

Publications

Mandatory Deferral of Financial Institution Bonuses and Impact on Nonqualified Deferred Compensation Plans

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PUBLISHED

05/20/2016

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Recently proposed rules could have a major impact on the incentive plans of financial institutions and raise issues under section 409A and other sections of the Internal Revenue Code (“Code”). On May 6, 2016, the Securities and Exchange Commission (“SEC”) was the last of six financial regulators to re-propose rules under Section 956 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) that provide for restrictions on incentive-based compensation arrangements at covered financial institutions with at least \$1 billion in assets.

Please see the attached memo for further information.

[Mandatory Deferral of Financial Institution Bonuses and Impact on Nonqualified Deferred Compensation Plans](#)[Download](#)