

# ISO 37001:2016 (whole Part)

## Audit Checklist

79 audit questions across 7 sections.

### HOW TO USE THIS CHECKLIST

Each question has three boxes the auditor fills in during the audit:

1. **Compliance** — the binary headline: Compliant / Non-compliant.
2. **Classification** — where the gap is, four-state grid: Documented / Implemented matrix.
3. **Finding level** — severity: Maj / Min / Obs (Major nonconformity / Minor nonconformity / Observation).

Severity is the auditor's call on the day, against the real finding — no severity is pre-suggested per question.



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## Context of the organization

**Q1** CLAUSE

ISO 37001 Cl.4.1

Has the organisation determined the external and internal issues relevant to its purpose that affect its ability to achieve the intended outcome of its anti-bribery management system – including, among the factors, the size/structure of the organisation, the locations and sectors it operates in, the nature/scale/complexity of its activities, its business model, the entities over which it has control, its business associates, and the nature/extent of its interactions with public officials?

**SOURCE VERBATIM**

Cite ISO 37001:2016 Clause 4.1.

**COMPLIANCE**

Compliant  Non-compliant

**CLASSIFICATION (FOUR-STATE)**

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

**FINDING LEVEL**

Maj  Min  Obs  
 Maj = Major nonconformity · Min = Minor nonconformity · Obs = Observation

**SUGGESTED EVIDENCE TO REQUEST**

- Context analysis covering internal/external issues and the bribery-relevant factors (locations, sectors, business associates, public-official interactions)

**MANAGEMENT SYSTEM REFERENCE:**

**FINDINGS / NOTES:**

Has the organisation determined the interested parties relevant to the anti-bribery management system and their relevant requirements?

SOURCE VERBATIM

Cite ISO 37001:2016 Clause 4.2.

COMPLIANCE

Compliant  Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

FINDING LEVEL

Maj  Min  Obs  
 Maj = Major nonconformity · Min =  
 Minor nonconformity · Obs =  
 Observation

SUGGESTED EVIDENCE TO REQUEST

- Interested-party register with relevant anti-bribery requirements

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES:

Has the organisation determined the boundaries and applicability of the anti-bribery management system to establish its scope – considering the 4.1 issues, the 4.2 requirements and the results of the bribery risk assessment (4.5) – with the scope available as documented information?

SOURCE VERBATIM

Cite ISO 37001:2016 Clause 4.3.

COMPLIANCE

Compliant  Non-compliant

CLASSIFICATION (FOUR-STATE)

- Documented and Implemented
- Documented Not Implemented
- Not Documented but Implemented
- Not Documented and Not Implemented

FINDING LEVEL

Maj  Min  Obs  
Maj = Major nonconformity · Min = Minor nonconformity · Obs = Observation

SUGGESTED EVIDENCE TO REQUEST

- Documented ABMS scope statement reflecting 4.1/4.2 and the bribery risk assessment

MANAGEMENT SYSTEM REFERENCE:

FINDINGS / NOTES:

[Empty text box for findings and notes]