

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

United States District Court for the Western District of Pennsylvania
In re: Diisocyanates Antitrust Litigation, Master Docket Misc. No. 18-1001, MDL No. 2862

If you purchased certain chemical Products at any time from January 1, 2016 through July 29, 2026, you could be eligible for benefits from a class action settlement.

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

- A proposed Settlement has been reached with The Dow Chemical Company (“Dow”), Huntsman International LLC, and Huntsman Corporation (“Huntsman”) (collectively, “Defendants Dow and Huntsman” or the “Settling Defendants”) in a consolidated class action lawsuit that alleges that, from January 1, 2016 through December 31, 2019, Dow and Huntsman conspired with other chemical manufacturer Defendants to fix prices and restrict the supply of methylene diphenyl diisocyanate (MDI) and toluene diisocyanate (TDI) (the “Products”). The Products are industrial chemicals widely used in the production of polyurethanes for construction, automotive, furniture, and consumer goods. Dow and Huntsman have denied these allegations and any wrongdoing. To avoid the risks and costs of continuing the Litigation, both sides have agreed to a Settlement.
- Previous settlements were reached with BASF Corporation, BASF SE, Covestro LLC, and Wanhua Chemical (America) Co., Ltd.
- The Dow and Huntsman Settlement Class includes all persons and entities in the United States, its territories, and/or the District of Columbia who purchased or received directly (including through controlled subsidiaries, agents, affiliates and/or joint ventures) the Products¹ from any of (1) Defendants,² Covestro AG, Wanhua Chemical Group Co., Ltd., Mitsui Chemicals, Inc., Mitsui Chemicals America, Inc., MCNS (a.k.a. Mitsui Chemicals & SKC Polyurethanes, Inc.), or MCNS Polyurethanes USA Inc., or (2) the subsidiaries, affiliates, or successors of any of the foregoing, at any time during the Class Period.³ The Dow and Huntsman Settlement Class excludes the defendants named in the Complaint and/or any complaint filed in the Class Actions, alleged co-conspirators, and any of their parents, subsidiaries or affiliates. The Dow and Huntsman Settlement Class further excludes state and federal government entities. The Dow and Huntsman Settlement Class also excludes all judicial officers presiding over this action and their immediate family members and staff, and any juror assigned to this action.
- Under this Settlement, Dow and Huntsman have agreed to pay a combined \$20,000,000⁴ into a Fund for payments to Dow and Huntsman Settlement Class Members, court-approved attorneys’ fees, costs, and expenses, service awards, and notice and administration costs. Dow and Huntsman have also agreed to use reasonable best efforts to authenticate a number of documents previously provided in the Litigation.
- Your legal rights are affected whether you act or do not act, so please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS	
ASK TO BE EXCLUDED BY OCTOBER 19, 2026	If you decide to exclude yourself, you will keep the right to sue Dow and Huntsman in a separate lawsuit about the claims this Settlement resolves. This is the only option that allows you to sue, continue to sue, or be part of another lawsuit against Dow and Huntsman related to the legal claims released by this Settlement.
OBJECT TO THE SETTLEMENT BY OCTOBER 19, 2026	If you do not exclude yourself from the Dow and Huntsman Settlement Class, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your objection at the Fairness Hearing.

¹ Products mean any and all kinds of methylene diphenyl diisocyanate (“MDI”) and toluene diisocyanate (“TDI”), no matter the trade name under which such product is sold.

² “Defendants” means all those entities set forth in Paragraph 13 of the Dow and Huntsman Settlement Agreement.

³ The Class Period runs from January 1, 2016 up to and including the Execution Date of the Settlement, which is July 29, 2026.

⁴ The Dow Chemical Company will contribute \$14,000,000 to the Fund and Huntsman International LLC will contribute \$6,000,000.

Questions? Call (833) 930-0157 or visit www.DiisocyanatesAntitrustLitigation.com.

