



REPUBLIC OF SERBIA

REPUBLIC GEODETIC AUTHORITY (RGA)

TERMS OF REFERENCE

FOR

ANTI-BRIBERY MANAGEMENT SYSTEM (ABMS)

Belgrade, January 2024

I. INTRODUCTION AND BACKGROUND

The Republic of Serbia and the International Bank for Reconstruction and Development (Hereinafter: IBRD) concluded the Loan Agreement (Hereinafter: LA) for the Real Estate Management Project in Serbia (Hereinafter: The Project), signed by the two parties on April 17th, 2015, and ratified by the Parliament of the Republic of Serbia in its session on Jun 24, 2015 (Official Gazette of the Republic of Serbia – International contracts, No. 13-15).

The Law on State Surveys and Cadaster (LSSC, 2009) with appropriate amendments provides a solid foundation for the project. A viable single agency, the Serbian Republic Geodetic Authority (RGA), is implementing the LSSC. A Project Council and Project Steering Committee are supervising the Project Implementation.

The Project consists of four components: (A) Valuation and Property Taxation; (B) E-governance for Enabling Access to Real Estate Information; (C) Institutional Development of the RGA; and (D) Project Management and Support Activities.

The objective of the Project is to improve the efficiency, transparency, accessibility and reliability of the Republic of Serbia's real property management systems.

A full description of the Project is provided in the document "Project Appraisal Document" (PAD) and Loan Agreement (LA). The PAD is considered as a part of the necessary background materials to be understood by Consultants¹.

Implementation is entrusted to the Project Implementation Unit (Hereinafter: PIU) of the Republic Geodetic Authority.

II. INSTITUTIONAL FRAMEWORK

RGA is a special budget-institution of the Republic of Serbia. With over 2,000 employees, it was established to perform professional state administration works pertaining to state survey, real estate cadastre, utilities cadastre, basic geodetic works, address register, topographic-mapping business, real estate valuation, geodetic-cadastral information system and National Spatial Data Infrastructure and geodetic works in engineering-technical fields.

Cadastral Services which include property rights registrations for businesses and individuals are the most important and visible services RGA provides.

The Sector for Real Estate Cadastre (REC) is the largest Sector within RGA. The REC Sector is organized territorially, with citizens' applications being processed and handled regionally. Regional real estate Cadastre offices possess 80% of the total staff members (with high education level), provide 90% of RGA services throughout the country, and generate 95% of the income of RGA. There are currently 170 local offices and RGA has a total of 2,198 staff. Annually, the offices receive 571,533 number of applications for registration of rights, 91,943 applications for issuing copies of cadastral maps, and 1,595,000 applications for property folio extracts. The headquarters of RGA, located in Belgrade, has 553 staff, and is divided into 6 sectors:

- Sector for Geodetic Works
- Sector for Professional and Inspection Supervision
- Sector for Real Estate Cadastre
- Sector for Digital Transformation
- Sector for Legal Affairs
- Sector for Development

Smaller internal units outside of sectors are as follows:

- Department for Finance and Control
- Geospatial Data Management Center
- Department of Archives
- HR Department

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<https://documents1.worldbank.org/curated/en/541411468182064197/pdf/PAD955-PAD-P147050-R2015-0041-1-Box385415B-OUO-9.pdf>

- Department for Internal Auditing

III. OBJECTIVE OF THE CONSULTANCY:

One of the main tasks of RGA is maintenance of all the real estate data. Currently RGA uses different systems to maintain the real estate data. RGA as critical infrastructure is the governmental body of systems, networks and assets that are so essential that their continued operation is required to ensure the security of the state, nation, its economy, and the public's health and safety. As RGA works to continue to meet customer and legal requirements for compliance, RGA as the critical infrastructure of the state during the previous year obtained and maintained multiple ISO Management System Standards implementation. At the beginning of 2023, the Republic Geodetic Institute launched an important standardization project and the introduction of the ISO management systems in its operations, in accordance with the following international and Serbian standards:

- ISO 9001 Quality management system (QMS)
- ISO/IEC 27001 Information security management system (ISMS)
- ISO/IEC 27701 Privacy information management system (PIMS)

In December 2023, the Republic Geodetic Authority successfully became the holder of the ISO certificate issued by one of the world's leading certification organizations, TÜV Austria, for three key ISO standards: ISO 9001, ISO/IEC 27001, and ISO/IEC 27701. This provided independent confirmation that RGA achieved the highest standards of quality management of the entire business, including real estate registration, as well as standards of information security and privacy of the information of its employees and citizens of Serbia.

