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MINISTRY OF INVESTMENT, TRADE AND INDUSTRY  
DEPARTMENT OF STANDARDS MALAYSIA

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**The Scheme for the Accreditation of Certification Bodies (The ACB Scheme)**  
**ACB CIRCULAR 1/2025**  
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**TRANSITION FROM ISO 37001:2016 TO ISO 37001:2025 – ANTI-BRIBERY  
MANAGEMENT SYSTEMS – REQUIREMENTS WITH GUIDANCE FOR USE**

## 1 INTRODUCTION

This document provides transition requirements for:

<b>Normative Document:</b>	ISO 37001:2025
<b>Replacing:</b>	ISO 37001:2016
<b>Date of Publication:</b>	28 February 2025
<b>Transition Period</b>	2 years

## 2 OBJECTIVE

This circular aims to inform the Department of Standards Malaysia (JSM) applicant and accredited Certification Bodies (CBs) on the transition process to the revised standard.

### 3 REQUIREMENTS FOR THE TRANSITION TO ISO 37001:2025

#### 3.1 Accredited CBs

3.1.1 The following are the requirements that the CBs shall follow:

Activity	Due Date
<b>For certification standards:</b>	
A. CBs assess based on revised standard beginning	1 August 2025
B. CBs to provide gap analysis to the revised standard which includes: <ul style="list-style-type: none"> <li>i. Communication to clients on transition to the revised standard;</li> <li>ii. Training to key personnel on the revised standard; and</li> <li>iii. Arrangement of the CB to transition clients to the revised standard.</li> </ul>	At least one (1) week prior to assessment.
C. JSM to witness the CB based on the revised standard no later than	1 August 2026
D. CBs to complete transition of all clients by	28 February 2027

#### 3.2 Applicant CBs

3.2.1 The following are the requirements that the CBs shall follow:

Activity	Due Date
A. Applicants that have begun the accreditation process to complete the transition no later than:	1 August 2026
B. New applicants received after the following date to be based on the revised standard	1 August 2025

3.3 When there is an IAF (International Accreditation Forum) Mandatory Document (MD) or Asia Pacific Accreditation Cooperation (APAC) policy published with

regards to this transition, the transition dates in the IAF MD or APAC policy supersede this circular. The other requirements remain the same.

#### **4 IMPLICATIONS**

- 4.1 Failure of the CB to satisfactorily transition within the transition period may result in a finding raised during the assessment.
- 4.2 Failure of the CB to satisfactorily transition after the transition has ended may result in accreditation being suspended or withdrawn.

#### **5 IMPLEMENTATION**

- 5.1 After 28 February 2027, accredited certification to ISO 37001:2016 shall no longer be accepted.

Approved by:

**Director of Accreditation**