

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENTS

If you entered into a European Government Bond Transaction from January 1, 2005 through and including December 31, 2016 (“Class Period”), your rights may be affected by pending class action settlements and you may be entitled to a portion of the settlement fund.

This notice is to alert you to **new and additional** proposed settlements reached with UniCredit and Natixis in *In re European Government Bonds Antitrust Litigation*, No. 1:19-cv-2601 (VM) (S.D.N.Y.) and the creation of an additional settlement fund totaling \$27,000,000. Together with the prior settlements with JPMorgan and State Street (collectively with UniCredit and Natixis, the “Settling Defendants”), the settlement fund total is \$40,000,000. UniCredit and Natixis also agreed to provide cooperation in connection with Plaintiffs’ continued prosecution of claims against the non-settling Defendants. The settlements with UniCredit and Natixis will resolve all claims that were or could have been asserted against them in the action (as detailed in the respective settlements). UniCredit and Natixis deny any liability, fault, or wrongdoing. Litigation remains ongoing against the non-settling Defendants.

The capitalized terms in these paragraphs, as well as other capitalized terms, are explained or defined below or in the (i) Stipulation and Agreement of Settlement with JPMorgan Chase Bank, N.A., J.P. Morgan Securities PLC (f/k/a J.P. Morgan Securities Ltd.), and J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.); (ii) Stipulation and Agreement of Settlement with State Street Corporation and State Street Bank and Trust Company; (iii) Amended Stipulation and Agreement of Settlement with UniCredit Bank AG; and/or (iv) Amended Stipulation and Agreement of Settlement with Natixis S.A.

The United States District Court for the Southern District of New York (the “Court”) authorized this notice. The Court appointed the lawyers listed below to represent the Settlement Class:

Vincent Briganti
LOWEY DANNENBERG, P.C.
44 S. Broadway, Suite 1100
White Plains, NY 10601

Kristen M. Anderson
SCOTT+SCOTT ATTORNEYS AT
LAW LLP
230 Park Avenue, 17th Floor
New York, NY 10169

Gregory S. Ascioffa
DICELLO LEVITT LLP
485 Lexington Avenue, Suite 1001
New York, NY 10017

Todd A. Seaver
BERMAN TABACCO
425 California Street, Suite 2300
San Francisco, CA 94104

Who Is a Member of the Settlement Class?

Subject to certain exceptions, the Settlement Class consists of all persons that purchased or

sold one or more European Government Bond(s) in the United States directly from a Defendant, Deutsche Bank, or Rabobank (or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant, Deutsche Bank, or Rabobank, or any of their alleged co-conspirators) from January 1, 2005 through December 31, 2016.

“European Government Bonds” means euro-denominated sovereign debt or bonds issued by European governments (*e.g.*, Austria, Belgium, Cyprus, Estonia, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Malta, the Netherlands, Portugal, Slovakia, Slovenia, and Spain).

If you are not sure if you are included in the Settlement Class, you can get more information, by visiting www.EuropeanGovernmentBondsSettlement.com or by calling toll-free 1-877-883-7336.

What Is This Lawsuit About?

Plaintiffs allege that Defendants, including UniCredit, Natixis, JPMorgan, and State Street, conspired to fix the prices of European Government Bonds in the primary and/or secondary markets.

In the primary market, Plaintiffs allege that Defendants furthered this conspiracy by agreeing to artificially inflate European Government Bond prices at auction through a process known as “overbidding” and to otherwise coordinate their bidding strategies, thereby outbidding rivals and raising the benchmark for resale in the secondary market.

In the secondary market, Plaintiffs allege that Defendants, in control of the supply of newly issued European Government Bonds, agreed to fix bid-ask spreads. This includes, Plaintiffs allege, agreeing on higher prices to charge investors for European Government Bonds. Defendants are alleged to have coordinated this scheme via online chatroom communications, where they explicitly fixed prices and bids and exchanged other sensitive, confidential information necessary to carry out the scheme.

Plaintiffs allege they were injured by these artificially inflated prices and fixed bid-ask spreads each time they transacted in European Government Bonds directly with a Defendant (or Defendant affiliate) and therefore pursue claims under the Sherman Act for themselves and on behalf of the class.

What Do the Settlements Provide?

To settle the claims against them (as detailed in the respective settlements), JPMorgan agreed to pay a total of \$13,000,000, UniCredit agreed to pay a total of \$13,000,000, and Natixis agreed to pay a total of \$14,000,000. Settling Defendants also agreed to provide cooperation in connection with Plaintiffs’ continued prosecution of claims against the non-settling Defendants. If the Settlements are approved, the Settlement Amount, plus interest earned and less any Taxes, Notice and Administration Costs, Court-awarded attorneys’ fees and Litigation Expenses, any service awards for Plaintiffs, and any other expenses approved by the Court will

be divided among all Settlement Class Members who submit valid claim forms. More information about the specific terms of the settlements can be found by visiting www.EuropeanGovernmentBondsSettlement.com or by calling toll-free 1-877-883-7336.

Will I Get a Payment?

If you are a member of the Settlement Class and do not opt out, you will be eligible for a payment under the settlements if you file a valid claim form. Claim forms must be submitted online at www.EuropeanGovernmentBondsSettlement.com on or before 11:59 p.m. Eastern time on **January 29, 2024 OR** mailed so that they are received by **January 29, 2024**.

What Are My Rights?

If you are a member of the Settlement Class and do not opt out, you will release certain legal rights against Settling Defendants and the other Released Parties, as explained in the Court's detailed notice and the Settlement agreements, which are available at www.EuropeanGovernmentBondsSettlement.com. If you do not want to be a member of the Settlement Class with respect to these Settlements, you must opt out by **November 13, 2023**. You may object to these settlements, the Distribution Plan, application for an award of attorneys' fees and Litigation Expenses, and/or service awards for Plaintiffs by **November 13, 2023**. If you did not receive this notice packet before November 13, 2023, your deadline to opt out or object is **January 22, 2024**. Information on how to opt out or object is contained in the Court's detailed notice, which is available at www.EuropeanGovernmentBondsSettlement.com.

When Is the Settlement Hearing?

The Court will hold a Settlement Hearing at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 15B, New York, NY 10007, on **February 23, 2024 at 10:00 a.m.** to consider whether to finally approve the settlements, Distribution Plan, application for an award of attorneys' fees and Litigation Expenses, and any service awards for Plaintiffs. You or your lawyer may ask to appear and speak at the hearing at your own expense, but you do not have to.

**For more information, call toll-free 1-877-883-7336 or visit
www.EuropeanGovernmentBondsSettlement.com.**

******* Please do not call the Court or the Clerk of the Court
for information about the settlements. *******