

Executive Summary of Proposed Volkswagen 3.0-Liter Diesel Emissions Class Settlement Program

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Introduction

Volkswagen and Audi (collectively “Volkswagen”) along with Porsche (together with Volkswagen, the “Defendants”) have reached three Settlements related to allegations that they installed defeat device software to bypass emissions standards in the 3.0-liter TDI diesel vehicles listed below:

- A Class Action Settlement with 3.0-liter vehicle owners/lessees, including certain former owners/lessees and vehicle dealers (“3.0-liter Class Action Settlement”);
- A Consent Decree with the United States Department of Justice (“DOJ”) on behalf of the Environmental Protection Agency (“EPA”) and the State of California by and through the California Air Resources Board (“CARB”) and the California Attorney General (“CA AG”) (“US/CA Settlement”); and
- A Consent Order with the Federal Trade Commission (“FTC”) (“FTC Settlement”).

As summarized below, the 3.0-liter Class Action Settlement, if approved by the Court, provides substantial compensation to ALL 3.0-liter Class Members. Not all Class Members have the same options, because there are two “Generations” of 3.0-liter vehicles with different engine designs. At present, Volkswagen believes that there are no practical engineering solutions that would, without negative impact to vehicle functions and unacceptable delay, bring Generation One vehicles into compliance with the emissions standards to which they were originally certified. By contrast, Defendants expect that Generation Two vehicles can be repaired to compliance with the original emissions standards (the “Certified Exhaust Emissions Standards”) without materially reducing vehicle performance, and the DOJ/EPA/CARB have determined that Defendants should be given this opportunity. The Class Settlement provides specific procedures, deadlines, and consequences for delay or rejection of a proposed Emissions Compliant Repair of Generation Two vehicles.

As a result, for Generation One vehicles, in addition to any Reduced Emissions Modification that becomes available, a Buyback, Trade-In, and Lease Termination Option will become available immediately upon Final Approval. The Buyback, Trade-In, and Lease Termination Options will become available to those with Generation Two vehicles (or some subset of those vehicles) only if an Emissions Compliant Repair does not timely become available. However, Class Members with Generation Two vehicles will not have to wait until an Emissions Compliant Repair is available to receive compensation: they can receive an upfront payment (Repair Participation Payment) of up to 50% of their expected cash compensation upon Final Approval.

Regardless of Generation, all 3.0-liter Eligible Owners and Eligible Lessees who do not opt out of the Class will be entitled to substantial cash compensation and many additional benefits described below, and in detail on the Settlement Website, www.VWCourtSettlement.com.

Eligible Former Owners and Eligible Former Lessees who do not opt out of the Class will also be entitled to substantial cash compensation. Because a car may have more than one owner during the relevant period, for those cars that changed hands, the Settlement equitably divides Owner Restitution 50/50 between the owner as of September 18, 2015 and/or November 2, 2015 when the emissions accusations became public (“Eligible Former Owner”) and the current owner (“Eligible Owner”). Similarly, if an “Eligible Former Lessee” leased a car as of September 18, 2015 and/or November 2, 2015 when the emissions accusations became public and, after the lease expired, the car was purchased by a different person, the Settlement divides the payment between the Eligible Former Lessee and the Eligible Owner. For more information on the benefits available to Eligible Former Owners and Eligible Former Lessees, visit www.VWCourtSettlement.com.

This is a claims-made settlement. The amount Volkswagen will pay depends on how many Class Members timely file valid and complete claims. If the Emissions Compliant Repair is timely available for the Generation Two vehicles and 100% of Class Members with Generation One and Generation Two vehicles participate in the Settlement, Volkswagen has agreed to pay up to approximately \$1.2 billion in combined

compensation. If the Emissions Compliant Repair is *not* timely available for the Generation Two vehicles and 100% of Class Members with Generation One and Generation Two vehicles participate in the Settlement, Volkswagen has agreed to pay up to approximately \$4.04 billion in combined compensation. In addition, under the related US/CA Settlement, Volkswagen will pay an additional \$225 million to mitigate the environmental effects of excess NOx emissions and, separately, Volkswagen has committed to pay \$25 million to CARB to support the use of zero emissions vehicles in California. The ultimate goal of these Agreements is to compensate all owners or lessees of 3.0-liter Eligible Vehicles for any harm they suffered as a result of the emissions issues, and to ensure that any excess NOx emissions from Defendants' 3.0-liter TDI vehicles are mitigated.

The 3.0-liter Vehicles

The following 3.0-liter TDI diesel engine vehicles are included in the Settlement. The vehicles are divided into two generations because they use two different versions of Defendants' 6-cylinder 3.0-liter engines: Generation One (Volkswagen and Audi Model Years 2009-2012) and Generation Two (Volkswagen, Audi, and Porsche Model Years 2013-2016):

GENERATION ONE	
MODEL	MODEL YEARS
Volkswagen Touareg	2009-2012
Audi Q7	2009-2012
GENERATION TWO	
MODEL	MODEL YEARS
Volkswagen Touareg	2013-2016
Audi Q7	2013-2015
Audi A6	2014-2016
Audi A7	2014-2016
Audi A8, A8L	2014-2016
Audi Q5	2014-2016
Porsche Cayenne	2013-2016

Nearly everyone who owned or leased any of these vehicles on September 18, 2015 (the date the emissions allegations first became public) or November 2, 2015 (the date the allegations specific to the 3.0-liter vehicles became public) and anyone who currently owns or leases one is a member of the 3.0-liter Class Action Settlement Class, unless your vehicle does not meet the requirements to be considered an "Eligible Vehicle" under the Settlement. If, however, you sell your car after January 31, 2017 (the date the 3.0-liter Class Action Settlement and FTC Settlement were filed), you will not receive any benefits.

