

SCHEDULE “E”

PRE-APPROVAL NOTICE (LONG-FORM)

NOTICE OF AUTHORIZATION OF A CLASS ACTION AND OF THE PROPOSED CANADIAN SETTLEMENT OF THE SILK AND GREAT VALUE PLANT-BASED PRODUCTS LITIGATION

A Canada-wide settlement has been reached in a class action relating to Silk Products and Great Value Products (the “**Canadian Settlement**”). On July 18, 2024, an Application to Authorize the Bringing of a Class Action was filed in the judicial district of Montreal, in the case *Romano v. Danone Inc. et al.*, Court File No. 500-06-001321-245 (the “**Quebec Proceeding**” or the “**Class Action**”). The Class Action was authorized by the Superior Court of Quebec for settlement purposes on **November 17, 2025**, against Danone Inc. (“**Danone Canada**”), Wal-Mart Canada Corp., Joriki Inc. and Intact Insurance Company (the “**Defendants**”).

The Class Action raised various allegations against the Defendants and sought damages on behalf of residents of Canada for symptoms and health issues allegedly related to the purchase and/or ingestion of Silk Products and Great Value Products and for the alleged negligent management of the Recall initiated on July 8, 2024. The Defendants deny the allegations made in the Class Action, make no admission as to the truth of these allegations, and deny any wrongdoing.

This Notice advises you of the hearing that will be held to decide whether the Settlement Agreement should be approved. You may attend the Settlement Approval Hearing, but are not required to do so. You may review the relevant documents related to the Class Action, including the Canadian Settlement Agreement at the settlement website: www.PlantBeverages-Settlement.com.

On July 22, 2024, – i.e. after the Quebec Proceeding was filed – a similar class action proceeding was commenced in the Supreme Court of British Columbia by plaintiffs Brandon Gabriel and Melinda Bige, in Court File No. VLC-S-S-244861, against Danone Canada and Wal-Mart Canada Corp. (the “**BC Proceeding**”). The BC Proceeding is contested by Danone Canada and Wal-Mart Canada Corp., has not been certified and no settlement has been reached.

WHO IS INCLUDED IN THE CLASS ACTION?

The class authorized by the Court is the following (the “**Class**”):

All persons in Canada who purchased or ingested the Silk Products or Great Value Products subject to the Recall initiated by Danone Canada on July 8, 2024, including those who have suffered any Personal Injury as a result thereof, and their successors, assigns, family members, and dependants.

Under the Settlement Agreement, “Personal Injury” means any physical and/or psychological harm.

WHAT IS THE PROPOSED SETTLEMENT?

The Canadian Settlement provides for the payment of \$6,500,000.00 CAD into a Settlement Fund, which will be used to pay compensation for Approved Claims, Provincial Health Insurer Claims, Class Counsel Fees and Disbursements, Administration Expenses, and any applicable taxes, interest and costs. Class Counsel will seek Court approval of its fees in the amount of 30% of the Settlement Fund (\$1,950,000.00 CAD plus taxes) and their disbursements. The Canadian Settlement is not contingent on the approval of Class Counsel Fees and Disbursements.

Additionally, under the Canadian Settlement, Class Members will be entitled to benefit from the Voluntary Refund Program implemented by Danone Canada for Silk Products and Great Value Products, which Danone Canada undertakes to maintain in place until the last day of the Claim Period.

The Canadian Settlement also provides that the parties will seek an order from the Supreme Court of British Columbia dismissing, striking, permanently staying or approving the discontinuance of the BC Proceeding, which the Canadian Settlement is contingent upon.

If the Court approves the Canadian Settlement, payments to approved Claimants will be made to Class Members who meet the criteria described below within the specified timeframes. Net settlement proceeds will be allocated among the Approved Claims based on the category of Illnesses they belong to described in the Compensation Grid (Schedule A to the Settlement, available at: www.PlantBeverages-Settlement.com).

If you are a member of the Class as described above, you may be eligible for compensation if, on or before the expiry of the Claim Period, which will be posted on the Settlement Website, you submit a Claim Package to the Claims Administrator with related medical, pharmaceutical, and other records, if applicable. You (or your legal or estate representative) or a Family Claimant must satisfy the Claims Administrator that:

- (a) the Claim relates to a Primary Claimant who has ingested a Product in Canada;
- (b) the Primary Claimant experienced an Illness;
- (c) the Primary Claimant ingested a Product contemporaneous with their Illness, as required in the Compensation Grid; and
- (d) the Primary Claimant did not already receive compensation from Danone Canada for having experienced an Illness following the ingestion of a Product.

Supporting documentation to establish the ingestion of a Product and the experience of an Illness necessary for compensation eligibility is outlined in the Compensation Grid.

To be eligible for compensation as a family member of a Primary Claimant, evidence must be provided of the relationship. A comprehensive list of eligible **Family Claimants** is located at www.PlantBeverages-Settlement.com.

