



# TQCS INTERNATIONAL PTY LTD

ACN 100 435 916

PO Box 483, Woodville, SA 5011  
Australia p: 61 8 8347 0603 f: 61 8 8445  
9423

e: [info@tqcsi.com](mailto:info@tqcsi.com) [www.tqcsi.com](http://www.tqcsi.com)

## POLICY FOR AUDITING & CERTIFICATION TO ISO 37001

*In addition to the General Policy which applies to all Standards, this policy describes interpretations of the requirements for auditing and certification of anti-bribery management systems to ISO 37001 made by TQCSI's Certification Approval Panel. It complements TQCSI Work Instruction 066 (ISO 37001) which should also be referred to by auditors when auditing clients' anti-bribery management systems.*

A **minor nonconformance** is to be raised where:

- a discrepancy which has the potential to have a significant impact on the effectiveness of the anti-bribery management system has not been addressed since being raised at a previous audit
- a serious discrepancy or a number of like discrepancies indicate there is a breakdown in part of the anti-bribery management system
- the objectives of the anti-bribery management system are not established and monitored
- there is insufficient evidence of implementation of corrective actions &/or investigations for identified bribery issues

A **major nonconformance** is to be raised where:

- the agreed action plan to address a minor nonconformance has not been implemented
- a serious discrepancy or a number of like discrepancies indicate there is a total breakdown in the anti-bribery management system.
- There is a very significant breach of legislation or a regulatory requirement

### General Policies:

- Anti-bribery management objectives must be clearly defined, measurable, and aligned with the organisation's commitment to preventing bribery and corruption

Approved: *original authorised through TQCSI Track,  
Documentation*

Craig Bates  
Managing Director & President, TQCSI

Date: 5 May 2025



<https://register.jasanz.org>