The World Bank Group considers corruption a major challenge to its twin goals of ending extreme poverty by 2030 and boosting shared prosperity for the poorest 40 percent of people in developing countries². The World Bank Group recognizes that corruption comes in different forms. It might impact service delivery, such as when an official asks for bribes to perform routine services. Corruption might unfairly determine the winners of government contracts, with awards favoring friends, relatives, or business associates of government officials. Or it might come in the form of state capture, distorting how institutions work and who controls them, a form of corruption that is often the costliest in terms of overall economic impact. Each type of corruption is important and tackling all of them is critical to achieving progress and sustainable change.

Corruption is a global problem that requires global solutions. The World Bank Group has been working to mitigate the pernicious effects of corruption in its client countries for more than 20 years. When approaching anticorruption at the country level, it is important to put in place institutional systems and incentives to prevent corruption from occurring in the first place. Prevention also calls for credible deterrence, relying on accountability and enforcement mechanisms sufficiently strong to send a message to potential wrongdoers of the potential cost of their misconduct. This presents an opportunity to build a clean, accountable, and transparent government by introducing highest standards of integrity through plugging entry points that allow corruption to flourish. In Serbia, the Bank is helping build a participatory platform to convene stakeholders and identify and follow up on specific actions in order to improve transparency, integrity, and good governance to support inclusive growth.

Bribery is a widespread phenomenon. It raises serious social, moral, economic, and political concerns, undermines good governance, hinders development, and distorts competition. It erodes justice, undermines human rights and is an obstacle to the relief of poverty. It also increases the cost of doing business, introduces uncertainties into commercial transactions, increases the cost of goods and services, diminishes the quality of products and services, which can lead to loss of life and property, destroys trust in institutions and interferes with the fair and efficient operation of markets. Governments have made progress in addressing bribery through international agreements such as the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the United Nations Convention against Corruption and through their national laws. In most jurisdictions, it is an offence for individuals to engage in bribery and there is a growing trend to make organizations, as well as individuals, liable for bribery.

However, the law alone is not sufficient to solve this problem. Organizations as is the Serbian Republic Geodetic Authority have a responsibility to proactively contribute to combating bribery. This can be

² <https://www.worldbank.org/en/topic/governance/brief/combating-corruption>

achieved by an anti-bribery management system (ABMS in line with ISO 37001), which this document is intended to explain, and through leadership commitment to establishing a culture of integrity, transparency, openness, and compliance. The nature of an organization's culture is critical to the success or failure of an anti-bribery management system. A well-managed organization is expected to have a compliance policy supported by appropriate management systems to assist it in complying with its legal obligations and commitment to integrity. An anti-bribery policy is a component of an overall compliance policy. The anti-bribery policy and supporting management system helps an organization to avoid or mitigate the costs, risks, and damage of involvement in bribery, to promote trust and confidence in business dealings and to enhance its reputation.

Conformity of the Republic Geodetic Authority with international and Serbian standard ISO 37001 cannot provide assurance that no bribery has occurred or will occur in relation to the organization, as it is not possible to completely eliminate the risk of bribery. However, this ISO standard can help the organization implement reasonable and proportionate measures designed to prevent, detect, and respond to bribery.

The ABMS implemented in this way will conform to ISO's requirements for management system standard ISO 37001. These requirements include a high-level structure, identical core text, and common terms with core definitions, designed to benefit users implementing multiple ISO management system standards. Thus, ISO 37001 will be used in conjunction with other management system standards already implemented in the Republic Geodetic Authority (e.g. ISO 9001, ISO/IEC 27001, and ISO/IEC 27701).

