

Detailed Notice to Potential Class Members that has been mailed to potential Class Members but is also posted here for general information:

LEGAL NOTICE

Pour obtenir de l'information concernant le recours collectif, veuillez consulter la documentation française située à www.cavalluzzo.com/enbridge-pension-plan-class-action.

Did you take a maternity, pregnancy or parental leave while working for Enbridge Gas Inc. (as early as 1990) or Enbridge Inc. (as early as 1988)?

You might be entitled to a payment as part of a class action settlement. Please read this notice carefully.

Dear _____,

Notice of Class Action Settlement

A settlement agreement was recently reached in the Enbridge Class Action, as explained below. You are receiving this letter because we believe you might be one of the limited number of persons entitled to a payment under this settlement.

Please read this notice carefully for details of the proposed Settlement.

The Ontario Superior Court authorized this notice. This is not a solicitation from a lawyer.

Proposed Settlement of the Enbridge Class Action

A former Enbridge employee, Sue Williams, (the “Representative Plaintiff”), sued Enbridge on behalf of Enbridge employees who took a maternity, pregnancy and/or parental leave (“Statutory Leave”) while working at Enbridge companies as early as 1988 or 1990 depending on the Enbridge entity (“Affected Period”) (the “Class Members”). The class action lawsuit claimed that Enbridge failed to properly administer the paperwork for Statutory Leaves during the Affected Period.

Enbridge has denied all of these allegations. The Court has not made any decision on the merits of those allegations in this Class Action.

Instead, Ms Williams and Enbridge have reached a proposed settlement, which is subject to approval by the Court. Under the terms of that proposed settlement, a smaller group of the Class Members will receive a payment. However, in order to finalize the settlement and begin the claims process, a judge of the Superior Court of Justice in Toronto must first approve this proposed agreement.

The Court’s approval hearing will be held on May 28, 2026. On that day, the Representative Plaintiff will present evidence and argue that the proposed settlement is fair and reasonable. If you are a Class Member, your rights will be affected by this settlement.

For more information, please see below.

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A. BASIC INFORMATION

1. Why did I get this notice?

The Ontario Superior Court of Justice authorized this notice to let you know about a proposed settlement.

This notice explains the lawsuit, the proposed settlement, and your legal rights.

2. What is a class action?

In a class action, one or more people called the “representative plaintiff(s)” sue on behalf of people who have similar claims, called the “class” or “class members”.

In a class action, the court can resolve all or some of the class members’ claims at the same time. People who meet the definition of a "class member" are automatically included in the claim, unless they choose to “opt out”. Opting out is explained in more detail below.

3. What is this class action about?

Sue Williams (the “Representative Plaintiff”) commenced the lawsuit and is represented by Cavalluzzo LLP (“Class Counsel”). Enbridge is defending the case and is represented by McCarthy Tetrault LLP (“Defence Counsel”).

The lawsuit alleges that: Enbridge failed to properly administer the paperwork for Statutory Leaves during the Affected Period. As a result, some employees who took Statutory Leaves during the Affected Period have less service in the Enbridge Pension Plans.

Enbridge has denied all of these allegations.

4. Has there been a trial?

This case has not yet gone to trial. The Court has not made any decision on the merits of those allegations in this Class Action. Instead, Ms Williams and Enbridge have reached a proposed settlement, which is subject to approval by the Court.

5. Why is there a proposed settlement?

The Representative Plaintiff and Enbridge have agreed to the proposed settlement.

By agreeing to the proposed settlement, the parties avoid the costs and delay and uncertain outcome of a trial. It also means that the Class Members will not need to testify in Court.

The Representative Plaintiff and Class Counsel think the proposed settlement is in the best interests of all Class Members.

B. WHO IS INCLUDED IN THE PROPOSED SETTLEMENT?

6. *Who is included in the proposed settlement?*

The Class Members included in the proposed settlement are:

- a) All persons who are or were members of one or both Enbridge Pension Plans; *and*
- b) who did not accrue Credited Service in the Enbridge Pension Plans during a Statutory Leave during the Affected Period; *and*
- c) who, as of the date of certification of this Class Action, are
 - a. Salaried Employees; or,
 - b. former employees of Enbridge, whether Salaried Employees or not; or,
 - c. members of a Union who, during a Statutory Leave during the Affected Period, were Salaried Employees (the “Class Members”).

You are a Class Member if you meet this definition. Pursuant to the terms of the proposed settlement, a smaller group of Class Members (or their Estates) – the “Settlement Class Members” – will be eligible for a payment.

In the case of Estates of Settlement Class Members, a claim must be filed by the Estate Executor.

