sosial, Politik dan Humaniora*, Vol. 5, No. 1 (2025), hlm. 15–18.

The application of the concept of corporate criminal liability in the Chromebook procurement case essentially depends on proving that the alleged criminal act was committed in the interests of the corporation, that the corporation obtained economic benefits from the offense, and that corporate organs or individuals acting on behalf of the corporation were involved in the commission of the unlawful conduct. Where these elements can be established, the corporation, as a legal entity, may be subjected to criminal liability in accordance with applicable laws and regulations.

Furthermore, the Chromebook procurement case has significant implications for the reform of Indonesia's public procurement system. The case demonstrates that combating procurement-related corruption cannot rely solely on repressive law enforcement measures. Rather, it requires comprehensive improvements in procurement governance through enhanced transparency, the digitalization of oversight mechanisms, the strengthening of corporate compliance culture, and the optimization of public participation. These measures are essential to establishing a more accountable, transparent, and integrity-based public procurement system capable of preventing corruption and safeguarding the effective use of public resources.

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