YOUR LEGAL RIGHTS AND OPTIONS	
SUBMIT A CLAIM BY OCTOBER 19, 2026	Submit a claim to receive a distribution from the Fund as outlined in the Settlement Agreement and Court-approved Plan of Allocation.
GO TO A HEARING ON DECEMBER 7, 2026	You may attend the Fairness Hearing where the Court will address any objections and determine whether the Settlement is fair, reasonable, and adequate and whether it should be approved by the Court.
DO NOTHING	If you do nothing, you remain a Dow and Huntsman Settlement Class Member, you give up the right to sue Dow and Huntsman about the claims resolved by this Settlement, and you will be legally bound by the Court's decisions and orders.

- These rights and options—and the deadlines for exercising them—are explained in this Notice.
- The Court in charge of this case still must decide whether to approve the Settlement.

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BASIC INFORMATION

1. Why was this Notice issued?

A federal Court authorized this notice because you have a right to know about the proposed Settlement of this class action (the “Litigation”) and about all of your options before the Court decides whether to grant final approval of the Settlement. This Notice explains the Litigation, the Settlement, what the Settlement provides, and your legal rights.

Judge W. Scott Hardy of the United States District Court for the Western District of Pennsylvania is overseeing this Litigation which is called *In re: Diisocyanates Antitrust Litigation*, Master Docket Misc. No. 18-1001, MDL No. 2862. The companies or entities that filed this Litigation are called the “Plaintiffs” and the companies they sued are called the “Defendants.” In this case, the Defendants are BASF Corporation, BASF SE, Covestro LLC, The Dow Chemical Company, Huntsman Corporation, Huntsman International LLC, and Wanhua Chemical (America) Co., Ltd.

This proposed Settlement is with The Dow Chemical Company (“Dow”), Huntsman International LLC, and Huntsman Corporation (“Huntsman,” collectively with Dow, “Defendants Dow and Huntsman” or the “Settling Defendants”). Previous settlements were reached with BASF Corporation, BASF SE, Covestro LLC, and Wanhua Chemical (America) Co., Ltd.

2. What is this Litigation about?

In this multi-district antitrust litigation, the Plaintiffs allege that, from January 1, 2016 through December 31, 2019, Dow and Huntsman conspired with other chemical manufacturer Defendants to fix prices and restrict the supply of methylene diphenyl diisocyanate (MDI) and toluene diisocyanate (TDI) (the “Products”) resulting in higher prices for purchasers. The Products are industrial chemicals widely used in the production of polyurethanes for construction, automotive, furniture, and consumer goods. The Plaintiffs claim that the conspiracy included fixing, raising, maintaining, and/or stabilizing the price of the Products sold in or shipped to the United States through agreements to limit supply of MDI and TDI by planned manufacturing shutdowns at plants worldwide and implementing coordinated pricing increases, in violation of the Sherman Act, 15 U.S.C. § 1.

Dow and Huntsman have denied any liability and any wrongdoing. Both sides have agreed to a Settlement to avoid the risks and costs of continuing the Litigation.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people or entities with similar claims. These individuals who sue are known as “class representatives” or, in this case, the Plaintiffs. Together, the people included in the class action are called a “Settlement Class” or “Settlement Class Members.” One court resolves the lawsuit for all Settlement Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement.

In this Litigation, the Named Plaintiffs are Utah Foam Products, Inc., Rhino Linings Corporation, Tri-Iso Tryline LLC, and American Polymers Corporation.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or Dow and Huntsman. Dow and Huntsman deny all claims and contend that they have not violated any laws. The Plaintiffs and Dow and Huntsman agreed to a Settlement to avoid the costs and risks of a trial. The Plaintiffs and their attorneys, who also represent Dow and Huntsman Settlement Class Members as “Class Counsel,” think the Settlement is best for all Dow and Huntsman Settlement Class Members.

WHO IS IN THE SETTLEMENT CLASS?

