

GOVERNANCE AND REGULATION OF ALIGNING ISO 37001 IN MITIGATING CORPORATE BRIBERY RISKS

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Abstract

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The purpose of this paper is to examine how corporate social responsibility (CSR) and good corporate governance (GCG) can reduce the occurrence of bribery cases in companies. The research object for this study was ISO 37001. The theoretical foundations used for this study were adopted from Veselovská, Závadský, and Závadská (2020) and Méan and Gehring (2018), focusing on the implementation of ISO 37001 to mitigate bribery risks in reinforcing CSR. A qualitative research method produces descriptive data in words and notes related to meaning, values, and understanding with a doctrinal and social approach. The socio-legal research approach is used to explore primary data in the form of values and interpret the behavior of corporations and legal institutions with an interest in preventing corruption by corporations. The results reveal that the implementation of GCG in the company will minimize the opportunistic nature of management so that it has an impact on improving company performance and supporting the prevention of bribery in company performance. Likewise, the role of a good organizational culture is very important in anticipating opportunistic behavior from a handful of parties who still commit bribery for their own interests and harm other parties.

Keywords: Corporate Social Responsibility, Good Corporate Governance, Bribery, Corporate Ethics, Indonesia

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1. INTRODUCTION

Corruption occurs in various forms, such as bribes, entertainment, extortion, facilitating payments, favors, gifts, gratuities, and travel expenses. The International Anti-Corruption Agency establishes formal global norms against bribery and extortion in business and government transactions, which have high economic and political costs. The government has started an active anti-corruption campaign in public sector governance. Law enforcement is also strengthened through a series of mechanisms to ensure the fair delivery of public sector services to

the business sector. It is to prevent bribery while simultaneously increasing fairness in the national economic system to increase national competitiveness in the global arena. This policy will be expanded in the future to prohibit payment of even very small facilities. Businesses must define and enforce broad anti-corruption norms (Windsor, 2013).

Indonesia adheres to the view that corruption is an extraordinary crime, based on Law No. 30 of 2002 concerning the Commission for the Eradication of Corruption or *Komisi Pemberantasan Korupsi* (KPK), with the argument that corruption in Indonesia has

a widespread, systematic impact and violates the economic rights of the people because it requires extraordinary measures and extraordinary institutions in eradicating it. Based on the KPK's data collection, 40% of the shares in Singapore belong to Indonesians. Another reason is that proving corruption is very difficult, requiring extra effort. According to KPK data, 50% of corruption cases are bribery, in which the briber cannot use a receipt. From its impact, corruption has had a tremendous impact, especially in the economic sector (Ramadhani & Muhaimin, 2012).

The modes of criminal acts of corruption are also very diverse and penetrate all sectors of life, whether carried out by state officials or by business actors or corporations. As a legal subject, corporations have rights and obligations as well as criminal responsibility as individual human beings; if in carrying out their business, they are involved in fraudulent acts or bribery, as is most often done by corporations. This paper attempts to analyze the implementation of corporate social responsibility (CSR) and corporate culture as the basis for improving good corporate governance (GCG) in avoiding fraudulent corporate behavior, especially bribery. More specifically, this paper attempts to analyze the implementation of CSR as a basis for improving corporate governance. CSR is considered important for some companies and institutions because it proves that the company or institution is not only concerned with profit but also pays attention to the surrounding social environment. The company manifests social and environmental concerns in business operations and interactions with stakeholders, realizing that responsible behavior leads to sustainable business success based on ethics.

In many cases, corruption in Indonesia involves many actors from the private sector. Of the total cases handled by the KPK, around 80% involve the private sector. It, in turn, reduces the economy's competitiveness and lowers tax revenues. It requires commitment from Indonesian corporations to mitigate bribery in their internal environment. The goal is to ensure the private sector complies with anti-corruption rules and policies by building a system of integrity within the organization. The system was introduced by ISO 37001 to mitigate corporate bribery risks. By building this ethical attitude, corporate governance can be reflected as an anti-bribery commitment. In general, this form is combined with CSR services. The union of the two at the same time ensures that CSR is used ethically and is not used for personal gain and in violation of the law. In this context, this study seeks to examine how CSR and GCG in the application of ISO 37001 can reduce the occurrence of bribery cases in Indonesian companies.

