Dr KM Loi, has been appointed as the Vice Chair of ISO/PC 278, a Project Committee which was responsible for the design and development of ISO 37001:2016 – Anti-Bribery Management System (ABMS) standard.

With a long-standing background in anticorruption work since 2000, he has served as Deputy President (2015-2017) and Secretary-General (2013-2015) of Transparency International Malaysia and also a Vice Chair of UNCAC Coalition (2015-2017). He is also a certified ISO 37001:2016 Tutor and Lead Auditor. He has been involved in ISO standard development since 1995 and represented Malaysia as expert in ISO/TC 176 (ISO 9001-QMS); ISO/TC 207 (ISO 14001-EMS); ISO/TMB/WG Social Responsibility (ISO 26000). He has also attended an Advanced Training program in Total Quality Management under SIDA programme (Sweden).
Chairman, National Technical Committee ISO/TC 207 SC1 (EM System) and SC2 (EM Auditing)
ISO/PC 278 (ABMS) Vice-Chair / Malaysian Delegate
ISO/TC 207 (EMS) Expert / Malaysian Delegate
ISO/TC 176 (QMS) Expert / Malaysian Delegate
ISO/TMB WG Social Responsibility Expert

Vice-Chairman of Technical Committee of Prime Minister’s Hibiscus Award Deputy Convener of MICCI Environment Council

Adjunct Faculty Member of Othman Yeop Abdullah Graduate School of Business, Universiti Utara Malaysia (Northern University of Malaysia).

Fellow of Institute Quality Malaysia (FiQM)
Fellow of Quality Society for Australasia (FQSA)

Former President – Mountaineering Association of Malaysia
Former Vice - President and Hon. Secretary of the Institute of Quality Control Malaysia (IQCM).
Former Member of Malaysian Standard Committee – DSM.
Ex-Vice President of British Graduates Association of Malaysia.
Ex-Deputy President & Secretary-General of Transparency International Malaysia.
Ex-Vice Chair – UNCAC Coalition

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ISO 37001:2016 AMBS
INTRODUCTION COURSE

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Although the information provided here is meant to give an accurate briefing and understanding on the “ISO 37001” requirements based on the knowledge, experience and judgement of the standard expert.

Any opinion, view and/or other information expressed by the standard expert here merely shared his technical expertise, thoughts and his involvement with the requirements and is provided on an “as is” basis and/or any part thereof is suitable for you or fitness for a particular purpose only.

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International Organization for Standardization

Promotes the development of technical standards, standardization and related activities in the world.


Total: 162 Country members
478 Technical Committees
521 Subcommittees
2,592 Working Groups
21,861* Standards

*At August 201
Who develops ISO standards?

Technical / Project Committees comprising experts on loan from the industrial, technical and business sectors which have asked for the standards, and which subsequently put them to use.

These experts may be joined by others with relevant knowledge, such as representatives of government agencies, testing laboratories, consumer associations, environmentalists, and so on.

These experts participate as national delegations, chosen by the ISO national member institute for the country concerned.

These delegations are required to represent not just the views of the organizations in which their participating experts work, but of other stakeholders too.
ISO Technical / Project Committee

Since 1947, some 309 Technical / Project Committees were established starting with TC 1 – Screw Threads until TC 309 – Governance of Organizations.

When a technical committee is dissolved its number is not allocated to another technical committee.

Technical / Project committees have been dissolved:

3, 7, 9, 13, 15, 16, 32, 40, 49, 50, 53, 55, 56, 57, 62, 64, 65, 66, 73, 75, 78, 80, 88, 90, 95, 97, 99, 103, 124, 125, 139, 140, 141, 143, 151, 169, 187 and 200.

Stages of Standards

The national delegations of experts of a technical committee meet to discuss, debate and argue until they reach consensus on from a working draft to committee draft to an agreement where it is then circulated as a Draft International Standard (DIS) to ISO’s membership as a whole for comment and balloting.

Many members have public review procedures for making draft standards known and available to interested parties and to the general public.
**Stages of Standards**

The ISO members then take account of any feedback they receive in formulating their position on the draft standard.