5. Who is included in the Dow and Huntsman Settlement Class?

All persons and entities in the United States, its territories, and/or the District of Columbia who purchased or received directly (including through controlled subsidiaries, agents, affiliates and/or joint ventures) the Products⁵ from any of (1) Defendants,⁶ Covestro AG, Wanhua Chemical Group Co., Ltd., Mitsui Chemicals, Inc., Mitsui Chemicals America, Inc., MCNS (a.k.a. Mitsui Chemicals & SKC Polyurethanes, Inc.), or MCNS Polyurethanes USA Inc., or (2) the subsidiaries, affiliates, or successors of any of the foregoing, at any time during the Class Period.⁷

6. Are there exceptions to being included?

Yes, excluded from the Dow and Huntsman Settlement Class are (1) the Defendants named in the Complaint and/or any complaint filed in the Class Actions, alleged co-conspirators, and any of their parents, subsidiaries or affiliates, (2) state and federal governmental entities, (3) all judicial officers presiding over this action and their immediate family members and staff, and any juror assigned to this action, and (4) any Dow and Huntsman Settlement Class Members who timely and validly exclude themselves from the Dow and Huntsman Settlement Class.

THE SETTLEMENT

7. What does the Settlement provide?

Under this Settlement, Dow and Huntsman have agreed to pay \$20,000,000⁸ into a Fund for payments to Dow and Huntsman Settlement Class Members, Court-approved attorneys' fees, costs and expenses, service awards, and notice and administration costs. Dow and Huntsman have also agreed to use reasonable best efforts to authenticate a number of documents previously provided in the Litigation.

Dow and Huntsman Settlement Class Members may submit a Claim Form to receive a *pro rata* (proportional) share of the Fund after court-approved attorneys' fees, costs, and expenses, service awards, and notice and administration costs are deducted (the "Net Fund"). Payment amounts will be based on the court-approved Plan of Allocation and the amount of the Products purchased. "Products" means any and all kinds of methylene diphenyl diisocyanate ("MDI") and toluene diisocyanate ("TDI"), no matter the trade name under which the purchased product was sold.

8. What claims am I releasing if I stay in the Dow and Huntsman Settlement Class?

Unless you exclude yourself, you are staying in the Dow and Huntsman Settlement Class. If the Settlement is approved and becomes final, all of the Court's orders will apply to you and legally bind you. You will not be able to sue, continue to sue, or be part of any other lawsuit against Dow and Huntsman and the certain released parties (the "Releasees") for the claims made in this Litigation or released by the Settlement Agreement. The Release and Discharge section in the Settlement Agreement describes the legal claims that you give up if you remain in the Dow and Huntsman Settlement Class. The Settlement Agreement can be found at www.DiisocyanatesAntitrustLitigation.com.

HOW TO GET A PAYMENT – MAKING A CLAIM

9. How do I submit a claim for a payment?

If you did not submit a Claim Form and/or Purchase Audit Request Form in conjunction with the BASF, Covestro, and Wanhua settlements, you must submit a Claim Form or Purchase Audit Request Form by

⁵ Products mean any and all kinds of methylene diphenyl diisocyanate ("MDI") and toluene diisocyanate ("TDI"), no matter the trade name under which such product is sold.

⁶ "Defendants" means all those entities set forth in Paragraph 13 of the Dow and Huntsman Settlement Agreement.

⁷ The Class Period runs from January 1, 2016 up to and including the Execution Date of the Settlement, which is July 29, 2026.

⁸ The Dow Chemical Company will contribute \$14,000,000 to the Fund and Huntsman International LLC will contribute \$6,000,000.

October 19, 2026 to receive a payment. Both forms may be submitted online at **www.DiisocyanatesAntitrustLitigation.com** or mailed to the Settlement Administrator at:

In re: Diisocyanates Antitrust Litigation
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

Each Dow and Huntsman Settlement Class Member was sent a Class Notice and a Claim Form that included the amount(s) of the Products they purchased, if known, from the Defendants during the Class Period based on the Defendants' records. If you agree with the amount(s), no additional documentation is required and you do not need to submit a Purchase Audit Request Form. To receive a *pro rata* payment, simply complete, sign, and submit the Claim Form.