In terms of contributions to the literature, theoretical results can be useful in identifying the necessary framework for creating clean, corporate governance based on anti-bribery management systems in medium and large-scale corporations. In line with Veselovská et al. (2020), the findings can also be used to make strategic analysis methods to monitor and evaluate the company's organizational culture and external environment as the basis for the formation of the bribery risk index. The application of ISO 37001

and the regulation related to the anti-bribery management system is thus identified qualitatively with an integrative conceptual framework (Adams & Blieszner, 1994). The proposition was then conceptualized into a proposed model. As the main contribution, the model proposed in this study can be used to identify and prevent bribery risks by identifying company size and the capability of corporate social responsibilities they have.

This article is structured in the following sections. Section 1 highlights the theoretical background and actual problems regarding the importance of anti-bribery management in the corporate sector in Indonesia. Section 2 focuses on theoretical studies on corruption and bribery in the corporate sector and the importance of anti-bribery management. Next, Section 3 describes the research methodology. Section 4 is the core part of this study, which presents the findings and formulates the proposed model. Section 5 is a discussion that confirms the findings and justifies them theoretically with previous research. Section 6 of this study is a conclusion that highlights some of the important points of this study.

2. LITERATURE REVIEW

2.1. The crime of bribery and the role of corporate social responsibility

Transparency International (n.d.) defined corruption as the abuse of entrusted power for private gain. Previous research linked the effect of corruption on public trust, weakening democracy (Shabbir, 2017; You, 2017), hampering economic development and further exacerbating inequality, poverty, and social division (Ariely & Uslaner, 2017; Neudorfer, 2015), and the environment crisis (Haseeb & Azam, 2021). Corruption crime by Transparency International (n.d.) is defined as the abuse of the trust of the authorities for personal gain, undermines trust, weakens democracy, hinders economic development, and, even worse, creates social inequality, poverty, social class division, and environmental crises. According to Transparency International (n.d.), the types of corruption are classified into: public servants demanding or taking money or favors in exchange for service, politicians misusing public money or granting public jobs or contracts to their sponsors, friends, and families, and corporate bribing officials to get lucrative deals by corporations.

Graycar (2015) distinguishes between types of criminal acts of corruption based on the practices of abuse of discretion, bribery, and misappropriation. Forms of corporate crime related to business and the economy, such as defrauding stockholders (not reporting company profits properly), defrauding the public (fixing prices and misrepresenting products), defrauding the government (tax avoiding), endangering public welfare (environment pollution), endangering employee's security) and illegal intervention in the political process.

GCG is largely determined by a good corporate culture (Adnan, Hay, & van Staden, 2018; Solomon, 2020). It is deemed more likely to control its members' behavior based on the values and standards of behavior set by the company. It is very necessary to prevent fraudulent acts and other illegal acts that benefit corporations and harm

the state. The crime of bribery is the behavior that corporations most often carry out to launch a business or corporate operations (Lord, 2016). This is because of the nature of the corporation, which is always in contact with the government since the application for a permit for the establishment of the corporation to its operations, with the term facilitation fee (Wu, Chandramohan, & Bali, 2016). Giving gifts or gratifications is considered a bribe if it is related to the position and contrary to the duties or obligations of the recipient (Asmara, 2021). Receiving gratuities for civil servants or state administrators is a potentially corrupt habit, therefore controlling gratification with a counter-culture (Ali, Halim, & Permana, 2021). In global developments, gratification for officials is prohibited in world trade business ethics.

