

**NOTICE: STATUS OF PROPOSED NATIONAL CLASS ACTIONS RELATED TO EMISSIONS CERTIFICATION AND COMPLIANCE OF VOLKSWAGEN AND AUDI DIESEL VEHICLES FROM MODEL YEARS 2009 TO 2016**

Please Read this Notice Carefully.

**Status of the Canadian Proceedings**

Among a number of proceedings commenced across Canada on October 22 2015, a proposed pan-Canadian class action was commenced in Ontario and on September 22 2015, a Quebec Class action was commenced in Quebec, both alleging that certain Volkswagen and Audi companies (the "Volkswagen and Audi Defendants") manufactured and/or installed emissions control devices, including alleged "Defeat Devices", in certain Volkswagen and Audi vehicles with diesel engines (the "Class Actions"). Case Management Judges have been appointed in the Class Actions in the Ontario Superior Court of Justice and the Superior Court of Quebec (the "Courts").

**The Affected Vehicles**

In the Class Actions, the Plaintiffs are seeking remedies in respect of all affected vehicles in all provinces and territories in Canada. The affected vehicles are as follows:

<b>DIESEL MODEL</b>	<b>MODEL YEARS (INCLUSIVE)</b>
Volkswagen Jetta	2009 - 2015
Volkswagen Jetta Wagon	2009
Volkswagen Golf	2010 - 2013, 2015
Volkswagen Passat	2012 - 2015
Volkswagen Beetle	2013 - 2015
Volkswagen Golf Wagon	2010 - 2014
Volkswagen Golf Sportwagon	2015
Audi A3	2010 - 2013, 2015
Audi A6, A7, A8, Q5	2014 - 2016
Audi Q7	2009 - 2015
Volkswagen Touareg	2009 - 2016

You have received this Notice either because you are a past or current owner or lessee of an affected vehicle, or because you have expressed interest in the Class Actions. Receipt of this Notice does not mean that you are a Class Member.

### **Negotiations**

The Plaintiffs and the Volkswagen and Audi defendants ("the Parties") are in discussions about potential settlement and remedies relating to the affected vehicles in Canada.

On or before July 29, 2016, the Courts will receive an update on settlement discussions.

Nothing is required from you at this time and you do not need to hire your own lawyer.

If the Parties reach a settlement, the terms of the settlement will be made public and notice of the settlement will be provided. In the case of a settlement, a Class will be defined and members of the Class will have an opportunity to object to the settlement, as well as an opportunity to remove themselves from (or "opt-out" of) the settlement.

### **Where to Get More Information**

If you have any questions about the status of the Class Actions in which these negotiations are taking place, please visit: [volkswagenclassaction.com](http://volkswagenclassaction.com) (all provinces except Quebec) or [recourscollectif.info](http://recourscollectif.info) (Quebec residents only). For further information about how the Volkswagen and Audi Defendants have been responding to the allegations in the Class Actions, please consult [www.vwemissionsinfo.ca](http://www.vwemissionsinfo.ca) or [www.audlemissionsinformation.ca](http://www.audlemissionsinformation.ca).

### **Status of the U.S. Proceeding**

Similar class actions have also been filed in the U.S., and a consolidated multidistrict litigation ("MDL") is currently pending in Federal Court in San Francisco. In the MDL, the Plaintiffs' Steering Committee, and certain of the Volkswagen and Audi Defendants, have requested preliminary court approval of a class action settlement for 2 litre engine affected vehicles in the U.S.

The terms of that settlement can be found on the U.S. court's website at [www.cand.uscourts.gov/crb/vwmdl](http://www.cand.uscourts.gov/crb/vwmdl). A hearing to consider whether the U.S. Federal Court will preliminarily approve the U.S. class action settlement is scheduled for July 26, 2016.

PUBLICATION OF THIS NOTICE HAS BEEN AUTHORIZED BY THE ONTARIO SUPERIOR COURT OF JUSTICE