Benefits to Class Members

As the Court presiding over this litigation has stated, the options and benefits available to Class Members are based on whether their vehicles can be brought into compliance without reduced performance. Generation One vehicles **cannot** practically and timely be made compliant with their originally certified emissions standards: they are like the 2.0-liter vehicles that are the subject of the earlier approved class action settlement in this respect. Because of this, Generation One options and benefits are structured like that 2.0-liter settlement. In contrast, federal and state regulators have decided to give Defendants an opportunity to make Generation Two vehicles compliant with Certified Exhaust Emissions Standards, and it is environmentally responsible to do so. The Settlements provide a process, standards, and a finite period for this effort, while also providing substantial compensation for Generation Two owners and lessees, and additional compensation and options if Defendants cannot bring the vehicles into compliance on time.

Benefits for Generation One Vehicles

Because Generation One vehicles cannot be repaired to be compliant with originally certified emissions standards, the options and benefits available to Owners and Lessees of Generation One Eligible Vehicles include three choices:

- (1) **Buyback or Lease Termination:** Owners can have Volkswagen buy back their vehicles and pay substantial compensation, and current lessees can have Volkswagen terminate their leases and pay substantial compensation.
- (2) **Trade-In:** Owners could instead choose to trade in their eligible vehicle at a participating Volkswagen or Audi dealership and receive the full amount they would receive in a Buyback as a Trade-In Credit towards another vehicle.
- (3) **Emissions Modification:** If the EPA and CARB approve an emissions modification, owners and current lessees who keep their vehicles would receive a Reduced Emissions Modification to significantly reduce their vehicles' emissions, and substantial compensation. The Reduced Emissions Modification (if made available for any 3.0-liter vehicles) is expected to include changes to the vehicles' operating software and, for some vehicles, upgrades or additions to components of the emissions control hardware.

Volkswagen has agreed to begin the Buyback and Trade-In programs for Generation One vehicles immediately after the Court grants final approval and enters the US/CA Settlement. Class Members will not have to wait until any appeals have been resolved. It is anticipated that Class Members will be allowed to drive their vehicles legally while they await their Buyback, Trade-In, or Reduced Emissions Modification.

Benefits for Generation Two Vehicles

Emissions Compliant Repairs

It is expected that the newer, Generation Two vehicles **can** be repaired to **comply** with their Certified Exhaust Emissions Standards without materially reduced performance of the vehicle. This repair is called an "Emissions Compliant Repair." The Emissions Compliant Repair will include changes to the vehicles' operating software and, for some of the Generation Two vehicles, upgrades or additions to components of the emissions control hardware. If the regulators determine that Defendants can complete an Emissions Compliant Repair for Generation Two vehicles, Volkswagen and/or Porsche, as applicable, will be required to fix the Generation Two vehicles free of charge and provide other benefits to Class Members, as described below. The 3.0-liter Class Action Settlement provides specific deadlines for this approval process and sets the substantial compensation to be paid to Owners and Lessees of Generation Two vehicles.

Repair Participation Payment and Class Bridge Warranty

While the EPA and CARB are testing Defendants' proposed repairs and determining whether to approve them, **eligible owners and lessees of Generation Two vehicles may receive, after the Court grants final approval of the Settlement, half (50%) of the total compensation they will be entitled to if an Emissions Compliant Repair timely becomes available. This advance payment is called a Repair Participation Payment.** The Repair Participation Payment will count towards the total amount that Volkswagen ultimately owes the Class Member.

Generation Two Class Members whose New Vehicle and/or Powertrain Limited Warranty expires before their Emissions Compliant Repair is approved or denied and whose vehicles are not covered by another warranty and/or service contract (provided through Volkswagen, Audi, Porsche, or any third-party) will be provided Class Bridge Warranty coverage to cover repairs of the type and for the specific time period described in the 3.0-liter Class Action Agreement.

If an Emissions Compliant Repair is not approved by the deadlines described in the Emissions Compliant Repair Decision Timetable and Procedures section below, Generation Two Class Members would then have these three choices:

- (1) **Buyback or Lease Termination:** Owners can have Volkswagen buy back their vehicles and pay substantial compensation, and current lessees can have Volkswagen terminate their leases and pay substantial compensation.
- (2) **Trade-In:** Owners could instead choose to trade in their vehicles at a participating Volkswagen, Audi, or Porsche dealership and receive the full amount they would receive in a Buyback as a Trade-In Credit towards another vehicle.
- (3) **Emissions Modification:** If the EPA and CARB approve an emissions modification to a lesser standard or after the deadlines set forth for an Emissions Compliant Repair, owners and current lessees could receive an Approved Emissions Modification that would reduce their vehicles' emissions, as well as substantial compensation.

Additional Benefits for Generation One and Two Vehicles

Class Members also will be offered the following benefits and protections:

- For current owners and lessees of Generation One vehicles, or owners and lessees of Generation Two vehicles for which an Emissions Complaint Repair is not available on time, one free AdBlue refill and oil change for their Eligible Vehicle while waiting for an emissions modification, Buyback, Trade-In, or Lease Termination;
- For Class Members who get a Buyback, termination of extended warranties and service plans and refunds of unused portions of them, in certain circumstances;
- In certain circumstances, loaner cars while their vehicles are being modified/repaired;
- For Class Members who get a Buyback or Trade-In, forgiveness of auto loan balances to the extent they exceed their Buyback amount, up to a maximum of 30% the Buyback Amount; and
- A second opportunity to withdraw from the Class later if no Approved Emissions Modification is approved for their vehicle (if they prefer this option to taking a Buyback or a Trade-In).¹

How to Obtain Settlement Benefits

The Settlement website www.VWCourtSettlement.com will inform Class Members on how to enter their Vehicle Identification Number ("VIN") to see an estimated Vehicle Value and Owner (or Lessee) Restitution for their vehicle. A court hearing for final approval will be set for early May 2017. Fifteen business days after final approval, if it is granted, Class Members may initiate their claims by providing documents and information through the claims portal accessible from the Settlement website.

