

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
KLEOPATRA FINCO S.À R.L., <i>et al.</i> , ¹	)	Case No. 25-90642 (CML)
	)	
Debtors.	)	(Jointly Administered)
	)	

NOTICE OF FILING OF PLAN SUPPLEMENT

PLEASE TAKE NOTICE that, as contemplated by the *Joint Prepackaged Plan of Reorganization of Kleopatra Finco S.À R.L. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 5] (as may be amended or modified from time to time and including all exhibits and supplements thereto, the “Plan”),² on December 4, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the plan supplement (the “Plan Supplement”) with the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

PLEASE TAKE FURTHER NOTICE that the Plan Supplement includes current drafts of the following documents (which remain subject to ongoing review, revision, and further negotiation among the Debtors and interested parties in accordance with the Plan and the RSA), as may be modified, amended, or supplemented from time to time:

Exhibit A	Schedule of Retained Causes of Action
Exhibit B	Assumed Executory Contracts and Unexpired Leases List
Exhibit C	Rejected Executory Contracts and Unexpired Leases List
Exhibit D	Exit Financing Term Sheet
Exhibit E	Governance Term Sheet
Exhibit F	Restructuring Steps Plan

PLEASE TAKE FURTHER NOTICE that the Debtors and certain other parties-in-interest reserve all rights, subject and pursuant to the terms and conditions set forth in the Plan and the RSA, to alter, amend, modify, or supplement the Plan Supplement and any of the documents contained herein in accordance with the terms of the Plan, at any time before the Effective Date of the Plan or any such other date as may be provided for by the Plan or by order of the Court; *provided* that if any document in this Plan Supplement is altered, amended, modified,

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Klockner>. The location of Kleopatra Finco S.à r.l.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 46A, Avenue J.F. Kennedy, L-1855 Luxembourg, R.C.S. Luxembourg.

² Capitalized terms used but not defined in herein have the meanings given to them in the Plan.

or supplemented in any material respect prior to the Confirmation Hearing, the Debtors will file a redline of such document with the Court.

PLEASE TAKE FURTHER NOTICE that the Plan Supplement shall be deemed incorporated into and part of the Plan as if set forth therein in full. The documents contained in the Plan Supplement are integral to, and are considered part of, the Plan. If the Plan is approved, the documents contained in the Plan Supplement shall also be approved by the Court pursuant to the Confirmation Order. In the event of a conflict between the Plan and the Plan Supplement, the Plan Supplement shall control in accordance with Article I.G of the Plan (unless stated otherwise in such Plan Supplement document or in the Confirmation Order).

PLEASE TAKE FURTHER NOTICE that the Debtors will seek confirmation of the Plan and approval of the Disclosure Statement at the Confirmation Hearing to be held before the Honorable Christopher M. Lopez, Courtroom 402 of the United States Bankruptcy Court, Houston Division, 515 Rusk Street, Houston, Texas, 77002, on **December 16, 2025, at 1:00 p.m. (prevailing Central Time)**.

PLEASE TAKE FURTHER NOTICE THAT the deadline for filing objections to the Plan is **December 11, 2025, at 4:00 p.m. (prevailing Central Time)** (the “Plan Objection Deadline”). Any objection to the Plan *must*: (a) be in writing; (b) conform to the Bankruptcy Code, Bankruptcy Rules, the Bankruptcy Local Rules, and any orders of the Court; (c) state, with particularity, the basis and nature of any objection to the Plan and, if practicable, a proposed modification to the Plan that would resolve such objection; and (d) be filed with the Court on or before the Plan Objection Deadline.

PLEASE TAKE FURTHER NOTICE if you would like to obtain a copy of the Disclosure Statement, the Plan, the Plan Supplement, or related documents, you should contact Stretto, Inc., the claims and noticing retained by the Debtors in these chapter 11 cases (the “Claims and Noticing Agent”), by: (a) emailing KPinquiries@Stretto.com; or (b) calling the Debtors’ restructuring hotline at (833) 212-0915 (US toll free) or +1 (949) 273-2457 (international). You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <http://www.txs.uscourts.gov>. Copies of certain orders, notices, and pleadings, as well as other information regarding these chapter 11 cases, are also available for inspection free of charge online at <https://cases.stretto.com/Klockner>.

ARTICLE VIII OF THE PLAN CONTAINS RELEASE, EXCULPATION, AND INJUNCTION PROVISIONS, AND **ARTICLE VIIL.D CONTAINS A THIRD-PARTY RELEASE**. **THUS, YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.**

THIS NOTICE IS BEING SENT TO YOU FOR INFORMATIONAL PURPOSES ONLY. IF YOU HAVE QUESTIONS WITH RESPECT TO YOUR RIGHTS UNDER THE PLAN OR ABOUT ANYTHING STATED HEREIN OR IF YOU WOULD LIKE TO OBTAIN ADDITIONAL INFORMATION, CONTACT THE CLAIMS AND NOTICING AGENT.

Dated: December 4, 2025
Houston, Texas

/s/ John F. Higgins

PORTER HEDGES LLP

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*Proposed Co-Counsel for the Debtors
and Debtors in Possession*

Certificate of Service

I certify that on December 4, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins

John F. Higgins

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
KLEOPATRA FINCO S.À R.L., <i>et al.</i> , ¹	)	Case No. 25-90642 (CML)
	)	
Debtors.	)	(Jointly Administered)
	)	

**PLAN SUPPLEMENT FOR THE DEBTORS’
JOINT PREPACKAGED PLAN OF REORGANIZATION OF
KLEOPATRA FINCO S.À R.L. AND ITS DEBTOR AFFILIATES
PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE**

Table of Contents²

Exhibit A	Schedule of Retained Causes of Action
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¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Klockner>. The location of Kleopatra Finco S.à r.l.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 46A, Avenue J.F. Kennedy, L-1855 Luxembourg, R.C.S. Luxembourg.

