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Applying ISO 37001 Across Cultures: Cross-Learning from Peru and Australia

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Abstract– In this article, you will find an exploration of how the anti bribery MGT. standard ISO 37001 is interpreted and applied to two very different governance and cultural contexts — Peru and Australia. Both countries are very well integrated into the global economy; they are subject to high levels of demand from investors, lenders, and international partners; and while they both have different levels of institutional maturity, different levels of perceived levels of corruption and different levels of compliance traditions. In comparison to Australia, ISO 37001 is typically embedded within Australia's long-established rule of law system, its strong enforcement agencies and compliance culture that has combined anti bribery programs with enterprise risk management, corporate governance and environmental social and governance agendas. On the other hand, Peru has experienced a number of high-profile corruption scandals, has limited enforcement capability, and is experiencing high levels of public distrust; however, Peru is also one of the early leaders in the Latin American region in adopting ISO 37001, particularly in the construction, mining, and public procurement industries, in many cases as a result of the requirements of multilateral financing agencies and pressure from exports into international markets. Utilizing a comparative qualitative Research Methodology, this article draws together secondary sources of literature, governance indicators, and case-based evidence to develop a Comparative Analysis of the similarities and differences between two Countries. The analysis identifies the institutional conditions whereby ISO 37001 will go from a simple certification to acting as an enabler of cultural and organizational change. It demonstrates how leadership commitment, integration with existing risk management systems, and the consideration of local social expectations are key to achieving success. Additionally, the research contends that Peru can adopt the monitoring and enforcement practices established by Australia as best practice and vice versa, whereby Australian organisations will be able to learn from the experiences of their Peruvian counterparts in establishing effective community engagement and improving levels of Transparency in higher risk industries.

Keywords- ISO 37001, anti-bribery management systems, compliance, corporate governance.

I. INTRODUCTION

As a structural impediment to growth, equal opportunity, and confidence in market operations and governmental bodies, corruption is seen as one of the greatest challenges in the world today. A series of studies conducted in the developing countries focused initially on the impacts of corruption in terms of creating inefficiencies and inequities in the provision of services [1]; subsequently, later studies focused on the effects that corruption has upon investment, corporate value, and creating legitimacy for regulating bodies [2]. The combination of binding international treaties along with nonbinding soft law instruments has produced a growing global regime whose purpose is to establish some level of expectations concerning the methods of preventing, identifying, and punishing illegal acts of bribery committed by both state and non-state actors.

Management system standards transform laws and ethics into organizational systems, procedures, controls, and documentation. The International Organisation for Standardisation (ISO) created ISO 37001 in 2016 to help organisations develop a structured anti-bribery management system. The ISO 37001 standard is based on an organisation's risk-based approach to anti-bribery management, as well as internal controls to support such systems and continuous improvement of the overall performance of such systems. Studies show that organisations benefit the most when ISO 37001 is integrated with an organisation's broader risk/compliance architecture, such as ISO 31000 (risk management) and ISO 37301 (compliance management), and viewed as part of an organisation's corporate social responsibility/sustainability agenda instead of just a checklist [3], [4], [5].

The growth of ISO 37001 has been particularly high in areas where corruption has been a major issue, especially through the influence of multilateral funding institutions, (for example) Latin America which has seen some successes and challenges when it comes to the implementation of ISO 37001 [6]. In Peru, despite facing several issues around integrity and poor governance performance indicators, has been one of the first countries to adopt ISO 37001 mainly because of the amount of public procurement and infrastructure development that occurs [7], [8]. Australia, on the other hand, is a country that operates in an environment with good rule of law, a high degree of corruption control, and a strong tradition of enforcing laws against foreign bribery as well as established corporate compliance structures, will most likely experience increasing numbers of cases that highlight the risk associated with corporate behaviours and political financing [9].

Most scholarships surrounding ISO 37001 have taken a national approach or a generalist perspective, resulting in little comparative evidence about how these standards are applied and interpreted around the world. This article attempts to rectify this by providing The comparative contribution of this article shows that ISO 37001 performs different governance functions depending on the institutional environment in which it is adopted. ; Thus, creating questions regarding when ISO 37001 transitions from being a savvy commercial certification tool to providing institutional and cultural momentum toward transformation. To achieve this, the analysis is based on recent academic and policy literature, governance indicators, and sector-specific case studies to identify empirical avenues for cross-learning by regulators, multilateral organizations and companies using ISO 37001 as a governance mechanism.

II. Literature Review

As the debate on corruption and the responsibility of corporations evolved, it changed from an emphasis on individual misconduct to a more systemic analysis of the relationships between institutions, incentives, and government structures that create a context for bribery. Early research findings on administrative performance in less developed and developing countries documented the extent to which corruption reduces efficiency, equity, and trust in public institutions [1]. Recent empirical and theoretical developments have continued to demonstrate how the use of bribery impedes investment, distorts competition, and diminishes the credibility of both markets and governments by making a strong economic and moral case for establishing effective anti-bribery regimes [2].

