

MEMORANDUM

TO: Comment File – Share Repurchase Disclosure Modernization

FROM: Kristina S. Wyatt
Division of Corporation Finance
U.S. Securities and Exchange Commission

DATE: December 29, 2021

RE: Meeting with HR Policy Association

On December 28, 2021, Erik Gerding, Deputy Director, Division of Corporation Finance, met with Chatrane Birbal and Andrew Maletz, representing the HR Policy Association. Also in attendance were Division of Corporation Finance counsel Deanna Virginio and Kristina Wyatt. Among the topics discussed was the Commission’s Proposing Releases on Share Repurchase Disclosure Modernization and Rule 10b5-1. The HR Policy Association expressed interest in writing comment letters on other matters listed on the Unified Regulatory Agenda.

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