

<p style="text-align: center;">NOTICE OF HEARING IN CANADIAN AUTO PARTS PRICE-FIXING CLASS ACTIONS</p>
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**If you bought or leased, directly or indirectly, a new or used Automotive Vehicle or certain automotive parts from 2004 to 2023 you should read this notice carefully.
It may affect your legal rights.**

A. WHAT IS A CLASS ACTION?

A class action is a lawsuit filed by one person on behalf of a large group of people.

B. WHAT ARE THESE CLASS ACTIONS ABOUT?

Class actions have been started in Canada claiming that many companies participated in conspiracies to fix the prices of automotive parts sold in Canada and/or sold to manufacturers for installation in Automotive Vehicles¹ sold in Canada.

The class actions were started in British Columbia, Ontario and/or Quebec, but include Canadian residents in all provinces and territories. The class actions claim that the companies that sell the relevant automotive parts were involved in conspiracies to illegally increase the prices of these products. These class actions seek damages from the companies because of the alleged conspiracies.

C. WHAT IS THIS NOTICE ABOUT?

This notice is about proposed settlements relating to Braking Systems, and Door Latches and Closure Systems (the “Relevant Parts”). A description of the Relevant Parts is included in Schedule A hereto.

This notice is also about proposed amendments to the Third Omnibus Distribution Protocol.

Copies of the proposed settlements, proposed amended Third Omnibus Distribution Protocol and unofficial French translations thereof are available online at www.autopartsettlement.ca, www.sotosclassactions.com/auto-parts, or www.siskinds.com/autoparts.

D. WHO IS AFFECTED BY THE CLASS ACTIONS?

This notice affects the following persons:

Persons Affected by the Proposed Settlements (Part E)

The Braking Systems, and Door Latches and Closure Systems actions were certified as class proceedings as against the Settling Defendants for the purposes of implementing the settlement agreements.

¹ In the Settlement Agreements, Automotive Vehicle is defined as: all passenger cars, sport utility vehicles (SUVs), vans, and light trucks (up to 10,000 lbs).

You are affected by the class actions mentioned above and are a “member” of the settlement class of those actions, if you are a person in Canada who, during the relevant class period (see Schedule A):

- purchased or leased, directly or indirectly, a new or used Automotive Vehicle in Canada;
- purchased a new or used Automotive Vehicle for import into Canada; or
- purchased, directly or indirectly, a Relevant Part in Canada.

Persons Affected by the Proposed Amendments to the Third Omnibus Distribution Protocol (Part I)

Part I lists proposed amendments to the Third Omnibus Distribution Protocol. The Protocol applies to the following actions: Air Conditioning Systems, Anti-Vibration Rubber Parts, Autolights, Automotive Exhaust Systems, Braking Systems, Door Latches & Closure Systems, Ignition Coils, Instrument Panel Clusters, and Shock Absorbers.

E. WHAT SETTLEMENTS HAVE BEEN REACHED IN THE CLASS ACTIONS?

A settlement is when a defendant agrees to pay money to the members of the class action in exchange for full release of the claims against them, without admitting liability for any of the claims.

The defendants listed below (the “Settling Defendants”) have agreed to pay the amounts set out below in exchange for a full release of the claims against them relating to the pricing of the Relevant Parts and for the dismissal of any actions commenced in Canada by settlement class members relating to the pricing of the Relevant Parts. The settlements are a compromise of disputed claims. The Settling Defendants do not admit any liability, wrongdoing, or fault.

Continental AG, Continental Automotive GMBH, Continental Automotive Systems, Inc., and Continental Tire Canada, Inc. (formerly known as Continental Automotive Canada, Inc.)	
Braking Systems	CDN\$568,067
Magna International Inc. and Magna Closures Inc.	
Door Latches and Closure Systems	US\$100,000

F. APPROVAL HEARINGS

The settlements and the proposed amendments to the Third Omnibus Distribution Protocol are subject to the approval of the Ontario Court. The Ontario Court will hold a hearing by videoconference to decide whether to approve these settlements and the proposed amendments on July 16, 2025, at 10:00.

The Ontario Court will decide whether the settlements are fair, reasonable, and in the best interests of settlement class members.

If approved, these settlements will resolve the automotive parts litigation in its entirety.

The Quebec Court will hold a hearing by videoconference (<https://msteams.link/BLGK>)² to decide whether to approve the proposed amendments to the Third Omnibus Distribution Protocol on September 17, 2025, at 9:00.

G. HOW CAN I PARTICIPATE IN THE SETTLEMENT APPROVAL HEARINGS?

If you are a member of a settlement class, you can present your submissions on, or objections to, the settlements, proposed amendments to the Third Omnibus Distribution Protocol and/or Class Counsel fees (see part K below) before the Ontario or Quebec Courts, as appropriate, in the manner set out below.

