UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Mexican Government Bonds Antitrust Litigation	No. 18-cv-02830 (JPO)

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT,
DECEMBER 3, 2026 FAIRNESS HEARING THEREON AND CLASS MEMBERS' RIGHTS

TO: ALL PERSONS THAT ENTERED INTO A MEXICAN GOVERNMENT BOND TRANSACTION[1] WITH A DEFENDANT OR AN AFFILIATE OF A DEFENDANT BETWEEN AT LEAST JANUARY 1, 2006, AND APRIL 19, 2017, WHERE SUCH PERSONS WERE EITHER DOMICILED IN THE UNITED STATES OR ITS TERRITORIES OR, IF DOMICILED OUTSIDE THE UNITED STATES OR ITS TERRITORIES, TRANSACTED IN THE UNITED STATES OR ITS TERRITORIES.

A federal court authorized this Notice. This is not a solicitation from a lawyer.
You are not being sued.

PLEASE READ THIS ENTIRE NOTICE CAREFULLY. A UNITED STATES FEDERAL COURT AUTHORIZED THIS NOTICE. YOUR RIGHTS MAY BE AFFECTED BY THE PROCEEDINGS IN THIS ACTION. THIS NOTICE ADVISES YOU OF YOUR RIGHTS AND OPTIONS WITH RESPECT TO THIS ACTION, INCLUDING WHAT YOU MUST DO IF YOU WISH TO SHARE IN THE PROCEEDS OF THE SETTLEMENT.

If you are a brokerage firm, swaps dealer, or trustee through whom Mexican Government Bonds* ("MGBs")[2] *were traded from January 1, 2006 through April 19, 2017, inclusive, on behalf of customers that are members of the Settlement Class as defined in Section I.C. below, you must provide the name and last known address of such customers to the Settlement Administrator at the address listed in Section VIII below within two weeks of receiving this Notice. The Settlement Administrator will cause copies of this Notice to be forwarded to each customer identified at the address so designated.

This Notice of Proposed Class Action Settlement, December 3, 2026 Fairness Hearing Thereon and Class Members' Rights ("Notice") is given pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Southern District of New York (the "Court"). It is not junk mail, an advertisement, or a solicitation from a lawyer. You have not been sued. The purpose of this Notice is to inform you of the pendency of the above-captioned class action and your rights in connection with the proposed Settlement and release of the claims asserted.

A class action is a lawsuit in which one or more representative plaintiffs (in this case, Plaintiffs) bring a lawsuit on behalf of themselves and other similarly situated persons (i.e., a class) who have similar claims against the defendants. The representative plaintiffs, the court, and counsel appointed to represent the class have a responsibility to make sure that the interests of class members are adequately represented.

You are receiving this Notice because records indicate that you may have transacted in one or more Mexican Government Bond Transactions during the Class Period and may be a Settlement Class Member in this class action.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE. Inquiries concerning this Notice, the Proof of Claim and Release (the "Claim Form"), or any other questions by Settlement Class Members should be directed to:

Mexican Government Bonds Antitrust Settlement
c/o A.B. Data, Ltd.
P.O. Box 173123
Milwaukee, WI 53217
Tel.: 877-829-2941
(if calling from outside the United States or Canada, call 1-414-961-6592)
Email: info@MGBAntitrustSettlement.com
Website: www.MGBAntitrustSettlement.com

The Settling Defendants are Banco Santander México, S.A., Institución de Banca Múltiple, Grupo Financiero Santander México (formerly known as Banco Santander (México), S.A., Institución de Banca Múltiple, Grupo Financiero Santander México) ("Santander Mexico"); BBVA México, S.A., Institución de Banca Múltiple, Grupo Financiero BBVA México (formerly known as

[1] "Mexican Government Bond Transaction" means any purchase, sale, or exchange of Mexican Government Bonds, whether in the primary, secondary, or any other market.

[2] "Mexican Government Bonds" means any debt securities issued by the United Mexican States ("Mexico") that are Mexican Peso-denominated, including, but not limited to, CETES, Bondes D, UDIBONOS, and BONOS.

BBVA Bancomer S.A., Institución de Banca Múltiple, Grupo Financiero BBVA Bancomer) ("BBVA México"); Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex ("Citibanamex");[3] Deutsche Bank México, S.A., Institution de Banca Múltiple ("Deutsche Bank Mexico");[4] HSBC México, S.A., Institución De Banca Múltiple, Grupo Financiero HSBC ("HSBC Mexico"); and Bank of America México, S.A., Institución de Banca Múltiple ("Bank of America Mexico"). Settling Defendants have denied and continue to deny Plaintiffs' claims.

To resolve all Released Claims against all Released Parties, Settling Defendants have agreed to pay a total of $86.4 million dollars.[5] Plaintiffs entered into a settlement agreement with Settling Defendants on August 12, 2026 (the "Settlement Agreement").