To claim Settlement benefits, Eligible Former Owners who owned their eligible vehicle on September 18, 2015 and/or November 2, 2015 when the emissions accusations became public and who sold that vehicle on or before January 31, 2017, must submit to Volkswagen an identification form online, by mail or by fax by

¹ Generation Two Class Members would need to give back their Repair Participation Payment, if they took one, to exercise this "back-end opt out."

May 1, 2017. Those Eligible Former Owners as well as Eligible Former Lessees must file a complete claim within 60 days of the court's final approval of the 3.0-liter Class Action Settlement, which could be given in May 2017.

All other Generation One Class Members must submit a claim by June 1, 2019. All other Generation Two Class Members must submit a claim by December 31, 2019.

Environmental Relief

On top of the compensation described above, under settlements with the EPA and CARB, Volkswagen will pay \$225 million into a Trust designed to support environmental programs throughout the country that will reduce NOx in the atmosphere by an amount intended to mitigate fully past and future excess emissions from these 3.0-liter vehicles. Volkswagen must also spend \$25 million to promote Zero Emission Vehicles ("ZEVs"), over and above any amount Volkswagen previously planned to spend on such technology. EPA and CARB will oversee and monitor, and the Court will enforce, Volkswagen's compliance with the Trust payment and the ZEV investment.

Settlement Payments to Generation One Owners

The tables below show the range of possible payment amounts to Generation One owners under the 3.0-liter Class Action Settlement. The amount you will be offered depends on which option is involved (Buyback/Trade-In or Reduced Emissions Modification) and your vehicle's model year, model, trim level, and factory options. The Reduced Emissions Modification option will only be available if the EPA and CARB approve a modification.

If you choose the Buyback Option, you will receive your vehicle's September 2015 Clean Trade Vehicle Value, plus an additional restitution amount, for a total payment ranging from \$24,755 to \$57,157. The Buyback payment compensates you for the value of your vehicle frozen in September 2015 using an industry standard for valuing vehicles (the NADA Used Car Guide), and includes an additional restitution amount of more than \$7,500 (before any adjustment for your vehicle's current mileage).

If you choose the Trade-In Option, you will receive the amount you would have received in a Buyback as a Trade-In Credit toward another vehicle.

If you choose the Reduced Emissions Modification option instead, you will receive a free modification plus the same additional restitution amount you would receive for a Buyback. Payments for emissions modifications to Generation One vehicles range from \$7,755 to \$13,880.

Your payment amount may be adjusted up or down if your vehicle has higher or lower than standard mileage (15,000 miles per year) when you bring it into a dealership to participate in the Settlement program. The tables below assume that your vehicle is not subject to a mileage adjustment and that you owned it on September 18, 2015 when the emissions accusations became public and still own it. If you no longer have your vehicle, or if you purchased it used after September 18, 2015, then you will be offered a lesser amount.

Payment Amounts for All Generation One Owners

Find your vehicle's Model Year, Model, and Trim below:	Option 1: Buyback Sell your vehicle back to Volkswagen plus receive a payment for a combined total of: <i>or</i> Trade-In Receive an equivalent Trade-In Credit of:	Option 2: Reduced Emissions Modification Keep your vehicle, receive a free modification to reduce emissions plus a payment of:
Model	Option 1 Amount	Option 2 Amount
2009 Audi Q7 TDI Premium Plus S-Line	\$32,680 - \$35,537	\$7,905 - \$10,512
2009 Audi Q7 TDI Prestige S-Line	\$33,730 - \$36,918	\$7,955 - \$10,893
2009 Audi Q7 TDI Premium	\$30,788 - \$32,234	\$8,628 - \$10,034
2009 Audi Q7 TDI Premium Plus	\$30,405 - \$33,645	\$7,830 - \$10,470
2009 Audi Q7 TDI Prestige	\$31,480 - \$34,609	\$7,880 - \$10,409
2009 Volkswagen Touareg TDI	\$24,755 - \$29,490	\$7,755 - \$10,000
2010 Audi Q7 TDI Prestige S-Line	\$38,305 - \$44,764	\$8,130 - \$11,789
2010 Audi Q7 TDI Premium	\$32,855 - \$35,574	\$7,930 - \$10,399
2010 Audi Q7 TDI Premium Plus	\$34,555 - \$38,293	\$7,980 - \$11,043
2010 Audi Q7 TDI Premium Plus S-Line	\$37,055 - \$40,341	\$8,105 - \$11,066
2010 Audi Q7 TDI Prestige	\$36,030 - \$42,337	\$8,030 - \$11,600
2010 Volkswagen Touareg TDI	\$26,405 - \$31,968	\$8,280 - \$10,993
2011 Audi Q7 TDI Prestige S-Line	\$41,830 - \$49,144	\$8,005 - \$12,033
2011 Audi Q7 TDI Premium	\$37,462 - \$40,764	\$7,880 - \$10,743
2011 Audi Q7 TDI Premium Plus	\$37,555 - \$41,813	\$7,905 - \$11,313
2011 Audi Q7 TDI Prestige	\$39,755 - \$47,057	\$7,955 - \$11,907
2011 Volkswagen Touareg TDI Executive	\$39,155 - \$42,940	\$8,130 - \$11,615
2011 Volkswagen Touareg TDI Lux	\$35,755 - \$39,200	\$8,005 - \$11,150
2011 Volkswagen Touareg TDI Sport	\$33,880 - \$37,138	\$7,955 - \$10,913
2012 Audi Q7 TDI Prestige S-Line	\$48,755 - \$57,157	\$9,005 - \$13,807
2012 Audi Q7 TDI Premium	\$42,730 - \$46,974	\$8,880 - \$12,386
2012 Audi Q7 TDI Premium Plus	\$43,630 - \$48,550	\$8,855 - \$12,875
2012 Audi Q7 TDI Prestige	\$46,030 - \$54,930	\$8,905 - \$13,880
2012 Volkswagen Touareg TDI Executive	\$43,655 - \$48,000	\$8,255 - \$12,200
2012 Volkswagen Touareg TDI Lux	\$39,655 - \$43,600	\$8,130 - \$11,675
2012 Volkswagen Touareg TDI Sport	\$37,055 - \$40,740	\$8,055 - \$11,340
2012 Volkswagen Touareg TDI Sport Navigation	\$37,780 - \$41,538	\$8,080 - \$11,438

