

ISO 37001:2016 AMBS INTRODUCTION COURSE



Introduction to ISO 37001:2016 - ABMS

Presenter : Dr KM Loi
ISO/PC 278 Vice Chair
ISO 37001 Expert



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K M Loi

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).



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K M Loi

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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K M Loi

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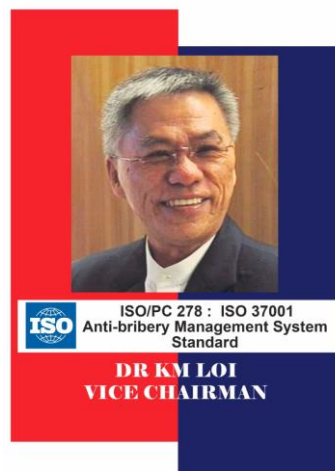
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LinkedIn : Dr KM Loi



ISO
ISO/PC 278 : ISO 37001
Anti-bribery Management System
Standard

DR KM LOI
VICE CHAIRMAN

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International Organization for Standardization

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

Established on Feb. 23, 1947 -
Geneva, Switzerland.



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

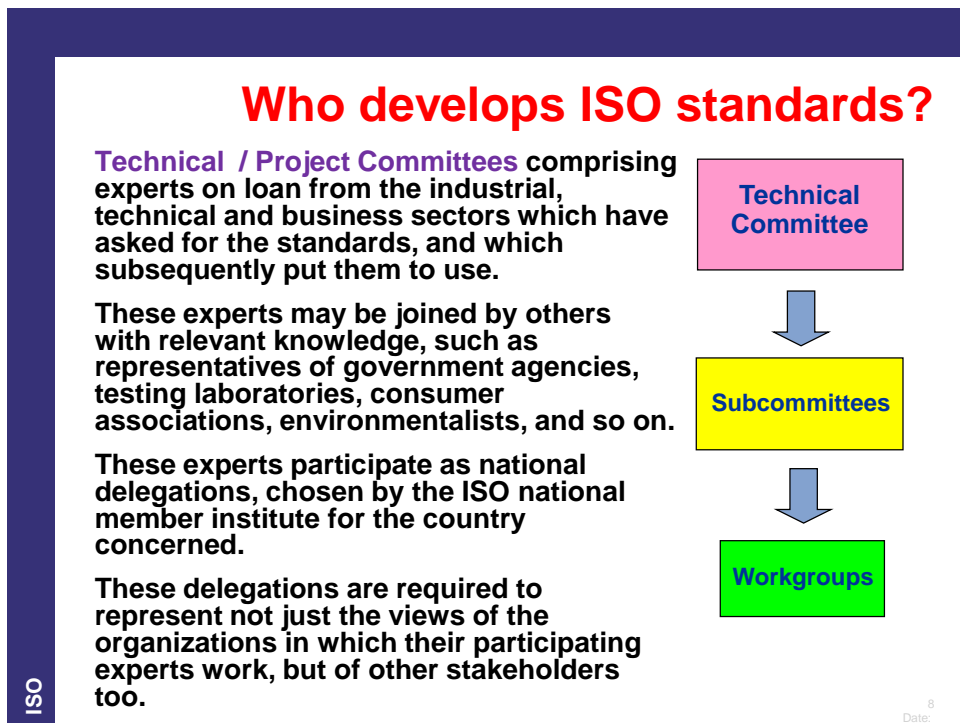
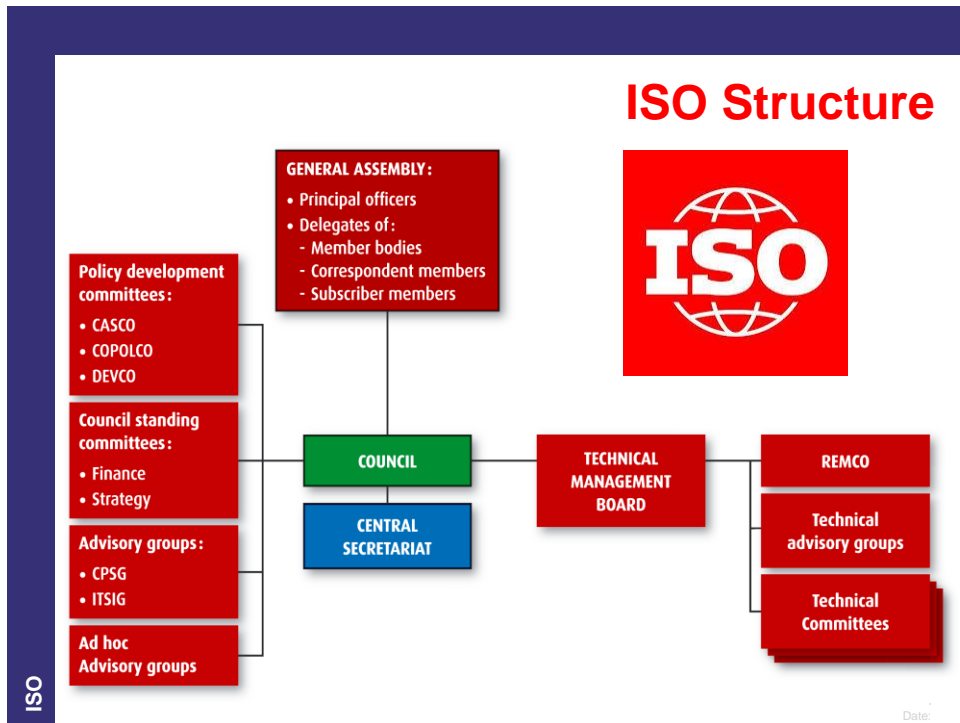


