

**SHORT FORM NOTICE OF CERTIFICATION AND SETTLEMENT
APPROVAL**

**WERE YOU AN EMPLOYEE OF SOS (SUDBURY) INC. OR WORKFORCE
INC. BETWEEN JANUARY 1, 2011 AND DECEMBER 31, 2022?**

You are receiving this notice because you have been identified as a potential class member in the Workforce Class Action, described below.

READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS

1. What is this lawsuit about?

On September 29, 2021, Jordan Lock (the “Plaintiff”), commenced a proposed class action seeking to represent current and former employees who worked for Workforce Inc. and/or SOS (Sudbury) Inc. (the “Defendants”) who are allegedly owed compensation as a result of receiving unpaid training by, or on behalf of, the Defendants or others. The Defendants have denied all the plaintiff’s allegations.

Monkhouse Law represents the proposed class (“Class Counsel”).

The Class is: All non-salaried employees of Workforce Inc. or SOS (Sudbury) Inc. from January 1, 2011 to December 31, 2022 who received unpaid training from or at the direction of the Defendants.

This action was certified as a class proceeding on March 9, 2023.

2. Why is this notice being given?

The parties to the class action have reached a settlement (the “**Settlement**”) to resolve all claims in connection with any conduct alleged, or which could have been alleged, in this action. The Settlement is a compromise of disputed claims against the Defendants without any admission of liability by the Defendants. The Defendants deny the allegations in the claim. The Settlement was approved by the Honourable Mr. Justice Glustein on March 9, 2023.

The purpose of this document is to provide notice of the approval of the Settlement and Class Counsel’s fees, and to advise you how to make a claim for compensation pursuant to the Settlement.

3. Am I a member of the Class?

You are a Class Member and are entitled to participate in the proceeding if you fall within the following definition:

All non-salaried employees of Workforce Inc. or SOS (Sudbury) Inc. from January 1, 2011 to December 31, 2022 who received unpaid training from or at the direction of the Defendants. (“Class Members”)

4. What settlement has been reached and how can I claim compensation?

Under the Settlement, the Defendants shall pay an all-inclusive amount of \$650,000 (the “**Gross Settlement Funds**”) in exchange for, among other things, a full and final release of the claims against the Defendants. The Gross Settlement Funds will be reduced by Class Counsel’s fees, HST, disbursements, settlement administration costs and an Honorarium for the Plaintiff. The remaining amount shall be available to be distributed in accordance with the Distribution Plan in the Settlement, including a distribution to eligible class members.

To be eligible to receive a payment under the Settlement, you must complete a Claims Form and return it to Class Counsel by JUNE 10, 2023

Claims Forms can be submitted to Class Counsel either by email or mail at the following:

Workforce.classaction@monkhouselaw.com

Workforce Class Action
c/o Monkhouse Law, 220 Bay Street, Suite
900,
Toronto, Ontario, M5J 2W4

For a copy of the Claims Form and information on how to complete and submit it, or for more general information, please visit the following web page:

<https://www.monkhouselaw.com/workforce-and-sos-unpaid-training-class-action/>

5. How much will Class Counsel be paid?

You will not have to pay any of the fees and expenses of Class Counsel. The Court has approved a contingency fee agreement and has fixed Class Counsel fees and disbursements in the amount of \$267,232.00. This amount is inclusive of all HST and disbursements.

6. Can I remove myself from the Class?

You have the right to opt out of the class action. By opting out, you reserve the right to make your own claim against the Defendants. The decision to opt out should not be taken lightly, as it means that you would have to start your own claim at your own expense if you wanted to pursue an individual claim against the Defendants. You

should seek independent legal advice before choosing to take this step.

For more information on opting out, please visit the webpage listed in section 4, above.

ANY OPT-OUT FORM MUST BE SUBMITTED BY MAY 10, 2023 TO BE VALID.

7. Where can I get more information?

You may also contact Class Counsel by calling them at 416-907-9249 ext 211 or by emailing them at: workforce.classaction@monkhouselaw.com

The Ontario Superior Court of Justice has authorized distribution of this Notice.