² Capitalized terms used but not defined in herein have the meanings given to them in the Plan.

Certain documents, or portions thereof, contained in this Plan Supplement remain subject to continuing negotiations among the Debtors and interested parties with respect thereto. The Debtors reserve all rights to alter, amend, revise, or supplement the Plan Supplement, and any of the documents contained herein, at any time before the Effective Date of the Plan, or any such other date as may be provided for by the Plan or by order of the Bankruptcy Court. Each of the documents contained in the Plan Supplement or its amendments are subject to certain consent and approval rights to the extent provided in the Plan or the RSA.

Exhibit A

Schedule of Retained Causes of Action

Schedule of Retained Causes of Action

Article IV.Q of the Plan provides as follows:

In accordance with section 1123(b) of the Bankruptcy Code, but subject to Article VIII hereof, the Reorganized Debtors shall retain and may enforce all rights to commence and pursue, as appropriate, any and all Causes of Action whether arising before or after the Petition Date, including any actions specifically enumerated in the Schedule of Retained Causes of Action, and the Reorganized Debtors' rights to commence, prosecute, or settle such retained Causes of Action shall be preserved notwithstanding the occurrence of the Effective Date or any other provision of this Plan to the contrary, other than the Causes of Action released by the Debtors pursuant to the releases and exculpations contained in the Plan, including in Article VIII herein.

The Reorganized Debtors may pursue such retained Causes of Action, in accordance with the best interests of the Reorganized Debtors. **No Entity may rely on the absence of a specific reference in the RSA, this Plan, the Plan Supplement, or the Disclosure Statement to any Cause of Action against it as any indication that the Debtors or the Reorganized Debtors, as applicable, will not pursue any and all available retained Causes of Action against it. The Debtors and the Reorganized Debtors expressly reserve all rights to prosecute any and all retained Causes of Action against any Entity, except as otherwise expressly provided in this Plan.** The Reorganized Debtors may settle any such retained Cause of Action without further notice to or action, order, or approval of the Bankruptcy Court. Unless any retained Causes of Action against an Entity are expressly waived, relinquished, exculpated, released, compromised, or settled in this Plan or a Bankruptcy Court order, the Reorganized Debtors expressly reserve all retained Causes of Action, for later adjudication, and, therefore, no preclusion doctrine, including the doctrines of res judicata, collateral estoppel, issue preclusion, claim preclusion, estoppel (judicial, equitable, or otherwise), or laches, shall apply to such retained Causes of Action upon, after, or as a consequence of the Confirmation or Consummation.

The Reorganized Debtors reserve and shall retain such Causes of Action notwithstanding the rejection or repudiation of any Executory Contract or Unexpired Lease during the Chapter 11 Cases or pursuant to this Plan. In accordance with section 1123(b)(3) of the Bankruptcy Code, any retained Causes of Action that a Debtor may hold against any Entity shall vest in the corresponding Reorganized Debtor, except as otherwise expressly provided in this Plan, including Article VIII hereof, or pursuant to the Bankruptcy Court order. The Reorganized Debtors, through their authorized agents or representatives, shall retain and may exclusively enforce any and all such retained Causes of Action. The Reorganized Debtors shall have the exclusive right, authority, and discretion to determine and to initiate, file, prosecute, enforce, abandon, settle, compromise, release, withdraw, or litigate to judgment any such retained Causes of Action and to decline to do any of the foregoing without the consent or approval of any third party or further notice to or action, order, or approval of the Bankruptcy Court.

1. Claims Related to Insurance Policies

Unless otherwise released by the Plan, the Debtors expressly reserve all Causes of Action based in whole or in part upon any and all insurance contracts and insurance policies to which any Debtor or Reorganized Debtor is a party or pursuant to which any Debtor or Reorganized Debtor has any rights whatsoever, regardless of whether such contract or policy is specifically identified in the Plan, this Plan Supplement, or any amendments thereto, including, without limitation, Causes of Action against insurance carriers, reinsurance carriers, insurance brokers, underwriters, occurrence carriers, or surety bond issuers relating to coverage, indemnity, contribution, reimbursement, or any other matters. Without limiting the generality of the foregoing, the Debtors expressly reserve all Causes of Action against the Entities identified in **Exhibit (A)(i)** attached hereto.

2. Claims Related to Taxing Authorities

Unless otherwise released by the Plan, the Debtors expressly reserve all Causes of Action based in whole or in part upon any and all tax obligations to which any Debtor or Reorganized Debtor is a party or pursuant to which any Debtor or Reorganized Debtor has any rights whatsoever, including, without limitation, against or related to all Entities that owe or that may in the future owe money related to tax refunds to the Debtors or the Reorganized Debtors, regardless of whether such Entity is specifically identified herein. Without limiting the generality of the foregoing, the Debtors expressly reserve all Causes of Action against the Entities identified in **Exhibit (A)(ii)** attached hereto.

