

SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

If you entered into a Gilt Bond Transaction with one or more Defendants from January 1, 2009 to December 31, 2013 (“Class Period”), your rights may be affected by a pending class action settlement.

This notice is to alert you to a proposed settlement reached with Citigroup Global Markets Limited and Citigroup Global Markets Inc., HSBC Bank plc, HSBC Securities (USA) Inc., RBC Europe Limited and RBC Capital Markets, LLC, Morgan Stanley & Co., International Plc, and Morgan Stanley & Co. LLC (collectively, “Settling Defendants”) in *Oklahoma Firefighters Pension & Retirement System v. Deutsche Bank AG, et al.*, Case No. 1:23-cv-05095 (S.D.N.Y.). Settling Defendants agreed to (i) pay \$12,000,000 into a settlement fund plus notice and administration costs up to \$1,000,000; and (ii) provide cooperation in connection with Plaintiff’s continued prosecution of claims against the non-settling defendants (Deutsche Bank Aktiengesellschaft (f/k/a Deutsche Bank AG), and Deutsche Bank Securities Inc. (together, “Deutsche Bank”). The settlement will resolve the claim against Settling Defendants in the action. Settling Defendants deny any liability, fault, or wrongdoing in connection with the allegations in the action. Litigation remains ongoing against Deutsche Bank.

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

Patrick J. Coughlin
Scott+Scott Attorneys at Law LLP
600 W. Broadway, Suite 3300
San Diego, CA 92101
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Who Is a Settlement Class Member?

Subject to certain exceptions, the Settlement Class consists of all persons or entities who entered into Gilt Bond Transactions in the United States directly with a defendant (or a direct or indirect parent, subsidiary, affiliate, or division of a defendant, or any of their alleged co-conspirators) from January 1, 2009 to December 31, 2013. “Gilt Bond Transactions” means any and all transactions involving British pound sterling-denominated United Kingdom government bonds. This includes trades in Gilts, UK Treasury Bills, UK Treasury Strips, UK Treasury Coupons, UK Treasury Inflation Bonds, Gilt Futures, Gilt Options on Futures, Gilt OTC Options, and Gilt Asset Swaps.

If you are not sure if you are included in the Settlement Class, you can get more information by visiting www.GiltBondSettlement.com or by calling toll-free 1-877-354-3915 (if calling from outside the United States or Canada, call 1-414-961-6555).

What Is This Lawsuit About?

Plaintiff alleges that Defendants, a group of banks serving as primary dealers (“Gilt-edged Market Makers” or “GEMMs”) in Gilt Bonds, as well as their relevant broker-dealer affiliates, entered an unlawful conspiracy to illegally share proprietary and confidential information in real-time through private chatrooms, including details on pricing and other aspects of their trading strategies, to raise, depress, fix, peg, or stabilize the price of Gilt Bonds, one of the world’s premier debt instruments.

What Does the Settlement Provide?

To resolve all Released Claims against them, Settling Defendants agreed to pay \$12,000,000 plus notice and administration costs up to \$1,000,000 and produce documents, including chatroom communications and transaction data (“Cooperation Material”), that Plaintiff can use in its continued prosecution of claims against the non-settling Defendant, Deutsche Bank. In its order dismissing the Complaint, the Court noted the Complaint lacked chatroom communications, which may provide direct or circumstantial evidence of a price-fixing conspiracy. Plaintiff expects to use the Cooperation Materials from Settling Defendants to bolster the allegations against Deutsche Bank in an amended complaint.

Will I Get a Payment?

If you are a Settlement Class Member and do not opt out, you will be eligible for a payment under the settlement if you file a claim form (“Claim”). At this time, it is unknown how much each Settlement Class Member who submits a valid claim will receive. Payments will be based on a Plan of Distribution; the proposed plan will be available for review at the website. You may also get more information at www.GiltBondSettlement.com or by calling toll-free at 1-877-354-3915.

Claims must be submitted online at www.GiltBondSettlement.com or received by mail on or before **DECEMBER 23, 2025**.

What Are My Rights?

If you are a Settlement Class Member and do not opt out, you will release certain legal rights against Settling Defendants and the other Released Defendant Persons, as explained in the Court’s detailed notice and the settlement agreement, which are available at www.GiltBondSettlement.com. If you want to keep your right to sue the Settling Defendants about the claims in this lawsuit and do not want to be a Settlement Class Member in this Settlement, you must opt out by **DECEMBER 23, 2025**.

You may object to the settlement, Plan of Distribution, and/or application for an award of up to \$500,000 in litigation expenses by **DECEMBER 23, 2025**.

Information on how to opt out or object is contained in the Court’s detailed notice, which is available at www.GiltBondSettlement.com.

When Is the Fairness Hearing?

The Court will hold a fairness hearing at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St, Courtroom 14A, New York, NY 10007, on **JANUARY 22, 2026 at 2:30 p.m. Eastern Time** to consider whether to finally approve the settlement, Plan of Distribution, and request for litigation expenses. 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 1-877-354-3915 (if calling from outside the United States or Canada, call 1-414-961-6555) or visit www.GiltBondSettlement.com.

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