

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 9, 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 Wanhua Chemical (America) Co., Ltd. (the “Settling Defendant” or “WCA”) in a consolidated class action lawsuit that alleges that, from January 1, 2016 through July 9, 2026, WCA 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. WCA has 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, and Covestro LLC.
- The Litigation will continue against the other Defendants: Dow Chemical Company, Huntsman Corporation, and Huntsman International LLC.
- The WCA Settlement Class includes all persons and entities in the United States, its territories, and/or the District of Columbia who purchased directly (including through controlled subsidiaries, agents, affiliates and/or joint ventures) the Products¹ from any of (1) current or former Defendants in the Action² or (2) the subsidiaries, affiliates, or successors of any of the foregoing, at any time during the Class Period.³ The WCA 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 WCA Settlement Class further excludes state and federal government entities. The WCA 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, WCA has agreed to pay \$7,750,000 into a Fund for payments to WCA Settlement Class Members, court-approved attorneys’ fees, costs, and expenses, service awards, and notice and administration costs. WCA has 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 13, 2026	If you decide to exclude yourself, you will keep the right to sue WCA 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 WCA related to the legal claims released by this Settlement.
OBJECT TO THE SETTLEMENT BY OCTOBER 13, 2026	If you do not exclude yourself from the WCA 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.
SUBMIT A CLAIM BY OCTOBER 13, 2026	Submit a claim to receive a distribution from the Fund as outlined in the Settlement Agreement and Court-approved Plan of Allocation.

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 12 of the WCA Settlement Agreement.

³ The Class Period runs from January 1, 2016 up to and including the Execution Date of the Settlement, which is July 9, 2026.

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

YOUR LEGAL RIGHTS AND OPTIONS	
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 WCA Settlement Class Member, you give up the right to sue WCA about the claims resolved by this Settlement, and you will be legally bound by the Court's decisions and orders. You must submit a claim to receive any distribution as a Class Member, however.

- 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, Dow Chemical Company, Huntsman Corporation, Huntsman International LLC, and Wanhua Chemical (America) Co., Ltd.

This proposed Settlement is with Wanhua Chemical (America) Co., Ltd. (the “Settling Defendant” or “WCA”). Previous settlements were reached with BASF Corporation, BASF SE, and Covestro LLC.

The Litigation will continue against Dow Chemical Company, Huntsman Corporation, and Huntsman International LLC.

2. What is this Litigation about?

In this multi-district antitrust litigation, the Plaintiffs allege that, from January 1, 2016 through July 9, 2026, WCA 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.

WCA has 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 WCA. WCA denies all claims and contends that it has not violated any laws. The Plaintiffs and WCA agreed to a Settlement to avoid the costs and risks of a trial. The Plaintiffs and their attorneys, who also represent WCA Settlement Class Members as “Class Counsel,” think the Settlement is best for all WCA Settlement Class Members.

WHO IS IN THE SETTLEMENT CLASS?

5. Who is included in the WCA Settlement Class?

All persons and entities in the United States, its territories, and/or the District of Columbia who purchased directly (including through controlled subsidiaries, agents, affiliates and/or joint ventures) the Products⁴ from any of (1) current and former Defendants in the Action⁵ or (2) the subsidiaries, affiliates, or successors of any of the foregoing, at any time during the Class Period.⁶

6. Are there exceptions to being included?

Yes, excluded from the WCA 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 WCA Settlement Class Members who timely and validly exclude themselves from the WCA Settlement Class.

THE SETTLEMENT

7. What does the Settlement provide?

Under this Settlement, WCA has agreed to pay \$7,750,000 into a Fund for payments to WCA Settlement Class Members, Court-approved attorneys' fees, costs, and expenses, service awards, and notice and administration costs. WCA has also agreed to use reasonable best efforts to authenticate a number of documents previously provided in the Litigation.

WCA 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 WCA Settlement Class?

Unless you exclude yourself, you are staying in the WCA 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 WCA 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 WCA 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 and Covestro settlements, you must submit a Claim Form or Purchase Audit Request Form by **October 13, 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

⁴ 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.

⁵ "Defendants" means all those entities set forth in Paragraph 12 of the WCA Settlement Agreement.

⁶ The Class Period runs from January 1, 2016 up to and including the Execution Date of the Settlement, which is July 9, 2026.

Each WCA 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 WCA Settlement Class, and Service Award payments to the Plaintiffs who brought this Litigation on behalf of the WCA Settlement Class.

If the Court approves the Settlement, there could 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 WCA Settlement Class in this Litigation. Class Counsel will also ask the Court to approve \$15,000 Service Awards for each of the Named Plaintiffs from this Settlement for their efforts in representing the WCA Settlement Class.

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 WCA 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 WCA Settlement Class, you must submit a written request for exclusion that includes:

- A statement indicating that you want to be excluded from the WCA Settlement Class, such as, “I hereby request to be excluded from the proposed WCA 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 13, 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 WCA Settlement Class, you may revoke that request and remain in the WCA 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**.

WCA and Class Counsel may dispute requests for exclusion in accordance with the Notice Plan approved by the Court.

If you are a member of the WCA Settlement Class and exclude yourself, you may be eligible to participate in (or exclude yourself from) any additional settlements which may arise with any other Defendants in the case.

OBJECTING TO THE SETTLEMENT

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

If you are a WCA 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 WCA 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 13, 2026**.

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

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

A copy of your objection also must be mailed to Class Counsel, Counsel for WCA, and the Settlement Administrator at the addresses below, postmarked no later than **October 13, 2026**.

Co-Lead Class Counsel	Counsel for WCA	Settlement Administrator
Megan E. Jones HAUSFELD LLP 580 California St., 12th Fl. San Francisco, CA 94104 Jason S. Hartley HARTLEY LLP 101 W. Broadway, Suite 820 San Diego, CA 92101 William Pietragallo, II PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP One Oxford Centre, 38th Floor Pittsburgh, PA 15219	Craig P. Seebald Brian D. Schnapp Charles L. Wesley VINSON & ELKINS LLP 2200 Pennsylvania Ave., N.W. Suite 500 West Washington, DC 20037 Nicole Castle VINSON & ELKINS LLP 1114 Avenue of the Americas 32nd Floor New York, NY 10036	<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 WCA, you cannot object to it because the Settlement with WCA 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 WCA 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 WCA 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.

IF YOU DO NOTHING

19. What happens if I do nothing?

If you are a WCA 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 WCA 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. You will, however, need to submit a claim in order to receive any portion of the Settlement if you remain a Class Member.

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

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.