



NOVEMBER 13-14, 2017 ★ MANDARIN ORIENTAL ★ WASHINGTON, D.C.

Compensation and Conflicts

Building an Effective Compliance Program



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Speakers

**Louis Dempsey, President
Renaissance Regulatory Services, Inc.**

**Jonathan Cyprys, Associate
Greenberg Traurig, LLP**

**David W. Porteous, Partner
Faegre Baker Daniels LLP**



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Overview

Participants will learn how to develop and implement an effective compliance program for preventing and detecting compensation related conflicts. Topics covered will include the appropriate CCO involvement in compensation plan development, as well as plan testing, surveillance, identification of potential conflicts and reporting to management.





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Developing the Comp Plan

Senior management role

CCO involvement in plan development

- **Advisory**
- **Identify potential conflicts**
- **Develop testing plan**

Legal considerations



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Testing the Plan

Testing what and when

- Review written compensation plans
- Sample representative payouts and tie back to production
- Assess overrides for supervisors
- Periodic cycles



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Testing the Plan

Monitoring for Compliance

- Sales statistics
- Production by representative
- Production by region
- Production by product/sponsor



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Testing the Plan

What to look for – Influence on sales

- Higher level managers
- Product sponsors
- Product goals
- Sales contests/organizational goals



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Reporting and Remediation

Reporting and escalation

- Internal Reporting
- When to seek outside counsel

Potential legal exposure

- Firm
- CEO
- CCO



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Questions

Thank You

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