

# Compliance Matrix – ISO 37001:2016

ISO 37001:2016 – Anti-bribery Management Systems: Audit Checklist



auditchecklists.org

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Regulation leaves: 76    Clause: 76 / 76    Generated: 2026-06-01

Every leaf of the regulation appears below. Each is mapped to the audit-checklist question(s) that cover it, or marked *informational* where no separate audit question applies (definitions, roll-up parents, scope statements). Question references read Q<n> – open the corresponding article/clause of the checklist and locate the question by its number.

## Clause 4

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
<b>Clause</b> ISO 37001 Cl.4.1	Q1
<b>Clause</b> ISO 37001 Cl.4.2	Q2
<b>Clause</b> ISO 37001 Cl.4.3	Q3
<b>Clause</b> ISO 37001 Cl.4.4	Q4
<b>Clause</b> ISO 37001 Cl.4.5.1	Q5
<b>Clause</b> ISO 37001 Cl.4.5.2	Q6

## Clause 5

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
<b>Clause</b> ISO 37001 Cl.5.1.1(a)	Q1
<b>Clause</b> ISO 37001 Cl.5.1.1(b)	Q2
<b>Clause</b> ISO 37001 Cl.5.1.1(c)	Q3
<b>Clause</b> ISO 37001 Cl.5.1.1(d)	Q4
<b>Clause</b> ISO 37001 Cl.5.1.1(e)	Q5
<b>Clause</b> ISO 37001 Cl.5.1.2(a)	Q6
<b>Clause</b> ISO 37001 Cl.5.1.2(b)	Q7
<b>Clause</b> ISO 37001 Cl.5.1.2(c)	Q8

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
Clause ISO 37001 Cl.5.1.2(d)	Q9
Clause ISO 37001 Cl.5.1.2(e)	Q10
Clause ISO 37001 Cl.5.1.2(f)	Q11
Clause ISO 37001 Cl.5.1.2(g)	Q12
Clause ISO 37001 Cl.5.1.2(h)	Q13
Clause ISO 37001 Cl.5.1.2(i)	Q14
Clause ISO 37001 Cl.5.1.2(j)	Q15
Clause ISO 37001 Cl.5.1.2(k)	Q16
Clause ISO 37001 Cl.5.1.2(l)	Q17
Clause ISO 37001 Cl.5.1.2(m)	Q18
Clause ISO 37001 Cl.5.2(a)	Q19
Clause ISO 37001 Cl.5.2(c)	Q20
Clause ISO 37001 Cl.5.2(d)	Q21
Clause ISO 37001 Cl.5.2(f)	Q22
Clause ISO 37001 Cl.5.2(h)	Q23
Clause ISO 37001 Cl.5.2(i)	Q24
Clause ISO 37001 Cl.5.2	Q25
Clause ISO 37001 Cl.5.3.1	Q26
Clause ISO 37001 Cl.5.3.2(a)	Q27
Clause ISO 37001 Cl.5.3.2(d)	Q28
Clause ISO 37001 Cl.5.3.2	Q29

## Clause 6

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
Clause ISO 37001 Cl.6.1	Q1
Clause ISO 37001 Cl.6.2	Q2 Q3

## Clause 7

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
Clause ISO 37001 Cl.7.1	Q1
Clause ISO 37001 Cl.7.2.1	Q2
Clause ISO 37001 Cl.7.2.2.1(a)	Q3
Clause ISO 37001 Cl.7.2.2.1(b)	Q4
Clause ISO 37001 Cl.7.2.2.1(c)	Q5
Clause ISO 37001 Cl.7.2.2.1(d)	Q6
Clause ISO 37001 Cl.7.2.2.2	Q7
Clause ISO 37001 Cl.7.3	Q8 Q9
Clause ISO 37001 Cl.7.4	Q10
Clause ISO 37001 Cl.7.5	Q11

## Clause 8

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
Clause ISO 37001 Cl.8.1	Q1
Clause ISO 37001 Cl.8.2	Q2
Clause ISO 37001 Cl.8.3	Q3
Clause ISO 37001 Cl.8.4	Q4
Clause ISO 37001 Cl.8.5.1	Q5
Clause ISO 37001 Cl.8.5.2	Q6
Clause ISO 37001 Cl.8.6	Q7
Clause ISO 37001 Cl.8.7	Q8
Clause ISO 37001 Cl.8.8	Q9
Clause ISO 37001 Cl.8.9(a)	Q10
Clause ISO 37001 Cl.8.9(b)	Q11
Clause ISO 37001 Cl.8.9(c)	Q12
Clause ISO 37001 Cl.8.9(d)	Q13
Clause ISO 37001 Cl.8.9(e)	Q14

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
Clause ISO 37001 Cl.8.9	Q15
Clause ISO 37001 Cl.8.10(a)	Q16
Clause ISO 37001 Cl.8.10(b)	Q17
Clause ISO 37001 Cl.8.10(c)	Q18
Clause ISO 37001 Cl.8.10(e)	Q19
Clause ISO 37001 Cl.8.10(f)	Q20
Clause ISO 37001 Cl.8.10	Q21

## Clause 9

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
Clause ISO 37001 Cl.9.1	Q1
Clause ISO 37001 Cl.9.2.1	Q2
Clause ISO 37001 Cl.9.2.2	Q3
Clause ISO 37001 Cl.9.3.1	Q4
Clause ISO 37001 Cl.9.3.2	Q5
Clause ISO 37001 Cl.9.4	Q6

## Clause 10

REGULATION LEAF	AUDIT-CHECKLIST QUESTION(S)
Clause ISO 37001 Cl.10.1	Q1 Q2
Clause ISO 37001 Cl.10.2	Q3