In addition, there has been a rapid increase in the number of international instruments over the past 20 years that define the anti-corruption obligations of both countries and companies. Examples of these instruments are the OECD Anti-Bribery Convention, the United Nations Convention Against Corruption, and sector-specific soft law guidelines. When reviewing these instruments, it has been observed that they have created a complex network of "governance regimes", generating increased convergence between countries with respect to legal standards, while still allowing significant room for each country's interpretation and enforcement of its own laws. As part of this framework, some management system standards have evolved to provide an additional governance mechanism by translating the legal requirements into a company's operational processes, managing controls and documenting them accordingly.

The introduction of ISO 37001 in 2016 formalized the global trend of utilizing anti-bribery management systems. ISO 37001 establishes requirements for anti-bribery management systems (which may be applied to all three sectors – public sector, business sector, and non-profit organizations) and provides guidance on developing anti-bribery management systems using a risk-based approach, as well as continuous improvement processes; development of top management commitment and implementation of measures to manage bribery and corruption; as well as maintaining an ongoing responsibility for compliance through the development of policies and procedures that govern company conduct. The development of ISO 37001 includes, but is not limited to, the following items: A top level of commitment from the organisation; an assessment of the bribery risk to the organisation and an understanding of these risks. A range of financial and non-financial checks and balances are built into the organisation; Appropriate use of training, procedures for reporting instances of bribery, processes for investigating instances of bribery, etc. [3]. Studies comparing and analysing the success of ISO frameworks to date support that success is most apparent when an organisation utilises ISO frameworks such as ISO 31000, which provides a framework for implementing risk management and ISO 37301; this is due to the fact that both standards include the concept that bribery and corruption should be treated by an organisation as a strategic risk, not merely a legal risk [3][4].

Corporate social responsibility (CSR) and sustainability goals increasingly receive attention from both the academic community and practitioners through the lens of how anti-bribery management systems work together with these issues. Structured anti-bribery programmes have been found to build credibility in organisations' CSR credibility because stakeholders often do not trust social or environmental commitments without reliable protection against corruption [5]. However, more recently, qualitative research involving managers has demonstrated that anti-bribery systems may support sustainable business practices when they are created as frameworks for learning to identify risk trends, increase internal communication, and reshape supplier relationships [10].

The reason that ISO 37001 has spread throughout Latin America is due to high-profile corruption scandals due to the large number of major infrastructure projects that are financed by multilateral development banks, as well as the requirement for compliance systems for companies to receive loans from those banks. [10] Discuss and provide examples of how ISO 37001 has been implemented in Latin America, including examples of issues arising from resource constraints on small and medium-sized businesses, and fragmented regulatory advice across jurisdictions for ISO 37001 and the cultural differences between countries that encourage the informal reporting of corrupt acts and the necessity of formal whistleblower channels [6].

Lizarzaburu and his research associates conducted experiments in Peru using an integrated risk/anti-bribery model employing ISO 31000/ISO 37001 and their operational risk matrices, which emphasize the strategic importance of risk-based thinking when dealing with anti-bribery issues on business sectors (i.e. Construction, Cement and Financial Services) [7]. The Research results from this project are indicative of how a Systems Approach to the Management of Risk can allow the transformation of Anti-Corruption Regulation from a theoretical framework to Operational Control and Responsibility Procedures for Organizations based on the ISO37001 framework. More recently, Peruvian Academic Researchers have been assessing ISO 37001 from the perspective of Public Sector Compliance, asserting that Anti-Bribery Management Systems can only result in a change in behaviour when they are integrated with Long-term Effectively and Predictably Sanctioned culture and practices, and Credible Leadership in all areas (including Government and Private Sector) [11].

Australia represents an entirely different configuration of experience than other countries. Australia has a long-established tradition of consistently being one of the top countries in terms of global governance indicators as measured by the World Bank, as evidenced by their many years of having over a 90th percentile control of corruption in the Worldwide Governance Indicators and strong enforcement of compliance with foreign bribery legislation. As a result, the Australian government has issued many foreign bribery law enforcement cases and conducted legislative inquiries into the corporate culture within companies operating in Australia. The findings of these inquiries have increased the Australian government's focus on Australian companies' compliance programs. The Australian Multinational Companies' Anti-Bribery Compliance Research Project [12] analysed the anti-bribery compliance programs of Australian multinational companies. The results of the study indicated that the success of these programs was determined by the interaction of both the global corporate compliance rating system and the cultural expectation of Australian employees. This included various cultural elements such as gift giving, providing hospitality to clients, and employee relationship building practices. As a result of the study's findings, it is evident that compliance programs established at the headquarters may struggle to be successful in Australia if those programs do not introduce local business customs and practices and do not establish culturally appropriate guidelines for the Australian workforce.

