Davis Polk

Davis Polk Submits Comment Letter to the SEC on Implementation of Pay Ratio Rule

March 24, 2017 | Client Update

Davis Polk has submitted a comment letter on the SEC's implementation of the pay ratio rule. We previously summarized the final rule here.

Our comment letter focuses on implementation challenges and the significant administrative and financial burdens facing companies in connection with compliance with the pay ratio rule.

Law Clerk Charlotte Fabiani contributed to the drafting of this letter.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

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