Business organizations are urged to apply strategies to eradicate corrupt behavior and activities; then, corruption prevention strategies must be maintained that can be incorporated into CSR practices and communicated to all members of the organization (Hills, Maouene, Maouene, Sheya, & Smith, 2009). It should be emphasized that all these CSR initiatives lead to anti-corruption efforts that must be communicated both internally to the corporation and externally concerning stakeholders (Joseph et al., 2016). Transparency International (n.d.) suggests that assessing and reducing bribery and corruption risks within a company should be incorporated into the company's overall approach to corporate responsibility. As corporate responsibility, it must survive and grow and be supported where the anti-corruption movement must be fought to operationalize the relationship between bribery and corruption and the corporate responsibility agenda (Joseph et al., 2016).

2.2. Corporate ethics as the basis of corporate governance

Business awareness in determining the direction of corporate policy is more based on awareness of social responsibility as an important thing in attracting the sympathy of the public and investors (Latapí Agudelo, Jóhannsdóttir, & Davídsdóttir, 2019). It is because the corporation is the basic unit of the economy in society and plays an important role in economic growth and social development (Aluchna, 2017). CSR is very important so that people feel the benefits of the existence of corporations in their environment (Nguyen, 2019; Ullah, 2018). Corporate benefits for the community in the form of social responsibility are carried out through actions that give back to the community by contributing charitable donations, production security, job promotion, protection of labor rights, production quality, environmental protection, conservation of natural resources, and others (Wan, Chen, & Ke, 2020).

However, various social activities that are the corporation's responsibility will not be complete without the support of awareness of honesty and integrity inherent in the inner attitude of corporate management and employees as manifested in the ethics of corporate culture (Keong, 2020). Integrity is very important in the corporate culture so that it creates public trust and helps corporations in developing their businesses, such as attracting

investors, reducing transaction costs, increasing operating efficiency, and improving corporate profits and performance (Denison & Mishra, 1995; Gosling & Huang, 2009; Hsu, 2007; Reichheld & Teal, 2001; Simons, 2002).

In a corporate culture, integrity is the core value, which will be realized in the norms that must be adhered to by leaders, employees, and people within the corporation. The corporate culture, which is a set of norms, will guide corporations in their behavior. A set of norms and values firmly held in an organization determine how people within a company interact with one another and in relationships with stakeholders outside the corporation (Schein, 1985). Corporate culture is deemed more likely able to bind societal relations with the corporation. It is perceived to be able to bind corporate members and shape their attitudes and behavior. It, in turn, influences various corporate behaviors, such as corporate involvement in CSR (Kucharska & Kowalczyk, 2019).

2.3. Corporate social responsibility and corporate culture as values of corporate behavior

CSR is a management concept whereby companies integrate social and environmental concerns into their business operation and interaction with stakeholders (Carroll, 2015). CSR can be defined as compliance with corporate ethics outside of compliance with state regulations (Boesen, Hinton, & Freeman, 2016; Avesani, 2020). The corporation internally creates its own ethical behavior to support its successful performance in relation to society (Kilcullen & Kooistra, 1999). It is important to ensure the integrity of CSR with the environment and society in its business operations and the company's interactions with its stakeholders (Rochmayasari, 2022).

The CSR function determines the extent to which a good corporation must behave and fulfill a sense of community satisfaction (Oketch, 2004). Two basic things are the goals of CSR, namely to increase the level of environmental and social awareness of entrepreneurs and create sustainable social and environmental awareness to develop best practices in line with corporate culture through changes in social relations and internal working relationships within the company (Albareda, Tencati, Lozano, & Perrini, 2006; Aslan & Şendoğdu, 2012). Within the scope of business ethics and social responsibility, a corporation can be evaluated both normatively and from a descriptive perspective (Ferrell, Crittenden, Ferrell, & Crittenden, 2013). Meanwhile, from a normative perspective, it explains what should be done in evaluating and improving business ethics. Here, all CSR activities can be observed. The role of organizational leaders in making decisions about how to relate to stakeholders is an important part of both CSR and ethical outcomes (Ferrell, Harrison, Ferrell, & Hair, 2019). In CSR, there is an obligation to provide social benefits to the community, which is part of the existence of philanthropic benefits, and to provide the community with positive social values, as the purpose of CSR is to give back to the community, take part in philanthropic causes, and provide positive social values. CSR plays a role in improving business in making companies

different in building a company brand with positive values (Jurišová & Durková, 2012). Many companies view CSR as an integral part of their brand image. Customers' trust will make them run their business more comfortably, precisely with the existence of brands that are understood more than business ethics (Ferrell et al., 2019). Here, CSR can be an important component of the company's social relations with the community and the founders of the company. It will be motivated to engage in CSR in the trust between them (Keong, 2020).

