

ISO 37001:2025 Transition Arrangements

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Objectives

The objectives of the present document are :

- to provide ISONIKE Ltd's certified clients with the necessary information on the transition arrangements from ISO 37001:2016 to ISO 37001:2025..
- to provide ISONIKE Ltd's potential clients with the necessary information on the transition arrangements from ISO 37001:2016 to ISO 37001:2025..
- to outline the steps that certified clients need to follow to transition their certification to ISO 37001:2025

Introduction

A new edition of the ISO 37001 family of standards has been issued by ISO:

- **ISO 37001:2025** Anti-bribery management systems — Requirements with guidance for use

The new edition has an impact on both the existing and the future ISO 37001 certificates.

International Accreditation Forum Inc (IAF) Mandatory Document (MD) [IAF MD 30](#) Issue 1 was issued on 10th of October 2025. This document defines the transition requirements for Accreditation Bodies (ABs) and Conformity Assessment Bodies (CABs) that provide accreditation and accredited certification to the ISO 37001 standard.

Key Timescales

- According to the regulatory framework set by [IAF MD 30](#), the **transition period** started with immediate effect from the publication of the new version of the standard and ends on **28th of February 2027**.
- By that date (28 February 2027), all certified clients to ISO 37001:2016 are required to have completed their transition to ISO 37001:2025.
- At Client's request, new certificates to ISO 37001:2016 standard may be issued within the transition period and up to **31 August 2026**. Thereafter, no new certificates to ISO 37001:2016 standard will be provided by ISONIKE. Same deadline applies both to new certifications and re-certifications.
- All new certificates to ISO 37001:2016 standard will carry an expiry date on **28th of February 2027**.
- ISONIKE is obligated and will proceed with replacing all ISO 37001:2016 certificates that are issued already and carry an expiry date later than 28th of February 2027. Nevertheless on 28th of February 2027, all ISO 37001:2016 certificates will either expire or be withdrawn.

Key Dates and Deadlines for the Transition

Date	Description of deadline
31 August 2026	Planned deadline for issuing new certificates to ISO 37001:2016. Important notice: The term 'new certificates' applies to certificates from initial certification and from re-certification.
30 November 2026	Planned deadline for the transition of all ISO 37001:2016 certified clients to ISO 37001:2025 Important notice: Certified clients to ISO 37001:2016 that have not completed the transition to ISO 37001:2025 by this date are in risk of having their certificate withdrawn or expired on 28 February 2027. ISONIKE can not guarantee the availability of audit resources for transition applications received after 30 November 2026.
28 February 2027	Regulatory deadline for all ISO 37001:2016 certificates. Important notice: All ISO 37001:2016 certificates will either expire or be withdrawn on this date.

Transition Audit Approach

ISO 37001:2016 certified clients are required to have a transition audit to the ISO 37001:2025 version of the standard within the transition period. The transition audit will not only rely on document review – but will require the reviewing of the relevant implementation evidence and documented information.

The transition audit may require additional time (see following page) and may be conducted in conjunction with the surveillance audit, recertification audit or through a separate audit.

The transition audit will assess the following aspects (including but not limited to):

- the gap analysis of ISO 37001:2025, as well as the need for changes to the client's ABMS;
- the updating of the ABMS documented information ;

Transition audits may be conducted either with **physical visit** or **remotely** if the transition objectives are met.

Transition Audit Programme

Certified Clients to ISO 37001:2016 by ISONIKE may either:

1. Request an extra (separate) audit for the transition – at any time within the certification cycle;
2. Request to have their transition audit planned with their next Surveillance visit
3. Request to have their transition audit planned with their next ReCertification visit (provided that this recertification visit takes place before 31 August 2026.)

According to regulatory framework set by IAF MD 30, the need for **additional audit time** shall be determined depending on the company's specific parameters (size, complexity etc). This is unlikely to exceed 0.5 day.

