

United States District Court for the Eastern District of Pennsylvania

**PLEASE READ THIS NOTICE CAREFULLY. IT RELATES
TO THE PROPOSED SETTLEMENT OF A CLASS ACTION AND
CONTAINS IMPORTANT INFORMATION ABOUT YOUR RIGHTS.**

The District Court has authorized this notice. It is not a solicitation from a lawyer.

This notice does not, however, constitute the findings of the Court. It should not be understood to be an expression of the Court's views on the merits of any claim or defense raised by the parties.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
You May:		Due Date:
Do Nothing	<i>Remain in the Class.</i> If you do nothing, you will receive your share of the settlement if the Court grants final approval. You do not need to file a claim or do anything else to participate in the settlement or to receive a settlement payment. <i>See Question V.</i>	<u>None.</u>
Exclude Yourself	<i>Get out of the Class.</i> You can write and ask to get out of the Class and keep your right to sue on your own about the claims in the lawsuit. <i>See Question VIII.</i>	<u>Postmarked By February 2, 2026</u>
Object to the Proposed Settlement	<i>Object or comment on the proposed settlement.</i> If you don't exclude yourself, you can appear and speak in the lawsuit on your own or through your own lawyer to object to or comment on the proposed settlement. <i>See Question IX.</i>	<u>Postmarked By February 2, 2026</u>

I. What is this notice about?

This notice is being sent to notify you of a settlement of a class action lawsuit (the "Class Action") filed in the United States District Court for the Eastern District of Pennsylvania, entitled *CamCara, Inc. (d/b/a AST Manufacturing) v. Air Products and Chemicals, Inc.*, No. 5:21-cv-02264-JLS, alleging, among other things, that Air Products and Chemicals, Inc. ("Air Products" or "Defendant") violated § 2-305 of the Uniform Commercial Code ("U.C.C.") by failing to exercise good faith in connection with product surcharges that were assessed between June 1, 2018, and August 31, 2020. Defendant denies all allegations in the Class Action.

The Court has not decided who is right. Instead, the parties have agreed to settle the case to avoid the cost and risk of continued litigation. The Court has preliminarily approved the settlement. The purpose of this notice is to inform you of the Class Action and the proposed settlement.

II. What is a class action lawsuit?

In a class action, one or more people (in this case, CamCara, Inc., the "Class Representative"), sue on behalf of people who have similar claims. All these people are a class or class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

III. Who is in the Settlement Class?

The Settlement Class includes all current and former Air Products' customers with Ship-To Locations in the United States who, between June 1, 2018, and August 31, 2020, inclusive (the "Class Period"), incurred two or more increases to the Product-Surcharge Rate assessed by Air Products at any given ship-to location.

Excluded from the Settlement Class are Defendant and its subsidiaries and affiliates and any persons or entities who or which exclude themselves by submitting a timely and valid request for exclusion that is accepted by the Court.

IV. Why is there a proposed settlement?

The Court has not decided in favor of either side in the Class Action. The Class Representative and Class Counsel believe the claims have merit. Defendant denies all allegations of wrongdoing or liability and further contends that its conduct was lawful. Defendant is settling to avoid the expense, inconvenience, and inherent risk of litigation with respect to the Class Action. The Class Representative and Class Counsel believe that the proposed settlement is in the best interest of the Settlement Class because it provides appropriate recovery for class members now, while avoiding the risk, expense, and delay of pursuing the case through trial and any appeals, including the possibility of no recovery at all.

V. How do I receive a settlement payment?

Defendant has agreed to pay two million dollars (\$2,000,000) to settle the Class Action. **You do not need to file a claim or do anything else to participate in this proposed settlement or to receive a settlement payment.** If the settlement is approved, your settlement payment will be mailed to you at the address Defendant has on file for your account(s) or that is otherwise known to the settlement administrator. You are responsible for any taxes that may be due on your settlement payment(s), and you should consult with your own accountants or other tax professionals to determine what, if any, taxes may be owed.

VI. How much will my payment be?

Your payment will be calculated based on your share of the total qualifying product surcharges imposed by Defendant on members of the Settlement Class during the Class Period. The net settlement fund (after payment of attorneys' fees, costs, expenses, and other amounts approved by the Court) will be distributed among class members according to a plan of allocation, proposed by Class Counsel and approved by the Court, based on each Class Member's proportional amount of "qualifying surcharges" members of the Settlement Class incurred during the Class Period.