The Court has preliminarily approved the Settlement with Settling Defendants. The Court has appointed the lawyers listed below to represent you and the Settlement Class in this Action ("Plaintiffs' Lead Counsel"):

Vincent Briganti
LOWEY DANNENBERG, P.C.
44 S. Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 733-7221
MGBSettlement@lowey.com

Only Members of the Settlement Class Who Previously Submitted a Valid Claim Form or Who Do So in Response to this Notice Will Be Eligible to Participate in the Net Settlement Fund. Assuming final approval by the Court, the eighty-six million four hundred thousand U.S. dollars ($86,400,000), plus interest, in Settlement Fund obtained from the Settling Defendants, net of such attorneys' fees, costs, fees, taxes, and other deductions as are approved by the Court (the "Net Settlement Fund"), will be distributed to the members of the Settlement Class who properly completed and timely returned a valid Claim Form, and are entitled to distribution under the Distribution Plan. **IF YOU TIMELY SUBMITTED A VALID PROOF OF CLAIM AND RELEASE PURSUANT TO THE CLASS NOTICE DATED APRIL 21, 2021, THEN YOU DO NOT HAVE TO SUBMIT A NEW PROOF OF CLAIM AND RELEASE TO PARTICIPATE IN THIS SETTLEMENT.** If you did not submit a Proof of Claim and Release pursuant to the April 21, 2021 Notice related to the $20.7 million in settlements with Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Barclays Capital Securities Limited, Barclays Bank México, S.A., Institución de Banca Múltiple, Grupo Financiero Barclays México, and Grupo Financiero Barclays México, S.A. de C.V. (collectively "Barclays") and JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Múltiple, J.P. Morgan Grupo Financiero, and J.P. Morgan Securities plc (collectively "JPMorgan"), you must act to submit a timely Proof of Claim and Release to be eligible to receive any portion of the Net Settlement Fund. Any member of the Settlement Class who previously submitted a Proof of Claim and Release in connection with the prior Notice will be subject to and bound by the release reflected in the Proof of Claim and Release form, unless such Class Member submits a timely and valid request for exclusion as explained below.

Fairness Hearing and Right to Object. The Court has scheduled a public hearing on final approval of the Settlement for December 3, 2026 ("Fairness Hearing"). The purpose of the Fairness Hearing is to determine, among other things, whether the Settlement, the Distribution Plan, and the application by Plaintiffs' Lead Counsel for attorneys' fees and payment of expenses are fair, reasonable, and adequate. If you remain in the Settlement Class, then you may object to any aspect of the Settlement, the Distribution Plan, Plaintiffs' Lead Counsel's request for attorneys' fees and payment of expenses, or any other matters. *See* Section III.B below. **All objections must be made in accordance with the instructions set forth below and must be filed with the Court and served on Plaintiffs' Lead Counsel and Settling Defendants' Counsel on or before October 29, 2026 or they will not be considered. *See* Section III.B below.**

Right to Exclude Yourself from the Settlement Class in the Settlement. The Court will exclude you from the Settlement Class if you make a written request for exclusion from the Settlement that is postmarked to the Settlement Administrator (A.B. Data, Ltd.) at the address set forth in Section VIII no later than October 29, 2026. *See* Section III.C. **To be valid, the request for exclusion must comply with the requirements set forth in the Court's Order dated August 19, 2026 (the "Preliminary Approval Order") and summarized in Section III.C below.** If you exclude yourself from the Settlement Class, you will not be entitled to share in the Net Settlement Fund.

I. BACKGROUND OF THE LITIGATION

[3] The parties understand and agree that the entity described in this litigation as "Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex" refers to Banco Nacional de Mexico, S.A., integrante del Grupo Financiero Banamex.

[4] Deutsche Bank Mexico came under the ownership of Grupo Financiero Citi México, S.A. de C.V. and Citi GSCP Inc., both of which are indirect, wholly owned subsidiaries of Citigroup Inc. Deutsche Bank Mexico was renamed Banco Citi México, S.A. Institución de Banca Múltiple, Grupo Financiero Citi México, which is now an indirect, wholly owned subsidiary of Citigroup Inc.

[5] Capitalized terms, not otherwise defined herein, shall have the same meanings assigned to them in the Settlement Agreement, as applicable.

A. The Nature of the Litigation

Plaintiffs allege that each Defendant,[6] from January 1, 2006 through April 19, 2017, inclusive, conspired to fix the prices for Mexican Government Bonds issued by the Mexican government through the Bank of Mexico ("Banxico"). Plaintiffs allege that each Defendant transacted in price-fixed MGBs at artificial prices with market participants like Plaintiffs and the Class. Plaintiffs' lawsuit contends that Defendants fixed MGB prices through several interrelated means.

First, Defendants allegedly sold newly issued MGBs purchased at auction into the secondary market at artificially high, price-fixed terms. Plaintiffs allege that Defendants controlled a significant market share of MGBs through privileges associated with their market maker status. Defendants allegedly manipulated the MGB market by communicating prices, pooling information about expected customer flows, and exchanging other confidential bank information through interbank chatrooms, telephone calls, and in-person meetings. Plaintiffs claim that Defendants' conspiracy caused Plaintiffs and the Class to pay higher prices for newly issued MGBs sold into the secondary market than they otherwise would have.

