

If you formerly lived in Sudan or South Sudan between November 4, 1997 and December 31, 2011 and have refugee or asylum status in the United States, a class action lawsuit may affect your rights

A United States Federal Court authorized this notice. This is not a solicitation.

- The lawsuit claims that the French bank BNP Paribas, S.A. (“BNPP SA”) and its U.S. affiliate BNP Paribas US Wholesale Holdings, Corp. (f/k/a BNP Paribas North America, Inc.) (“BNPP US”) (together the “Defendants”), knowingly funded the Government of Sudan’s campaign of persecution and human rights abuses, between November 4, 1997 and December 31, 2011. The lawsuit claims that the Defendants provided the Government of Sudan (“GOS”) with access to billions of U.S. dollars, in violation of U.S. sanctions laws. The lawsuit also claims that this money contributed to the scale and magnitude of the Government of Sudan’s human rights abuses, and that the Defendants knew or should have known that this would occur. The lawsuit further claims that Defendants’ support helped the Government of Sudan fund its armed forces, including the Janjaweed militia and the Sudanese National Intelligence and Security Services (“NISS”); obtain armored vehicles; and maintain airfields used to bomb civilians. The Defendants deny these allegations.
- The Court has certified a class action for all those found by the United States to be refugees or asylees, who formerly lived in Sudan or South Sudan between November 4, 1997 and December 31, 2011. The refugees and asylees who are included in the case are called “Class Members,” defined more fully in the answer to Question 10, below. The lawsuit claims that the Class Members were subjected to human rights abuses by the Government of Sudan and forcibly displaced from Sudan and unable to return to their home and country, and that many Class Members also suffered additional injuries. The Defendants deny that they are responsible for the alleged forcible displacement and other injuries of every refugee and asylee who lived in Sudan over a fourteen-year time period.

Class Members who suffered injuries by the Government of Sudan’s military, security services, police, or militias, including the Janjaweed, **MUST complete an opt-in form and a questionnaire online by midnight ET on July 1, 2025. Even if you have provided information to Class Counsel in the past, you MUST complete the opt-in form and the questionnaire by midnight ET on July 1, 2025.**

Personally identifiable information you provide will be protected and kept confidential by order of the Court, and will be available only to Professor Daniel Capra, the Special Master appointed by the Court, the Court, and internal and external legal counsel for the parties in this lawsuit.

Instructions for how to access the opt-in form and the questionnaire are available at www.kashefvpnpp.com (Sudanese Arabic available).

- This notice is being provided to you following the Court’s decision to certify a class action. Defendants deny all allegations of wrongdoing specific to this lawsuit and no judge or jury has concluded that Defendants are liable for the claims in the lawsuit. For this reason, there is no money available now and no guarantee there ever will be.

- If you are a Class Member, however, you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS	
THE RIGHT TO BE EXCLUDED FROM THE CLASS ACTION	<p>Get out of this lawsuit. Get no money compensation from it if any is ultimately awarded. Keep the right to sue separately with a different lawyer.</p> <p>If you ask to be excluded from the lawsuit and money is later awarded, you will not be eligible to share in that money. But you will keep any rights to sue the Defendants separately over the legal claims in this lawsuit. To bring your own case against the Defendants, you must find a new attorney, or proceed without an attorney. If you want to file your own suit, please be aware that there is a statute of limitations that is as short as two days after you submit your opt-out notice; consult your lawyer quickly. If you wish to be excluded, you must complete an opt-out form online by midnight ET on July 1, 2025.</p>
THE RIGHT TO DO NOTHING AND REMAIN IN THE CASE	<p>Stay in this lawsuit. Await the outcome. Give up the right to sue separately.</p> <p>If you are in the Class and do nothing, you will be bound by any final judgment, but you will not be able to seek any money compensation for the injuries you have suffered if you do not complete the opt-in form and the questionnaire online by midnight ET on July 1, 2025.</p>
THE RIGHT TO SEEK MONEY COMPENSATION FOR YOUR INJURIES	<p>Stay in this lawsuit. Seek money compensation for your injuries.</p> <p>IF:</p> <ul style="list-style-type: none"> Between November 4, 1997 and December 31, 2011 You suffered injuries or lost property By the Government of Sudan’s military, security services, police, or militias, including the Janjaweed <p>THEN:</p> <ul style="list-style-type: none"> You may be able to seek money compensation if you complete the opt-in form and the questionnaire by midnight ET on July 1, 2025.

- Your options are explained in this notice. To ask to be excluded, you must act before **midnight ET on July 1, 2025**.
- You have a lawyer in this case. The Court appointed Kathryn Lee Boyd, of Hecht Partners LLP, and Michael Hausfeld, of Hausfeld LLP, to represent Class Members (the “Class Counsel”) at the trial. You do not need to get your own lawyer, but you may do so if you wish.

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BASIC INFORMATION

1. Why was this notice issued?

A Court has established, or “certified,” this case as a class action lawsuit.

If you are a Class Member, you have legal rights and options before the Court decides whether the claims being made on your behalf are correct. This notice explains all of these things.