The Claims Administrator is responsible for determining the eligibility of Claimants pursuant to the conditions provided in the Settlement Agreement and for calculating each proposed Compensatory Payment to be made to Claimants with Approved Claims based on the category of Illnesses they belong to described in the Compensation Grid, subject to the *pro rata* increase or reduction outlined in Section 4.7 of the Canadian Settlement.

OPTING-OUT

If you are a member of the Class and wish to participate in the Canadian Settlement, **no action is required at this time.**

If you are a member of the Class and do **not** wish to participate in the Canadian Settlement, then you must opt-out of this Class Action by **December 22, 2025**. The Opt-Out Form is available at www.PlantBeverages-Settlement.com, and must be sent to either Class Counsel (via email to jzukran@lpclex.com), the Claims Administrator (contact information below), or by postal mail to the Clerk of the Superior Court of Quebec, District of Montréal, at 1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6.

Members of the Class who do not opt-out shall be deemed to have elected to participate in the Class Action and will be bound by the Canadian Settlement and the releases in it and will be entitled to share in any of the benefits that may become available to them as Class Members, provided that they proceed within the timeframes provided for in the Canadian Settlement to make their claims. No further right to opt-out of the Class Action will be provided in the future.

Class Members who opt-out will **not** be bound by the Canadian Settlement or the releases in the Canadian Settlement, but will also **not be entitled to share in the distribution of any funds** that may become available to Class Members as a result of the Settlement.

If you opt out from the Canadian Settlement, you may be eligible to participate in the BC Proceeding, provided that the BC Proceeding is not dismissed, struck, permanently stayed or discontinued. If you do not opt out of the Canadian Settlement and it is not terminated, the Defendants will argue to the Supreme Court of British Columbia that you are bound to the Canadian Settlement and not eligible to participate in the BC Proceeding.

SETTLEMENT APPROVAL HEARING

In order for the Canadian Settlement to become effective:

- (a) it must be approved by the Superior Court of Quebec, which must be satisfied that the Canadian Settlement is fair, reasonable, and in the best interest of the Class Members. The Settlement Approval Hearing is scheduled for **January 26, 2026, at 9:30 a.m.**, in room 2.08 of the Montreal Courthouse (and virtually via a TEAMS link that will be posted on the Settlement Website; and
- (b) the BC Proceeding must be dismissed, struck or permanently stayed by the Supreme Court of British Columbia, or discontinued.

No further notice shall be published if the Settlement Approval Hearing is adjourned, other than the information to be posted on the Settlement Website: www.PlantBeverages-Settlement.com.

If the Canadian Settlement is not approved by the Court, the Settlement shall terminate, and its terms shall no longer be binding on Class Members. In that case, all parties shall be restored to their pre-Settlement positions.

OBJECTING TO OR COMMENTING ON THE PROPOSED SETTLEMENT

If you wish to object to or comment on the proposed Canadian Settlement, including any of its terms and conditions, you must submit your written objection or comment to Class Counsel or the Claims Administrator by **December 22, 2025**. Your objection or comment will be filed in the Court record and must include the information below:

- (a) Your full name, current mailing address, telephone number, and email address;
- (b) A brief statement of your reasons for the objection or your comment;
- (c) A declaration that you believe you are a member of the Class and the reason for that belief; and
- (d) A statement about whether you intend to appear at the Settlement Approval Hearing and, if so, if you intend to appear by counsel and, if by counsel, the name and contact information of your legal counsel.

As a Class Member, you have the right to intervene in the present Class Action, in the manner provided for by law. No Class Member other than the representative plaintiff or an intervenor may be required to pay legal costs arising from the Class Action.

NOTICE OF SETTLEMENT APPROVAL

If the Court approves the proposed Canadian Settlement, a subsequent notice of approval will be published containing important deadlines for Class Members to submit their claims for compensation. Please monitor the Settlement Website for updates.

THE LAWYERS REPRESENTING THE CLASS ARE:

LPC Avocats

Mtre Joey Zukran / Mtre Léa Bruyère
276 Saint-Jacques Street, Suite 801
Montreal, Quebec, H2Y 1N3
Phone: 514-379-1572
Email: jzukran@lpclex.com / lbruyere@lpclex.com

THE COURT-APPOINTED CLAIMS ADMINISTRATOR IS:

Concilia Services Inc.

5900 Andover Avenue, Suite 1
Montreal, Quebec, H4T 1H5
Phone: 1-888-367-7705
Email: PlantBeverages@conciliainc.com
Settlement Website: www.PlantBeverages-Settlement.com

For more information on the status of the Settlement Approval Hearing or on how to opt out of, comment on, or object to the Canadian Settlement, or to view the Settlement Agreement or the Quebec Proceeding, visit www.PlantBeverages-Settlement.com which will be periodically updated with information on the settlement approval process and the Quebec Proceeding.

You should consult the Settlement Agreement at the settlement website (www.PlantBeverages-Settlement.com) or contact Class Counsel or **Concilia Services Inc.** by phone or email for specific details as to your rights and obligations under the Settlement Agreement.

The publication of this notice to Class Members has been approved and ordered by the Superior Court of Quebec.