Second, Defendants allegedly agreed to fix the "bid-ask spread" artificially wider when offering to buy or sell MGBs in secondary market trading with Plaintiffs and the Class. Plaintiffs allege that Defendants fixed bid-ask spreads by communicating prices, expected customer flows, and sensitive bank information through interbank chatrooms, telephone calls, and in-person meetings. Plaintiffs claim that the result of Defendants' alleged conspiracy was that investors were underpaid by Defendants' suppression of the "bid price," the price at which Defendants offered to buy MGBs from investors, and overcharged by Defendants' inflation of the "ask price," the price at which Defendants offered to sell MGBs to investors.

Plaintiffs have asserted legal claims under federal antitrust law and common law.

Plaintiffs and Plaintiffs' Lead Counsel believe that Settlement Class Members have been damaged by Defendants' alleged conduct. Settling Defendants do not agree with the allegations made by Plaintiffs, believe that they have meritorious defenses to Plaintiffs' allegations, and believe that Plaintiffs' claims would have been rejected prior to trial, at trial (had Plaintiffs successfully certified a class and survived summary judgment motions), or on appeal. As a result, Settling Defendants believe Settlement Class Members would have received nothing if the litigation had continued to trial.

The Court has not decided in favor of Plaintiffs or the Settling Defendants. Instead, Plaintiffs' Lead Counsel engaged in negotiations with Settling Defendants to reach a negotiated resolution of the claims against Settling Defendants in this Action. The Settlement allows Plaintiffs and Settling Defendants to avoid the risks and costs of lengthy litigation and the uncertainty of pre-trial proceedings, a trial, and appeals. If approved, the Settlement would permit eligible Settling Class Members, who file timely and valid Claim Forms, to receive some compensation, rather than risk ultimately receiving nothing. Plaintiffs and Plaintiffs' Lead Counsel believe the Settlement is in the best interest of all Settlement Class Members.

The Settling Defendants have collectively agreed to pay $86.4 million (the "Settlement Amount") in cash for the benefit of the proposed Settlement Class. If the Settlement is approved, the Settlement Amount, plus interest earned from the date it was established, less any Taxes, any Notice and Administration Costs, any Court-awarded attorneys' fees, litigation costs and expenses, and service awards for Plaintiffs, and any other costs or fees approved by the Court (the "Net Settlement Fund"), will be divided among all Settling Class Members who file valid Claim Forms.

If the Settlement is approved, the Action will conclude. If the Settlement is not approved, Settling Defendants will remain as defendants in the Action, and Plaintiffs will continue to pursue their claims against Settling Defendants.

B. Procedural History

[6] "Defendants" are Banco Bilbao Vizcaya Argentaria, S.A., BBVA Securities, Inc., BBVA Compass Bancshares, Inc., BBVA Bancomer S.A., Institución de Banca Múltiple, Grupo Financiero BBVA Bancomer, Grupo Financiero BBVA Bancomer, S.A. de C.V., Banco Santander S.A., Santander Investment Securities, Inc., Santander Holdings USA, Inc., Banco Santander (Mexico) S.A. Institución de Banca Múltiple, Grupo Financiero Santander Mexico, Santander Investment Bolsa, Sociedad de Valores, S.A.U., Bank of America N.A., Bank of America Corporation, BankAmerica International Financial Corporation, Bank of America Mexico, S.A., Institución de Banca Múltiple, Grupo Financiero Bank of America, Merrill Lynch, Pierce, Fenner & Smith Incorporated, Citigroup Inc., Barclays Bank Mexico, S.A., Barclays Bank PLC, Barclays Capital Securities Limited, Grupo Financiero Barclays Mexico, S.A. de C.V., Barclays plc, Barclays Capital Inc., Institución de Banca Múltiple, Grupo Financiero Barclays México, Citigroup Global Markets Inc., Citigroup Financial Products Inc., Citigroup Global Markets Holdings Inc., Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex, S.A. de C.V., Credit Suisse Group AG, Credit Suisse AG, Grupo Financiero Credit Suisse (Mexico), S.A. de C.V., Banco Credit Suisse (Mexico), S.A., Deutsche Bank AG, Deutsche Bank Securities Inc., Deutsche Bank Americas Holding Corp., Deutsche Bank México, S.A. Institución de Banca Múltiple, HSBC Holdings plc, HSBC Bank plc, HSBC Securities (USA) Inc., HSBC Markets (USA) Inc., HSBC México, S.A., Institución de Banca Múltiple, Grupo Financiero HSBC, HSBC North America Holdings Inc., HSBC Latin America Holdings (UK) Limited, ING Groep N.V., ING Bank, N.V., and ING Financial Markets LLC, JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Múltiple, J.P. Morgan Grupo Financiero, J.P. Morgan Securities plc, UBS Bank Mexico, S.A., Institución de Banca Múltiple, UBS Grupo Financiero, and Banco de Inversión Afirme, S.A., Institución de Banca Múltiple, Afirme Grupo Financiero.