*At August 201

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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**.



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Recommended Timeframe

Project stage	Milestones	Sub-stage	Project time
Preparatory stage	Registration of approved new work item (NWI)	20.00	0
Committee stage	Registration of Committee Draft (CD)	30.00	12
Enquiry stage	Registration of draft International Standard (DIS)	40.00	18
Approval stage	Registration of final draft International Standard (FDIS)	50.00	30
Publication stage	Publication of International Standard (IS)	60.60	36

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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).

International Standard

Technical Specification

Technical Report

Publicly Available
Specification

International Workshop
Agreement

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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



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Management System Control

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

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



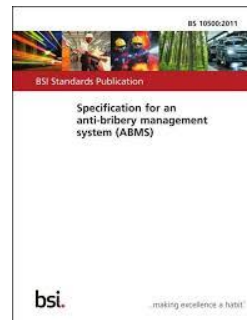
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BS 10500

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.



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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



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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



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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.

- **Liaison organisations (8):**

ASIS, European Construction Industry Federation (FIEC), Independent International Organisation for Certification (IIOC), International Federation of Consulting Engineers (FIDIC), IQNet, OECD, Transparency International, World Federation of Engineering Organisations (WFEO).

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ISO 37001:2016 – ISO/PC 278

ISO 37001:2016

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:



Approach

- 85 experts working towards this International Standard

Publication

- **October 2016**

- New Work Item Proposal (NWIP) : Nov 2012 – Feb 2013

- Preliminary Meeting ISO/PC 278 : 27 Experts met in London from 24 – 27 June 2013.

- 1st Plenary Meeting ISO/PC 278 : 35 Experts met in Madrid from 25 – 27 March 2014.

- 2nd Plenary Meeting ISO/PC 278 : 65 Experts met in Miami from 16 – 19 Sept 2014.

- 3rd Plenary Meeting ISO/PC 278 : 65 Experts met in Paris from 23 – 27 March 2015

- 4th Plenary Meeting ISO/PC 278 : 65 Experts met in Kuala Lumpur from 28 Sept – 02 Oct 2015.

- 5th Plenary Meeting ISO/PC 278 : 65 Experts met in Mexico City from 30 May – June 03, 2016.

