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Jeffrey M. Kaplan (jkaplan@kaplanwalker.com) is Partner with Kaplan & Walker LLP in Princeton, New Jersey, USA. Kaplan is also editor of the Conflict of Interest Blog (www.conflictinterestblog.com).

The full promise of compliance and ethics programs

By Jeffrey M. Kaplan

One of the most challenging aspects of the compliance and ethics (C&E) field is setting the optimal boundaries of the C&E program. Take the example of “moral hazard,” a concept that seeks to align the interests of those who take risks with those who bear the impact of such risk-taking. In my view, these types of risks are under-addressed at many companies.

True, moral hazard risks are similar to conflict of interest threats; however, the two differ because the interests at issue in the former are not external and/or are unknown to an affected organization. For this reason, they should be addressed in the C&E program.

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