

ISO 37001

Anti-bribery management system

A quick guide to understanding the requirements



ISO 37001 provides organizations with a structured management system to prevent bribery, promote transparency, and uphold the highest standards of ethical conduct

Published in 2016 to address the increasing global challenges of bribery and corruption, ISO 37001 is recognized as the world's first international anti-bribery management system standard. It assists organizations not only in meeting legal and regulatory obligations but also in establishing structured processes and effective controls designed to protect the organization from bribery risk.

The standard provides customers, investors, and other interested parties with improved assurance of an organization's dedication to ethical conduct and compliance. It helps them gain greater confidence that the organization operates responsibly and maintains strong anti-bribery practices.

ISO 37001 is suitable for businesses of any size and across all sectors—private, public, or non-profit. Its flexible design enables organizations to adapt the framework to their unique structure, operational complexity, and exposure to bribery risk.

With extensive global expertise, G.E.N.S Management Consultancy Pte Ltd ensures that organizations gain full value through implementation of ISO 37001.

This guide provides practical direction for implementing ISO 37001 in your organization and ensuring sustained performance over time. It also highlights the additional support services offered by G.E.N.S Management Consultancy Pte Ltd to enhance resilience, encourage continual improvement, and strengthen long-term organizational integrity.

Understanding How ISO 37001 Operates and the Benefits It Brings to Your Business

In increasingly complex business landscape, integrity and transparency are indispensable foundations for sustainable success. Organizations are actively seeking structured and effective measures to prevent, detect, and address bribery and corruption. ISO 37001 serves as a critical framework, providing a systematic approach to establishing, implementing, maintaining, and improving an anti-bribery management system.

This guide provides a comprehensive overview of how to integrate ISO 37001 into your organization's governance framework to enhance compliance, build trust, and support long-term business resilience. It also introduces our professional support services, designed to guide your organization through certification and ensure continual improvement in alignment with global best practices.

What is ISO 37001?

ISO 37001 is an internationally recognized standard developed by the International Organization for Standardization (ISO) aimed at providing a comprehensive framework to assist organizations in preventing, detecting, and addressing bribery and corruption in all their forms. This standard offers practical and clear guidance for establishing an effective anti-bribery management system adaptable to any organization, regardless of size, industry, or location.

To comply with ISO 37001, organizations must implement a formal anti-bribery policy, demonstrate ongoing commitment to its continual improvement, and ensure it remains current and integrated within the broader compliance framework. It is essential to recognize, however, that the standard cannot fully control human behavior and therefore does not guarantee that individuals within the organization will not be offered bribes, engage in bribery, or face legal consequences pursuant to their actions and applicable laws.

BENEFITS OF ISO 37001



Improved Reputation: Adopting ethical and transparent practices enhances the organization's reputation in the market, among its employees, and with business partners.



Legal Compliance: The standard helps organizations comply with laws and regulations related to bribery and corruption in different jurisdictions.



Risk Reduction: By identifying and addressing bribery risks, organizations can avoid legal issues, sanctions, and loss of business.



Competitiveness: Companies that implement ISO 37001 stand out in the market by demonstrating their commitment to integrity and ethics.



Improved Stakeholder Relations: Customers, investors, and business partners trust organizations with a strong anti-bribery management system.



Operational Efficiency: The standard encourages the optimization of internal processes and risk reduction, resulting in more efficient operations.