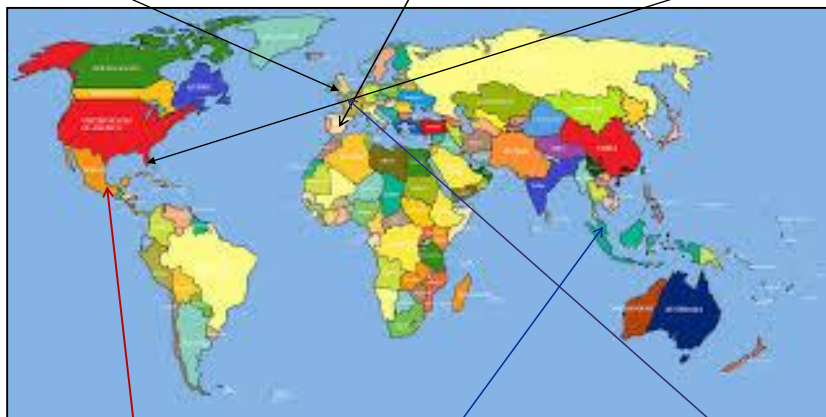
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ISO 37001:2016 Development Process

0. London, UK
24 – 27 June 2013.

1. Madrid Spain
25 – 27 March 2014

2. Miami, USA
16 – 19 Sept 2014.



5. Mexico City Mexico
30 May – 03 June, 2016

4. Kuala Lumpur Malaysia
28 Sept – 02 Oct 2015

3. Paris, France
23 – 27 March 2015

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5th Plenary Meeting of ISO/PC 278



**Mexico City, Mexico
30 May – 03 June, 2016**

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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.

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YES	YES	NO	ABSTAIN
Australia	Mexico	Egypt	Austria
Brazil	Nigeria	France	Croatia
Canada	Norway	Morocco	Czech Republic
Colombia	Pakistan		Lebanon
Denmark	Saudi Arabia		
Ecuador	Serbia		
Germany	Singapore		
Guatemala	Spain	DID NOT CAST	COMMENT
India	Sweden	Cameroon	Argentina
Iraq	Switzerland	China	Transparency International
Israel	Tunisia		
Kenya	United Kingdom		
Malaysia	United States		
Mauritius	Zambia		

90%
(+)ve
VOTE



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ISO 37001:2016

ISO 37001:2016



ISO 37001:2016 was published
and released on October 14, 2016
– 47th World Standards Day 2016

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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-recognised minimum set of measures for an organisation to have in place to **prevent, detect and response to bribery.**

ISO 37001: Anti-Bribery
Management System Standard

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ISO 37001:2016

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.



Date:

ISO 37001:2016

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)



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ISO 37001:2016

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.



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ISO 37001:2016

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...

Football Money Kickback Makan Suap
Pengajian
Kowtean Grease Malang Apples
Washington Apples Under Table
Duit Kopi Pempek Tea Money

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

Anti-Bribery and Anti-Corruption



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ISO 37001:2016

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.



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ISO 37001:2016

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.

ISO 37001:2016

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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

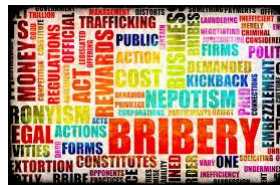


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ISO 37001:2016

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.

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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.**



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ISO 37001 Certification

EVOLUZIONE..... SHEBBAR.COM/FILE/EG



1952 SHEBBAR.COM/EG 1970 SHEBBAR.COM/EG 1998 SHEBBAR.COM/EG 2009

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.

ISO 37001:2016

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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.

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**ISO 37001:2016 AMBS
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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

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ISO 37001:2016 Certified by Rina Italy



**ENI SpA
ENEL SpA
Salini Impregilo SpA
Construtora Queiroz Galvao S/A
Consorzio Integra Società Cooperativa
Monitore seguranca Patrimonial LTDA
Robert Bosch Middle East FZE**

ISO 37001:2016

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ISO 37001 Certification



Two US giant corporations are gearing up to seek ISO 37001:2016 certification.



