

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OKLAHOMA FIREFIGHTERS PENSION
AND RETIREMENT SYSTEM, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

DEUTSCHE BANK
AKTIENGESELLSCHAFT (f/k/a Deutsche
Bank AG); DEUTSCHE BANK
SECURITIES INC.; CITIGROUP GLOBAL
MARKETS LIMITED; CITIGROUP
GLOBAL MARKETS INC.; RBC EUROPE
LIMITED; RBC CAPITAL MARKETS LLC;
HSBC BANK PLC; HSBC SECURITIES
(USA) INC.; MORGAN STANLEY & CO.
INTERNATIONAL PLC; and MORGAN
STANLEY & CO. LLC,

Defendants.

Case No. 1:23-cv-05095

The Honorable John G. Koeltl

PLAN OF ALLOCATION

ADMINISTRATIVE PROCEDURES

For purposes of this Plan of Allocation, the Net Settlement Fund means the Settlement Fund (\$12,000,000 plus any interest earned thereon) less (i) Taxes; (ii) Notice and Administration Costs exceeding \$1,000,000; (iii) any Litigation Expenses awarded by the Court; and (iv) any other costs or fees approved by the Court.

Subject to Court approval, the proceeds of the Net Settlement Fund will be paid to

Authorized Claimants who or which submitted Claims on or before the claims submission deadline, which is TBD at the time of this writing. Please check the Settlement Website (<https://giltbondsettlement.com/>) for updates.

Following receipt of each Claim, the Claims Administrator will issue a confirmation receipt to the person or entity filing the Claim (a “Claimant”). The Claims Administrator will review each Claim to determine whether the Claimant is a Settlement Class Member. Claims submitted by claimants who or which are not Settlement Class Members will be rejected.

The Claims Administrator will review each Claim to determine whether the Claim is submitted in accordance with the Settlement, this Plan of Allocation, Orders of the Court, and Claim Submission Instructions, all of which are available on the Settlement Website. Claims that are not submitted in accordance with the Settlement, this Plan of Allocation, Orders of the Court, and Claim Submission Instructions will be rejected.

CALCULATION OF TRANSACTION CLAIM AMOUNTS

The Settlement Classes are defined as follows: all persons or entities (1) who entered into a Gilt Bond Transaction in the United States directly with a Defendant (or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant) from January 1, 2009 to December 31, 2013; and/or (2) who are in the United States and entered into a Gilt Bond Transaction futures or options on futures contract on the London International Financial Futures and Options Exchange (“LIFFE”) from January 1, 2009 to December 31, 2013.

Accordingly, the transactions that are eligible under the Settlement are all Gilt Bond Transactions that occurred in the United States directly with Defendants (or a direct or indirect parent, subsidiary, affiliate, or division of a Defendant) from January 1, 2009, to December 31, 2013, and Gilt Bond Transaction futures or options on futures contracts on the LIFFE entered into

by persons or entities in the United States from January 1, 2009, to December 31, 2013.

Gilt Bond Transactions are transactions involving British pound sterling-denominated United Kingdom (“UK”) government bonds, including Gilts, Gilt Futures, Options on Gilt Futures (exchange), Gilt Options (over-the-counter), and Gilt Asset Swaps. For purposes of the Plan of Allocation, UK Treasury Bills, UK Treasury Strips, UK Treasury Coupons, UK Treasury Inflation Bonds are considered Gilts.

Under the Plan of Allocation, Gilt Bond Transactions are categorized by instrument and then further categorized based on the remaining years until maturity when purchased or sold. For each duration bucket, a “Risk Number,” which is a widely accepted measure of the sensitivity of a bond’s price to changes in yield, has been calculated. A Multiplier based on the Risk Number is assigned in the Allocation Tables below.

For each claim, the Claims Administrator will multiply the net prices (the notional value of an instrument multiplied by the purchase or sale price, not including any accrued interest purchased or sold) for all the eligible Gilt Bond Transactions in each category by the corresponding Multiplier and sum those amounts to obtain the Authorized Claimant’s Individual Transaction Claim Amount. ***The Individual Transaction Claim Amount is not the Authorized Claimant’s payment amount.***

PRO RATA SHARE DETERMINATIONS

The Claims Administrator will calculate each Authorized Claimant’s *pro rata* share of the Net Settlement Fund as follows:

$$\text{Pro Rata Share} = \frac{\text{Individual Transaction Claim Amount}}{\text{Total of All Authorized Claimants' Transaction Claim Amounts}}$$

ALTERNATIVE MINIMUM PAYMENT

In consultation with Plaintiffs' Counsel, the Claims Administrator will determine whether an alternative minimum payment should be paid to Authorized Claimants where it is reasonably determined that the cost of administering the claim would exceed the value of the claim. The alternative minimum payment amount would be a set amount for all such Authorized Claimants.

