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SEC Proposes Sweeping Overhaul of Executive and Director Compensation Disclosure

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Executive Overview

On November 13, 2026, the U.S. Securities and Exchange Commission (SEC) proposed amendments to Item 402 of Regulation S-K that would overhaul executive and director compensation disclosure rules for public companies. The most recent comprehensive reform of these rules occurred in 2006. The proposal follows the SEC's June 2025 executive compensation roundtable and would make the requirements more principles-based and materiality-driven. Like the SEC's May 2026 proposal to permit optional semiannual reporting, it is part of the broader effort by Chairman Paul Atkins to reduce regulatory and compliance burdens for companies to go public and stay public.

The proposal would limit named executive officer (NEO) coverage to the principal executive officer (PEO) and principal financial officer (PFO), rather than the five or more NEOs required to be disclosed by most companies today. All individuals who served in either role or acted in a similar capacity during the last completed fiscal year would be included. The Summary Compensation Table and the other five primary compensation tables would be replaced by three new tables that separately show what each executive was granted, what each executive earned, and the status of each outstanding equity award. The perquisite reporting threshold would rise from $10,000 to $150,000, and the SEC would loosen its long-standing interpretive guidance on what counts as a perquisite, including for executive security and airplane travel that the company reasonably determines, in good faith, is integrally and directly related to the executive's job performance. The Compensation Discussion and Analysis (CD&A) would be built around three required topics, and the pay-versus-performance, clawback, and pay ratio rules adopted under the Dodd-

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Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) would each be scaled back substantially.

The proposal would replace several prescriptive requirements with a more principles-based framework. The proposed rules would ask companies to report the compensation that is material to investors, and companies would have greater flexibility in presenting compensation information and greater ability to make company-specific materiality judgments. If the final rules are adopted and published in the Federal Register during 2027, they would take effect on January 1, 2028, and calendar-year reporting companies would first be required to comply with the new rules for 2028 compensation in their 2029 proxy statements, although companies could elect to comply early with respect to 2027 compensation in their 2028 proxy statements.

What the Proposal Would Do

The proposal would:

NEOs and tables. Limit coverage to the PEO and PFO and replace the primary compensation tables with three new tables (an Earned Compensation Table, a Granted Compensation Table, and a Status of Equity Awards Table).

Perquisites. Raise the reporting threshold to $150,000, add a de minimis tracking exclusion, and revise perquisite guidance.

CD&A and Dodd-Frank disclosures. Simplify the CD&A, pay-versus-performance, clawback, and pay ratio disclosure requirements, including removal of both clawback-related check boxes from the cover page of Forms 10-K.

Termination and director compensation. Replace quantitative disclosure of hypothetical termination and change-in-control payments with qualitative disclosure, simplify golden parachute reporting, and allow more flexible director compensation disclosure.

Other reporting changes. Eliminate the standalone compensation-risk and option-grant timing disclosures, and revise related disclosure and registration-statement requirements.

The proposal would apply to all companies that provide Item 402 disclosure, with continued scaled disclosure for smaller reporting companies (SRCs) and emerging growth companies (EGCs).

The proposal should be read alongside the SEC's May 19, 2026, filer status proposal (Filer Status Proposal), which would, among other things, exempt non-accelerated filers from say-on-pay votes. If

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those rules are adopted as proposed, the SEC would also extend the Item 402 accommodations proposed for SRCs and EGCs in this release to all non-accelerated filers.

Comment period and timing. The proposing release was published in the Federal Register on November 19, 2026, and comments are due on or before January 19, 2027. If adopted, the amendments would become effective on the January 1 following publication of the adopting release in the Federal Register, and companies would need to comply beginning with their first full fiscal year ending on or after that effective date. For a calendar-year company, assuming the rules are adopted and published in final form during 2027, that would mean it would need to begin applying the new rules to disclosure of its fiscal 2028 compensation in the proxy statement for its 2029 annual meeting. The SEC is also proposing that, if the new rules are adopted, revised executive compensation disclosure reflecting these changes would be required in any registration statement or prospectus that, on its initial filing date, is required to contain financial statements for a fiscal year ending on or after the effective date of the rules. Companies would have the flexibility to begin complying once the amendments take effect, rather than waiting until the mandatory compliance date.