3. Claims, Defenses, Cross-Claims, and Counter-Claims Related to Litigation and Possible Litigation

Unless otherwise released by the Plan, the Debtors expressly reserve all Causes of Action against or related to all Entities that are party to or that may in the future become party to litigation, arbitration, or any other type of adversarial proceeding or dispute resolution proceeding, whether formal or informal or judicial or non-judicial, regardless of whether such Entity is specifically identified in the Plan, this Plan Supplement, or any amendments thereto. Without limiting the generality of the foregoing, the Debtors expressly reserve all Causes of Action against the Entities identified in **Exhibit (A)(iii)** attached hereto.

4. Claims Related to Accounts Receivable and Accounts Payable

Unless otherwise released by the Plan, the Debtors expressly reserve all Causes of Action against or related to all Entities that owe or that may in the future owe money to the Debtors or Reorganized Debtors, regardless of whether such Entity is expressly identified in the Plan, this Plan Supplement, or any amendments thereto. Furthermore, the Debtors expressly reserve all Causes of Action against or related to all Entities who assert or may assert that the Debtors or Reorganized Debtors, as applicable, owe money to them.

5. Claims Related to Deposits, Adequate Assurance, and Other Collateral Postings

Unless otherwise released by the Plan, the Debtors expressly reserve all Causes of Action based in whole or in part upon any and all postings of a security deposits, adequate assurance payment, or any other type of deposit, prepayment, or collateral, regardless of whether such

posting of security deposit, adequate assurance payment, or any other type of deposit, prepayment or collateral is specifically identified herein.³

6. Claims Related to Liens

Unless otherwise released by the Plan, the Debtors expressly reserve all Causes of Action based in whole or in part upon any and all liens regardless of whether such lien is specifically identified herein.

7. Claims Related to Contracts and Leases

Unless otherwise released by the Plan, the Debtors or Reorganized Debtors, as applicable, expressly reserve Causes of Action based in whole or in part upon any and all contracts, leases, joint operating agreements, and similar instruments, to which any of the Debtors or Reorganized Debtors is a party or pursuant to which any of the Debtors or Reorganized Debtors has any rights whatsoever (regardless of whether such contract or lease is specifically identified in the Plan, this Plan Supplement, or any amendments thereto), including without limitation all contracts and leases that are assumed pursuant to the Plan or were previously assumed by the Debtors. The claims and Causes of Action reserved include, but are not limited to, Causes of Action against vendors, suppliers of goods and services, lessors, lessees, and licensees, or any other parties: (a) for overpayments, back charges, duplicate payments, improper holdbacks, deductions owing or improper deductions taken deposits, warranties, guarantees, indemnities, recoupment, reimbursement, or setoff; (b) for wrongful or improper termination, suspension of services or supply of goods, or failure to meet other contractual or regulatory obligations; (c) for failure to fully perform or to condition performance on additional requirements under contracts with any one or more of the Debtors before the assumption or rejection, if applicable, of such contracts; (d) for payments, deposits, holdbacks, reserves or other amounts owed by any creditor, utility, supplier, vendor, insurer, surety, factor, lender, bondholder, lessor or other party; (e) for any liens, including mechanics', artisans', materialmens', possessory or statutory liens held by any one or more of the Debtors; (f) arising out of environmental or contaminant exposure matters against landlords, lessors, environmental consultants, environmental agencies or suppliers of environmental services or goods; (g) for counter-claims and defenses related to any contractual obligations; (h) for any turnover actions arising under section 542 or 543 of the Bankruptcy Code; and (i) for unfair competition, interference with contract or potential business advantage, breach of contract, infringement of intellectual property or any business tort claims.

³ For the avoidance of doubt, the Debtors reserve all rights with respect to any deposit provided in accordance with the *Order (I) Approving the Debtors' Utility Services Requests and (II) Granting Related Relief* [Docket No. 91] or otherwise provided as "adequate assurance of payment" (as that term is used by Section 366 of the Bankruptcy Code).

Exhibit A(i)

Causes of Action Related to Insurance Policies

Exhibit A(i)
Causes of Action Related to Insurance Policies

Name of Counterparty	Nature
ACE AMERICAN INSURANCE COMPANY 436 WALNUT STREET PHILADELPHIA, PA 19106 UNITED STATES	Causes of Action Related to Insurance Policies
ALLIANZ INSURANCE PLC. 57 LADYMEAD GUILDFORD, GU1 1DB UNITED KINGDOM	Causes of Action Related to Insurance Policies
ALLIANZ INSURANCE PLC. ALLIANZ HOUSE ELM PARK MERRION ROAD DUBLIN 4, D04 Y6Y6 IRELAND	Causes of Action Related to Insurance Policies
AMERICAN INTERNATIONAL GROUP UK LIMITED THE AIG BUILDING 58 FENCHURCH STREET LONDON, EC3M 4AB UNITED KINGDOM	Causes of Action Related to Insurance Policies
AVIVA INSURANCE LIMITED 80 FENCHURCH STREET LONDON, EC3M 4AE UNITED KINGDOM	Causes of Action Related to Insurance Policies
AXA XL INSURANCE COMPANY UK LIMITED 20 GRACECHURCH STREET LONDON, EC3V 0BG UNITED KINGDOM	Causes of Action Related to Insurance Policies
BEAZLEY SYNDICATES AFB 22 BISHOPSGATE LONDON, EC2N 4BQ UNITED KINGDOM	Causes of Action Related to Insurance Policies
BERKSHIRE HATHAWAY EUROPEAN INSURANCE DAC 7 GRAND CANAL STREET LOWER 2ND FLOOR DUBLIN, D02 KW81 IRELAND	Causes of Action Related to Insurance Policies
BLUNICHE RISK SERVICES LIMITED 1ST FLOOR 8 LLOYD'S AVENUE LONDON, EC3N 3EL UNITED KINGDOM	Causes of Action Related to Insurance Policies
BRIT INSURANCE THE LEADENHALL BUILDING 122 LEADENHALL STREET LONDON, EC3V 4AB UNITED KINGDOM	Causes of Action Related to Insurance Policies
CAC SPECIALTY 444 W. LAKE ST SUITE 1700 CHICAGO, IL 60606 UNITED STATES	Causes of Action Related to Insurance Policies