ISO 37001 was developed by a Project Committee established by ISO in 2013. The committee comprised experts from the following participating and observing countries and liaison organizations:

- Participating countries (37): Australia, Austria, Brazil, Cameroon, Canada, China, Colombia, Croatia, Czech Republic, Denmark, Ecuador, Egypt, France, Germany, Guatemala, India, Iraq, Israel, Kenya, Lebanon, Malaysia, Mauritius, Mexico, Morocco, Nigeria, Norway, Pakistan, Saudi Arabia, **Serbia**, Singapore, Spain, Sweden, Switzerland, Tunisia, UK, USA, Zambia.
- Observing countries (22): Argentina, Armenia, Bulgaria, Chile, Cyprus, Cote d'Ivoire, Finland, Hong Kong, Hungary, Italy, Japan, Korea, Lithuania, Macau, Mongolia, Netherlands, New Zealand, Poland, Portugal, Russia, Thailand, Uruguay.
- Liaison organizations (8): ASIS, European Construction Industry Federation (FIEC), Independent International Organization for Certification (IIOC), International Federation of Consulting Engineers (FIDIC), Organization for Economic Co-operation and Development (OECD), Transparency International (TI), World Federation of Engineering Organizations (WFEO).
- Committee Secretariat and Chair: British Standards Institution (BSI).

From an organization's perspective, there are many potential adverse consequences if it gets involved in bribery, and which therefore justify the organization taking adequate steps to prevent bribery in relation to the organization's activities.

1. **Ethical factors:** From an international and national perspective, bribery is now widely regarded as unethical and unacceptable. It is one of the greatest obstacles to good government and the development of safe and adequate infrastructure. Funds which could be used for schools, roads, hospitals etc. are diverted by corrupt people for their private use. Safety and environmental procedures can be corruptly avoided, resulting in dangerous infrastructure, and living conditions. Ethical organizations which are unwilling to bribe lose work to unethical organizations, which is unfair to ethical organizations, and may provide lower quality and higher cost solutions.

2. **Legal risk:** The international and national legal environment is rapidly changing, reflecting the increasing desire of people worldwide to prevent bribery.

- Many international treaties have been signed during the last 20 years requiring member states to implement anti-bribery laws and procedures. The most internationally significant of these are the United Nations Convention against Corruption (2003) and the OECD Convention on Combating Bribery (1999).
- Most countries have changed their laws in accordance with treaty requirements. Bribery and other corruption offences are therefore crimes worldwide. All OECD countries have now made

it a crime for their nationals and organizations to bribe overseas. As a result, a person or organization may be liable for bribery both in the country where the bribery took place, and in the person or organization's home country.

- Individuals and organizations can be held liable for bribery under both criminal law and civil law. The type and extent of liability will depend on the laws of each country.
- Criminal laws can result in fines and imprisonment for individuals, and fines and debarment for organizations. Prosecution agencies in many countries are now starting to investigate and prosecute organizations and individuals for bribery. There have been many recent major cases. An organization may also incur criminal liability in several jurisdictions as result of new laws passed which make the organization responsible for bribes paid on its behalf or for its benefit by joint venture partners, suppliers, contractors etc. It may be a defense or mitigate liability in some cases for the organization to show that it had implemented effective controls designed to prevent the relevant act of bribery.
- Civil laws can result in contracts being terminated in the event of bribery, and individuals and organizations being required to pay compensation to parties affected by the bribery.

3. **Safety and quality risk:** From an organization's perspective, bribery can adversely impact on its safety and quality management. A bribe paid by the organization's sub-contractor to the organization's site supervisor to overlook poor safety management on site can result in death or personal injury. A bribe paid by a supplier to the organization's procurement manager can result in the organization buying poor quality products which need repair or replacing. Therefore, effective safety and quality management also requires effective anti-bribery controls.

4. **Financial risk:** Involvement in bribery can result in financial risk to the organization:

- Fines levied by prosecutors or regulators.
- Compensation paid to other parties affected by the bribery.
- The internal management costs and external legal costs of investigating and dealing with bribery and any consequent legal actions.
- The costs of dealing with claims for death or personal injury resulting from bribery.
- The costs of purchasing products which are over-expensive due to bribery, or of rectifying defective products.

