

Notice of Certification and Settlement Agreement Approval IN THE MATTER OF CANADIAN SODIUM ERYTHORBATE CLASS ACTION LITIGATION

PLEASE READ THIS NOTICE CAREFULLY. IT MAY AFFECT YOUR LEGAL RIGHTS.

TO: All persons or entities in Canada, who directly or indirectly purchased sodium erythorbate (referred to in this Notice as "SE") in Canada between July 1, 1992 and December 31, 1994.

1 PURPOSE OF THIS NOTICE

Class Proceeding lawsuits have been initiated in Ontario, British Columbia, and Quebec against Pfizer Inc., Pfizer Canada Inc., Fujisawa Pharmaceutical Co., Ltd., and PMP Fermentation Products Inc., in which it is alleged that the Defendants conspired to fix, raise, maintain or stabilize the prices of SE in Canada.

A Settlement Agreement has been reached between the individuals who brought the lawsuit (hereafter the "Plaintiffs") and Pfizer Inc., Pfizer Canada Inc., Fujisawa Pharmaceutical Co., Ltd., and PMP Fermentation Products Inc., (hereafter the "Defendants"). The Settlement Agreement has been approved by the Courts.

This Notice is to advise you of the Settlement Agreement and inform you of your rights as a Class Member under the Agreement. You will be bound by the terms of the Settlement Agreement unless you decide to exclude yourself by opting out of the Settlement Agreement. Opting out is explained in Section 6 of this Notice.

The proceeding was certified and the Settlement Agreement approved by the Courts in Ontario and Quebec, on August 6, 2002, and October 9, 2002, respectively. The Ontario Court certified and approved the settlement on behalf of all persons who directly or indirectly purchased Sodium Erythorbate in Canada, excluding Quebec Class Members, between July 1, 1992 and December 31, 1994.

A separate Notice concerning Quebec consumers was published on August 31, 2002.

2 CLASS MEMBER CATEGORIES

Class Members fall into four categories:

1. Distributors – Class Members who purchased SE between July 1, 1992 and December 31, 1994, and who resold the SE to a further purchaser. Distributors should review Section 3 of this Notice which outlines the Claim Program.
2. Manufacturers - Class Members who purchased SE between July 1, 1992 and December 31, 1994, and manufactured a product of which the SE was a component part. Manufacturers should review Section 3 of this Notice, which outlines the Claim Program.
3. Intermediaries - Class Members who purchased products containing or derived from SE sold by the Defendants between July 1, 1992 and December 31, 1994, and resold the same or virtually the same product to a further purchaser. Intermediaries should review Section 4 of this Notice which outlines the Compensation Plan.
4. Consumers - Class Members who purchased and consumed products containing or derived from SE sold by the Defendants between July 1, 1992 and December 31, 1994 (including Class members who are not members of other categories). Consumers should review Section 4 which outlines the Compensation Plan.

3 CLAIM PROGRAM - DISTRIBUTORS AND MANUFACTURERS

Distributors and Manufacturers will be eligible to receive direct compensation from the Claim Program. The total amount of compensation available to all Distributors and Manufacturers is a maximum of \$1,028,938.93 plus accrued interest less (a) applicable class counsel fees and disbursements, (b) costs of Notice and Administration, and (c) applicable opt out credits. Compensation will be paid out based on

the dollar value of purchases made and will depend on the total number of claims made.

A Distributor or Manufacturer must complete a Claim Form, along with certain required supporting documentation outlined in the Claim Form. To be eligible for compensation, the Claim Form together with the required supporting documentation must be sent to the Claims Administrator and post marked no later than February 8, 2003. Claim forms are available by telephoning the Claims Administrator at 1-866-432-5534 or on the Internet at www.classaction.ca.

4 COMPENSATION PLAN - INTERMEDIARIES AND CONSUMERS (except Quebec consumers)

A fund of at least \$257,234.73 plus accrued interest less (a) applicable class counsel fees and disbursements, and (b) costs of Notice and Administration, shall be available to compensate Intermediaries and Consumers. Recognizing the difficulty of determining the damage suffered by any given Intermediary or Consumer, and recognizing the related difficulties in directly compensating Intermediaries and Consumers, it has been determined that compensation will be paid to the following organizations for the general benefit of Intermediaries and Consumers in the following percentages:

- (a) Boys and Girls Clubs of Canada - 28%.
- (b) The University of Western Ontario Faculty of Law – 28%
- (c) Canadian Partnership for Consumer Food Safety Education – 44%

5 RELEASE OF CLAIMS AND THE EFFECT ON OTHER PROCEEDINGS

You will be bound by the terms of the Settlement Agreement, unless you "opt out", a process that is described in the next section.

This means that you will not be able to bring or maintain any other claim or legal proceeding against the Defendants in connection with SE, unless you "opt out".

6 OPTING OUT OF THE AGREEMENT

If you would like to exclude yourself from the Settlement Agreement, you can opt out by obtaining an opt out form (available from the Claims Administrator), and sending it to the Claims Administrator post marked no later than December 23, 2002.

If you opt out you will not be eligible for any of the benefits of the Agreement.

7 CLASS COUNSEL

The law firm of Siskind, Cromarty, Ivey & Dowler LLP represents Class Members other than consumers in Quebec. Ontario Class Counsel can be reached toll-free at 1-800-461-6166 ext. 455.

The law firms of Sylvestre, Charbonneau, Fafard and Unterberg, Labelle, Lebeau represent Quebec consumers. Quebec Class Counsel can be reached at 514-934-0841.

The entitlement of Plaintiffs' counsel to legal fees and costs of class counsel will be determined by the court and will be deducted from the settlement funds.

8 QUESTIONS ABOUT THE AGREEMENT

If you would like a copy of the Settlement Agreement or have questions, you can call the Claims Administrator's Information Line at 1-866-432-5534. A copy of the Settlement Agreement can be sent to you at a cost of \$20.00 per copy, which amount represents the cost of photocopying and mailing the Agreement.

9 INTERPRETATION

If there is a conflict between the provisions of this Notice and the Settlement Agreement and any of its appendices, the terms of the Settlement Agreement shall prevail.

MAILING OF THIS NOTICE HAS BEEN AUTHORIZED BY THE ONTARIO SUPERIOR COURT OF JUSTICE
AND THE QUEBEC (COUR SUPÉRIEURE) SUPERIOR COURT.