



The DOJ has been busy and clawbacks have been a hot topic for the Biden Administration in the wake of several high profile bank failures. The intersection of these two topics is captured in [this Update](#) that we put out recently. Here's the intro from that Update:

"The U.S. Department of Justice (DOJ) on March 3, 2023, unveiled a [new pilot program](#) and announced several important updates to its Evaluation of Corporate Compliance Programs (ECCP) regarding corporate compensation incentives and clawbacks. These updates build on and clarify [Deputy Attorney General \(DAG\) Lisa Monaco's policy announcements](#) from September 2022 regarding corporate criminal enforcement (see [our Update](#) from when that originally happened).

This most recent guidance provides valuable insight into the DOJ's expectations regarding compliance-conscious compensation. However, implementing this guidance will require navigating complex issues of labor and employment law, both domestic and foreign, and will produce potentially significant shifts in corporate culture around compensation."

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