ISO 37001:2025-02 (E)

Anti-bribery management systems - Requirements with guidance for use

Contents

Page

Foreword v

Introduction viii

1 Scope 1

2 Normative references 1

3 Termsanddefinitions 1

4 Context of the organization 6
4.1 Understanding the organization and its context 6
4.2 Understanding the needs and expectations of interested parties 6
4.3 Determining the scope of the anti-bribery management system 7
4.4 Anti-bribery management system 7
4.5 Bribery risk assessment 7

5 Leadership 8
5.1 Leadership and commitment 8
5.1.1 Governing body 8
5.1.2 Top management 8
5.1.3 Anti-bribery culture 9
5.2 Anti-bribery policy 9
5.3 Roles, responsibilities and authorities 10
5.3.1 General 10
5.3.2 Anti-bribery function 10
5.3.3 Delegated decision-making 10

6 Planning 11
6.1 Actions to address risks and opportunities 11
6.2 Anti-bribery objectives and planning to achieve them 11
6.3 Planning of changes 12

7 Support 12
7.1 Resources 12
7.2 Competence 12
7.2.1 General 12
7.2.2 Employment process 12
7.3 Awareness 13
7.3.1 Awareness of personnel 13
7.3.2 Training for personnel 13
7.3.3 Training for business associates 14
7.3.4 Awareness and training programmes 14
7.4 Communication 14
7.5 Documented information 15
7.5.1 General 15
7.5.2 Creating and updating documented information 15
7.5.3 Control of documented information 15

8 Operation 16
8.1 Operational planning and control 16
8.2 Due diligence 16

8.3 Financial controls 16
8.4 Non-financial controls 16
8.5 Implementation of anti-bribery controls by controlled organizations and by business associates 17
8.6 Anti-bribery commitments 17
8.7 Gifts, hospitality, donations and similar benefits 18
8.8 Managing inadequacy of anti-bribery controls 18
8.9 Raising concerns 18
8.10 Investigating and dealing with bribery 18

9 Performance evaluation 19

9.1 Monitoring, measurement, analysis and evaluation 19
9.2 Internal audit 19
9.2.1 General 19
9.2.2 Internal audit programme 20
9.2.3 Audit procedures, controls and systems 20
9.2.4 Objectivity and impartiality 20
9.3 Management review 20
9.3.1 General 20
9.3.2 Management review inputs 21
9.3.3 Management review results 21
9.4 Review by anti-bribery function 21

10 Improvement 22
10.1 Continual improvement 22
10.2 Nonconformity and corrective action 22

Annex A (informative) Guidance on the use of this document 23

Bibliography 46