

DOJ disclosure and whistleblower programs demand ‘prudent’ companies adopt an effective internal investigations strategy

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Davis Polk counsel Bill Hochul authored “DOJ disclosure and whistleblower programs demand ‘prudent’ companies adopt an effective internal investigations strategy” in *The Review of Securities and Commodities Regulation*. In the article, Bill notes that, over the past year, federal prosecutors have issued new policies aimed at corporations that include voluntary self-disclosure guidelines as well as financial and other incentives for whistleblowers. In response, he argues that prudent businesses should create a robust internal investigations strategy, including when to hire outside counsel and how to handle whistleblower complaints.

The article was published in the June 5, 2024, edition of *The Review of Securities & Commodities Regulation*.