



Heads Up

Issue: 548

Date: 2025/08/27

To: ANAB-Accredited and Applicant CABs and MS Accreditation Assessors

From: Natalia Larrimer, Director of Accreditation, Management Systems

Re: ISO 37001:2025 Declaration of Transition Process for Certification Bodies


ISO 37001:2025 - Anti-bribery management systems — Requirements published in February 2025 has replaced the previous version, ISO 37001:2016.

As a result of the revision, ANAB accredited certification bodies (CBs) will be required to complete a transition of accreditation to be able to continue to offer accredited certification for the revised standard. An IAF Mandatory Document has been created defining the transition requirements and will be published soon. If, when released, the IAF requirements contradict the ANAB requirements, the requirements for transition as set out by the IAF in a mandatory document will be followed. ANAB will communicate any changes impacting the transition process immediately.

ANAB will be utilizing the Declaration of Transition process. Each CB accredited by ANAB for ISO 37001 will directly receive the declaration form via email with instructions for submitting the completed form to ANAB. A pdf version of the document is attached for reference. CBs are not able to issue certification to the ISO 37001:2025 version of the standard until the transition of accreditation is complete which includes the ANAB transition decision.

All existing ISO 37001:2016 certifications must be transitioned to the 2025 version of the standard by 28 February 2027, with additional timeframes for initial and recertification activity, as outlined in the declaration Annex A (attached).

Accreditation Rule 41 will be revised to reflect the latest version of ISO 37001 including a detailed transition plan for ANAB accredited Certification Bodies.

Declaration of Transition		 ANAB <small>ANSI National Accreditation Board</small>
FM 5318	Authority: Sr. Director of Accreditation Effective: 2025/08/27	

Accredited certification bodies (CBs) are required to transition to ISO 37001:2025 by **28 February 2026**.

Declaration by ANAB-Accredited Certification Body

I [name] declare that from the date of this declaration, [CB name]:

- Has implemented changes required under this transition (refer to Annex A).
- Conforms with the requirements of Annex A.
- Can demonstrate evidence of implementation.

I further acknowledge that:

- ANAB will review the implementation of transition against this declaration at the next assessment(s).
- A declaration that is false or cannot be substantiated is a breach of the Conditions of Accreditation and is grounds for suspension or withdrawal.
- ANAB will write nonconformities if gaps with the required changes are identified during the upcoming assessments. The CB will be required to provide correction, cause analysis, corrective action and evidence of implementation.

Signature: _____

Name: _____

Title: _____

Date: _____

Declaration of Transition: Annex A ISO 37001:2025 Transition



Declaration of Transition signed by the CB represents the following activities have been completed:

Activity or Process	Revised Requirements for ISO 37001:2025
Transition Plan	<p>A transition plan has been developed and is being implemented to ensure achievement of revision of the CB's certification program and the CB clients' certification by the due dates.</p> <p>Key dates are:</p> <ul style="list-style-type: none"> – 31 August 2026: All initial and recertification audits to be conducted to ISO 37001:2025 – 28 February 2027: Transition period deadline <p>Refer to: Requirements for Transition in Accreditation Rule 41.</p> <p>Requirement: ISO/IEC 17021-1, 8.5.2 ANAB AG 1008, 2.3</p>
CL 5313, ISO/IEC 17021-1 Requirements Matrix	<p>The CB has revised the content of CL 5313 as necessary to reflect any documentation changes made for the transition to ISO 37001:2025 and will provide it on request (e.g., prior to the next office assessment).</p> <p>Requirement: ANAB Accreditation Manual, MA 5000, 3.11.3</p>
Competence	
Auditors	<p>The CB has determined the necessary competence for ISO 37001:2025 and has a plan to have enough competent auditors to support the revised certification program through the transition period and thereafter.</p> <p>Requirement: ISO/IEC 17021-1, 7.2.2</p>
Other Personnel	<p>The CB has determined the necessary competence for ISO 37001:2025 and has sufficient other personnel (e.g., application reviewer, certification decision maker) deemed competent to support the revised certification program.</p> <p>Requirement: ISO/IEC 17021-1, 7.2.1 and 7.2.8</p>
Audit Duration	<p>The CB has a process to determine audit duration that supports the revised certification program.</p> <p>Requirement: ISO/IEC 17021-1:2015, 9.1.4.1</p>
Certificate Expiration Dates	<p>The CB has a process to manage control of certificates to the revised standard that includes (a) issuing ANAB-accredited certificates only after the ANAB transition decision and (b) managing appropriate expiration dates for previously issued certificates.</p> <p>Requirement: ISO/IEC 17021-1, 8.2.2.c</p>
Auditing Prior to Transition of Accreditation	<p>The CB has a process to manage audits to the revised standard conducted prior to the transition of accreditation. The process to include not issuing ISO 3701:2025 unaccredited certificates.</p> <p>Requirement: ANAB AR 41, 6.5</p>