ISO 37001:2016

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Anti-bribery Good Practice

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.”



Anti-bribery management systems

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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."



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ISO 37001:2016

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



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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.

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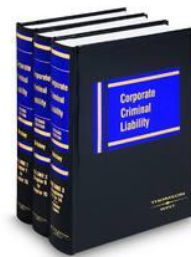
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Corporate Criminal Liability

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**.



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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.

Corporate Criminal Liability

No:	COUNTRY	YEAR
1.	France	1994
2.	Belgium	1999
3.	Italy	2001
4.	Poland	2003
5.	Romania	2006
6.	Luxembourg	2010
7.	Spain	2010
8.	Czech Republic	2012
9.	Slovakia	2016

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“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.

Bribery Act



“(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.”

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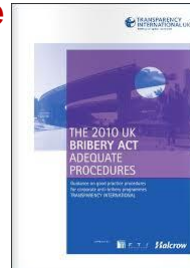
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“Adequate Procedures”

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.**



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“Adequate Procedures”

Some components of ISO 37001 standard mirror the steps set forth in FCPA Resource Guide

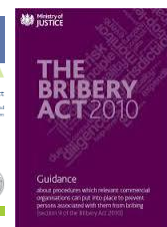
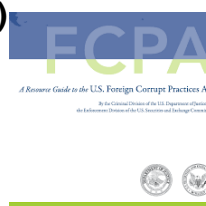
(<https://www.justice.gov/iso/opa/resources/29520121114101438198031.pdf>) issued by the U.S.

Department of Justice and the Securities and Exchange Commission and the UK Bribery Act

Guidance on Section 9 about adequate procedures

(<https://www.justice.gov.uk/downloads/legislation/brbery-act-2010-guidance.pdf>)

document issued by the UK Ministry of Justice.



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“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.



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“Adequate Procedures”

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.**

ISO 37001:2016

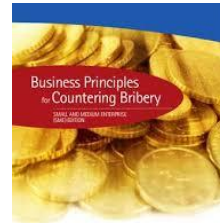
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“Adequate Procedures”

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.



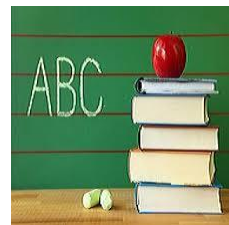
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ISO 37001:2016

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.



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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.**

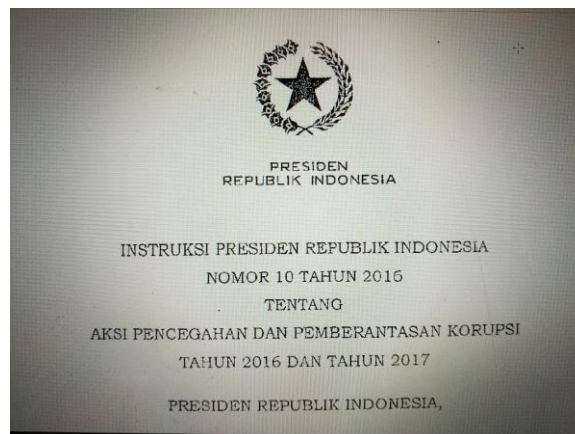


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Aksi Pencegahan Dan Pemberantasan Korupsi Tahun 2016 dan Tahun 2017



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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.