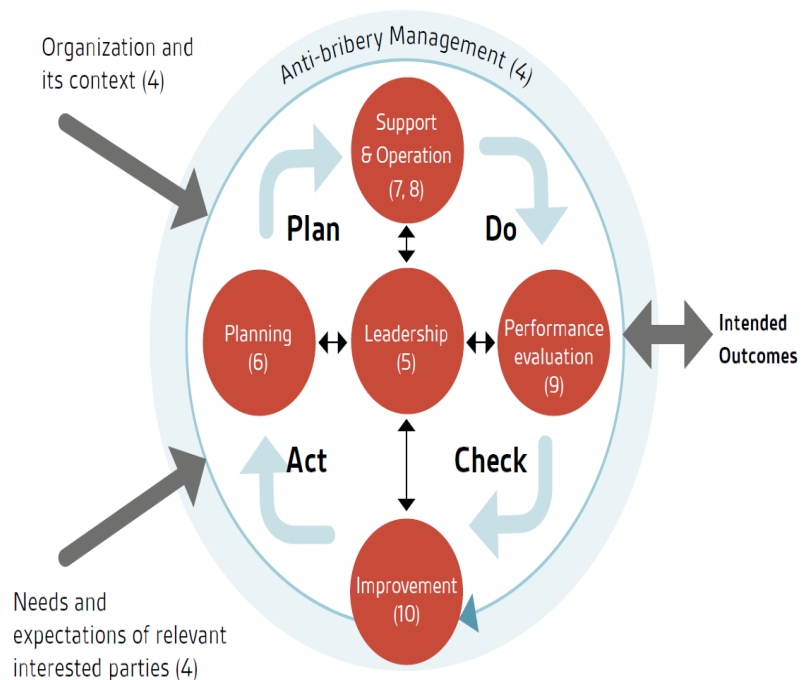
HOW ISO 37001 WORKS FOR YOU

ISO 37001 is based on the high-level structure (Annex SL) which is a common framework for all SO management systems ensuring consistency align different management system standards, offer matching sub-clauses against the top level structure and apply common language across all standards.

It makes it easier for organizations to incorporate their Anti-bribery Management System (ABMS), into core business

Processes make efficiencies, and get increased involvement from senior management.

Plan-Do-Check-Act (PDCA) is the Operating principle of ISO 37001.



It's applied to all processes and the QMS as a whole. This diagram shows how clauses 4 to 10 of ISO 37001 can be grouped in relation to PDCA



Some of the terms & definitions used in ISO 37001

Terms	Definitions
Context of the organization	Consider the combination of internal and external factors and conditions that are relevant to the objectives of the organization's ABMS.
Bribery	Offering, promising, giving, accepting or soliciting of an undue advantage of any value, in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties
Interested parties	A person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity. Examples include suppliers, customers or competitors. You may refer to them as stakeholders
Top management	A person or group of people who directs and controls an organization at the highest level.
Governing body	The group or body that has ultimate responsibility and authority for an organization's activities, governance and policies and to which top management reports and by which top management is held accountable. (Where this is the case, it could be, for example, a board of directors, trustees, etc.)
Business associate	Any external party with whom the organization has, or plans to establish some form of business relationship.
Public official	Not all examples will exist in all jurisdictions, but could include public office holders at national, state/provincial or municipal level, including members of legislative bodies, executive holders and the judiciary
Documented information	Information that must be controlled and maintained by an organization and the medium on which it is contained. It can be in any format
Nonconformity and corrective action	Non-fulfilment of a requirement, and the action to eliminate the cause of a non-conformity.

KEY REQUIREMENTS OF ISO 37001

Clause 1: Scope

This clause details the scope of the standard associated with bribery. It is not applicable to other subjects such as fraud, cartels, money-laundering

Clause 2: Normative References

There are no normative references in this document

Clause 3: Terms and definitions

This clause references the terms and definitions that need to be understood in relation to this standard.

Clause 4: Context of the organization

This clause focuses on the identification and understanding of factors essential to the establishment and maintenance of an effective Anti-Bribery Management System (ABMS). It emphasizes the alignment of the ABMS with the organization's strategic direction and operating environment. Specifically, this clause requires the organization to:

- Determine external and internal issues that are relevant to the ABMS and that may influence its intended outcomes.
- Identify interested parties and evaluate their needs, expectations, and relevance to the ABMS.

- Assess how these contextual elements impact the effectiveness and objectives of the ABMS.
- Define the scope of the management system in consideration of identified issues, stakeholder interests, and strategic priorities.
- Ensure that the ABMS remains consistent with and supportive of the organization's overall business strategy.