On March 30, 2018, Plaintiffs Oklahoma Firefighters Pension & Retirement System and Electrical Workers Pension Fund Local 103, I.B.E.W. filed the first class action complaint in this Action against the Settling Defendants and other defendants. Five additional class action complaints relating to the same facts and circumstances of this Action were filed in May 2018 against Settling Defendants and other defendants. On June 18, 2018, the Court granted an order consolidating the six related class action complaints and appointing Lowey Dannenberg, P.C. as interim class counsel. Thereafter, on July 18, 2018, Plaintiffs filed a first amended consolidated class action complaint ("FAC"), adding Plaintiffs Manhattan and Bronx Surface Transit Operating Authority Pension Plan, Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, Boston Retirement System, Southeastern Pennsylvania Transportation Authority Pension Plan, United Food and Commercial Workers Union and Participating Food Industry Employers Tri-State Pension Fund, and Government Employees' Retirement System of the Virgin Islands.

Defendants filed their motions to dismiss the FAC on September 17, 2018, which Plaintiffs opposed. On September 30, 2019, the Court granted Defendants' motion to dismiss the FAC for failure to state a claim and directed Plaintiffs to file a letter seeking leave to file a further amended complaint within twenty-one days. Plaintiffs submitted a letter motion seeking leave to file a proposed Second Amended Class Action Complaint on October 21, 2019, to which Defendants responded. On October 25, 2019, the Court granted Plaintiffs' letter motion, and on December 9, 2019, Plaintiffs filed a Second Amended Consolidated Class Action Complaint ("SAC"). Defendants filed their motion to dismiss the SAC on February 21, 2020, which Plaintiffs again opposed. On November 30, 2020, the Court granted Defendants' motion to dismiss the SAC for lack of personal jurisdiction.

On June 1, 2020, Plaintiffs filed their motion for preliminary approval of settlements with Barclays and JPMorgan, which the Court granted on December 16, 2020. On September 9, 2021, Plaintiffs filed their motion for final approval of the Barclays and JPMorgan settlements and Lead Counsel's motion for attorneys' fee and payment of expenses. The Court granted both motions and entered judgment in October 2021.

On May 20, 2021, Plaintiffs filed their motion for reconsideration of the Court's November 30, 2020 order dismissing the SAC, which the Court denied on March 30, 2022. On August 17, 2022, the Court entered judgment in favor of Bank of America Mexico, BBVA Bancomer, Citibanamex, Deutsche Bank Mexico, HSBC Mexico and Santander Meixco.

Plaintiffs appealed the Court's judgment and orders to the United States Court of Appeals for the Second Circuit on September 15, 2022. After the appeal was fully briefed and following oral argument, the Second Circuit vacated the Court's judgment and remanded the case on February 9, 2024.

The Court reopened the case on April 3, 2024, and Plaintiffs filed their Third Amended Complaint ("TAC") on June 12, 2024. Settling Defendants filed a motion to dismiss the TAC on July 29, 2024, which Plaintiffs again opposed. After the motion was fully briefed, the Court denied Settling Defendants' motion to dismiss the TAC on January 15, 2025. Settling Defendants thereafter filed their answers to the TAC.

On May 11, 2026, Plaintiffs and Settling Defendants reached an agreement in principle to settle Plaintiffs' claims against Settling Defendants for $86,400,000. Plaintiffs and Settling Defendants negotiated the material terms and executed the Settlement Agreement on August 12, 2026. The Court granted preliminary approval of the Settlement on August 19, 2026. Settling Defendants deny the allegations in the pleadings in the case, deny that they have engaged in any wrongdoing and vigorously dispute that Plaintiffs and the Class are entitled to any relief, but nevertheless agree to resolve the case to eliminate the uncertainties, burden, expense and delay of further litigation.

C. <u>The Definition of the Settlement Class</u>

In the Preliminary Approval Order, the Court preliminarily approved the following Settlement Class, defined as:

> All Persons that entered into a Mexican Government Bond Transaction with a Defendant or an affiliate of a Defendant between at least January 1, 2006, and April 19, 2017, where such persons were either domiciled in the United States or its territories or, if domiciled outside the United States or its territories, transacted in the United States or its territories. Excluded from the Class are Defendants and their employees, agents, affiliates, parents, subsidiaries and co-conspirators, whether or not named in the Complaint in this Action, and the United States and Mexican governments; provided, however, that Investment Vehicles shall not be excluded from the definition of "Class" or "Settlement Class" solely on the basis of being deemed to be Defendants or affiliates or subsidiaries of Defendants.

Notwithstanding the sentence above that "[e]xcluded from the Class are the Defendants and their employees, agents, affiliates, parents, subsidiaries, and co-conspirators, whether or not named in the Complaint in this Action, and the United States and Mexican governments," and solely for purposes of this Settlement and this Settlement Class, Investment Vehicles shall not be excluded from the Settlement Class solely on the basis of being deemed to be Defendants or affiliates or subsidiaries of Defendants; provided, however, that under no circumstances may a Defendant (or any of its direct or indirect parents, subsidiaries, affiliates, or divisions) receive a distribution from the Settlement Fund through an Investment Vehicle.