3. RESEARCH METHODOLOGY

This study is qualitative research, the method that produces descriptive data in the form of words and notes related to meaning, values, and understanding with a doctrinal approach and a social approach. In this study, the socio-legal approach was used to explore primary data in the form of values and interpret the behavior of corporations and legal institutions with an interest in preventing corruption in the form of bribery in corporations. The object of this study was ISO 37001. In addition, legal research/doctrine research is also used to explore theories, and concepts as secondary data, obtained from library research or literature related to the problem. The data were analyzed by using the qualitative method.

The basis for defining the angle of the analysis is by using an integrative conceptual framework. This is a useful approach in qualitative inquiry to highlight the important points and connect their relationship in an integrative framework (Adams & Blieszner, 1994). As some previous research highlighted, the framework can be used in the governance sector (De Roeck & Maon, 2018; Marzuki, Hasnan, & Ali, 2022). The framework is built based on aspects of organizational culture related to GCG and CSR. Both are used as the basis for analyzing behavioral motives, resources, and organizational culture, which in turn affect the pattern and structure of the implementation of ISO 37001 and anti-bribery management systems in the corporate environment. In addition, the integrative conceptual framework in this context is employed to identify external and internal network relationships that influence each other through governance processes and CSR. The relationship between the two ultimately gives rise to the elements of this integrative framework that can be used to identify the paths and phases of implementing ISO 37001 and anti-bribery management systems.

Data analysis was processed qualitatively through descriptive analytical techniques. The analytical model used is interactive as proposed by Miles, Huberman, and Saldaña (2019), with an interactive model of analysis carried out through a series of stages of data collection, data reduction, data display, and conclusions.

4. RESULTS

Many corporations in Indonesia have committed to building a positive image toward anti-corruption practices by using some ethical channels. They utilized some measures obliged by the government in the form of anti-bribery management system (ABMS) certification with the implementation of

ISO 37001 to ensure that they are involved and participative in anti-corruption practices (Field, 2017). They align CSR with anti-corruption ethics.

The first notion to this alignment was the response to the high number of corruption in Indonesia involving corporate sectors with bribery in licensing and corruption in procurement. As a response, the Indonesian government issued Presidential Instruction No. 10 of 2016 concerning Actions for the Prevention and Eradication of Corruption in 2016 and 2017, and this instruction is addressed to all ministries, central government institutions, and regional governments to take action to prevent and eradicate corruption, from various aspects according to the characteristics and main tasks and functions of each of these institutions. One action plan that is emphasized for preventing acts of corruption is the development of the ABMS certification.

The ABMS was used as a basis to build a positive culture within the organization. This is consistent with previous research highlighting the crucial role of organizational culture as the main ethical guide to reducing corruption practices within the organization as well as improving business performance (Halter, de Arruda, & Halter, 2009; Spiller, 2000). Moreover, corporate culture is closely related to corporate performance (Cui & Hu, 2012). Previous research argues that corporate culture is important in corporate performance's financial and non-financial success (Spencer-Cooke & van Dijk, 2017). As a managerial control, corporate culture is also believed to be an ideology within an organization or corporation that contains behavioral guidelines to achieve corporate success. Corporate culture combines organizational concentration and structure, which adopts a unique set of values and beliefs (Barth & Mansouri, 2021).

