

# Pay Equity Year in Review: What Employers Need to Know about New Legal Requirements and Trends

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- 2024 Legislative Updates
- Pay Equity Causes of Action and Defenses
- 2024 Case Law Trends and Insights
- Pay Equity Studies
- Looking Ahead to 2025

# 2024 Legislative Updates

# Where the Laws Started and Where They Are Going

- **Where the laws started...**
  - Pay secrecy laws
  - Salary history bans for private employers enacted in many states and localities (see Appendix 1)
  - Pay range disclosures in job postings and to applicants during interview process (see Appendix 2)
- **What we saw in 2023...**
  - Pay data disclosure requirements
  - Pay equity for contractors
- **What was new in 2024...**
  - A proliferation of pay range disclosure requirements
  - Additional pay data disclosure requirements

# State / Local Pay Scale Disclosure Requirements

- Requiring employers to provide pay scale for positions in job postings, after interviews, and/or on request

## All Job Postings:

- California
- Colorado
- Hawaii
- Illinois (effective January 1, 2025)
- Maryland
- Massachusetts (effective July 31, 2025)
- Minnesota (effective January 1, 2025)
- New Jersey (effective June 1, 2025)
- New York
- Vermont (effective July 1, 2025)
- Washington
- Washington, D.C.
- *And various cities and counties (including NYC)*

## To Applicants During Recruitment:

- Connecticut (earlier of employer extending offer or request from applicant)
- Nevada (after initial interview)
- Rhode Island (earlier of prior to discussion of compensation, or at interview if applicant requests)
- *And various cities and counties*

# Deep Dive: D.C. Pay Transparency (Effective June 30, 2024)

## Wage Transparency Omnibus Amendment of 2023 – Overview

- Applies to all non-governmental employers (employer that employs at least 1 employee in the District)
- Expands the requirements and prohibitions under the Wage Transparency Act, which until now only protected employee discussions and inquiries regarding their wages
- Requires employers to:
  - Provide minimum and maximum projected salary or hourly pay ranges on all job listings and position descriptions advertised
    - Applies to jobs, internal promotions, and transfers
    - Wage range is the lowest to the highest salary or hourly pay the employer in good faith believes it would pay
  - Disclose before the first interview the existence of any healthcare benefits a prospective employee may receive
- Prohibits employers from seeking a prospective employee's wage history and from screening prospective employees based on their wage history
- Anti-retaliation provisions

# D.C. Pay Transparency: Notice Requirement and Penalties

- New notice requirement:
  - Post a notice alerting employees to their rights under the amended Act “in a conspicuous place in at least one location where employees congregate.”
- No private right of action; the D.C. Attorney General shall have the power to investigate violations and bring civil actions against employers
- Penalties:
  - No grace period, initial warning, safe harbor, or other opportunity to cure first-time violations before the imposition of a civil fine
  - Fines
    - \$1,000 for first violation
    - \$5,000 for second violation
    - \$20,000 for each subsequent violation
  - Upon prevailing in court, the Attorney General shall be entitled to:
    - Reasonable attorneys’ fees and costs; and
    - Statutory penalties equal to any administrative penalties provided by law

## Wage Range Transparency Act

- Expands the requirements under Maryland's Equal Pay for Equal Work Law, which until now only required employer to disclose wage range upon applicant request
- Requires employers to provide:
  - Wage range for the position
    - Applies to any public or internal posting; if employers do not create a posting they must disclose the same information before discussion of compensation is held with the applicant or at any other time on request
    - Wage range is the lowest to the highest salary or hourly pay the employer in good faith believes it would pay
  - A general description of benefits and any other compensation offered for the position
- Prohibits employers from refusing to interview, hire, or employ an applicant, or promote or transfer an employee for requesting wage range or refusing to provide their wage history
- Anti-retaliation provisions



# Maryland Amendment: Record Requirements and Penalties

## Wage Range Transparency Act

- No separate notice requirement
- Record requirements:
  - Employers must keep a record of their compliance for at least 3 years after the position is filled; or if the position is not filled 3 years from the initial posting
- No private right of action, but applicants/employees may file a complaint with Maryland Commissioner of Labor and Industry
- Penalties:
  - Commissioner of Labor and Industry will issue an order compelling compliance for first violation
  - Commissioner may issue up to \$300 civil penalty per employee/application for second violation
  - Commissioner may escalate civil penalties up to \$600 for each subsequent violation that occurs within 3 years after a determination that a violation occurred