A far-reaching literature regarding information technologies and communication technologies, transparency as well as open government all demonstrates the requirement for external mechanisms to support anti-bribery systems. Research demonstrates how digital platforms (e.g. social media), open data (i.e. data made available to the public), and other online tools allow for improved citizen engagement and improved oversight of organizations when these tools are combined with the establishment of proper judicial mechanisms/means of accessing justice [13]. Examples of this in action include: In Peru, the creation of transparency portals; the establishment of open contracting websites; and improved investigative journalism have aided the detection of various forms of corruption, thus creating pressure upon organizations to create a more sophisticated forms of compliance, particularly where the formal institutions are weak [8], [9].

Finally, an emerging line of research connects global Countries with low control of corruption scores frequently utilize ISO 37001 as part of a comprehensive strategy for enhancing their reputation and investment climate. The ISO 37001 certification can serve dual functions; as an internal governance instrument and to demonstrate to investors, lenders, and other stakeholders that the country has in place credible protective measures [5],[14]. Accordingly, the ISO 37001 serves as one way for some Countries with low Corruption Perception Index scores to communicate to potential investors their commitment to promoting sound and ethical business practices. In this regard, it is interesting to compare the cases of Peru and Australia. Peru currently has a low score on the Corruption Perceptions Index, coupled with high levels of public distrust, yet, it is positioning itself to be an early adopter of ISO 37001 in South America; whereas, Australia is a well-established country with high governance scores and adopts a much more selective and risk-based approach to the adoption of ISO 37001, particularly in industries that are subject to cross border enforcement. In addition, by examining the origin and development of ISO 37001 and the differences between Peru and Australia, this article will provide greater insight into the factors that facilitate or impede the implementation of ISO 37001 in different cultural environments; and offer suggestions as to how the experiences of both Countries, and their approaches to implementing ISO 37001, can inform each other as they develop the necessary processes to convert ISO 37001 from a formal standard to an integral part of their governance systems.

III. Methodology

Since this study does not rely on primary data, it should be understood as an interpretative comparative analysis of the use of ISO 37001 within two different countries (Peru and Australia), through document analysis, secondary quantitative data and analytical generalization. The primary goal of this study is to obtain a better understanding of how the institutional environment, traditional governance approach, and organizational culture influences the way that ISO 37001 is implemented in both countries and the potential for cross-learning, not to assess the effectiveness of every anti-bribery control for each country but rather, claims are presented as analytically grounded interpretations and propositions, not as direct measurements of behaviour within specific organizations in Peru or Australia.

A systematic literature review was carried out for both anti-bribery management system documentation and all anti-bribery management system-based laws in both countries. The search was concentrated on only the most recently published sources (since 2018), which included material listed in established databases such as Scopus and Web of Science. Key search terms included "ISO 37001", "anti-bribery management systems", "Peru's compliance", "Australia's enforcement of bribery laws", and "risk management standards". Many important papers published before 2018 were included in the review if they were relevant to ongoing discussions or provided essential knowledge and context needed for future improvements [1], [2], [13], [15].

The authors' approach to the study is also aligned with their current data set of ISO-based risk and compliance frameworks, which is based on a review of Latin American case studies regarding integrated risk and anti-bribery systems [6], [7], theoretical and empirical investigations of anti-bribery management systems from various jurisdictions [5], [10], [14].

In addition, the authors' current approaches include efforts to research standardization of both compliance management and the auditing of compliance processes, in relation to ISO 37301 and ISO 37001 [3], [4]. Australian focused literature examining international compliance and dosing of bribery risks adds to this body of research [12].

The third step selected indicators of governance and corruption indices to provide insight into the context of Peru and Australia. The analysis focused on two groups of key governance/corruption indicators: The World Bank's Worldwide Governance Indicators, specifically, the Control of Corruption Dimension, which provides Percentile Rankings for both countries' relative positions within the Global Distribution of corruption and Transparency International's Corruption Perceptions Index, with scores ranging from 0 – 100 based on surveys of Experts and Business Leaders [9]. The reason for using both these indicators was because both are consistently used as empirical measures for assessing Governance and Corruption; are based upon openly available methods of collection; and were established prior to the start of the current research so that it can accurately reflect up-to-date trends.

The research compiled a limited comparative dataset using the most recent data as of the time of this study that included the Control of Corruption Percentile Ranks and CPI Scores for both countries, Peru and Australia. The Peru Government Governance Data Set reports that in 2023, Peru had approximately 25 percentiles in their controls of corruption whereas Australia had 96%. The large difference between these two countries demonstrates that there was a significant difference in how these two countries perceive their ability to control corruption. Further, Peru scored 31 out of 100 on the CPI for 2024 and received a rank of 127 out of 180 countries, whereas Australia received a score of 77 and ranked in the upper echelon of countries globally in terms of perceived corruption performance [9]. All numbers above were tabulated and a basic comparative graph was created from this information, which could be duplicated using statistical software or Word Processing programs.

