

SEC Maintains Its Focus on Perk Disclosures

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The SEC has shown its willingness to continue to take companies to task for not disclosing perquisites and personal benefits to executive officers in a manner that is consistent with the SEC's expectations. Unfortunately, the SEC's standard is often challenging to put into practice.

This memo highlights recent SEC guidance on potential perks related to the COVID-19 pandemic, describes the SEC's latest enforcement activity and summarizes the recent series of SEC enforcement activity involving executive perks.

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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