# DMV Focus – Pay Scale Comparisons



**District of Columbia:** lowest to the highest salary or hourly pay that the employer in good faith believes as of the time of the posting it would pay for the advertised position

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**Maryland:** Wage range is the lowest to the highest salary or hourly pay the employer in good faith believes it would pay; this may include reference to (1) any applicable pay scale; (2) any previously determined wage range; (3) the wage range of an individual holding a comparable position at the time of posting; or (4) the employer's budgeted amount for the position

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**Virginia:** No disclosure requirement yet (legislation passed but was vetoed)

*\*See Appendix for further detail*

# Explicit Remote Work Implications

## Law applies to *only* remote employees within the state

- California
- Colorado
- Maryland
- Washington

## Law applies to remote employees outside of the state

- Connecticut – out-of-state remote employees and applicants are covered if they are working for or reporting to an in-state employer
- Illinois – out-of-state remote postings are covered if the job reports to a supervisor, office, or work site in Illinois
- New York – out-of-state remote postings are covered if the job reports to a supervisor, office, or work site in New York
- Vermont – out-of-state remote postings are covered if the job will predominantly perform work for an office or work location that is physically located in Vermont

# Private Rights of Action

- **Connecticut**
- **Hawaii**
- **Nevada**
- **New York City**
- **Ohio – Cincinnati & Toledo**
- **Washington**
  - 50+ cases filed against employers alleging statutory penalties and fines for non-compliant job postings
  - **Status?**
    - \$3.8 Million Settlement in *Qdoba* case
    - *Aaron's LLC* dismissed without prejudice for lack of Article III standing
    - ***But Pizl vs. C.J. Of Washington, Inc.*** was certified as a class action in state court (currently stayed)

# Washington Update: State Supreme Court Will Weigh In

- The Washington State Supreme Court accepted a certified question in *Branson v. Washington Fine Wines & Spirits LLC*, No. 2:24-cv-00589-JHC (W.D. Wash) to interpret the meaning of the term “job applicant” under the Washington Equal Pay and Opportunities Act
- **Open Questions Washington’s Supreme Court Will Determine**
  - What must a plaintiff prove to be considered a “job applicant” within the meaning of RCW 49.58.110(4)?
  - Must a plaintiff be a “*bona fide*” applicant?

# Mandatory Pay Reporting

## United States

- **EEO-1**: Mandatory annual data collection that requires all private sector employers with 100 or more employees, and federal contractors with 50 or more employees meeting certain criteria, to submit workforce demographic data, including data by job category and sex and race or ethnicity, to the EEOC.
- **California**: Pay reporting to Civil Rights Department by job category, pay band, race, ethnicity, and sex for employers of 100 or more employees.
- **Illinois**: Pay reporting to Illinois Department of Labor by race, ethnicity, and sex for employers of 100 or more employees and that are subject to EEO-1 reporting. Also requires a written compliance statement.
- **Massachusetts (Effective 2025)**: Pay reporting to state by race, ethnicity, sex, and job category for employers of 100 or more employees and that are subject to EEO-1 reporting.

## Outside the US (Examples)

- **United Kingdom**: Public reporting on mean and median gender pay gap
- **British Columbia**: Public reporting on mean and median gender pay gap
- **EU Pay Transparency Directive (Effective 2026/2027)**: Annual reporting of pay gap for employee groups of “equal work” for employers with 250 employees or more (less frequently for smaller employers with 100+ employees).
  - Equal work = like work or “work of equal value”

# EU Pay Transparency Directive

- Requires implementation in each EU member state by June 2026
  - Directive sets minimum standards, each member state can “gold plate”
  - Purpose is to strengthen the principle of “equal pay for equal work”
- **Key elements**
  - **Pay transparency:** all employers operating in the EU, or employing persons based in the EU
  - **Pay reporting:** all employers operating in the EU who have at least 100 employees
- **Get ahead of this** – pay gaps which still exist in 2026 will be reportable
  1. Identify relevant EU jurisdictions
  2. Assess applicability against thresholds set by relevant implementing legislation
  3. Review existing worker categories (e.g. under an applicable collective bargaining agreement)
  4. Collect & Analyze data to conduct “equal value” analysis
  5. Remediate pay gaps which are not justified
- Consider issues of legal privilege to minimize risk
- Check contracts and policies
- Review hiring practices and train managers
- Consider overlapping ESG-reporting requirements (IFRS, CSRD, UN SDGs, etc.) to ensure all reports align

