

## **SCHEDULE “B” – Notice Plan**

1. The mechanics of the implementation and administration of the Settlement Term Sheet for the proposed settlement in the Enbridge Class Action shall be in accordance with this Notice Plan.
2. Defined terms in the Settlement Term Sheet and Amended Amended Statement of Claim (“Claim”) have the same meaning in this Notice Plan.
3. Class Counsel's and Enbridge's preparation of this Notice Plan and Class Counsel's representation of the Class Members generally does not in any way extend to tax inquiries or tax advice relating to the Settlement Term Sheet, or the settlement payments to Class Members. Neither Class Counsel nor Enbridge is providing tax advice to the Class or any Class Member. Class Members will be advised to seek independent tax advice.
4. All costs associated with giving notice to Settlement Class Members will be borne by Enbridge, except that Class Counsel will assume the cost of posting notices on its website and sending emails to those on its own lists.

### **Identification of Settlement Class Members**

Enbridge has, with input from Class Counsel, prepared a list of all Class Members who are eligible for compensation payments pursuant to the Settlement Term Sheet (“Settlement Class Members”), along with, wherever available, their last known physical address, telephone number, and email addresses. Such information has or will be compiled from payroll information maintained by Enbridge and/or pension administration information maintained by Enbridge as pension plan administrator of the Enbridge Pension Plans.

5. Enbridge will retain a search firm to make reasonable efforts to locate an address for any Settlement Class Member entitled to a payment in the 2026 Mercer Report for whom they do not have recent contact information, at its own cost, and on an appropriate timeline to support dissemination of the First Notice as fully as possible.

**The First Notice**

6. Within 30 days following the First Order being signed, Enbridge and Class Counsel will disseminate the First Notice in the manner described below.

7. This First Notice shall be posted on Class Counsel's website at [www.cavalluzzo.com/enbridge-pension-plan-class-action](http://www.cavalluzzo.com/enbridge-pension-plan-class-action).

8. Class Counsel will send an email containing the First Notice to all individuals who have contacted Class Counsel about this Class Action. The Parties will reasonably agree on additional wording to be provided to those individuals who are not Settlement Class Members.

9. Class Counsel will make best efforts to cause the First Notice to be disseminated in platforms conventionally used by the Union, including on their website and using social media platforms.

10. Class Counsel, with the assistance of the Representative Plaintiff, will post the First Notice on the "Consumers Gas Employees" Facebook page.

11. The First Notice will be sent by Enbridge to all Settlement Class Members eligible for a payment pursuant to the Settlement Term Sheet to both their last known physical address and to their last known email, insofar as Enbridge has been able to determine such information.

12. Enbridge will supply Class Counsel with confirmation, in a form reasonably acceptable to Class Counsel, that the First Notice has been disseminated by it in the manner outlined in para. 11 of this Notice Plan.

**The Second Notice**

13. Within 60 days of the First Order, Enbridge and Class Counsel will disseminate the Second Notice in the manner described below.

14. This Second Notice, along with a Claim Form, shall be posted on Class Counsel's website [www.cavalluzzo.com/enbridge-pension-plan-class-action](http://www.cavalluzzo.com/enbridge-pension-plan-class-action).

15. Class Counsel will send an email containing the Second Notice, along with the Claim Form, to all individuals who have contacted Class Counsel about this Class Action.

16. Class Counsel will make best efforts to cause the Second Notice, along with the Claim Form, to be disseminated in platforms conventionally used by the Union, including on their website and using social media platforms.

17. Class Counsel, with the assistance of the Representative Plaintiff will post the Second Notice, along with the Claim Form, on the "Consumers Gas Employees" Facebook page.

18. The Second Notice, along with the Claim Forms, will be sent by Enbridge to all Settlement Class Members eligible for a payment pursuant to the Settlement Term Sheet to both their last known physical address and to their last known email, insofar as Enbridge has been able to determine such information, unless Class Counsel has provided the Second Notice according to paragraph 15 above.

19. Enbridge will supply Class Counsel with confirmation, in a form reasonably acceptable to

Class Counsel, that the Second Notice has been sent in the manner outlined in this Notice Plan.

**Reports to Class Counsel and Class Counsel's Monitoring Role**

20. Class Counsel will oversee the Notice Plan and provide advice and assistance to Enbridge, through its counsel, regarding this Notice Plan.

21. Enbridge, through its counsel, will provide Class Counsel with ongoing reports of its progress in a form acceptable to Class Counsel, acting reasonably. Without limiting the generality of this reporting obligation, and without purporting to replace the other notices and information Enbridge has agreed to provide elsewhere in the Notice Plan, the reports will concern the statistics and details concerning Enbridge's efforts to disseminate the First Notice and the Second Notice, including the number of notices and emails returned as undeliverable.