

国际标准

反贿赂管理体系 要求及使用指南

ISO 37001:2025

第二版 2025-02-28

受版权保护的文件

© 2025 ISO 保留所有权利

ISO 公司拥有 ISO 公司出版物的全部或部分。这些出版物是许可而非出售，受 ISO 最终客户许可协议、相关 ISO 成员机构许可协议或授权第三方经销商的条款和条件约束。

ISO 出版物仅授予使用许可，并非出售。未经国际标准化组织、ISO 成员国机构或授权第三方分销商事先书面许可，不得以任何形式、任何手段（电子、机械方式，包括复印、扫描、录制等）对本文件全文或部分内容进行复制、传播、修改；亦不得将其上传至内部网络、互联网及各类数字平台。

本文件不得向第三方泄露，使用范围严格遵循对应许可约定。凡超出许可范围擅自复制、传播及使用的行为，ISO 将依法追究相关方法律责任。

ISO 版权办公室

地址：CP 401 · Ch. de Blandonnet 8, CH-1214 韦尔尼耶，日内瓦

电话：+41227490111

电子邮箱：copyright@iso.org

官方网站：www.iso.org

本标准于瑞士发布

目录

前 言.....	5
引 言.....	7
1 范围.....	8
2 规范性引用文件.....	8
3 术语和定义.....	8
4 组织所处的环境.....	11
4.1 了解组织及其所处环境.....	12
4.2 理解相关方的需求和期望.....	12
4.3 确定反贿赂管理体系范围.....	12
4.4 反贿赂管理体系总则.....	12
4.5 贿赂风险评估.....	13
5 领导作用.....	13
5.1 领导作用与承诺.....	13
5.1.1 治理机构.....	13
5.1.2 最高管理者.....	13
5.1.3 反贿赂文化.....	14
5.2 反贿赂方针.....	14
5.3 职责、权限.....	14
5.3.1 通用要求.....	14
5.3.2 反贿赂职能.....	15
5.3.3 决策授权.....	15
6 策划.....	15
6.1 应对风险和机遇的措施.....	15
6.2 反贿赂目标及实现目标的策划.....	15
6.3 变更策划.....	16
7 支持.....	16
7.1 资源.....	16
7.2 能力.....	16
7.2.1 通用要求.....	16
7.2.2 人员管理.....	16
7.3 意识.....	17
7.3.1 人员意识.....	17
7.3.2 人员培训.....	17
7.3.3 业务合作方培训.....	17
7.3.4 意识与培训方案.....	18
7.4 沟通.....	18
7.5 成文信息.....	18
7.5.1 通用要求.....	18
7.5.2 成文信息的编制与更新.....	18
7.5.3 成文信息的控制.....	18
8 运行.....	19
8.1 运行策划和控制.....	19

8.2 尽职调查	19
8.3 财务控制	19
8.4 非财务控制	19
8.5 受控组织与业务合作方的管控实施	19
8.6 反贿赂承诺	20
8.7 礼品、招待、捐赠及同类利益往来	20
8.8 管控措施不足的处置	20
8.9 问题上报	20
8.10 贿赂事件的调查与处置	21
9 绩效评价	21
9.1 监视、测量、分析和评价	21
9.2 内部审计	21
9.2.1 通用要求	21
9.2.2 内部审计方案	22
9.2.3 审核流程、控制与体系核查	22
9.2.4 客观性与公正性	22
9.3 管理评审	22
9.3.1 通用要求	22
9.3.2 管理评审输入	22
9.3.3 管理评审输出	23
9.4 反贿赂职能评审	23
10 改进	23
10.1 持续改进	23
10.2 不合格与纠正措施	23
附录 A (资料性)	23
本标准使用指南	23
参考文献	43



**International
Standard**

ISO 37001

**Anti-bribery management
systems — Requirements with
guidance for use**

*Systèmes de management anti-corruption — Exigences et
recommandations de mise en œuvre*

**Second edition
2025-02**



COPYRIGHT PROTECTED DOCUMENT

© ISO 2025

All rights reserved.