Name of Counterparty	Nature
CHUBB EUROPEAN GROUP SE THE CHUBB BUILDING 100 LEADENHALL STREET LONDON, EC3A 3BP UNITED KINGDOM	Causes of Action Related to Insurance Policies
CHUBB EUROPEAN GROUP SE LA TOUR CARPE DIEM 31 PLACE DES COROLLES ESPLANADE NORD COURBEVOIE, 92400 FRANCE	Causes of Action Related to Insurance Policies
CHUBB EUROPEAN GROUP SE THE CHUBB BUILDING 40 LEADENHALL STREET LONDON, EC3A 2BJ UNITED KINGDOM	Causes of Action Related to Insurance Policies
CHUBB EUROPEAN GROUP SE DIREKTION FÜR DEUTSCHLAND BASELER STARE 10 FRANKFURT AM MAIN, 60329 GERMANY	Causes of Action Related to Insurance Policies
CNA INSURANCE COMPANY LIMITED 20 FENCHURCH STREET LONDON, EC3M 3BY UNITED KINGDOM	Causes of Action Related to Insurance Policies
CONVEX EUROPE S.A. 37 BOULEVARD JOSEPH II 2ÈME ÉTAGE LUXEMBOURG, L-1840 LUXEMBOURG	Causes of Action Related to Insurance Policies
CONVEX INSURANCE UK LIMITED 52 LIME STREET LONDON, EC3M 7AF UNITED KINGDOM	Causes of Action Related to Insurance Policies
FEDERAL INSURANCE COMPANY 15 MOUNTAIN VIEW ROAD WARREN, NJ 07061-1615 UNITED STATES	Causes of Action Related to Insurance Policies
HARTFORD FIRE INSURANCE COMPANY 1120 S TRYON ST. SUITE 1000 CHARLOTTE, NC 28202 UNITED STATES	Causes of Action Related to Insurance Policies
HARTFORD UNDERWRITING AGENCY LIMITED 6 BEVIS MARKS 8TH FLOOR LONDON, EC3A 7BA UNITED KINGDOM	Causes of Action Related to Insurance Policies
HDI GLOBAL SPECIALTY SE HDI-PLATZ 1 HANOVER, 30659 GERMANY	Causes of Action Related to Insurance Policies
HDI GLOBAL SPECIALTY SE – UK PODBIELSKISTRASSE 396 HANNOVER, 30659 GERMANY	Causes of Action Related to Insurance Policies

Name of Counterparty	Nature
INIGO LIMITED ATTENTION: HEAD OF D&O CLAIMS 7TH FLOOR ONE CREECHURCH PLACE LONDON, EC3A 5AY UNITED KINGDOM	Causes of Action Related to Insurance Policies
INTERNATIONAL GENERAL INSURANCE COMPANY (EUROPE) LIMITED DEVELOPMENT HOUSE ST. ANNE STREET FLORIANA, FRN 9010 MALTA	Causes of Action Related to Insurance Policies
IQW 1856 30 FENCHURCH STREET LONDON, EC3M 3BD UNITED KINGDOM	Causes of Action Related to Insurance Policies
LIBERTY MUTUAL INSURANCE COMPANY ATTN: S.J. WHALEN H.O. FINANCIAL CREDIT 175 BERKELEY STREET BOSTON, MA 02117 UNITED STATES	Causes of Action Related to Insurance Policies
LIBERTY MUTUAL INSURANCE EUROPE SE 5-7 RUE LÉON LAVAL LEUDELANGE, L-3372 LUXEMBOURG	Causes of Action Related to Insurance Policies
LIBERTY SEGUROS, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A. PASEO DOCE ESTRELLAS 4 MADRID, 28042 SPAIN	Causes of Action Related to Insurance Policies
LLOYD'S INSURANCE COMPANY S.A. 1 LIME STREET LONDON, EC3M 7HA UNITED KINGDOM	Causes of Action Related to Insurance Policies
LPR INSURANCE BROKERS LTD. 6TH FLOOR 40 LIME STREET LONDON, EC3M 7AW UNITED KINGDOM	Causes of Action Related to Insurance Policies
NEXUS UNDERWRITING LTD. 52-56 LEADENHALL STREET LONDON, EC3A 2EB UNITED KINGDOM	Causes of Action Related to Insurance Policies
PANTHEON SPECIALTY 6TH FLOOR 2 INDIA STREET LONDON, EC3N 2PX UNITED KINGDOM	Causes of Action Related to Insurance Policies
PROBITAS SYNDICATE 1492 88 LEADENHALL STREET LONDON, EC3A 3BJ UNITED KINGDOM	Causes of Action Related to Insurance Policies
R+V ALLGEMEINE VERSICHERUNG AG RAIFFEISENPLATZ 1 WIESBADEN, 65189 GERMANY	Causes of Action Related to Insurance Policies