# Pay Equity Causes of Action and Defenses



# General Causes of Action

- Title VII and state law equivalents
  - Disparate treatment
  - Disparate impact
- Equal Pay Act and similar state laws
  - Liquidated damages
  - No intent required

# Equal Pay Act Defenses

## Federal Equal Pay Act

An employer can defeat a Federal Equal Pay Act claim by proving that the difference in pay for **substantially equal work** is due to a:

- “seniority system”
- “merit system”
- “system which measures earnings by quantity or quality of production”
- “differential based on any other factor other than sex”

29 U.S.C. 206(d)(1)

## California Equal Pay Act

An employer can defeat a Federal Equal Pay Act claim by proving that the difference in pay for **substantially similar** work is due to a:

- “seniority system”
- “merit system”
- “system that measures earnings by quantity or quality of production”
- “*bona fide* factor other than sex, such as education, training or experience. This factor shall apply only if the employer demonstrates that the factor is not based on or derived from a sex-based differential in compensation, is job related with respect to the position in question, and is consistent with business necessity”

CAL. LAB. CODE § 1197.5(a)(1)

# Issues: Remote vs. Hybrid vs. In-Person

- What about paying employees differently based on in-person work?
  - Employee who is entirely remote:
    - Remote in another state
    - Remote but in the same state as the office
- What about hybrid-work policy compliance, can you provide incentives / disincentives?
  - Salary
  - Bonuses
  - Performance considerations
- For consideration:
  - ADA issues
  - Equal Pay Act considerations: establishment
  - Logistics:
    - Job postings
    - Enforcement

# 2024 Case Law Trends and Insights

# Recent Pay Equity Litigation – Class Cases

- **Cahill v. Nike**, 2022 WL 19226181 (D. Or. 2022), *report and recommendation adopted*, 2023 WL 2587682 (D. Or. 2023) (equal pay class action not certified)
- **California Civil Rights Department v. Snap Inc.**, Case No. 24STCV15382 (Cal. Sup. Ct. 2024) (\$15 million settlement for 2,200 class members)
- **California Civil Rights Department v. Activision Blizzard Inc., et al.**, Case No. 24STCV15382 (Cal. Sup. Ct. 2023) (\$45,750,000 settlement)
- **Chen-Oster v. Goldman Sachs & Co.**, Case 1:10-cv-06950-AT-RWL (S.D.N.Y. 2023 ) (\$215 million settlement for 2,800 class members, inc. \$70 million for plaintiffs' firm)
- **DFEH v. Riot Games Inc.**, Case No. 18STCV03957 (Cal. Sup. Ct. 2022) (\$100 million settlement for 2,365 class members)
- **Ellis v. Google**, Case No. 08133832 (Cal. Sup. Ct. 2022) (\$118 million settlement for roughly 15,500 women (mostly software engineers))
- **Jewett v. Oracle**, Case No. 17-CIV-02669 (Cal. Sup. Ct. 2022) (equal pay class action certified, then decertified; see also OFCCP action dismissed on merits)
- **Jirek v. Astrazeneca Pharms. LP**, Case No. 21-6929 (N.D. Ill 2024) (granting conditional certification where plaintiff showed employer committed gender-based pay discrimination)
- **Jock v. Sterling Jewelers**, Case No. 08 Civ. 2875 (S.D.N.Y. 2022) and Case No. 11-16-00655-08 (AAA) (\$175 million settlement for 68,000 class members)
- **Rasmussen v. The Walt Disney Company, et al.**, Case No. 19STCV10974 (Cal. Sup. Ct. 2024) (\$43.25 million settlement for 14,000 class members) (motion for approval of settlement pending)

