PECB BEYOND RECOGNITION

Exam Preparation Guide

ISO 37001 Lead Implementer

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GENERAL

The objective of the "PECB Certified ISO 37001 Lead Implementer" exam is to ensure that the candidate has the necessary competence to support an organization in establishing, implementing, operating, maintaining, and continually improving an anti-bribery management system (ABMS).

The ISO 37001 Lead Implementer exam is intended for:

- Managers and consultants wishing to develop a thorough understanding of ISO 37001 requirements for an anti-bribery management system
- Managers and consultants seeking a comprehensive implementation framework
- Managers responsible for practicing due diligence with regard to bribery risks
- Individuals wishing to contribute to maintaining organizational integrity by supporting ethical behavior
- Managers and members of governance, risk management, and compliance teams
- Individuals aspiring to become anti-bribery consultants

The exam covers the following competency domains:

- **Domain 1:** Fundamental principles and concepts of an anti-bribery management system
- **Domain 2:** Anti-bribery management system (ABMS) requirements
- **Domain 3:** Planning of an ABMS implementation based on ISO 37001
- **Domain 4:** Implementation of an ABMS based on ISO 37001
- **Domain 5:** Monitoring and measurement of an ABMS based on ISO 37001
- **Domain 6:** Continual improvement of an ABMS based on ISO 37001
- **Domain 7:** Preparation for an ABMS certification audit

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The content of the exam is divided as follows:

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Domain 1: Fundamental principles and concepts of an anti-bribery management system (ABMS)

Main objective: Ensure that the candidate understands and is able to interpret ISO 37001 principles and concepts
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Competencies
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Knowledge statements
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1. Ability to understand the applicability and scope of ISO 37001
2. Ability to explain the connection between ISO 37001 and other ISO standards, such as ISO 19600, ISO 31000, and ISO 26000
3. Ability to communicate the advantages of implementing an ABMS based on ISO 37001
4. Ability to illustrate the connection between ISO 37001 and Sustainable Development Goals (SDGs)
5. Ability to explain what a management system is
6. Ability to understand the structure of ISO 37001
7. Ability to distinguish between the core terms related to ABMS: bribery, bribery risk, business associate, public official, conflict of interest
8. Ability to explain the anti-bribery management principles, as defined by UK's Ministry of Justice
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1. Knowledge of the ISO 37001 scope
2. Knowledge of the relationship between ISO 37001 and other ISO standards
3. Knowledge of the advantages of implementing an ABMS based on ISO 37001
4. Knowledge of the relationship between ISO 37001 and SDGs
5. Knowledge of the ISO's definition for a management system
6. Knowledge of ISO 37001's structure
7. Knowledge of the core terms related to the ABMS and ISO's definitions for those terms
8. Knowledge of the six principles of anti-bribery management, as set out by UK Ministry of Justice
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Domain 2: Anti-bribery management system (ABMS) requirements

Main objective: Ensure that the candidate understands and is able to interpret and provide guidance on how to implement and manage an ABMS based on the requirements and guidance of ISO 37001

Competencies	Knowledge statements
1. Ability to implement an ABMS based on the requirements of ISO 37001	1. Knowledge of the ISO 37001 requirements and guidance
2. Ability to describe the standard's requirements with regard to the context of the organization, interested parties, ABMS scope, and bribery risk assessment (clause 4)	2. Knowledge of the common external and internal issues that affect the context of an organization, approaches to establishing the scope, as well as the methodologies used for bribery risk assessments
3. Ability to work with and encourage the top management and governing body to demonstrate leadership and commitment, establish an anti-bribery policy, and identify the roles and responsibilities related to the ABMS (clause 5)	3. Knowledge of the requirements with regard to top management and governing body involvement and methods to define roles and responsibilities
4. Ability to identify risks and opportunities and to define anti-bribery objectives (clause 6)	4. Knowledge of the approaches used in risk management and strategies used in establishing objectives
5. Ability to ensure that sufficient resources are available to implement, operate, and maintain the ABMS (clause 7)	5. Knowledge of the required resources, competences, awareness, and documented information for an effective ABMS
6. Ability to implement and operate the ABMS and its processes and controls (clause 8)	6. Knowledge of the requirements for operational planning and control and the processes that must include specific controls (due diligence, financial and non-financial controls, anti-bribery commitments, investigating and dealing with bribery, etc.)
7. Ability to use monitoring, measurement, analysis, and evaluation to support the effective management of the ABMS (clause 9)	7. Knowledge of the approaches, techniques, and programs used for the monitoring, measurement, analysis, evaluation, internal audits, and management reviews
8. Ability to analyze and take appropriate actions when nonconformities occur and to continually improve the suitability, adequacy, and effectiveness of the ABMS (clause 10)	8. Knowledge of the requirement and approaches to dealing with nonconformities and initiating corrective actions, as well as the methods to continually improve an ABMS

