CORE
CONCEPT

Anti-Bribery and Anti-Corruption Compliance Programme: ISO 37001 and Third-Party Due Diligence

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Introduction:

Bribery exposure rarely sits where policies assume. It builds through sales agents paid unexplained commissions, hospitality that shades into inducement, undeclared conflicts of interest on tender panels and small facilitation payments treated as routine. Penalties, debarment and lost contracts follow. This Core Concept course equips managers to run an anti-bribery and anti-corruption compliance programme under ISO 37001:2025, from bribery risk assessment and third-party due diligence to procurement and finance controls, training and board reporting. Participants work on multi-sector cases and leave with an Anti-Bribery Programme Plan.

Course Objectives:

- Identify forms of bribery and corruption, facilitation payments and conflicts of interest in the organisation's own processes and third-party relationships
- Apply the ISO 37001:2025 requirements to structure an anti-bribery management system, policy set and anti-bribery compliance function
- Conduct a bribery risk assessment and set proportionate controls for gifts, hospitality, sponsorships, donations and payments
- Perform risk-based due diligence on agents, intermediaries, suppliers and joint venture partners and embed anti-bribery controls in procurement
- Route bribery concerns and allegations to a proportionate response and track programme effectiveness through training coverage and monitoring indicators
- Produce an Anti-Bribery Programme Plan and board report ready for approval by the governing body

Target Audience:

- Compliance managers responsible for anti-bribery policy, the gifts and hospitality regime and programme monitoring
- Legal managers advising on third-party contracts, anti-bribery clauses and allegation handling
- Procurement and contracts managers accountable for tender integrity and supplier onboarding
- Finance managers who approve payments, expenses, commissions and petty cash
- Internal audit and risk managers providing assurance over bribery risk and anti-bribery controls
- Commercial and business development managers who appoint agents, distributors and intermediaries

Course Outline:

Day 1: Bribery and Corruption Risk Foundations

- Forms of Bribery and Corruption: Active, Passive, Public Official, Private Sector and Kickback Schemes
- Facilitation Payments, Extortion and Duress Payment Scenarios
- Conflict of Interest Typology: Actual, Potential and Perceived Conflicts
- Bribery Red Flag Catalogue Across Sales, Procurement, Licensing and Permits
- Anti-Bribery Programme Maturity Self-Assessment

Day 2: The Anti-Bribery Management System Under ISO 37001:2025

- ISO 37001:2025 Harmonized Structure and Context of the Organisation
- Anti-Bribery Culture and Top Management Leadership Under Clause 5.1.3
- Anti-Bribery Compliance Function: Mandate, Independence and Resourcing
- Anti-Bribery Policy and Procedure Architecture
- Change Planning Under Clause 6.3 and Documented Information Control

Day 3: Bribery Risk Assessment and Core Anti-Bribery Controls

- Bribery Risk Assessment Methodology and Likelihood-Impact Scoring Matrix
- Gifts, Hospitality and Entertainment Thresholds and Pre-Approval Workflow
- Personnel Due Diligence and Conflict of Interest Awareness Under Clause 7.2.2
- Sponsorship, Donation and Community Investment Approval Criteria
- Financial Controls Against Bribery: Payment Approval, Petty Cash and Expense Claim Review

Day 4: Third Parties, Procurement and Allegation Response

- Third-Party Due Diligence Questionnaire and Risk Tiering for Agents and Intermediaries
- Anti-Bribery Contract Clauses, Compliance Certifications and Audit Rights
- Procurement Integrity Controls: Tender Panel Rotation, Bid Rigging Indicators and Split Orders
- Mergers, Acquisitions and Joint Venture Bribery Risk Under Clause 8.4
- Bribery Concern Intake and Allegation Response Protocol

Day 5: Case Work and the Anti-Bribery Programme Plan

- Sales Agent Commission Case Study: From Red Flags to Remediation
- Infrastructure Contractor Case Study: Hospitality and Tender Manipulation
- Anti-Bribery Training Needs Matrix and Monitoring KPI Dashboard Build
- Anti-Bribery Programme Plan Drafting
- Board Anti-Bribery Report Rehearsal and Peer Challenge

Skills You Will Gain:

- Bribery Risk Assessment
- Third-Party Due Diligence
- Gifts and Hospitality Governance
- Anti-Bribery Policy Design
- Procurement Integrity Controls
- Conflict of Interest Management
- Anti-Bribery Monitoring Metrics
- Board Reporting on Bribery Risk

Why Attend This Course:

- Return to work with an Anti-Bribery Programme Plan built around your own bribery risk profile and tested by peers
- Decide with confidence whether a gift, sponsorship, commission or payment request should be approved, conditioned or refused
- Show the board where bribery risk sits in the third-party base and which controls reduce it
- Compare anti-bribery practice with managers from construction, energy, healthcare, public services and trading businesses

Conclusion:

An anti-bribery programme is tested at the point where a payment, a gift or an agent appointment is approved. This course moves from the forms of bribery and corruption and the ISO 37001:2025 management system, through bribery risk assessment and core controls, to third-party due diligence, procurement integrity and allegation response. The final day applies that material to multi-sector cases and produces an Anti-Bribery Programme Plan and board report that participants take back to their governing body.