CONFLICTS OF INTEREST: Awareness, Bias and Corruption

Advanced Discussion Group

Introductions

📌 Who are you?

📌 Who do you report to?

📌 # of years as compliance professional

📌 Industry
Conflict of Interest – Policy and Disclosure

1. Does your organization have a standalone policy?
2. What is your disclosure process?
3. Does your organization maintain a database to manage disclosures?
4. How many believe disclosure is an effective remedy to manage conflicts of interest?
5. Some research suggests it is ineffective – do you agree? Do you disagree? Why?

Conflicts of Interest - Communications and Training

1. How do you discuss Conflicts of Interest in your training and communications?
   - Are they perceived as wrong causing employees to fail to disclose?
   - Do you adequately define conflicts of interest so employees understand what it is and understand their responsibility to disclose?
Bias – Story of Nasreddin

Are we looking in the right places?

The severity of bias caused by conflicts is often underestimated. Do you agree?

To be biased is almost as natural as breathing. Do you agree?

Relationship between Conflicts and Corruption

Understanding the relationship can lead to new ways to deter and detect misconduct

COI exists when someone can abuse their position for personal gain

Corruption exists when someone does abuse their position for personal gain
Cindy Morrison
Director of Compliance
Post Holdings, Inc.
cindy.morrison@postholdings.com
(314) 644-7650