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Domain 3: Planning of an ABMS implementation based on ISO 37001

Main objective: Ensure that the candidate is able to plan the implementation of the ABMS based on ISO 37001 requirements and guidance

Competencies	Knowledge statements
1. Ability to help an organization determine external and internal issues relevant to its purpose and that can affect the ability to achieve the intended outcomes of the ABMS	1. Knowledge of the approaches used in determining the external and internal issues of an organization
2. Ability to identify the interested parties of an organization	2. Knowledge of the techniques used for the identification and management of interested parties
3. Ability to conduct a gap analysis	3. Knowledge of the gap analysis methodologies
4. Ability to assist an organization in establishing the scope of the ABMS	4. Knowledge of the standard's requirements for the ABMS scope and other factors that influence its establishment
5. Ability to develop an anti-bribery policy to orientate an organization with regard to anti-bribery	5. Knowledge of the standard's requirements for an anti-bribery policy, approaches to developing a policy, and the suggested policy content and structure
6. Ability to establish anti-bribery objectives at relevant functions and levels	6. Knowledge of the approaches used in establishing objectives
7. Ability to identify risks and opportunities to the ABMS	7. Knowledge of risk assessment methodologies, such as the one recommended by ISO 31000
8. Ability to determine the optimal human, technical, informational, and financial resources needed for the ABMS	8. Knowledge of the typical resources required for the establishment, implementation, and maintenance of a management system
9. Ability to plan and manage the competences needed to operate the ABMS	9. Knowledge of competence analysis approaches and training programs
10. Ability to raise awareness with regard to the ABMS among the persons doing work under the organization's control	10. Knowledge of the common strategies and approaches used for raising awareness
11. Ability to communicate relevant information to support ethical behavior, the ABMS, and the achievement of anti-bribery objectives	11. Knowledge of the principles of effective communication and methods
12. Ability to ensure that the organization properly controls the necessary documented information	12. Knowledge of the actions required to ensure the control, availability, and suitability of essential documented information

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Domain 4: Implementation of an ABMS based on ISO 37001

Main objective: Ensure that the candidate is able to implement the processes of an ABMS required for an ISO 37001 certification

Competencies	Knowledge statements
1. Ability to conduct due diligence in relation to specific transactions, projects, activities, business associates, and personnel	1. Knowledge of the requirements for due diligence, as well as the categories to which it is applied
2. Ability to implement financial controls that manage bribery risk	2. Knowledge of the potential financial controls that could be implemented in specific cases
3. Ability to implement non-financial controls that manage bribery risk	3. Knowledge of the approaches used in establishing non-financial controls and their applicability
4. Ability to ensure that reasonable and proportionate anti-bribery procedures are established by business associates and other organizations under the control of the organization	4. Knowledge of the requirements and procedures that business associates and other organizations under the control of the main organization implement to combat bribery
5. Ability to draft anti-bribery commitments to which business associates must adhere	5. Knowledge of the applicability of anti-bribery commitments and approaches used to establish them
6. Ability to implement procedures regarding gifts, hospitality, donations, and similar benefits	6. Knowledge of the possible controls that organizations could implement with regard to gifts, hospitality, donations, and other benefits
7. Ability to determine the actions to be taken when anti-bribery controls are deemed inappropriate	7. Knowledge of the actions and cases the organization is required to undertake when anti-bribery controls are deemed inappropriate
8. Ability to implement appropriate procedures about raising concerns	8. Knowledge of the requirements that an organization must adhere to regarding the procedures for raising concerns
9. Ability to establish procedures that allow organizations to investigate and deal with bribery	9. Knowledge of the possible approaches used for the investigation and dealing with bribery, as well as the standard's requirements in this regard

