

**Publications**

# SEC Proposes “Pay for Performance” Rules under Dodd-Frank Act

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On April 29, 2015, the Securities and Exchange Commission (SEC) released a proposed rule that would require a public company to disclose the relationship between the compensation of its top executives and the company’s financial performance.

This so-called pay for performance rule is the latest in a line of executive compensation rules issued or proposed by the SEC under the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act). Like the CEO pay ratio disclosure rule proposed on September 18, 2013, the SEC proposed the pay for performance rule following a 3-2 vote. Please see the attached memo for further information.

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[SEC Proposes “Pay for Performance” Rules under Dodd-Frank Act](#)