If you wish to amend and/or supplement the purchase amount(s) provided on your Claim Form, you must complete a Purchase Audit Request Form and provide supporting documentation (e.g., purchase orders, sales receipts, etc.). If you do not, your *pro rata* payment amount will be based on the amounts provided in the Class Notice according to the Defendants' records.

The easiest way to submit a Claim Form or amend your purchase amount(s) is online at www.DiisocyanatesAntitrustLitigation.com using the Class ID number provided on the Class Notice you received.

Please visit the Settlement Website or contact the Settlement Administrator to request a Claim Form, Purchase Audit Request Form, or your Class ID number.

10. When will payments be distributed?

The short answer is – after the Settlement is “finally approved” and challenges, if any, to that approval are finally resolved. The Court is scheduled to hold a Fairness Hearing on **December 07, 2026, at 1:00 p.m.**, to decide whether to approve the Settlement, how much attorneys' fees, costs, and expenses (including fees, costs, and expenses of experts) to award to Class Counsel for representing the Dow and Huntsman Settlement Class, and Service Award payments to the Plaintiffs who brought this Litigation on behalf of the Dow and Huntsman Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. The Plan of Allocation will be implemented and payments distributed as soon as possible, if and when the Court grants final approval of the Settlement and after any appeals are resolved.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

Yes, the Court appointed Megan E. Jones of Hausfeld LLP, Jason S. Hartley of Hartley LLP, and William Pietragallo, II of Pietragallo Gordon Alfano Bosick & Raspanti, LLP as Class Counsel. You will not be charged directly for these lawyers. They will receive compensation from the Fund, as approved by the Court. If you want to be represented by your own lawyer, you may hire one at your own expense.

12. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

13. How will the lawyers be paid?

Class Counsel will ask the Court to approve attorneys' fees, costs, and expenses, including fees, costs, and expenses of experts, of up to one-third of the Fund (the “Fee and Expense Award”), for representing the Plaintiffs and the Dow and Huntsman Settlement Class in this Litigation. Class Counsel will also ask the Court to approve \$15,000 Service Awards for each of the Plaintiffs for their efforts in representing the Dow and Huntsman Settlement Class.

Questions? Call (833) 930-0157 or visit www.DiisocyanatesAntitrustLitigation.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I opt out of the Settlement?

If you want to keep the right to sue or continue to sue Dow and Huntsman for the claims in this Litigation or released by the Settlement Agreement, you must take steps to get out of the Settlement. This is called excluding yourself or “opting out” of the Settlement.

To exclude yourself from the Dow and Huntsman Settlement Class, you must submit a written request for exclusion that includes:

- A statement indicating that you want to be excluded from the Dow and Huntsman Settlement Class, such as, “I hereby request to be excluded from the proposed Dow and Huntsman Settlement Class in *In re: Diisocyanates Antitrust Litigation*, Master Docket Misc. No. 18-1001, MDL No. 2862”;
- Your name, company name, address, telephone number, and email address; and
- Your signature.

Your request for exclusion must be mailed to the Settlement Administrator at the address below, postmarked no later than **October 19, 2026**.

In re: Diisocyanates Antitrust Litigation
c/o Kroll Settlement Administration LLC
ATTN: Request for Exclusion
P.O. Box 225391
New York, NY 10150-5391

If you submit a request for exclusion from the Dow and Huntsman Settlement Class, you may revoke that request and remain in the Dow and Huntsman Settlement Class by mailing a written revocation of your request for exclusion to the Settlement Administrator at the address above, provided that your written request for revocation is received no later than **December 3, 2026**.

Defendants Dow and Huntsman or Class Counsel may dispute requests for exclusion in accordance with the Notice Plan approved by the Court.

