

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
:   
In re ROYAL GROUP TECHNOLOGIES : Master File No. 06 Civ. 0822 (RJH)  
SECURITIES LITIGATION :  
:   
----- X

Court File No. 965/06

ONTARIO  
SUPERIOR COURT OF JUSTICE

B E T W E E N :

CANADIAN COMMERCIAL WORKERS INDUSTRY PENSION PLAN

Plaintiffs

- and -

ROYAL GROUP TECHNOLOGIES LTD., VIC DE ZEN,  
DOUGLAS DUNSMUIR, GARY BROWN, RON GOEGAN, DOMINIC D'AMICO,  
GREG SORBARA, RONALD SLAGHT and RALPH BREHN

Defendants

Proceeding under the *Class Proceedings Act, 1992*

**SUMMARY NOTICE OF PENDENCY AND CERTIFICATION OF CLASS ACTIONS,  
PROPOSED SETTLEMENT AND SETTLEMENT APPROVAL/FAIRNESS HEARINGS**

TO: ALL PERSONS WHO PURCHASED OR ACQUIRED ROYAL GROUP  
TECHNOLOGIES LIMITED SHARES BETWEEN FEBRUARY 28, 1998 AND  
OCTOBER 18, 2004, INCLUSIVE, OTHER THAN EXCLUDED PERSONS (the "Class").

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE  
AFFECTED BY A PROPOSED SETTLEMENT OF THESE LAWSUITS.

This Summary Notice relates to the following actions: *Canadian Commercial Workers Industry Pension Plan v. Royal Group Technologies, et al.*, Court File No. 965/06 (the "Canadian Action"), in the Ontario Superior Court of Justice (the "Canadian Court"); and *In re Royal Group Technologies Ltd. Securities Litigation*, Master File No. 06 Civ. 0822 (RJH) (the "U.S. Action" and, together with the Canadian Action, the "Actions"), in the United States District Court for the Southern District of New York (the "U.S. Court").

**PROPOSED SETTLEMENT**

The parties to the Actions have agreed to settle the Actions on behalf of the Class for C\$9,000,000 plus accrued interest (the "Settlement"). The Settlement will constitute a full and final resolution by Class members against the Defendants and others of all claims and causes of action

raised, or which could have been raised, in the Actions and encompassed in the Stipulation and Settlement Agreement dated as of March 30, 2007, as amended as of August 31, 2007 (the "Stipulation"). A copy of the Stipulation may be reviewed at [www.rgtsettlement.ca](http://www.rgtsettlement.ca) or obtained by mail from the Claims Administrator by writing to the addresses listed below.

For purposes of the Settlement only, the U.S. Court and the Canadian Court have respectively certified the U.S. Action and the Canadian Action as class actions on behalf of defined classes of shareholders. The Class described above represents the combined classes certified by the Courts for purposes of this Settlement only. Please note that there are persons specifically excluded from the Class. Those Excluded Persons are specifically identified in the Stipulation and the Notice of Pendency and Certification of Class Actions, Proposed Settlement and Settlement Approval/Fairness Hearings (the "Long Form Notice"), which you can obtain by following the instructions at the end of this notice.

### **NOTICE OF SETTLEMENT HEARINGS & MOTIONS FOR FEES**

The Settlement is contingent on approval of both of the Courts. The U.S. Court will hold a hearing on January 11, 2008 at 2:00 p.m. in Courtroom 17B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, before the Honorable Richard J. Holwell, United States District Judge. The Canadian Court will hold a hearing on December 17, 2007, at 10:00 a.m. in the Ontario Superior Court of Justice, 491 Steeles Avenue East, Milton, Ontario L9T 1Y7.

Each hearing will be for the purpose of determining: (1) whether the Settlement should be approved as fair, reasonable and adequate and in the best interests of Class members; (2) whether, thereafter, the Actions should be dismissed with prejudice against the Defendants; and (3) whether the proposed plan of allocation of net settlement proceeds is fair and reasonable and should be approved. Concurrently, Canadian and U.S. class counsel will apply to the respective Courts for awards of legal fees and reimbursement of expenses incurred in connection with the Actions. The Courts expressly reserve the right to adjourn the hearings from time to time without any further written notice to the Class.

Full instructions concerning your right to participate in the Settlement or to object to the approval of the Settlement and/or to the fees and expenses sought by class counsel are contained in Long Form Notice. Objections should be sent to counsel (and for members of the U.S. Class only, to the U.S. Court as well) in the manner described in the Long Form Notice, and must be post-marked no later than December 3, 2007 to be effective.

### **OPTING OUT**

If you are a member of the Class described above, your rights will be affected by the Settlement, if approved, and you will be bound by the terms of any Court order concerning the Actions, including releases of certain claims against the Defendants and others, unless you take steps to exclude yourself from the applicable class in the Canadian Action or the U.S. Action. If you wish to exclude yourself, you must make a request for exclusion in writing to the Claims Administrator, in

the manner described in the Long Form Notice. Requests for exclusion, to be effective, must be post-marked no later than December 3, 2007.

### **REQUIRED PROOF OF CLAIM TO SHARE IN SETTLEMENT**

In order to be eligible for distributions from the Settlement Fund, you must submit a Proof of Claim form to the Claims Administrator no later than January 31, 2008. If you do not return a signed and properly completed Proof of Claim form, you will not share in the Settlement money but you will still be bound by any judgment of the applicable Court. Proof of Claim forms may be obtained as described below.

### **FOR MORE INFORMATION**

This notice provides only a summary of matters concerning the Actions and the proposed Settlement. The Long-Form Notice and Proof of Claim, which have been mailed to Class Members, contain additional important information regarding the Settlement and related matters affecting Class members' rights. If you have not yet received these materials you may obtain copies free of charge by contacting Royal Group Technologies Ltd. Securities Litigation, c/o Crawford Class Action Services, Claims Administrator, at:

Canadian Address  
Suite 3 – 505 133, Weber Street North  
Waterloo, Ontario N2J

US Address  
2813 Wehrle Drive  
Williamsville, New York 14221

Website address: [www.rgtsettlement.ca](http://www.rgtsettlement.ca); e-mail address: [rgtadmin@crawco.ca](mailto:rgtadmin@crawco.ca); and toll-free 1-866-640-9997.

Inquiries, other than requests for the Long-Form Notice and Proof of Claim form, may be made to: *Canadian Class Counsel*: A. Dimitri Lascaris, Michael G. Robb, Siskinds LLP, 680 Waterloo Street, London, ON N6A 3V8, [www.siskinds.com](http://www.siskinds.com); *U.S. Class Counsel*: Samuel H. Rudman, Esq., Coughlin Stoia Geller Rudman & Robbins LLP, 58 South Service Road, Suite 200, Melville, NY 11747, (800) 449-4900, [www.csgr.com](http://www.csgr.com); David J. Goldsmith, Esq., Labaton Sucharow LLP, 140 Broadway, New York, NY 10005, (800) 321-0476, [www.labaton.com](http://www.labaton.com).

Employees of the Courts cannot answer questions about the Actions. Please direct all questions to the Claims Administrator or Canadian or U.S. Class Counsel.

DATED: October 16, 2007

BY ORDER OF THE ONTARIO COURT OF  
JUSTICE AND BY ORDER OF THE UNITED  
STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK