

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

SUPERIOR COURT
(Class Action Division)

File No.: 500-06-000797-163

DAN ABICIDAN

Plaintiff

v.

IKEA CANADA LIMITED PARTNERSHIP
and
1137446 ONTARIO INC.
and
IKEA LIMITED
and
IKEA PROPERTIES LIMITED
and
INTER IKEA SYSTEMS B.V.

Defendants

NOTICE OF DISSEMINATION PLAN AND COMPENSATION PROTOCOL
SCHEDULE "A"

1. PREAMBLE

A. WHEREAS, on June 28, 2016, Plaintiff Dan Abicidan filed an Application to Authorize the Bringing of a Class Action and to Appoint the Status of Representative Plaintiff (the "**Application for Authorization**").

B. WHEREAS, on October 24, 2019 the Parties informed the Court that they had reached an Agreement in principle to settle the present file.

C. WHEREAS, pursuant to the Settlement Agreement, IKEA must undertake certain steps and provide Compensation to the Class Members as more fully detailed herein.

D. WHEREAS, all capitalized terms contained herein have the meanings ascribed to them in the Settlement Agreement, Transaction and Release.

E. WHEREAS, the Preamble forms an integral part of this Compensation Protocol.

2. PUBLICATION OF NOTICE AND CLAIMS FORM

2.1 This Compensation Protocol will only become effective once it is approved by the Superior Court of Quebec. If it is not approved, it will become null and void and will not generate any rights or obligations either for the Parties or the Class Members.

2.2 Email Notice

2.3 The Claims Administrator will send a bilingual (French and English) Email Notice (Short Notice - Schedule B.2) to all 381,442 (approx.) IKEA Family members for whom IKEA has a facially valid email address in its product registration records. The Email Notice will be created using an embedded html text format. This format will provide easy-to-read text without graphics, tables, images and other elements that would increase the likelihood that the message could be blocked by Internet Service Providers (ISPs) and/or SPAM filters. Each Email Notice will be transmitted with a unique message identifier.

2.4 The Email Notice will include an embedded link to the Settlement Website. By clicking the link, recipients will be able to easily access a more detailed Notice, the Settlement Agreement, the compensation options and other information about the Settlement.

2.5 Class Counsel will send the same bilingual (French and English) Email Notice (Short Notice – Schedule B.2) to all individuals who signed up to Class Counsel’s website (www.lpclex.com/ikea) regarding this Litigation as of the date of signing of the Agreement. All written communications between Class Counsel and Class Members are deemed confidential.

2.6 Notices

2.7 A Short Form Notice (Schedule B.2) will be published in the Journal de Montreal and the Journal de Quebec, in French, and The Gazette, in English, size 2 X 75 (1/8 page). Class Counsel can grant unsolicited media interviews, the purpose of which is to promote the benefits of the Settlement and remain consistent with the

message contained in the Notices. The Plaintiff and Class Counsel shall not engage in any conduct or make any statement, directly or indirectly, that the settlement of claims contemplated by the settlement constitutes an admission of liability or an admission of the validity or accuracy of any of the allegations in the Class Action against IKEA.

2.8 Settlement Website and Toll-free Telephone Number

2.9 A dedicated bilingual (French and English) website will be used for the Settlement with easy-to remember domain names in French and English. Settlement Class Members will be able to obtain detailed information about the case and review key documents, including the Claim Form, the Notices, the Settlement Agreement, the Compensation Protocol, the Application for Authorization, and the Approval Order, as well as answers to frequently asked questions (FAQs). The Settlement Website addresses will be displayed on all Notice documents.

2.10 The Settlement Website will provide information for Settlement Class Members in both English and French.

3. THE CLAIM FORM

3.1 There will be one (1) Claim Form for the Pickup Service only which can be completed and submitted online from the Settlement Website, the whole substantially in the form of Schedule C to the Settlement Agreement, as approved by the Court.

3.2 For a claim to be eligible for the Pickup service, the Claimant must confirm or provide their current contact information and attest that the Claimant purchased a Chests of Drawers.

3.3 Claimant must also provide a proof of purchase through a document (electronic or otherwise) provided that it indicates: (1) the name of the Claimant or the address of the Claimant; (2) the location of the store in Quebec at which they purchased their Chests of Drawers; (3) the amount paid. This proof may be in the form of a receipt or bank statement screenshot, for instance.

3.4 The Claims Administrator will retain its right to reject the Pickup Service if an inquiry determines that the amount in the document was used to purchase items other than a Chest of Drawers.

3.5 There is a limit of six (6) Chests of Drawers by Pickup and one (1) Pickup per residence.

3.6 The Parties agree that, with a view of discouraging fraudulent claims, a refund to any person who already received a refund in the past will be refused.

4. DETERMINATION OF CLASS MEMBER COMPENSATION (DISTRIBUTION PROTOCOL)

4.1 After determining if the claim is eligible for Compensation, the Claims Administrator will provide Recall Benefits and the Pickup Service.

4.1.1 If a Class Member submits an incomplete Claim Form, the Claims Administrator will give Class Counsel the opportunity to try to contact the Class Member to complete it. If the Class Member does not complete it within 30 days, the Claims Administrator will reject it.

4.1.2 If the Claims Administrator determines that a Claim meets the requirements for Compensation, it shall send the Class Member a full refund card by mail which can be presented in an IKEA store for conversion to the original method payment (i.e. the refund card can be converted in cash or transferred to a credit card) or issue a refund to a credit card initiated over the phone and completed through a secure portal. A refund card can also be used at any IKEA store in Canada ("**Refund Card**"). The Claims Administrator shall begin to schedule the Pickup for valid claimants commencing after the Effective Date, or sooner upon Defence Counsel's and Class Counsel's joint direction, but not before the issuance of the Court's Approval Judgment.

4.1.3 As soon as practicable after all payments to Claimants have been made, the Claims Administrator shall submit the Claims Administrator's Final

Accounting Report to Class Counsel and Defence Counsel specifically detailing all monies that have been paid by IKEA to Class Members. This will be provided to the Court.