Settlement Payments to Generation One Lessees

The tables below show the range of possible payment amounts to Generation One lessees under the 3.0-liter Class Action Settlement. The amount you will be offered will be the same whether you choose a Lease Termination, a Reduced Emissions Modification, or no longer have an active lease, and will depend on your vehicle's model year, model, trim level, and factory options. The Reduced Emissions Modification option will only be available if the EPA and CARB approve a modification.

These tables assume that you leased an eligible vehicle with VW Credit, Inc. or Audi Financial Services on September 18, 2015 and/or November 2, 2015 when the emissions accusations became public. If you purchased your leased vehicle before January 31, 2017 and still own it, then you will be treated as an owner

for purposes of the Settlement and should use the tables in the owner section above to find your range of possible payments. Payments to Generation One lessees range from \$5,001 to \$6,615.

Payment Amounts for All Generation One Lessees

Find your vehicle's Model Year, Model, and Trim below:	Lease Termination or Reduced Emissions Modification Terminate your lease, or keep your vehicle and get a free modification to reduce emissions, and receive a payment of:
Model	Lessee Restitution
2012 Audi Q7 TDI Prestige S-Line	\$6,615 - \$6,615
2012 Audi Q7 TDI Premium Plus	\$5,845 - \$6,125
2012 Audi Q7 TDI Prestige	\$5,753 - \$5,753
2012 Volkswagen Touareg TDI Executive	\$5,336 - \$5,757
2012 Volkswagen Touareg TDI Lux	\$5,570 - \$5,570
2012 Volkswagen Touareg TDI Sport	\$5,001 - \$5,144

Emissions Compliant Repair Decision Timetable And Procedures For Generation Two Vehicles

The Generation Two Vehicles are divided into the following sub-generations:

Model Year	EPA Test Group(s)	Vehicle Make and Model(s)	Sub-Generation
2009	9ADXT03.03LD	VW Touareg, Audi Q7	1.1
2010	AADXT03.03LD	VW Touareg, Audi Q7	1.1
2011	BADXT03.02UG BADXT03.03UG	VW Touareg Audi Q7	1.2
2012	CADXT03.02UG CADXT03.03UG	VW Touareg Audi Q7	1.2
2013	DADXT03.02UG DADXT03.03UG DPRXT03.0CDD	VW Touareg Audi Q7 Porsche Cayenne Diesel	2.1 SUV
2014	EADXT03.02UG EADXT03.03UG EPRXT03.0CDD	VW Touareg Audi Q7 Porsche Cayenne Diesel	2.1 SUV
2014	EADXJ03.04UG	Audi: A6 quattro, A7 quattro, A8, A8L, Q5	2 PC
2015	FVGAT03.0NU3	Audi: Q7, A6 quattro, A7 quattro, A8, A8L, Q5	2.1 SUV
2015	FVGAT03.0NU2 FPRXT03.0CDD	VW Touareg Porsche Cayenne Diesel	2.2 SUV
2015	FVGAJ03.0NU4	Audi: A6 quattro, A7 quattro, A8, A8L, Q5	2 PC
2016	GVGAT03.0NU2 GPRXT03.0CDD	VW Touareg Porsche Cayenne Diesel	2.2 SUV
2016	GVGAJ03.0NU4	Audi: A6 quattro, A7 quattro, A8, A8L, Q5	2 PC

EPA and CARB will be making approval decisions for the Emissions Compliant Repair for vehicles with Generation Two engines on a subgroup-by-subgroup basis. The 3.0-liter Class Action Agreement sets a timetable for the “Decision Date” for each group as follows:

Sub-Generation	Decision Date for the Emissions Compliant Repair
2.1 SUV	November 8, 2017
2.2 SUV	October 23, 2017
2 PC	December 20, 2017

If an Emissions Compliant Repair for your vehicle is available on time, you will receive the repair and an additional Repair Payment in an amount that depends on your vehicle’s model year, model, and factory options, shown in the first table below. Repair Payments to owners of Generation Two vehicles range from \$7,039 to \$16,114. Lessees and former lessees of Generation Two vehicles will receive a Repair Payment of \$2,000.

Buyback Trigger and Extension Payments

If the EPA and CARB have not made a final decision for a subgroup of vehicles by the Decision Date in the table above, Class Counsel can ask the Court to require Volkswagen to provide a Buyback for that subgroup. The Court can extend the decision date if there is good cause to do so. If the Court does not extend the decision date, Volkswagen nevertheless can choose to extend the date up to 90 days total in exchange for an Extension Payment of \$500 per vehicle per 30-day extension. The Extension Payments will be paid to Class Members when they receive their final Repair Payment or Restitution Payment.