If you are a Class Member, your rights will be affected by this settlement. You have three choices: you can choose to do nothing, in which case you will be bound by the outcome of the hearing for approval of the settlement; in the alternative, you have the right to support or to object to the proposed compensation plan and be bound by the outcome of the hearing for approval of the settlement; or in the further alternative, you have the right to instead refuse to participate in the settlement (that is, to “opt out of” the Class Action).

If the settlement is approved, all Class Members, except those who validly opt out of the settlement, will be bound by the proposed settlement and will be covered by the releases in the proposed settlement.

8. *What if I am not sure whether I am included in the proposed settlement?*

If you are not sure whether you are a Class Member or a Settlement Class Member, you may call 1-877-252-9168 or visit www.cavalluzzo.com/enbridge-pension-plan-class-action.

C. PROPOSED SETTLEMENT

8. What does the proposed settlement provide?

If approved, the settlement provides that certain Class Members – the Settlement Class Members – are eligible for compensation.

The proposed settlement provides for 223 persons to claim amounts which together add up to approximately \$826,836 (the “Settlement Sum”). Some of the Settlement Sum will be paid to Cavalluzzo LLP in legal fees, HST and disbursements. The net amount will be distributed based on a calculated portion of the value of Settlement Class Members’ missed Credited Service accrual (“Missed Service”) in relation to Statutory Leaves.

The value of Settlement Class Members’ Missed Service will depend on the length of their Statutory Leave, their compensation at the time of the Statutory Leave and other factors under the Enbridge Pension Plans. Each Class Member’s amount is different because each Class Member’s situation is different.

A full copy of the proposed settlement (called a Settlement Term Sheet) is available for your review at: <https://www.cavalluzzo.com/enbridgeclassaction>. It sets out the approach that will be taken to each Class Member's claim.

9. What am I giving up in the proposed settlement?

Once the proposed settlement becomes final, if you are a Class Member you will have given up your right to sue Enbridge for the claims outlined in the Amended Amended Statement of Claim (“Claim”) that got this case started. In other words, you will be “releasing” Enbridge from liability for the claims set out by this Class Action. This means you cannot sue Enbridge for anything in respect of pay for alleged Missed Service for Statutory Leaves in the Affected Period (which starts at either 1988 or 1990 depending on the Enbridge entity).

The proposed Settlement Term Sheet describes the released claims with specific descriptions, so please read it carefully. If you have any questions about what this means, you may contact Class Counsel or you may engage your own lawyer. If you decide to retain your own lawyer, you are responsible for paying their legal fees.

10. What if I do Not Want to be Bound by the Settlement? Can I Opt Out of the Proposed Settlement?

Yes. If you do not want to be bound by the proposed settlement, you must opt out of the class action by 5 pm on April 23, 2026. If you opt out, you will not be entitled to any compensation under the class action settlement.

If you want to commence your own lawsuit, you must opt out.

If you opt out, you must abide by any applicable limitation periods. We strongly recommend you consult a lawyer before making the decision to opt out.

To opt out of the settlement, you must submit an Opt-Out Form to the Class Counsel. A copy of the Opt-Out Form is available at www.cavalluzzo.com/enbridge-pension-plan-class-action.

D. HOW TO RECEIVE A PAYMENT IF THE PROPOSED SETTLEMENT IS APPROVED

11. How will I receive a payment?

To ask for a payment, all Settlement Class Members must complete and submit a Claim Form. Enbridge will assess all claims using an approach that the Parties have agreed upon. Settlement Class Members will not need to testify in court. Once the claim is verified, they will receive compensation as soon as reasonably possible.

Before anyone can file a Claim Form or be assessed, the Ontario Superior Court of Justice must decide whether to grant final approval of the proposed settlement (see “**The Approval Hearing**” below).

If the settlement is approved, we will provide more information about the claims process, including the Claim Form, in a further notice.

12. How will payments be calculated?

Enbridge, in consultation with Cavalluzzo LLP, will review your Claim Form and determine if you qualify for a payment. If you do, Enbridge, in consultation with its’ actuaries and Cavalluzzo LLP, will determine the amount of your payment based on the Settlement Term Sheet.

Importantly, the settlement is for a fixed amount, meaning that Enbridge does not “save” money by denying claims. The net figure payable to Class Members will depend on: (a) how much of the Settlement Sum is allocated to pay Class Counsel's legal costs; and (b) the number of Class Members who apply for payment. Any amount that is not paid out pursuant to the process set out in the Settlement Term Sheet, if approved, will be paid to the Canadian Women’s Foundation.

The full Settlement Term Sheet at www.cavalluzzo.com/enbridge-pension-plan-class-action explains fully how much is being paid and how it is being distributed.

13. What if I disagree with the decision?

If a decision is made that you are not a Settlement Class Member you can bring a motion to challenge Enbridge's assessment at your own cost.