OBJECTING TO THE SETTLEMENT

15. How do I tell the Court if I do not like the Settlement?

If you are a Dow and Huntsman Settlement Class Member and you do not opt out, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it. Through an objection, you can give reasons why you think the Court should not approve the Settlement. You may also appear at the Fairness Hearing, either in person or through an attorney, at your own expense. Objections must be submitted in writing and must include:

- The case name and number *In re: Diisocyanates Antitrust Litigation*, Master Docket Misc. No. 18-1001, MDL No. 2862;
- Your name, address, telephone number, and email address and the name, address, and telephone number of your attorney (if any);
- A statement of whether you intend to appear at the Fairness Hearing, either personally or through an attorney;
- Proof of membership in the Dow and Huntsman Settlement Class;
- The specific grounds for your objection and any reasons why you want to appear and be heard, as well as all documents or writings that you want the Court to consider; and
- Your signature.

Objections must be filed with the Court no later than **October 19, 2026**.

Joseph F. Weis, Jr. Courthouse
Clerk of the Court
700 Grant Street
Pittsburgh, PA 15219

A copy of your objection also must be mailed to Class Counsel, Counsel for Dow, Counsel for Huntsman, and the Settlement Administrator at the addresses below, postmarked no later than **October 19, 2026**.

Co-Lead Class Counsel	Counsel for Settling Defendants	Settlement Administrator
Jason S. Hartley HARTLEY LLP 101 W. Broadway, Suite 820 San Diego, CA 92101 Megan E. Jones HAUSFELD LLP 580 California St., 12th Fl. San Francisco, CA 94104 William Pietragallo, II PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP One Oxford Centre, 38th Floor Pittsburgh, PA 15219	Counsel for Dow: Daniel E. Laytin, P.C. KIRKLAND & ELLIS LLP 333 West Wolf Point Plaza Chicago, IL 60654 Counsel for Huntsman: Zachary K. Warren WILLIAMS & CONNELLY LLP 680 Maine Ave., SW Washington, DC 20024	<i>In re: Diisocyanates Antitrust Litigation</i> c/o Kroll Settlement Administration LLC ATTN: Objections P.O. Box 225391 New York, NY 10150-5391

16. What is the difference between objecting and opting out?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from it. Excluding yourself from the Settlement means telling the Court you do not want to be part of the Settlement. If you exclude yourself or opt out of the Settlement with Dow and Huntsman, you cannot object to it because the Settlement with Dow and Huntsman no longer affects you.

THE COURT'S FAIRNESS HEARING

17. When and where is the Court's Fairness Hearing

The Court is scheduled to hold a Fairness Hearing on **December 7, 2026, at 1:00 p.m. ET, at 1:00 p.m. ET**, at the United States District Court for the Western District of Pennsylvania, Joseph F. Weis, Jr. Courthouse, 700 Grant Street, Pittsburgh, PA 15219, to address any written objections from Dow and Huntsman Settlement Class Members who included their intent to appear in their objection (see Question 15). The Court will also decide whether to approve the proposed Settlement as fair, reasonable, and adequate to the Dow and Huntsman Settlement Class, the request for attorneys' fees, costs, and expenses of up to one-third of the Fund and the \$15,000 Service Awards for each of the Plaintiffs. The date and time of this hearing may change without further notice. Please check **www.DiisocyanatesAntitrustLitigation.com** for updates.

18. Do I have to come to the Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense. If you file an objection, you may, but you do not have to come to the Fairness Hearing to talk about it. If you file your written objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

Questions? Call (833) 930-0157 or visit www.DiisocyanatesAntitrustLitigation.com.

IF YOU DO NOTHING

19. What happens if I do nothing?

If you are a Dow and Huntsman Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against Dow and Huntsman and the Releasees, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Release and Discharge in the Settlement Agreement.

GETTING MORE INFORMATION

20. How do I get more information?

This notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement and Plan of Allocation. The Settlement Agreement, Plan of Allocation, and other related documents are available at the Settlement Website **www.DiisocyanatesAntitrustLitigation.com**.

If you have additional questions or need to update your address, you may contact the Settlement Administrator toll free at **(833) 930-0157** or by mail at *In re: Diisocyanates Antitrust Litigation*, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391.