

Second Notice – Direct Mailing

NOTICE OF SETTLEMENT APPROVAL

ENBRIDGE PENSION PLAN CLASS ACTION

You are eligible for a payment as part of a class action settlement. Please read this notice carefully, as it will affect your legal rights.

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

Dear [Name],

Notice of Class Action Settlement

A settlement was recently reached in the Enbridge Pension Plan Class Action, as explained below. You are receiving this letter because you are one of the limited number of persons eligible for a payment under this Settlement.

Please read this notice carefully for details of the Settlement.

Settlement of the Enbridge Class Action

This Class Action, brought by Sue Williams on behalf of Enbridge employees who took maternity, pregnancy and/or parental leaves after 1987 and while working at Enbridge companies, alleges that Enbridge failed to properly administer the paperwork for parental leaves, resulting in lower pension service being awarded to a limited number of impacted persons.

Enbridge has denied all of these allegations. The Court has not made any decision regarding the allegations in this Class Action. Instead, Ms. Williams and Enbridge have reached a Settlement. As a result, a limited group of impacted Class Members (the “Settlement Class Members”) are eligible to make a claim for a payment under the terms of the Settlement.

Payments to Settlement Class Members

As a Settlement Class Member, you are eligible for payment under the Settlement. To receive this payment, **you must complete a Claim Form and send it to Enbridge at the contact information below to be received by September 1, 2026.** Claim Forms will be available on the Class Action Website or by contacting Class Counsel. You will not incur any out-of-pocket expenses in making a claim.

You will not be able to apply for payment as a Settlement Class Member after September 1, 2026. If you do not submit a completed Claim Form by the deadline, the amount you are entitled to receive under the Settlement will remain in the Settlement Sum. Any amount of the Settlement Sum which is not paid out will be paid to the Canadian Women’s Foundation.

The following pages provide more information on the Class Action and the Settlement.

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A. BASIC INFORMATION

1. Why did I get this notice?

Based on Enbridge's records, we have determined that you are a Settlement Class Member. The Ontario Superior Court of Justice authorized this notice to inform you of this.

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.

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 gone to trial. The Court has not made any decision on the merits of the allegations in this Class Action. Instead, Ms. Williams and Enbridge have reached a Settlement.

5. *Why is there a Settlement?*

The Representative Plaintiff and Enbridge have agreed to the Settlement. By agreeing to the 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 Settlement is in the best interests of all Class Members.

B. WHO IS INCLUDED IN THE SETTLEMENT?
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6. *Who is included in the Settlement?*

The Class Members for this Class Action 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 (the “Class Members”).

You are a Class Member if you meet this definition. Not all Class Members are eligible for payment under the Settlement.

A smaller group of Class Members (or their Estates) – the “Settlement Class Members” – are eligible for a payment. The Settlement provides for 223 Settlement Class Members to claim amounts which together add up to approximately \$826,836 (the “Settlement Sum”).

C. PROPOSED SETTLEMENT

7. What does the proposed Settlement provide?

The Settlement provides that Settlement Class Members are eligible for compensation.

The Settlement provides for 223 Settlement Class Members to claim amounts which together add up to the Settlement Sum of approximately \$826,836. 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 Settlement Class Member’s amount will be different because each individual’s situation is different.

A full copy of the Settlement Agreement is available for your review at: <https://www.cavalluzzo.com/enbridgeclassaction>. It sets out the approach that will be taken to each Settlement Class Member’s claim.

8. How does the Settlement impact my legal rights?

If you are a Class Member and you did not opt out of the Class Action, you have given up your right to sue Enbridge for the claims outlined in the Amended Statement of Claim (the “Claim”) that got this case started. In other words, you have “released” Enbridge from liability for the claims set out by this Class Action.

This means you cannot sue Enbridge for anything in respect of alleged Missed Service for Statutory Leaves in the Affected Period (which starts at either 1988 or 1990, depending on the Enbridge entity, and ends in 2001). This is true even if you are a Settlement Class Member and you decide not to claim your payment under the Settlement.

The Settlement 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.

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, or the settlement payments to Settlement Class Members. Neither Class Counsel nor Enbridge is providing any tax advice to the Settlement Class or any Settlement Class Member. Settlement Class Members are solely responsible for determining the tax treatment of any settlement payment and are encouraged to seek independent tax advice.

D. HOW TO RECEIVE A PAYMENT

9. How will I receive a payment?

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

A copy of the Claim Form is available at www.cavalluzzo.com/enbridge-pension-plan-class-action. It must be filled out and submitted to Enbridge to be received by September 1, 2026.

10. How will payments be calculated?

The amount of your payment is based on the process outlined in the Settlement, and approved by the Court

Importantly, the Settlement is for a fixed amount, meaning that Enbridge does not “save” money by denying claims. The net figure payable to Settlement Class Members will depend on how much of the settlement sum is allocated to pay Class Counsel's legal costs. Any amount that is not paid out pursuant to the process set out in the Settlement will be paid to the Canadian Women's Foundation.

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

11. What if I disagree with the decision?

If a decision is made regarding your compensation that you disagree with, you can bring a motion to challenge the assessment at your own cost.

12. Can I receive a payment on behalf of a deceased Settlement class member?

Yes. The Claim Form contains instructions on making a claim to receive payment on behalf of a deceased Settlement Class Member.

Claim Forms can be found on the Class Action Website or by contacting Class Counsel. If you have questions about how you can make a claim on behalf of the estate of a deceased Settlement Class Member, you may contact Class Counsel.

E. THE LAWYERS REPRESENTING YOU

13. 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.

14. Do I have to pay Class Counsel anything?

No.

Class Counsel will be paid legal fees and disbursements, plus HST, in an amount that the Ontario Superior Court has declared is fair and reasonable. All amounts approved for Class Counsel will be paid directly from the total amount set aside by Enbridge to settle the class action. The fee is 30% of the Settlement Sum which Enbridge has committed to pay.

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. GETTING MORE INFORMATION

15. How do I get more information?

This notice summarizes the most important details of the Settlement. If you wish to read the full Settlement, a copy 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