Performance Representations and Protections

Defendants represent that the Emissions Compliant Repair shall not result in “Reduced Performance.” In the event that the Emissions Compliant Repair causes Reduced Performance of the Eligible Vehicle, Volkswagen shall make an additional payment of \$500 for each affected Eligible Vehicle. Reduced Performance means a change in any of the following performance attributes: (1) a reduction in fuel economy of more than 3 MPG; (2) a decrease of greater than 5% in peak horsepower; or (3) decrease of greater than 5% peak torque. These will be measured by Volkswagen pursuant to industry standards in its submission to EPA and CARB. If the regulators approve the Emissions Compliant Repair, Defendants shall disclose the extent of any Reduced Performance in a Notice to affected Class Members. If the Emission Compliant Repair causes substantial, material adverse degradation above and beyond the Reduced Performance levels specified above, Plaintiffs reserve their right to seek, and Defendants reserve their right to oppose, additional remedies from the Court.

If an Emissions Compliant Repair for your vehicle is *not* available on time, you will have a choice between a Buyback, a Trade-In, and, if the EPA and CARB approve it, a Reduced Emissions Modification (or an Emissions Compliant Repair approved after the deadlines set forth in the Agreement), plus compensation as calculated below.

If you choose the Buyback Option, you will receive your vehicle’s September 2015 Clean Trade Vehicle Value, plus an additional restitution amount, for a total payment ranging from \$43,153 to \$144,771 as shown in the second table below. The Buyback payment compensates you for the value of your vehicle frozen in September 2015 using an industry standard for valuing vehicles (the NADA Used Car Guide), and includes an additional restitution amount of more than \$11,000 (before any adjustment for your vehicle’s current mileage).

If you choose a Trade-In, you will receive the amount you would have received in a Buyback as a Trade-In Credit toward a new vehicle

If you instead choose the Approved Emissions Modification option, you will receive a free modification plus the same additional restitution amount you would receive for a Buyback. Payments for emissions modifications to Generation Two vehicles range from \$11,353 to \$45,911 as shown in the second table below.

Your payment amount may be adjusted up or down if your vehicle has higher or lower than standard mileage (15,000 miles per year) when you bring it into a dealership to participate in the Settlement program. The tables below assume that your vehicle is not subject to a mileage adjustment and that you purchased it new or owned it on September 18, 2015 when the emissions accusations became public and still own it. If you no longer have your vehicle, or if you purchased it used after September 18, 2015, then you will be offered a lesser amount.

Settlement Payments To Generation Two Owners

If Emissions Compliant Repair Timely Available

Find your vehicle's Model Year, Model, and Trim below:	Emissions Compliant Repair Receive an Emissions Compliant Repair and a payment of:
<u>Model</u>	<u>Owner Repair Payment</u>
2013 Porsche Cayenne	\$8,229 - \$8,629
2013 Audi Q7 TDI Prestige S-Line	\$8,492 - \$9,112
2013 Audi Q7 TDI Premium	\$7,424 - \$7,687
2013 Audi Q7 TDI Premium Plus	\$7,842 - \$8,039
2013 Audi Q7 TDI Prestige	\$8,274 - \$8,834
2013 Volkswagen Touareg TDI Executive	\$7,704 - \$7,752
2013 Volkswagen Touareg TDI Lux	\$7,322 - \$7,369
2013 Volkswagen Touareg TDI Sport	\$7,039 - \$7,087
2013 Volkswagen Touareg TDI Sport Navigation	\$7,124 - \$7,172
2014 Audi A6 TDI Premium Plus	\$8,014 - \$8,349
2014 Audi A6 TDI Prestige	\$8,407 - \$8,989
2014 Audi A7 TDI Premium Plus	\$8,909 - \$9,237
2014 Audi A7 TDI Prestige	\$9,404 - \$9,979
2014 Audi A8 TDI L	\$9,664 - \$10,534
2014 Porsche Cayenne	\$9,014 - \$9,447
2014 Porsche Cayenne Platinum	\$9,552 - \$9,819
2014 Audi Q5 TDI Premium Plus S-Line	\$8,259 - \$8,507
2014 Audi Q5 TDI Premium Plus	\$7,887 - \$8,197
2014 Audi Q5 TDI Prestige	\$8,464 - \$8,849
2014 Audi Q5 TDI Prestige S-Line	\$8,839 - \$9,114
2014 Audi Q7 TDI Prestige S-Line	\$9,014 - \$9,594
2014 Audi Q7 TDI Premium	\$8,112 - \$8,342
2014 Audi Q7 TDI Premium Plus	\$8,322 - \$8,567
2014 Audi Q7 TDI Prestige	\$8,939 - \$9,492
2014 Volkswagen Touareg TDI R-Line	\$8,364 - \$8,419
2014 Volkswagen Touareg TDI Executive	\$8,397 - \$8,409
2014 Volkswagen Touareg TDI Lux	\$7,772 - \$7,784
2014 Volkswagen Touareg TDI Sport	\$7,527 - \$7,582
2015 Audi A6 TDI Premium Plus	\$8,562 - \$8,884
2015 Audi A6 TDI Prestige	\$8,912 - \$9,509
2015 Audi A7 TDI Premium Plus	\$9,532 - \$9,847
2015 Audi A7 TDI Prestige	\$10,024 - \$10,614

