Using Generative AI to Retrieve and Analyze CEO Compensation Consultant Information from Public Corpora

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Abstract

We demonstrate how fine-tuning open-weight large language models can significantly improve the retrieval of information about compensation consultant engagement from company proxy statements, a task previously requiring costly manual collection in finance research and practice. We fine-tuned Gemma 3 12B-Instruct using parameter-efficient adapters (QLoRA) on 400 expert-labeled examples to identify consultant engagements and distinguish between retained advisers versus survey-only providers. Our fine-tuned model achieves 67.7% F1 score compared to 33.3% for the base model, a 103% improvement while reducing false positives by 68%. The approach addresses key challenges of processing non-standardized lengthy text data such as learning domain knowledge and requiring multi-hop reasoning. By trading throughput for fidelity through targeted chunking and conservative decoding, we provide a scalable, reproducible method for converting narrative-heavy filings into structured financial data, laying the foundation for a vertical agent capable of automating finance data-collection tasks.

1 Introduction

An increasing number of studies in economics and finance are investigating the impacts of generative artificial intelligence (GenAI) on finance research and practices [11, 14, 15, 23]. However, long-running debates have still persisted mainly because many questions hinge on information locked inside lengthy, legally dense filings that have historically required costly hand collection. To tackle this data collection challenge, this paper explores the potential benefits of GenAI that will aid in processing lengthy company documents at scale, particularly within compensation consulting and the analysis of CEO pay. Specifically, we fine-tuned Gemma 3 12B-Instruct, an open-weights large language model pretrained by Google, using parameter-efficient adapters (PEFT/LoRA) and 4-bit quantization (QLoRA), and show that domain adaptation with a set of quality training samples materially improves extraction quality relative to vanilla prompting [21].

Whereas early GenAI-in-finance work queried commercial LLM APIs or fine-tuned on readily available sentiment datasets to address relatively simple tasks (e.g., headline/news or earnings-text sentiment) [15, 18, 23], our contribution is to build expert-labeled training samples and then fine-tune an open model that extracts firm-level events from legal-financial documents at scale. This design achieves accuracy, reproducibility, and cost efficiency, and it directly addresses the practical challenges posed by long documents, heterogeneous formatting, and domain-specific distractors, thus laying the foundations for a domain-specific vertical agent system.

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Processing long, unstructured filings from the U.S. Securities and Exchange Commission (SEC) such as proxy statements can push LLMs to their limits. Because these filings are verbose narratives with heterogeneous formatting, identifying how compensation consultants are engaged could require *multi-hop reasoning* over dispersed evidence rather than a simple needle-in-a-haystack (NIAH) lookup. Another major challenge is mitigating the context rot, which refers to a broader degradation in the performance of the LLM as the input increases [26, 4]. To prioritize accuracy under these constraints, our pipeline trades throughput for fidelity: we adjust the size of the text chunks that target consultant-relevant phrases and paragraphs to shorten text spans while preserving sufficient context needed for multi-hop aggregation [25, 12, 22, 7]. In addition, references to compensation consultants are sometimes either overly complicated or implicit in the narrative, requiring the LLM to reason carefully through the context to derive the correct information. Accordingly, we scaffold inference with lightweight reasoning prompts while training the LLM to stabilize multi-step extraction in long contexts [24, 13].

Our fine-tuned model achieves 67.7% F1 score compared to 33.3% for the base model, a 103% improvement, while reducing false positives by 68%. These promising results underscore how LLMs can reshape data collection in finance by converting previously intractable, narrative-heavy filings into reliable structured signals. Beyond research, the approach scales to practical users of SEC disclosures—analysts, investors, and data providers—by pairing expert-curated labels with parameter-efficient fine-tuning (LoRA) and 4-bit quantized backbones (QLoRA) to achieve accuracy on modest hardware. In turn, adapting open models this way provides a cost-effective, reproducible path to extract finance-relevant information at scale from Electronic Data Gathering, Analysis, and Retrieval (EDGAR)'s full-text filings, opening new avenues for empirical investigation.