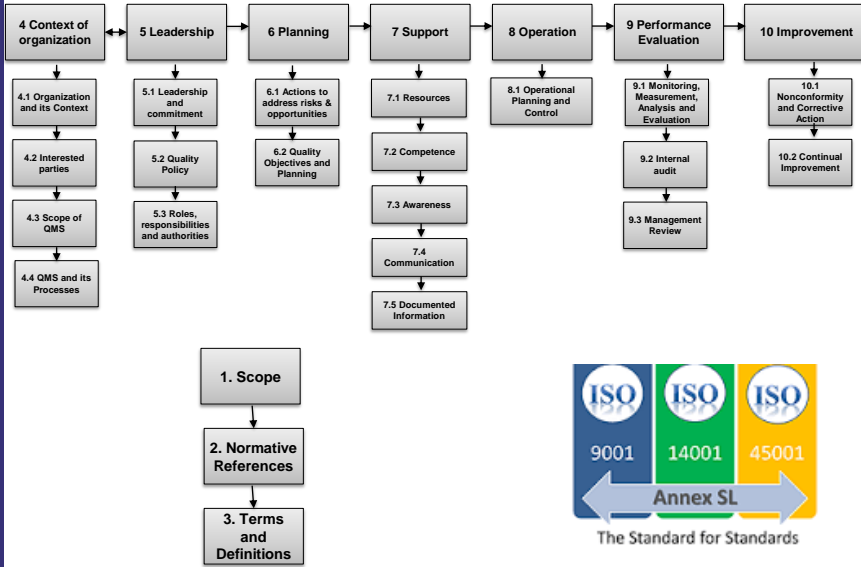
ISO 37001, **game-changer**, is expected to be implemented by public sector, that will, in turn, require that **external providers and companies** wanting to do business with the government departments and agencies should also be certified to the same ISO 37001 standard, too.

Questions & Answers



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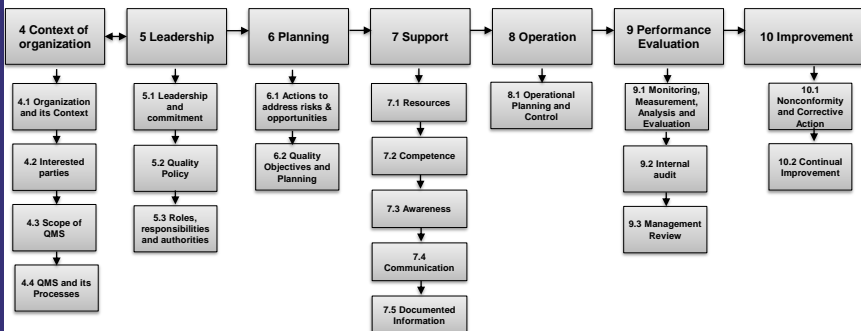
Management System Standard High Level Structure