Key Provisions of the Proposed Executive Compensation Rules

A New Organizing Principle: Material Information, Not "All Compensation"

The proposal would retain the current requirement for clear, concise, and understandable disclosure of NEO and director compensation, but shift the focus from "all plan and non-plan compensation" to material information relevant to assessing that compensation. Proposed Item 402(a)(5) would continue to permit companies to omit a table or column with no reportable compensation in any covered year. Companies would also be expressly permitted to split a column into clearly labeled additional columns or a supplemental table, provided all required items remain covered. Separately, the Instruction to proposed Item 402(a)(1) would expressly permit companies to provide additional information relevant to the disclosure objective in any format they determine appropriate.

Named Executive Officers: From Five (or More) to Two

Today, a company that is not an SRC or EGC must disclose compensation for anyone serving as its PEO during the year, anyone serving as its PFO during the year, its three most highly compensated other executive officers serving at year-end, and up to two former executive officers who would have been among those three most highly compensated officers but for the fact that they were not serving at fiscal year-end. SRCs and EGCs disclose the PEO, the two most highly compensated other executive officers, and up to two former executive officers.

Key aspects of the proposed NEO definition:

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Role-based, not pay-based. NEOs would be limited to individuals who served as PEO or PFO during the last completed fiscal year. Every person who served in either role during the year, including interim, acting, and co-PEOs or PFOs, would count. SRCs and EGCs would also move to the PEO and PFO, which for them would mean adding the PFO (if not already disclosed) and dropping the other most highly compensated officers.

The rationale. The SEC pointed to the PEO's and PFO's strategic roles and their Sarbanes-Oxley Act certification responsibilities. Surveys cited in the release estimated that the change could cut preparation time by 50% to 60%.

Voluntary disclosure of others. A company could choose to include other executives, but only if it completes the required tables for them in full. Those individuals would not be NEOs, so the company would not be required to discuss them in the CD&A, include them in pay-versus-performance disclosure, or file Form 8-K Item 5.02 reports about them, although the general requirement to disclose material information necessary to understand the tables would still apply.

Reach beyond the main tables. The narrower definition would also govern golden parachute disclosure and clawback disclosure.

Three New Tables Replace the Summary Compensation Table and Related Compensation Tables

The proposal would establish three new tables (Earned Compensation Table, Granted Compensation Table, and Status of Equity Awards Table) to replace the current primary tables (Summary Compensation Table, Grants of Plan-Based Awards Table, Outstanding Equity Awards at Fiscal Year-End Table, Option Exercises and Stock Vested Table, Pension Benefits Table, and Nonqualified Deferred Compensation Table). The new tables would be intended, in part, to show an equity award at each stage of its life. The SEC's fact sheet illustrates the concept with a simple example: an executive receives 30,000 restricted stock units on July 1, 2027, at a $10 stock price, vesting ratably over three years. The full $300,000 grant would appear in the Granted Compensation Table for 2027; the Status of Equity Awards Table would track the award's 30,000 units and the cumulative number vested each year; and, assuming the stock price was also $10 per share on each vesting date, $100,000 would appear in the Earned Compensation Table in each of 2028, 2029, and 2030 as each tranche vests.

The Earned Compensation Table. This table would show compensation earned in each covered year and would serve as the most comprehensive picture of material compensation. Key features:

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Columns. Salary earned; non-equity awards earned (consolidating today's separate Bonus and Non-Equity Incentive Plan Compensation columns); stock awards vested, valued at the closing price on the vesting date; option awards exercised, valued on exercise rather than on vesting; a Miscellaneous Compensation Received column; and Total Compensation Earned.

The Miscellaneous column. This column would capture specified items, including perquisites of $150,000 or more, tax gross-ups, discounted securities purchases, termination and change-in-control payments, company contributions to defined contribution and nonqualified deferred compensation plans, above-market or preferential earnings on deferred compensation, life insurance premiums, and dividends on awards, plus any other compensation the company "determines is material or otherwise elects to disclose."

Pensions. For defined benefit and supplemental executive retirement plans, the year-over-year change in pension value would give way to the service cost and prior service cost for the year, determined under the methodology used for financial reporting.

No more "regardless of amount." Companies would no longer need to capture all other compensation regardless of amount, and the detailed footnote requirements for this column would be eliminated.

