

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

If you are of non-Indian national origin and were involuntarily terminated in the U.S. by Larsen & Toubro Infotech Limited or Larsen & Toubro Infotech LLC between October 9, 2015 and February 23, 2023, a class action lawsuit may affect your rights.

A court authorized this notice. This is not a solicitation from a lawyer.

- A former non-Indian employee has sued Larsen & Toubro Infotech Limited and Larsen & Toubro Infotech LLC (“LTI”) alleging that the company terminated him and others for discriminatory reasons including national origin as set forth in the First Amended Complaint.
- LTI denies that it has discriminated in any way against these employees. The company strongly maintains that it treats all employees fairly and without regard to national origin or any other protected status under law.
- The parties in this lawsuit have reached a settlement on behalf of a class of non-Indian former employees of LTI who were involuntarily terminated by the company between October 9, 2015 and February 23, 2023.
- The Court has not decided whether LTI did anything wrong and will not make such a determination. Rather, the Court has (1) made an initial evaluation of the parties’ settlement and determined it to be fair; (2) granted preliminary and final approval of the settlement and certified a terminations class; (3) appointed Plaintiff Andrew Ragland as Class Representative and his counsel, Kotchen & Low LLP, as class counsel; and (4) approved this Notice being sent to you.
- While you previously received Notice of this class action settlement, this second Notice is being sent to you because the class definition was slightly modified at the final fairness hearing to include only those of non-Indian national origin, the settlement structure was amended to a single monetary relief class, and the settlement no longer includes injunctive relief.
- You may be eligible for monetary relief pursuant to this settlement if you qualify as a member of the class, defined as follows:
 - All individuals of non-Indian national origin who were involuntarily terminated by LTI between October 9, 2015 and February 23, 2023.

Your legal rights are affected, and you have a choice to make now:

Any questions? Read on and visit www.LTI-Settlement.com

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

Ask To Be Included, Provide A Valid Claims Form, Receive A Monetary Award, and Be Bound by the Settlement	<p>Stay in this lawsuit. Participate in the settlement by submitting a claims form. Obtain a monetary award. Give up certain rights.</p> <p>To participate in the settlement, you must provide the Settlement Administrator with a completed claims form that certifies that you are non-Indian and provides your national origin. By participating in the lawsuit as a class member, you will receive an equal share of the Settlement Award.</p> <p>In participating in the settlement, you give up any rights to sue LTI separately about the same type of legal claims or arising out of the same type of events at issue in this lawsuit.</p>
Do Nothing, Stay in the Lawsuit, Receive No Monetary Award, Be Bound by the Settlement.	<p>Do nothing. Stay in this lawsuit. Give up certain rights.</p> <p>If you choose to do nothing, you are still a member of the class, but will not be entitled to any monetary award having not submitted a valid claims form.</p> <p>By remaining in the settlement class, you give up any rights to sue LTI separately about the same type of legal claims or arising out of the same type of events at issue in this lawsuit.</p>
Ask To Be Excluded	<p>Get out of this settlement. Get no benefits from it. Keep your rights.</p> <p>If you ask to be excluded by submitting a timely exclusion request or exclusion form to the Settlement Administrator, you keep any right to sue LTI separately about the same legal claims in this lawsuit. However, you will lose the ability to recover any money and benefits in this lawsuit.</p>
Object to the Settlement	<p>Object to the terms of the settlement. Stay in this lawsuit.</p> <p>If you wish to object to the settlement, you may do so in writing postmarked or otherwise returned (via facsimile or email) to the Settlement Administrator, LTI Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173132, Milwaukee, WI 53217, info@LTI-Settlement.com on or before September 27, 2023. The Court will consider your objections, but because the Court has already granted final approval, if you do not want to be part of the settlement class, you must also ask to be excluded from the settlement as well.</p> <p>If you do not ask to be excluded, you will be part of the settlement class even if you object. As such, you may be entitled to compensation as indicated above and you give up any rights to sue LTI separately about the same type of legal claims or arising out of the same type of events at issue in this lawsuit.</p>

- Your options are explained in this notice.

