

## CEP Magazine - October 2021 Consider a COI subject matter expert for your team

By Jeffrey M. Kaplan

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As the compliance and ethics field develops, so does the imperative of creating or acquiring relevant subject matter expertise for key areas such as corruption or trade. Does this approach make sense for conflict of interest (COI) too?

In my view, not all programs need to have this sort of position. But those with relatively high COI risks should consider establishing one. The role is not likely to require the full-time attention of the appointed employee, i.e., it can be an additional responsibility for an individual already in the compliance and ethics department. But the role should be documented, such as in the individual's job description. Among other things, such documentation can help create clout for the position. It can also serve to educate the workforce as to the importance of effective COI compliance to the company, including these benefits:

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