Years covered. Three years, or two years for SRCs and EGCs

The Granted Compensation Table. This table would show the compensation opportunity granted for each covered year, an approach the SEC likens to the "total direct compensation" framework many compensation committees already use. It would not be a comprehensive measure of pay. Key features:

Columns. Annualized base salary at fiscal year-end; target non-equity awards, including signing and retention bonuses; and stock and option awards granted.

Equity valued at target, not "probable." Equity awards would be reported at aggregate grant-date fair value under Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) Topic 718, except that the target outcome would be assumed to be achieved. Today, the Summary Compensation Table uses the probable outcome. The SEC acknowledges that this may create differences from the amounts in the financial statements, particularly for awards with market conditions and awards whose target outcome is not probable. Where the gap between target

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and probable value is material (for example, a "moonshot" award with a very low probability of achieving target), the company would need to explain it.

A fix for the timing mismatch. Many companies pay annual bonuses and grant equity in the first quarter of the following year, both for the prior year's performance, yet today the bonus is reported in the prior year and the equity in the grant year. Companies could elect to report an equity award in the fiscal year before the grant year if the company considers the award to be for performance in that prior year and grants it in the first fiscal quarter of the grant year. The election must be applied consistently across all years covered and must be disclosed.

Modifications. Repricings and other modifications would be reported based on incremental fair value.

The Status of Equity Awards Table. This table would follow each equity award, row by row, from grant until it is fully vested, exercised, or expired. The table would identify each award and track its terms, share counts, vesting, and exercise or expiration activity. An award drops off the table once fully earned or expired. Because it reports share counts rather than values, it would eliminate annual revaluation of outstanding awards.

Inline Extensible Business Reporting Language (XBRL). Large accelerated filers would be required to tag the three new tables (but not their footnotes) in Inline XBRL; tagging would be optional for all other companies. The existing tagging requirements for pay-versus-performance and clawback disclosure would be eliminated.

Perquisites: A Higher Threshold and More Room for Judgment

For companies that provide executive security or personal use of company aircraft, these may be the most consequential changes in the proposal.

Threshold. Perquisites would be reported in the Earned Compensation Table only if they total $150,000 or more for the executive. The current threshold is $10,000.

De minimis tracking exclusion. Companies could exclude any individual item that qualifies as a de minimis fringe benefit under Section 132(a)(4) of the Internal Revenue Code when determining whether the threshold has been met, which would reduce tracking for purposes of this disclosure threshold. The exclusion would be optional, and the SEC does not expect to provide guidance on the tax question.

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Valuation. Companies would no longer be required to value perquisites at aggregate incremental cost, which would allow them to use values already determined for federal income tax purposes. Aggregate incremental cost would remain permitted.

Revised interpretive guidance. The two-part test from 2006 would remain, but with a different emphasis. The SEC described the first prong (whether an item is "integrally and directly related" to the performance of the executive's duties) as a "narrow" one in 2006. Under the proposed guidance, that determination would be made by the company, so long as it is reasonable and made in good faith. Business purpose and company benefit, which the 2006 guidance said were not responsive to the inquiry, would become relevant factors under the first prong.

Security and aircraft. The SEC would rescind the 2006 examples of items that are perquisites, including security at an executive's personal residence or during personal travel. The release states that if a company reasonably concludes, in good faith, that providing personal security at all times to the PEO or PFO, or requiring the PEO or PFO to use company aircraft for personal travel due to security concerns, is integrally and directly related to the executive's duties, then those services would not be a perquisite.

"Generally available" clarified. A benefit could be treated as generally available on a nondiscriminatory basis if it is available to all employees to whom it lawfully may be provided. Making a benefit available to employees in the same job category or pay scale would not be enough.

A Shorter, Principles-Based CD&A

The current CD&A rule lists seven required topics, and it includes 15 examples of potentially material topics. The SEC cited data indicating that the average CD&A runs about 10,000 words, or 15 pages, and that only 38% of institutional investors find executive compensation disclosure clear.

Under the proposal, the CD&A would be required to cover three topics:

the objectives of the company's compensation program in relation to its corporate strategy;

the material elements of compensation and how those amounts are determined; and

if applicable, whether and how the company considered the results of its most recent say-on-pay vote.