Name of Counterparty	Nature
RISING EDGE LIMITED 3 LLOYD'S AVE LONDON, EC3N 3DS UNITED KINGDOM	Causes of Action Related to Insurance Policies
SOMPO INTERNATIONAL INSURANCE (EUROPE) SA 40 AVENUE MONTEREY LUXEMBOURG, L-2163 LUXEMBOURG	Causes of Action Related to Insurance Policies
STARR INTERNATIONAL (EUROPE) LIMITED 30 FENCHURCH AVENUE 4TH FLOOR LONDON, EC3M 5AD UNITED KINGDOM	Causes of Action Related to Insurance Policies
TEGRON SPECIALTY THE HALLMARK BUILDING 2ND FLOOR 52-56 LEADENHALL STREET LONDON, EC3A 2BJ UNITED KINGDOM	Causes of Action Related to Insurance Policies
THE CONTINENTAL INSURANCE COMPANY 151 N FRANKLIN STREET FLOOR 9 CHICAGO, IL 60606 UNITED STATES	Causes of Action Related to Insurance Policies
VHV ALLGEMEINE VERSICHERUNG AG VHV-PLATZ 1 HANNOVER, 30177 GERMANY	Causes of Action Related to Insurance Policies
W.R. BERKLEY SYNDICATE MANAGEMENT LIMITED 52, LIME STREET 14TH FLOOR LONDON, EC3M 7AF UNITED KINGDOM	Causes of Action Related to Insurance Policies
XL INSURANCE COMPANY SE WOLFE TONE HOUSE WOLFE TONE STREET DUBLIN 1, D01HP90 IRELAND	Causes of Action Related to Insurance Policies
ZURICH INSURANCE COMPANY LIMITED MYTHENQUAI 2 ZURICH, 8002 SWITZERLAND	Causes of Action Related to Insurance Policies
ZURICH INSURANCE COMPANY LIMITED NORFOLK HOUSE 7 NORFOLK STREET MANCHESTER, M2 1ZU UNITED KINGDOM	Causes of Action Related to Insurance Policies

Exhibit A(ii)

Causes of Action Related to Taxing Authorities

Exhibit A(ii)**Causes of Action Related to Taxing Authorities**

Name of Counterparty	Nature
ADMINISTRATION DES CONTRIBUTIONS DIRECTES ADMINISTRATION DE L'ENREGISTREMENT, DES DOMAINES ET DE LA TVA (AED) BUREAU D'IMPOSITION 3 308, ROUTE D'ESCH LUXEMBOURG, L-1471 LUXEMBOURG	Causes of Action Related to Taxing Authorities
ADMINISTRATION DES CONTRIBUTIONS DIRECTES ADMINISTRATION DES CONTRIBUTIONS DIRECTES SOCIÉTÉS 6 562, RUE DE NEUDORF BÂTIMENT IKAROS ARTEMIS LUXEMBOURG, L-2982 LUXEMBOURG	Causes of Action Related to Taxing Authorities
AGENCIA ESTATAL DE ADMINISTRACIÓN TRIBUTARIA OFICINA NACIONAL DE GESTIÓN TRIBUTARIA PASEO DE LA CASTELLANA, 147 MADRID, 28046 SPAIN	Causes of Action Related to Taxing Authorities
AGENZIA DELLE ENTRATE AGENZIA DELLE ENTRATE - UFFICIO PROVINCIALE DI VARESE VIA CARLO FRATTINI 1 VARESE, 21100 ITALY	Causes of Action Related to Taxing Authorities
AGENZIA DELLE ENTRATE CORSO GIUSEPPE MAZZINI FORLÌ, 47121 ITALY	Causes of Action Related to Taxing Authorities
AMTSGERICHT WALSRODE POSTFACH 1149 PFULLENDORF, 29651 GERMANY	Causes of Action Related to Taxing Authorities
AUTORIDADE TRIBUTÁRIA E ADUANEIRA AV. DUQUE D'AVILA, Nº 71 – 2º LISBOA, 1000-139 PORTUGAL	Causes of Action Related to Taxing Authorities
BELASTINGDIENST APELDOORN POSTBUS 4486 HEERLEN, 6401 CZ NETHERLANDS	Causes of Action Related to Taxing Authorities
BELASTINGDIENST LIMBURG - KANTOOR BUITENLAND POSTBUS 2865 HEERLEN, 6401 DJ NETHERLANDS	Causes of Action Related to Taxing Authorities
BELASTINGDIENST NOORD - KANTOOR LEEUWARDEN TESSELSCHADESTRAAT 140 LEEWARDEN, 8913 HC NETHERLANDS	Causes of Action Related to Taxing Authorities

Name of Counterparty	Nature
BUNDESAMT FUER WIRTSCHAFT UND AUSFUHRKON FRANKFURTER STRAÙE 29-35 ESCHBORN, 65760 GERMANY	Causes of Action Related to Taxing Authorities
BUNDESAMT FÜR JUSTIZ ADENAUERALLEE 99 – 103 BONN, 53113 GERMANY	Causes of Action Related to Taxing Authorities
BUNDESANZEIGER VERLAGSGES.MBH AMSTERDAMER STRAÙE 192 COLOGNE, 50735 GERMANY	Causes of Action Related to Taxing Authorities
BUNDESKASSE TRIER DASBACHSTRASSE 15 TRIER, 54292 GERMANY	Causes of Action Related to Taxing Authorities
BUNDESMINISTERIUM FÜR FINANZEN AM PROPSTHOF 78A BONN, 53121 GERMANY	Causes of Action Related to Taxing Authorities
BUNDESZENTRALAMT FÜR STEUERN DEPARTMENT ST I B 3 AN DER KÜPPE 1 BONN, 53225 GERMANY	Causes of Action Related to Taxing Authorities
BUREAU VERITAS IMMEUBLE NEWTIME 40/52 BOULEVARD DU PARC NEUILLY-SUR-SEINE PARIS, 92200 FRANCE	Causes of Action Related to Taxing Authorities
CAERPHILLY COUNTY BOROUGH COUNCIL (CCBC) PENALLTA HOUSE, TREDOMEN PARK YSTRAD MYNACH, CF82 7PG UNITED KINGDOM	Causes of Action Related to Taxing Authorities
CÂMARA MUNICIPAL DE SANTO TIRSO PRAÇA 25 DE ABRIL SANTO TIRSO, 4780-370 PORTUGAL	Causes of Action Related to Taxing Authorities
CAMBRA COMERÇ GIRONA GRAN VIA DE JAUME I, 46 GIRONA, 17001 SPAIN	Causes of Action Related to Taxing Authorities
CHAMBRE DE COMMERCE LUXEMBOURG 7 RUE ALCIDE DE GASPERI KIRCHBERG, 1615 LUXEMBOURG	Causes of Action Related to Taxing Authorities

