



**GABRIEL REGISTRAR'S TRANSITION GUIDANCE
ARRANGEMENT FOR
ISO 37001:2025 ANTI-BRIBERY MANAGEMENT SYSTEMS (ABMS)**

Introduction

The ISO 37001:2025 Anti-bribery management systems standard details the requirements for an anti-bribery management system which is designed to detect, discourage and prevent bribery.

The standard lists measures that organisations should have in place to deal with bribery, and this includes establishing an anti-bribery function, roles, responsibilities and authorities, an anti-bribery culture, anti-bribery risk assessments, training, awareness and operational controls.

The standard stipulates that there should be adequate resources in place to establish an anti-bribery management system which is effective, supported by internal audits and management reviews. The establishment of the anti-bribery function is also intended to review the organisations behavior and overall bribery risk, ensuring it conforms to the requirements of the standard, reporting to any applicable governing bodies and providing advice and guidance.

The new edition of the international standard ISO 37001:2025, covering Anti-Bribery Management Systems (ABMS), was published by the International Organization for Standardization (ISO) in February 2025, marking the first revision of the standard in nine years.

The revision strengthens the framework for preventing, detecting, and responding to bribery, incorporates more contemporary governance elements, and improves alignment with other compliance management system standards.

Official Transition Period as per IAF MD 30:2025

Under the decision of the International Accreditation Forum (IAF), as set out in IAF MD 30:2025, a two year transition period applies for migration from ISO 37001:2016 to ISO 37001:2025.

What are the changes in the updated version of the standard?

Key Changes in ISO 37001:2025

The new edition introduces a series of modifications that enhance the practicality and effectiveness of an ABMS. Major changes include:

a) Strengthening anti-bribery culture

- Integration of a broader “culture of ethics and integrity.”
- Expanded responsibilities for top management and emphasis on active support for the system.



b) Upgraded “Anti-Bribery Function”

- The term “anti-bribery compliance function” is replaced by “anti-bribery function,” with clearer responsibilities, independence, and access to top management.

c) Stricter management of conflicts of interest

- New requirements to identify, control, and monitor conflicts of interest at all levels.

d) Enhanced third-party due diligence

- A strengthened due-diligence model for suppliers, consultants, partners, and intermediaries.
- Ongoing oversight of third-party relationships.

e) Alignment with modern ESG assessment frameworks

- Integration of elements linking bribery risks with environmental and social dimensions where these affect the organization.

Summary of Key Changes in this revision:

- Subclauses were added on climate change and stressing the importance of the compliance culture.
- Conflicts of interest were addressed.
- The concept of the anti-bribery function was clarified.
- The wording was harmonized with other standards where appropriate and reasonable.
- The latest harmonized structure was introduced.

Transition Period

Organizations already certified to ISO 37001:2016 will typically be granted a 3-year transition period ISO 37001:2025 is officially published. During this time, they will need to:

- Review and update documentation and procedures.
- Conduct a gap analysis.
- Train key personnel on new and revised requirements.
- Update anti-bribery risk assessments and control frameworks.



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Gabriel Registrar (GRCIS) hereby inform all its clients to make transitions plans for their organization's transition to fully occur prior to the transition timeline.

Transition Start Date	1st September 2026
Actual Transition End Date	1st September 2027

Gabriel Registrar – Transition Cut off Dates for clients

Gabriel Registrar start date for conducting either Initial or Surveillance & / or Recertification audits for ISO 37001:2025 transition with 1 minimal audit manday Gap assessment.	1st September 2026
Gabriel Registrar Cutoff Date for completion of transition audit for ISO 37001:2016 to ISO 37001:2025	1st September 2027
Certification for ISO 37001:2016 will no longer be valid after this date	27 February 2028

It is to be noted that for organizations that have already implemented standards based on HLS, Also, with 2016 version, organizations are also afforded more flexibility in terms of documentation requirements.

Time Duration for a Transition Audit

All ABMS certified organizations must have a transition audit to confirm the implementation of the revised standard. The transition audit may be conducted in conjunction with an existing audit or may be a stand-alone audit.

If the transition audit is conducted in conjunction with an existing surveillance (i.e. transition surveillance) or recertification audit (i.e. transition re-assessment), additional time may be added to the audit duration in order to cover the new requirements/concepts introduced by ISO 37001:2025.