The comparison is organized around four dimensions that reveal the changing function of ISO 37001 across institutional contexts, so it reveals the role of ISO 37001 as a travelling governance standard that performs different institutional functions depending on the context. . These themes were from both the literature reviewed and the policy documents related to both cases including the OECD Economic Survey of Peru and Peru's National Integrity Strategy [8], [11]. The study seeks to provide a multidimensional analysis of the similarities and differences between the two cases. By triangulating multiple methods and sources, we believe this study will provide an in-depth yet rigorous comparison, which will benefit both academics and practitioners in this field.

IV. Results and Discussion

A. *Governance context and corruption risk profile*

Peru's and Australia's governance environments have very different characteristics; these elements have a significant impact on how ISO 37001 is interpreted and implemented. The World Bank's control of corruption indicator tracks Australia's position in terms of control of corruption at nearly ninety-six percent globally (2023), making Australia among the few nations to have perceived good governance relative to other nations worldwide. In contrast, Peru is rated just over one-quarter (25%) of the world's nations, meaning that approximately three-quarters (75%) of all nations are perceived to have better governance and a higher degree of effective control over corruption. A similar gap exists between the two countries when considering their respective scores on the Corruption Perceptions Index (CPI); Australia's most recent 2024 CPI score is 77 out of 100, while Peru scored 31 points, placed 127th overall out of 180 nations surveyed [9].

According to this evidence, Australia's institutions represent a higher level of determent towards bribery and a higher level of support for whistleblowers than those in Peru, however, some sectors, especially political finance in Australia have been exposed by both media and government inquiries to be vulnerable due to poor governance. The poor performance scores in regard to the political finance systems of Peru can be attributed to the country's history of grand corruption, the practice of the revolving door, and the numerous times that corrupt state representatives and agencies have captured and exploited state agencies, resulting in distrust between citizens and government institutions as well as a very complicated environment for the development of compliance reform efforts [8],[11].To visualize these contrasts, Table 1 summarizes key governance indicators for both countries.

TABLE I
GOVERNANCE INDICATORS FOR PERU AND AUSTRALIA (LATEST AVAILABLE VALUES)

Country	Indicator	Year	Value	Source and notes
Peru	Control of corruption percentile rank	2023	25.47	World Bank Worldwide Governance Indicators, control of corruption percentile rank
Australia	Control of corruption percentile rank	2023	95.75	World Bank Worldwide Governance Indicators, control of corruption percentile rank
Peru	Corruption Perceptions Index score	2024	31	Transparency International, Corruption Perceptions Index 2024 country data
Australia	Corruption Perceptions Index score	2024	77	Transparency International, Corruption Perceptions Index 2024 and national reporting

The comparative insight is that governance context shapes what adoption is expected to accomplish not whether ISO 37001 is adopted since both countries did; it. In Peru, adoption is closely tied to legitimacy-building under conditions of institutional distrust, whereas in Australia it is more closely tied to assurance within an already developed governance environment.

B. *ISO* 37001 as a management system and its integration with risk frameworks

ISO 37001 is interpreted in both nations the same way under the currently established frameworks for risk and compliance. It is required by ISO 37001 for any organization to take a risk-based approach when implementing this standard; currently all organizations are required to establish governance and internal controls within their organization and to monitor their own business performance. Organizations in both countries differ greatly in how well they have integrated the above requirements from ISO 37001 into their overall business management system.

The relationship between ISO 37001 and ISO 31000, as well as other already-established risk categories identified in current operational risk matrix frameworks used by both financial and non-financial institutions around the world [7], was also highlighted by research conducted on risk and anti-bribery management in Peru. This perspective facilitates the integration of these systems within an overall strategic plan, thus providing a means for businesses to assign accountability within their organization; identify the level of risk they are willing to accept; and allocate resources based on existing practices and strategies. Additionally, given that many companies operating in sectors such as construction and mining face additional compliance obligations – including those associated with workplace safety, environmental stewardship and community engagement – the introduction of ISO 37001 allows companies to enhance their understanding of how integrated management systems can incorporate aspects of integrity and anti-bribery policies directly into their operations and strategies.

Research on the application of anti-bribery standards across Latin America has illustrated that organizations that implement the provisions of ISO 37001 within a coherent management system are likely to experience greater cultural transformation than organizations that use the ISO 37001 certification as a stand-alone exercise [6], [11]. When risk assessments, due diligence processes and training are coordinated with the organization's strategic objectives, employees can more easily integrate anti-bribery standards into their daily behaviors, believing them to be legitimate rather than externally imposed. As demonstrated by companies that have combined ISO 37001 and enterprise risk management, companies can document incidents in a more systematic fashion, investigate their root causes, and disseminate the lessons learned to all parts of the company. These activities contribute to the overall organization's capability to prevent incidents from occurring [7].

