

Publications

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

ATTORNEYS & PROFESSIONALS

William Fogleman

wfogleman@groom.com

202-861-6619

Jeffrey W. Kroh

jkroh@groom.com

202-861-5428

Louis T. Mazawey

lmazawey@groom.com

202-861-6608

Brigen Winters

bwinters@groom.com

202-861-6618

PUBLISHED

05/01/2015

SERVICES

Employers & Sponsors

Executive Compensation
Programs

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.

RELATED MATERIALS:

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