Procedure OP.QP01.01ABMS

Rules for Management Systems Certification – Addendum ISO 37001

Issue Status Sheet

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Version No.	Amendment	Date	Approved By (Document Owner)
4	General review of the document; changed company name from EuCI European Certification Institute Ltd to Amtivo Southern Europe Ltd; alignment to Amtivo corporate template	09.09.2026	DS MG

Sommario

1. PURPOSE AND SCOPE

This Regulation defines the general conditions for the certification of Anti-Bribery Management Systems (ABMS).
It constitutes an integration to Regulation OP.QP01.01 "Rules for Management Systems Certification" of ASE, whose requirements therefore remain fully applicable to the execution of the ABMS certification process.
The provisions contained in this Regulation, similarly to those of OP.QP01.01, are of a contractual nature both for ASE and for the Organization requesting certification of its Anti-Bribery Management System, implemented in accordance with ISO 37001.
This Regulation is applied uniformly and impartially to all Organizations that request certification of their Anti-Bribery Management System from ASE.

2. DEFINITIONS

- **ABMS**: Anti-Bribery Management System – ISO 37001.
- **Bribery**: offering, promising, giving, accepting or soliciting 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.
- **Anti-bribery function**: the person(s) with responsibility and authority for the operation of the anti-bribery management system.
- **Conflict of interest**: situation where business, financial, family, political or personal interests could interfere with the judgment of individuals.

3. REFERENCE DOCUMENTS

- ISO 37001: Anti-bribery management systems – Requirements with guidance for use.
- ISO/IEC TS 17021–9: 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.
- OP.QP01.01 Rules for Management Systems Certification.
- fo.QP03.01 Documents of external origin for ABMS.

4. PROCEDURE FOR ABMS CERTIFICATION

Certifications according to ISO 37001 follow the same rules prescribed in the Rules for Management Systems Certification OP.QP01.01, with the additions indicated in the following paragraphs.

4.1 Information that the Customer must provide before starting the certification process

An essential element in the certification process is the information that the applicant Organization provides to ASE. To start the certification process, the following information must be collected:

- Whether the Organization applying for certification has, in the last 5 years, been involved in a legal investigation concerning corruption/bribery.
- Whether the Organization belongs to one of the following categories:
  - Public Administrations
  - Public finance bodies
  - Companies wholly or partly subject to public control
- % of financing (public contributions, funds or financing received) from the Public Administration or public bodies.
- % of revenue received from public companies, bodies or international institutions; any type of payment, including payment deriving from public contracts, exceeding 30% of their revenue.
- Whether members of the decision-making and/or control functions are appointed by the Public Administration.
- The CPI (Corruption Perceptions Index) of the country where the Organization is based (in the case of companies based in more than one country falling within the scope of the certificate, the index of the country with the lowest score applies).

4.2 Determination of ABMS equivalent staff

For the purposes of the certification process, the employees involved in activities and processes considered sensitive are computed.

Examples of sensitive processes:

- finance and control
- sales, agents and sales network
- procurement, purchasing, gifts and donations management, cash administration and management
- institutional figures and corporate bodies, management offices and board of directors
- internal audit, control and testing activities
- licence, tender and authorization management
- human resources management (including management, selection, hiring and career advancement)
- relations with institutional authorities and control bodies
- patronage and sponsorship management
- litigation and complaints management
- IT services and security management.

Based on the analysis carried out by the Organization, the number of employees involved in processes with a low risk of corruption can be reduced to the square root of the total (e.g. production operators, drivers, etc.).

Where sensitive processes/activities of the Organization are carried out in outsourcing (e.g. consortia), the calculation of employees will also take these subjects into account.

During the stage 1 audit, or in any case during the first useful audit, ASE will re-examine the reasonableness of this adjustment based on the corruption risks identified, and will verify the consistency of the number of employees communicated by the Organization when defining the contract, reporting the results in the audit report.