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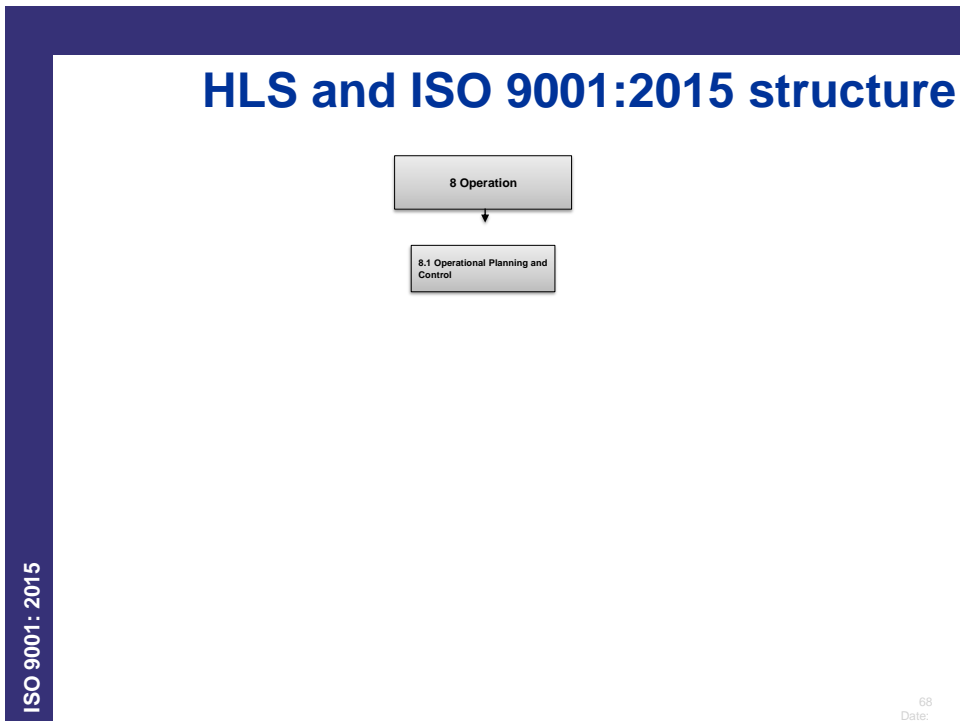
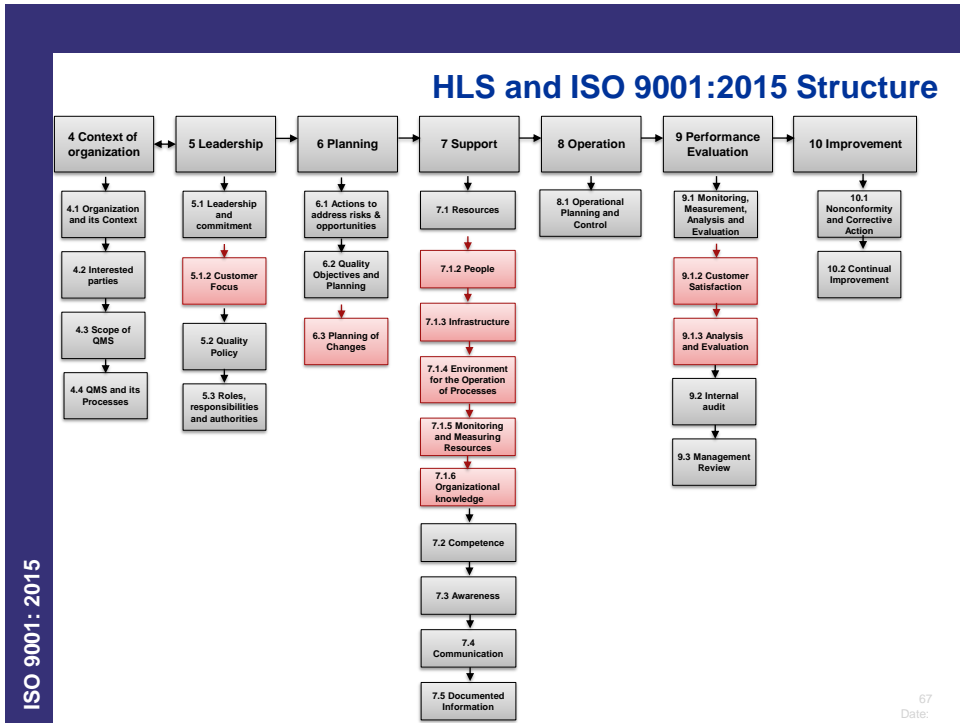
HLS and ISO 9001:2015 structure



