

CLASS ACTION SUMMARY

**SIBOR AND SOR PURCHASER
ANTITRUST CLASS ACTION SETTLEMENTS****DID YOUR BUSINESS PURCHASE, SELL, HOLD,
TRADE OR OTHERWISE HAVE ANY INTEREST
IN SIBOR AND/OR SOR PRODUCTS?****YOU MAY BE ELIGIBLE TO RECOVER MONEY!****Eligible Class Members:**

All persons and entities (excluding the United States Government) who or which, from January 1, 2007 through December 31, 2011 (the "Class Period"), purchased, sold, held, traded, or otherwise had any interest in Singapore Interbank Offered Rate- ("SIBOR") and/or Singapore Swap Offer Rate ("SOR")-Based Derivatives. Investment Vehicles (i.e., any investment company, separately managed account or pooled investment fund including, but not limited to, mutual fund families, exchange-traded funds, fund of funds, hedge funds and employee benefit plans) are not excluded from the Class solely based on being deemed to be a "Defendant" or an affiliate or subsidiary of a Defendant. To the extent that any Defendant or any entity that might be deemed to be an affiliate or subsidiary of a Defendant, managed or advised, or directly or indirectly held a beneficial interest in said Investment Vehicle during the Class Period, that beneficial interest in the Investment Vehicle is excluded from the Class.

**Definition of "SIBOR- and/or SOR-
Based Derivatives":**

SIBOR- and/or SOR-Based Derivatives means (i) a SIBOR- and/or SOR-based interest rate swap entered into by a U.S. Person, or by a Person from or through a location within the U.S.; (ii) an option on a SIBOR- and/or a SOR-based interest rate swap ("swaption") entered into by a U.S. Person, or by a Person from or through a location within the U.S.; (iii) a Singapore Dollar currency forward agreement entered into by a U.S. Person, or by a Person from or through a location within the U.S.; (iv) a SIBOR- and/or SOR-based forward rate agreement entered into by a U.S. Person, or by a Person from or through a location within the U.S.; and/or (v) a SIBOR- and/or SOR-based foreign exchange swap entered into by a U.S. Person, or by a Person from or through a location within the U.S.

"Defendants":

The Defendants include:

Citibank, N.A. and Citigroup Inc. (collectively, "Citi"); Bank of America, N.A. ("BOA"); JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. ("JPMorgan"); The Royal Bank of Scotland plc (n/k/a NatWest Markets plc) ("RBS"); UBS AG ("UBS"); ING Bank N.V. ("ING"); BNP Paribas, S.A. ("BNPP"); The Oversea-Chinese Banking Corporation Ltd. ("OCBC"); Barclays Bank PLC ("Barclays"); Deutsche Bank AG ("Deutsche"); Credit Agricole Corporate and Investment Bank ("CACIB"); Credit Suisse AG ("Credit Suisse"); DBS Bank Ltd. ("DBS"); United Overseas Bank Limited ("UOB"); Standard Chartered Bank ("SCB"); Australia and New Zealand Banking Group Ltd. ("ANZ"); MUFG Bank Ltd. (f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd.) ("MUFG"); The Hongkong and Shanghai Banking Corporation Limited ("HSBC"); and Commerzbank AG ("Commerzbank").

ELIGIBILITY SUMMARY

*Fund Amount:
\$155.458 Million

*Purchase Dates:
**January 1, 2007 -
December 31, 2011**

*Filing Deadline:
December 29, 2022

**See "case history" section for specific dates
and fund amounts.*

**THIS IS NOT AN OFFICIAL COURT NOTICE.
INFORMATION CONTAINED IN THIS SUMMARY IS SUBJECT TO CHANGE.**

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. The services that FRS provides include the following: (i) notifying you when we believe that you may be eligible to participate in settlements likely to be valuable to you; (ii) endeavoring to enhance the likelihood that all of your eligible business units (e.g., subsidiaries, divisions, acquisitions and divestitures) are included in the claims process; (iii) to reduce the support needed from your in-house staff, providing advice on what, if any, documents need to be collected and maintained, and, when requested, assisting in that effort; (iv) when required documents are not available or are too burdensome to collect, attempting to develop innovative alternatives to satisfy documentation requirements and striving to obtain approval of those alternatives; (v) preparing, assembling and submitting your claim package, and managing it throughout the claims processing phase, including working with you to address any concerns or questions claims administrators may have; (vi) providing regular updates on the recovery process; (vii) reviewing your payment to assure that it has not been under calculated; and (viii) following 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 Claims Management Agreement and a signed Authority to File and Manage Claims. Before doing so, it is important that you understand their terms and make sure that all information about you is correct.

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Case History

Commencing in 2017, a lawsuit was filed alleging that several of the Defendants manipulated, aided and abetted in the manipulation of, conspired, colluded and/or engaged in racketeering activities to manipulate the SIBOR, SOR and the prices of SIBOR- and SOR-Based Derivatives in violation of federal antitrust and state laws. Since then, the class has entered into an agreement with JPMorgan (\$10.989 million), Citi (\$9.99 million), HSBC (\$11 million), Deutsche (\$11 million), Credit Suisse (\$10.989 million), ING (\$10.49 million) and the remaining Defendants (including ANZ, BOA, Barclays, BNPP, Commerzbank, CACIB, RBS, UBS, DBS, MUFG, OCBC, SCB and UOB for \$91 million) in the aggregate amount of \$155.458 million. These settlements are pending final approval. The settlement funds (less any expenses and attorney's fees) will be made available to Eligible Class Members after the completion of the claims process. The filing deadline is December 29, 2022.

Class Counsel or the Settlement Administrator may be contacted for additional settlement information. You also may visit the Court-approved website, once one is made available. Please understand that you have the right to file on your own. To learn more about our services, visit www.FRSCO.com.

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