ISO publications, in their entirety or in fragments, are owned by ISO. They are licensed, not sold, and are subject to the terms and conditions set forth in the ISO End Customer License Agreement, the License Agreement of the relevant ISO member body, or those of authorized third-party distributors.

Unless otherwise specified or required for its implementation, no part of this ISO publication may be reproduced, distributed, modified, or used in any form or by any means, electronic or mechanical, including photocopying, scanning, recording, or posting on any intranet, internet, or other digital platforms, without the prior written permission of ISO, the relevant ISO member body or an authorized third-party distributor.

This publication shall not be disclosed to third parties, and its use is strictly limited to the license type and purpose specified in the applicable license grant. Unauthorized reproduction, distribution, or use beyond the granted license is prohibited and may result in legal action.

ISO copyright office
CP 401 • Ch. de Blandonnet 8
CH-1214 Vernier, Geneva
Phone: +41 22 749 01 11
Email: copyright@iso.org
Website: www.iso.org

Published in Switzerland

Contents

	Page
Foreword	v
Introduction	viii
1 Scope	1
2 Normative references	1
3 Terms and definitions	1
4 Context of the organization	6
4.1 Understanding the organization and its context.....	6
4.2 Understanding the needs and expectations of interested parties.....	6
4.3 Determining the scope of the anti-bribery management system.....	7
4.4 Anti-bribery management system.....	7
4.5 Bribery risk assessment.....	7
5 Leadership	8
5.1 Leadership and commitment.....	8
5.1.1 Governing body.....	8
5.1.2 Top management.....	8
5.1.3 Anti-bribery culture.....	9
5.2 Anti-bribery policy.....	9
5.3 Roles, responsibilities and authorities.....	10
5.3.1 General.....	10
5.3.2 Anti-bribery function.....	10
5.3.3 Delegated decision-making.....	10
6 Planning	11
6.1 Actions to address risks and opportunities.....	11
6.2 Anti-bribery objectives and planning to achieve them.....	11
6.3 Planning of changes.....	12
7 Support	12
7.1 Resources.....	12
7.2 Competence.....	12
7.2.1 General.....	12
7.2.2 Employment process.....	12
7.3 Awareness.....	13
7.3.1 Awareness of personnel.....	13
7.3.2 Training for personnel.....	13
7.3.3 Training for business associates.....	14
7.3.4 Awareness and training programmes.....	14
7.4 Communication.....	14
7.5 Documented information.....	15
7.5.1 General.....	15
7.5.2 Creating and updating documented information.....	15
7.5.3 Control of documented information.....	15
8 Operation	16
8.1 Operational planning and control.....	16
8.2 Due diligence.....	16
8.3 Financial controls.....	16
8.4 Non-financial controls.....	16
8.5 Implementation of anti-bribery controls by controlled organizations and by business associates.....	17
8.6 Anti-bribery commitments.....	17
8.7 Gifts, hospitality, donations and similar benefits.....	18
8.8 Managing inadequacy of anti-bribery controls.....	18
8.9 Raising concerns.....	18
8.10 Investigating and dealing with bribery.....	18

ISO 37001:2025(en)

9	Performance evaluation	19
9.1	Monitoring, measurement, analysis and evaluation	19
9.2	Internal audit	19
9.2.1	General	19
9.2.2	Internal audit programme	20
9.2.3	Audit procedures, controls and systems	20
9.2.4	Objectivity and impartiality	20
9.3	Management review	20
9.3.1	General	20
9.3.2	Management review inputs	21
9.3.3	Management review results	21
9.4	Review by anti-bribery function	21
10	Improvement	22
10.1	Continual improvement	22
10.2	Nonconformity and corrective action	22
Annex A (informative) Guidance on the use of this document		23
Bibliography		46

注：本文件内容受到版权保护，未经恰当的授权禁止复制。本公司客户及相关单位，如需获取文件完整内容，请联系市场部门获取，电话：010-84724911。