If the voting is in favour, the document, with eventual modifications, is circulated to the ISO members as a **Final Draft International Standard (FDIS)**.

If that vote is positive, the document is then published as an **International Standard**.

**Recommended Timeframe**

<table>
<thead>
<tr>
<th>Project stage</th>
<th>Milestones</th>
<th>Sub-stage</th>
<th>Project time</th>
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<td>Approval stage</td>
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<td>Publication stage</td>
<td>Publication of International Standard (IS)</td>
<td>60.60</td>
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</table>
Other ISO Deliverables

For some users of standards, particularly those working in fast-changing technology sectors, it may be more important to agree on a technical specification and publish it quickly, before going through the various checks and balances needed to win the status of a full International Standard.

Therefore, to meet such needs, ISO has developed a new range of "deliverables", or different categories of specifications, allowing publication at an intermediate stage of development before full consensus: Publicly Available Specification (PAS), Technical Specification (TS), Technical Report (TR), International Workshop Agreement (IWA).

Business Lost due to Bribery

According to a Transparency International study in 2011, 27.0% of the 3,016 business people surveyed across 30 countries reported that they had lost business due to bribery by their competitors. What's more, damage caused by bribery to countries, organizations and individuals:

1. Lowers economic growth
2. Discourages investment
3. Marginalizes and restricts global markets
4. Erodes support for economic aid
5. Puts a heavy economic burden on the poor
6. Lowers the standard of living of the people
ISO 37001:2016 AMBS
INTRODUCTION COURSE

Management System Control

At the organizational level, bribery affects tendering and contract implementation, and increases costs and risks.

Organizations can help address this issue by implementing anti-bribery management controls equivalent to those for quality, environmental and safety.

BS 10500

In 2011, BSI Standards published British Standard (BS) 10500: Anti-bribery Management System, which was developed by a working group of 30 experts from the public and private sector and representing several different industry sectors.

BS 10500 is intended to help an organisation to implement an effective anti-bribery management system.
BS 10500 Certified Organizations

Balfour Beatty, 50 countries – 50,000  
Network Rail Consulting Ltd – 36,000  
Morgan Sindall Group – 2,042  
Mabey Bridge Ltd, UK - 500  
Smith & Ouzman, UK - 100  
Collinson Hall, Hertfordshire - 24

ISO/PC 278

Responsible for developing of ISO 37001:  
Anti-bribery Management Systems -  
Requirements with guidance for use  
Chairperson : Mr Neill Stansbury  
Vice Chair : Dr KM Loi  
Secretary: Mr. Mike Henigan  
Secretariat – British Standards Institute
ISO 37001:2016 AMBS

ISO 37001 ABMS

- ISO 37001: ABMS strives to meet this current vacancy in the efforts to curb bribery, by allowing for organizations to incorporate a management system that is intended to evaluate and improve current compliance practices.

- While it is not meant to address any other corrupt practices, such as fraud, cartels, anti-trust/competition offences, or money-laundering, an organization can choose to extend the scope of the management system to include such activities.

ISO/PC 278

- Participating countries (37): Australia, Austria, Brazil, Cameroon, Canada, China, Colombia, Croatia, Czech Republic, Denmark, Ecuador, Egypt, France, Germany, Guatemala, India, Iraq, Israel, Kenya, Lebanon, Malaysia, Mauritius, Mexico, Morocco, Nigeria, Norway, Pakistan, Saudi Arabia, Serbia, Singapore, Spain, Sweden, Switzerland, Tunisia, UK, USA, Zambia.

- Observing countries (22): Argentina, Armenia, Bulgaria, Chile, Cyprus, Cote d'Ivoire, Finland, Hong Kong, Hungary, Italy, Japan, Korea, Lithuania, Macau, Mongolia, Netherlands, New Zealand, Poland, Portugal, Russia, Thailand, Uruguay.