Judge Alvin K. Hellerstein of the United States District Court for the Southern District of New York (the “Court”) is currently overseeing this case. The case is known as *Kashef v BNP Paribas SA* 16 Civ. 3228(AKH). The people who sued are called the Plaintiffs. There are two Defendants: the French bank BNP Paribas SA (“BNPP SA”), and its U.S. affiliate, BNP Paribas U.S. Wholesale Holdings, Corp. (f/k/a BNP Paribas North America, Inc.) (“BNPP US”) (together the “Defendants”).

2. What is a class action?

In a class action, one or more people called “Class Representatives” sue on behalf of people who have similar claims, called the “Class” or “Class Members.” One court resolves the issues for all Class Members, except for those who exclude themselves from the Class.

The Court decided that claims in this lawsuit can proceed as a class action.

3. Is there any money available now?

No. The Court has not decided yet whether the Defendants are responsible for Class Members’ injuries and losses, or whether any Class Members are entitled to money compensation, so there is no money available to the Class at this time and no guarantee that there ever will be.

You **MUST complete an opt-in form and a questionnaire online by midnight ET on July 1, 2025** if you want to seek money compensation for your injuries. More information on this is detailed below at Questions 5 and 6.

WHAT THE LAWSUIT IS ABOUT

4. What is this lawsuit about?

In this lawsuit, Plaintiffs claim that Defendants knowingly funded the Government of Sudan’s human rights abuses, between November 4, 1997 and December 31, 2011. Plaintiffs claim that Defendants provided the Government of Sudan with access to billions of U.S. dollars in violation of U.S. sanctions laws. Plaintiffs allege that this money contributed to the scale and magnitude of the Government of Sudan’s human rights abuses, and that Defendants knew or should have known that this would occur. Defendants deny these allegations.

The Court has certified a class action for those found by the United States to be refugees or asylees who formerly lived in Sudan or South Sudan between November 4, 1997 and December 31, 2011. The refugees and asylees who are included in the case are called “Class Members,” defined more fully in the answers to Questions 10 and 11, below. The lawsuit claims that Class Members were forcibly displaced from Sudan and unable to return to their home and country and that many Class Members also suffered additional injuries. The lawsuit further claims that the Defendants’ support helped the Government of Sudan fund its armed forces, including the Janjaweed militia and the Sudanese National Intelligence and Security Services (“NISS”); obtain armored vehicles; and maintain airfields used to bomb civilians. Defendants deny that they are responsible for the alleged forcible displacement

and other injuries of every refugee and asylee who formerly lived in Sudan over a fourteen-year time period.

The Third Amended Complaint and the Plaintiffs' Opposition to Defendants' Motion for Summary Judgment include long and detailed descriptions of the allegations against Defendants.

Class Members who suffered injuries by the Government of Sudan's military, security services, police, or militias, including the Janjaweed, **MUST complete an opt-in form and answer a questionnaire online by midnight ET on July 1, 2025. Even if you have provided information to Class Counsel in the past, you MUST complete the opt-in form and answer the questionnaire online at www.kashefvbnpp.com by midnight ET on July 1, 2025.**

Personally identifiable information you provide will be protected and kept confidential by order of the Court, and will be available only to Professor Daniel Capra, the Special Master appointed by the Court, the Court, and internal and external legal counsel for the parties in this lawsuit.

Instructions for accessing and completing the opt-in form and the questionnaire are available at www.kashefvbnpp.com (Sudanese Arabic available).

5. Does this lawsuit seek money compensation for physical injuries and other trauma I may have suffered?

This lawsuit seeks money for Class Members based on Defendants' alleged conduct, which Plaintiffs claim caused Class Members to suffer forced displacement and other injuries.

Class Members who suffered injuries by the Government of Sudan's military, security services, police, or militias, including the Janjaweed, **MUST complete an opt-in form and answer a questionnaire online by midnight ET on July 1, 2025. Even if you have provided information to Class Counsel in the past, you MUST complete the opt-in form and answer the questionnaire by midnight ET on July 1, 2025.**

Personally identifiable information you provide will be protected and kept confidential by order of the Court, and will be available only to Professor Daniel Capra, the Special Master appointed by the Court, the Court, and internal and external legal counsel for the parties in this lawsuit.

Instructions for accessing and completing the opt-in form and the questionnaire are available at www.kashefvbnpp.com (Sudanese Arabic available).

6. If I suffered injury or other trauma, is there something I should do?

Class Members who suffered injuries by the Government of Sudan's military, security services, police, or militias, including the Janjaweed, **MUST complete an opt-in form and a questionnaire online by midnight ET on July 1, 2025.**

Even if you have provided information to Class Counsel in the past, you MUST complete the opt-in form and the questionnaire.

Instructions for accessing and completing the opt-in form and the questionnaire online are available at www.kashefvbnpp.com (Sudanese Arabic available).

Personally identifiable information you provide will be protected and kept confidential by order of the Court, and will be available only to the Special Master, the Court, and internal and external legal

counsel for the parties in this lawsuit.

If you do not complete the opt-in form and the questionnaire online by midnight ET on July 1, 2025 you will not be able to seek money compensation for your injuries and losses.

