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Types of conflicts of interest

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Conflicts of interest (COIs) constitute one of the most pervasive risk areas in the compliance and ethics (C&E) realm and are a source of endless fascination for me. As editor of the *Conflict of Interest Blog*^[1] for the past six years, I've tried to focus on (among other things) accurately categorizing the various types of COIs.

Take, for example, the case of apparent versus potential conflicts of interest. The two are often used interchangeably, but they have different meanings. The former generally refers to “existing situations or relationships that reasonably could appear to other parties to involve a conflict of interest...[whereas the latter generally refers] to situations that do not necessarily constitute or appear to constitute a COI but where there is a reasonable possibility of an actual or apparent COI coming into play...For instance, where A works at company X, which has as a supplier company Y, and A's daughter B is considering applying for a job at Y, this is not yet an actual or apparent conflict because B has not yet moved her job plans forward. But (depending on a variety of facts not provided in this example) the potential for a conflict is there.”^[2]

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