ISO 37001:2016 – ISO/PC 278

Objective and background

• To develop ISO anti-bribery management standard for public, private and non-profit sector. Generic and applicable to all sizes & types of organizations

Participating entities

• Multiple countries including:
  - United Kingdom
  - Spain
  - United States
  - Malaysia
  - Mexico

Approach

• 85 experts working towards this International Standard

Publication

• October 2016


ISO 37001:2016 Development Process

0. London, UK

1. Madrid Spain
   25 – 27 March 2014

2. Miami, USA
   25 – 27 March 2014

3. Paris, France
   28 Sept – 02 Oct 2015

4. Kuala Lumpur Malaysia
   30 May – 03 June, 2016

5. Mexico City Mexico
   23 – 27 March 2016
ISO 37001:2016 Development Process

- International ballot agreed the need for revision
- There are several distinct stages when developing an ISO standard; the key ones being:
  1. Working Drafts (WDs)
  2. Committee Draft (CD)
  3. Draft International Standard (DIS)
  4. Final Draft International Standard (FDIS)
  5. International Standard (IS)

The standard is published after approval of the CIB IS by participating national standards bodies and is reviewed at regular intervals after then.
ISO 37001:2016 was published and released on October 14, 2016 – 47th World Standards Day 2016
What is ISO 37001:2016?

- It is designed to help an organization establish, implement, maintain, and improve an anti-bribery compliance program or “management system.”

- It includes a series of measures and controls that represent global anti-bribery good practices.

- Now, there is an internationally-recognized minimum set of measures for an organisation to have in place to prevent, detect and response to bribery.

Who can use ISO 37001:2016?

The standard is flexible and can be adapted to a wide range of organizations, including:

- Large organizations
- Small & medium sized enterprises (SMEs)
- Public, SOEs and private organizations
- Non-governmental organizations (NGOs)

The standard can be used by organizations in any country.
What does ISO 37001 address?

- Bribery in the public, private and not-for-profit sectors;
- (Active) Bribery by the organization or by its personnel or business associates acting on its behalf or for its benefit;
- (Passive) Bribery of the organization or of its personnel or business associates in relation to the organization’s activities;
- Direct and indirect bribery (e.g. a bribe offered or accepted through or by a third party)

Bribery Risks

“Bribery” is the offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), 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.

“Bribery” is defined by the anti-bribery law applicable to the organization and anti-bribery management system designed by the organization.
Does ISO 37001 defines bribery?

Bribery can take place in or through any location, it can be of any value and it can involve financial or non-financial advantages or benefits.

The Standard provides guidance on what is meant by bribery to help users to understand the intention and scope of the Standard.

Bribery: Rose by any other name…
What does ISO 37001 require?

A series of measures and controls to help prevent, detect, and respond bribery, among them:

- An anti-bribery policy, procedures, and controls
- Top management leadership, commitment and responsibility
- Oversight Governing body
- Anti-bribery training
- Bribery risk assessments
- Due diligence on projects and business associates
- Reporting, monitoring, investigation and review
- Corrective action and continual improvement

Implementing ISO 37001 ABMS

- Help organization implement an ABMS or enhance the current measures and controls.

- Implementing a series of measures such as adopting an anti-bribery policy, appointing someone to oversee compliance, vetting and training employees, undertaking risk assessments on projects and business associates, implementing financial & commercial controls, and instituting reporting and investigation procedures.
Implementing ISO 37001 ABMS

• Requires leadership and input from top management, and the policy and programme must be communicated to all staff and external parties such as contractors, suppliers and joint-venture partners.

• Reduce the risk of bribery occurring and can demonstrate to your stakeholders that you have put in place internationally recognized good-practice anti-bribery controls. It can also provide evidence in the event of a criminal investigation that you have taken reasonable steps or adequate procedures to prevent bribery.

How will ISO 37001 benefits an organization?

By providing:

• Minimum requirements and supporting guidance for implementing or benchmarking an anti-bribery management system

• Assurance to management, investors, employees, customers, and other stakeholders that an organization is taking steps to prevent bribery risk

• Evidence that an organization has taken reasonable steps to prevent bribery
Can my organization be ISO 37001 certified?