7. What are the Plaintiffs asking for?

The lawsuit seeks the following:

- Final decision and judgment be entered against Defendants determining that they are responsible for Plaintiffs' injuries, as alleged in the Third Amended Complaint;
- An award of money damages to the full extent legally available; and
- Further relief as the Court may deem just and proper.

More information about the lawsuit is in the Third Amended Complaint.

8. What do the Defendants say?

Defendants deny all of Plaintiffs' allegations. Defendants deny that the financial services provided to Sudanese banks and commercial entities contributed to the injuries alleged by Plaintiffs, including forcible displacement and other injuries. Defendants further deny knowledge of any purported connection between these injuries and the financial services provided.

9. Has the Court decided who has won the case?

No. The Court has not yet decided whether the Class Members or Defendants win the lawsuit.

WHO IS IN THE CLASS

10. How do I know if I am part of this Class Action?

The Court has decided that everyone who fits the following description is a Class Member (part of the case):

All refugees or asylees admitted by the United States who formerly lived in Sudan or South Sudan between November 4, 1997 and December 31, 2011.

11. I'm still not sure if I am included in the Class.

If you are still not sure whether you are included in the Class, you can visit the website www.kashefvbnpp.com.

YOUR RIGHTS AND OPTIONS

If you are a Class Member, you must decide whether to stay in this case and complete an opt-in form and answer a questionnaire or whether to exclude yourself before the trial. You have to decide this no later than **midnight ET on July 1, 2025**.

12. What happens if I do nothing at all?

If you are a Class Member and you do nothing, you will stay in the Class. You will be legally bound by the results of the trial. But you will not be able to seek money compensation for the injuries you have

suffered if you do not complete an opt-in form and answer a questionnaire and provide the necessary information before **midnight ET on July 1, 2025**.

13. What happens if I exclude myself?

If you exclude yourself from the Class and the Class obtains any money compensation, you will not be eligible to claim any of that money. You also will not be legally bound by the outcome of the trial if you exclude yourself, including to the extent the jury rules in favor of Defendants. You will be able to sue (or continue to sue) Defendants on your own about the legal claims that are involved in this case, now or in the future, assuming your claims are not time-barred or otherwise prohibited (you should immediately consult your own attorney to make such a determination).

14. How do I request to be excluded?

To exclude yourself from this Class Action, you must complete an opt-out form that is available on the website www.kashefvpnpp.com by **midnight ET on July 1, 2025**.

THE LAWYERS REPRESENTING THE CLASS IN THIS CASE

15. Do I have a lawyer in this case?

Yes. The Court appointed Kathryn Lee Boyd of Hecht Partners LLP and Michael Hausfeld of Hausfeld LLP to represent you as “Class Counsel.” You do not have to pay Class Counsel out of your own pocket. If you want to be represented by another lawyer and have that lawyer appear in court for you in this case, you may hire one at your own expense.

16. How will the lawyers be paid?

If Class Counsel obtains money compensation for the Class, the lawyers may ask the Court for fees and expenses. You will not have to pay these fees and expenses out of your own pocket. If the Court grants their request, the fees and expenses would either be deducted from any money obtained for the Class or paid separately by Defendants.

17. May I get my own lawyer?

If you are a Class Member, you are not required to hire your own lawyer because Class Counsel is working on your behalf. But if you want your own lawyer, you are entitled to retain one at your own expense.

TRIAL

18. How and when will the Court decide who wins?

If the case is not settled, the Plaintiffs will have to prove their case at a trial. During the trial, a jury will hear evidence in order to determine whether the Plaintiffs or Defendants are right about the claims in the lawsuit. There is no guarantee that the Plaintiffs will win any money compensation.

There may also be negotiations to settle all Class Members’ claims for money compensation.

19. Do I have to come to the trial?

You will not need to attend the trial in New York unless you choose to do so or you are required to attend by the Court. You and/or your own lawyer are welcome to attend at your own expense.

20. Will I get money after the trial?

If the jury in the trial finds in favor of Class Members, you will be notified about the additional trials or procedures you must follow in order to pursue your individual claims, including whether you need to submit additional information, in English and/or in Sudanese Arabic, which will be posted on the website www.kashefvbnpp.com as it becomes available. You can access the website whether you stay in the lawsuit or exclude yourself.

Class Members who suffered injuries by the Government of Sudan's military, security services, police, or militias, including the Janjaweed, MUST complete an opt-in form and answer a questionnaire by midnight ET on July 1, 2025. Even if you have provided information to Class Counsel in the past, you MUST complete the opt-in form and the questionnaire, to be sent to the Special Master.

Personally identifiable information you provide will be protected and kept confidential by order of the Court, and will be available only to Professor Daniel Capra, the Special Master appointed by the Court, the Court, and internal and external legal counsel for the parties in this lawsuit.

Instructions for accessing and completing the opt-in form and the questionnaire are available at www.kashefvbnpp.com (Sudanese Arabic available).

If you have any questions, please call Class Counsel Kathryn Lee Boyd at +1 (332) 334-7771 or Michael Hausfeld at +1 (771) 333-6786 (Sudanese interpreters available).