Name of Counterparty	Nature
CONFEDERACIÓN HIDROGRÁFICA DEL NORTE C. LA REGENTA, 21-23 OVIEDO, ASTURIAS, 33006 SPAIN	Causes of Action Related to Taxing Authorities
CONSEJO SEGURIDAD NUCLEAR CALLE DE PEDRO JUSTO DORADO DELLMANS, 11 MADRID, 28040 SPAIN	Causes of Action Related to Taxing Authorities
COUNTY OF ALBEMARLE 401 MCINTIRE RD. CHARLOTTESVILLE, VA 22902 UNITED STATES	Causes of Action Related to Taxing Authorities
COUNTY OF LOUISA - TREASURER C/O HENRY B. WASH P.O. BOX 523 LOUISA, VA 23093-0523 UNITED STATES	Causes of Action Related to Taxing Authorities
DELEGACIÓN CENTRAL DE GRANDES CONTRIBUYENTES MADRID DELEGACIÓN CENTRAL DE GRANDES CONTRIBUYENTES CALLE DE GUZMÁN EL BUENO, 137 MADRID, 28003 SPAIN	Causes of Action Related to Taxing Authorities
DEPARTMENT FOR BUSINESS ENERGY 55 WHITEHALL LONDON, SW1A 2HP UNITED KINGDOM	Causes of Action Related to Taxing Authorities
DEPARTMENT FOR ENVIRONMENT, FOOD & RURAL AFFAIRS (DEFRA) 2 MARSHAM STREET SEACOLE BUILDING LONDON, SW1P 4DF UNITED KINGDOM	Causes of Action Related to Taxing Authorities
DIRECÇÃO GERAL DE ENERGIA E GEOLOGIA AV. 5 DE OUTUBRO Nº 208 LISBON, 1069-203 PORTUGAL	Causes of Action Related to Taxing Authorities
FINANZAMT (LFK) IDAR-OBERSSTEIN HAUPTSTRAßE 199 IDAR-OBERSSTEIN, 55743 GERMANY	Causes of Action Related to Taxing Authorities
FINANZAMT MONTABAUR-DIEZ KOBLENZER STRAßE 15 MONTABAUR, 56410 GERMANY	Causes of Action Related to Taxing Authorities
FOOD STANDARDS AGENCY 64 VICTORIA STREET FLOOR 11 LONDON, SW1E 6QP UNITED KINGDOM	Causes of Action Related to Taxing Authorities

Name of Counterparty	Nature
FRENCH ADMINISTRATION DIRECTION GÉNÉRALE DES FINANCES PUBLIQUES (DGFIP) 139 RUE DE BERCY PARIS, 75012 FRANCE	Causes of Action Related to Taxing Authorities
GEMEINDE BURGKIRCHEN MAX-PLANCK-PLATZ 5 BURGKIRCHEN AN DER ALZ, 84508 GERMANY	Causes of Action Related to Taxing Authorities
GEMEINDE KÖNIZ LANDORFSTRASSE 1 KÖNIZ, 3098 SWITZERLAND	Causes of Action Related to Taxing Authorities
HANDELSKAMMER BREMEN AM MARKT 13 BREMEN, 28195 GERMANY	Causes of Action Related to Taxing Authorities
HAUPTZOLLAMT BREMEN KONSUL-SMIDT-STRASSE 29 BREMEN, 28217 GERMANY	Causes of Action Related to Taxing Authorities
HAUPTZOLLAMT FRANKFURT KOPERNIKUSSTRASSE 25 FRANKFURT, 15236 GERMANY	Causes of Action Related to Taxing Authorities
HAUPTZOLLAMT KOBLENZ IM METTERNICHER FELD 44 KOBLENZ, 56072 GERMANY	Causes of Action Related to Taxing Authorities
HAUPTZOLLAMT LORRACH MOZARTSTRASSE 32 LÖRRACH, 79539 GERMANY	Causes of Action Related to Taxing Authorities
HAUPTZOLLAMT OLDENBURG FRIEDRICH-RÜDER-STRASSE 2 OLDENBURG, 26135 GERMANY	Causes of Action Related to Taxing Authorities
HAUPTZOLLAMT ROSENHEIM MÜNCHENER STR. 51 ROSENHEIM, 83022 GERMANY	Causes of Action Related to Taxing Authorities
HAUPTZOLLAMT ULM POSTFACH 2269 ULM, 89012 GERMANY	Causes of Action Related to Taxing Authorities
HM REVENUE & CUSTOMS (HMRC) BP8002 BENTON PARK VIEW NEWCASTLE UPON TYNE, NE98 1ZZ UNITED KINGDOM	Causes of Action Related to Taxing Authorities

