

MEMORANDUM

TO: File Nos. S7-21-21, S7-06-22, S7-09-22 and S7-20-22
FROM: Elizabeth Murphy, Division of Corporation Finance
RE: Meeting with Representatives of the Society for Corporate Governance
DATE: Sept. 9, 2022

On August 18, 2022, Michele Anderson and Elizabeth Murphy, Associate Directors in the Division of Corporation Finance, met with the following representatives of the Society for Corporate Governance: Darla Stuckey (Society President and CEO); Suzanne Rolon (Pfizer, Inc.); Keir Gumbs (Broadridge, Inc.); and Jared Brandman (National Vision Holdings). Among the topics discussed were the Commission's Proposing Releases on: Share Repurchase Disclosure Modernization; Modernization of Beneficial Ownership Reporting; Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure; and Substantial Implementation, Duplication, and Resubmission of Shareholder Proposals under Exchange Act Rule 14a-8.