Find your vehicle's Model Year, Model, and Trim below:	Emissions Compliant Repair Receive an Emissions Compliant Repair and a payment of:
<u>Model</u>	<u>Owner Repair Payment</u>
2015 Audi A8 TDI L	\$10,584 - \$11,519
2015 Porsche Cayenne	\$9,633 - \$10,236
2015 Audi Q5 TDI Premium Plus S-Line	\$8,278 - \$8,675
2015 Audi Q5 TDI Premium Plus	\$8,087 - \$8,442
2015 Audi Q5 TDI Prestige	\$8,687 - \$9,005
2015 Audi Q5 TDI Prestige S-Line	\$8,963 - \$9,238
2015 Audi Q7 TDI Premium	\$8,339 - \$8,531
2015 Audi Q7 TDI Premium Plus	\$8,744 - \$8,927
2015 Audi Q7 TDI Prestige	\$9,286 - \$9,861
2015 Audi Q7 TDI Prestige S-Line	\$9,447 - \$9,947
2015 Volkswagen Touareg TDI Executive	\$8,962 - \$9,117
2015 Volkswagen Touareg TDI Lux	\$8,379 - \$8,534
2015 Volkswagen Touareg TDI Sport Technology	\$8,096 - \$8,104
2016 Audi A6 TDI Premium Plus	\$9,156 - \$9,963
2016 Audi A6 TDI Prestige	\$9,546 - \$10,885
2016 Audi A7 TDI Premium Plus	\$10,209 - \$10,895
2016 Audi A7 TDI Prestige	\$10,402 - \$12,919
2016 Audi A8 TDI L	\$11,524 - \$12,458
2016 Porsche Cayenne	\$9,391 - \$16,114
2016 Audi Q5 TDI Premium Plus S-Line	\$8,728 - \$9,121
2016 Audi Q5 TDI Premium Plus	\$8,137 - \$9,035
2016 Audi Q5 TDI Prestige	\$8,731 - \$9,847
2016 Audi Q5 TDI Prestige S-Line	\$8,731 - \$10,009
2016 Volkswagen Touareg TDI Executive	\$9,435 - \$9,601
2016 Volkswagen Touareg TDI Lux	\$8,680 - \$9,090
2016 Volkswagen Touareg TDI Sport Technology	\$8,169 - \$8,604

If Emissions Compliant Repair Not Timely Available

Find your vehicle's Model Year, Model, and Trim below:	Option 1: Buyback Sell your vehicle back to Volkswagen plus receive a payment for a combined total of: <i>or</i> Trade-In Receive an equivalent Trade-In Credit of:	Option 2: Approved Emissions Modification (if available) Keep your vehicle and get a free modification to reduce emissions and a payment of:
<u>Model</u>	<u>Option 1 Amount</u>	<u>Option 2 Amount</u>
2013 Porsche Cayenne	\$58,953 - \$75,141	\$14,678 - \$29,106
2013 Audi Q7 TDI Prestige S-Line	\$59,959 - \$70,296	\$13,653 - \$19,630
2013 Audi Q7 TDI Premium	\$48,028 - \$53,225	\$13,328 - \$17,236
2013 Audi Q7 TDI Premium Plus	\$52,428 - \$58,766	\$13,428 - \$18,626
2013 Audi Q7 TDI Prestige	\$56,503 - \$66,930	\$13,503 - \$19,126
2013 Volkswagen Touareg TDI Executive	\$49,803 - \$54,433	\$11,528 - \$15,733
2013 Volkswagen Touareg TDI Lux	\$45,978 - \$50,226	\$11,428 - \$15,251
2013 Volkswagen Touareg TDI Sport	\$43,153 - \$46,781	\$11,353 - \$14,606

