

## CEP Magazine – February 2019 Conflict-of-interest policies and procedures

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By Jeffrey M. Kaplan

Jeffrey M. Kaplan ([jkaplan@kaplanwalker.com](mailto:jkaplan@kaplanwalker.com)) is a Partner with Kaplan & Walker LLP in Princeton, New Jersey, USA.

Conflicts of interest (COIs) have long been among the most common sources of compliance and ethics (C&E) risk. They have also long been of interest to me—particularly since, as much as any C&E risk area, they can be seen as existing “where law and ethics meet.”

But effectively mitigating risks in this area can be quite a challenge. What should a company seeking to develop or enhance a COI C&E program focus on?

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