ISO 9001: 2015

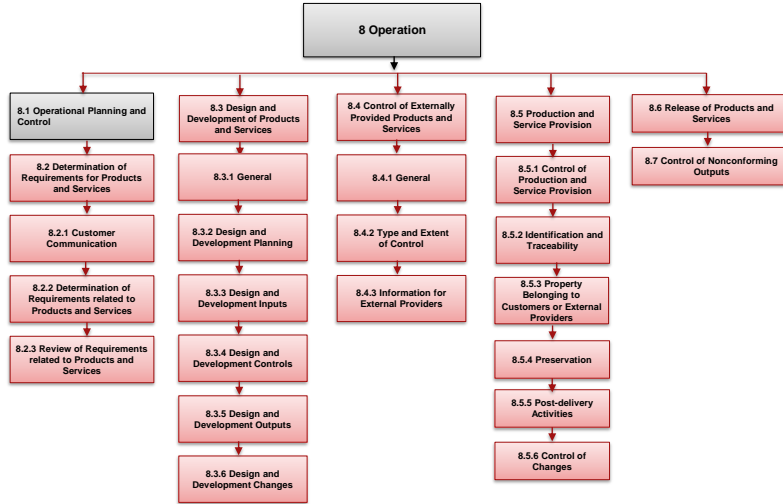
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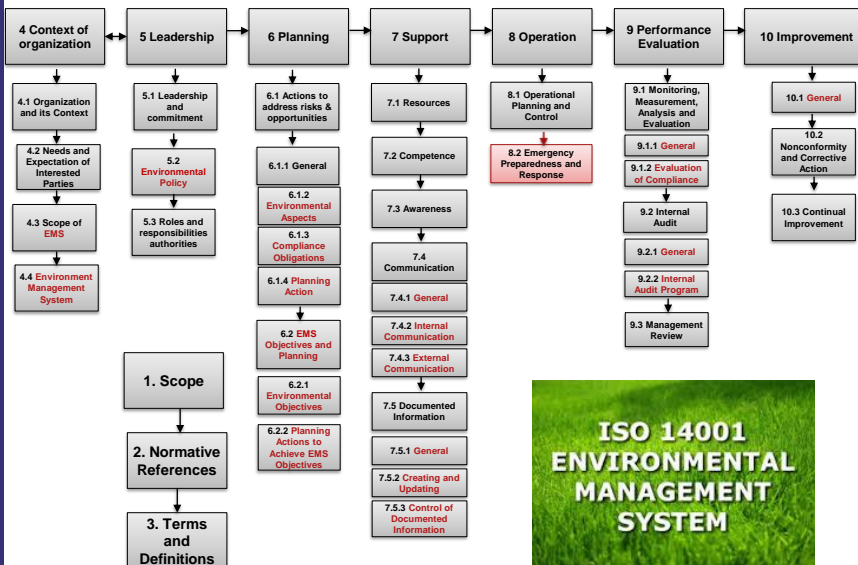
HLS and ISO 9001:2015 Structure



ISO 9001: 2015

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HLS and ISO 14001:2016 Structure

