

SCHEDULE “B”***LONG NOTICE OF CERTIFICATION AS A CLASS ACTION***

*To: All former and current employees of Medcan Health Management Inc. (the
“Company”)*

**THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ
CAREFULLY.****The Nature of the Action**

On April 7, 2020, Nicole Curtis and Amr Galal commenced an action in the Ontario Superior Court of Justice against the Company.

This action was brought on behalf of all variable compensation employees of Medcan Health Management Inc. who worked from April 7, 2005 until the date when the notice is delivered to the class.

The action alleges that the Company’s variable compensation employees were underpaid vacation and public holiday pay on their variable compensation. The Company disputes these claims.

By order dated October 26, 2022, The Honourable Justice Perell certified the action as a class proceeding against the Company and appointed Nicole Curtis, Amr Galal, and Katrina Buhlman as representative plaintiffs for the class.

Participation in the Class Action

In a class proceeding, the common issues are determined at a common issues trial and the individual issues are determined at individual issues trials. If you were a variable compensation employee of the Company and fall within the class definition, you will be automatically included as a member of the class unless you opt out. All members of the class will be bound by the judgment of the Court at the common issues trial, or any settlement reached by the parties and approved by the Court. Depending on the outcome of the common issues, there may be individual issues trials to determine the claims of the individual class members and the company’s defence to those individual claims.

Fees and Disbursements

You do not need to pay any legal fees out of your own pocket with respect to the common issues trial. A retainer agreement has been entered into between the representative plaintiff and Class Counsel with respect to legal fees for the common issues stage of the proceeding. The agreement provides that the law firm has been retained on a contingency fee basis, whereby it will be paid its fees only in the event of a successful result in the litigation or a Court approved settlement. The fees payable to the lawyers for the class will be paid out of any judgment and will not be paid directly by class members for the common issues trial. Any fee paid to lawyers for the class is subject to the Court’s approval.

If the action proceeds to individual issues trials, you are free to choose a lawyer of your own choice or you may choose to retain Class Counsel on a contingency fee basis whereby it will be paid its fees only in the event of a successful result in the litigation or a settlement.

Opt Out

If you wish to exclude yourself from this class proceeding (“opt out”), you must complete and return the “Opt Out” form by no later than FRIDAY FEBRUARY 24, 2023.

The Opt Out form may be downloaded at:

<https://www.monkouselaw.com/medcan-vacation-and-holiday-pay-class-action/>

If you would like to opt out, you can also e-mail, fax, or send a letter to Class Counsel that states your intention to opt-out.

If you choose to opt out within the above noted deadline you will not recover any monies in the event the representative plaintiffs are successful in this action and you will not be bound by any court decision in these proceedings.

If you do not choose to opt out by the prescribed deadline, you will be bound by any judgment ultimately obtained in these proceedings, whether favourable or not, or any settlement if approved by the court.

You may wish to obtain independent legal advice with respect to this matter.

Contact Information

If you have any questions or concerns about the matters in this Notice or the status of this Class Action, please visit:

<https://www.monkouselaw.com/medcan-vacation-and-holiday-pay-class-action/>

You may contact Class Counsel in a number of ways.

By email at the following address:

Medcan.classaction@monkouselaw.com

By mail at the following address:

220 Bay Street, Suite 900

Toronto, Ontario

M5J 2W4

Or by fax or telephone:

Phone: (416) 907-9249

Fax: (888) 501-723