The Australian business sector typically implements ISO 37001 in combination with pre-existing corporate governance structures which have been established through Australian corporate law as well as the stock exchange listing requirements and several industry-specific compliance guides. In addition, most Australian mining, energy and financial services organizations already have an advanced level of compliance program development in place through established compliance teams that report directly to the organizations' board of directors and/or audit and risk committee members. Therefore, in these types of organizations, ISO 37001 is not designed to be a completely new compliance system. Instead, it is used to review current anti-corruption practices found within a firm's compliance program against the ISO 37001 standard and to identify areas where additional measures must be implemented to comply with the standard. In addition, ISO 37001 can serve as an important communication tool for multinationals to communicate to their regulators, clients and foreign subsidiaries on how they are implementing anti-corruption best practices that meet international standards set forth by ISO.

The comparison therefore shows two different pathways of integration: in Peru, ISO 37001 may help create or formalize integrated risk and compliance systems; in Australia, it tends to refine, benchmark, or harmonize systems that already exist.The way in which ISO 37001 will affect each jurisdiction will depend on how well the standard is incorporated into the overall governance framework of each jurisdiction, rather than simply how many certificates are held by a number of organizations.

C. *Cultural adaptation, organizational behavior, and stakeholder expectations*

The literature on ISO 37001 consists of many examples supporting the assertion that for formal controls to be successful, they must support both the culture of the organization and the cultures (social norms) in which they operate [3], [5]. In Peru, there is a strong presence of informal practices that exist alongside formal bureaucratic procedures, particularly through personal relationships and clientelism. According to surveys, most citizens perceive most politicians to be corrupt and that informal payments continue to be very common in obtaining access to services [8], [9]. Given this context, the reviewed literature suggests that organizations must tackle two challenges: they must resist external pressures to "conduct business as usual," and at the same time, they need to change their internal norms that may be condoning the acceptance of small favors or facilitation payments through the establishment of ISO 37001 controls.

Studies support that managing anti-bribery effectively requires a sustained commitment to creating a "culture of risk and ethics" in which employees and managers alike recognize bribery as an illegal act of both strategic and reputational destruction for both companies and individuals. Author[6] found that even when companies establish anti-bribery programs, patterns continue to exist in the form of areas which have not been filled in, and most linked with third-party due diligence procedures, as well as conflict of interest management and whistle-blower protections. In many cases, these patterns exist due to the discomfort with formally denouncing others as well as a hierarchical structure that discourages questioning those above you. The methodologies of training recommended here would encourage a process of reflection about the everyday ethical dilemmas and would link the requirements of the organization to the practical realities of their experience in procurement, sales, and project management.

The Australian cultural environment is also full of complications and is not exempt from tension; [12] found this to be the case with their data. Employees of Australian companies frequently find themselves caught in the grey area between the relationship-building aspect of hospitality and the possibility of illegal bribery, particularly when their companies operate across national and cultural boundaries. For example, some events, such as sponsoring a conference or inviting a client to a sporting event, may be seen as acceptable in one culture but may raise questions regarding their propriety in another. To address these situations successfully, compliance programs must provide employees with greater detail and clarification regarding their obligations under the law than simply stating a generic slogan or providing one-sentence definitions of business conduct. Additionally, while [16] state that Australian companies are currently debating the role of money in politics and lobbying, they also have come under pressure to ensure alignment between external corporate political advocacy and internal codes of conduct.

Evidence from other studies concerning anti-bribery management systems supports the conclusion presented above that the tone set by top management, the commitment shown by middle management, and the existence of whistleblowing opportunities for employees to report, ask questions, or raise concerns without being subjected to retaliation are essential elements of an effective anti-bribery management system [5] [10] [14]. In Peru, where there is a high level of fear regarding retaliation and a low level of trust in institutions, the establishment and operation of whistleblowing channels and investigation procedures are particularly sensitive issues. In Australia, there is a greater degree of trust in the use of formal channels; however, employees may still express concern about the potential for negative career impacts or becoming isolated from others in the workplace because of reporting misconduct. The Standards for Anti-Bribery Management Systems (ISO 37001) provide a framework for creating anti-Bribery management systems, and prior studies indicate that the overall effectiveness of the anti-bribery management system depends on how well the system is effectively communicated, adequately resourced, and integrated into the daily business practices of the companies. Contrasting the two countries, Peru highlights the challenge of moving from informal relational practices toward formal reporting and accountability, while Australia highlights the challenge of clarifying boundaries in sophisticated compliance environments, pointing to cultural adaptation being a central mechanism through which the standard becomes meaningful in practice

D. *Certification dynamics, enforcement, and reputational signaling*

The link between ISO 37001 certification, enforcement action, and reputation is also an area where both Australian and Peruvian experiences have shown a similar pattern. In high-governed countries like Australia, regulation and enforcement agencies rely heavily upon legal tools such as foreign bribery laws, corporate criminal responsibility provisions, and sentencing guidelines. Thus, in this environment where the number of regulations is high, ISO 37001 is widely used by organizations to provide evidence of adequate procedures in place which will potentially influence prosecutorial discretion or penalty assessment when they are faced with the legal system [12]. However, certification does not guarantee the absence of enforcement, and caution is exercised by regulators in treating certification as a safe harbor.