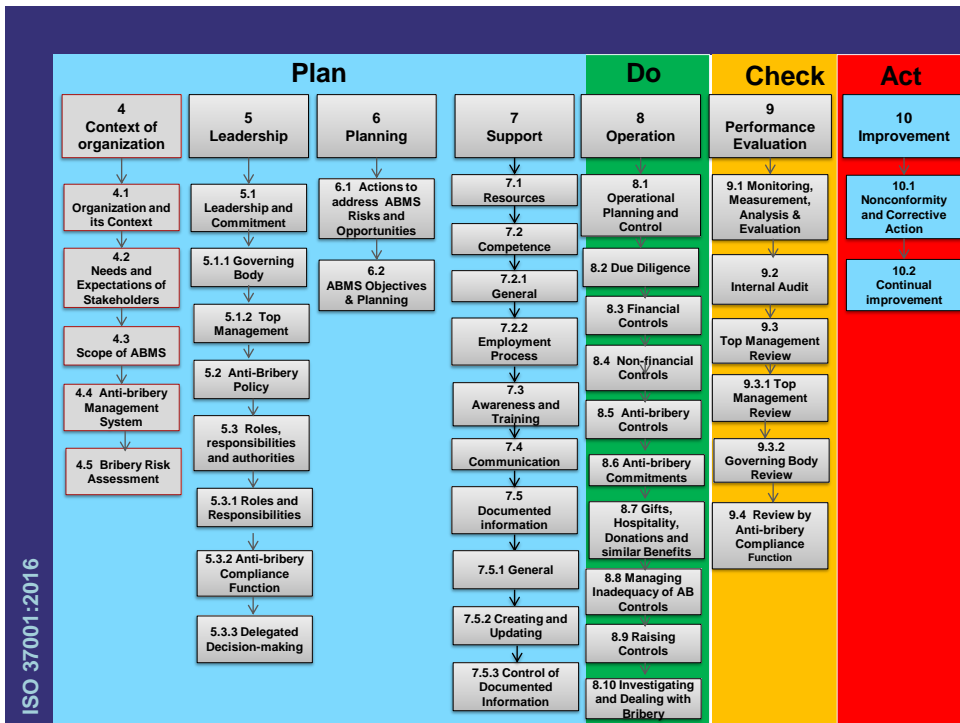
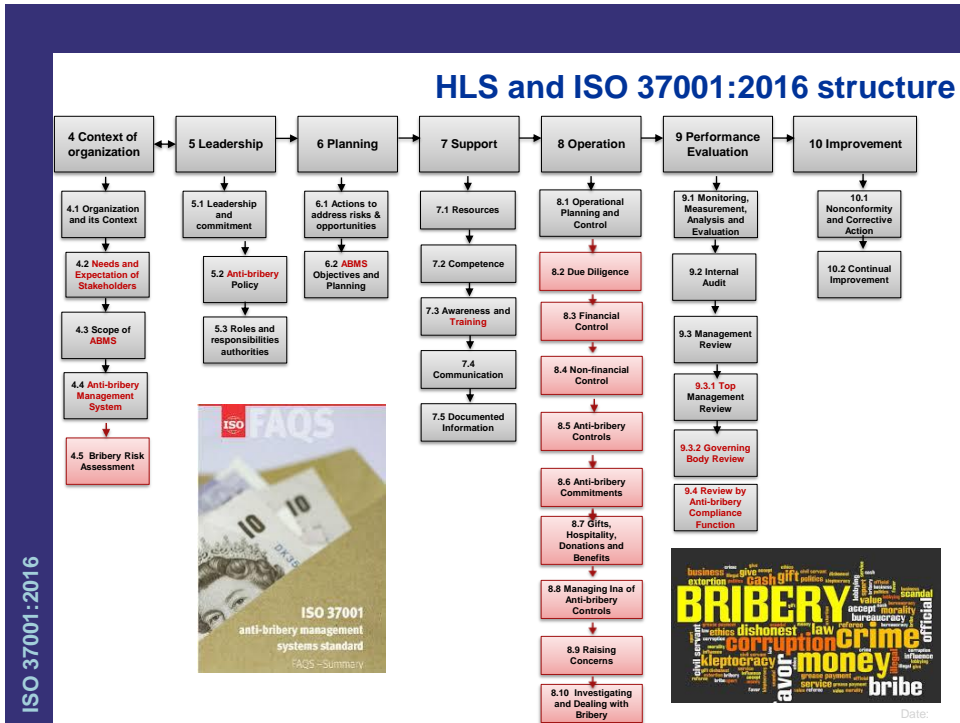


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ABMS Structure

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- 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**



ABMS Structure

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- 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

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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



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ABMS Structure

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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



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CIS & ISO 37001 Structure

No:	Corporate Integrity System	ISO 37001:2016
1.	Leadership	5.1 Leadership & Commitment
2.	Code of Ethics & Anti-bribery Policy	5.2 Anti-bribery Policy
3.	Referral Policy / Gift & Hospitality Policy	8.7 Gift, Hospitality, Donations and similar Benefits
4.	Whistleblowing Policy	- 8.7 -
5.	Conflict of Interest Deterrence	- 8.7 -
6.	Corporate Social Responsibility	- 8.7 -

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CIS & ISO 37001 Structure

No:	Corporate Integrity System	ISO 37001:2016
7.	Compliance Programme	8.3 Financial & 8.4 Non-financial Controls
8.	Training on Ethics, Education & communication	7.3 Awareness and Training
9.	Anti-corruption Prevention Reporting	8.10 Investigating & Dealing with Bribery
10.	Corruption Risk Management	4.5 Bribery Risk Assessment
11.	Integrity Pacts	8.5 Implementation of Anti-bribery controls by controlled organizations and by business associates.

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AUTOMOTIVE QMS IATF 16949:2016



1st OCTOBER 2016

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”).

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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



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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



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Lastly but hardly the least...



Dr. Kheng Min LOI

ISO

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