ISO 37001 is being developed as a requirements with guidance for use (Type A), making it certifiable and will be an excellent tool for companies of all sizes including small ones with limited resources. It will assist companies in the design, implementation and benchmarking of their anti-bribery compliance procedures.

ISO/IEC 17021-9

ISO/IEC TS Conformity Assessment – Requirements for bodies providing audit and certification of management systems – Part 9: Competence requirements for auditing and certification of anti-bribery management systems (ABMS).

Oct 15, 2016
ISO 37001 Certification

3rd party certification bodies can certify an organization’s compliance with ISO 37001 standard in the same way they do for other ISO standards (ISO 9001, ISO 14001, etc).

While it cannot guarantee that there will be no bribery in relation to your organization, certification or compliance with this ISO 37001 standard can help you implement robust and proportionate measures that can substantially reduce the risk of bribery and address bribery where it does occur.

ISO 37001 Certification

ISO 37001 certification demonstrates to customers, stakeholders, business associates, regulatory authorities, personnel, and the public that your organization is committed to ethical business practices.

In a time of enormous media scrutiny of business ethics, certification also provides a substantial competitive advantage.
Eni S.p.A., an Italian multinational oil and gas company, headquartered in Rome, Italy.

First to be certified to ISO 37001:2016 by RINA Services (REGISTRO ITALIANO NAVALE) on January 25, 2017.

Robert Bosch – June 10, 2017

Bosch, the global supplier of technology and services, is the first company in the UAE to be certified to the ISO 37001:2016 - Anti-bribery Management Systems standard, by TASNEEF-RINA Business Assurance L.L.C. The certificate presented to the General Manager and Vice President of Robert Bosch Middle East, Volker Bischoff, and Bosch Middle East Compliance Manager, Sarfraz Ahmed Khan, in the presence of H.E Sultan Bin Saeed Al Mansoori, the Minister of Economy of the UAE.
Alstom – June 27, 2017

Alstom, based in France and present in over 60 countries and employs 32,800 people. Audited in March and May 2017 at seven sites in Europe.

"We are very proud to be among the first companies in the world to receive this certification. It demonstrates our strong commitment to ethics and validates the considerable efforts made internally to increase communication and awareness of our ethical procedures and values, implemented by our Ethics and Compliance Department,"

Henri Poupart-Lafarge, Chief Executive Officer
June 27, 2017

ISO 37001:2016 Certified by Rina Italy

ENI SpA
ENEL SpA
Salini Impregilo SpA
Construtora Queiroz Galvao S/A
Consorzio Integra Società Cooperativa
Monitor segurancapatrimonial LTDA
Robert Bosch Middle East FZE
Two US giant corporations are gearing up to seek ISO 37001:2016 certification.

Neill Stansbury, Chair of ISO/PC 278, said, “ISO 37001 will help an organization comply with international anti-bribery good practice and legal requirements. It will also reassure the organization’s owners, management, employees and business associates that the organization is following ethical business practices and reducing risks of financial loss and prosecution. It will therefore, ultimately, provide a competitive advantage to organizations.”
Way Forward

ISO 37001 to be adopted into MS standard and can be used as management tool to address corporate liability provision to be incorporated into the revised MACC Act.

Moving forward, Neill Stansbury says one of the key indicators of the ISO 37001’s impact will be the degree to which governments adopt it. “It will be a big breakthrough if public sector procurement agencies require the standard to be a pre-qualification requirement for contracts over a certain value.”

Corporate Liability Provision (Bill)

Proposed Corporate Liability Provision (Bill) is tailored after Section 7 of the UK Bribery Act 2010

Failure of Commercial Organisations to Prevent Bribery
Section 7 UK Bribery Act

(1) A relevant commercial organisation (“C”) is guilty of an offence under this section if a person (“A”) associated with C bribes another person intending - (a) to obtain or retain business for C, or (b) to obtain or retain an advantage in the conduct of business for C.