If a stand-alone audit is carried out for the transition audit, the duration be calculated on an individual organization basis.

Note: Specific audit durations for transition will depend on the actual situation of the organization including the organization's size and the complexity of the ABMS.

Transition Timeline

There will be a transition period of 3 years commencing from 28-02-2025 to 27-02-2028.

GRCIS shall not accept new applications for certification to ISO 37001:2025 after 1st September 2027. GRCIS will commence assessments to be expected ISO 37001:2025 from 1st September 2026, onward for all new applications based on UAF AB Accreditation prior approval.



Key transition dates:

Until 31/08/2026

Organizations may undergo initial audits against ISO 37001:2016. After this date (from 31/08/2026).

End of transition period: 1st September 2027

All certifications based on ISO 37001:2016 will be suspended or withdrawn at the end of the transition period. No audits or recertifications to the 2016 edition will be permitted thereafter.

Certificates issued during the transition period

Any ISO 37001:2016 certificate issued or renewed during the transition must carry an expiry date no later than 1st September 2027, regardless of the normal three-year validity.

Transition during routine surveillance

Organizations already certified to ISO 37001:2016 may transition to the new edition during annual surveillance audits, following prior coordination with GRCIS certification body.

Transition and update your ABMS Certification

Any types of audits, the given non-conformances identified during the transition audit will require a corrective action to be submitted and approved by Gabriel Registrar. An updated ISO 37001:2025 certification will be issued based on the given corrective action approval.

Updated ISO 37001:2025 accredited certification will be issued, and the validity will be as follows:

Transition during surveillance:

The organization's existing '**Valid Until Date**' will be maintained. Means the existing certification cycle to be continue with same expiration of the certification.

Transition during re-certification:

Transition re-assessment – A new '**Valid Until Date**' will be issued for the renewed 3 year period.

Stand-alone transition:

The organization's existing '**Valid Until Date / Expiry Date of the certificate**' will be maintained.

Note: Guideline of Gabriel Registrar transition policy has been adhered with as per any IAF MD document and circulars of ABs EIAC & UAF Transition policy requirements.



Frequently Asked Questions (FAQ)

1) We would like to train our staff prior to working on the transition of certification.

To ensure you protect your business and get awareness for the transition standard requirements of certification processes, it is important to understand the changes and their impact on your organization operational control as soon as possible.

Incorporated changes in ISO 37001:2025 awareness course and other related courses. We recommend you contact Gabriel Registrar Academy to schedule a training session.

2) We are interested in transition audit; can we combine with our next surveillance audits?

Yes, certainly; however it is essential to comprehend the modifications and potential advantages for your business in order to ensure that you are adequately prepared for a seamless standard transition requirements and effectively safeguarding your business in the interim.

3) Are there other ways to complete the Transition Audit?

You could perform the transition audit during the routine surveillance audit, during the recertification audit or a special audit. Please refer to the transition timeline.

4) I am not ready to transition yet. What should I do?

It is crucial to comprehend the extent of the modifications and the potential benefits to your company promptly in order to safeguard your business and facilitate a seamless standard transition requirement. This will enable you to strategically prioritize the implementation of the changes based on risk, schedule the transition at an optimal time for your organization, and allow for ample preparation.

5) We need to identify what the gaps are before moving forward to the transition audit.

Yes, we can conduct a gap assessment. We can identify the gaps in between the existing standard version with the current version. We allow you to fill those gaps yourselves and maintain in the management system requirements to achieve the transition certification.

6) Which ISO Standards can ISO 37001 be easily integrated with?

ISO 37001 can be seamlessly integrated with multiple ISO management system standards, including:

ISO 9001 (Quality Management System) – Ensures that anti-bribery controls align with overall business quality standards.

ISO 37301 (Compliance Management System) – Helps in embedding anti-bribery measures into broader corporate compliance frameworks.



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ISO 27001 (Information Security Management System) – Strengthens anti-bribery policies related to cyber security and data protection.

ISO 14001 (Environmental Management System) – Aligns with sustainability and climate-related bribery risk management introduced in ISO 37001:2025 and etc any HLS requirement MS system certification.