

**Class Action Summary**

**Gold Commodities Canada**  
**Antitrust Class Action Settlement**

***This is not an official Court Notice. Information contained in this Summary is subject to change.***

If you or your entity transacted in Gold Market Instruments in whole or in part in Canada from **January 1, 2004 through March 19, 2014**, you may be entitled to participate in the **\$3,350,360.95 (CDN)** recovered ***thus far*** in class action settlements.

**Filing Deadline: No Claim Forms are available at this time; the Court will determine the deadline at a later date.**

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**Eligible Class Members:** All persons or entities who or which, from January 1, 2004 through March 19, 2014, transacted in a "Gold Market Instrument" (defined below) in whole or in part in Canada, either directly or indirectly through an intermediary, and/or purchased or otherwise participated in an investment or equity fund, mutual fund, hedge fund, pension fund or any other investment vehicle that transacted in a Gold Market Instrument. Investment Vehicles means any investment company or pooled investment fund, including, but not limited to, mutual fund families, exchange-traded funds, fund of funds and hedge funds, in which a Defendant has or may have a direct or indirect interest, or as to which its affiliates may act as an investment advisor, but of which a Defendant or its respective affiliates is not a majority owner or does not hold a majority beneficial interest.

**Definition of "Gold Market Instruments":** A Gold Market Instrument includes gold bullion or gold bullion coins, gold futures contracts traded on an exchange operated in Canada, shares in gold ETFs, gold call options traded on an exchange operated in Canada, gold put options traded on an exchange operated in Canada, over-the-counter gold spot or forward transactions or gold call options, over-the-counter gold put options, leases for gold, and gold certificates.

**Defendants:** The Defendants include: 1) Deutsche Bank AG, Deutsche Bank Securities Limited and Deutsche Bank Securities, Inc. (collectively, "Deutsche"); and 2) the "Non-Settling Defendants" including: a) Barclays Bank PLC, Barclays Capital Canada Inc., Barclays Capital Inc., Barclay Capital PLC and Barclays PLC; b) The Bank of Nova Scotia; c) Banque UBS (Canada); d) HSBC Bank Canada, HSBC Bank PLC, HSBC Holdings PLC, HSBC Securities (Canada) Inc., HSBC Securities (USA) Inc. and HSBC USA Inc.; e) La Banque de Nouvelle-Ecosse; f) London Gold Market Fixing Ltd.; g) Scotia Capital (USA) Inc. and ScotiaMocatta; h) SG Americas Securities, LLC, Société Générale, Société Générale SA and Société Générale (Canada); and i) UBS AG, UBS Bank (Canada) and UBS Securities LLC.

**Case History:** In or about 2015, civil claims were filed in Canada alleging the Defendants participated in a conspiracy to fix, maintain, increase, decrease, control and/or unreasonably enhance the price of gold in the gold market. At this time, the class has entered into a settlement with Deutsche in the amount of \$3,350,360.95 (CDN). This settlement is pending Court approval and a distribution protocol will also be submitted for Court approval at a later date. The litigation is currently ongoing against the Non-Settling Defendants and it is possible that additional funds may become available to the class if any additional settlements are reached.

**Class Counsel or the Settlement Administrator may be contacted for additional settlement information.**

**You also may visit the court approved website. *Please understand that you have the right to file on your own.***

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**The Services FRS Provides:** Financial Recovery Strategies (FRS) is a class action claims management consultant; we are not a court appointed claims administrator or class counsel. If you hire FRS, FRS will work within your guidelines to manage the claims process: FRS will notify you when we believe that you may be eligible to participate in valuable settlements; we will take action to assure that all of your eligible business units (e.g., subsidiaries, divisions, acquisitions and divestitures) are included in the claims process; to reduce the support needed from your in-house staff, FRS will provide advice on what, if any, documents need to be collected and maintained, and, when requested, will assist in that effort; when required documents are not available or are too burdensome to collect, FRS will attempt to develop innovative alternatives to satisfy documentation requirements and then negotiate on your behalf to obtain approval of those alternatives; FRS will prepare, assemble and submit your claim package, and manage it throughout the claims processing phase, including working with you to address any concerns or questions the claims administrator may have; FRS will provide regular updates on the recovery process; FRS will review your payment to assure that it has not been under calculated; and FRS will follow up with you to assure that your recovery check is deposited. FRS's recovery specialists are always available to answer any questions you may have.

**How to Retain FRS:** If you wish to hire FRS to file and manage a claim on your behalf, you must return a signed copy of an Authorization Agreement. Before doing so, it is important that you understand its terms and make sure that your basic information at the top of the page is correct.