"Qualifying Surcharges" means, for each Settlement Class Member, the dollar amounts of product surcharges attributable to each increase in the Product-Surcharge Rate beyond the first increase imposed by Air Products at each of that Class Member's Ship-To Locations during the Class Period.

VII. What am I giving up to stay in the Settlement Class?

Unless you exclude yourself, you are staying in the Settlement Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against Defendant about the claims in this case. It also means that all of the Court's orders will apply to you and legally bind you.

If you don't want a payment from this settlement, but you want to keep the right to sue or continue to sue Defendant, on your own, about claims asserted in this case, then you must take steps to get out. This is called excluding yourself—or is sometimes referred to as opting out of the Settlement Class.

VIII. How do I get out of the settlement

To exclude yourself from the Settlement Class, you must send a letter by mail saying that you want to be excluded from the settlement in *CamCara, Inc. (d/b/a AST Manufacturing) v. Air Products and Chemicals, Inc.*, No. 5:21-cv-02264-JLS. Be sure to include your name, business name, address, telephone number, and your signature. You must mail your exclusion request postmarked no later than **February 2, 2026**, to: **CamCara v. Air Products Exclusions, P.O. Box 59479, Philadelphia, PA 19102-9479**. You may also get an Exclusion Request form at the website,

www.airproductsclassaction.com You cannot exclude yourself on the phone or by e-mail. If you ask to be excluded, you will not get any settlement payment, and you cannot object to the settlement. You will not be legally bound by anything that happens in this lawsuit.

IX. How can I object to the settlement?

If you are a Settlement Class member (and you do not exclude yourself), then you can comment in opposition to the proposed settlement, including the amount requested for attorneys' fees, costs, and expenses any service award to the Class Representative. This is known as an objection, and you have the right to appear before the Court to express your opposition. Your written objection in opposition to the settlement must be submitted in writing and filed with the Court by **February 2, 2026**. Objections must be either (a) mailed to: Clerk of the Court, U.S. District Court, The Gateway Building, 201 Penn Street, Reading, PA 19601; or (b) filed online at <https://ecf.paed.uscourts.gov/cgi-bin/login.pl>.

You must also send copies of your written objection to the parties' attorneys at the following addresses:

Class Counsel

Mathew P. Jasinski
MOTLEY RICE LLC
20 Church Street, 17th Floor
Hartford, CT 06103
Telephone: (860) 882-1681
Facsimile: (860) 882-1682
mjasinski@motleyrice.com

Defendant's Counsel

William R. Cruse
BLANK ROME LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103-6998
Telephone: (215) 569-5500
Facsimile: (215) 569-5555
william.cruse@blankrome.com

To be valid and considered by the Court, any such written objection must state: (1) the name and case number of the Class Action: *CamCara, Inc. (d/b/a AST Manufacturing) v. Air Products and Chemicals, Inc.*, No. 5:21-cv-02264-JLS; (2) your name, business name, address, and telephone number; (3) each objection you are making and the relief that you are requesting; and (4) whether you intend to appear, either in person or through counsel, at the final approval hearing. You may, but need not, file and serve your objection through counsel of your choice and you may, but need not, appear at the final approval hearing either in person or through personal counsel hired at your expense. If you make your objection or appearance at the final approval hearing through an attorney, you will be responsible for your personal attorney's fees and costs. Also, if you intend to appear at the final approval hearing through counsel hired at your expense, you must identify the counsel's name, address, and telephone number in your written objection.

If you do not exclude yourself or object as described above, you will be deemed to have released the claims at issue against Defendant as explained below and will otherwise be bound by the settlement.

X. When and where is the final approval hearing?

The final approval hearing has been set for **March 12, 2026, at 11:00 a.m. before the Honorable Jeffrey L. Schmehl of the United States District Court for Eastern District of Pennsylvania, in The Gateway Building, Suite 518, 201 Penn Street, Reading, PA 19601**. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check ahead or visit the settlement website www.airproductsclassaction.com for updates. At the final approval hearing, the Court will hear any comments from the parties or objections concerning the fairness of the proposed settlement, including the amount requested for attorneys' fees, costs, and expenses and any Service Award to the Class Representative. At this hearing the Court will consider whether the proposed settlement is fair, reasonable, and adequate. The Court will also consider how much Class Counsel may receive in fees and reimbursement for their expenses and how much the Class Representative may receive as a service award, all to be paid from the settlement amount. If there are objections or comments, the Court will consider them at this time.

You do not need to attend the final approval hearing to remain a class member or to obtain any benefits under the proposed settlement. You or your own attorney may attend the hearing if you wish, at your own expense. You do not need to attend this hearing to have a properly filed and served written objection considered by the Court. After the hearing, the Court will decide whether to approve the Settlement.

