

# CANADIAN HEATING APPLIANCES CLASS ACTION NATIONAL SETTLEMENT AGREEMENT

## NOTICE DISSEMINATION PLAN

The Defendants Ouellet Canada Inc., Stelpro Design Inc., and Glen Dimplex Americas Ltd. (hereinafter the “**Manufacturers**”), and Thermon Group Holdings Inc., propose the following method of dissemination of the Notices and Settlement Notices through conventional print and digital social media to the Class Members, and Settlement Class Members regarding the :

- Settlement Approval Motion;
- Approval Judgment;

hereinafter the (“**Notice Programs**”), and the procedures to object, or opt-out or file a Claim as a Settlement Class Member.

The Manufacturers will implement the Notice Programs to disseminate the Notices to the Class Members, and the Settlement Notices to the Settlement Class Members, and receive the Claim Forms. The Class Counsel will receive the opt-out written election.

### CLASS ACTION NOTICE PROGRAMS

Due to the nature and size of the class and settlement, a cost-effective, print, digital and social media strategy (Facebook, Instagram, Audience Network) will be employed for both Notice Programs.

The Notice Programs will consist of the following Notices and Settlement Notices:

- Short Form General Approval Notice (Settlement Approval Motion);
- Detailed General Approval Notice (Settlement Approval Motion);
- Short Form Settlement Notice (Approval Judgment);
- Long Form Settlement Notice (Approval Judgment);

The Notices and Settlement Notices will be written in both English and French to inform the Class Members and Settlement Class Members of the Approval Hearing, opt-out deadline, the Settlement, Approval Judgment and Claim process as agreed to by the Parties and approved by the Court.

All Notices and Settlement Notices will include a toll-free number, email addresses, and website addresses for the opt-out and Claim Administration.

### The Manufacturers will execute two separate Notice Programs

1. **To provide Class Members adequate Notice of the pending settlement and provide Class Members the options in regards to objecting or opting-out of the Settlement:**  
The Opt-Out Deadline is 45 days after the Notice is published and any opt-out written election shall be delivered to the Class Counsel within the Opt-Out Deadline.

- 2. To notify Settlement Class Members once the Settlement has been finalized and to file a Claim Form:** The objective of this Notice Program is to provide adequate notice of the Settlement and provide important information to Settlement Class Members, including the Claims Administration process. Settlement Class Members will be notified of the existence and terms of the settlement benefits through the Settlement Notice approved by the Court.

To effect the Notice Programs, the Manufacturers shall:

1. Establish, maintain, and monitor a dedicated e-mail address to which Class Members and Settlement Class Members may direct written inquiries;
2. Format the Notice and Settlement Notice to facilitate electronic versions of the notices for digital means;
3. Establish a web site address which will contain the Short Form General Approval Notice, Detailed General Approval Notice, Short Form Settlement Notice, and Long Form Settlement Notice, as well as necessary forms, information on hearing dates, deadlines, and contact information for Class counsel;
4. Publish the Short Form General Approval Notice, and Short Form Settlement Notice, in the following newspapers through placing one advertisement in each publication on a weekday:
  - a. The National Post (in English);
  - b. Montreal Gazette (in English);
  - c. Journal de Québec (in French);
  - d. The Globe and Mail (national edition) (in English);
  - e. The Vancouver Sun (in English);
  - f. Edmonton Journal;
  - g. Calgary Herald;
  - h. Ottawa Citizen;
  - i. Windsor Star;
  - j. Saskatoon Star Phoenix;
  - k. Regina Leader Post;
  - l. London Free Press;
  - m. Journal de Montreal (in French);
  - n. The Toronto Star (in English); and
  - o. La Presse + (in French)
5. Disseminate information on social media (Facebook, Instagram, Audience Network) for a minimum duration of 30 days with a campaign targeting minimally 10,000 clicks.