In Peru, on the other hand, ISO 37001 is being actively promoted by several government ministries, regulatory bodies, business organizations and other stakeholders as part of a national integrity agenda following the recent outbreak of serious corruption cases within the country. Reports published on the issues surrounding compliance within the Public Sector and the need to establish a National Integrity Strategy indicate that Public Sector organizations – particularly those that are involved in the execution of major infrastructure projects – need to have a formalized and structured approach to the identification, mitigation and management of bribery and corruption risk [11]. The Peruvian Government has also been awarded certification for its compliance with ISO 37001 in some of its public sector agencies, which is being used as an illustration of their commitment to promoting integrity and transparency within the country. There is thus a dual purpose for which certification can be sought; in some cases, to achieve tangible benefits and in others as a symbolic statement.

Research conducted in Latin America has highlighted the likelihood of cosmetic compliance occurring when certification is predominately based on reputation. Evidence suggests that when companies are concerned more with maintaining a positive public image through certifying bodies, they create documentation for the auditors to review but do not materially change their internal behavior [11]. Furthermore, [7] warned that this type of superficial certification could be harmful, by creating an illusion of compliance and increasing cynicism about the compliance efforts among employees who notice that there is a significant disparity between what is stated publicly, and what happens on a day-to-day basis in the workplace. Conversely, study [6] demonstrated that effective application of anti-bribery standards will identify inconsistencies in the procurement process, rationalize the company's control systems, and facilitate communication between compliance officers, internal auditors and operational managers.

The ISO 37001 Standard has three functions as demonstrated through a comparative analysis. The first function of the ISO 37001 Standard is to serve as an internal governance blueprint by defining the roles, processes, and controls needed to establish an anti-corruption management system within an organization. The second function is that it allows organizations to demonstrate to their stakeholders that the organization has a framework of anti-corruption safeguards that are recognized internationally by use of the Standard. The third function is to act as a bridge between enforcement and self-regulation as

Regulators and Prosecutors will use the evidence of a Management System that an organization has established when they are making their decisions. These roles are weighted differently by country, with Australia placing more weight on the enforcement-oriented functions whilst currently in Peru the signalling and capacity building functions dominate. With the increased ability of enforcement and the establishment of legal precedents regarding the Corporate Responsibility of companies, the use of ISO 37001 in Peru will likely evolve toward a more balanced configuration.In Peru, it is strongly associated with reputation, capacity building, and public trust; while in Australia, it is closely linked to evidence of adequate procedures, board oversight, and regulatory expectation. Comparison shows that certification has different dominant meanings across these contexts

E. *Cross learning opportunities between Peru and Australia*

Both Australia and Peru have unique practices related to ISO 37001, and both countries could ultimately benefit from each other's experiences in implementing ISO 37001. From an Australian perspective, a significant lesson that Peru could learn from Australia is how to integrate anti-bribery programs into the broader governance system that includes independent regulators, civil society, and investigative media; these entities are effective at implementing external checks and balances [11] on the activities of companies and individuals. In addition, the Australian experience demonstrates that having clear guidance available to boards of directors, regular reporting to the audit and risk committee and the inclusion of anti-bribery disclosures into environmental social and governance (ESG) disclosures are beneficial practices [12]. These practices will assist companies in Peru that are often operating in high-risk environments, where there are numerous interactions between public and private sectors, strengthen their credibility with compliance efforts, and provide opportunities for obtaining responsible investment funds.

The experiences of Peru with regard to the application of ISO 37001 and other similar standards in their fight against bribery provide an opportunity for Australian business to learn from the lessons of Peru, not just as a means to protect corporate reputation but also as a way to restore social trust in industries such as mining, which have suffered from a loss of legitimacy due to the negative impacts of corruption. An important aspect of both Peruvian scholarship and practice is the connection between anti bribery management, good relations with communities where the mining operations exist, and the implementation of inclusive and participatory governance systems that empower communities and enable them to benefit from their natural resources [7][8]. This way of thinking about anti bribery systems is consistent with the ongoing discussions concerning the principles of corporate social responsibility and social license to operate, which advocate that anti bribery systems should (in addition to protecting corporate reputation) be clearly connected to corporate commitment both to respecting human rights and to being environmentally responsible and to ensuring (to the extent practical) that local communities are able to achieve real and sustainable benefits based on their natural resources [5]. This perspective can be particularly valuable for Australian mining companies operating in Aboriginal territories in Australia as well as in jurisdictions that lack the institutional capacity to support Australian mining companies abroad. The Peruvian example of community focused compliance will help Australian companies make better, more responsible decisions and contribute to restoring social trust in the mining industry.