Submissions in writing

If you want to address the Courts in writing, you must send your written submissions to Class Counsel by email to autopartsclassaction@siskinds.com no later than July 11, 2025.

The written submissions must state the nature of any comments or objections, and whether you intend to appear at the settlement approval hearings. The written submissions can be provided in English or French (where necessary, an unofficial translation will be provided to the Courts).

Class Counsel will provide a copy of any written submissions to the Courts.

Attending the hearing

Settlement class members may (but do not need to) attend the approval hearings.

You may attend the Ontario hearing virtually on **July 16, 2025 at 10:00**, as an observer or to make oral submissions to the Court. If you wish to attend and/or make oral submissions, please contact Class Counsel no later than July 11, 2025. If you are unable to attend, but wish to make oral submissions to the Ontario Court, please contact Class Counsel at autopartsclassaction@siskinds.com and Class Counsel will make the necessary arrangements for you to make submissions to the Ontario Court.

You may attend the Quebec hearing to approve the amendments to the Third Omnibus Distribution Protocol virtually on **September 17, 2025 at 9:00** (<https://msteams.link/BLGK>)³. You can attend as an observer or to make oral submissions to the Quebec Court. If you are unable to attend, but wish to make oral submissions to the Quebec Court, please contact Class Counsel at recours@siskinds.com, to the attention of Karim Diallo, and Class Counsel will make the necessary arrangements for you to make submissions to the Quebec Court.

H. WHAT IF I DON'T WANT TO BE IN THE CLASS ACTIONS?

Rights to opt-out of the relevant actions were previously provided and have already passed.

² The User Guide to join the hearing can be found at the following address:
https://www.justice.gouv.qc.ca/fileadmin/user_upload/contenu/documents/Fr__français_/centredoc/publications/systeme-judiciaire/MJQ_Guide_Audience_Teams-public_VF.pdf

³ The User Guide to join the hearing can be found at the following address:
https://www.justice.gouv.qc.ca/fileadmin/user_upload/contenu/documents/Fr__français_/centredoc/publications/systeme-judiciaire/MJQ_Guide_Audience_Teams-public_VF.pdf

I. WHAT HAPPENS TO THE MONEY PAID UNDER THE SETTLEMENTS?

At this stage, the settlement funds (less approved fees and expenses) are being held in interest-bearing trust accounts for the benefit of settlement class members.

The Ontario, Quebec and/or BC Courts approved the Third Omnibus Distribution Protocol – which deals with the distribution of the aggregate settlement funds of approximately \$50 million in the Air Conditioning Systems, Anti-Vibration Rubber Parts, Autolights, Automotive Exhaust Systems, Braking Systems, Door Latches & Closure Systems, Ignition Coils, Instrument Panel Clusters, and Shock Absorbers actions, plus accrued interest, less Court approved legal fees and other expenses.

The claims process for the Third Omnibus Distribution Protocol has not yet commenced.

At the hearings, Class Counsel will be seeking the following amendments to the Third Omnibus Distribution Protocol.

First, as the Braking Systems and Door Latches & Closure Systems actions are now resolved (assuming the settlements are approved), those settlement funds will be distributed as part of the Third Omnibus Distribution Protocol.

Second, to avoid fraud in the claims process and reduce the cost of the administration, End User claims (including consumer claims) must be substantiated by Automaker data and/or contemporaneous proof of purchase provided with the claim. It is expected that Automaker data will be available for most End User claims.

In accordance with Court orders, the Automakers provided customer information to the Claims Administrator to facilitate the claims process. No wrongdoing is alleged as against the Automakers and they were not involved in the auto parts class actions.

Third, a provision was added to the effect that Settlement Class Members cannot participate in the distribution where they were fully compensated by virtue of their claim value being minimal and their payments being increased by more than \$20 to the minimum administrative payment of \$25 in the Second Omnibus Distribution.

Fourth, the appeal process is amended to provide the Claims Administrator an opportunity to reconsider its claim decision.

J. APPLYING FOR SETTLEMENT FUNDS IN THE THIRD OMNIBUS DISTRIBUTION

Information about how to apply for the settlement funds will be available in a future notice and will be posted online at: www.siskinds.com/autoparts and <https://www.sotosclassactions.com/auto-parts/>. If you did not receive this notice by mail or email, please register online at: www.siskinds.com/autoparts or by telephone at 1-888-977-9806 to ensure that further notices will be sent to you directly, by mail or email.

You should keep records of any purchases or leases of new Automotive Vehicles covered in the Third Omnibus Distribution Protocol. These may be required for your claim.

K. WHO ARE THE LAWYERS WORKING ON THESE CLASS ACTIONS AND HOW ARE THEY PAID?

The following law firms represent members in one or more of the relevant actions.