If you are not sure whether you are included in the Settlement Class, you can ask for free help. You can call toll-free 1-877-829-2941 (if calling from outside the United States or Canada, call 1-414-961-6592) or visit www.MGBAntitrustSettlement.com for more information.

II. SUMMARY OF THE PROPOSED SETTLEMENT

A. Settlement with Settling Defendants

On behalf of the Settlement Class, Plaintiffs entered into the Settlement Agreement with Settling Defendants on August 12, 2026 The following description of the proposed Settlement is only a summary. This description and this Notice are qualified in their entirety by the Settlement Agreement which is on file with the Court at the address indicated in this Notice and is available at the official website for the Settlement, at www.MGBAntitrustSettlement.com (the "Settlement Website"). In the event of any conflict between the Settlement Agreement and this Notice, the terms of the Settlement Agreement shall control.

1. Settling Defendants' Payments for the Benefit of the Settlement Class

a. No Right to Reversion

The Settlement Agreement does not provide Settling Defendants with a right of reversion. That is, no matter how many Class Members fail to file a Claim Form or choose to opt-out, if the Settlement is not terminated and is finally approved by the Court, none of the Settlement monies will revert to the Settling Defendants. This is not a claims-made settlement; there will be no reversion.

b. Settling Defendants' Potential Right To Termination

Section 20 of the Settlement Agreement describes Settling Defendants' right to terminate the Settlement if certain events occur. With respect to each such event, Settling Defendants have the right (as qualified in the Settlement Agreement), but not the obligation, to determine to exercise, in its sole discretion, its right to terminate if the event occurs.

c. Distribution Plan

The Distribution Plan is available for review on the Settlement Website at www.MGBAntitrustSettlement.com. Changes, if any, to the Distribution Plan based on newly available data or information will be promptly posted on the Settlement Website. Please see the Settlement Website for the most up-to-date information about the Distribution Plan. Members of the Settlement Class are strongly encouraged to review the Settlement Website for any changes to the Distribution Plan.

d. Changes or Further Orders by the Court

Any change by the Court of the Distribution Plan, the time and place of the Fairness Hearing, or any other matter and all further orders or requirements by the Court will be posted on the Settlement Website at www.MGBAntitrustSettlement.com as soon as practicable.

It is important that you refer to the Settlement Website as no other notice may be published of such changes.

2. The Release and Covenant Not to Sue under the Settlement Agreement

IF YOU HAVE NOT VALIDLY REQUESTED TO BE EXCLUDED FROM THE SETTLEMENT CLASS, WHEN THE SETTLEMENT BECOMES FINAL YOU WILL BE RELEASING THE CLAIMS DESCRIBED BELOW, AND YOU WILL BE BOUND BY THE RELEASES IN THE SETTLEMENT AGREEMENT INCLUDING THE COVENANT NOT TO SUE—EVEN IF YOU DO NOT FILE A PROOF OF CLAIM AND RELEASE.

Unless you exclude yourself, you remain a Settling Class Member. That means you can't sue, continue to sue, or be part of any other lawsuit about the Released Claims in this Action against Settling Defendants or any of the Released Parties. Upon the Effective Date, the Releasing Parties shall release and be deemed to release and forever discharge and shall be forever enjoined from prosecuting the Released Claims against the Released Parties, regardless of whether such Releasing Party executes and delivers a Claim Form.

The capitalized terms used in this paragraph are defined in the Settlement Agreement, Preliminary Approval Order, or this Notice. For easy reference, certain of these terms are copied below:

> • "**Released Parties**" or "**Released Party**" means Settling Defendants and each of their respective past and present direct and indirect corporate parents (including holding companies), subsidiaries, related entities, affiliates, associates (all as defined in SEC Rule 12b-2 promulgated pursuant to the Securities Exchange Act of 1934), divisions, joint ventures, predecessors, and successors, and each of their respective past or present officers, directors, partners, members, managers, managing directors, employees, agents, contractors, attorneys, legal or other representatives, trustees, trusts, heirs, beneficiaries, estates, executors, administrators, insurers, shareholders, advisors, and assigns of each of the foregoing.

> • "**Releasing Parties**" means, individually and collectively, Plaintiffs and each Settling Class Member, on behalf of themselves and any of their respective predecessors, successors and assigns, direct and indirect parents, subsidiaries and affiliates, and on behalf of their respective past or present officers, directors, stockholders, agents, employees, legal representatives, partners, principals, members, participants, associates, trustees, beneficiaries, parents, subsidiaries, divisions,

affiliates, and the heirs, executors, administrators, purchasers, predecessors, successors, and assigns of each of the foregoing, whether or not they object to the Settlement and whether or not they make a claim for payment from the Net Settlement Fund.