4.3 Audit duration

Audit duration is determined following the rules of Procedure QP02 – DETERMINATION OF THE DURATION OF MANAGEMENT SYSTEMS AUDITS for QMS, based on the Organization's classification as a company with a "low, medium or high" corruption risk, according to the following criteria:

High-risk organizations

a) If the Organization applying for certification has, in the last 5 years, been involved in a legal investigation concerning corruption/bribery.

b) Public Administrations.

c) Public finance bodies.

d) Companies wholly or partly subject to public control.

e) Associations, foundations and private-law entities with majority financing by the Public Administration, or bodies in which all members of the administrative and policy-making bodies are appointed by the Public Administration.

f) Administrative Authorities.

g) Third-sector entities (e.g. voluntary organizations, entities for cooperative activities) and company cooperatives.

h) Category/umbrella associations (including political parties and trade unions) at national representation level.

i) Professional associations and national boards.

j) Companies located in countries with a CPI score of less than or equal to 30.

k) The classification of perceived corruption is made by Transparency International. In the case of companies based in more than one country falling within the scope of the certificate, the index of the country with the lowest score applies.

l) Non-SME organizations in the following sectors:

- health
- construction
- banking and insurance
- utilities (gas, electricity, water)

Medium-risk organizations

Organizations that do not present a high-risk level and that meet at least one of the following conditions:

- receive public contributions, funds or financing – national and international – exceeding 30% of their revenue;
- receive, from public companies, bodies or international institutions, any type of payment, including payment deriving from public contracts, exceeding 30% of their revenue;
- are located in countries with a CPI score between 31 and 59;
- are trading, intermediation or commercial companies not classifiable by revenue as SMEs.

High-risk organizations certified for at least three years under EA/IAF MLA certification for ISO 37001 are classified as medium risk. This condition does not apply if the Organization applying for certification has been involved, in the previous five years, in legal proceedings concerning corruption/bribery.

Low-risk organizations

Organizations not falling within the two categories above. Increases and reductions are applied as provided for the calculation of the duration relating to the QMS.

5. MULTISITE CERTIFICATIONS

The requirements already set out in Regulation OP.QP01.01 apply, with the clarification that sites where processes/activities at risk of corruption are carried out, and those deriving from the risk analysis prepared by the Organization, cannot be excluded from the sampling base.

The certification is issued to a single legal entity and includes all sites, branches, secondary offices, activities and processes actually carried out by the Organization. No exclusions of sites/processes/functions carried out in the same country are permitted.

It is however possible to limit the application to specific countries, but the scope must always include sensitive processes and activities carried out abroad when carried out under the responsibility and direct control of the Organization (e.g. representative offices, secondary offices, agents or mediators). This aspect must be clearly stated in the certificate. In the case of groups of companies, when sensitive activities/processes are carried out by other group companies (parent company and/or subsidiaries), even abroad, clause 8.5 of ISO 37001 applies.

6. OBLIGATIONS OF THE PARTIES

6.1 Obligations of the Client

- The certified Organization, or the Organization with an ongoing certification process, must promptly inform ASE when it becomes involved in any critical situation that could compromise the certification guarantee of the system (e.g. scandal, crisis, or involvement in judicial proceedings for corruption or similar).
- The Organization must promptly notify ASE of any event relating to corruption phenomena that may have involved one or more of its Human Resources, together with the consequent actions taken to contain the effects of such event, the root-cause analysis, and the related corrective actions.

6.2 Obligations of ASE

Where ASE becomes aware, directly from the Organization or from other sources, that the Organization is implicated with responsibility in a scandal or in judicial proceedings for corruption, ASE has the duty (in accordance with the requirements ASE must comply with as a certification body) to promptly conduct specific assessments/investigations that may lead to the suspension/withdrawal of the certificate.

In such cases, ASE will carry out the necessary investigations and assessments and take the appropriate measures and actions; for example, it may inform the market that the Organization is "under observation" (without prejudice to legal obligations and those of regulated markets, e.g. the stock exchange), decide to close the case, decide on sanctions, strengthen audit activities, etc., defined according to the adequacy of the response and the strategies adopted by the Client.

7. LIABILITY LIMITS

The certification of an ABMS attests to the application of the requirements of the reference standard and the relevant regulatory requirements; it is not a guarantee that the Organization, or parts of it, operate according to the principles defined in its ABMS or according to applicable legal requirements.

Audits carried out during the certification cycle are not of an investigatory nature aimed at detecting corruption events but are intended to verify that the Organization has implemented what is prescribed by the reference standards.

8. USE OF CERTIFICATION MARKS

The use of the certification mark and of the certification wording follows the requirements defined in Regulation OP.QP01.01. The certification marks and certification wording relating to ISO 37001 are shown below: