

MEMORANDUM

To: File No. S7-24-19

From: Elliot Staffin, Special Counsel

Re: Telephone Conference with Representatives of PWYP-US, Earthrights International, Global Witness, Oxfam America, and ONE Campaign

Date: October 20, 2020

On October 20, 2020, Connor Raso from the Office of General Counsel, and Barry Summer and Elliot Staffin from the Division of Corporation Finance, had a telephone conference with the following representatives:

- Kathleen Brophy of PWYP-US;
- Michelle Harrison and Patrick Boyle of Earthrights International;
- Zorka Millin of Global Witness;
- Joseph Kraus of the ONE Campaign; and
- Isabel Munilla of Oxfam America.

The participants discussed, among other things, the SEC's proposed rule regarding disclosure of payments by resource extraction issuers.