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Main objective: Ensure that the candidate is able to evaluate, monitor, and measure the performance of an ABMS

Competencies	Knowledge statements
1. Ability to monitor and evaluate the effectiveness of an ABMS 2. Ability to determine information needs 3. Ability to define the measurement-related roles and responsibilities 4. Ability to establish performance indicators 5. Ability to establish appropriate procedures for reporting the results to relevant interested parties 6. Ability to verify to what extent the identified anti-bribery objectives have been met 7. Ability to define and implement an ABMS internal audit program 8. Ability to perform regular and methodical reviews to ensure the suitability, adequacy, effectiveness, and efficiency of an ABMS based on the policies and objectives of the organization 9. Ability to define and perform a management review process	1. Knowledge of the best practices and techniques used to monitor and evaluate the effectiveness of an ABMS 2. Knowledge of the importance of defining information needs and the activities that can be performed to determine them 3. Knowledge of the functions involved in monitoring, measurement, analysis, and evaluation 4. Knowledge of the purpose of performance indicators and approaches to establishing them 5. Knowledge of the approaches used in reporting the results 6. Knowledge of the concepts related to measurement and evaluation 7. Knowledge of the main concepts and components related to the implementation and operation of an ABMS internal audit program 8. Knowledge of the difference between a major and a minor nonconformity 9. Knowledge of the guidelines and best practices to draft a nonconformity report 10. Knowledge of the best practices used to perform management reviews

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Domain 6: Continual improvement of an ABMS based on ISO 37001

Main objective: Ensure that the candidate is able to provide guidance on the continual improvement of an ABMS

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Competencies	Knowledge statements
1. Ability to track and take action on nonconformities 2. Ability to identify and analyze the root causes of nonconformities and propose action plans to treat them 3. Ability to guide an organization on how to continually improve the effectiveness and efficiency of an ABMS 4. Ability to implement continual improvement processes in an organization 5. Ability to determine the appropriate tools to support the continual improvement processes of an organization	1. Knowledge of the main processes, tools, and techniques used to identify the root causes of nonconformities 2. Knowledge of the treatment of nonconformities process 3. Knowledge of the main processes, tools, and techniques used to develop corrective action plans 4. Knowledge of the main concepts related to continual improvement 5. Knowledge of the processes related to the continual monitoring of change factors 6. Knowledge of the maintenance and improvement of an ABMS

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Domain 7: Preparation for an ABMS certification audit

Main objective: Ensure that the candidate is able to prepare an organization for the certification against ISO 37001

Competencies	Knowledge statements
1. Ability to understand the main steps, processes, and activities related to the ISO 37001 certification audit	1. Knowledge of the evidence-based approach to an audit
2. Ability to understand, explain, and illustrate the audit evidence approach in an ABMS audit	2. Knowledge of the types of audit and their differences
3. Ability to counsel an organization to identify and select a certification body that meets their expectations	3. Knowledge of the differences between Stage 1 and Stage 2 audits
4. Ability to determine an organization's preparation for the ISO 37001 certification audit	4. Knowledge of the Stage 1 audit requirements, steps, and activities
5. Ability to train and prepare an organization's personnel for the ISO 37001 certification audit	5. Knowledge of the documented information review criteria
6. Ability to argue and challenge the audit findings and conclusions with external auditors	6. Knowledge of the Stage 2 audit requirements, steps, and activities
	7. Knowledge of the audit follow-up requirements, steps, and activities
	8. Knowledge of surveillance audits and recertification audit requirements, steps, and activities
	9. Knowledge of the requirements, guidelines, and best practices for developing action plans following an ISO 37001 certification audit