- To ask to be included in the settlement, to object to the settlement, or to be excluded from the settlement, you must act before the close of the notice period, **September 27, 2023**. All claims forms, objections, and Requests for Exclusion must postmarked or otherwise received by the Settlement Administrator by this date.
- Monetary awards will be provided to Class Members shortly after the close of the notice period.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION	- 5 -
1. Why did I get this notice?.....	- 5 -
2. What is this lawsuit about?.....	- 5 -
3. What is a class action and who is involved?	- 5 -
THE CLAIMS IN THE LAWSUIT	- 6 -
4. What are the claims at issue in the lawsuit?.....	- 6 -
5. How does LTI answer?.....	- 6 -
6. Has the Court decided who is right?.....	- 6 -
WHO IS IN THE CLASS	- 6 -
7. Am I part of this Class?.....	- 6 -
8. I'm still not sure if I'm included.....	- 7 -
YOUR RIGHTS AND OPTIONS	- 7 -
9. What are my options for participating in the settlement?	- 7 -
10. How do I participate in the settlement?	- 7 -
11. What happens if I do nothing at all?	- 7 -
12. How do I object to the settlement?	- 8 -
13. Why would I ask to be excluded?.....	- 8 -
14. How do I ask the Court to exclude me from the Class?	- 9 -
15. What happens to any unclaimed Class settlement funds?	- 9 -
THE LAWYERS REPRESENTING YOU.....	- 9 -
16. Do I have a lawyer in this case?	- 9 -
17. Should I get my own lawyer?	- 9 -
18. How will the lawyers be paid?.....	- 9 -
THE SETTLEMENT PROCEDURE.....	- 10 -
19. What was the procedure for approving and finalizing the settlement?	- 10 -
20. What is the status of the settlement?.....	- 10 -
21. Is there any money available now?.....	- 10 -
22. When was the final approval hearing?.....	- 10 -
23. When will I receive money from the settlement fund?.....	- 11 -
GETTING MORE INFORMATION.....	- 11 -
24. Are more details available?.....	- 11 -

BASIC INFORMATION

1. Why did I get this notice?

You are receiving this notice because a settlement has been reached in a lawsuit titled *Markus Meyenhofer & Andrew Ragland v. Larsen & Toubro Infotech Limited and Larsen & Toubro Infotech LLC*, No. 19-CV-9349 (AKH) (S.D.N.Y.) on behalf of a class of former non-Indian employees who were involuntarily terminated by LTI in the U.S. between October 9, 2015 and February 23, 2023. Judge Alvin K. Hellerstein of the United States District Court for the Southern District of New York in Manhattan, NY is overseeing this class action, and has granted preliminary and final approval of the settlement.

You may have previously received Notice of this class action settlement. This second Notice is being sent to you because the class was modified at the final fairness hearing to only include involuntarily terminated individuals who are of non-Indian national origin, the settlement structure was amended to a single monetary relief class, and the settlement no longer includes injunctive relief.

You are receiving this Notice because LTI's records show that you were involuntarily terminated by the company in the U.S. between October 9, 2015 and February 23, 2023 and you did not respond to the first Notice. Accordingly, if you are non-Indian, and were terminated by LTI during this period (known as the "class period"), you may be entitled to participate in a settlement that may affect you and your rights. This notice does not apply to you if you are Indian and/or were not involuntarily terminated by LTI in the U.S. between October 9, 2015 and February 3, 2023.

2. What is this lawsuit about?

The lawsuit alleges that LTI discriminated against employees, including non-Indian employees based on their national origin, in its termination decisions, resulting in higher termination rates for those allegedly discriminated against. LTI denies these allegations and maintains that it does not discriminate against any employees for any reason. The Court has not decided whether LTI has in fact discriminated against anyone. Without any admission of fault or liability, the parties have reached a settlement in this lawsuit on behalf of a class of involuntarily terminated LTI employees.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called "Class Representatives" (in this case Andrew Ragland) sue on behalf of other people who may have similar claims. The people together are a "Class" or "Class Members." The Class Representative who sued on behalf of the Class is called the "Plaintiff." The companies he sued (in this case Larsen & Toubro Infotech Limited and Larsen & Toubro Infotech LLC) are called the "Defendants." The settlement reached in this case impacts everyone in the Class—except for those people who choose to exclude themselves from the Class.