5. **Reputational risk:** Involvement in bribery can result in reputational risk for an organization and its employees. The press frequently carries articles on individuals and organizations implicated in or being prosecuted for bribery. An individual implicated in bribery may be unable to obtain employment. Customers may be unwilling to do business with an organization implicated in bribery. Ethical employees may be unwilling to work for an organization which is believed to be unethical.

IV. SCOPE OF WORK

What does "management system" mean?

A management system is a set of policies and procedures which can be implemented by the organization to help it control a specific risk or to help produce a specific outcome. An organization cannot for example achieve a safe working environment, or good quality products, simply by requiring this to happen. It has to implement a series of policies and procedures which are designed to achieve this outcome. On a similar basis, bribery prevention is increasingly being seen as a management issue (i.e. something which the organization needs to control through good management practices).

The Consultant will closely cooperate with RGA and relevant stakeholders in implementing ISO 37001 international and Serbian standard and use it in conjunction with other management system standards already implemented in the Republic Geodetic Authority (e.g. ISO 9001, ISO/IEC 27001, and ISO/IEC 27701) within unique Integrated Management System (IMS). Selected Consultant shall provide input and support to RGA as ISO 37001 requires the organization to implement, in a reasonable and proportionate manner, a series of measures which are designed to help the organization prevent, detect, and deal with bribery. The following summarizes the key measures:

1. Ensure that the organization's top management has overall responsibility for the implementation and effectiveness of the anti-bribery policy and ABMS and provides the appropriate commitment and leadership in this regard.
2. Establish and implement an anti-bribery policy and supporting anti-bribery procedures (the ABMS).
3. Ensure that responsibilities for ensuring compliance with the anti-bribery policy and ABMS are effectively allocated and communicated throughout the organization. For example:
 - Department heads will be responsible for compliance within their departments
 - All personnel will be responsible for their personal compliance.
4. Appoint an Anti-bribery manager and Implementation Team with responsibility for overseeing anti-bribery compliance by the organization (compliance function). This person(s) should be part-time, considering the size and organization of the RGA, and can combine this responsibility with other responsibilities.
5. Ensure that controls are in place over the making of decisions in relation to more than low bribery risk transactions. The decision process and the level of authority of the decision-maker(s) must be appropriate to the level of bribery risk and be free of actual or potential conflicts of interest.
6. Ensure that resources (personnel, equipment and financial) are made available as necessary for the effective implementation of the ABMS.
7. Implement appropriate vetting and controls over the organization's personnel designed to ensure that they are competent and will comply with the anti-bribery policy and ABMS and can be disciplined if they do not comply.
8. Provide appropriate anti-bribery training and/or guidance to personnel on the antibribery policy and ABMS.
9. Produce and retain appropriate documentation in relation to the design and implementation of the anti-bribery policy and ABMS.
10. Undertake bribery risk assessments and appropriate due diligence on transactions and business associates.
11. Implement appropriate financial controls to reduce bribery risk (e.g. two signatures on payments, restricting use of cash, etc.).
12. Implement appropriate procurement, commercial and other non-financial controls to reduce bribery risk (e.g. separation of functions, two signatures on work approvals, etc.).
13. Ensure that all other organizations over which it has control implement anti-bribery measures which are reasonable and proportionate to the nature and extent of bribery risks which the controlled organization faces.
14. Require, where it is practicable to do so, and would help mitigate the bribery risk, any business associate which poses more than a low bribery risk to the organization to implement anti-bribery controls which manage the relevant bribery risk.
15. Ensure, where practicable, that appropriate anti-bribery commitments are obtained from business associates which pose more than a low bribery risk to the organization.
16. Implement controls over gifts, hospitality, donations, and similar benefits to prevent them from being used for bribery purposes.
17. Ensure that the organization does not participate in, or withdraws from, any transaction where it cannot appropriately manage the bribery risk.
18. Implement reporting (whistleblowing) procedures which encourage and enable persons to report suspected bribery, or any violation of or weakness in the ABMS, to the compliance function or to appropriate personnel.
19. Implement procedures to investigate and deal appropriately with any suspected or actual bribery or violation of the ABMS. Launch ABMS and start to see changes come into action and use a plan to begin putting ABMS into action.

