

Code	PM04
Edition	1 ST
Edition Date	01.09.2025
Application Date	01.09.2025

1. Scope

This policy defines the main changes and facilitates the understanding of the requirements for the transition to the implementation of the new edition of the standard ISO 37001:2025 “Anti-bribery management systems — Requirements with guidance for use”.

The new standard cancels and replaces ISO 37001:2016, including its Amendment Amd1:2024.

This policy has been prepared in accordance with the conditions established by the International Accreditation Forum (IAF) based on the mandatory document *IAF MD 30:2025 Transition Requirements for ISO 37001:2025*.

2. Introduction

The revised standard ISO 37001:2025 specifies requirements and provides guidance for establishing, implementing, maintaining, reviewing and improving an anti-bribery management system. The anti-bribery management system can be stand-alone or integrated into an overall management system. Compliance with its requirements ensures that organizations implement reasonable and proportionate measures designed to prevent, detect and respond to bribery.

3. Policy

3.1 Summary of Main Changes

The main changes introduced by ISO 37001:2025 include, but are not limited to, the following:

- Addition of clauses addressing climate change considerations: Emphasis on the importance of climate-related issues and the need to consider them, when relevant (§4.1, §4.2).
- Strengthened requirements for compliance culture: Enhanced requirements for developing, maintaining and promoting an anti-bribery culture at all levels of the organization (§5.1.3).
- Addressing conflicts of interest: Introduction of a clear definition and specific requirements for the identification and management of conflicts of interest (§3.28, §5.3.3).
- Clarification of the anti-bribery compliance function: Improved definition and responsibilities of the anti-bribery compliance function (§3.8, §5.3.2).
- Terminology harmonization: Alignment of terminology with other ISO management system standards where appropriate and reasonable.

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- Adoption of the latest Harmonized Structure (HS): Implementation of the most recent harmonized structure for ISO management system standards.
- Enhanced guidance: Update of Annex A with more comprehensive guidance for the application of the requirements.

3.2 Implementation of Required Actions

Specifically for the implementation of this policy, effective from 1 September 2025, the certification body has:

- Identified the changes between the new and previous editions through a gap analysis.
- Ensured that relevant personnel (auditors, technical reviewers, decision-makers) affected by the changes are competent to apply the revised edition.
- Updated its own management system and documented information (e.g. procedures, forms, certification regulations, bribery risk assessment methodologies) to ensure full conformity with the revised standard.
- Trained relevant personnel so that they fully understand the new requirements and key changes, particularly regarding anti-bribery culture and conflict-of-interest management.
- Developed procedures for assessing the competence and independence of the anti-bribery compliance function of certified organizations.

3.3 Transition Timeline & Client Notification

The transition timeline is determined by the official requirements of ESYD (National Accreditation Body of Greece) and IAF:

- Final transition deadline: 28 February 2027.
- Mandatory application for initial assessments: From 28 February 2026, all initial certification audits and accreditation extensions shall be conducted against the new edition of the standard.

Certified clients will primarily be affected in the following areas:

- Requirements for developing an anti-bribery culture and the involvement of all levels of top management.
- Management of conflicts of interest and the development of related procedures.
- Consideration of climate-related issues as potential factors affecting the anti-bribery management system.

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- Definition and operation of the anti-bribery compliance function with enhanced competence and independence requirements.
- Strengthened requirements for communication and training concerning the anti-bribery policy.

The transition of existing certified clients will take place during their scheduled surveillance or recertification audits within the defined timeline, ensuring completion before the final transition deadline.

This policy will be published on the certification body's website in the information material section for the timely notification of existing and prospective clients starting from 1 October 2025.

4. References

- IAF MD 30:2025 *Transition Requirements for ISO 37001:2025*
- ISO 37001:2025 *Anti-bribery management systems — Requirements with guidance for use*
- ISO 37001:2016 & Amd1:2024 (Withdrawn)
- ISO/IEC 17021-1:2015 *Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements*
- ISO 37002:2021 *Whistleblowing management systems — Guidelines*
- ISO 37301:2021 *Compliance management systems — Requirements with guidance for use*