Note: The exact additional audit time, the method of the audit (onsite or remotely) as well as the relevant costs are determined, reviewed and advised to the client upon receipt of the “Application for Transition to ISO 37001:2025” (see next paragraphs). These are confirmed with the clients upon receipt of their Application for Transition.

ISONIKE is providing ISO 37001:2025 non accredited certificates to applicants upon their request with **immediate effect** – should this is required by the client. These will be replaced with accredited certificates once the accreditation transition is confirmed by the accreditation body (ESYD).

Transition Process Steps for Certified Clients (1 of 3)

The steps of the transition process are summarized as following :

- Certified Clients are required to plan, amend and prepare their ABMS to ISO 37001:2025 requirements.
- When ready, Certified Clients are invited to give a notice of readiness to ISONIKE. Then they will be invited to complete and submit the ISONIKE's "**Application for Transition to ISO 37001:2025**" to ISONIKE. On this application they need to denote their preference as to when they would like the Transition Audit to take place (i.e. separate visit, next surveillance visit, recertification visit).
- In order to allow sufficient time for the planning of the Transition Audit, the "Application for Transition to ISO 37001:2025" should be received by ISONIKE at a minimum of 90 days in advance of the intended (by the client) date of the audit.
- Upon receipt of the "Application for Transition to ISO 37001:2025", ISONIKE will conduct an application review with evaluating applicable parameters and situational factors. Based on this review, ISONIKE will determine the additional audit time, the method of the audit (onsite or remotely) as well as the relevant costs. These will be advised to clients.

Transition Process Steps for Certified Clients (2 of 3)

- The **Transition Audit** will be planned and require:
 - **Document Review**
 - ISONIKE will send an “**ISO 37001:2025 Transition Check List**” to client for completion. The client will need to complete the check list with the required information and return it to ISONIKE together with the supporting documented information.
 - ISONIKE will then conduct the review of the documented information. The result will be communicated to the client for further actions (if required).
 - **Review of Evidence for Implementation .**
 - ISONIKE will liaise with the client, plan and conduct the review of the implementation evidence. This will be done onsite or remotely depending on the method chosen (see previous paragraph).
- Note: The Transition Audit will be planned and conducted in conjunction with the surveillance audit, recertification audit or through a separate audit.

Transition Process Steps for Certified Clients (3 of 3)

- Following successful conduct of the transition audit, and provided no pending issues remain, ISONIKE will proceed with an independent review of the file and will take the certification decision of the issuance of ISO 37001:2025 certificate to the client.
- Given that the process is completed within the transition period, the new ISO 37001:2025 certificate will follow the original three-year certification cycle of the original ISO 37001:2016 certificate.

Notes:

Until ESYD completes the accreditation transition arrangements and process, ISONIKE (and all CABs) are mandated to issued non-accredited ISO 37001:2025 certificates.

ISONIKE will replace the non accredited ISO 37001:2025 certificates with accredited ones once the accreditation transition process has been completed.

Transition Process Steps for New Clients

New Clients have the option to apply for certification to ISO 37001:2016 or to ISO 37001:2025 until 31 August 2026. Thereafter, all new applications shall be to ISO 37001:2025 only.

- Applications for certification to ISO 37001:2016 will be accepted if received until 31 August 2026. – provided that arrangements and certification audits are planned & conducted promptly by that date.
- **All new certificates to ISO 37001:2016 will expire on 27/2/2027.** This expiry date will appear on the certificate as this is the date that the validity of the ISO 37001:2016 version of the standard expires.
- Certified clients to ISO 37001:2016 will then need to make the transition to ISO 37001:2025 as described in the Transition Process Steps for Certified Clients in the previous pages of the present document.
- Once the transition process is completed, ISONIKE will replace the ISO 37001:2016 certificate with an ISO 37001:2025 certificate which will follow the original three-year certification cycle of the original ISO 37001:2016 certificate

Disclaimer

ISONIKE reserves the right to amend the present arrangements should IAF or the AB (ESYD) requests amended or additional transition arrangements.

For any additional information or clarification please do not hesitate to contact ISONIKE HQ or contact any ISONIKE assessor.



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