

NOTICE OF CERTIFICATION AS A CLASS ACTION

To: All Ontario Variable Compensation employees employed as a Business
Development Agent of Allstate Insurance Company of Canada (the “Company”)
from September 1, 2009 until August 21, 2023

THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ CAREFULLY.

The Nature of the Action

On May 20, 2020, an action was commenced in the Ontario Superior Court of Justice against the Company.

The action claims that the Company’s variable compensation employees who worked in the role of Business Development Agents (“BDAs”) from September 1, 2009 to August 21, 2023 were underpaid vacation and public holiday pay on their variable compensation that was named Agency Performance Bonus (“APB”). The Company disputes these claims

By order dated January 13, 2023, the Honourable Justice Belobaba certified the action as a class proceeding against the Company and appointed Jody Delorme as representative plaintiff for the class and by order dated June 8, 2023, Justice Perell settled the terms of the Certification Order.

Participation in the Class Action

If you were a BDA of the Company and fall within the class definition, you are 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, or any settlement reached by the parties and approved by the Court. Among other things, members of the class may be found to have been underpaid vacation and public holiday pay.

At this juncture, the Court has not taken a position as to the likelihood of recovery for the

representative plaintiff or the Class, or with respect to the merits of the claims or defences asserted by either side.

Fees and Disbursements

You do not need to pay any legal fees out of your own pocket. A retainer agreement has been entered into between the representative plaintiff and Class Counsel with respect to legal fees. The agreement provides that the law firm has been retained on a contingency fee basis, whereby it will only be paid its fees 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. Any fee paid to lawyers for the class is subject to the Court’s approval.

You will not be responsible for the Company’s legal costs if the class action is unsuccessful.

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 NOVEMBER 28, 2023. The Opt Out form may be downloaded at:

<https://www.monkouselaw.com/allstate-class-action/>

If you would like to opt out, you can also e-mail, fax, or mail the completed opt-out form to Class Counsel.

If you choose to opt out within the above noted deadline you will not recover any monies in the event the representative plaintiff is 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 the this Class Action, please visit:

<https://www.monkouselaw.com/allstate-class-action/>

You may contact Class Counsel in a number of ways.

By email at the following address:

allstate.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