Clause 5 – Leadership

This clause outlines the responsibilities of top management in establishing, implementing, and sustaining an effective Anti-Bribery Management System (ABMS). It emphasizes the integration of anti-bribery principles into the organization's governance and operational framework to ensure ethical leadership and accountability. Specifically, the clause requires top management to:

- Demonstrate leadership and commitment by integrating ABMS requirements into business processes and aligning anti-bribery objectives with the organization's strategic direction.
- Establish, approve, and communicate the anti-bribery policy, ensuring it is understood, implemented, and maintained across all relevant levels and functions.
- Promote an organizational culture of integrity that supports anti-bribery values, ensuring that reports of suspected violations made in good faith are protected from retaliation, discrimination, or disciplinary action.
- Assign responsibility for implementing and managing the ABMS to a designated anti-bribery compliance function that is appropriately resourced and competent to perform its duties.
- Ensure that the compliance function has direct access to the governing body (where applicable) to raise issues or concerns regarding the ABMS without undue influence or interference.
- Permit portions or all responsibilities of the compliance function to be delegated externally, where appropriate, while retaining ultimate accountability within the organization.

Clause 6 – Planning

This clause establishes the requirements for planning actions to address identified bribery risks and opportunities to ensure that the Anti-Bribery Management System (ABMS) achieves its intended results. It emphasizes a structured, risk-based approach to planning that is proportionate to the nature and scale of the organization's operations. Specifically, this clause requires the organization to:

- Plan actions to address risks and opportunities consistent with the internal and external context defined under Clause 4, ensuring that potential impacts are evaluated and prioritized based on their significance.
- Categorize risks, where appropriate, according to their potential impact (e.g., low, medium, high) and refrain from undertaking activities where bribery risks cannot be effectively managed or mitigated.
- Integrate and implement the planned risk mitigation measures into business processes and continually monitor their effectiveness.
- Establish, where practicable, measurable anti-bribery objectives that align with the organization's policy, strategic direction, and compliance commitments.
- Communicate, monitor, and regularly review the objectives to ensure continued relevance and effectiveness.
- Maintain documented information on anti-bribery objectives and related planning processes as evidence of compliance with the ABMS requirements.

Clause 7 – Support

This clause establishes the requirements for providing adequate support necessary to implement, operate, and continually improve the Anti-Bribery Management System (ABMS). It ensures that the organization has the appropriate resources, competencies, awareness, communication mechanisms, and documented information to sustain effective anti-bribery controls. Specifically, this clause requires the organization to:

- Determine and provide sufficient resources—including personnel, infrastructure, and financial means—needed to establish, maintain, and enhance the ABMS in alignment with operational objectives.
- Identify and ensure the competence of personnel performing tasks that affect the organization's anti-bribery performance, maintaining documented evidence of qualifications, experience, and training.
- Conduct due diligence on all individuals in positions of more than low bribery risk, including pre-employment screening, transfers, or promotions, to confirm integrity and suitability.
- Review and manage performance incentives and bonuses to prevent structures that could encourage or conceal bribery-related behaviour.
- Provide awareness and training on anti-bribery policies and procedures to personnel and business associates proportionate to their level of bribery risk exposure.
- Ensure all awareness content, communications, and training materials are up to date, accessible, and protected, aligning with information

security and confidentiality requirements.

- Establish effective internal and external communication channels for sharing ABMS-related information, ensuring clarity, consistency, and accessibility.
- Maintain documented information required by ISO 37001 and determined as necessary for the effectiveness of the ABMS; ensure its control, protection, and proper retention throughout its lifecycle.

Clause 8 – Operation

This clause defines the operational requirements necessary to implement, control, and maintain an effective Anti-Bribery Management System (ABMS). It focuses on embedding anti-bribery processes into day-to-day operations through due diligence, financial controls, and non-financial controls to proactively manage bribery risks. Specifically, this clause requires the organization to:

- Plan, implement, and control operational processes necessary to meet ABMS requirements and ensure that measures identified in risk assessments (Clause 6) are effectively applied across relevant functions and activities.
- Conduct due diligence where bribery risk is assessed as more than low—including on specific transactions, projects, activities, or business associates—to determine whether to establish, maintain, or discontinue the relationship.
- Implement appropriate financial controls to restrict opportunities for bribery, such as segregation of duties, approval limits, and transparent accounting practices.