Based on the above-mentioned domains and their relevance, 12 questions are included in the exam, as summarized in the table below:

			Level of understanding (Cognitive/Taxonomy) required				
		Points per question	Questions that measure comprehension, application, and analysis	Questions that measure synthesis and evaluation	Number of questions per competency domain	% of the exam devoted to each competency domain	Number of points per competency domain	% of points per competency domain
Competency domains	Fundamental principles and concepts of an anti-bribery management system	5	X		1	8.33	5	6.67
	Anti-bribery management system (ABMS) requirements	5	X		1	8.33	5	6.67
	Planning the ABMS implementation based on ISO 37001	5		X	1	8.33	5	6.67
	Implementing the ABMS based on ISO 37001	5	X		4	33.33	30	40
		5	X					
		10		X				
		10		X				
	Performance evaluation, monitoring and measurement of the ABMS based on ISO 37001	5		X	3	25	15	20
		5	X					
		5	X					
	Continual improvement of the ABMS based on ISO 37001	5		X	1	8.33	5	6.67
	Preparing for an ABMS certification audit	10		X	1	8.33	10	13.34
	Total points	75						
	Number of questions per level of understanding		6	6				
	% of the exam devoted to each level of understanding (cognitive/taxonomy)		50	50				

The exam passing score is **70%**.

After successfully passing the exam, candidates will be able to apply for a PECB Certified ISO 37001 Lead Implementer credential, depending on their level of experience.

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Taking the Exam

General Information on the Exam

Candidates are required to arrive/be present at least 30 minutes before the exam starts. Candidates who arrive late will not be given additional time to compensate for the late arrival and may not be allowed to sit for the exam.

Candidates are required to bring a valid identity card (a national ID card, driver's license, or passport) and show it to the invigilator.

If requested on the day of the exam (paper-based exams), additional time can be provided to candidates taking the exam in a non-native language, as follows:

- 10 additional minutes for Foundation exams
- 20 additional minutes for Manager exams
- 30 additional minutes for Lead exams

PECB Exam Format and Type

1. Paper-based: Exams are provided on paper, where candidates are not allowed to use anything but the exam paper and a pen. The use of electronic devices, such as laptops, tablets, or phones, is not allowed. The exam session is supervised by a PECB approved Invigilator at the location where the Reseller has organized the training course.

2. Online: Exams are provided electronically via the PECB Exams application. The use of electronic devices, such as tablets and cell phones, is not allowed. The exam session is supervised remotely by a PECB Invigilator via the PECB Exams application and an external/integrated camera.

For more detailed information about the online format, please refer to the PECB Online Exam Guide.

PECB exams are available in two types:
1. Essay-type question exam
2. Multiple-choice question exam

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This exam comprises essay-type questions. They are used to determine and evaluate whether a candidate can clearly answer questions related to the defined competency domains. Additionally, problem-solving techniques and arguments that are supported with reasoning and evidence will also be evaluated.

The exam is open book and is not intended to measure memorizing or recalling information. It aims to evaluate candidates' comprehension, analytical skills, and applied knowledge. Therefore, candidates are required to provide logical and convincing answers and explanations in order to demonstrate that they have understood the content and the main concepts of the competency domains.

Since the exam is "open book," candidates are authorized to use the following reference materials:

• A hard copy of ISO 37001
• Training course materials(accessed through PECB Exams app and/or printed)
• Any personal notes taken during the training course(accessed through PECB Exams app and/or printed)
• A hard copy dictionary

Any attempts to copy, collude, or otherwise cheat during the exam session will automatically lead to failure of the exam.

PECB exams are available in English and other languages. For the availability of the exam in a particular language, please contact examination@pecb.com.

Note: PECB will progressively transition to multiple-choice exams. They will also be open book and comprise scenario-based questions that will allow PECB to evaluate candidates' knowledge, abilities, and skills to use information in new situations (apply), draw connections among ideas (analyze), and justify a stand or decision (evaluate). All PECB multiple-choice exams have one question and three alternatives, of which only one is correct.