Furthermore, the ABMS certification, or ISO 37001:2016, is a management system standard issued by the International Organization for Standardization (ISO) in 2016 with the title "Anti-Bribery Management System — Requirements with Guidance for Use". This standard was then adopted identically by the National Standardization Agency or *Badan Standardisasi Nasional* (BSN) to become Indonesian National Standard or *Standar Nasional Indonesia* (SNI) ISO 37001:2016 concerning "Anti-Bribery Management System — Requirements with Guidelines for Use". Aurachman, Zunaidi, and Febriani (2020) have highlighted the significance of the ABMS as a set of interrelated and interacting elements in an organization to direct and control the organization by developing, establishing, and implementing policies, objectives, and processes as an action to prevent bribery. According to Januarsyah, Pratama, Pujiyono, and Gultom (2021), the system through ISO 37001:2016 serves as a standard tool that can be used to manage the risk of bribery that could potentially occur within an organization when interacting with other organizations.

This SNI ISO 37001:2016 standard details the requirements and guides for establishing, implementing, maintaining, reviewing, and improving an ABMS. According to Hanindita, Julaha, and Soewito (2021), the system can stand alone or can be integrated with all other management systems. This standard addresses the types of bribery to

organizations which include bribery in the public, private and not-for-profit sectors, bribery by an organization, bribery by personnel acting on behalf of the organization or for its benefit, bribery by a business partner of the organization acting on behalf of the organization or for the benefit.

Through Presidential Instruction No. 10 of 2016, the Government of Indonesia mandates BSN to be in charge of anti-corruption certification initiatives with criteria such as the successful completion of international standards such as ISO 37001 for the private and government sectors at the end of 2016. Until December 2016, BSN adopted ISO 37001:2016 identically to become SNI ISO 37001:2016 concerning Anti-Bribery Management System – Requirements with Guidelines for Use. Then, starting in 2017, BSN facilitated the pilot project for ABMS implementation (Suratno, Wiyana, Suwarno, & CPB, 2020). In 2018, a Joint Decree was issued between the KPK Leaders, the Minister of National Development Planning (*Bappenas*), the Minister of Home Affairs, the Minister for Empowerment of State Apparatus, and the Presidential Chief of Staff regarding Actions to Prevent corruption in 2019–2020 where there are actions to implement anti-bribery management in the government sector and the private sector with the person in charge, namely the Special Task Force for Upstream Oil and Gas Business Activities, Financial Services Authority, National Professional Certification Agency, and Ministry of State-Owned Enterprises.

As for the implementation of the ABMS, the success criteria include some important points. The first is improved anti-bribery management for private companies. The second is increasing the anti-bribery profession in the private sector. The measure of the success of this action is the widespread application of anti-bribery management by using a standard similar to ISO 37001 and anti-bribery guidelines for the private sector through the Financial Services Authority, the Ministry of State-Owned Enterprises, the Special Task Force for Upstream Oil and Gas Business Activities, the Chamber of Commerce of Indonesia, Business Associations, and Local Governments. Until 2020, the Ministry of State-Owned Enterprises requires all state-owned enterprises (SOEs) to obtain ABMS SNI ISO 37001:2016 certification. According to Veselovská et al. (2020) and Méan and Gehring (2018), this standard addresses the types of bribery in organizations worldwide to reduce bribery risks. The system includes many forms of bribery, such as bribery by the organization, bribery by personnel acting on the organization's behalf or for its benefit, bribery by business associates acting on behalf of the organization or for its benefit, and bribery by the organization.