20. Monitor, measure and evaluate the effectiveness of the ABMS procedures.

21. Undertake internal audit at planned interval which assesses whether the ABMS conforms to the requirements of ISO 37001 and is being effectively implemented. After the documentation has been prepared and things have started being implemented, conduct internal audit to identify any problems within the scope of ABMS based on ISO 37001. Any corrective measures that need to be taken should be taken without any delays. If needed, documentation should be revised. Internal auditors will ensure that all procedures are well implemented, documented, and understood by the staff carrying them out. They will check that the system meets standard requirements, is effective, and is showing improvement,

22. Undertake Management review meeting by the compliance function and top management of the effectiveness of the ABMS. After internal audit conduct the management review of the progress that ABMS based on ISO 37001 is making. This review will help the team identify any underlying issues and the corrective actions that need to be taken to get everything in line with requirements. Management review is a useful tool that will give a precise look at the performance of ABMS and any problems that have come about.

23. Rectify any identified problem with the ABMS and improve the ABMS as necessary.

The next step but **not covered by this Project** will be assessment and registration by an independent Certification Body for certification of ABMS framework based on ISO 37001 standard. The time for RGA to carry on with the certification process will come and to officially become ISO 37001 certified.

The work of the Consultant to be performed to deliver an Anti-bribery Management System (ABMS) include **main objectives** as follows:

- Signifies a deep commitment to ethical behavior that helps an organization to function well, increase reputation and avoid potential bribery risks. Involvement in corruption can lead to reputational damage and loss of credentials. Therefore, Anti-bribery management is an essential component of an organization.
- Support the establishment of a worldwide culture that combats bribery and enhances trust and confidence in the business world, as well as in institutions. This is the reason; preventing bribery is becoming a global initiative, starting from individual awareness to organizations that have a responsibility to contribute to bribery prevention. This target can only be met through commitment, transparency, and compliance with the anti-bribery management system framework, which has been set forth in the ISO 37001 standard.
- Legal language defines the corruptive offense as deliberate action exhibiting signs of corruption, committed by a person on duty for which the law established criminal, administrative, civil, and disciplinary liability. Corruption may be impressed in different ways and even the UN Guide for Anti-Corruption Policies does not give a definition for the term “corruption”. But we can recognize it via different facts and events such as bribery, extortion, kickback, patronage, nepotism, theft, imposture, conflict of interest etc. The term “bribery” refers to any offering, giving, accepting, or promising advantages with any value or bribe in order to influence the decision, action or judgment of persons in charge of a duty.
- Sets requirements and provides guidance for the creation of a management system that helps to prevent, detect, and respond to bribery in compliance with anti-bribery laws. Although bribery may be a subset of or driver to corruption, it limits the level playing field while also creating leeway for corrupt individuals to divert corporate resources. Note that this standard will not be above any anti-bribery laws, but it is a good practical and tangible complement, and in the absence of any anti-bribery laws, this standard is good practice and an effective tool to prevent bribery.
- Establishment of a closed-loop control architecture that establishes, implements, maintains, reviews, and improves management strategies and objectives which address the specific requirements of ISO 37001 standard. This standard addresses management objectives for the prevention of bribery in these contexts:
 - Bribery in the public sector
 - Bribery by the organization

- Bribery by the organization's personnel acting on organization's behalf or for its benefit
- Bribery by the organization's business associates acting on the organization's behalf or for its benefit
- Bribery of the organization
- Bribery of the organization's personnel in relation to the organization's activities
- Bribery of the organization's businesses associates in relation to the organization's activities
- Direct and indirect bribery
- Implement the necessary measures designed to prevent, detect, and address bribery
- Promote trust and confidence for the shareholders, key stakeholders, and potential investors
- Avoid and/or minimize the cost, risk, and damage of involvement in bribery
- Mitigate risks and achieve reputational notoriety by implementing Anti-bribery Management System policies.