2   Research background

Finance research on executive pay has been examining the influence of compensation consultants for the last two decades [2, 19]. Early studies argued consultants act as independent experts, helping boards benchmark pay against market practices. However, other research emphasized conflicts of interest, suggesting consultants may encourage higher CEO pay to maintain favorable relationships with management [1, 19]. Combined with public outcry over skyrocketing CEO compensation, this argument on the collusion between compensation consultants and CEOs has shaped policy concerns, including SEC disclosure rules requiring firms to identify retained consultants. Yet empirical progress has been limited by the difficulty of systematically extracting consultant information from lengthy proxy statements.

Automated approaches are attractive, but prior work has rarely applied them to unstructured filings. To date, most finance research still relies on manual coding or small samples, restricting both scope and replication. For example, existing studies on CEO pay and the retention of compensation consultants often note that data were "hand-collected" without disclosing extraction criteria or coder protocols, or were sourced from proprietary databases such as the ISS Incentive Lab, which is limited in scope [3, 19].

Extracting necessary information from SEC filings such as proxy statements often requires even expert annotators to read carefully across long, heterogeneous narratives. Consequently, retrieving information about how firms retain compensation consultants goes beyond classic NER or synthetic NIAH tasks [8]. In addition, processing extremely long texts could sharply degrade performance as context grows.

3   Applications of GenAI to finance

Early finance applications explored LLMs to facilitate research workflows [15, 23], but their implementations relied primarily on prompt engineering or rudimentary fine-tuning with existing datasets and thus underutilized domain adaptation. There remains immense potential to combine recent performance improvements in GenAI with domain-specific expertise to advance research in finance.

Although state-of-the-art base LLMs are trained on vast corpora and exhibit strong general language skills, a base model still lacks domain-specific knowledge. For example, while a base LLM may successfully detect whether a firm relies on outside advisers, it can still confuse compensation consultants with auditors or legal counsel when these entities appear in proximity, leading to role

misclassification. Moreover, a firm may retain multiple consultants and non-consultants as well (e.g., natural persons or business associations), yet an LLM may fail to differentiate among distinct entities. Proxy statements may also list former consultants to provide additional context, which can distort the data collection process by introducing duplicate entries. Moreover, some firms may purchase proprietary compensation survey data from consultants without formally retaining them as outside advisers. Finally, broad pretraining can inject strong priors about well-known firms (e.g., Aon, Frederic W. Cook, Mercer, Willis Towers Watson), potentially amplifying *false positives* when names coincidentally match tokens in a filing [10].

Compounding these challenges, proxy statements often extend to hundreds of thousands of tokens. Even after cleaning and extracting relevant text chunks, a single proxy statement may still contain tens of thousands of tokens. The latest research shows that LLMs' long-context performance typically degrades as input length grows—well before the nominal context window is reached—due to positional effects and reduced effective context usage [17, 8, 16, 4]. Consistent with these findings, we observe that state-of-the-art API models struggle to return fully correct extractions when fed very large, information-dense contexts. This motivates our choice to chunk inputs and target consultant-relevant spans rather than relying on monolithic prompts with full proxy statement texts. In addition to efficient text chunking, model performance improves materially when it is *fine-tuned* for the specific structure and language of SEC filings.

4 Fine-tuning strategy

To maximize the accuracy of fine-tuning, we adopted a *fidelity-over-throughput* approach: adapt an open 12B instruction-tuned backbone (Gemma 3) with parameter-efficient tuning, strict context budgeting, and deterministic decoding. This design targets long, heterogeneous proxy statements without requiring large GPU clusters.

We fine-tuned the base model on domain-specific, expert-labeled excerpts, so it learns to map text patterns to adviser *roles* (retained adviser vs. survey-only provider vs. unrelated party) rather than merely memorizing names. Practically, we adopt parameter-efficient fine-tuning (LoRA/PEFT) and 4-bit quantization (QLoRA) to adapt the model on modest hardware while preserving accuracy [9, 5, 6]. This domain adaptation improves precision on consultant extraction and reduces spurious matches.

We assembled approximately 400 expert-labeled examples spanning diverse issuers, years, and layouts. Each item includes: (i) the excerpt bundle produced by the keyword pipeline; (ii) a filing-year header for temporal disambiguation; (iii) role-aware detailed instructions; and (iv) a compact gold extraction string (See Appendix B for the instruction prompt).

