



GRANTED WITH MODIFICATIONS

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

KARSAN VALUE FUNDS AND)
 ROBERT GRUTERS, For Themselves)
 And On Behalf of All Others Similarly)
 Situated,)
)
 Plaintiffs,)
 v.)
)
 KOSTECKI BROKERAGE PTY LTD,)
 MARIA ANASTAZIA KOSTECKI, and)
 STEVEN MICHAEL KOSTECKI,)
)
 Defendants.)

C.A. No. 2021-0899-LWW

[PROPOSED] ORDER FOR DISTRIBUTION OF CLASS SETTLEMENT FUND

The Court having considered all materials and arguments submitted in support of Plaintiffs’ Unopposed Motion for Distribution of Class Settlement Fund, including the accompanying affidavit of Nicolas Schmidt in support of that motion (the “Schmidt Affidavit”),

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

- 1. For purposes of this Order, the terms used herein shall have the same meanings as set forth in the Stipulation and Agreement of Compromise and Settlement Between Plaintiffs and Defendants dated December 11, 2023 (the “Stipulation”).

2. This Court has jurisdiction over the subject matter of the Action and over all parties to the Action, including all Settlement Class Members.

3. The Court authorizes payment of \$62,086.33 from the Settlement Fund to the Settlement Administrator for the fees and expenses incurred and estimated to be incurred in connection with the settlement administration process, as described in the Schmidt Declaration.

4. The distribution plan for the Net Settlement Fund as set forth in the Schmidt Declaration and accompanying exhibits is approved. The balance of the Net Settlement Fund, that is, the Settlement Fund less: i) any Taxes and Tax Expenses; (ii) any Notice and Administration Costs; (iii) any Fee and Expense Award awarded by the Court; and (iv) any other costs or fees approved by the Court will be distributed in accordance with the Plan of Allocation.

5. Under the Plan of Allocation, the Net Settlement Fund will be distributed on a pro rata basis to “Eligible Class Members.” “Eligible Class Members” will consist of all Class members who were record and/or beneficial owners of Alloy Steel common stock, as of September 17, 2021 (the date of the consummation of the Merger), who received Merger consideration, together with their respective successors and assigns. “Eligible Shares” will be the number of shares of Alloy Steel common stock held by Eligible Class Members at the Closing

and for which Eligible Class Members received or were entitled to receive in the Merger Consideration.

6. Each Eligible Class Member will receive a *pro rata* payment from the Net Settlement Fund equal to the product of (i) the number of Eligible Shares held by the Eligible Class Member and (ii) the “Per-Share Recovery” for the Settlement, which will be determined by dividing the total amount of the Net Settlement Fund by the total number of Eligible Shares.

7. Payments from the Net Settlement Fund to Eligible Class Members will be made in the same manner in which Eligible Class Members received the Merger Consideration.

Dated: _____, 2025

Vice Chancellor Lori W. Will

This document constitutes a ruling of the court and should be treated as such.

Court: DE Court of Chancery Civil Action

Judge: Lori W. Will

File & Serve

Transaction ID: 75383979

Current Date: Jan 13, 2025

Case Number: 2021-0899-LWW

Case Name: CLOSED 11.07.2024 -- CONF ORDER - Karsan Value Funds v. Kostecki Brokerage Pty Ltd.

Court Authorizer

Comments:

Money remaining in the Net Settlement Fund post-distribution that cannot be further distributed to Eligible Class Members should be sent to the Delaware Combined Campaign for Justice.

/s/ Judge Lori W. Will