

Inadequate Perk Disclosure Remains in SEC's Sights

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A \$900,000 fine is a reminder for companies to use care in tracking and disclosing all elements of executive compensation.

Executive perks may not be material to a company's financial condition. But the latest in a series of SEC cases shows that the expense, distraction, and potential reputational impact of an enforcement investigation can be significant.

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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