5 Analysis

The fine-tuned model significantly outperforms the base model across all evaluation metrics as illustrated in Table 1 (see Appendix C for the sample test results). Most notably, the fine-tuned model achieves 67.7% overall F1 score compared to 33.3% for the base model, a 103% relative improvement. This dramatic performance gain demonstrates the value of domain-specific adaptation for complex financial document processing tasks. By contrast, the surprisingly low score for the base model reveals that modern LLMs may not be sufficient to perform complicated and ambiguous QA tasks without additional training.

6 Limitations

To our knowledge, this study is among the first to apply LLM fine-tuning with reproducible code to finance research, particularly for extracting compensation-consultant data. Despite our novel contribution, there are notable limitations.

Compute and model size. Our experiments were constrained by commodity hardware. To fit training and inference on a personal desktop, we employed parameter-efficient fine-tuning (LoRA/PEFT) and 4-bit quantization (QLoRA) on a smaller open-weights LLM rather than exploring larger base models. This choice usefully demonstrates that meaningful gains are attainable without expensive APIs or multi-GPU clusters, but it also limited our ability to test higher-parameter variants or extensive

Table 1: Model Performance Comparison on Compensation Consultant Extraction

Metric Category	Model	Precision	Recall	F1-Score	Correct/Total
Overall	Base Model	0.265	0.446	0.333	173/388
	Fine-tuned	0.679	0.675	0.677	262/388
	Improvement	*+156%*	*+51%*	*+103%*	*+51%*
RET (Retained)	Base Model	0.273	0.604	0.376	131/217
	Fine-tuned	0.698	0.724	0.710	157/217
	Improvement	*+156%*	*+20%*	*+89%*	*+20%*
SURV (Survey)	Base Model	0.243	0.246	0.244	42/171
	Fine-tuned	0.652	0.614	0.633	105/171
	Improvement	*+168%*	*+150%*	*+159%*	*+150%*
Pooled	Base Model	0.310	0.506	0.385	176/348
	Fine-tuned	0.767	0.756	0.761	263/348
	Improvement	*+147%*	*+49%*	*+98%*	*+49%*

Notes: The table presents performance metrics for compensation consultant extraction on 146 proxy statement excerpts. **Overall** metrics evaluate instance-based performance where each consultant mention must be correctly identified and categorized (RET vs. SURV); 388 total gold labels. **Pooled** metrics combine both categories and evaluate only consultant name identification, ignoring categorization; 348 unique consultant instances after removing duplicates appearing in both categories within the same document. Higher pooled performance indicates the model effectively identifies consultant names but occasionally misclassifies engagement types. Improvement percentages are calculated as (Fine-tuned − Base) / Base × 100%.

ablations. With more robust compute, larger models and fuller sweeps could plausibly yield further improvements. Additional high-quality, expert-labeled training data would likewise improve accuracy.

Long-context management and context length mismatch between training and inference. Although *Gemma 3 12B-Instruct* supports a 128K-token window [21], we deliberately capped the model's effective context at roughly 2,100 tokens and processed each proxy statement in multiple chunks. Two considerations drove this decision. First, recent work documents degradation as input length grows—even within the nominal window—due to positional effects and reduced effective context usage ("context rot") [26, 4]. Second, our initial supervision consisted of paragraph-level examples; when supplied with much longer multi-paragraph inputs, the fine-tuned model exhibited higher error rates and occasional hallucinations, consistent with sensitivity to length discrepancies between training and evaluation. We gradually increased the mean length of training samples over time, but increasing the context window to the extent of several thousand tokens requires more dedicated GPU hardware. Consequently, we decided to prioritize fidelity over throughput at the cost of under-utilizing the model's maximum window. Future work should explore curriculum or scheduling strategies to bridge training–inference length gaps and improve long-context robustness [20].

Evaluation scope. Our evaluation emphasizes extraction fidelity for consultant identification and role labeling in DEF 14A filings; broader downstream analyses (e.g., heterogeneity across industries, dynamic effects with alternative identification strategies) are outside the scope. As the labeled corpus scales, we intend to expand evaluations and ablations to quantify trade-offs between context length, chunking strategy, and decoding settings on end-to-end research outcomes.

Finally, this work presents both positive and negative societal implications. On the positive side, our approach democratizes access to compensation consultant data that was previously available only through expensive proprietary databases or costly manual collection. However, automated extraction algorithms could produce misleading analyses or misguided policy implications if deployed without proper validation protocols.

