



[Company]

[Company Address]

ISO 37001:2016

MANAGEMENT SYSTEM MANUAL

(MANUAL)

Document No.: ABMS-M-01 Revision No. 00

Name	Name	Name
Designation	Designation	Designation
Sign	Sign	Sign
Date	Date	Date
Prepared By	Reviewed By	Approved By



MANUAL	Document No: ABMS-M-01
Issued: August 10th, 2021	Revision No: 00

2.1 APPLICABILITY

The Anti-Bribery Management System (ABMS) is applicable to [Company], in all aspects of service provision. ABMS covers all of our activities, functions, and processes related to the provision of services. During client interactions, all employees and representatives of [Company] must adhere to the principles outlined in the ABMS. This means that any form of bribery, including the offering or acceptance of gifts, hospitality, or inducements, is strictly prohibited.

We conduct due diligence on all suppliers and contractors to assess potential bribery risks. By doing so, we ensure that we only engage with reputable partners who align with our commitment to anti-bribery practices.

Every contract or agreement that [Company] enters into with clients will include specific clauses regarding anti-bribery compliance. These clauses underscore our zero-tolerance approach towards corruption and bribery.

All financial transactions related to service provision are subject to scrutiny to prevent any illicit funds from influencing our business decisions.

To ensure the effective implementation of the ABMS, roles and responsibilities are clearly defined. Top management provides leadership and support for the ABMS, while employees are responsible for implementing anti-bribery controls and reporting any potential breaches.

2.1.1 SCOPE OF ABMS

The ABMS covers all service provision activities within [Company]. This includes but is not limited to:

- Planning, executing, and monitoring service delivery processes.
- Interactions with clients, suppliers, and any third parties involved in service provision.
- Financial transactions related to service delivery.

2.1.2 OPERATIONAL AREA & SITE(S)

Write here the location on which this manual and ABMS is applicable.

2.1.3 PERMISSIBLE EXCLUSION (S)

Write here if any of part of organization is excluded.



[Company]

[Company Address]

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ANTI-BRIBERY RISK ASSESSMENT

(PROCEDURE)

Document No.: ABMS-P-01 Revision No. 00

Name	Name	Name
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1. PURPOSE

The purpose of this procedure is to establish, implement, and maintain a systematic approach for identifying, analyzing, and assessing bribery risks as part of [Company]'s Anti-Bribery Management System (ABMS). Through regular bribery risk assessments and diligent evaluation of controls, [Company] aims to proactively manage bribery risks, uphold the highest ethical standards, and foster a culture of integrity and transparency in all its activities.

2. SCOPE

This procedure is applicable to all activities [Company] performs, all facilities it has and products which [Company] provides under scope of ABMS defined in clause 2 of ABMS manual.

3. TERMS AND DEFINITIONS

Bribery Risk: The risk of bribery occurring within [Company]'s operations, interactions, or transactions.

All applicable as defined in clause 3 of manual.

4. PROCEDURE

4.1 IDENTIFICATION OF BRIBERY RISKS

4.1.1 RISK IDENTIFICATION PROCESS

The ABMS Team Leader, in coordination with relevant department heads and key stakeholders, shall undertake regular bribery risk assessments. This process includes the following steps:

- a) **Reviewing External and Internal Issues:** The ABMS Team Leader shall conduct a thorough review of external and internal issues identified in Clause 4.1 of the ABMS manual. These issues may include, but are not limited to, the following factors:
 - Regulatory requirements and changes in legislation related to bribery and corruption.
 - Economic and geopolitical influences that may impact [Company]'s operations.
 - The nature and complexity of business transactions, including interactions with public officials and government entities.
 - The locations and jurisdictions where [Company] operates, considering varying levels of bribery risks in different regions.
 - The industry-specific risks and challenges related to bribery and corruption.



COMPANY NAME

ADDRESS

Anti-Briber Risk Register

Document No: ABMS-F-30 Revision No: 00 Issued: August 10th, 2021



Due Diligence Form	Document No: ABMS-F-18
Issued: August 10th, 2021	Revision No: 00

Candidate Name		Status	Existing/ New Hiring
Designation		Department	

Sr. No.	Verifications	Process Employed	Results
1.	Background Check		
2.	Education and Credentials		
3.	Work History		
4.	References		
5.	Criminal History		
6.	Financial History		
7.	Conflicts of Interest		
8.	Code of Conduct and Policies		
9.	Non-Disclosure Agreement		
10.	Compliance and Training		

Additional Remarks (if any):

Team Verified Information			
Sr. No.	Name	Role	Sign



Gifts, hospitality, donations and similar benefits Log	Document No: ABMS-F-28
Issued: August 10th, 2021	Revision No: 00

SR	Date of Transaction	Recipient's Name and Position	Giver's Name and Position	Nature of Transaction	Value or Estimated Value	Reason for Transaction	Relationship to Business	Approval (if applicable)	Compliance with Policies	Remarks

Reviewed and Approved by		Date	
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Anti-Bribery Policy

Doc. No: ABMS-PO-01
Rev: 00

At [Company], we are dedicated to maintaining the highest ethical standards and conducting our business with integrity. Our Anti-Bribery Policy outlines our firm commitment to combat bribery in all its forms and across all levels of our organization. We strictly prohibit any involvement in bribery, both giving and receiving, and expect full compliance with all anti-bribery laws that are applicable to our operations.

Our policy is designed to be appropriate to the purpose and objectives of our organization. It establishes a robust framework for setting, reviewing, and achieving anti-bribery objectives, ensuring that we meet the requirements of our Anti-Bribery Management System and continually improve our practices.

We encourage all employees and stakeholders to raise concerns in good faith or based on a reasonable belief, and we assure them that they can do so confidentially and without fear of reprisal. We believe that open communication and reporting play a crucial role in preventing and detecting bribery.

To ensure the effectiveness of our Anti-Bribery Management System, we empower the anti-bribery compliance function with the necessary authority and independence. This ensures that our efforts to combat bribery are proactive, consistent, and aligned with our organizational values.

Non-compliance with our Anti-Bribery Policy can lead to serious consequences, as we are committed to upholding the integrity of our organization and safeguarding the interests of our stakeholders. We are dedicated to continually improving our anti-bribery practices and upholding our commitment to ethical business conduct.

[Signature]

[Name of Governing Body Head]

[Position/Title]

[Date]



Whistleblowing Reports Log	Document No: ABMS-F-34
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Sr. No.	Whistleblower	Related to	Classification	Action Taken By	Responsible Person	Status

Reviewed By		Date:
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