

Proposed Class Definition – MotoNovo

All natural persons alive (and representatives of the estates of deceased people) who in the period from 1 October 2015 to 27 January 2021 entered into one or more point-of-sale finance agreements with one or more of the Defendants (and/or any other company which was, from time to time, within the same corporate group as the Defendants) for the acquisition in the United Kingdom of one or more used motor vehicles for personal use, excluding:

- (a) officers, directors or employees of any of the Defendants or any of the defendants in other Relevant Proceedings and/or any other company which was, from time to time, within the same corporate group as any of those defendants;
- (b) the director(s) of, all members of the legal team(s) of, the professional advisor(s) to, and/or the expert(s) instructed by the Class Representative or any of the other parties to any of the Relevant Proceedings;
- (c) all members of the Tribunal panel assigned to any of the Relevant Proceedings; and
- (d) any judge hearing any appeal in any of the Relevant Proceedings.

“**Defendants**” means MotoNovo Finance Limited, FirstRand Bank Limited (London Branch) and Aldermore Group PLC.

“**Relevant Proceedings**” means these Collective Proceedings against the Defendants or the separate collective proceedings brought by the Class Representative against Black Horse Limited, Black Horse Group Limited, Lloyds Bank Asset Finance Limited, Lloyds Bank plc and Lloyds Banking Group plc and Santander Consumer (UK) plc, Santander UK plc, Santander UK Group Holdings plc and Banco Santander, S.A., London Branch.