

ISO 37001:2025 Overview and Guidance

Introduction

The **ISO 37001:2025 Anti-bribery management systems** standard details the requirements for an anti-bribery management system which is designed to detect, discourage and prevent bribery.

The standard lists measures that organisations should have in place to deal with bribery and this includes establishing an anti-bribery function, roles, responsibilities and authorities, an anti-bribery culture, anti-bribery risk assessments, training, awareness and operational controls.

The standard stipulates that there should be adequate resources in place to establish an anti-bribery management system which is effective, supported by internal audits and management reviews. The establishment of the **anti-bribery function** is also intended to review the organisations behaviour and overall bribery risk, ensuring it conforms to the requirements of the standard, reporting to any applicable governing bodies and providing advice and guidance.





Bribery Risk Assessment

The organisation is required to carry out a bribery risk assessment at planned intervals which cover the following:

- Lists the bribery risks that can be reasonably expected
- Assesses, analyses and prioritises the bribery risks
- Evaluates the suitability and effectiveness of the controls in place

The bribery risk assessment must also establish criteria for reviewing the levels of bribery risk faced and must also be reviewed at planned intervals or upon any significant changes

Leadership and Governing Body

The standard sets out the requirements for the organisations leadership and this includes the governing body (if there is one) and top management.

If a **governing body** exists, it is responsible for:

- approving the anti-bribery policy and ensuring it is aligned with the overall anti-bribery strategy
- receiving and reviewing information regarding the content and operation of the anti-bribery management system

The requirements for **top management** include but are not limited to:

- ensuring the establishment of the anti-bribery policy and objectives
- ensuring the integration of the anti-bribery management system into business processes
- communicating the importance of effective anti-bribery management
- promoting an anti-bribery culture and continual improvement

Anti-bribery function

The standard requires an anti-bribery function to be established which oversees the following but is not limited to:

- Ensuring the anti-bribery management system meets **ISO 37001**
- Reporting on the performance of the **ABMS** to the governing body / management
- Overseeing the design and implementation of the **ABMS**

The anti-bribery function can be delegated to an external body.

Overall Requirements

The general overall requirements for the **ISO 37001:2022** standard includes the following:

- Planning – **actions to address risks and opportunities**
- **Anti-bribery objectives** and planning to achieve them
- Planning of changes
- Support and Resources
- Competence of staff who affect **anti-bribery performance**
- Employment **process which stipulates conditions requiring compliance with anti-bribery policy and anti-bribery management system (ABMS)**
- Awareness of personnel regarding the anti-bribery policy, procedures and ABMS
- Provision of training for personnel
- Training for **business associates – declarations of compliance and assessment of individual bribery risk**
- Communication
- Documented information (**creation, control and update**)
- Operational planning and control
- Due diligence – **bribery risks and transaction risks**
- Financial controls – **limits on spending/authorization**
- Non-financial controls
- Anti-bribery commitments – from **high-risk business associates and staff**
- **Gifts, hospitality, donations and other similar benefits** – controls regarding what's accepted and risk
- Managing inadequate anti-bribery controls
- Raising concerns – **non-penalisation for genuine concerns of bribery**
- Investigating and dealing with bribery
- Performance evaluation
- Internal audit

- Management review
- Review by **anti-bribery compliance function**
- Continual improvement of the ABMS

Presenting evidence during the audit

For guidance on the audit process and how to prepare for the audit and an overview of the audit plan and the certification audit process please review the **Certification Audit Guidance** which is available [online here](#).

In an audit involving a site visit, the auditor will likely just view evidence in person, whilst asking questions, a site tour may also be conducted. For remote audits it is often requested that photographs / videos are submitted as evidence.

Further support

- Management system documentation & resources: isomanaged.com/alphazdocuments
- Remote support: isomanaged.com/iso-consultancy-support
- ISO Consultancy: isoassured.co.uk/iso-consultancy