The benefit of access to learning across different industries towards providing training and developing skills is seen in the design of the training and capacity building methods offered by Peru. Peruvian practitioners have created the methodology to provide small and medium sized businesses and local officials with narratives of ISO language to make it easier to comprehend [7], [11]. In contrast, Australian businesses have gained extensive experience in providing businesses with tailored approaches to implementing anti-bribery policies. Australian companies have used the experiences they have learned within the development of their businesses, as well as working with a variety of cultures throughout Asia and the Pacific regions, to develop their method and provide information to other countries like Peru, who are entering into the global marketplace and are dealing with the implementing of new regulations around the globe.

Considering all these pieces of evidence, it is apparent that ISO 37001 cannot be treated as a simple technical manual to implement the same way regardless of geographical location or country. Instead, it represents a flexible system of management that must be molded to suit local culture and environment where ISO 37001 is being used to provide favorable outcomes. The findings are particularly relevant for engineering project environments, where ISO 37001 is often applied in practice because infrastructure, construction, mining, energy, and public works projects involve complex procurement chains, contractor–subcontractor relationships, public permits, technical supervision, and high-value project decisions.ves

V. Conclusions

The paper has examined the application of ISO37001, an anti-bribery management system standard, through two disparate cultural and governmental systems: Peru and Australia. It has done so by reviewing contemporary academic literature and providing a comparative analysis of indicators associated with governance and contextualized debate within the context of each country, to go beyond a simplistic overview of ISO-37001's clauses and to illustrate the different realities that exist in both countries in regard to the way they are implemented.

The findings above show that the institutional environment of a country is important. The comparison between Peru and Australia reveals that the same standard can operate as a capacity-building and legitimacy-signaling tool in one context, while functioning as an assurance, harmonization, and enforcement-support mechanism in another. This comparative finding could not be fully derived from either country case in isolation. In the case of Australia, ISO 37001 primarily contributes to the alignment of current practices, the establishment of a common language among national and multinational entities, and the provision of proof of adequate procedures or systems to courts or regulators. On the other hand, in Peru ISO 37001 operates in an uncertain environment in Peru. In this case, ISO 37001 assists companies by building their capacity as well as providing a signal to the public regarding the company's commitment to integrity. The comparison also suggests that cross-learning should be understood as bidirectional. Peru can draw from the Australian experience in board-level oversight, enforcement credibility, integration with enterprise risk management, and the use of compliance evidence in regulatory contexts. Australia, in turn, can learn from the Peruvian experience of applying anti-bribery systems in high-risk project environments where community trust, social license to operate, and legitimacy restoration are central governance concerns. This is particularly relevant for infrastructure, construction, mining, energy, and public procurement projects, where bribery risk can affect not only legal compliance but also cost control, supplier selection, quality assurance, safety performance, stakeholder trust, and project delivery.

Also the analysis suggests that, in both nations, it is necessary to integrate ISO 37001 into broader governance and risk management systems. and that the he cultural and behavioral aspects of the issue are as important as formal policies, procedures, and documentation ISO 37001, as a set of guidelines, provides assistance in these areas; however, the degree to which an organization will adhere to them is directly linked to their willingness to face uncomfortable truths about their own respective cultures.

Analysis shows that ISO 37001 serves several functions at once, depending on context, as an internal governance model, an external communication tool and a possible link between self-regulation and enforcement. The balance of these functions varies in these countries and by sector. Consequently, regulators and policy makers must promote the standard in conjunction with ongoing development of investigative and judicial capacity, so that organizations and individuals do not view their certification as protection from scrutiny but rather as a launching point for more thorough examinations of their operations. For organizations interested in obtaining certification, this indicates that obtaining certification without taking the time and effort to properly implement the system may be detrimental to their credibility when a scandal occurs.

Finally, the ability for cross-learning between Australia and Peru highlights another way that all countries stand to benefit from comparative research around management standards. Australia can provide Peru with examples from its own experience in the areas of consolidated enforcement, board level oversight and integration of anti-bribery systems as part of a well-developed set of governance, risk and compliance frameworks while allowing Peru to create examples for others working with ISO 37001 through its unique experiences in community engagement, social license to operate, and rebuilding trust in contested sectors. This research has implications for multinational organizations with operations in both jurisdictions to build an anti-bribery program that recognizes the realities of operating in both countries and adheres to the same global best practices.