In Ontario, the law firms of Siskinds LLP and Sotos LLP can be reached at:

Siskinds LLP
Telephone (toll free): 1-800-461-6166
Email: autoparts@siskinds.com
Mail: 275 Dundas Street, Unit 1, London,
ON N6B 3L1
Attention: Linda Visser

Sotos LLP
Telephone (toll free): 1-888-977-9806
Email: autoparts@sotosllp.com
Mail: 180 Dundas Street West, Suite 1200,
Toronto, ON M5G 1Z8
Attention: Jean-Marc Leclerc

In British Columbia, the law firm of Camp Fiorante Matthews Mogerman LLP can be reached at:

Telephone: 1-800-689-2322
Email: blee@cfmlawyers.ca
Mail: #400 – 856 Homer Street, Vancouver, BC V6B 2W5 Attention: David Jones

In Quebec, the law firm of Siskinds Desmeules s.e.n.c.r.l. can be reached at:

Telephone: 418-694-2009
Email: recours@siskinds.com
Mail: Les promenades du Vieux-Quebec, 43 rue De Buade, bureau 320, Quebec City, QC G1R 4A2
Attention: Karim Diallo

As an individual, you do not have to pay the lawyers working on these class actions any money out-of-pocket. The lawyers will be paid from the money collected in these class actions. The Ontario Court will be asked to decide how much the lawyers will be paid. The lawyers will collectively be asking that the Court approve legal fees of up to 25% of the settlement funds, plus disbursements and applicable taxes. Any approved legal fees will be paid out of the settlement funds.

L. WHERE CAN I ASK MORE QUESTIONS?

For more information, and relevant documents (including copies of the settlement agreements, distribution protocol, and (unofficial) French translations thereof), visit www.siskinds.com/autoparts.

For copies of the Ontario statements of claim, visit the Canadian Class Action Database at: <http://www.cba.org/Publications-Resources/Class-Action-Database>.

For copies of the Quebec motions for authorization or to receive more information about class actions in Quebec, visit the Quebec Registry of Class Actions at <https://www.registredesactionscollectives.quebec/>.

To receive future notices and updates regarding the auto parts class actions, register online at www.siskinds.com/autoparts.

If you have questions that are not answered online, please contact Class Counsel at the numbers listed above.

M. INTERPRETATION

This notice contains a summary of some of the terms of the settlement agreements listed in part E and the proposed amended distribution protocol. If there is a conflict between the provisions of this notice and the settlement agreements or proposed amended distribution protocol, the terms of the settlement agreements or proposed amended distribution protocol, as applicable, shall prevail.

Schedule “A” – Part Descriptions and Settlement Class Period

Part	Description	Settlement Class Period
Braking Systems	<p>Braking Systems means hydraulic and electronic braking systems.</p> <p>Hydraulic braking systems consist of an actuation system and a foundation system. The actuation system is further made up of a brake booster and main brake cylinder, while the foundation system is further made up of a disc brake with saddle or drum brake and wheel brake cylinder.</p> <p>Electronic braking systems prevent automobiles from skidding by providing electronic stability controls when braking (anti lock braking system or “ABS”) or under all driving conditions (electronic stability control or “ESC”).</p> <p>Both Hydraulic Braking Systems and Electronic Braking Systems can be contained within the same vehicle.</p>	February 1, 2007 to February 8, 2021
Door Latches & Closure Systems	<p>Door Latches includes side-door latches and latch minimodules (also known as minimodule latches). Latches and strikers are used to secure automotive side and sliding doors, tailgates and trunks. Latch minimodules include the side-door latches and all of the related mechanical operating components, including the electric lock function.</p> <p>Closure Systems means devices to maintain and control access to a vehicle and to reliably open and close a vehicle’s doors, lift-gates, trunks, hoods and door windows in order to protect the vehicle and its occupants. Closure systems encompass various components such as latches, strikers, window systems (including window regulators) and door modules. Latches and strikers are used to secure automotive side and sliding doors, tailgates and trunks. Latches are technologically advanced complex products, whereas strikers are simpler commodity products. Window regulators are manual or electronic window lift assemblies for front and rear door applications in vehicles to automatically raise or lower windows. Depending on the customer's preferences, window regulators may be integrated into door modules or procured on a stand-alone basis. A door module is an assembly of components that operate the door's electronic and mechanical functionalities. It consists of a rubber-sealed carrier, onto which a variety of door components such as the window lift mechanism, the wing mirror electric motor, the wiring, the loud speaker, the door latch inner release cable, a latch and various switches are fitted, forming a “cassette”.</p>	<p>Door Latches: January 1, 2004 to April 21, 2022</p> <p>Closure Systems: January 1, 2004 to January 4, 2023</p>