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A   Screenshot of ChatGPT log where CHATGPT failed to follow the given instruction

ChatGPT 5, the latest LLM by OpenAI, was first given the same instruction as shown in Appendix B. We queried a series of text chunks. It continued to give the correct answers until it finally misclassified a consultant name after a succession of lengthy queries. When reminded of the rule, ChatGPT5 immediately acknowledged that it had failed to follow the instruction although it was aware of the rule; it says, it will "re"-apply the rule.

Figure 1: Excerpt from ChatGPT log illustrating acknowledgment of its mistake after a series of long-context queries.

B Prompt texts for training and retrieving information on compensation consultants

You are a meticulous reader of proxy-statement excerpts.task is to identify two categories of compensation consultants mentioned in the text:

1. RET: Consultants retained/engaged/selected/hired by the committee or management to advise on executive compensation (e.g., conduct peer group analysis, write up a report).

2. SURV: Consultants that provided compensation surveys and/or benchmarking/market data but were NOT explicitly retained/engaged. If there is a reference that a retained entity explicitly provides those, list it also under SURV.

INPUT FORMAT
You will receive a collection of excerpts separated by the token < < <EXCERPT_BREAK> > >.
Treat them as one document.

Strict Output Rules (CUSTOM FORMAT; NOT JSON):
1. Return two dictionaries, exactly in this order and with these keys: RET: 'Firm A', 'Firm B', SURV: 'Firm C'
2. When a firm appears under multiple names, output *only the LONGEST name* found in the whole document/excerpts.
3. List the firms in *alphabetical order* in each dictionary, with every firm enclosed in single quotes.
4. If no firms are found for a category, use 'NO_CONSULTANTS'. If a firm's name is not disclosed, use 'UNNAMED'.

IMPORTANT TIMING RULES:
- You will see a filing year at the start of each document. If a following excerpt/context contains no specific year, assume the information is current.
- Fiscal year: Proxy statement may refer to a fiscal year. A fiscal year is 12 months but starts later than January 1, depending on business needs or regulatory requirements. Thus, Fiscal Year 2022 could refer to a period in 2023.
- A consultant counts as currently retained if they were actively retained at the time of or during the filing year (or the immediately prior year), and had not been replaced before the filing date. If the proxy explicitly states a consultant was replaced, then only the last consultant should be counted even if the predecessor was retained in the filing or previous year.

TEMPORAL CONTEXT:
This document was filed in {filing_year}. Consultants retained in {filing_year} or {filing_year-1} are considered 'currently retained'.

Text to Analyze: {text}

C   Sample text for sanity check

Sample input text used in the sanity check and comparison of answers from the base and fine-tuned Gemma3 12B-Instruct (4-bit quantized).

The correct consultant names are written in green. The red herrings that managed to confuse the base model are marked in red.

INPUT:

Currently, Ms. Young is a senior consultant for TPH Asset Management, LLC, an affiliate of **Tudor, Pickering, Holt & Co.**

≪<EXCERPT_BREAK>≫

Committee meetings are attended by, for all or a portion of each meeting, not only the Committee members but also our Chief Executive Officer, our Vice President of Human Resources, an independent compensation consultant from **Compensia, Inc.**, an independent auditor from KPMG, and legal counsel from Fenwick West LLP.

≪<EXCERPT_BREAK>≫

In fulfilling its oversight responsibilities, the Audit Committee reviewed and discussed the Company's audited financial statements for the fiscal year ended December 31, 2006, with AMD management and Ernst & Young LLP, our independent registered public accounting firm. The Audit Committee also discussed with Ernst & Young LLP the matters required to be discussed by Statement on Auditing Standards No. 61 (Communications with Audit Committees, as amended by Statement on Auditing Standards No. 90 (Audit Committee Communications)). This included a discussion of the independent registered public accounting firm's judgments as to the quality, not just the acceptability, of the Company's accounting principles and such other matters that generally accepted auditing standards require to be discussed with the Audit Committee. The Audit Committee also received the written disclosures and the letter from Ernst & Young LLP required by Independence Standards Board Standard No. 1 (Independence Discussion with Audit Committees) and the Audit Committee discussed the independence of Ernst & Young LLP with that firm.