- Establish non-financial controls addressing bribery risk in areas such as procurement, sales, human resources, and legal or regulatory interactions.
- Apply anti-bribery procedures to controlled and influenced organizations (e.g., subsidiaries or suppliers) to manage supply chain risks, including controls on gifts, hospitality, donations, and similar benefits where impropriety could be perceived.
- Integrate anti-bribery commitments and clauses into contracts and agreements with business associates as part of the organization's due diligence and compliance obligations.
- Establish mechanisms for reporting and raising concerns, ensuring that both internal and external parties can report suspected bribery confidentially and anonymously, without fear of retaliation or discrimination.
- Ensure that all operational procedures and control measures are reviewed, documented, and updated to reflect changes in operations, risk exposure, or external conditions.

Clause 9: Performance evaluation

This clause establishes the requirement for organizations to monitor, measure, analyze, and evaluate the performance and effectiveness of the Anti-Bribery Management System (ABMS). It ensures that the ABMS remains robust, appropriate, and capable of achieving its intended outcomes through systematic performance assessment. Specifically, the clause requires the organization to:

- Determine what needs to be measured and monitored, including relevant anti-bribery processes, controls, and objectives; define the frequency, methods, and responsibilities for collecting, analyzing, and reporting data.
- Ensure that the monitoring and evaluation methods are valid, reliable, and proportionate to the scale and complexity of the organization's bribery risks.
- Conduct internal audits at planned intervals that are risk-based, objective, and independent, ensuring that audit findings provide an accurate view of ABMS performance and areas requiring improvement.
- Perform management reviews at defined intervals to assess ABMS suitability, adequacy, and effectiveness against strategic objectives and compliance commitments.
- Maintain documented evidence of internal audits, management reviews, and performance analyses to demonstrate conformity with ISO 37001 requirements and support transparency.
- Ensure that the governing body or equivalent oversight function

periodically reviews ABMS performance and outcomes, confirming that governance decisions remain informed and accountable.

- Require the anti-bribery compliance function to review performance trends and report significant findings, including recommendations for corrective action or system enhancement.



Clause 10 – Improvement

This clause establishes the requirement for organizations to identify, implement, and document actions that drive continual improvement within the Anti-Bribery Management System (ABMS). It focuses on responding effectively to nonconformities and ensuring that corrective actions prevent their recurrence or occurrence elsewhere. Specifically, the clause requires the organization to:

- Identify and react promptly to nonconformities when they occur by controlling, correcting, and addressing any resulting consequences in a timely and proportionate manner.
- Evaluate the need for corrective actions to eliminate the root causes of nonconformities to prevent recurrence or similar potential occurrences, using structured root cause analysis and review mechanisms.
- Implement corrective actions that are appropriate to the impact and nature of the nonconformity, and verify the effectiveness of those actions through follow-up evaluation.
- Update and modify the ABMS, where necessary, to reflect lessons learned and improvements derived from the analysis of nonconformities, audit findings, feedback, or risk evaluations.
- Maintain documented information as evidence of the nature of the identified nonconformities, actions taken, and results of corrective measures to ensure transparency and traceability.
- Identify opportunities for continual improvement, with the aim of enhancing the overall suitability, adequacy, and effectiveness of the ABMS in achieving its anti-bribery objectives.

To maximize the effectiveness of your Anti-Bribery Management System (ABMS), here are some best practices:



Establish clear anti-bribery policies and communicate them across the organization



Establish clear anti-bribery policies and communicate them across the organization



Conduct regular risk assessments to identify bribery risks and update controls accordingly



Conduct internal audits and management reviews to ensure compliance and identify areas for improvement.



Implement robust due diligence for third parties, including suppliers, partners, and agents



Encourage a culture of reporting and whistleblowing, ensuring confidentiality and protection for reporters.



Provide ongoing training and awareness programs for employees and management.



If you are looking for a consultant to assist you with a new or existing management system, G.E.N.S Management Consultancy Pte Ltd can help!



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