For specific information about exam types, languages available, and other details, visit the List of PECB Exams.

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Receiving the Exam Results

Exam results will be communicated via email. The only possible results are *pass* and *fail;* no specific grade will be included.

- The time span for the communication starts from the exam date and lasts three to eight weeks for essay type exams and two to four weeks for multiple-choice paper-based exams

- For online multiple-choice exams, candidates receive their results instantly

Candidates who successfully complete the exam will be able to apply for one of the credentials of the respective certification scheme.

For candidates who fail the exam, a list of the domains where they have performed poorly will be added to the email to help them prepare better for a retake.

Candidates that disagree with the results may request for a re-evaluation by writing to results@pecb.com within 30 working days of receiving the results. Re-evaluation requests received after 30 days will not be processed. If candidates do not agree with the results of the reevaluation, they have 30 working days from the date when they received the reevaluated exam results to file a complaint through the PECB Ticketing System. Complaints received after 30 days will not be processed.

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Exam Retake Policy

There is no limit on the number of times that a candidate may retake an exam. However, there are certain limitations in terms of the allowed time frames between exam retakes.

- If a candidate does not pass the exam on the 1st attempt, they must wait 15 days from the initial date of the exam for the next attempt (1st retake). Retake fees apply.
  Note: *Candidates who have completed the training course but failed the exam are eligible to retake the exam once for free within a 12-month period from the initial date of the exam.*
- If a candidate does not pass the exam on the 2nd attempt, they must wait three months after the initial date of the exam for the next attempt (2nd retake). Retake fees apply.
  Note: *For candidates that fail the exam in the 2nd retake, PECB recommends them to attend a training course in order to be better prepared for the exam.*
- If a candidate does not pass the exam on the 3rd attempt, they must wait six months after the initial date of the exam for the next attempt (3rd retake). Retake fees apply.
- After the 4th attempt, the waiting period for further retake exams is 12 months from the date of the last attempt. Retake fees apply.

To arrange exam retakes (date, time, place, costs), candidates need to contact the PECB Reseller/Distributor who has initially organized the session.

Reschedule the Exam

For any changes with regard to the exam date, time, location, or other details, please contact examination@pecb.com.

Closing a Case

If a candidate does not apply for the certificate within three years, their case will be closed. Candidates whose case has been closed due to the expiration of the certification period have the right to request to reopen their case. However, PECB will no longer be responsible for any changes in the conditions, standards, policies, candidate handbook, or exam preparation guide that were applicable before the case was closed. A candidate requesting their case to reopen must do so in writing and pay the required fee.

Exam Security

A significant component of a successful and respected professional certification credential is maintaining the security and confidentiality of the exam. PECB relies upon the ethical behavior of certificate holders and applicants to maintain the security and confidentiality of PECB exams. Any disclosure of information about the content of PECB exams indicates violation of PECB's Code of Ethics. PECB will take action against individuals who violate PECB Policies and the Code of Ethics. These actions include permanently barring individuals from pursuing PECB credentials and revoking the awarded credentials. PECB will also pursue legal action against individuals or organizations who infringe upon its copyrights, proprietary rights, and intellectual property.

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Sample Exam Questions

1. Interpretation of ISO clauses

For each of the following clauses of ISO 37001, provide an action plan with at least two concrete actions that would be acceptable to ensure conformity to the clause and fulfill control objectives.

Clause 5.2 Anti-bribery policy

Possible answer:

- *Establishment of a an anti-bribery policy compliant with anti-bribery objectives of the company and appropriate to the purpose of the company*
- *Communication of anti-bribery policy in appropriate languages within the organization and to business associate who pose more than a low risk of bribery*

2. Development of metrics

For each of the following clauses of ISO 37001, provide two examples of metrics that would be acceptable to measure the conformity to the clause.

Clause 9.3 Internal audit

Possible answer:

- *Number of internal audits that have been conducted at the planned time*
- *Results of internal audits*