(2) But it is a defence for C to prove that C had in place adequate procedures designed to prevent persons associated with C from undertaking such conduct.

Corporate Criminal Liability

Corporate criminal liability is the liability imposed upon a corporation for any criminal act done by any natural person.

Liability is imposed so as to regulate the acts of a corporation.

The principle of corporate criminal liability is based on the doctrine of respondent superior which is also commonly known as the theory of vicarious liability, where the master is made liable for the acts of his servant.
Corporate Criminal Liability

Corporations or most other legal entities may be criminally liable for the crimes of their employees and agents.

Any corporation can be made liable for act of its agent or servant if s/he:

1. commits a crime;
2. acts within the scope of employment;
3. with the intent to benefit the corporation.

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Corporate Criminal Liability

<table>
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<tr>
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</table>
“Adequate Procedures”

A defence to a prosecution available to an organization is one of having “adequate procedures” in place to prevent bribery. Such procedures refer to having an effective anti-bribery & corruption compliance program in place.

“(6)...commercial organisations should adopt a risk-based approach to managing bribery risks. Procedures should be proportionate to the risks faced by an organisation. No policies or procedures are capable of detecting and preventing all bribery. A risk-based approach will, however, serve to focus the effort where it is needed and will have most impact. A risk-based approach recognises that the bribery threat to organisations varies across jurisdictions, business sectors, business partners and transactions.”
“Adequate Procedures”

This ISO 37001 gives more clarity to the Bribery Act’s ‘adequate procedures’ defence.

Obtaining certification will not make a company immune to prosecution. However, it will make prosecution much less likely in the first place, and it can certainly demonstrate to outsiders that adequate procedures are in place.

“Adequate Procedures”

For example, the U.S Attorneys’ Manual (https://www.justice.gov/usam/usam-9-28000-principles-federal-prosecution-business-organizations) lists the prior existence of an effective compliance program as a factor to be considered when determining whether to charge a business organization, and the U.S. Sentencing Guidelines (http://www.ussc.gov/guidelines/2015-guidelines-manual/2015-chapter-8) list it as a mitigating factor to be considered at sentencing.

Although the DOJ and SEC have not issued any official statements on ISO 37001, various officials speaking in their private capacities have expressed support for the standard and what it seeks to achieve.

At the ACI FCPA conference November 2016, Andrew Weissmann, Chief of the DOJ’s Fraud Section, noted that the US government would certainly factor in ISO 37001 certification in its investigations, including efforts by companies to remediate their program by implementing ISO 37001.
“Adequate Procedures”

While, US federal prosecutors will certainly continue to execute independent discretion, an organization may be able to support compliance to an ISO 37001 certification as evidence that it made every effort to implement an effective anti-bribery and corruption (ABC) program, and therefore deserves lenient treatment.

Similarly, the US authorities may start to point to the absence of ISO 37001 certification as a basis for denying leniency.

Can it be done?

With many of the critical elements of an anti-bribery compliance program out there for companies to decide, oftentimes, even the most sophisticated compliance professionals find themselves struggling to determine how much, how deep and how far-reaching is enough when it comes to mitigating and meeting anti-bribery compliance regulatory expectations.

Now, ISO 37001 ABMS represents a step forward, and could provide the impetus that companies need to establish or revisit their ABC program.
Can it be done?

Each company undertakes its own risk assessment, writes its own code of conduct and designs its corruption prevention policies hoping they will be appropriate, adapted to risk and respect the various national legislations applicable to their operations.

ISO 37001 will be there to help Compliance Officers build, improve and evaluate their anti-corruption compliance systems while ensuring their efforts receive international recognition.

This ISO standard could produce a domino effect in the matter of integrity in business. Imagine that companies certified ISO 37001 require that their partners, intermediaries and supply chain be certified. It could lead to widespread, global transparency in business.
Supply Chain Game-changer

ABMS and its compliance program greatly reduces the risk to your organization of suffering the high costs, penalties and reputational damage associated with bribery.

