

Approver: Operations Director

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Change Log Form

| GENERAL INFORMATION | | | | | |
|----------------------------|-----------------------------------|-----------|------------------------|-----------------------|--|
| Course Developer Manager** | [Donika Muçolli] | | | | |
| Department* | [Training Development Department] | | | | |
| Date* | [2016-10-18] | | | | |
| | Course name: | Language | Current Version | Subsequent Version | |
| Course details* | [ISO 37001 Lead Implementer] | [English] | [1.1] | [1.0] | |

Day 1:

| Slide Number | Slide Description: | Modifications: | Comments |
|--------------|--------------------|---|-----------------|
| No.33 | Scope of ISO 37001 | "This document is only applicable" Notes: "This document does not" "The requirements of this document" | Standard Update |
| No.54 | Definition of ABMS | "in accordance with this document" "to prevent, detect and respond, bribery" Notes: ISO 37001 1 Scope | Standard Update |

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| No.55 | Slide notes extension | Management System: set of interrelated or interacting elements of an organization (3.2) to establish policies (3.10) and objectives (3.11) and processes (3.15) to achieve those objectives (ISO 37001). | Standard Update |
|--------|-----------------------|--|-----------------|
| No.59 | Notes section | "d) the organization's business model" – added | Standard Update |
| No.60 | Notes section | 4.4 "in accordance with the requirements of this document" "to prevent, detect and respond to, bribery." 4.5.1 " b) analyze, assess and prioritize" | Standard Update |
| No. 61 | Notes section | 5.1.1 "b) ensuring that the organization's strategy an anti-bribery policy are aligned" "d) requiring that" | Standard Update |
| No.65 | Notes section | 5.3.2 " c)conforms to the requirements of this document" "Top management can assign" NOTE 1- deleted | Standard Update |
| No. 67 | Notes section | "7.3 Awareness and training " "d) how to recognize"-added | Standard Update |
| No.69 | Notes section | "a) required by this document" 7.5.3 "by this document" | |

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| No. 70 | Notes section | 8.4 "The organization shall implement non-financial controls that manage bribery risk with respect to such areas as procurement, operational, sales, commercial, human resources, legal and regulatory activities." | Standard Update |
|--------|---------------|--|------------------|
| No.71 | Notes section | 8.5.2 "b) 2) where it is not practicable to require the business associate to implement anti-bribery controls, this shall be a factor taken into account in evaluating the bribery risk of the relationship with this business associate (see 4.5 and 8.2) and the way in which the organization manages such risks (see 8.3, 8.4 and 8.5)." | Standard Update |
| No.72 | Notes section | 8.7 "the offering where the offering" "d) after they have in good faith" f) encourage the use by personnel or reporting procedure"- is deleted | Standard Update` |
| No.75 | | 9.2 Internal Audit | Standard Update |
| No.77 | | 9.3 Management review | Standard Update |
| No.79 | | 9.4 Review by Anti-bribery Compliance function | Standard Update |

Day 2:

| Slide Number | Slide Description: | Modifications: | Comments |
|--------------|------------------------|-------------------------------------|-----------------|
| No.19 | ISO 37001 requirements | "the requirements of this document" | Standard Update |

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| No.32 | Notes section | 5.1.1 "b) ensuring that the organization's strategy an anti-bribery policy are aligned" "d) requiring that" | Standard Update |
|--------|---------------|---|-----------------|
| No.122 | Notes section | NOTE Delegation of decision-making does not exempt top management or the governing body (if any) of their duties and responsibilities as described in 5.1. | Standard Update |
| No.125 | Notes section | Modified: Competence Status Authority Independence | Standard Update |

| Day 3: | | | | |
|--------------|------------------------|--|-----------------|--|
| Slide Number | Slide Description: | Modifications: | Comments | |
| No.17 | ISO 37001 Requirements | 7.5.1- "a) documented information required by this document" | Standard Update | |
| No.19. | ISO 37001 Requirements | 7.5.3 "and by this document" | Standard Update | |
| No.42 | Notes section | 7.2.2.1 "d) Personnel will not suffer retaliation" 2) concerns raised or reportsor violation | Standard Update | |

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| No.52 | ISO 37001 requirements | Applicable actions can include, for example, the provision of training to, the coaching of, or the reassignment of personnel or business associates; or the hiring or contracting of the same. | Standard Update |
|-------|------------------------|--|-----------------|
| No.53 | ISO 37001 Requirements | 7.3 d) how to recognize and respond to solicitations or offers of bribes; - added | Standard Update |
| No.85 | Notes section | "The organization can" | Standard Update |
| No.91 | Notes section | "and the way in which the organization manages risks (see 8.3.8.4 and 8.5)- added | Standard Update |
| No.93 | Notes section | A.15.3 | Standard Update |
| No.94 | Notes section | A.15.4 and A.15.5 | Standard Update |
| No.96 | Notes section | 8.9- "f) encourage the use by personnel of the reporting procedures."- deleted | Standard Update |

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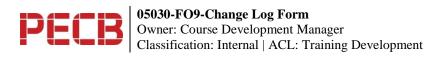
| No.97 | Notes section | b) c) d) | ganization shall implement ures that: require assessment and, where appropriate, investigation of any bribery, or violation of the antibribery policy or the antibribery management system, which is reported, detected or reasonably suspected; require appropriate action in the event that the investigation reveals any bribery, or violation of the anti-bribery management system; empower and enable investigations; require co-operation in the investigation by relevant personnel; require that the status and results of the investigation are reported to the anti-bribery compliance function and other compliance functions, as appropriate; require that the investigation is carried out confidentially and that the outputs of the investigation are confidential. | Standard Update |
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| No.98 | Notes section | A.18.2- "violation" A.18.4 Upon identification of any issue, top management or the compliance function (as appropriate) should then assess the known facts and potential severity of the issue. If they do not already have sufficient facts on which to make a decision, they should commence an investigation. | Standard Update |
|--------|------------------------|--|-----------------|
| No.101 | ISO 37001 Requirements | b) who is responsible for monitoring- added | Standard Update |
| No.114 | Notes section | Exercise 11: Example: Trop Management review (9.3.1) Employment process | Standard update |

Day 4:

| Slide Number | Slide Description: | Modifications: | Comments |
|--------------|--|------------------------------------|-----------------|
| No.4 | Review by anti-bribery compliance function | Clause 9.4 | Standard Update |
| No.5 | Internal Audit | Clause 9.2 | Standard Update |
| No.32 | Top Management review | Clause 9.3 | Standard Update |
| No.33 | Governing body review | Clause 9.3.2 | Standard Update |
| No.34 | Notes section | Clause 9.3.1 Top management review | Standard Update |
| No.68 | Scope of ISO 37001 | "This document" | Standard Update |



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