

SCHEDULE A – APPENDIX 1

NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL HEARING

RCMP Gender and Sexual Orientation Based Harassment and Discrimination Class Action

If you are a female or identified as a female and work or volunteer with the RCMP now or did so in the past, this notice may affect your legal rights. Please read it carefully.

A class action lawsuit was initiated alleging gender or sexual orientation based harassment and discrimination within the RCMP. The Defendant, while not admitting liability, has agreed to a settlement of this lawsuit. A Federal Court class action has been certified on consent for the purpose of settlement.

Who is Eligible for the Proposed Settlement?

To be eligible to participate in the settlement, you must be a member of the class and have experienced gender or sexual orientation based harassment or discrimination while working or volunteering with the RCMP. The class is defined as:

Primary Class Members: current and former living Municipal Employees, Regional District Employees, employees of non-profit organizations, volunteers, Commissionaires, Supernumerary Special Constables, consultants, contractors, public service employees, students, members of integrated policing units and persons from outside agencies and police forces who are female or publicly identify as female and who were supervised or managed by the RCMP or who worked in an RCMP controlled workplace during the Class Period, excluding individuals who are primary class members in *Merlo and Davidson v. Her Majesty the Queen*, Federal Court Action Number T-1685-16 and class members in *Ross, Roy, and Satalic v. Her Majesty the Queen*, Federal Court Action Number T-370-17 or *Association des membres de la police montée du Québec inc., Gaétan Delisle, Dupuis, Paul, Lachance, Marc v. HMTQ*, Quebec Superior Court Number 500-06-000820-163. The Class Period runs from September 16, 1974 to {date of certification order}.

Secondary Class Members: any Child or Spouse of a Primary Class Member who has a derivative claim, in accordance with applicable family law legislation.

If you *do not* wish to participate in the class action because you wish to retain the right to pursue an individual action, you must deliver a signed Opt-Out Form to Class Counsel received or postmarked no later than *****, 2019. If you do not exclude yourself by that date, you will be included in this lawsuit and will be bound by the Court's judgement on the settlement.

You only need to file an Opt-Out Form if you wish to retain the right to pursue an individual action.

The Opt-Out Form can be obtained from Class Counsel at the address below. It is also available on Class Counsel's websites and on the website of the Administrator.

If you have an ongoing lawsuit or other claim for compensation with respect to gender or sexual orientation based harassment or discrimination you experienced while working or volunteering with the RCMP, and you wish to participate in the proposed class action settlement, you must discontinue your lawsuit or other claim before ****, 2019. If you do not, you will be deemed by s. 334.21(2) of the *Federal Courts Rules*, S.O.R./98-106 to have opted out of the class action. Please contact your lawyer to discuss your options.

The Terms of the Proposed Settlement

The settlement provides six levels of compensation for Primary Class Members who experienced gender or sexual orientation based harassment or discrimination while working or volunteering with the RCMP during the Class Period. Compensation is available for Secondary Class Members where the Primary Class Member's Claim is assessed at either of the two highest severity levels.

You can obtain a copy of the settlement agreement and the applicable schedules by contacting Class Counsel or the Administrator at the addresses below. These documents are also available on the websites of Class Counsel and the Administrator.

The Approval Hearing and Your Right to Participate

A motion to approve the settlement is scheduled to be heard on **, 2019 at 10 am at the Federal Court, ***. Class Counsel will also ask the Court to approve an award of fees and disbursements for their work in achieving the settlement.

If you agree with the proposed settlement, you do not have to do anything at this time. If the Court approves the settlement, a notice will be published setting out the procedures for submitting a Claim.

If you disagree with the proposed settlement, you have the right to object. You may do so by delivering a letter to Class Counsel by *****, 2019, which Class Counsel will then provide to the Court. In your letter, you should provide your name, contact information, and a brief statement of the nature and reasons for your objection.

What are the Financial Consequences?

If the settlement is approved by the Court and you have not opted out of the class action prior to the opt-out deadline, you will be bound by the terms of the settlement.

The defendants have agreed to pay Class Counsel's disbursements and are making a contribution toward class counsel fees. Class Counsel will request a further class counsel fee of 15% plus applicable sales tax payable from the compensation awarded to class members under the settlement. The award of class counsel fees is subject to court approval. If approved, 15% of the

compensation awarded to Class Members will be deducted from payments to Class Members and paid to Class Counsel as a contribution toward class counsel fees.

For More Information

For more information about the settlement, contact Class Counsel at:

Klein Lawyers LLP
Whitney Santos
1385 West 8th Avenue, #400
Vancouver, BC
V6H 3V9
www.callkleinlawyers.com

Higgerty Law
Syrrah Deckert
Millennium Tower, Main Floor
101, 440 2nd Avenue SW
Calgary, AB
T2P 5E9
www.higgertylaw.ca

The Administrator's website is *****