Name of Counterparty	Nature
IHK INDUSTRIE U. HANDELSKAMMER KOBLENZ SCHLOßSTRASSE 2 KOBLENZ, 56068 GERMANY	Causes of Action Related to Taxing Authorities
IHK INDUSTRIE- UND HANDELSKAMMER MAX-JOSEPH-STRASSE 2 MÜNCHEN, 80333 GERMANY	Causes of Action Related to Taxing Authorities
INTERNAL REVENUE SERVICE DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE CENTER OGDEN, UT 84201-0012 UNITED STATES	Causes of Action Related to Taxing Authorities
KREISVERWALTUNG DES WESTERWALDKREISES POSTFACH 1207 MONTABAUER, 56401 GERMANY	Causes of Action Related to Taxing Authorities
LANDESAMT FÜR MESS- UND EICHWESEN RUDOLF-DIESEL-STRASSE 16-18 BAD KREUZNACH, 55543 GERMANY	Causes of Action Related to Taxing Authorities
LANDESFINANZKASSE DAUN BERLINER STR. 1 DAUN, 54550 GERMANY	Causes of Action Related to Taxing Authorities
LANDEJUSTIZKASSE BAMBERG HEILIGGRABSTR. 28 BAMBERG, 96052 GERMANY	Causes of Action Related to Taxing Authorities
LANDEJUSTIZKASSE MAINZ HINDENBURGST. 8 MAINZ, 55118 GERMANY	Causes of Action Related to Taxing Authorities
LANDESOBERKASSE KOBLENZ HOEVELSTRASSE 10 KOBLENZ, 56073 GERMANY	Causes of Action Related to Taxing Authorities
LANDKREIS OSTERHOLZ OSTERHOLZER STR. 23 OSTERHOLZ-SCHARMBECK, 27711 GERMANY	Causes of Action Related to Taxing Authorities
LANDRATSAMT ALTÖTTING BAHNHOFSTRASSE 38 ALTÖTTING, 84503 GERMANY	Causes of Action Related to Taxing Authorities
LANDRATSAMT ROSENHEIM PONSCHABAUSTRASSE 22 WASSERBURG, 83512 GERMANY	Causes of Action Related to Taxing Authorities

Name of Counterparty	Nature
LEEDS CITY COUNCIL CIVIC HALL CALVERLEY STREET LEEDS WEST YORKSHIRE, LS1 1UR UNITED KINGDOM	Causes of Action Related to Taxing Authorities
ORANGE COUNTY TREASURER P.O. BOX 469 ORANGE, VA 22960 UNITED STATES	Causes of Action Related to Taxing Authorities
REVENUE COMMISSIONERS COLLECTOR GENERAL'S DIVISION SARSFIELD HOUSE FRANCIS STREET LIMERICK, V94 R972 IRELAND	Causes of Action Related to Taxing Authorities
SERVICE DES IMPÔTS DES ENTREPRISES (SIE) SIE 36 RUE ALBERT DE MUN CEDEX PONTIVY, 56036 FRANCE	Causes of Action Related to Taxing Authorities
SERVICE DES IMPÔTS DES ENTREPRISES (SIE) CENTRE DES FINANCES PUBLIQUES 5 RUE DE LONDRES CEDEX PARIS, 75315 FRANCE	Causes of Action Related to Taxing Authorities
SERVICIOS TRIBUTARIOS DEL PRINCIPADO DE ASTURIAS C/O HERMANOS MENENDEZ PIDAL Nº 7-9 OVIEDO, 33005 SPAIN	Causes of Action Related to Taxing Authorities
SHERIFF OF RALEIGH COUNTY 215 MAIN STREET BECKLEY, WV 25801 UNITED STATES	Causes of Action Related to Taxing Authorities
ST HELENS METROPOLITAN BOR.COUNCIL TOWN HALL, CUSTOMER SERVICE HUB VICTORIA SQUARE ST. HELENS, WA10 1HP UNITED KINGDOM	Causes of Action Related to Taxing Authorities
STAATLICHES GEWERBEAUF SICHTSAMT CUXHAVEN ELFENWEG 15 CUXHAVEN, 27474 GERMANY	Causes of Action Related to Taxing Authorities
STADT KOBLENZ WILLI-HÖRTER-PLATZ 1, 07 KOBLENZ, 56068 GERMANY	Causes of Action Related to Taxing Authorities