Three current topics would no longer be required (what the program is designed to reward, why the company pays each element, and how each element fits into overall objectives), and the list of 15

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examples would be removed. The proposed instruction would expressly direct companies to avoid boilerplate and retain the existing expectation that the CD&A address material compensation actions taken after fiscal year-end. SRCs and EGCs would remain exempt from the CD&A.

One provision moves in the opposite direction. The proposal would require companies to reconcile non-GAAP compensation targets and company-selected measures based on historical results to the most directly comparable generally accepted accounting principles (GAAP) measure. Companies would also need to explain why the non-GAAP measure is more appropriate than a GAAP measure for setting compensation or assessing pay versus performance. The exemptions from Regulation G and Item 10(e) would remain. The competitive harm exception for undisclosed targets would be retained.

Pay-Versus-Performance: Compensation Actually Paid Is Out

The current rule requires five years of disclosure (three for SRCs) of "Compensation Actually Paid," a measure derived from the Summary Compensation Table through complex equity revaluation and pension adjustments, alongside net income, company and peer group total shareholder return (TSR), a Company-Selected Measure, and a Tabular List of three to seven measures, for the PEO and the other NEOs on average.

The proposal would:

replace Compensation Actually Paid with Total Compensation Earned from the Earned Compensation Table, which the SEC believes more closely tracks the statutory phrase "executive compensation actually paid";

require only the company's cumulative TSR, eliminating net income, peer group TSR, and the Tabular List, and making a company-selected measure optional;

cover only the PEO and PFO, ending the averaging calculations; and

shorten the period covered to three years.

The required disclosure would compare the PEO's and PFO's Total Compensation Earned with the company's cumulative TSR over the three most recent fiscal years. The disclosure would continue to be excluded from incorporation by reference into other filings unless the company specifically incorporates it. EGCs would remain exempt, and SRCs would remain subject to the simplified disclosure requirements, although the Filer Status Proposal would exempt all non-accelerated filers.

Clawback Disclosure and the Form 10-K Check Boxes

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The proposal would eliminate both clawback-related cover page check boxes on Forms 10-K, 20-F, and 40-F. Disclosure would still be required, in the proxy statement and Form 10-K, if a restatement required recovery of erroneously awarded compensation or an outstanding balance remains. The requirement to explain why recovery was not required after a restatement would be removed, as would the requirement to break out, by executive, amounts for which recovery would be impracticable. The proposal does not change Exchange Act Rule 10D-1 or the listing standards that require companies to maintain a clawback policy.

Pay Ratio: U.S. Full-Time Employees, Every Five Years

Pay ratio disclosure would remain, but the employee population would change significantly. Today, companies identify the median employee from all U.S. and non-U.S. full-time, part-time, seasonal, and temporary workers, and must do so at least every three years. Under the proposal:

the median employee would be identified only from full-time employees in the United States and its territories, excluding seasonal and temporary workers;

the median employee would be identified at least once every five years, on a date within the last three months of the fiscal year;

annual total compensation for the PEO and the median employee would be determined using the Granted Compensation Table methodology;

for employees other than the PEO, companies could use reasonable methods, adjustments (including annualizing pay for full-time employees employed for less than the full year), and estimates; and

most of the detailed instructions, including the required disclosures about methodology, estimates, and sampling, would be eliminated.

The SEC notes that companies could continue using their existing processes for gathering and presenting pay ratio information. SRCs and EGCs would remain exempt.

Termination, Change-in-Control, and Golden Parachute Disclosure

The current requirement to quantify potential payments to each NEO under hypothetical termination and change-in-control scenarios would be eliminated. Companies would instead describe the material terms of written and unwritten arrangements providing for those payments to any person who served as PEO or PFO during the year, an approach similar to what SRCs provide today. Arrangements available generally to all salaried employees that do not discriminate in favor of executive officers

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could be omitted, and no further disclosure would be needed if the company has already satisfied the requirements in a Form 8-K Item 5.02 filing.

For merger proxies, the Golden Parachute Compensation Table would shrink from eight columns to four (Cash, Equity, Miscellaneous, and Total), with the current pension, perquisite, tax reimbursement, and other columns consolidated into the Miscellaneous column. Mandatory footnotes, the instructions requiring additional tables for new or revised arrangements, and the list of example material factors would be eliminated in favor of a materiality-based narrative, and the disclosure would cover only the PEO and PFO.

