# Annex C: Surveillance Plan

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| **Surveillance Plan ISO 37001:2016** | | | | | | |
| **1**: Initial Audit  **2:** Surveillance 1 Audit  **3**: Surveillance 2 Audit  **4**: Recertification Audit | | | **Plan** | | | |
| **1**  **(202X)** | **2**  **(202X)** | **3**  **(202X)** | **4**  **(202X)** |
| **4 Context of the organization** | | | | | | |
| **4.1** | Understanding the organization and its context | |  |  |  |  |
| **4.2** | Understanding the needs and expectations of stakeholders | |  |  |  |  |
| **4.3** | Determining the scope of the anti-bribery management system | |  |  |  |  |
| **4.4** | Anti-bribery management system | |  |  |  |  |
| **4.5** | Bribery risk assessment | |  |  |  |  |
| **5 Leadership** | | | | | | |
| **5.1** | Leadership and commitment | |  |  |  |  |
| **5.2** | Anti-bribery policy | |  |  |  |  |
| **5.3** | Organizational roles, responsibilities and authorities | |  |  |  |  |
| **6 Planning** | | | | | | |
| **6.1** | Actions to address risks and opportunities | |  |  |  |  |
| **6.2** | Anti-bribery objectives and planning to achieve them | |  |  |  |  |
| **7 Support** | | | | | | |
| **7.1** | Resources | |  |  |  |  |
| **7.2** | Competence | |  |  |  |  |
| **7.3** | Awareness | |  |  |  |  |
| **7.4** | Communication | |  |  |  |  |
| **7.5** | Documented information | |  |  |  |  |
| **8 Operation** | | | | | | |
| **8.1** | Operational planning and control | |  |  |  |  |
| **8.2** | Due diligence | |  |  |  |  |
| **8.3** | Financial controls | |  |  |  |  |
| **8.4** | Non-financial controls | |  |  |  |  |
| **8.5** | Implementation of anti-bribery controls by controlled organizations and by business associates | |  |  |  |  |
| **8.6** | Anti-bribery commitments | |  |  |  |  |
| **8.7** | Gifts, hospitality, donations and similar benefits | |  |  |  |  |
| **8.8** | Managing inadequacy of anti-bribery controls | |  |  |  |  |
| **8.9** | Raising concerns | |  |  |  |  |
| **8.10** | Investigating and dealing with bribery | |  |  |  |  |
| **9 Performance evaluation** | | | | | | |
| **9.1** | Monitoring, measurement, analysis and evaluation | |  |  |  |  |
| **9.2** | Internal audit | |  |  |  |  |
| **9.3** | Management review | |  |  |  |  |
| **9.4** | Review by anti-bribery compliance function | |  |  |  |  |
| **10 Improvement** | | | | | | |
| **10.1** | Nonconformity and corrective action | |  |  |  |  |
| **10.2** | Continual improvement | |  |  |  |  |
| **11 Additional requirements** | | | | | | |
|  | Use of Logo | |  |  |  |  |
|  | List of documents included in the audited MS | |  |  |  |  |
| Notes and comments: | |  | | | | |

*For completed visits, mark “X” in the box for each clause/process covered.*

*For planned visits, mark “O” in the box for each clause/process to be covered.*