V. WORK PRODUCTS / DELIVERABLES

The products resulting from the work of the Consultant to be performed to deliver an Anti-bribery Management System (ABMS) include **main deliverables** as follows:

- Inception report including detailed work and action plan for the individual tasks to be completed.
- Detailed project plan, which includes the identification of individual phases of project implementation with related activities, with a description of the same, as well as a detailed time plan (Gantt chart).
- Documented information required by this standard (e.g., ISO 37001 System Manual, Anti-bribery and Anti-corruption Policy, Procedure for Bribery Risk Management, Procedure for Investigating and dealing with bribery, Procedure for document and data control, Procedure for training, Procedure for internal audit, Procedure for corrective action, Procedure for management review, Bribery Risk Assessment form, Skill requirements record, Multi skill requirements record, Document identification and codification system, Master list and distribution list of documents, Training report, Change note, Order form/confirmation, Master list of records, Customer complaint report, Objectives monitoring sheet, Indent and incoming inspection record, Audit plan/schedule, Approved external provider list and annual purchase order, Internal audit non-conformity report, External provider registration form, Bribery risk analysis sheet, Induction training report, etc.).
- Need and Expectations of stake holders which will be done in cooperation with responsible persons, and their verification will be done at meetings of the ABMS Implementation Team.
- Employee training carried out during the ABMS implementation process. The training, with the mentioned topics, hours spent and selection of employees, included:
 - Professional training and certification for ISO 37001 Foundation (3 days) with international ISO accreditation in accordance with the personal certification model according to the international standard ISO 17024 for a certain number of members of the implementation team – for three Implementation Team members;
 - Training and certificate of attendance for ISO 37001 Internal Auditor for a certain number of employees (2 days), and especially of the Implementation Team members, in order to become competent internal auditors;
 - General ISO 37001 training (1 day) for employees who have a significant impact on information security and protection of personal data.

- The methodology for establishing, implementing, maintaining, reviewing, and improving an anti-bribery management system in line with ISO 37001 standard in the RGA. When the establishing of documented information is completed, an ABMS Implementation Team should adopt and, after the Top management verification, release the documentation for implementation in accordance with the concept of ABMS implementation, and perform the necessary harmonization of ABMS implemented management system with the QMS, ISMS and PIMS, which includes the design of an integrated IMS.
- Established new roles and responsibilities where every area of RGA should have staff who are directly responsible for ABMS i.e., anti-bribery related tasks, maintenance, review and improving in each department that is capable of performing audits, maintaining documentation, conduct management reviews, and implement any needed changes.
- Internal audit prepared and conducted, which includes the initial process of verifying the established ABMS compliance in order to identify possible shortcomings and opportunities for improvement. Internal auditors will ensure that all procedures are well implemented, documented, and understood by the staff carrying them out. In order to prepare for certification according to the ISO 37001 standard, the Consultant, together with internal auditors from the RGA, conduct an internal audit before the certification process, and point out any non-compliance against ISO standard requirements.
- Conducted the management review of the progress that ABMS were making. This review will help the team identify any underlying issues and the corrective actions that need to be taken to get everything in line with requirements. Management review is a useful tool that will give a precise look at the performance of and any problems that have come about. The ABMS system implies the existence of a process of permanent improvement. By reviewing the results of the internal audit by the RGA's Top management, this process begins, and key decisions were made regarding the further certification process.

VI. CLIENT'S INPUT

RGA Sector for Development and Innovation should manage this activity, considering its competence and the tasks it performs on a daily basis. As ISO 37001 requires the organization to implement, in a reasonable and proportionate manner a series of measures which are designed to help the organization prevent, detect, and deal with bribery, appoint an Anti-bribery manager and Implementation Team with responsibility for overseeing anti-bribery and, considering the size and organization of the RGA, the participation of other key employees from other sectors is necessary, as well.

Coordination of the implementation of the ISO 37001 standard will be performed by the Assistant Director of the Sector for Development and Innovation.

The RGA shall provide Consultant with all the relevant documents required for Anti-bribery Management System (ABMS) implementation. RGA shall also provide office space for consultants at the RGA premises, assist in data collection and participate in working groups and training.