ISO 37001, game-changer, is expected to be implemented by public sector, that will, in turn, require that external providers and companies wanting to do business with the government departments and agencies should also be certified to the same ISO 37001 standard, too.

Questions & Answers
ISO 37001:2016 AMBS
INTRODUCTION COURSE

Management System Standard High Level Structure

1. Scope

2. Normative References

3. Terms and Definitions

HLS and ISO 9001:2015 structure
ABMS Structure

1 Scope
2 Normative References
3 Terms and Definitions
4 Context of the Organization
  4.1 Understanding the Organization and its Context
  4.2 Understanding Needs and Expectations of Stakeholders
  4.3 Determining the Scope of Anti-bribery Management System
  4.4 Anti-bribery Management System and its Processes
  4.5 Bribery Risk Assessment
5 Leadership
  5.1 Leadership and Commitment
     5.1.1 Governing Body
     5.1.2 Top Management
  5.2 Anti-bribery Policy
  5.3 Organizational Roles, Responsibilities and Authorities
     5.3.1 Roles and Responsibilities
     5.3.2 Anti-bribery Compliance Function
     5.3.3 Delegated Decision-making

6 Planning for the QMS
  6.1 Actions to Address Risks and Opportunities
  6.2 Anti-bribery Objectives and Planning to Achieve Them

7 Support
  7.1 Resources
  7.2 Competence
     7.2.1 General
     7.2.2 Employment Process
  7.3 Awareness and Training
  7.4 Communication
  7.5 Documented Information
     7.5.1 General
     7.5.2 Creating and Updating
     7.5.3 Control of Documented Information
ABMS Structure

8 Operation
8.1 Operational Planning and Control
8.2 Due Diligence
8.3 Financial Control
8.4 Non-financial Controls
8.5 Implementation of Anti-bribery Controls by Controlled Organizations and by Business Associates
8.6 Anti-bribery Commitments
8.7 Gifts, Hospitality, Donations and Similar Benefits
8.8 Managing Inadequacy of Anti-bribery Controls
8.9 Raising Concerns
8.10 Investigating and Dealing with Bribery

ABMS Structure

9 Performance Evaluation
9.1 Monitoring, Measurement, Analysis and Evaluation
9.2 Internal Audit
9.3 Management Review
9.3.1 Top Management Review
9.3.2 Governing Body Review
9.4 Review by Anti-bribery Compliance Function

10 Improvement
10.1 General
10.2 Nonconformity and Corrective Action
10.3 Continual Improvement
### ISO 37001:2016 AMBS
#### INTRODUCTION COURSE

## CIS & ISO 37001 Structure

<table>
<thead>
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<td>7.3 Awareness and Training</td>
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<td>Anti-corruption Prevention Reporting</td>
<td>8.10 Investigating &amp; Dealing with Bribery</td>
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<td>4.5 Bribery Risk Assessment</td>
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<td>11.</td>
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<td>8.5 Implementation of Anti-bribery controls by controlled organizations and by business associates.</td>
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5.1.1.1 Corporate Responsibility
The organization shall define and implement corporate responsibility policies, including at a minimum an anti-bribery policy, an employee code of conduct, and an ethics escalation policy (‘whistle-blowing policy’).

Way Forward
The Market Supervision Commission of the Shenzhen Municipality published an Anti-bribery Management System Shenzhen Standard, SZDB/Z 245-2017 to help companies and other organizations prevent bribery, and detect and deal with any bribery that does occur.

July 01, 2017
ISO/TC 309 – Governance of Organizations

Nov 12 – 17, 2017
Shenzhen, China

TC 309

Standardization in the field of governance relating to aspects of direction, control and accountability of organizations

Ad Hoc Group Strategic Business Plan
Communication & Engagement Advisory Group
Chairman’s Advisory Group
Terminology Co-ordination Group

WG Compliance (ISO 19600)
WG ABMS (ISO 37001)
PWI Ad Hoc Group Governance
PWI Ad Hoc Group Whistleblowing

Lastly but hardly the least...

Thank you!

Dr. Kheng Min LOI