Director Compensation

The prescribed Director Compensation Table would be eliminated. Companies would describe the material aspects of their director compensation program, including separate amounts for cash and equity retainers for board, committee, chair, and other director roles. For each director, they would disclose (i) cash earned; (ii) amounts realized from stock vesting, option exercises, or transfers of awards for value; (iii) the number of outstanding stock and option awards and each award's grant date, vesting schedule, and other material terms; and (iv) other material compensation earned. The information could be presented in a table, narrative, or a combination. Separate disclosure of changes in pension value and above-market earnings on nonqualified deferred compensation would no longer be required. A director who is also an NEO would not need to have the same compensation reported twice.

Items Eliminated Entirely

In addition to the elimination of the Pension Benefits and Nonqualified Deferred Compensation tables, the proposal would eliminate Item 402(s), which requires discussion of compensation policies and practices as they relate to risk management, reasoning that Items 105 and 303 of Regulation S-K would continue to capture material compensation-related risks. It would also eliminate Item 402(x), the narrative and tabular disclosure about option grants made close in time to the release of material nonpublic information, which the SEC found had produced largely boilerplate disclosure.

Registration Statement Timing

Today, a company filing a long-form registration statement (such as Form S-1, S-4, S-11, or Form 10) early in its fiscal year must include Item 402 disclosure for the year just ended, while a Form S-3 filer can rely on its Form 10-K and proxy timeline of up to 120 days. The proposal would give long-form filers the same window, allowing them up to 120 days after fiscal year-end to provide Item 402 disclosure for the most recently completed fiscal year, subject to a pre-effective amendment if the registration statement would go effective after that deadline. As a result, the SEC would also eliminate

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Item 5.02(f) of Form 8-K and the related instructions for salary and bonus amounts that are not calculable at the time of filing.

Ripple Effects Beyond Item 402

Because the NEO definition is referenced elsewhere, the proposal's effects would extend well beyond the proxy statement's compensation section:

Form 8-K Item 5.02. Item 5.02(e) reports of new or amended compensatory arrangements are tied to NEOs, and so would generally be limited to the PEO and PFO. The effect on Item 5.02(b) departure reports would be smaller, because that item expressly covers certain other specified officers (such as president, principal operating officer, and principal accounting officer) whether or not they are NEOs.

Exhibit filing. Item 601(b)(10)(iii)(A) would continue to deem management contracts and compensatory plans with directors and NEOs material. Contracts with other executive officers, including those who are NEOs today, would need to be filed unless immaterial in amount or significance.

Beneficial ownership and related person transactions. Fewer executives would appear individually in the Item 403(b) beneficial ownership table, although group totals for directors and executive officers would continue. The release also notes that the narrower NEO group may reduce the number of situations in which companies can rely on the exception in Instruction 5.a to Item 404(a) for compensation reported under Item 402.

Potential Benefits for Public Companies

Meaningful Cost Savings

The SEC estimates ongoing compliance cost savings of approximately $244,000 per company per year on average, or about $1.64 billion in aggregate annually, against one-time transition costs that it estimates at 125 hours per company on average for the Form 10-K-related elements.

Disclosure That Matches How Boards Actually Decide Pay

The Granted Compensation Table's target-based presentation and the prior-year election for first-quarter equity grants are intended to let companies present compensation the way compensation committees set it. The SEC frames the goal as giving companies flexibility to present disclosure in a way that is consistent with how compensation programs are constructed today and that better represents the intention of boards and compensation committees.

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Key Considerations and Potential Tradeoffs

While the proposal offers meaningful relief, companies should not assume that less mandated disclosure will translate into less scrutiny. There are important practical and market realities to weigh:

Investor opposition. Some investors opposed reduced disclosure at the roundtable. Roundtable participants also described the current regime as "cumbersome and inefficient" but acknowledged that they know how to navigate it. Other commenters warned that less comprehensive disclosure risks creating an incentive for "pay padding" through benefits and perquisites detached from performance. Companies should expect large investors and proxy advisory firms to continue asking for information the rules no longer require, and say-on-pay votes remain the place where that pressure will show up.

Perquisite judgments will be second-guessed. A "reasonable and good faith" standard gives companies flexibility, but it is also a standard that can be tested after the fact by the SEC staff, plaintiffs, and investors. Investor commenters told the SEC that perquisite disclosure has a "sanitizing effect" by helping boards push back on excessive requests. A company that stops reporting a $400,000 security program will want a clear record of why that program is integrally and directly related to the executive's duties.