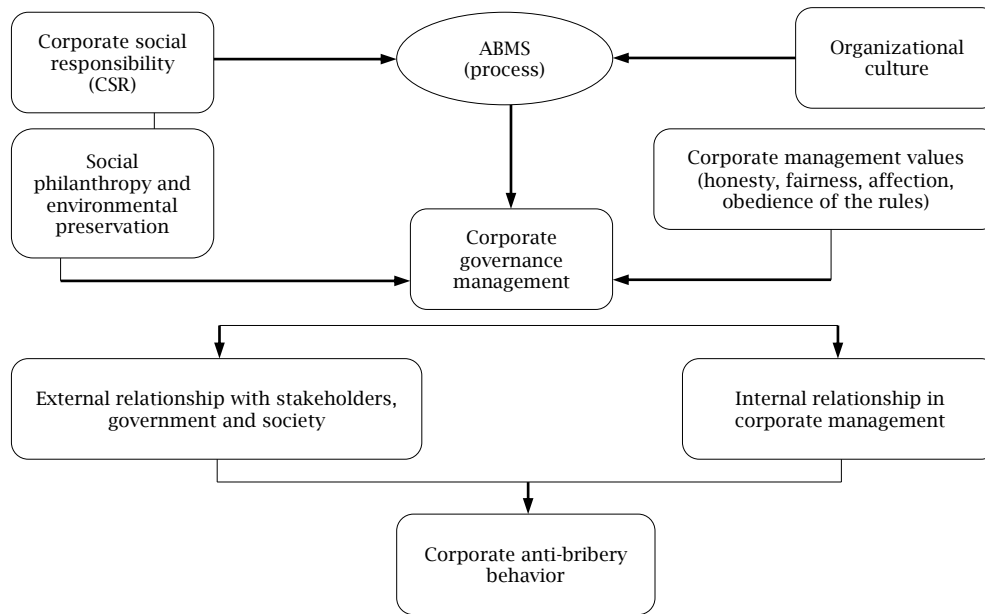
In this regard, there are three important elements that apply if there are organizational activities, both legal and illegal, both within the organization and related to cooperation, that reduce the sustainability of the application of corporate culture ethics. The three elements are 1) existence as the core of ethical values bound through corporate ethics, such as integrity; 2) the establishment of formal ethics programs such as ethics training; and 3) the existence of sustainable leadership ethics, which is in accordance with

the tone at the top which is realized by a board of directors, senior executives, and managers (Suh & Shim, 2020). These three important elements were applied in Indonesian corporations implementing an ABMS. The first is preventing, detecting, and dealing with bribery risks. With the application of ABMS in an organization, the organization can increase the opportunity to detect bribery risk, create an effective and efficient mechanism to prevent bribery, and improve risk management within an organization. The second is to gain or increase international recognition. According to Cherepanova (2021), organizations implementing ISO 37001 have a great chance of getting international recognition. This is because ISO 37001 is a standard that is recognized and widely known, and applied internationally. This ISO 37001 was compiled and developed by the International Organization for Standardization (ISO), an organization widely recognized internationally as the organization authorized to prepare standards.

In addition to the things mentioned above, the advantage that will be obtained by an organization when implementing ABMS is getting conformity with applicable national or international laws. With the implementation of ABMS, organizations are required to implement legal compliance with applicable laws and regulations. The third is to increase the trust of business partners and self-confidence. The application of ABMS in an organization will increase the trust of business partners related to the organization's operations. This is because business partners will prefer a clean organization and maintain its integrity. Besides this, the application of ABMS will increase the organization's confidence when dealing with business partners on a national or international scale. The fourth is reducing costs. The application of ISO 37001, which requires an organization to implement financial or non-financial controls, will be able to reduce costs that may arise due to fraud, budget irregularities, and bribery risks. In addition, according to Field (2017), the controls required in this ISO 37001 will facilitate the tracking of financial and non-financial transactions to prevent or detect bribery.

The fifth is to prevent conflicts of interest. With the implementation of ABMS in an organization, an organization must increase the awareness of employees and business partners about the dangers of bribery. One of the things that are of concern to ABMS is the management of potential conflicts of interest within the organization. Moreover, the application of ABMS is expected to increase the opportunity for due diligence for an organization and in detecting and preventing fraud/bribery. The sixth is to increase the anti-bribery culture. The main advantage that will be obtained for an organization by implementing ABMS is the creation of an anti-bribery culture in an organization. So with the creation of an anti-bribery culture, there will be general improvements in employment relations and employee performance. Lastly, the seventh is to assist in the litigation process. In the case of investigations, the application of the ABMS can help provide evidence to both the Prosecutor and the Court that the organization has taken steps to prevent bribery. The proposed model is shown in Figure 1.

