

**NOTICE OF PROPOSED SETTLEMENT
IN THE CANADIAN AUTOMOTIVE BEARINGS PRICE-FIXING CLASS ACTION**

**If you bought or leased, directly or indirectly, a new or used Automotive Vehicle or Automotive Bearings from April 20, 1998 to July 9, 2020, 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 IS THIS CLASS ACTION ABOUT?

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

This class action was started in Ontario and Quebec but includes Canadian residents in all provinces and territories. The class action claims that the companies that sell Automotive Bearings were involved in conspiracies to illegally increase the prices of these parts. The class action asks the applicable Courts to require these companies to return any extra money they may have received due to the alleged conspiracies.

C. WHAT IS THIS NOTICE ABOUT?

This notice is about a proposed Settlement in the Automotive Bearings action. Automotive Bearings² means a friction-reducing device installed in new Automotive Vehicles that allows one moving part to glide past another moving part and includes automotive wheel hub unit bearings.

D. WHO IS AFFECTED BY THIS CLASS ACTION?

The Automotive Bearings class action was certified as a class proceeding as against the Settling Defendants for the purposes of implementing the Settlement Agreement.

You are affected by the Automotive Bearings class action and are a “member” of the Settlement Class, if you are a person in Canada who between April 20, 1998 to July 9, 2020:

- 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, Automotive Bearings in Canada.

Settlement Class Members were provided a right to opt-out of the Automotive Bearings action in the context of a previous settlement and the deadline for opting out has passed.

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

² Defined as “Bearings” in the Settlement Agreement.

E. WHAT SETTLEMENT HAS BEEN REACHED IN THE AUTOMOTIVE BEARINGS CLASS ACTION?

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 Settling Defendants, AB SKF, SKF USA Inc., SKF Canada Limited, and SKF GmbH, have agreed to pay CDN\$2,100,000 in exchange for a full release of the claims against them relating to the pricing of Automotive Bearings and for the dismissal of any actions commenced in Canada by settlement class members relating to the pricing of Automotive Bearings. The Settling Defendants do not admit any liability, wrongdoing, or fault.

F. SETTLEMENT APPROVAL HEARINGS

The Settlement is subject to the approval of the Ontario and Quebec Courts. However, the Settlement is national in scope. Residents of other Canadian provinces and territories are included in the national class certified in Ontario. Residents of Quebec are included in the class certified in Quebec.

The Ontario Settlement Approval Hearing was on February 13, 2023. The Ontario Court approved the Settlement Agreement as being fair, reasonable, and in the best interests of Settlement Class Members.

The Quebec Settlement Approval Hearing was on March 8, 2023. The Quebec Court initially approved the Settlement Agreement as being fair, reasonable, and in the best interests of Settlement Class Members. However, the Fonds d'aide aux actions collectives³ sought and was granted leave to appeal the approval order on the basis that the Settlement Agreement had not been translated into French. The parties agreed to resolve the appeal, translate the settlement, and publish a second notice of proposed settlement in Quebec. The French Settlement Agreement can be viewed at www.autopartsettlement.ca.

If there are any objections to the proposed settlement, another Settlement Approval Hearing will take place on March 8, 2024 at 2pm, by videoconference (<https://msteams.link/EEF0>)⁴. If there are no objections, the Quebec Court will be asked to issue an order approving the Settlement Agreement without a further hearing.

The BC action was discontinued as against the Settling Defendants.

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

If you are a member of a settlement class, you can present your submissions on, or objections to, the proposed settlement before the Quebec Superior Court, in the manner set out below.

Submissions in writing

If you want to address the Quebec Superior Court in writing, you must send your written submissions to Class Counsel by email to recours@siskinds.com, to the attention of Karim Diallo, no later than March 1st, 2024.

³ The Fonds d'aide is the organization whose function is to provide financial assistance to people wishing to bring a class action, and to disseminate information about bringing such an action.

⁴ 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

The written submissions must state the nature of any comments or objections, and whether you intend to appear at the Settlement Approval Hearing. The written submissions can be provided in English or French (if provided in English, an unofficial translation will be provided to the Quebec Superior Court).