E. THE LAWYERS REPRESENTING YOU

15. Who is Class Counsel?

Cavalluzzo LLP represents the Representative Plaintiff and the Class Members. If you want to be represented by or receive advice from another lawyer, you may hire one at your own expense.

16. Do I have to pay Class Counsel anything?

No.

Class Counsel is asking for the approval of fees and disbursements plus HST. The fee sought is 30% of the Settlement Sum which Enbridge has committed to pay. All amounts approved for Class Counsel will be paid directly by Enbridge from the total amount set aside to settle the class action. Class Counsel will not be paid unless the Ontario Superior Court declares that the proposed legal fees are fair and reasonable.

You will not need to pay any legal fees out of your own pocket for services from Class Counsel relating to the Class Action. If a Class Member retains other lawyers or a personal representative, that Class Member is responsible for paying their own lawyer or representative's fees, disbursements, and taxes.

F. PARTICIPATING IN THE PROPOSED SETTLEMENT HEARING

You may do nothing and be bound by the decision of the Court. Alternatively, you may participate in the hearing to voice your support for the proposed settlement or to object to the proposed settlement if you disagree with all or part of it, and you may also voice support or disapproval of the proposed legal fees payments (and be bound by the decision of the Court). The Court will consider your views.

17. How do I tell the Court if I support the proposed settlement?

To express your support for the proposed settlement, the proposed legal fees, or both, you may write a letter that includes the following:

- Your name, address, and telephone number;
- A statement saying that you support the Enbridge Class Action proposed settlement, legal fees, or both;
- The reasons you support the proposed settlement, legal fees, or both, along with any supporting materials; and,
- Your signature.

You may mail or email your letter to:

Enbridge Class Action
c/o Cavalluzzo LLP, 474 Bathurst Street, Suite 300
Toronto, Ontario, M5T 2S6
Email: enbridgepensioncase@cavalluzzo.com

18. How do I tell the Court if I do not like the proposed settlement or legal fees?

To object to the proposed settlement, you may either:

- (a) **Make a written objection:** Write a letter or email that includes the following information:
- Your name, address, and telephone number;
 - A statement saying that you object to the Enbridge Class Action proposed settlement or the legal fees or both;
 - The reasons you object to the proposed settlement, fees, or both, along with any supporting materials; and
 - Your signature.
- (b) **Make an oral objection at the approval hearing:** You must fill out an Objection Form and indicate that you intend to appear at the hearing to request the opportunity to speak. The approval hearing before the Court is scheduled to be heard in Toronto, Ontario on May 28, 2026 at 10:00 am.

All objecting letters or emails, including any Objection Forms, must be sent on or before May 21, 2026 to:

Enbridge Class Action
c/o Cavalluzzo LLP, 474 Bathurst Street, Suite 300
Toronto, Ontario, M5T 2S6
Email: enbridgepensioncase@cavalluzzo.com

G. THE APPROVAL HEARING

19. When/where will the Court decide whether to approve the proposed settlement and/or the legal fees?

The Ontario Superior Court of Justice will hold an Approval Hearing in Toronto, Ontario on **May 28, 2026 at 10:00 a.m.**

This is a public hearing, and you may attend if you wish. As a Class Member, you may also ask to speak, but you do not have to do so, and the Court must give leave for you to do so.

The hearing date could be moved to a different date or time without additional notice. If you plan to attend the hearing, we recommend you check Class Counsel website at www.cavalluzzo.com/enbridge-pension-plan-class-action or call 1-877-252-9168.

At the hearing, the Court will consider whether the proposed settlement is fair, reasonable, and in the best interests of the Class. If there are objections, the Court will consider requests by Class Members who submitted an Objection Form, to speak at the hearing.

After the hearing, the Court will decide whether to approve the proposed settlement. We cannot guarantee when the Judge will release his decision.

The Court will, at the same, consider whether the proposed legal fees are fair and reasonable.

20. What if I do nothing?

If you are a Class Member and you do nothing, you are deemed to have accepted the proposed settlement. The approval hearing will proceed and the Court will consider whether the proposed settlement is fair, reasonable, and in the best interests of the Class. You will have no further opportunity to make objections to the Court with respect to the proposed settlement. You will be bound by the decision of the Court.

H. GETTING MORE INFORMATION

21. How do I get more information?

This notice summarizes the proposed settlement. For full details, a copy of the proposed settlement Term Sheet is available at: www.cavalluzzo.com/enbridge-pension-plan-class-action.

If you have any questions, you may send them to:

Enbridge Class Action
Cavalluzzo LLP
474 Bathurst Street, Suite 300
Toronto, Ontario M5T 2S6

or email:

enbridgepensioncase@cavalluzzo.com

or call:

1-877-252-9168