Find your vehicle's Model Year, Model, and Trim below:	Option 1: Buyback Sell your vehicle back to Volkswagen plus receive a payment for a combined total of: <i>or</i> Trade-In Receive an equivalent Trade-In Credit of:	Option 2: Approved Emissions Modification (if available) Keep your vehicle and get a free modification to reduce emissions and a payment of:
Model	Option 1 Amount	Option 2 Amount
2013 Volkswagen Touareg TDI Sport Navigation	\$44,003 - \$48,053	\$11,378 - \$15,003
2014 Audi A6 TDI Premium Plus	\$53,903 - \$61,978	\$13,878 - \$19,003
2014 Audi A6 TDI Prestige	\$57,828 - \$70,965	\$13,978 - \$21,915
2014 Audi A7 TDI Premium Plus	\$62,853 - \$70,911	\$14,578 - \$20,540
2014 Audi A7 TDI Prestige	\$67,803 - \$81,397	\$14,678 - \$23,172
2014 Audi A8 TDI L	\$72,631 - \$94,008	\$17,817 - \$31,433
2014 Porsche Cayenne	\$66,103 - \$92,318	\$14,503 - \$39,068
2014 Porsche Cayenne Platinum	\$70,803 - \$86,894	\$14,578 - \$29,494
2014 Audi Q5 TDI Premium Plus S-Line	\$57,853 - \$64,496	\$14,478 - \$19,513
2014 Audi Q5 TDI Premium Plus	\$53,053 - \$59,633	\$12,903 - \$17,628
2014 Audi Q5 TDI Prestige	\$59,078 - \$67,247	\$13,028 - \$19,348
2014 Audi Q5 TDI Prestige S-Line	\$63,653 - \$72,104	\$14,578 - \$20,854
2014 Audi Q7 TDI Prestige S-Line	\$64,603 - \$75,626	\$13,903 - \$21,249
2014 Audi Q7 TDI Premium	\$55,728 - \$61,566	\$13,703 - \$18,466
2014 Audi Q7 TDI Premium Plus	\$57,653 - \$65,344	\$13,728 - \$19,844
2014 Audi Q7 TDI Prestige	\$63,153 - \$75,399	\$13,828 - \$21,799
2014 Volkswagen Touareg TDI R-Line	\$56,403 - \$61,693	\$12,528 - \$17,393
2014 Volkswagen Touareg TDI Executive	\$56,728 - \$61,583	\$12,578 - \$17,383
2014 Volkswagen Touareg TDI Lux	\$50,478 - \$54,708	\$12,428 - \$16,608
2014 Volkswagen Touareg TDI Sport	\$48,028 - \$52,481	\$12,328 - \$16,356
2015 Audi A6 TDI Premium Plus	\$59,378 - \$68,617	\$14,503 - \$20,892
2015 Audi A6 TDI Prestige	\$62,878 - \$76,478	\$14,578 - \$22,828
2015 Audi A7 TDI Premium Plus	\$69,378 - \$79,028	\$15,003 - \$21,853
2015 Audi A7 TDI Prestige	\$74,003 - \$88,246	\$14,778 - \$23,771
2015 Audi A8 TDI L	\$83,450 - \$103,921	\$20,650 - \$34,062
2015 Porsche Cayenne	\$74,150 - \$108,462	\$15,899 - \$45,911
2015 Audi Q5 TDI Premium Plus S-Line	\$60,556 - \$66,894	\$14,171 - \$20,032
2015 Audi Q5 TDI Premium Plus	\$54,834 - \$64,356	\$12,559 - \$19,081
2015 Audi Q5 TDI Prestige	\$61,256 - \$71,948	\$12,859 - \$21,276
2015 Audi Q5 TDI Prestige S-Line	\$65,222 - \$74,931	\$14,209 - \$22,393
2015 Audi Q7 TDI Premium	\$57,150 - \$63,339	\$13,521 - \$18,030
2015 Audi Q7 TDI Premium Plus	\$61,878 - \$70,789	\$14,103 - \$22,089
2015 Audi Q7 TDI Prestige	\$67,369 - \$79,342	\$14,289 - \$21,837
2015 Audi Q7 TDI Prestige S-Line	\$68,233 - \$83,383	\$14,369 - \$25,419
2015 Volkswagen Touareg TDI Executive	\$62,384 - \$68,926	\$13,437 - \$18,803
2015 Volkswagen Touareg TDI Lux	\$56,552 - \$62,957	\$13,402 - \$18,482
2015 Volkswagen Touareg TDI Sport Technology	\$53,723 - \$58,223	\$13,067 - \$17,567
2016 Audi A6 TDI Premium Plus	\$67,803 - \$78,791	\$15,305 - \$21,854
2016 Audi A6 TDI Prestige	\$71,488 - \$87,404	\$15,387 - \$22,325
2016 Audi A7 TDI Premium Plus	\$78,407 - \$88,259	\$15,735 - \$22,670
2016 Audi A7 TDI Prestige	\$79,787 - \$111,001	\$15,328 - \$25,106

Find your vehicle's Model Year, Model, and Trim below:	Option 1: Buyback Sell your vehicle back to Volkswagen plus receive a payment for a combined total of: <i>or</i> Trade-In Receive an equivalent Trade-In Credit of:	Option 2: Approved Emissions Modification (if available) Keep your vehicle and get a free modification to reduce emissions and a payment of:
Model	Option 1 Amount	Option 2 Amount
2016 Audi A8 TDI L	\$91,604 - \$103,659	\$18,288 - \$26,875
2016 Porsche Cayenne	\$72,643 - \$144,771	\$14,120 - \$25,417
2016 Audi Q5 TDI Premium Plus S-Line	\$61,561 - \$68,753	\$12,909 - \$17,844
2016 Audi Q5 TDI Premium Plus	\$55,360 - \$68,726	\$12,571 - \$18,180
2016 Audi Q5 TDI Prestige	\$64,279 - \$77,534	\$13,136 - \$18,807
2016 Audi Q5 TDI Prestige S-Line	\$64,151 - \$79,745	\$13,249 - \$19,430
2016 Volkswagen Touareg TDI Executive	\$67,109 - \$73,686	\$13,838 - \$19,325
2016 Volkswagen Touareg TDI Lux	\$60,448 - \$68,329	\$13,776 - \$19,343
2016 Volkswagen Touareg TDI Sport Technology	\$55,961 - \$63,052	\$13,288 - \$17,938

Settlement Payments to Generation Two Lessees

The tables below show the range of possible payment amounts to Generation Two lessees under the 3.0-liter Class Action Settlement. As described in the previous section, if an Emissions Compliant Repair for your vehicle is available on time, you will be offered the repair and a Repair Payment. The Repair Payment for lessees of Generation Two vehicles is \$2,000 as shown in the first table below.

If an Emissions Compliant Repair for your vehicle is not available on time, you will instead be offered a Lease Termination or Approved Emissions Modification, and a payment. The Reduced Emissions Modification or Emissions Compliant Repair option will only be available if approved by the EPA and CARB. The amount you receive will be the same whether you choose a Lease Termination, Approved Emissions Modification, or no longer have an active lease, and depends on your vehicle's model year, model, and factory options as shown in the second table below. If an Emissions Compliant Repair is not available on time, payments to Generation Two lessees range from \$5,677 to \$12,492.

These tables assume that you leased a vehicle with VW Credit, Inc., Audit Credit, or Porsche Financial Services, Inc. on September 18, 2015 and/or November 2, 2015 when the emissions accusations became public. If you purchased your leased vehicle before January 31, 2017 and still own it, then you will be treated as an owner for purposes of the Settlement and should use the tables in the owner section above to find your range of possible payments.

