

**NOTICE OF HEARING FOR THE APPROVAL OF THE SETTLEMENT AGREEMENT
IN THE CLASS ACTION OF THE AQLPA AND ANDRÉ BÉLISLE**

**V.
VOLKSWAGEN GROUP AG ET AL.**

**To all natural persons residing or who did reside in Quebec at any time between
January 1st, 2009 and September 21, 2015
(hereinafter designated as the “Settlement Class”).**

PLEASE READ THIS NOTICE CAREFULLY. IT COULD AFFECT YOUR RIGHTS.

I. NATURE OF THE PROCEEDINGS

On January 24, 2018, the Superior Court for the District of Quebec authorized a Class Action on behalf of all Quebec residents against Volkswagen and Audi, claiming punitive damages in the amount of \$35 per person for having manufactured and marketed vehicles that violated environmental standards limiting nitrogen oxide emissions polluting the atmosphere, which, according to the Plaintiff’s allegations, unlawfully and intentionally interfered with fundamental rights to a “healthful environment” and to “personal security [and] inviolability”, rights enshrined in sections 1 and 46.1 of the *Quebec Charter of Human Rights and Freedoms* (the Quebec Charter).

The following entities were named as Defendants in those proceedings:

- Volkswagen Group Canada Inc.;
- Volkswagen Group of America Inc.;
- Volkswagen Aktiengesellschaft;
- Audi Canada Inc.;
- Audi of America Inc.;
- Audi of America LLC;
- Audi Aktiengesellschaft;

(hereinafter designated as « **VW** »)

Following the authorization of the Québec Class Action, Volkswagen AG pleaded guilty to 60 offences under the *Canadian Environmental Protection Act* (S.C. 1999, ch. 33), resulting in a fine of 196.5 million dollars, of which 50 million dollars was allocated to support environmental projects in Québec. The payment is being administered by the *Environmental Damages Fund* (“**EDF**”).

II. PROPOSED SETTLEMENT

The Parties have now agreed to settle the Class Action. VW does not admit liability but has agreed to pay 6.7 million Canadian dollars for the purpose of carrying out additional environmental projects in Quebec and to fully and finally resolve the disputed claim for damages, fees, taxes and costs.

Once the total amount of the fees, taxes and costs have been paid, the balance shall be used to carry out additional environmental projects in Quebec.

III. THE SETTLEMENT AGREEMENT APPROVAL HEARING

A hearing of the Application for Approval of the Settlement Agreement will be held on December 21, 2021. At that hearing, the Court will determine whether the Agreement is just, reasonable and in the best interests of the Class Members.

Class Members affected by the Settlement Agreement who have no objection to raise with respect to the settlement need not attend the hearing of the Application for Approval of the Settlement Agreement and need take no further action.

Class Members affected by the Settlement Agreement may appear and make representations at the hearing to approve the Settlement Agreement. If you wish to comment on, or if you object to the settlement, you must send your representations in writing to Class Counsel at the address indicated below. Your submission must be postmarked no later than December 15, 2021. Class Counsel will send the Court all representations that they will have received. The Court will examine all written representations in due course. If you fail to send your representations before December 15, 2021, you might not be permitted to participate in the Settlement Agreement approval hearing, either by way of oral representations or otherwise.

V. CLASS COUNSEL AND LEGAL COSTS

The law firm Bouchard + Avocats inc. represents the Class Members affected by the Settlement Agreement and they may be reached:

By telephone: 418-622-6699

By email: recourscollectifs@bouchardavocats.com

By mail: 825, boulevard Lebourgneuf, bureau 200, Québec (Québec) G2J 0B9

Attention: Me Stéphane Pagé.

The extrajudicial fees and disbursements of Class Counsel must be approved by the Court. Class Counsel will petition for extrajudicial fees equivalent to 30% of the Settlement Agreement concluded with Volkswagen, plus applicable disbursements and taxes approved by the Court and paid out of the amount of the settlement.

VI. ADDITIONAL INFORMATION

This Notice contains only a summary of certain provisions of the Settlement Agreement. Class Members affected by the settlement who wish to learn more about the settlement may consult the full text of the Settlement Agreement at the website

https://bouchardavocats.com/action_collective/volkswagen-audi

VII. INTERPRETATION

This Notice contains only a summary of certain provisions of the Settlement Agreement. In the event of any inconsistency between the provisions of this Notice and those of the Settlement Agreement, the provisions of the Settlement Agreement shall prevail.