

# ISO 37001

## ANTI-BRIBERY MANAGEMENT SYSTEMS

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Roundtable for Companies  
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# On the road to a change of paradigm

- **The managerial challenge:**

- **Creating**

- **A global compliance culture**
    - **Based on integrity**
    - **Capable of being communicated**

- **The legal challenge**

- **The responsibility of legal person**

- **Effective ethics and compliance program**

- **reduces culpability score for corporations (FCPA)**
    - **Defense against failure to prevent bribery (UKBA)**
    - **Failure to take all the reasonable organisational measures to prevent bribery is condition of punishability (Swiss Criminal Code)**



Prepared by the ICC Commission on  
**Corporate Responsibility and Anti-corruption**

## ICC Rules on Combating Corruption

Policy statement



Prepared by the ICC Commission on  
**Corporate Responsibility and Anti-corruption**

## ICC Guidelines on Agents, Intermediaries and Other Third Parties



International Chamber of Commerce  
*The world business organization*

## ICC Guidelines on Whistleblowing

*Prepared by the ICC Commission on Anti-Corruption*

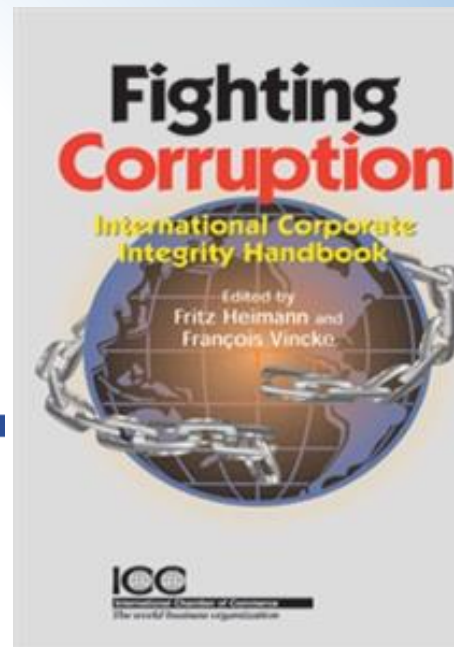


## ICC Guidelines on Gifts & Hospitality



## Anti-corruption Clause

JPM – 6.10.2016



# Who is ISO?

- **International Organisation for Standardisation**
- **Non-governmental, international**
- **Based in Geneva**
- **163 national standards bodies**
  - **Participate and vote in technical and policy meetings**
  - **Adopt standards nationally**
  - **Jordan Standards and Metrology Organisation JSMO**





Over 20'000 standards including:

9001 Quality systems

19600 Compliance

26000 Social responsibility

31000 Risk Management

3166 Country codes

4217 Currencies

37001 Anti-bribery management systems



# Project Committee 278 – PC 278

- **141 experts from 50 countries and 30 liaison representatives**
- **6 meetings**
  - **Preliminary meeting London – June 2013**
  - **Madrid – March 2014**
  - **Miami – September 2014**
  - **Paris – March 2015**
  - **Kuala – Lumpur – September 2015**
  - **Mexico – June 2016**

# Scope of the standard

- **Bribery in private, public and not-for-profit sectors**
- **Active and passive bribery**
  - **By or of the organization, its personnel or business associates**
- **Direct and indirect bribery**
- **Applicable to all organizations or parts of an organization regardless of type, size and nature of activity**

# Main elements of the anti-bribery management system

- **Leadership**
  - Tone from the top
  - Policy
  - Roles and responsibilities
  - Anti-bribery compliance function
  - Delegated decision-making
- **Support**
  - Resources
  - Competence
  - Communication
- **Operation**
  - Due diligence
  - Controls
  - Business associates
  - Gifts, hospitality, donations
  - Raising concerns
  - Investigations
- **Performance evaluation**
- **Improvement**



# What is new with ISO 37001?

- **Builds on existing best practices**
- **Applicable globally**
- **More detailed than other tools**
- **Includes a comprehensive guidance document**
- **Certifiable**

# Benefits of ISO 37001

- **Full guidance on anti-bribery management**
- **Flexible, risk based**
- **Assurance to management, investors business associates, personnel on bribery prevention**
- **Evidence of reasonable measures to prevent bribery**

# Thank you!

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