THE CLAIMS IN THE LAWSUIT

4. What are the claims at issue in the lawsuit?

In this lawsuit, Plaintiff claims that LTI has discriminated against employees, including non-Indians, resulting in higher termination rates for these individuals. Specifically, Plaintiff's First Amended Complaint alleges that LTI prioritizes, among others, employees of Indian national origin for U.S. positions. Plaintiff's First Amended Complaint further alleges that, as a result, non-Indian employees are terminated at higher rates compared to Indian employees. Plaintiff brings claims against LTI for alleged violations of the Civil Rights Act of 1866, as amended (42 U.S.C. § 1981) and Title VII of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000e, *et seq.*). You can read the First Amended Class Action Complaint and the Court's Order Granting Preliminary Approval of the Settlement at www.LTI-Settlement.com.

5. How does LTI answer?

LTI denies that it has discriminated against any employee or that it engages in policies or practices that result in higher termination rates for certain groups of individuals. LTI maintains that its employment policies and decisions are based on individual qualifications, merits, employee skills, and location preferences, and customer input. LTI further maintains that its termination rates are not disproportionate based on any protected status under law, including national origin. LTI has only agreed to certify a class for the purposes of this settlement. You can read LTI's Answer to the Plaintiff's First Amended Class Action Complaint at www.LTI-Settlement.com.

6. Has the Court decided who is right?

The Court has not decided whether the Plaintiff or LTI is correct. By granting preliminary and final approval of the settlement and allowing the issuance of this Notice, the Court has only made a determination that the settlement is fair to the Class and that it is able, for the purposes of settlement only and based on a joint motion by the Plaintiffs and LTI, to certify the class.

WHO IS IN THE CLASS

You need to decide whether you are affected by this settlement.

7. Am I part of this Class?

The class includes the following individuals: All individuals of non-Indian national origin who were involuntarily terminated by LTI between October 9, 2015 and February 23, 2023.

8. I'm still not sure if I'm included.

If you are still not sure whether you are included in the settlement class, you can get free help by calling or writing to the lawyers in this case for Plaintiff and the Class, at (202) 471-1995 or ClassCounsel@kotchen.com.

YOUR RIGHTS AND OPTIONS

You have to decide whether to participate in the settlement or ask to be excluded from it. You have to decide this now.

9. What are my options for participating in the settlement?

All individuals who qualify as members of the class as defined in Question 7 are entitled to participate in the settlement, object to the settlement, or ask to be excluded from it.

10. How do I participate in the settlement?

If you want to stay in the class, participate in the settlement, and receive a monetary award, you must submit a completed and signed claims form to the Settlement Administrator by first-class United States mail (postage prepaid), facsimile, email, or the Settlement Administrator's website by the close of the notice period, **September 27, 2023**. Your submission must be postmarked or otherwise received by the Settlement Administrator by this date.

LTI Settlement Administrator
c/o A.B. Data, Ltd.
P.O. Box 173132
Milwaukee, WI 53217
info@LTI-Settlement.com

Keep in mind that if you participate in the Class, you will not be able to sue, or continue to sue, LTI—as part of any other lawsuit—about the same type of legal claims arising out of the same type of events at issue in this lawsuit. You will also be legally bound by any order of the Court.

11. What happens if I do nothing at all?

If you take no action at all, you will remain in the class, but will not receive a monetary award.

Keep in mind that if you choose to do nothing now, and remain in the Class, you will not be able to sue, or continue to sue, LTI—as part of any other lawsuit—about the same type of legal claims or arising out of the same type of events at issue in this lawsuit. You will also be legally bound by any order of the Court.

12. How do I object to the settlement?

You have the right to object to the settlement.

For your objection to be valid, it must be in writing and postmarked or otherwise returned (via facsimile or email) to the Settlement Administrator (at the addresses provided above) no later than the close of the notice period, **September 27, 2023**. Class Counsel will file such objections with the Court.

