

Keith Higgins' Comments at the Society Annual Conference and More on the SEC Guidance on the Use of Proxy Advisory

July 2, 2014 | Client Update

On TheCorporateCounsel.net, Broc Romanek and I prepared a 13-minute [podcast](#) summarizing Keith Higgins' remarks made at the Society of Corporate Secretaries and Governance Professionals' national conference last week. On the podcast, we describe Keith's discussions about the SEC pay ratio and other Dodd-Frank rulemaking, the disclosure reform (or disclosure effectiveness) project, a 14a-8 shareholder proposal stakeholder meeting held by the SEC staff, the controversy over interim vote tallies and whether the SEC staff intend to review conflict minerals filings and provide further interpretations.

At the conference, Keith indicated that the SEC will soon issue guidance regarding the use of proxy advisory firms. That guidance in the form of a staff legal bulletin was released late Monday, and we talk about the content briefly in our podcast. See the Davis Polk [memo](#) for additional information.

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.

Ning Chiu

+1 212 450 4908

ning.chiu@davispolk.com

This communication, which we believe may be of interest to our clients and friends of the firm, is for general information only. It is not a full analysis of the matters presented and should not be relied upon as legal advice. This may be considered attorney advertising in some jurisdictions. Please refer to the firm's privacy notice for further details.