XI. What is the effect of final settlement approval?

IF THE COURT APPROVES THE PROPOSED SETTLEMENT AFTER THE FINAL APPROVAL HEARING, IT WILL ENTER A JUDGMENT DISMISSING THE CLASS ACTION WITH PREJUDICE AND RELEASING ALL RELATED CLAIMS OF CLASS MEMBERS AGAINST DEFENDANT BASED ON THE ALLEGATIONS IN THE CLASS ACTION, AND THE PROPOSED SETTLEMENT WILL BE EACH CLASS MEMBER'S SOLE MECHANISM FOR OBTAINING ANY RELIEF FROM DEFENDANT WITH RESPECT TO THESE CLAIMS.

All Settlement Class members and their respective agents, heirs, executors, administrators, successors, assigns, guardians, and representatives will release and forever discharge (a) Defendant; (b) Defendant's past, present, and future parent corporation(s); (c) Defendant's past, present, and future affiliates, subsidiaries, divisions, joint ventures, predecessors, successors, successors-in-interest, and assigns; and (d) with respect to (a) through (c) above, its past, present and future members of its respective boards of directors, managers, partners, agents, members, shareholders (in their capacity as such), officers, employees, independent contractors, representatives, attorneys, administrators, fiduciaries, accountants, auditors, advisors, consultants, personal representatives, spouses, heirs, executors, administrators, associates, and all persons acting on their behalf from any and all claims and causes of action of every nature and description, whether known or unknown, contingent or absolute, mature or not mature, liquidated or unliquidated, accrued or not accrued, concealed or hidden, regardless of legal or equitable theory and whether arising under federal, state, common, or foreign law, that: (a) the Class Representative or any other class member asserted in the Class Action; or (b) the Class Representative or any other class member could have asserted in the Class Action or in any forum that arise out of, are based upon, or relate to, both (1) the allegations, transactions, facts, matters or occurrences, representations or omissions involved, set forth, or referred to in the First Amended Complaint filed in the Class Action or (2) Air Products' imposition of product surcharges during the Class Period; or (c) relate to (1) the plan of allocation or (2) the calculation of a Class Member's individual payment (the "Settled Claims").

If the proposed settlement is not approved, the case will proceed as if no settlement had occurred. There can be no assurance that if the settlement is not approved and the case resumes that Settlement Class members will recover more than what is provided for under the settlement or will recover anything at all.

XII. Who represents the Settlement Class?

The Court appointed the following lawyers ("Class Counsel") as counsel for the Settlement Class:

William H. Narwold
Mathew P. Jasinski
Jessica Colombo
MOTLEY RICE LLC
20 Church Street, 17th Floor
Hartford, CT 06103
Telephone: (860) 882-1681
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Philadelphia, PA 19103
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mquirk@motleyrice.com

From the beginning of the case to the present, Class Counsel have not received any payment for their services in pursuing this case or in obtaining this proposed settlement, nor have they been reimbursed for any out-of-pocket costs or expenses they have incurred. Class Counsel will apply to the Court for an award of attorneys' fees in an amount of up to 33⅓ percent of the total settlement amount, for reimbursement of costs and expenses incurred in the action of up to \$410,000, and for a service award to the Class Representative of up to \$10,000. If the Court approves Class Counsel's motion for fees and costs and a service award for the Class Representative, Class Counsel and the Class Representative will be paid from the Settlement Fund. Class members will not have to pay anything directly toward the fees or costs of Class Counsel. You do not need to hire your own lawyer because Class Counsel is working on your behalf and will seek final approval of the settlement on behalf of the Class members. You may hire your own lawyer to represent you in this case if you wish, but it will be at your own expense.

XIII. Where can I get more information about the lawsuit and the proposed settlement?

This notice provides only a summary of the matters relating to the Settlement. More detailed information is provided in the settlement agreement at the website www.airproductsclassaction.com. To see the complete case file, including the settlement agreement and all other documents filed in the Class Action, you may examine the court file at the office of the Clerk of the Court in The Gateway Building, 201 Penn Street, Reading, PA 19601.

PLEASE DO NOT CONTACT THE COURT (INCLUDING THE CLERK OF THE COURT OR THE JUDGE) OR DEFENDANT WITH QUESTIONS ABOUT THE SETTLEMENT OR THE LAWSUIT

Dated: December 4, 2025

BY ORDER OF THE UNITED STATES DISTRICT COURT