• "**Released Claims**" means any and all manner of claims, rights, demands, obligations, damages, actions or causes of action, cross-claims, counterclaims, judgments, suits, obligations, debts, setoffs, rights of recovery, charges or liabilities of any kind whatsoever (however denominated), of every nature and description, whether known or unknown, suspected or unsuspected, asserted or unasserted, whether class, derivative or individual, whether fixed or contingent, in law or in equity, whether arising under federal, state, common, statutory or foreign law or regulation (including Fed. R. Civ. P. 11), whether directly, representatively, derivatively, or in any other capacity, which any member of the Settlement Class ever had, now have, or hereafter can, shall, or may have that arise out of or relate in any way to the acts, facts, statements, or omissions that were or could have been alleged or asserted by Plaintiffs or any member of the Settlement Class in the Action, including, but not limited to, any claims arising from or related to (a) any purported conspiracy, collusion, racketeering activity, or other improper conduct related to Mexican Government Bonds or Mexican Government Bond Transactions, (b) any alleged manipulation of the prices of Mexican Government Bonds or Mexican Government Bond Transactions, or (c) the sharing or exchange of customer information or confidential information, including, but not limited to, customer identity, trading patterns, net positions, or orders with respect to Mexican Government Bonds or Mexican Government Bond Transactions. For the avoidance of doubt, Released Claims do not include claims relating to enforcement of the Settlement and do not include claims arising under foreign law based solely on transactions executed entirely outside of the United States by members of the Settlement Class domiciled outside the United States.

You are automatically a member of a Settling Class if you fit the Settlement Class description. However, if you do not submit a timely and valid Claim Form, you will not receive any payment from the Settlement. You will be bound by past and any future Court rulings, including rulings on the Settlement and Released Claims. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be a part of any other lawsuit against Settling Defendants or any of the other Released Parties on the basis of the Released Claims.

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The Settlement Agreement does not settle or compromise any claims other than those set out therein. All rights of the Plaintiffs or any Settling Class Member against any person or entity other than the parties released in the Settlement Agreement are specifically reserved by the Plaintiffs and the Class Members.

III. YOUR OPTIONS

A. Claim Form for the Settlement Agreement

IF YOU TIMELY SUBMITTED A VALID CLAIM FORM PURSUANT TO THE APRIL 21, 2021 NOTICE RELATED TO THE $20.7 MILLION IN SETTLEMENTS WITH BARCLAYS AND JPMORGAN, YOU DO NOT HAVE TO SUBMIT A NEW CLAIM FORM TO PARTICIPATE IN THIS SETTLEMENT. If you did not submit a timely Claim Form, to participate in and receive your share of the Net Settlement Fund, you must submit a valid and timely Claim Form demonstrating that you are an Authorized Claimant as set forth in the Settlement Agreement. You may obtain and submit a Claim Form no later than January 4, 2027 on the Settlement Website (www.MGBAntitrustSettlement.com). Claim Forms, if sent by mail, must be addressed to the Settlement Administrator (*see* address in Section VIII below) and postmarked no later than January 4, 2027. A copy of the Claim Form is available on the Settlement Website at www.MGBAntitrustSettlement.com.

Any Settling Class Member who previously submitted a Claim Form in connection with the April 21, 2021 Notice will be subject to and bound by the release in this Settlement. Any Settling Class Member did not submit a Claim Form pursuant to the April 21, 2021 Notice and who fails to submit a Claim Form by January 4, 2027 in the manner specified will be barred from receiving any payment from the Net Settlement Fund (unless, by Order of the Court, an untimely Claim Form submitted by such member of the Settlement Class is approved), but will in all other respects be bound by the terms of the Settlement Agreement and by the Final Judgment entered on the Class's claims.

B. Object to the Settlement

If you are a Class Member and you do not exclude yourself, you can tell the Court what you think about the Settlement. You can object to all or any part of the Settlement, Distribution Plan, and/or application for attorneys' fees, reimbursement of litigation costs and expenses, and any service awards for Plaintiffs. You can give reasons why you think the Court should approve them or not. The Court will consider your views.

If you want to make an objection in the Action, you may enter an appearance in the Action, at your own expense, individually or through counsel of your own choice, by filing with the Clerk of Court a notice of appearance and your objection, and serving copies of your objection on Plaintiffs' Lead Counsel and Settling Defendants' Counsel by **October 29, 2026** to the following mailing addresses:

Counsel for Plaintiffs (Lead Counsel)
Vincent Briganti LOWEY DANNENBERG, P.C. 44 S. Broadway, Suite 1100 White Plains, NY 10601-2310 MGBSettlement@lowey.com