# Post *Dukes* Cases Not Certified or Decertified

- **Cahill v. Nike**, 2022 WL 19226181 (D. Or. 2022), *report and recommendation adopted*, 2023 WL 2587682 (D. Or. 2023) – 1,200 different job codes, 4,913 putative class members
- **Jewett v. Oracle**, Case No. 17-CIV-02669 (Ca. Sup. Ct. 2022) - 125 different job codes, 3,000 putative class members
- **Kassman v. KPMG**, 416 F.Supp.3d 252 (S.D.N.Y. 2018) – about five different jobs, 10,000 putative class members
- **Microsoft v. Moussouris**, 2018 WL 3328418 (W.D. Wash. 2018), *aff'd*, 799 F. App'x 459 (9th Cir. 2019) – 8,300 unique positions
- **Jones v. Nat'l Council of Young Men's Christian Ass'ns of the United States**, 34 F.Supp.3d 896 (N.D. Ill. 2014) – all Black employees, 85 class members
- **Howard v. CVS Caremark Corp.**, 2014 WL 11497794 (C.D. Cal. 2014) – two roles, 5,000 class members
- **Davis v. Cintas Corp.**, 717 F.3d 476 (6th Cir. 2013) – one type of role (entry-level sales representatives)
- **Bolden v. Walsh Const. Co.**, 688 F.3d 893 (7th Cir. 2012) – one type of role (laborers)

# Insights from a Pay Equity Class Action Litigator

- Performance Reviews
- Job Architecture
- Documents & Reports
- Prior Relevant Experience
- Salary Expectations
- Manager Training

# Pay Equity Studies



# At the Beginning

## A pay equity study is a:

- Self-critical analysis of pay outcomes at one point in time
- Used to identify unexplained gender/race/ethnicity-based disparities after accounting for legitimate factors
- *Pay Gap Analysis:* Generally reported as cents on the dollar difference across the company

## Before beginning, know this:

- Results are generally unpredictable
- Results will generally reveal some unexplained gaps
- Do not commit until leadership is committed

## Before beginning, consider this:

- Will a pay gap/cents on the dollar analysis also be done?
- Will one/both be conducted under the privilege?
- Will the results of one/both be made public?

## What pay will you study?

- Base salary/wages?
- Bonuses?
- Commissions?
- Equity?

**If you are intending to keep a pay analysis or audit privileged, be vigilant from the outset!**

- Attorney-client privilege: Confidential communication for purposes of Legal Advice
- Privilege does not protect ordinary business process
  - Examples: when there is no request for legal advice; legal acting as a business partner
- Always assume it will be challenged

# Are You Considering Self-Reported Pay Analysis?

- In response to employee activism and demands
- Shareholder activism / votes
- Board requests
- Other outside forces
- Related to ESG reporting requirements

# Shareholder Activism – Arjuna Capital

- Arjuna Capital: investment firm focused on sustainable and impact investing
- Publishes Racial & Gender Pay Scorecard
  - Analysis and ranking of performance and disclosure practices of public companies to identify industry leaders and laggards and provide recommendations to aid companies in disclosing their pay equity policies and practices
  - Goal:
    - “provide background on shareholder engagement, regulatory pressure, and the business case for pay equity, all of which have helped to fundamentally change the landscape for women and minorities”
    - “educate companies, investors, and the public to improve understanding of the racial and gender pay equity landscape”
  - Includes the 100 largest U.S. companies by market capitalization
  - Of 128 companies evaluated, only two, Target and Starbucks, received a perfect score (A+)
    - Strong pay equity performance
    - Comprehensive disclosure of all racial and gender pay gap metrics
  - 10% of companies received an “A” grade
  - 20% of companies received a “B” grade for their efforts to disclose and act on their racial and gender pay gaps
  - 43% of companies received an “F” grade for failure to disclose racial and gender pay gaps

# Considering Vendors to Help with Statistical Analysis?

- Labor economists v. off the shelf products
- Make sure you understand the product and its limitations
- Address data security concerns and commitments (will the vendor testify? Indemnify? Defend?)
- Master service agreements and statements of work should be sent to/approved by attorneys
- Require up front commitments regarding adherence to privilege protocols
- Understand data retention capabilities
- Subpoena concerns – notice and cooperation provisions

# Looking Ahead to 2025

# What's on the Horizon

- State v. Federal Enforcement
- Spotlight on Artificial Intelligence



# QUESTIONS?



# Appendices

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## Appendix 1 – State Salary History Bans

