SCHEDULE A

PRE-APPROVAL NOTICE

CROSIÈRES AML INC. CLASS ACTION PRE-APPROVAL NOTICE OF SETTLEMENT APPROVAL HEARING

A proposed settlement ("**Settlement**") has been reached in a putative class action relating to certain prices advertised to consumers on Croisières AML inc.'s ("**AML**") online platforms, during the period since November 29, 2018. This proposed Settlement is subject to Court approval.

WHAT IS THIS CASE ABOUT?

The plaintiff alleges that certain prices advertised to consumers on AML's website www.croisieresaml.com did not include certain fees, and therefore violated sections 219, 224 c) and 228 of the Consumer Protection Act, CQLR c P-40.1. AML denies any fault or error in its pricing practices and denies all liability. A trial was to be held at a later date to allow the parties to make their submissions.

AM I A MEMBER OF THE SETTLEMENT CLASS?

You may be a Settlement Class Member if you made a transaction on the <u>www.croisieresaml.com</u> website and you paid a Reservation Fee and/or a Tip fee since November 29th, 2018

WHAT DOES THIS SETTLEMENT PROVIDE?

Under the Settlement, a credit in the amount of \$3.00 will be awarded to Eligible Class Members for each qualifying transaction made on the www.croisieresaml.com website. The total credit will be issued in the form of a Unique Code and will be valid and applicable for only one (1) purchase on the AML platform, provided that the Eligible Class Member pays the balance of the purchase price and all applicable fees and taxes in accordance with AML's terms and conditions and complying with all other provisions thereof. The Unique Code will be emailed to each Eligible Class Member and will not have an expiration date.

AML will also pay class counsel fees, administration fees and expenses, and any fees required to administer the Settlement.

WHAT ARE MY OPTIONS?

If you are an Eligible Class Member, you may (1) object to or comment on the Settlement; (2) opt out of the Class Action; or (3) do nothing.

If you do not wish to be legally bound by the class action, you must "opt out" of the class action. To do so, you must complete and submit an Opt-Out Form and provide it to Plaintiffs' Counsel by May 3rd, 2023, using the form on the class action website if you wish. If you do nothing, you will remain an Eligible Class Member and will be bound by the Settlement, once authorized by the Court.

If you remain in the class action, you may object to the Settlement or comment on it by submitting a written objection to the Court no later than May 11th, 2023.

WHEN AND WHERE WILL THE COURT DECIDE IF THE SETTLEMENT IS APPROVED?

The Superior Court of Quebec must be satisfied that the Settlement is fair, reasonable and in the best interests of Settlement Class Members.

The Settlement Approval Hearing aiming to ascertain the foregoing will take place on May 16, 2023 at 2:30 pm in room 15.08 at the Montreal Courthouse located at 1 Notre-Dame St. East, Montreal, Quebec.

You do not have to attend the hearing but you may do so if you wish. If you have submitted a written Objection to the Court, you (or your lawyer) may present arguments with regards to the proposed Settlement.

WHAT ARE THE EFFECTS OF STAYING IN THE CLASS ACTION?

Unless you exclude yourself from the Class Action (Opt-Out), you cannot sue AML or be part of any other lawsuit against AML concerning the issues this Settlement seeks to resolve. Unless you exclude yourself from the Class Action (Opt-Out), all of the decisions rendered by the Court will bind you. If the proposed Settlement is approved by the Court, all Settlement Class Members who have not opted out will be "releasing" AML and all related people as described in the Settlement.

The Settlement describes the released claims with specific descriptions, so read it carefully. If you have any questions, you can talk to the Class Counsel law firm for free, or you, of course, to your own lawyer (at your own expense).

HOW CAN I EXCLUDE MYSELF FROM THE CLASS ACTION? (OPT-OUT)

If you want to keep the right to sue or continue to sue AML based on claims this proposed Settlement seeks to resolve, you must take the following steps to opt out of the Class Action.