Counsel for Settling Defendants			
Counsel for Banco Santander México, S.A., Institución de Banca Múltiple, Grupo Financiero Santander México	Alan E. Schoenfeld WILMER CUTLER PICKERING HALE AND DORR LLP 7 World Trade Center 250 Greenwich Street New York, NY 10007 USA alan.schoenfeld@wilmerhale.com	***Counsel for Defendant BBVA México, S.A., Institución de Banca Múltiple, Grupo Financiero BBVA México***	Arthur J. Burke Caroline Stern DAVIS POLK & WARDWELL LLP 450 Lexington Avenue New York, New York 10017 arthur.burke@davispolk.com caroline.stern@davispolk.com
Counsel for Banco Nacional de México, S.A., Institución de Banca Múltiple, Grupo Financiero Banamex	Roger A. Cooper Samuel Levander Charity E. Lee CLEARY GOTTLIEB STEEN & HAMILTON LLP One Liberty Plaza New York, NY 10006 racooper@cgsh.com slevander@cgsh.com chalee@cgsh.com	***Counsel for Deutsche Bank México, S.A., Institution de Banca Múltiple***	Abram J. Ellis Karen M. Porter SIMPSON THACHER & BARTLETT LLP 900 G Street, NW Washington, D.C. 20001 aellis@stblaw.com karen.porter@stblaw.com Jonathan K. Youngwood SIMPSON THACHER & BARTLETT LLP 425 Lexington Avenue New York, New York 10017 jyoungwood@stblaw.com
Counsel for HSBC México, S.A., Institución De Banca Múltiple, Grupo Financiero HSBC	Boris Bershteyn Susan Saltzstein Kamali P. Willett SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP One Manhattan West New York, New York 10001 boris.bershteyn@skadden.com susan.saltzstein@skadden.com kamali.willett@skadden.com	***Counsel for Bank of America México, S.A., Institución de Banca Múltiple***	Adam S. Hakki Jeffrey Resetarits ALLEN OVERY SHEARMAN STERLING US LLP 599 Lexington Avenue New York, New York 10022 ahakki@aoshearman.com jeffrey.resetarits@aoshearman.com

Any Settlement Class Member who does not enter an appearance and does not object will be represented by Plaintiffs' Lead Counsel.

If you choose to object, you must file a written objection with the Clerk of the Court. You cannot file an objection by telephone or email. Your written objection must include a statement of the objection as well as the specific legal and factual reasons for each objection, including all support that you wish to bring to the Court's attention and all evidence you wish to introduce in support of your objection. The submission must contain: (i) a heading that refers to this Action by case name and case number (*In re Mexican Government Bonds Antitrust Litigation*, No. 18-cv-02830 (JPO) (S.D.N.Y.)); (ii) a statement of the specific legal and factual basis for each objection , including whether the objection applies only to you, a specific subset of the Class or the entire Class; (iii) a statement of whether you intend to appear at the Fairness Hearing, either in person or through counsel and, if through counsel, a statement identifying that counsel by name, address, telephone number, and email address; (iv) a description of any and all evidence you may offer at the Fairness Hearing, including but not limited to the names, addresses, email addresses and expected testimony of any witnesses; all exhibits intended to be introduced at the Fairness Hearing; and documentary proof of your membership in the Class; (v) a description of your Mexican Government Bond Transactions that fall within the Class definition (including, for each transaction, the identity of the broker, the date of the transaction, the type of the transaction, the counterparty (if any), any transaction identification numbers, the rate, and the notional amount of the transaction); and (vi) a list of other cases in which you or your counsel has appeared either as an objector or counsel for an objector in the last five years. Persons who have timely submitted a valid Request for Exclusion are not members of the Class and are not entitled to object. All written objections must be signed by you (or your legally authorized representative), even if you are represented by counsel

If you do not timely and validly submit your objection, your views will not be considered by the Court or any court on appeal. Check the Settlement Website at www.MGBAntitrustSettlement.com for updates on important dates and deadlines relating to the settlement.

C. <u>Request to be Excluded from the Settlement Class for the Settlement Agreement</u>

You can exclude yourself by sending a written "Request for Exclusion." You cannot exclude yourself by telephone or email. Your written Request for Exclusion must contain: (a) your name, address, telephone number, and email address; (b) a list of all trade names or business names (if applicable) that you request to be excluded; (c) the name of this Action (*In re Mexican Government Bonds Antitrust Litigation*, No. 18-cv-02830 (JPO) (S.D.N.Y.)); (d) a statement certifying such person is a member of the Settlement Class; (e) a description of the Mexican Government Bonds Transactions entered into by the member of the Settlement Class that fall within the Settlement Class definition (including, for each transaction, the identity of the broker, the date of the transaction, the type of the transaction, the counterparty (if any), any transaction identification numbers, the rate, and the notional amount of the transaction); (f) a statement that "I/we hereby request that I/we be excluded from the Settlement Class."

A Request for Exclusion that does not include all of the foregoing information, that does not contain the proper signature, that is sent to an address other than the one designated, or that is not sent within the time specified shall be invalid and the person(s) filing such an invalid request shall be a Settling Class Member and shall be bound by the Settlement, if approved.