≪<EXCERPT_BREAK>≫

Ms. **Towers Watson** served on the Compensation and Human Resources Committee until her resignation from the Board on July 4, 2014, and Mr. Frederic Cook was appointed to the Compensation Committee effective January 1, 2020.

≪<EXCERPT_BREAK>≫

To assist the Committee in its review of named executive compensation, the Company's Human Resources Department, the Company's primary external compensation consultant, **Compensia, Inc.**, (retained both by management and by the Committee) as well as **Pearl, Meyer & Partners** (retained solely by the Committee for assistance relative to CEO compensation), provide compensation data compiled both from executive compensation surveys (including proprietary surveys conducted by **Radford Surveys + Consulting, Inc., Buck Consultants, LLC and Compensia, Inc.**), and annual reports and proxy statements from companies that the Committee selects as a "peer group" of technology companies for executive compensation analysis purposes.

ANSWER (BASE): RET: [Compensia, Inc., Pearl, Meyer & Partners, Tudor, Pickering, Holt & Co.], SURV: [Buck Consultants, LLC, Compensia, Inc., Radford Surveys + Consulting, Inc., Towers Watson]

ANSWER (FINE-TUNED): RET: [Compensia, Inc., Pearl, Meyer & Partners], SURV: [Buck Consultants, LLC, Compensia, Inc., Radford Surveys + Consulting, Inc.]

D Excerpts from proxy statements

Text chunks from proxy statements describing past consultants

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Prior to selecting Veritas as its independent advisor, the committee would from time to time retain Towers Watson (formerly Towers Perrin), an outside compensation and benefits consulting firm, regarding management pay, compensation design and other related matters.
In 2009, Towers Watson was engaged by the committee to attend certain meetings of the committee in order to provide insights on current executive compensation trends and practices. For 2009, the committee incurred fees of approximately $10,000 for Towers Watson's meeting attendance.
The use of Towers Watson by the committee did not preclude management from hiring the same firm. In 2009, Towers Watson was engaged by management to provide executive compensation advice and recommendations on the following: (Note: Only Veritas should be retrieved as the current consultant.)

The compensation and governance committee first engaged Mercer in 1999 and then again in 2004 and 2007 to review our existing compensation practices and suggest changes based on trends and developments impacting executive compensation and its best practices knowledge. In 2012, the committee engaged FTI Consulting, a nationally recognized compensation consultant specializing in the real estate industry, to review our executive and non-employee director compensation programs. It was favorably noted that our stockholders overwhelmingly approved our executive compensation program at the 2014 annual meeting. Holders of 77.7 million shares of our common stock, or over 97% of the total votes cast, voted FOR the advisory vote on executive compensation. (HIW, 2015) (Note: There is no information about its current compensation consultant since the filing year is 2015.)

Text chunks from proxy statements describing data-providing consultants

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The compensation surveys that we reviewed and summarized in the aggregate for the Committee in connection with establishing compensation for 2009 were published by: Carlson Dettmann Associates, Compensation Resources, Conference Board, Hewitt Associates, MACA, Mercer, Stanton Group (a division of Gallagher Benefits Services), Watson Wyatt Data Services and WorldAtWork.', 'In October 2006, FWC provided the Committee with a report on the primary components of our executive compensation program (base salary, annual bonus and longer-term incentives) (MGIC INVESTMENT, 2010) (Note: there are multiple consultants that only provided data, but there is no retained consultant given that the filing year is 2010. FWC is not the current consultant.)

After we developed this new retailer-only peer group with Watson Wyatt, Watson Wyatt provided the Committee with comparative executive compensation data it obtained from the proxy statements and other reports made public by these retailers.', 'The Committee charged Watson Wyatt with assisting it to meet the following primary objectives:', 'Additionally, the Committee reviewed executive compensation data from a broader base of companies that was aggregated in one or more of the compensation surveys obtained from Mercer Human Resource Consulting, Towers Perrin, Hewitt Associates and Watson Wyatt.', 'For fiscal 2008, the Committee worked with Watson Wyatt to develop a group of retailers that we believe is similarly situated to us and with whom we compete for talent.', 'In establishing executive compensation for fiscal 2008, the Committee subscribed to multiple compensation surveys and engaged Watson Wyatt Worldwide ("Watson Wyatt") to provide research, comparative compensation data and executive compensation program design expertise. (BIG, 2009)