If Emissions Compliant Repair Timely Available

Find your vehicle's Model Year, Model, and Trim below:	Emissions Compliant Repair Receive an Emissions Compliant Repair and a payment of:
Model	Repair Payment Amount
All Models	\$2,000

If Emissions Compliant Repair *Not* Timely Available

Find your vehicle's Model Year, Model, and Trim below:	Approved Emissions Modification or Lease Termination Receive an Approved Emissions Modification or a Lease Termination, and a payment of:
Model	Lessee Restitution
2013 Porsche Cayenne	\$5,902 - \$8,405
2013 Audi Q7 TDI Prestige S-Line	\$7,780 - \$8,875
2013 Audi Q7 TDI Premium	\$6,785 - \$7,838
2013 Audi Q7 TDI Premium Plus	\$6,214 - \$8,350
2013 Audi Q7 TDI Prestige	\$6,985 - \$8,707
2013 Volkswagen Touareg TDI Executive	\$7,014 - \$7,549
2013 Volkswagen Touareg TDI Lux	\$6,305 - \$7,338
2013 Volkswagen Touareg TDI Sport	\$5,677 - \$7,136
2013 Volkswagen Touareg TDI Sport Navigation	\$5,689 - \$7,228
2014 Audi A6 TDI Premium Plus	\$6,439 - \$8,721
2014 Audi A6 TDI Prestige	\$6,489 - \$9,279
2014 Audi A7 TDI Premium Plus	\$7,586 - \$9,513
2014 Audi A7 TDI Prestige	\$6,839 - \$9,858
2014 Audi A8 TDI L	\$7,302 - \$10,636
2014 Porsche Cayenne	\$6,189 - \$8,760
2014 Porsche Cayenne Platinum	\$7,229 - \$9,067
2014 Audi Q5 TDI Premium Plus S-Line	\$6,783 - \$8,311
2014 Audi Q5 TDI Premium Plus	\$5,977 - \$8,268
2014 Audi Q5 TDI Prestige	\$6,014 - \$8,482
2014 Audi Q5 TDI Prestige S-Line	\$6,506 - \$8,447
2014 Audi Q7 TDI Prestige S-Line	\$6,452 - \$9,339
2014 Audi Q7 TDI Premium	\$7,747 - \$8,378
2014 Audi Q7 TDI Premium Plus	\$6,364 - \$8,833
2014 Audi Q7 TDI Prestige	\$6,514 - \$9,133
2014 Volkswagen Touareg TDI R-Line	\$6,264 - \$8,515
2014 Volkswagen Touareg TDI Executive	\$6,289 - \$8,692
2014 Volkswagen Touareg TDI Lux	\$6,214 - \$8,304
2014 Volkswagen Touareg TDI Sport	\$6,189 - \$8,030
2015 Audi A6 TDI Premium Plus	\$6,789 - \$9,292
2015 Audi A6 TDI Prestige	\$6,827 - \$9,818
2015 Audi A7 TDI Premium Plus	\$8,759 - \$9,677
2015 Audi A7 TDI Prestige	\$6,927 - \$10,103
2015 Audi A8 TDI L	\$7,902 - \$11,935
2015 Porsche Cayenne	\$5,821 - \$8,951
2015 Audi Q5 TDI Premium Plus S-Line	\$5,980 - \$8,338
2015 Audi Q5 TDI Premium Plus	\$5,805 - \$8,377
2015 Audi Q5 TDI Prestige	\$5,930 - \$8,360
2015 Audi Q5 TDI Prestige S-Line	\$5,974 - \$8,659
2015 Audi Q7 TDI Premium	\$7,073 - \$8,553
2015 Audi Q7 TDI Premium Plus	\$6,577 - \$9,247
2015 Audi Q7 TDI Prestige	\$6,645 - \$9,557
2015 Audi Q7 TDI Prestige S-Line	\$6,710 - \$9,822
2015 Volkswagen Touareg TDI Executive	\$6,719 - \$9,550
2015 Volkswagen Touareg TDI Lux	\$6,701 - \$9,241

Find your vehicle's Model Year, Model, and Trim below:	Approved Emissions Modification or Lease Termination Receive an Approved Emissions Modification or a Lease Termination, and a payment of:
Model	Lessee Restitution
2015 Volkswagen Touareg TDI Sport Technology	\$6,534 - \$8,783
2016 Audi A6 TDI Premium Plus	\$7,249 - \$10,214
2016 Audi A6 TDI Prestige	\$7,104 - \$10,564
2016 Audi A7 TDI Premium Plus	\$7,204 - \$10,451
2016 Audi A7 TDI Prestige	\$8,181 - \$11,173
2016 Audi A8 TDI L	\$11,143 - \$12,492
2016 Porsche Cayenne	\$6,227 - \$10,276
2016 Audi Q5 TDI Premium Plus S-Line	\$5,955 - \$8,371
2016 Audi Q5 TDI Premium Plus	\$5,930 - \$8,382
2016 Audi Q5 TDI Prestige	\$7,656 - \$8,633
2016 Audi Q5 TDI Prestige S-Line	\$7,039 - \$7,039
2016 Volkswagen Touareg TDI Executive	\$7,095 - \$9,874
2016 Volkswagen Touareg TDI Lux	\$6,873 - \$9,639
2016 Volkswagen Touareg TDI Sport Technology	\$6,782 - \$8,713

Attorneys' Fees

The Court must approve all plaintiffs' attorneys' fees and costs. Volkswagen has agreed to pay any Class Counsel/common benefit attorneys' fees and costs that the Court ultimately approves. Any fees and costs will be in addition to the compensation provided to Class Members under the 3.0-liter Class Action Settlement and therefore will not reduce Class Members' compensation.

For More Information

This is only a summary of the Settlement benefits. The full details of the 3.0-liter Class Action Settlement and the texts of the US/CA Settlement and FTC Order are available online at www.VWCourtSettlement.com.