Keep in mind that, if you do not request to be excluded from the Class in accordance with Paragraph 14 (below), because the Court has already granted final approval of the settlement, the settlement will apply to you even though you have objected to it. If you do not request to be excluded from the Class, you will not be able to sue, or continue to sue, LTI—as part of any other lawsuit—about the same type of legal claims or arising out of the same type of events at issue in this lawsuit. You will also be legally bound by the Court’s order granting final approval of the settlement.

If you do not want to be bound by this lawsuit, you will also need to ask to be excluded.

13. Why would I ask to be excluded?

You may wish to be excluded if:

- You already have your own race or national origin discrimination lawsuit against LTI and want to continue with it;
- You intend to file your own race or national origin discrimination lawsuit against LTI and do not want to participate in this class action settlement;
- You do not want to have any involvement with this case; or
- You do not believe you were discriminated against.

If you exclude yourself from the Class—sometimes called “opting-out” of the Class—you won’t get any money or benefits from this lawsuit, nor will you be bound by any of the Court’s orders or judgments in this case.

If you would like to raise your own legal claims against LTI, you need to ask to be excluded from the settlement. Although some discrimination laws afford mechanisms for the payment of attorneys’ fees on behalf of employees who proceed on an individualized basis and prevail, you’ll have to hire and pay your own lawyer for that lawsuit, unless you decide to represent yourself, and you’ll have to prove your liability claims separately from this lawsuit. If you do exclude yourself so you can raise your own legal claims against LTI, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

14. How do I ask the Court to exclude me from the Class?

To ask to be excluded, you must submit a written, signed statement to the Settlement Administrator by first-class United States mail (postage prepaid), facsimile, or email that: (1) includes your name, address, and telephone number; and (2) unconditionally states an intention to opt out of the Settlement, such as: “I opt out of the class action settlement with LTI” or “I request to be excluded from the class action settlement with LTI.” You may also submit the Exclusion form provided with this notice or available on the Settlement Administrator’s website. All Requests for Exclusion must be postmarked or otherwise received by the Settlement Administrator by the close of notice period, **September 27, 2023**. All Class Members who ask to be excluded will be excluded by the Court from the settlement.

15. What happens to any unclaimed Class settlement funds?

Any uncashed class member checks will be redistributed equally to members of the class who submitted valid claims forms, except that if the total of such uncashed checks amounts to less than \$10.00 per class member, or if funds remain after one hundred eighty (180) calendar days after such re-distribution, then such balance shall be donated to Code.org.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this case?

The Court decided that lawyers from the law firm Kotchen & Low LLP are qualified to represent you and all Class Members in this settlement and appointed them as “Class Counsel.” They are experienced in handling similar cases against other employers. More information about these lawyers, their experience, and their law firm is available at www.kotchen.com. Attorneys from Kotchen & Low LLP can be contacted at (202) 471-1995 or ClassCounsel@kotchen.com.

17. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you have the right to obtain one. However, you will likely have to pay for that lawyer yourself. You can ask your own lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you.

18. How will the lawyers be paid?

The Court has granted an award of attorneys’ fees and costs associated with their pursuit of this lawsuit. The Court has granted an award of \$1,550,000 as attorneys’ fees (one-third of the \$4.65 million settlement fund) and for reimbursement of costs and expenses estimated at \$15,931.69. You won’t have to pay these fees and expenses as a member of the class. Such costs will be deducted from the settlement fund, prior to the fund’s allocation to Class Members.

THE SETTLEMENT PROCEDURE

19. What was the procedure for approving and finalizing the settlement?

Class-wide settlements such as this must be approved by the Court in two stages. First, the Court grants preliminarily approval of the settlement, making an initial determination that the settlement is fair to the Class and that the Court is likely, for the purposes of settlement only and based on a joint motion by the Plaintiffs and LTI, to be able to grant class certification. Preliminary approval of the settlement was granted on February 23, 2023 and a Notice of the settlement was sent to potential class members.

