

CEP Magazine – April 2019 Compliance incentives

By Jeffrey Kaplan

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

The Sentencing Guidelines provide, in relevant part: “The organization’s compliance and ethics program shall be promoted and enforced consistently throughout the organization through...appropriate incentives to perform in accordance with the compliance and ethics program...”^[1] Providing discipline for violations is, of course, a form of incentive, but what is contemplated by the above-cited provision is something different—a *positive* incentive.

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