The limitations of this study are due to its methodology being based on secondary sources, governance indicators, and published case-based evidence, and does not directly measure the behavior, perceptions, or internal decision-making processes of employees, managers, compliance officers, or public officials in Peru or Australia. Future studies could extend on this work by performing fieldwork within companies who have received ISO 37001 certification across countries and determining how staff views the system, how investigations are performed and how incidents are used to inform future risk analysis and employee training. An appropriate mixed method design that includes survey, interview and process tracing methods will be very advantageous in this area. Based upon the reviewed evidence, the authors conclude that ISO 37001 has potential value as a living governance framework compared to being viewed merely as a static checklist; it can help companies achieve ethical behavior, increase resilience and create socially responsible organizations in either high or low regulatory environments.

REFERENCES

[1] D. Gould y J. A. Amaro-Reyes, *The effects of corruption on administrative performance: illustrations from developing countries*. en World Bank staff working papers Management and development series, no. 7 = 580 [d. Gesamtw.]. Washington, D.C: World Bank, 1983.

[2] P. M. Nichols, "The Business Case for Complying with Bribery Laws", *Am. Bus. Law J.*, vol. 49, núm. 2, pp. 325–368, jun. 2012, doi: 10.1111/j.1744-1714.2012.01134.x.

[3] S. H. Björnsdottir, P. Jensson, S. E. Thorsteinsson, I. M. Dokas, y R. J. De Boer, "Benchmarking ISO Risk Management Systems to Assess Efficacy and Help Identify Hidden Organizational Risk", *Sustainability*, vol. 14, núm. 9, p. 4937, abr. 2022, doi: 10.3390/su14094937.

[4] P. Malega y M. Majerník, "Standardisation of Compliance Management and Process Quality in the Organization Based on the Integrated Management System", *Qual. Innov. Prosper.*, vol. 28, núm. 3, pp. 82–99, nov. 2024, doi: 10.12776/qip.v28i3.2071.

[5] L. Veselovská, J. Závadský, y Z. Závadská, "Mitigating bribery risks to strengthen the corporate social responsibility in accordance with the ISO 37001", *Corp. Soc. Responsib. Environ. Manag.*, vol. 27, núm. 4, pp. 1972–1988, jul. 2020, doi: 10.1002/csr.1909.

[6] S. A. Monroy Estupiñan, L. S. Pineda Lozano, G. Peña Guarín, y E. Lizarzaburu Bolaños, "Gestión antisoborno: evaluación en una economía Latinoamericana con base en la norma técnica NTCISO 37001:2017", *SIGNOS - Investig. En Sist. Gest.*, vol. 14, núm. 1, ene. 2022, doi: 10.15332/24631140.7473.

[7] Lizarzaburu, E., Chavez, M., Garcia , C., Noriega, E., & Tinoco, D. (2025). ISO 31000 guide: steps used in all types of organizations in Latin American countries. Multidisciplinary Reviews, 8(7), 2025212. https://doi.org/10.31893/multirev.2025212

[8] OECD, *OECD Economic Surveys: Peru 2023*, vol. 2023. en OECD Economic Surveys, vol. 2023. OECD Publishing, 2023. doi: 10.1787/081e0906-en.

[9] Transparency International, Ed., *Corruption Perceptions Index 2024*. Berlin: Transparency International, 2025.

[10] L. Veselovská, “Role of anti-bribery management system in sustainable development of entrepreneurship and public policy: a qualitative study”, *Future Bus. J.*, vol. 11, núm. 1, p. 156, jul. 2025, doi: 10.1186/s43093-025-00581-z.

[11] T. Pereyra Villar, “El public compliance en el Perú. Estado de la cuestión y desafíos hacia la construcción de una agencia Anticorrupción”, *Giuristi Rev. Derecho Corp.*, vol. 5, núm. 10, pp. 71–92, dic. 2024, doi: 10.46631/Giuristi.2024.v5n10.05.

[12] F. M. J. Teichmann, “Anti-bribery compliance incentives”, *J. Financ. Crime*, vol. 25, núm. 4, pp. 1105–1110, oct. 2018, doi: 10.1108/JFC-09-2017-0081.

[13] J. C. Bertot, P. T. Jaeger, y J. M. Grimes, “Using ICTs to create a culture of transparency: E-government and social media as openness and anti-corruption tools for societies”, *Gov. Inf. Q.*, vol. 27, núm. 3, pp. 264–271, jul. 2010, doi: 10.1016/j.giq.2010.03.001.

[14] G. Owusu y P. Klotz, “A comparative analysis of the current anti-bribery practices and ISO 37001 requirements in Ghana”, *Gradus*, vol. 11, núm. 1, 2024, doi: 10.47833/2024.1.ART.001.

[15] Z. Rezaee y R. A. Riley, *Financial statement fraud: prevention and detection*, 2nd ed. en Finance professional collection. Hoboken, N.J: Wiley, 2010. doi: 10.1002/9781119198307.

[16] P. Latimer, “Anti-bribery laws – compliance issues in Australia”, *J. Financ. Crime*, vol. 24, núm. 1, pp. 4–16, ene. 2017, doi: 10.1108/JFC-03-2016-0015.