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# Walmart's Jay Jorgensen

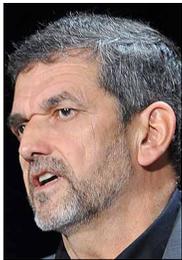
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Thomas Lee, a *San Francisco Chronicle* business columnist published an article entitled, "Top Walmart official says retailer strives to prevent corruption." The article was about Walmart Global Chief Compliance Officer Jay Jorgensen.



Snell

What Jorgensen said is insightful. What Jorgensen said was related to third party contractors, "It sounds simple, but it's important to first know who they are." While others are writing 45-page risk assessments, in their office writing policies for months, and complicating a simple task, Jorgensen is out looking for the people who may cause Walmart trouble.

Here is another excerpt from the article: The company has separated its compliance staff from its Legal team to eliminate potential conflicts of interest—so that lawyers won't have to think, "Do I defend the company, or do I report things that are wrong?" Jorgensen said.

Jorgensen is plainspoken, direct, and correct. You cannot have the responsibility of defending the company and be independent. A compliance officer that is not independent... is not a compliance officer. You cannot have your annual review done by someone that is defending the company and be an independent compliance officer.

The only thing I questioned a little in the article was, "There is no textbook on how to

be a chief compliance officer," Jorgensen told a group of students and faculty at a UC Davis law school symposium Friday.

I think what Jorgensen meant was that you can't learn this job by reading a textbook. I think I get what he meant and, if so, I agree. There are books like *Compliance 101*, *The Compliance Professionals Manual*, and *Building a Career in Compliance and Ethics*? I am sure there are other good books. Based on my limited exposure to his philosophy, if Jorgensen wrote a book... I would buy it.

**What Jorgensen said was related to third party contractors, "It sounds simple, but it's important to first know who they are."**

Jorgensen's comments in this article indicate that he understands this profession. He is not lost in the weeds like so many others that complicate the process. He is not in his office writing endless risk assessments and countless policies. He is out looking for people who put their company at risk and doing something to reduce risk. He is someone we should listen to.

(Jay Jorgensen was also featured in the September 2014 issue of *Compliance & Ethics Professional*) \*