COURT REVIEW

All proceedings with respect to the administration, processing, and determination of claims, and the determinations of all controversies relating thereto, including disputed questions of law and fact with respect to the validity of Claims, shall be subject to the jurisdiction of the Court. To the extent the Claims Administrator rejects a Claim, either in whole or in part, the Claimant whose Claim was rejected will be advised in writing of the reasons for the rejection and such claimant will have the opportunity to seek Court review of the Claims Administrator's rejection. All Claimants expressly waive trial by jury (to the extent any such right may exist) and any right of appeal or review with respect to the Court's determination.

DISTRIBUTION

Following the Effective Date, and after the Claims Administrator has determined the amounts of all Authorized Claimants' Claims, Plaintiffs' Counsel will apply to the Court for a Class Distribution Order. Any interest earned on the Settlement Fund that becomes part of the Net Settlement Fund will be distributed *pro rata* to Authorized Claimants, regardless of the date on which they submitted their Claim Forms.

ALLOCATION TABLES

GILT ALLOCATION TABLE Years to Maturity	Maturity	Risk Number	Multiplier
< 1 day	7 days	0	0
> 7 days	< 1 year	0.50	1
1 year	2 years	1.49	3
2 years	3 years	2.46	5
3 years	4 years	3.40	7
4 years	5 years	4.31	9
5 years	6 years	5.18	10
6 years	7 years	6.04	12
7 years	8 years	6.83	14
8 years	9 years	7.57	15
9 years	10 years	8.28	17
10 years	11 years	8.95	18
11 years	12 years	9.59	19
12 years	13 years	10.20	21
13 years	14 years	10.79	22
14 years	15 years	11.37	23
15 years	16 years	11.90	24
16 years	17 years	12.41	25
17 years	18 years	12.90	26
18 years	19 years	13.38	27
19 years	20 years	13.83	28
20 years	21 years	14.26	29
21 years	22 years	14.71	30
22 years	23 years	15.19	31
23 years	24 years	15.68	32
24 years	25 years	16.15	32
25 years	26 years	16.58	33
26 years	27 years	16.97	34
27 years	28 years	17.31	35
28 years	29 years	17.62	35
29 years	30 years	17.71	36
30 years	31 years	17.80	36
31 years	32 years	18.09	36
32 years	33 years	18.36	37
33 years	34 years	18.63	37
34 years	35 years	18.90	38
35 years	36 years	19.17	39

GILT ALLOCATION TABLE Years to Maturity	Maturity	Risk Number	Multiplier
36 years	37 years	19.43	39
37 years	38 years	19.67	40
38 years	39 years	19.91	40
39 years	40 years	20.15	40
> 40 years	45 years	20.7462	42
> 45 years	50 years	21.6249	43
> 50 years	55 years	22.3003	45
> 55 years	60 years	22.8942	46
> 60 years	90 years	24.5555	49
> 90 years		25.2200	51

GILT OPTIONS ALLOCATION TABLE Underlying Gilt Years to Maturity	Underlying Gilt Years to Maturity	Risk Number	Multiplier
< 1 day	7 days	0	0
> 7 days	< 1 year	0.15	.25
1 year	2 years	0.45	.50
2 years	3 years	0.74	1
3 years	4 years	1.02	2
4 years	5 years	1.29	3
5 years	6 years	1.55	3
6 years	7 years	1.81	4
7 years	8 years	2.05	4
8 years	9 years	2.27	5
9 years	10 years	2.49	5
10 years	11 years	2.68	5
11 years	12 years	2.88	6
12 years	13 years	3.06	6
13 years	14 years	3.24	7
14 years	15 years	3.41	7
15 years	16 years	3.57	7
16 years	17 years	3.72	7
17 years	18 years	3.87	8
18 years	19 years	4.01	8
19 years	20 years	4.15	8
20 years	21 years	4.28	9
21 years	22 years	4.41	9
22 years	23 years	4.56	9
23 years	24 years	4.70	9
24 years	25 years	4.84	10
25 years	26 years	4.97	10
26 years	27 years	5.09	10
27 years	28 years	5.19	10
28 years	29 years	5.29	11
29 years	30 years	5.31	11
30 years	31 years	5.34	11
31 years	32 years	5.43	11

GILT OPTIONS ALLOCATION TABLE			
Underlying Gilt Years to Maturity	Underlying Gilt Years to Maturity	Risk Number	Multiplier
32 years	33 years	5.51	11
33 years	34 years	5.59	11
34 years	35 years	5.67	11
35 years	36 years	5.75	12
36 years	37 years	5.83	12
37 years	38 years	5.90	12
38 years	39 years	5.97	12
39 years	40 years	6.04	12
> 40 years	45 years	6.22	13
> 45 years	50 years	6.49	13
> 50 years	55 years	6.69	13
> 55 years	60 years	6.87	14
> 60 years	90 years	7.37	15
> 90 years		7.57	15