Figure 1. The schematic framework of the role of corporate social responsibility and organizational culture in shaping corporate anti-bribery management



The results are in line with previous research presenting the important role of CSR and corporate culture in shaping anti-corruption practices as their ethical guides. Laczniak and Kennedy (2011) stated that based on the normative perspective, business ethics is aimed to explore the principles, values, and norms of organizational decisions. Meanwhile, from a descriptive perspective, business ethics in an organization refers to codes, standards of behavior, compliance with the system, and specificities related to decisions that can be judged right or wrong by customers. Furthermore, ethical decision-making is specifically concerned with internal organizational decisions by individuals and social units about appropriate behavior. This decision can affect internal and external stakeholders. The results also support previous findings denoting the CRS for corporate sectors. From a normative perspective, CSR focuses on values and principles in fulfilling economic, legal, ethical, and philanthropic responsibilities (Chen, Chen, & Jebran, 2021). Meanwhile, Azheri (2016) stated that social responsibility issues can be legalized through the rule of law from a descriptive perspective.

5. DISCUSSION

In particular, corporations mostly do corruption with the mode of bribery, where corporations have an interest in licensing establishments and operating corporations, especially in the world of global trade. A strategic strategy is needed in eradicating bribery among corporations, where penal efforts have been carried out even though they have not been maximized in corporate punishment. Based on the 2021 corruption perceptions index made by Transparency International, Indonesia is ranked 96th as a country that is less transparent than 180 countries, where the score reaches 38 (on a scale of 0-100). In particular, most corruption cases in Indonesia are dominated by bribery cases (41%),

goods and service procurement (38%), and budget misappropriation (13%), while the remaining cases are related to unauthorized collection (4%) and licensing (4%). Here the international aspects of bribery and corruption are always related to Indonesian businesses or corporations (Lukito, 2015).

The corporation as a legal entity in society is not a solitary or separate entity from the community. Therefore, it is strongly influenced by external issues in the corporate environment, which often trigger the occurrence of bribery in corporations, such as social and cultural aspects, politics, laws, norms, and regulations that apply, networks, business processes, and other organizational resources, finance and macroeconomics, technology, environment, and natural resources, and competition in the market.

Concretely, external issues in the corporate environment can be in some forms. The first is implications for applicable laws and changes in laws and regulations, changes in political, social, and cultural situations and conditions in a region or country. The second is dependence on business partners, so an organization must adapt to the business processes, services, resources, and infrastructure of other organizations as business partners. The third is macroeconomic changes that may impact organizations' financial condition and business actions for their business continuity. The fourth is the possibility of threats and disasters such as natural disasters (fires, floods, and earthquakes) that have an impact on the operations and sustainability of an organization. The fifth is advances in information technology that demand changes in business processes or how organizations act. The sixth is general demand from customers and the public who want excellent and corruption-free organizational services.

Meanwhile, internal corporate issues that are very influential in preventing bribery include organizational culture; policies, objectives and strategies to achieve these goals; governance,

organizational structure, roles, delegation of authority, organizational complexity and accountability; locations and sectors in which the organization operates or anticipates the organization's operations; standards, guidelines and business models adopted by the organization; entities that are under the control of the organization and entities that exercise control over the organization, such as subsidiaries or holding companies; the nature and extent of the organization's interactions with public officials; contractual relationships with other parties that can directly affect business processes within the organization that are included in the scope of ABMS implementation; business processes and procedures applicable in the organization; organizational capabilities include organizational resources and competencies (e.g., capital, time, personnel, processes, systems and technology); physical infrastructure and environment; information system owned by the organization; and, the results of the audit or risk assessment in the organization.