VII. PERIOD OF PERFORMANCE

The work will take place over four-months period:

Implementation of ABMS against ISO 37001

ABMS - 15 days after the contract signing: Ensure that the organization's top management has overall responsibility for the implementation and effectiveness of the anti-bribery policy and **ABMS** and provides the appropriate commitment and leadership in this regard

ABMS - 1 month after the contract signing: Plan everything out for Implementation and having a solid plan in place is essential to making the transition to a new ABMS against ISO 37001 standard. Decide on an Implementation team to begin implementation by Top management who should decide on and create an implementation team for ISO 37001. This team should be made up of managers from different areas of RGA business

ABMS - 45 days after the contract signing: Get everyone involved where every single person that works within RGA should be aware that change is coming with ISO 37001

ABMS - 2 months after the contract signing: Provide employee training, which is crucial to keeping ABMS running, and train all employees in the parts of the system that are specific to their area of work. Training should teach the employees about the procedures that apply to their work, which forms they should be using and how to complete and process them, how to find any specific ABMS documented information and how it relates to their position, how to report issues so that they can be fixed, where to find all relevant documents for conducting the internal audits.

Given that training is one of the key activities and considering the importance and role of employee training in the process of introducing ISO 37001 standard, attention should be paid to training.

Employee training should be carried out during the ABMS implementation process. The training, with the mentioned topics, hours spent and selection of employees, should include:

- Professional training and certification for ISO 37001 Foundation (3 days) with international ISO accreditation in accordance with the personal certification model according to the international standard ISO 17024 for a certain number of members of the implementation team - for three Implementation Team members;

- Training and certificate of attendance for ISO 37001 Internal Auditor for a certain number of employees (2 days), and especially of the Implementation Team members, in order to become competent internal auditors;

- General ISO 37001 training (1 day) for employees who have a significant impact on information security and protection of personal data.

ABMS - 75 days after the contract signing: Identify objectives and responsibilities, develop documented information such as policies, procedures, and instructions with following records within RGA as an integral part of keeping the business committed to meeting requirements of ISO 37001 standard i.e., in the field of anti-bribery.

ABMS - 3 months after the contract signing: Establish new roles and responsibilities where every area of RGA should have staff who are directly responsible for ABMS i.e., anti-bribery related tasks and maintenance in each department that is capable of performing audits, maintaining documentation, conduct management reviews, and implement any needed changes. Launch ISO 37001 and start to see changes come into action and use a plan to begin putting this standard into action. Monitor process performance and start internal audit to check that all standard requirements are being met

ABMS - 105 days after the contract signing: After the documentation has been prepared and things have started being implemented, conduct an Internal audit to identify any problems within the scope of ABMS. Any corrective measures that need to be taken should be taken without any delays. If needed, documentation should be revised. Internal auditors will ensure that all procedures are well implemented, documented, and understood by the staff carrying them out. They will check that the system meets standard requirements, is effective, and is showing improvement.

ABMS - 4 months after the contract signing: After Internal audit conduct the Management review of the progress that ABMS against ISO 37001 were making. This review will help the team identify any underlying issues and the corrective actions that need to be taken to get everything in line with requirements. Management review is a useful tool that will give a precise look at the performance of and any problems that have come about.

End of the Project

VIII. PROFESSIONAL QUALIFICATION FOR A CONSULTANT AND REQUIRED TEAM OF EXPERTS

A consultant company, as a part of their technical proposal, will submit the following information:

- a) Company Profile and experience highlighting its relevance to the assignment
- b) CVs of the members of the team of experts
- c) The consultant's comments or suggestions on the TORs and appreciation of the assignment – the objectives, tasks, and deliverables
- d) A timeline for carrying out the assignment.

A consultant company must have more than five years of extensive experience in the field of implementation of ISO standards: ISO 37001, ISO 9001, and ISO/IEC 27001.

A consultant company should have strong and relevant track record concerning the IT projects with public sector institutions, entailing oversight of implementation of software solutions, staff training and handover.

