

SEC Reopens Comment Period on 2015 Pay Versus Performance Proposal

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On January 27, 2022, the Securities and Exchange Commission (the “SEC”) reopened the comment period on its proposed rules that would require disclosure by reporting companies describing how executive compensation relates to the company’s financial performance over time (the “Proposed Rules”). The Proposed Rules were originally released in April of 2015 and are intended to implement the “pay versus performance” requirement of the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd Frank Act”). Our April 2015 firm memorandum discussing the original Proposed Rules can be found [here](#). This memorandum summarizes the Reopening Release and the changes made to the Proposed Rules and highlights some of the additional questions raised for comment.

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