To exclude yourself from the Class Action (Opt-Out), you must inform the Court Clerk by completing the Opt-Out Form (available on the Settlement Website at www.lambertavocats.ca/en/class-action-aml/ and sending it by registered mail to the following address:

Superior Court of Quebec, Class Action Division Montreal Courthouse Phanor v. AML (500-06001172-218) 1 Notre-Dame Street East, Montreal, Quebec H2Y 1B6

With additional copy sent by mail or email to the Administrator at the following address:

Croisières AML inc. – Action collective 124 rue Saint-Pierre, Québec (Québec) G1K4A7

You cannot exclude yourself by telephone or by email.

You cannot exclude yourself by mailing a request to any other location or after the deadline.

You cannot exclude yourself if you intend to object to or comment on the Settlement.

Your Opt-Out Form must be signed by you, personally, and not your lawyer or anyone else acting on your behalf.

IF I DO NOT EXCLUDE MYSELF, CAN I SUE AML FOR THE SAME THING LATER?

No. Unless you exclude yourself, you give up the right to sue AML for the claims that this Settlement seeks to resolve.

IF I EXCLUDE MYSELF, DO I STILL GET A PAYMENT?

No. You will not get a payment if you exclude yourself from the Class Action and the proposed Settlement is ultimately approved by the Court.

DO I HAVE A LAWYER IN THIS CASE?

Yes. The attorneys representing the Settlement Class Members are the law firm of Lambert Avocats (Class Counsel). You will not be charged by this law firm for its work on the case. If you want to be represented by your own lawyer, you may hire one at your own expense.

HOW WILL CLASS COUNSEL BE COMPENSATED?

As part of the settlement of this case, AML has agreed to pay Class Counsel Fees in the amount of CAD \$100,000, plus applicable taxes, subject to the Court's approval, for their fees and costs.

This payment will not reduce the benefits provided to the Settlement Class Members. You will therefore not be paying for any portion of the Class Counsel Fees.

CAN I OBJECT WITH TO THE PROPOSED SETTLEMENT?

Yes. If you do not agree with the Settlement, you may object or comment on the Settlement by submitting your objection on or before May 11th, 2023. You may not file an objection to the settlement if you opt out of the Class Action. You may also attend the Approval Hearing to be held on May 16th, 2023 to present your objection to the Court.

Your objection must be sent to Plaintiffs' Counsel by letter, email or fax, and include all of the following information:

- a. a heading indicating the name and case number of this proceeding (Phanor v. AML 500-06-001189-220)
- b. your full name, address, telephone number and email address, and if you are represented by counsel, the name, address, telephone number, fax number and email address of your counsel
- c. a statement as to whether you intend to appear at the settlement approval hearing, either in person or through counsel
- d. a statement that you are a member of the Settlement Class
- e. a statement of your objection and the reasons supporting your objection or comment
- f. A copy of all documents on which your objection is based;
- g. a statement under penalty of perjury that the above information is true and accurate; and
- h. your signature.

Do NOT send your objection directly to the Court. Counsel for the plaintiff will be responsible for sending a copy of all objections to the Court.

HOW DO I GET MORE INFORMATION?

The Settlement and more detailed information, including relevant judgments, are available on the Settlement website at https://lambertavocats.ca/en/class-action-aml/.

WHO REPRESENTS THE SETTLEMENT CLASS MEMBERS?

LAMBERT AVOCATS

1111 Saint Urbain Street, Suite 204 Montreal, Quebec, H2Z 1Y6 www.lambertavocats.ca

Please note that this Long Form Pre-Approval Notice, the Short Form Pre-Approval Notice, and a potential Final Approval Notice, will be the only notices that the Class Members will receive in regard to this Settlement. In case of any discrepancy between the terms of this Notice and the

Settlement, the terms of the Settlement shall prevail. Any term not defined in this Settlement Approval Notice shall have the meaning ascribed in the Settlement.

This Notice has been approved by the Superior Court of Quebec.