- Ban from inquiring about prior salary history candidates for hire before extending offer of employment
- Salary history bans for private employers enacted in:
  - Alabama
  - California
  - Colorado
  - Connecticut
  - Delaware
  - Hawaii
  - Illinois
  - Maine
  - Maryland
  - Massachusetts
  - Minnesota
  - Nevada
  - New Jersey
  - New York
  - Oregon
  - Puerto Rico
  - Rhode Island
  - Vermont
  - Washington
  - Washington, D.C.
  - & numerous localities

# Appendix 2 – State/Local - Pay Scale Disclosure Requirements

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See,,

# Appendix 2 – State/Local - Pay Scale Disclosure Requirements

State/Locality	Cite	Employer Defined	Required or Upon Request Only	Definition of Wage Range
Minnesota	<a href="#">SF 3852</a> ; <a href="#">Minn. Stat. Ann. § 181.173</a> Effective: January 1, 2025	30 or more employees at one or more locations in Minnesota	Required- All job postings	A "salary range" is the minimum and maximum annual salary or hourly range of compensation, based on the employer's good faith estimate at the time of the posting. The employer must also provide a general description of all benefits and other compensation, including any health or retirement benefits.
Nevada	<a href="#">SB 293</a>	"Employer" means a public or private employer in this State	Required, upon completion of an interview or application for promotion or transfer	"Wage or salary range or rate for a promotion or transfer to a new position" – but it is not defined; elsewhere in the law "Wage and Salary History" is defined as "the wages or salary paid to an applicant for employment by the current or former employer of the applicant. The terms includes...any compensation and benefits..."
New Jersey	<a href="#">SB 2310</a>	"Employer" means any person, company, corporation, firm, labor organization, or association which has 10 or more employees over 20 calendar weeks and does business, employs persons, or takes applications for employment within this State, including the State, any county or municipality, or any instrumentality thereof. The term shall include job placement and referral agencies and other employment agencies	Required – All job postings	Wage range not defined. An employer shall disclose in each posting for promotions, new jobs, and transfer opportunities that are advertised by the employer either externally or internally the hourly wage or salary, or a range of the hourly wage or salary, and a listing of benefits and other compensation programs for which the employee would be eligible within the employee's first 12 months of employment.

# Appendix 2 – State/Local - Pay Scale Disclosure Requirements

State/Locality	Cite	Employer Defined	Required or Upon Request Only	Definition of Wage Range
Jersey City, NJ	<a href="#">Jersey City Municipal Code § 148-4.1</a>  (see also <a href="#">Ordinance 22-026</a> and <a href="#">Ordinance 22-045</a> )	5 or more workers in Jersey City	Required- All job postings	The minimum and maximum range can extend from the lowest to the highest salary the employer in good faith believes at the time of posting it would pay for the advertised job, promotion, or transfer opportunity
New York	<a href="#">N.Y. Lab. Law § 194-b</a>  (new section added by A999)	4 or more employees	Required- All job postings posted through advertisement	(i) "the compensation or range of compensation" and (ii) "the job description ... if one exists" - "range of compensation" means "the minimum and maximum annual salary or hourly range of compensation for a job, promotion, or transfer opportunity that the employer in good faith believes to be accurate at the time of the posting of an advertisement for such opportunity"
New York, NY	<a href="#">Local Law 32; Amendment to Local Law 32; Comm. Human Rights Guidance</a>	4 or more employees, or one or more domestic workers, as long as at least one of those employees works in New York City	Required- All job postings (excepting temporary positions); does apply to fully remote or hybrid position, if the position can or will be performed in New York City, in whole or in part, whether from an office, in the field or remotely from the employee's home	Minimum and maximum annual base salary or hourly rate that the employer believes "in good faith," at the time of the posting, it is willing to pay for the advertised job

# Appendix 2 – State/Local - Pay Scale Disclosure Requirements



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Prior to joining Paul Hastings, Ms. Saba Murphy clerked for the Chief Justice of Maryland's Supreme Court. Ms. Saba Murphy also served as a judicial intern at the District Court for the District of Columbia for current Supreme Court Justice Ketanji Brown Jackson.

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