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

Attending in person before the Court

In the event that written objections are received and another Settlement Approval Hearing takes place, Settlement Class Members may (but do not need to) attend the Settlement Approval Hearing virtually. If you are interested in attending, please contact Class Counsel at recours@siskinds.com, to the attention of Karim Diallo, for a link to the hearing. You can attend as an observer or to make oral submissions to the Quebec Superior Court. If you are unable to attend, but wish to make oral submissions to the Quebec Superior 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 Superior Court.

If there is a second approval hearing and you wish to participate in that hearing, please contact Class Counsel no later than March 1st, 2024.

H. WHAT HAPPENS TO THE MONEY PAID UNDER THE SETTLEMENT?

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 BC Courts approved a protocol for the distribution of the aggregate Settlement Funds from the Automotive Bearings actions, plus accrued interest, less Court-approved legal fees and other expenses. A copy of the approved Distribution Protocol is available at www.autopartsettlement.ca.

The protocol contemplates that the administration will run in tandem with the administration of the Second Omnibus Distribution Protocol (which was previously approved by the requisite Courts) and settlement benefits will be calculated in accordance with the Second Omnibus Distribution Protocol. The claims process under the Second Omnibus Distribution Protocol, which will include the settlement benefits from the Automotive Bearings actions has already commenced.

October 30, 2023 was the deadline to submit claims in the Second Omnibus Distribution. Since it will not cause a delay to the administration, Settlement Class Members with a claim ID and PIN are still able to file a claim at www.autopartsettlement.ca. Claim IDs and PINs were sent multiple times from DoNotReply@RicePoint.com (most recently on October 16th and 23rd and on January 17th). Please check your spam folder. If you have not done so, we encourage you to file your claim as soon as possible, as the claims portal will be closed shortly after the hearing on March 8, 2024.

Documents related to the claim process explain how the Settlement Funds will be distributed. A copy of these documents is available at www.autopartsettlement.ca. Below are the details specific to the Automotive Bearings action:

Affected Vehicles are defined as:

Class Action	Automakers	Event Period	Post Event Period
Automotive Bearings	Honda/Acura, Nissan/Infiniti, Toyota/Lexus	Jan 1, 2000 to Dec 31, 2013	Jan 1, 2014 to Sept 30, 2016

No wrongdoing is alleged as against the Automakers listed above. They are not defendants in the class action. The Automakers were unaware of any alleged price-fixing in respect of any of the automotive parts that they purchased for their automotive vehicles.

Distribution to Canadian Automakers:

The following amount will be allocated from the Net Settlement Funds for payment to the Canadian Automakers who purchased at least \$500,000 of Automotive Bearings during the Event Period and/or Post Event Period, and whose claim has not otherwise been released by virtue of the parallel U.S. direct purchaser actions and/or private settlement:

Relevant Part / Class Action	Canadian Automaker	Allocation
Automotive Bearings	Honda Canada Inc.	\$120,000

I. WHO ARE THE LAWYERS WORKING ON THIS CLASS ACTION AND HOW ARE THEY PAID?

The following law firms represent Settlement Class Members in the Automotive Bearings class action.

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

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: autopartsclassaction@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 Mogergerman LLP can be reached at:

Telephone: 1-800-689-2322

Email: aslevin@cfmlawyers.ca

Mail: #400 – 856 Homer Street, Vancouver, BC V6B 2W5

Attention: David Jones

As an individual, you do not have to pay the lawyers working on this class action any money out-of-pocket. The Ontario and Quebec Courts approved legal fees equal to 25% of the Settlement Funds, plus disbursements and applicable taxes. Approved legal fees will be paid out of the Settlement Funds.

J. WHERE CAN I ASK MORE QUESTIONS?

More information about the settlement, the distribution of the Settlement Funds and the claims process is available online at www.autopartsettlement.ca, by email at autoparts@ricepoint.com or by calling toll- free 1-866-474-4331.

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

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

K. INTERPRETATION

This notice contains a summary of some of the terms of the Settlement Agreement and Distribution Protocol. If there is a conflict between the provisions of this notice and the Settlement Agreement or Distribution Protocol, the terms of the Settlement Agreement or Distribution Protocol shall prevail.