Class Members then had the opportunity to ask to be included in the settlement, to object to the settlement, or to be excluded from it, during the notice period. After the notice period closed, the Court held a final approval hearing where Class Members had the opportunity to be heard and to voice their approval or disapproval of the settlement. No objections were made to the settlement. The Court then granted final approval of the settlement.

At the final fairness hearing on August 9, 2023 (continued from July 27), the Court modified the class definition and instructed that this second notice be sent to you.

After the close of the second notice period, settlement funds will be distributed to class members who submitted valid claims forms.

20. What is the status of the settlement?

The Court has granted preliminary and final approval of the settlement and authorized the distribution of this Notice.

The Court's Order, containing information concerning the Court's preliminary and final approval of the settlement can be found here: www.LTI-Settlement.com.

21. Is there any money available now?

Because the Court has granted final approval of the settlement, money is available now. However, it will not be distributed until the notice period closes.

22. When was the final approval hearing?

The final approval hearing took place on July 27, 2023 (continued to August 9, 2023) at Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14D, New York, NY 10007-1312 before Judge Alvin K. Hellerstein. No class members objected to the settlement in writing or at that hearing.

23. When will I receive money from the settlement fund?

Settlement award checks will be mailed to all class members who provided valid claims forms within approximately forty-five (45) days of this notice.

GETTING MORE INFORMATION

24. Are more details available?

You may speak to Class Counsel (Plaintiff's lawyers) by calling (202) 471-1995 or emailing ClassCounsel@kotchen.com. You can also obtain additional information at www.LTI-Settlement.com.

You should not contact the Court, LTI or its attorneys about this matter.

Notice ID: <<NoticeID>>

Markus Meyenhofer & Andrew Ragland v. Larsen & Toubro Infotech Ltd. and Larsen & Toubro Infotech LLC, Case No. 19-cv-9349 (AKH), United States District Court for the Southern District of New York

SETTLEMENT CLAIMS FORM

To participate in the settlement and receive a monetary award, you must complete and submit this form, certifying under oath that you are not of Indian national origin, to the Settlement Administrator on or before **September 27, 2023**.

This claims form can be mailed to: LTI Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173132, Milwaukee, WI 53217, faxed to (414) 961-6679, or emailed to info@LTI-Settlement.com. This document can also be submitted on the Settlement Administrator's website, www.LTI-Settlement.com.

You must complete all information below and sign this form for it to be effective.

I, the undersigned, wish to be included in the terminations class certified by the Court in *Markus Meyenhofer & Andrew Ragland v. Larsen & Toubro Infotech Ltd. and Larsen & Toubro Infotech LLC*, Case No. 19-cv-9349 (AKH), as defined in the Class Notice I received. I hereby certify, under penalty of perjury, that I am of non-Indian national origin.

Name: _____

Address: _____

Phone: _____

Email: _____

My national origin is: _____

Signature: _____ Date: _____

Notice ID: <<NoticeID>>

REQUEST FOR EXCLUSION FROM CLASS ACTION

Meyenhofer, et al., v. Larsen & Toubro Infotech Limited, et al. (Case No. 1:19-cv-9349)

PLEASE READ THESE INSTRUCTIONS

If you wish to remain a member of this class action, DO NOT complete this form.

If you want to exclude yourself from this class action (opt-out), complete this form and postmark or email it no later than September 27, 2023.

PERSONAL INFORMATION: Please print or type the following information.

Name: _____

Street Address: _____

City, State, Zip Code: _____

Email Address: _____

Telephone Number: _____

SELECT THE APPROPRIATE BOX AND SIGN

<input type="checkbox"/>	I want to be excluded from the Class in this action. I understand that: (1) I will not share in any recovery as a result of the settlement of this action; (2) I will not be bound by the settlement agreement terms; and (3) I may present any claims I have against the Defendants in the future by filing my own lawsuit at my own expense.
--------------------------	--

Signature: _____

Date: _____

SUBMISSION INSTRUCTIONS

This form must be emailed to **info@LTI-Settlement.com** on or before September 27, 2023 or mailed to the following address: LTI Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173132, Milwaukee, WI 53217, postmarked no later than September 27, 2023. **Please do not mail this form to the Court.**