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<i>REL.</i>	<i>CHANGES</i>	<i>DRAWN</i>	<i>CHECKED</i>	<i>APPROVED</i>	<i>DATE</i>
0	Nuova emissione	GL	SQ	FG	06/11/2025

1. PURPOSE AND SCOPE

This operating instruction defines the procedures to be followed for the transition from ISO 37001:2016 to ISO 37001:2025 certification. It also defines the minimum timeframes to be dedicated to on-site activities for surveillance, renewal, or extraordinary audits of anti-bribery management systems (ABMS), which will coincide with the transition to ISO 37001:2025.

For anything not expressly stated in this document, please refer to the requirements set forth in the IAF MD 30:2025 Guideline and the PROC-070 Management System Certification Regulation.

2. REGULATIONS AND REFERENCE DEFINITIONS

The regulations and reference definitions for this procedure are indicated in the standards EN ISO/IEC 17021-1:2015, ISO 37001:2025 Anti-Bribery Management Systems, and IAF Guideline MD 30:2025.

3. VALIDITY OF ISO 37001:2016 CERTIFICATIONS

The ISO 37001:2025 standard was published on February 28, 2027. For the 24 months following the publication date of the ISO 37001:2025 standard, both certifications issued in accordance with ISO 37001:2016 and those issued in accordance with ISO 37001:2025 will be valid.

As of February 28, 2027, certifications issued in accordance with ISO 37001:2016 will lose their validity. All newly issued, renewed, or revised ISO 37001:2016 certifications issued during the transition period will have an expiration date prior to February 27, 2027. Following a successful audit of ISO 37001:2025 compliance, the validity date for continued certification will be restored, meaning the certificate will display the original expiration date three years after issuance.

4. ISO 37001:2025 TRANSITION AUDIT

Within the aforementioned transition period, all certifications issued in accordance with ISO 37001:2016 may be updated and issued in accordance with ISO 37001:2025.

To transition to the ISO 37001:2025 standard, organizations certified according to ISO 37001:2016 must:

- i. Obtain a copy of ISO 37001:2025
- ii. Identify gaps between ISO 37001:2016 and ISO 37001:2025
- iii. Develop an adoption plan
- iv. Ensure all necessary skills and awareness among all stakeholders
- v. Update their ABMS and verify compliance
- vi. Organize the migration with the certification body (CAB).

In conjunction with the audit planning required by the three-year program, the client company (with at least 15 days' notice) may request a transition audit to comply with the new standard.

For scheduled renewal audits of certifications issued in accordance with ISO 37001:2016, the compliance obligation will be effective from August 31, 2026, or 18 months after the publication date of the new standard.

In all other cases, the transition may occur through a special audit or may coincide with one of the scheduled audits for maintaining certification, namely:

- A. The certified company will request a special audit to verify whether its system is aligned with the requirements of ISO 37001:2025. If the management system's level of compliance with all the requirements of ISO 37001:2025 is assessed positively, certification will be issued in accordance with the new standard;

In conjunction with a surveillance/renewal audit, at the client's specific request, the certified company's management system will be assessed for compliance with all requirements of the ISO 37001:2025 standard. If the assessment is successful, certification to the new standard will be issued.

- B. Anccp CA can conduct the transition audit remotely if the objectives of the transition audit are met.

For clients who do not complete the transition by February 27, 2027, the ISO 37001:2016 certificate will become invalid by February 28, 2027.

5. TIMING

The times (expressed in man-days) indicated in contracts for surveillance and renewal activities are a basic reference for planning transition audits; these values may be revised based on the specifications of IAF MD 05 - EMS scheme.

The following criteria also apply to calculating the actual number of personnel:

- It is necessary to consider all employees involved in activities and processes deemed sensitive by the organization, in addition to the processes/functions listed in the certification application information sheet.
- An adjustment by square root may be made for equivalent employees employed in operational production or service provision processes, only if these processes present low corruption risks based on the organization's risk assessment, and in any case always excluding employees involved in the sensitive processes/activities listed in the previous point.

A minimum of 0.5 man-days will be added to the above-mentioned times calculated for surveillance or renewal audits.

Factors that may further increase audit times include:

- a large number of stakeholders who influence the organization's actions and are in turn influenced by them because they have a direct or indirect interest in the organization's results, resulting in increased ABMS complexity or risks;
- a large number of roles and powers appropriate for carrying out the activity, resulting in increased ABMS complexity or risks;
- risks of interference with subcontractors, resulting in increased ABMS complexity or risks;
- the organization has been involved in multiple judicial investigations in the last 5 years relating to
- corruption.

In general, the following criteria apply:

Case A

- The duration of extraordinary audits cannot be less than the time required for a surveillance audit and, in any case, not less than 1 man-day;

Case B

- The expected times for surveillance/renewal audits are increased by a minimum of 0.5 man-days compared to the times calculated based on ISTR-013/4 Definition of Audit Times in Management Systems.

It is clarified that if the calculation of man-days results in a decimal number, the number is rounded to the nearest half-day of work (for example: 5.3 audit days become 5.5 audit days; 5.2 audit days become 5 audit days).

Any variations in the times specified must be justified and approved in advance by ANCCP; the related assessments, data, and any changes are recorded.

The costs to be charged to companies for the aforementioned activities are those already estimated in the contract; additional time will be calculated based on the hours spent and the related expected costs, as will the issuance of the certificate during a non-renewal phase.

The records needed to define audit times are archived by the Project Manager in the Client's technical folder.