Name of Counterparty	Nature
STADTVERW.KREISSTADT BEESKOW BERLINER STR. 30 BEESKOW, 15848 GERMANY	Causes of Action Related to Taxing Authorities
STATE OF NEW JERSEY P. O. BOX 929 TRENTON, NJ 08646 UNITED STATES	Causes of Action Related to Taxing Authorities
TOWN OF RURAL RETREAT 307 S. MAIN ST RURAL RETREAT, VA 24368 UNITED STATES	Causes of Action Related to Taxing Authorities
TREASURER OF VIRGINIA 900 EAST BROAD STREET RICHMOND, VA 23219 UNITED STATES	Causes of Action Related to Taxing Authorities
TREASURER OF WYTHE COUNTY 225 SOUTH FOURTH ST. ROOM 104 WYTHEVILLE, VA 24382-2547 UNITED STATES	Causes of Action Related to Taxing Authorities
TREASURER, CITY OF VIRGINIA BEACH 2401 COURTHOUSE DRIVE VIRGINIA BEACH, VA 23456-9018 UNITED STATES	Causes of Action Related to Taxing Authorities
TRESORERIE DE PONTIVY CENTRE DES FINANCES PUBLIQUES 36 RUE ALBERT-DE MUN PONTIVY CEDEX, 56306 FRANCE	Causes of Action Related to Taxing Authorities
U.S. CUSTOMS AND BORDER PROTECTION 1300 PENNSYLVANIA AVE. NW WASHINGTON, DC 20229 UNITED STATES	Causes of Action Related to Taxing Authorities
UNITED STATES TREASURY P O BOX 1303 CHARLOTTE, NC 28201-1303 UNITED STATES	Causes of Action Related to Taxing Authorities
URSSAF URSSAF ALSACE – FOREIGN COMPANIES SERVICE 16 RUE CONTADES CEDEX STRATSBURG, 67945 FRANCE	Causes of Action Related to Taxing Authorities
VERBANDSGEMEINDEVERWALTUNG KONRAD-ADENAUER-PLATZ 8 MONTABAUER, 56410 GERMANY	Causes of Action Related to Taxing Authorities

Name of Counterparty	Nature
VIRGINIA DEPARTMENT OF TAXATION 3600 WEST BROAD STREET RICHMOND, VA 23230 UNITED STATES	Causes of Action Related to Taxing Authorities
WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION 601 57TH ST SE CHARLESTON, WV 25304 UNITED STATES	Causes of Action Related to Taxing Authorities
WEST VIRGINIA STATE TAX DEPARTMENT PO BOX 1202 CHARLESTON, WV 25324-1202 UNITED STATES	Causes of Action Related to Taxing Authorities
WESTERWALDKREIS PETER-ALTMEIER-PLATZ 1 MONTABAUER, 56410 GERMANY	Causes of Action Related to Taxing Authorities
WYTHE COUNTY 340 S. 6TH STREET WYTHEVILLE, VA 24382 UNITED STATES	Causes of Action Related to Taxing Authorities

Exhibit A(iii)

Causes of Action Related to Claims, Defenses, Cross-Claims, and Counter-Claims Related to Litigation and Possible Litigation

Exhibit A(iii)

Causes of Action Related to Claims, Defenses, Cross-Claims, and Counter-Claims Related to Litigation and Possible Litigation

Debtor	Litigation Party	Caption of Suit and Case Number (if applicable)	Jurisdiction
Klöckner Pentaplast GmbH	German Federal Office of Economic Affairs & Export (BAFA)	Klöckner Pentaplast GmbH / Federal Republic of Germany, represented by the Federal Office for Economic Affairs and Export Control Case No. Az. 6 A 1989/22.Z	Court Of Appeals Frankfurt Germany
Klöckner Pentaplast GmbH	Koblenz Main Customs Office	Notification of relief in accordance with Section 9b StromStG for 2024 Case No. V 4260 B - 2025.00481330 - B 2101	Hauptzollamt Koblenz

Exhibit B

Assumed Executory Contracts and Unexpired Leases List

Exhibit B

Assumed Executory Contracts and Unexpired Leases List

On the Effective Date, all Executory Contracts and Unexpired Leases that are not otherwise rejected shall be deemed assumed by the applicable Reorganized Debtor with the consent of the Required Consenting Senior Creditors, without the need for any further notice to or action, order, or approval of the Bankruptcy Court, as of the Effective Date under sections 365 and 1123 of the Bankruptcy Code, unless such Executory Contract or Unexpired Lease was (a) previously assumed, amended and assumed, assumed and assigned, or rejected by the applicable Debtors; (b) previously expired or terminated pursuant to its own terms; or (c) is the subject of a motion to reject such executory contract or unexpired lease that is pending on the Effective Date; or (d) is identified on the Rejected Executory Contracts and Unexpired Leases List; *provided* that neither the Restructuring Transactions or any actions contemplated by the Plan shall be deemed a “change of control” or other acceleration event for purposes of any Executory Contract or Unexpired Lease of the Debtors.

Entry of the Confirmation Order shall constitute an order of the Bankruptcy Court approving the assumptions, assumptions and assignments, or rejections of the Executory Contracts or Unexpired Leases as set forth in the Plan, the Assumed Executory Contracts and Unexpired Leases List, or the Rejected Executory Contracts and Unexpired Leases List, as applicable, pursuant to sections 365(a) and 1123 of the Bankruptcy Code. Except as otherwise specifically set forth herein, assumptions or rejections of Executory Contracts and Unexpired Leases pursuant to the Plan are effective as of the Effective Date. Each Executory Contract or Unexpired Lease assumed pursuant to the Plan or by Bankruptcy Court order but not assigned to a third party before the Effective Date shall revert in and be fully enforceable by the applicable contracting Reorganized Debtor in accordance with its terms, except as such terms may have been modified by the provisions of the Plan or any order of the Bankruptcy Court authorizing and providing for its assumption. Any motions to assume Executory Contracts or Unexpired Leases pending on the Effective Date shall be subject to approval by a Final Order on or after the Effective Date but may be withdrawn, settled, or otherwise prosecuted by the Reorganized Debtors.

Exhibit C

Rejected Executory Contracts and Unexpired Leases List

Exhibit C

Rejected Executory Contracts and Unexpired Leases List

None.

Exhibit D

Exit Financing Term Sheet

[TO BE FILED AT A LATER DATE]

Exhibit E

Governance Term Sheet

[TO BE FILED AT A LATER DATE]

Exhibit F

Restructuring Steps Plan

[TO BE FILED AT A LATER DATE]