GILT ASSET SWAP ALLOCATION TABLE			
Years to Maturity	Years to Maturity	Risk Number	Multiplier
< 1 day	7 days	0	0
> 7 days	< 1 year	0.50	1
1 year	2 years	1.49	3
2 years	3 years	2.46	5
3 years	4 years	3.40	7
4 years	5 years	4.31	9
5 years	6 years	5.18	10
6 years	7 years	6.04	12
7 years	8 years	6.83	14
8 years	9 years	7.57	15
9 years	10 years	8.28	17
10 years	11 years	8.95	18
11 years	12 years	9.59	19
12 years	13 years	10.20	21
13 years	14 years	10.79	22
14 years	15 years	11.37	23
15 years	16 years	11.90	24
16 years	17 years	12.41	25
17 years	18 years	12.90	26
18 years	19 years	13.38	27
19 years	20 years	13.83	28
20 years	21 years	14.26	29
21 years	22 years	14.71	30
22 years	23 years	15.19	31
23 years	24 years	15.68	32
24 years	25 years	16.15	32
25 years	26 years	16.58	33
26 years	27 years	16.97	34
27 years	28 years	17.31	35
28 years	29 years	17.62	35

GILT ASSET SWAP ALLOCATION TABLE			
Years to Maturity	Years to Maturity	Risk Number	Multiplier
29 years	30 years	17.71	36
30 years	31 years	17.80	36
31 years	32 years	18.09	36
32 years	33 years	18.36	37
33 years	34 years	18.63	37
34 years	35 years	18.90	38
35 years	36 years	19.17	39
36 years	37 years	19.43	39
37 years	38 years	19.67	40
38 years	39 years	19.91	40
39 years	40 years	20.15	40
> 40 years	45 years	20.7462	42
> 45 years	50 years	21.6249	43
> 50 years	55 years	22.3003	45
> 55 years	60 years	22.8942	46
>60 years	90 years	24.5555	49
>90 years		25.2200	51

GILT FUTURES ALLOCATION TABLE		
Duration	Ticker Symbol	Risk Number
Short Dated Gilts Futures (2 year)	WB H,M,U,Z	4
Medium Term Gilts Futures (5 year)	WX H,M,U,Z	9
Long Dated Gilts Futures (10 year)	LG H,M,U,Z	17
Ultra Long Dated Gilts Futures (30 year)	ULG H,M,U,Z	35
Note each contract is 100,000 GPB. If claims are submitted by contract, a multiplier of 100,000 needs to be applied.		
Eligible Futures Contracts G H09, G M09, G U09, G Z09 G H10, G M10, G U10, G Z10 G H11, G M11, G U11, G Z11 G H12, G M12, G U12, G Z12 G H13, G M13, G U13, G Z13 G H14, G M14 WXH10, WXM10, WXU10, WXZ10 WXH11, WXM11, WXU11, WXZ11 WXH12, WXM12, WXU12, WXZ12 WXH13, WXM13, WXU13, WXZ13 WXH14, WXM14 WBH10, WBM10, WBU10, WBZ10 WBH11, WBM11, WBU11, WBZ11 WBH12, WBM12, WBU12, WBZ12 WBH13, WBM13, WBU13, WBZ13 WBH14, WBM14 UGLH14, UGLM14, UGLU14		

OPTIONS ON GILT FUTURES ALLOCATION TABLE		Risk Number
Duration	Ticker Symbol	
Short Dated Gilts Futures (2 year)	WB H,M,U,Z	1
Medium Term Gilts Futures (5 year)	WX H,M,U,Z	3
Long Dated Gilts Futures (10 year)	LG H,M,U,Z	5
Ultra Long Dated Gilts Futures (30 year)	ULG H,M,U,Z	10
Note each contract is 100,000 GPB. If claims are submitted by contract, a multiplier of 100,000 needs to be applied.		
Eligible Futures Contracts G H09, G M09, G U09, G Z09 G H10, G M10, G U10, G Z10 G H11, G M11, G U11, G Z11 G H12, G M12, G U12, G Z12 G H13, G M13, G U13, G Z13 G H14, G M14 WXH10, WXM10, WXU10, WXZ10 WXH11, WXM11, WXU11, WXZ11 WXH12, WXM12, WXU12, WXZ12 WXH13, WXM13, WXU13, WXZ13 WXH14, WXM14 WBH10, WBM10, WBU10, WBZ10 WBH11, WBM11, WBU11, WBZ11 WBH12, WBM12, WBU12, WBZ12 WBH13, WBM13, WBU13, WBZ13 WBH14, WBM14 UGLH14, UGLM14, UGLU14		

Dated: November 3, 2025