Partnership certificate or authorization, issued directly by an internationally accredited certification body in accordance with the personal certification model according to the international standard ISO 17024, for the services of conducting training of persons and their professional evaluation and certification, which must be issued to the legal entity of the bidder, and this will be considered as an advantage.

Person in the capacity as a Certified Trainer with a certificate issued by the accredited certification body from the previous item is an advantage.

A consultant company must have confirmed certifications for implemented and certified following ISO standards: ISO 9001, ISO/IEC 27001, and ISO/IEC 27701.

Experience in Western Balkans countries and Serbia will be considered as an advantage.

Team of Experts to be provided:

a. Expert 1: Project manager and ISO standards Lead Consultant, employed or engaged on a part-time basis within the company with eligibility criteria:

Qualifications and skills

- Education: University degree in the field of technical, organizational, or social sciences
- Strong oral and written English communication skills
- Good mediation and facilitation skills
- At least 7 years of work experience in the field of ISO standards

Specific professional experience

- Experience in project management related to public administration
- At least 7 years of work experience in the field of information technologies
- Working experience in Western Balkans and especially in Serbia is an advantage
- Passed professional Public Administration Exam is an advantage
- Certificate on PMI or Prince2 or ISO 21502 Lead Project Manager is an advantage
- Certificate on ISO/IEC 9001 Lead Auditor is an advantage
- Certificate on ISO/IEC 27001 Lead Auditor is an advantage
- Certificate on ISO/IEC 31000 Lead Risk Manager is an advantage
- Strong oral and written Serbian communication skills is an advantage

b. Expert 2: Senior ISO standards Consultant, employed or engaged on a part-time basis within the company with eligibility criteria:

Qualifications and skills

- Education: University degree in the field of technical, organizational, or social sciences
- Strong oral and written English communication skills
- Good mediation and facilitation skills
- At least 5 years of work experience in the field of ISO standards

Specific professional experience

- Experience in projects related to public administration
- At least 5 years of work experience in the field of information technologies
- Working experience in Western Balkans and especially in Serbia is an advantage
- Strong work experience in the court witness expertise or IT audits in the field of information technology is an advantage
- Certificate on ISO/IEC 9001 Lead Auditor is an advantage
- Certificate on ISO/IEC 27001 Lead Auditor is an advantage
- Certificate on ISO/IEC 37001 Lead Auditor is an advantage
- Strong oral and written Serbian communication skills is an advantage

c. Expert 3: Specialist for financial controls that manage bribery risk, employed, or engaged on a part-time basis within the company with eligibility criteria:

Qualifications and skills

- Education: University degree in the field of economics
- Strong oral and written English communication skills

- Good mediation and facilitation skills
- At least 5 years of work experience in the field of Accounting or Auditing

Specific professional experience

- Experience in using professional business process management tools (e.g. ISO 9001, FUK, etc.)
- At least 5 years of work experience in the field of financial management and control (FUK). FUK is a system of policies, procedures and activities that is established, maintained, and regularly updated by the head of the organization, and which, by managing risks, provides assurance to a reasonable extent that the goals of the organization will be achieved in a proper, economical, efficient, and effective manner
- Working experience in Western Balkans and especially in Serbia is an advantage
- Certificate on professional title Certified Auditor according to the Serbian Law on Accounting and Auditing is an advantage
- Certificate on ISO/IEC 37001 Lead Auditor is an advantage
- Strong oral and written Serbian communication skills is an advantage

d. Expert 4: Specialist for non-financial controls that manage bribery risk, employed, or engaged on a part-time basis within the company with eligibility criteria:

Qualifications and skills

- Education: University degree in the field of law sciences
- Strong oral and written English communication skills
- Good mediation and facilitation skills
- At least 5 years of work experience related to legal expertise in non-financial controls i.e., processes implemented by the organization to help it ensure that the legal, procurement, operational, commercial, and other non-financial aspects of its activities are being properly managed according to the laws, and which can reduce bribery risk

Specific professional experience

- Experience in projects related to drafting internal procedures
- Experience in keeping the business up to date with legal requirements
- Working experience in Western Balkans and especially in Serbia is an advantage
- Strong oral and written Serbian communication skills is an advantage.