Requests for exclusion from the Settlement Class for the Settlement Agreement must be sent by U.S. first class mail (preferably certified mail) (or, if sent from outside the U.S., by a service that provides for guaranteed delivery within five (5) or fewer calendar days of mailing) to the Settlement Administrator at:

Mexican Government Bonds Antitrust Settlement
c/o A.B. Data, Ltd.
P.O. Box 173123
Milwaukee, WI 53217
Tel.: 877-829-2941
(if calling from outside the United States or Canada, call 1-414-961-6592)
Email: info@MGBAntitrustSettlement.com
Website: www.MGBAntitrustSettlement.com

Requests for exclusion must be postmarked no later than October 29, 2026.

If you submit a valid and timely Request for Exclusion in the manner set forth above, you will not be bound by the Settlement Agreement and can independently pursue claims you may have against the Settling Defendants at your own expense. You may also enter an appearance through an attorney if you so desire. However, if you exclude yourself from the Settlement Agreement, you will not be eligible to share in the Net Settlement Fund and shall have no rights under the Settlement. In addition, if you exclude yourself from the Settlement Class, you will not be entitled to object to the Settlement or to appear at the Fairness Hearing.

IV. PROOF OF CLAIM AND RELEASE

The Claim Form includes instructions on how and when to make a claim. You may obtain a Claim Form or complete the online Claim Form on the Settlement Website at www.MGBAntitrustSettlement.com; you may also request that a Claim Form be mailed to you by calling the Settlement Administrator toll free at 1-877-829-2941. You should consider reading the Settlement Agreement and you should read the Claim Form carefully before submitting your Claim Form or determining another course of action.

V. ATTORNEYS' FEES AND COSTS

Settling Class Members are not personally responsible for payment of attorneys' fees or expenses. As compensation for their time and their risk in prosecuting the litigation on a wholly contingent fee basis for approximately eight years, Plaintiffs' Lead Counsel will ask the Court for an award of attorneys' fees in the amount of no more than one-third of the Settlement Fund or twenty-eight million eight hundred thousand dollars ($28,800,000) of the Settlement Fund, as a common fund; and an award for unreimbursed litigation costs and expenses in the amount of no more than $500,000, and Service Awards to Plaintiffs in the amount of no more than $10,000 each, all to be deducted from the Settlement Fund. Additionally, Plaintiffs' Lead Counsel may apply at the time of any application for distribution to qualifying members of the Settlement Class, for an award from the Settlement Fund of attorneys' fees for services performed and reimbursement of expenses incurred in connection with the administration of the Settlement Agreement after the date of the Fairness Hearing.

VI. FAIRNESS HEARING AND RIGHT TO OBJECT

The Court has scheduled a Fairness Hearing for December 3, 2026 at 3:00 P.M. to be held telephonically from the Thurgood Marshall United States Courthouse (855-244-8681 access code 2312 828 7066##). During the Fairness Hearing, the Court will determine, among other things, if the proposed Settlement is fair, reasonable, and adequate. The Court will also consider Plaintiffs' Lead Counsel's request for attorneys' fees and reimbursement of litigation expenses.

The time, date, and venue of the Fairness Hearing may be continued from time to time without further notice and could be conducted remotely or in-person. You are advised to confirm the time and location if you wish to attend; as soon as practicable after any change in the scheduled date, time, and/or location, such change will be posted on the Settlement Website.

If you are a Settling Class Member, you are entitled to appear, in person or through duly authorized attorneys, and to show cause why the Settlement or other applications should or should not be approved. However, if you wish to appear, you must submit a written statement, along with any materials you wish the Court to consider—see Section III.B above. This written statement must be received by the Court (at the address provided above) no later than October 29, 2026 or it will not be considered. Such materials must also be served on Plaintiffs' Lead Counsel and counsel of record for the Settling Defendants at the addresses set forth in Section III.B. by overnight mail or by hand or they will not be considered.

VII. CHANGE OF ADDRESS

If this Notice reached you at an address other than the one on the mailing label, or if your address changes, please send your updated information to the Settlement Administrator at the address set forth in Section VIII below.

VIII. THE SETTLEMENT ADMINISTRATOR

The Court has appointed A.B. Data, Ltd. as the Settlement Administrator. Among other things, the Settlement Administrator is responsible for providing notice of the Settlement to the Settlement Class and processing Claim Forms. You may contact the Settlement Administrator through the Settlement Website, by telephone toll free at 1-877-829-2941, or by writing to the Settlement Administrator at the below address:

Mexican Government Bonds Antitrust Settlement
c/o A.B. Data, Ltd.
P.O. Box 173123
Milwaukee, WI 53217

IX. ADDITIONAL INFORMATION

The Settlement Agreement and other important documents related to these Actions are available online at www.MGBAntitrustSettlement.com and also available for review during normal business hours at the office of the Clerk of Court, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-1312. If you have questions about this Notice, the procedure for registering, or the Settlement Agreement, you may contact Plaintiffs' Lead Counsel at the address listed in Section III.B.

DO NOT CONTACT THE DISTRICT COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE.

Dated: September 18, 2026

BY ORDER OF THE COURT.
Clerk of the United States District Court
Southern District of New York