

## **CANADIAN SSA BONDS CLASS ACTION**

### **Did You, Directly or Through an Intermediary or Investment Fund, Purchase a Supranational, Sovereign, Sub-Sovereign, Government, Quasi-Governmental or Agency Bond Between January 2005 and December 31, 2015?**

Settlements have been reached with Deutsche Bank, TD, Nomura, Credit Suisse, RBC, Barclays, BNP, Citigroup, and Credit Agricole (the “**Settling Defendants**”) in a proposed class action relating to supranational, sovereign, sub-sovereign, governmental, quasi-governmental, and agency bonds or debt instruments regardless of the structure, currency, or credit quality (collectively referred to as “**SSA Bonds**”).

The action alleges that, beginning at least as early as 2005 and continuing through 2015, the Defendants conspired with each other to fix prices in the SSA Bond market. The Defendants do not admit any wrongdoing or liability and disagree with the allegations in the lawsuit.

#### **Who is affected by the settlements?**

The settlements apply to persons in Canada who directly or indirectly (including through an intermediary or through an investment or equity fund, mutual fund, hedge fund, pension fund or other investment vehicle) entered into an SSA Bond Transaction between January 1, 2005 and December 31, 2015. An “**SSA Bond Transaction**” is any purchase, sale, trade, assignment, novation, unwind, termination, or other exercise of rights or options with respect to any SSA Bond.

#### **What are the settlement benefits?**

Pursuant to the settlements, Deutsche Bank has agreed to pay US\$1,600,500; TD has agreed to pay CAD\$250,000; Nomura has agreed to pay CAD\$350,000; Credit Suisse has agreed to pay CAD\$500,000; RBC has agreed to pay CAD\$250,000; Barclays has agreed to pay CAD\$150,000; BNP has agreed to pay CAD\$150,000; Citigroup has agreed to pay CAD\$200,000; and Credit Agricole has agreed to pay CAD\$400,000. In exchange, the claims raised in the class action against the Settling Defendants and their related entities will be released. The settlements are compromises of disputed claims and are not an admission of liability, fault, or wrongdoing. If approved, the settlements will resolve the litigation in its entirety.

#### **What happens to the money paid under the settlements?**

The Federal Court will be asked to approve a process for distributing all settlement funds achieved in this litigation (plus interest and less approved fees and expenses).

Under the proposed administration protocol, Settlement Class Members with total SSA Bond Transactions of CAD \$10,000,000 or greater will be eligible for compensation.

For more information about the proposed distribution, visit [www.siskinds.com/ssa-bonds](http://www.siskinds.com/ssa-bonds).

#### **When will the settlements, proposed distribution, and Class Counsel fees be approved?**

The settlements and proposed distribution must be approved by the Federal Court. A motion to approve the settlements and proposed distribution has been set for August 15, 2024. At the hearing, the Federal Court will also address Class Counsel’s fee request of 25% of the settlement amounts, plus disbursements and taxes. Persons who wish to object to the proposed

settlements, distribution or Class Counsel's fee request may do so by setting out their objection in writing. Objections must be sent to Class Counsel by July 31, 2024.

For information about the lawsuit, your rights, and how to exercise your rights, see the long-form notice and related documents available online at [www.siskinds.com/ssa-bonds](http://www.siskinds.com/ssa-bonds).