Internal policies within an organization include all requirements defined by the organization, such as policies regarding anti-bribery, policies related to resources, codes of ethics, and regulations. This company's internal policy is strongly influenced by how the company carries out CSR and implements a corporate culture, as the company's internal control prevents bribery. The company's management leadership's belief in implementing CSR and corporate culture in company management greatly influences the company's performance. In realizing corporate philanthropy and CSR on an ongoing basis so that corporations are prevented from fraudulent acts that are detrimental to the state's economy, corporate culture is needed, namely, an organizational culture that refers to values, attitudes, standards, and beliefs that provide an overview of the company's characteristics. There are six elements in the corporate culture. The first is vision and mission, namely phrases or statements that guide the values and goals of the company. The second is company values, which are the core of the corporate culture. These values are used to create behavioral guidelines and a framework for achieving the company's vision. The third is practice, which requires human resources as the most important asset in the company, where the value of caring and respect promises workers to love their work. The fourth is people who are an important element in implementing corporate culture, as actors who carry out company values and have a strong desire to adhere to the behavioral values set by the company. The sixth is the company narrative, while the last is place as the environment in which the company is located (Coleman, 2013).

GCG is largely determined by a good corporate culture so that it can control the behavior of its members based on the values and standards of behavior set by the company. This is very much needed in preventing fraudulent acts and other illegal acts such as bribes that benefit corporations and harm the state. The results show that CSR and corporate culture support GCG. Companies that comply with government regulations run their business honestly both internally and externally in relation to stakeholders and have an attitude of

responsibility towards their social environment are committed to committing the crime of bribery. This kind of company will always maintain its brand or image in the eyes of the public as a company that can be trusted, where trust is the biggest capital in the business world.

6. CONCLUSION

The results highlight the importance of ISO 37001 to mitigate bribery risk in the corporate sector. The findings also underscore that corruption in the form of bribery is mostly carried out by Indonesian corporations, where corporations are interested in licensing establishments and operationalizing corporations in contact with the government bureaucracy. In its existence as a good corporation, it requires the implementation of CSR and corporate culture, which supports corporate management externally in relation to the community and stakeholders and internally in relation to corporate management itself. That way, transparency within the company will be realized, and the chances of bribery cases will decrease.

The belief that the leadership of the company's management in implementing CSR and corporate culture in company management greatly affects the company's performance. Therefore, a corporate culture contains guiding values and company goals in the vision and mission. Corporate values are used to make behavioral guidelines and a frame of mind to achieve the company's vision. By using ethical guidelines such as ISO 37001 to mitigate bribery risks, the company is more likely to have a strong stance and desire to adhere to the behavioral values set by the company.

As a practical implication, these findings encourage the wider application of ISO 37001. Furthermore, the implementation must be cultivated in the CSR scheme. It is functioned to control the company based on the ethical values and standards of behavior set by the company. Ultimately, this can be useful in preventing fraudulent acts and illegal acts such as bribery that can harm the company. Furthermore, this research encourages every company to have values and standards of behavior by implementing ISO 37001, which every employee must carry out. It ensures that every company employee has responsibilities that must be carried out according to corporate governance. In the end, this will positively impact the company because a high sense of employee responsibility can increase company performance in general.

Although it is expected that the acquisition of ISO 37001 certification will increase organizational transparency and credibility and encourage the creation of a healthy culture, its importance has not been fully carried out effectively for the organization that has obtained the certification. To this end, it is necessary to increase understanding and awareness of the importance of ABMS certification through reinforcement of socialization and training. Moreover, increasing the network for socialization and training is desirable to increase the awareness of ABMS certification. However, since ISO 37001 is an international standard, and its application is not compulsory, it is important to take a government

approach. Therefore, it is necessary to devise measures to raise awareness at the level of related organizations and associations. This study looked at ways to activate ABMS from the perspective of organizational culture and CSR regarding ISO 37001 certification. However, in future research, exploring ways to activate ABMS certification is necessary through more in-depth research and analysis. In

other words, it is necessary to derive a specific activation plan from the point of view of recognition and the practical sector related to acquisition and operation. A detailed investigation related to the acquisition and operation of ISO 37001 certification for an organization that has obtained ABMS certification will help to find a practical and effective way to activate it.

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