Target value can diverge from economic reality. Reporting equity at target can overstate the value of hard-to-achieve awards and understate awards likely to pay out above target.

Earned pay can spike. Because the Earned Compensation Table and the new pay-versus-performance disclosure recognize stock awards when they vest and options when they are exercised, multi-year awards may produce sharp increases in reported pay in a single year, with no earned pay reported for those awards in earlier years. The SEC acknowledged this concern and expects the Status of Equity Awards Table to provide context, but companies may need to explain resulting spikes in the CD&A or other contextual disclosure.

Less standardization. The SEC acknowledged that a more principles-based approach to director compensation could make comparisons across companies harder, and the same is likely true of the CD&A and the Miscellaneous column. Investors and data providers may push companies toward a de facto market format.

The proposal is only a proposal. The current rules remain applicable unless and until the amendments are adopted and become effective. Companies should not change their disclosure or perquisite determinations in anticipation of rules that may change before adoption.

What This Means to You

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The proposal would change not only what companies disclose about executive pay but who decides what is disclosed. Here is what companies should be thinking about now:

Plan for voluntary executive disclosure. Decisions to include additional executives voluntarily may send a message to investors. The release notes concerns that NEO status can send signals about succession, performance, and internal dynamics; once inclusion is voluntary, leaving out a highly paid president, chief operating officer, or business unit head may draw as many questions as including one. Companies should consider whether to adopt a consistent, disclosed approach and should anticipate questions from their larger shareholders.

Clarify responsibility for disclosure judgments. Reducing the required CD&A topics from seven to three and eliminating the 15 examples would leave drafting teams with less prescriptive guidance. Materiality judgments about what to include in the Miscellaneous column, what to say about divergences from target, and what to omit will require a process. Companies and their compensation committees should consider how those judgments will be made, by whom, and how they will be documented, much as audit committees and disclosure committees do for financial reporting.

Start building the perquisite record now, particularly for security. If the revised guidance is adopted, companies that conclude security or aircraft use is integrally and directly related to an executive's duties will be relying on a reasonable, good-faith determination. The strongest record will be contemporaneous: an independent security assessment, a board or committee determination tied to that assessment, and consistent treatment from year to year. Companies should also consider how the securities law determination will sit alongside the federal income tax treatment of the same benefit, since the proposal would allow companies to use tax values.

Do not discard historical data. The Earned and Granted Compensation Tables would cover three years (two for SRCs and EGCs), and the SEC has asked whether companies would need a phased-in transition. Vesting and exercise values are largely available from current Option Exercises and Stock Vested tables, but target grant-date values, defined benefit service cost by executive, and other inputs may need to be reconstructed for prior years. Similarly, companies should think about when to restart the new five-year pay ratio cycle and whether global payroll data collection can be wound down.

Note where your burden goes up. Companies that use adjusted earnings before interest, taxes, depreciation, and amortization (EBITDA), adjusted earnings per share (EPS), or other non-GAAP targets should prepare for the proposed reconciliation and explanation requirement, which would be new to the CD&A. EGCs with defined benefit plans and large accelerated filers subject to the new tagging requirements should plan for those changes as well.

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Consider a dry run. Recasting your most recent proxy statement in the proposed format is a practical way to identify judgment calls, data gaps, and how the new tables would present the company's compensation program.

Consider submitting a comment letter. The SEC is seeking public input on all aspects of the proposal, including whether a third NEO should be required, whether target valuation could distort pay decisions, whether executive security should be categorically excluded from perquisites and whether additional guidance should be provided on the application of the more flexible approach to perquisites to any notable or common situations, whether the pay ratio should use the Earned Compensation Table instead, and whether a transition period is needed for the new tables. Companies should consider sharing their views with the SEC on or before the January 19, 2027 comment deadline.

Monitor the broader reform effort. The proposal interacts directly with the Filer Status Proposal and is one of several pending SEC proposals that would significantly change ongoing public company reporting obligations. Companies should stay engaged as these rulemakings move forward.

Contact Us

If you have any questions, please do not hesitate to contact Steve Barrett, Robert Joseph, Andrew Spector, Maverick Lewis, or your Husch Blackwell attorney.

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