

CEP Magazine – July 2022 Learning from enforcement actions

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One of the best methods of learning about compliance and ethics programs is to review enforcement actions. And some recent actions provide very useful guidance regarding one of the most important elements of any compliance and ethics program: the risk assessment.

I won't bother naming the companies involved—that only gets me in trouble anyway, and the lessons are clear. Instead, I'll just describe three of the common themes I've noticed in reviewing several recent cases.



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