

NOTICE OF APPROVAL OF \$4,950,000 FUEL RATING CLASS ACTION SETTLEMENT IN CANADA FOR ELIGIBLE MY2013-2017 GASOLINE AUDI, BENTLEY, PORSCHE AND VOLKSWAGEN VEHICLES

This Notice May Affect Your Legal Rights – PLEASE READ IT CAREFULLY

A settlement (the “Settlement”) has been reached and approved by the Courts in class actions alleging that the gasoline-powered Audi, Bentley, Porsche and Volkswagen vehicles listed in the Schedule below and originally sold or leased in Canada (the “Eligible Vehicles”) are equipped with transmission software resulting in fuel ratings and greenhouse gas emissions being higher than advertised. **You may be entitled to make a claim for compensation. Please follow the instructions below to make a claim for compensation.**

The Settlement provides compensation to Class Members for additional fuel costs. The compensation received by Class Members will be paid out of the funds remaining from the \$4,950,000 Settlement proceeds after deducting the court-approved legal fees and disbursements (including taxes) of Class Counsel, the costs of administering and distributing the Settlement, and amounts owing to Ontario’s *Class Proceedings Fund* and Quebec’s *Fonds d’aide aux actions collectives*.

Who Is a Settlement Class Member?

Settlement Class Members consist of individuals and entities who currently reside in Canada or the United States and, as of October 5, 2020, own or owned an Eligible Vehicle or, alternatively, lease or leased an Eligible Vehicle from Volkswagen Finance, Audi Finance or Porsche Financial Services Canada (including PFSC GP d/b/a Bentley Financial Services Canada). Please refer to the Schedule below for a list of the Eligible Vehicles.

How to Make a Claim for Compensation?

No requests were received for exclusion (i.e., to opt out) from the class actions. All Class Members are bound by the Settlement, including the distribution of the Settlement proceeds. Settlement Class Members will need to submit a claim with proof of their ownership and/or lease of an Eligible Vehicle to receive a payment.

Details on how to make a claim are available at: <https://vwfueleconomysettlement.ca/>.

How Much Compensation Could Settlement Class Members Receive?

As different vehicles have different average fuel ratings, and were owned or leased for different periods of time, the compensation payable under the Settlement is tailored for the various Eligible Vehicles and Class Members in the proceedings.

Class Members may estimate the compensation they will receive under the Settlement by using the calculator available at <https://vwfueleconomysettlement.ca/>.

Please note that the amount provided by this calculator is an “up to” estimate of what your maximum potential payment might be based on the information you provide. Compensation from the Settlement will be paid out proportionately based on the number of participating Class Members. Because of this proportionate distribution, it is not possible to assess individual payments until all of the claims have been received and reviewed. Therefore, actual payments may differ from the “up to” estimate provided by the calculator.

When to Make a Claim for Compensation

Settlement Class Members may make a claim for compensation starting on February 5, 2021. Claims may be submitted until June 7, 2021.

IMPORTANT! Any claims submitted after June 7, 2021, will not be considered by the Claims Administrator and will not be paid out of the Settlement. Also, a Settlement Class Member will be ineligible to receive compensation if their claim does not include all required supporting documents.

How will Claims be Paid?

The Claims Administrator will pay approved claims by cheque, which will be sent by regular mail to the mailing address provided by Settlement Class Members when they submit their claim. Cheques not cashed within 6 months of issuance will become stale-dated and not eligible for redemption. There will be no obligation to reissue stale-dated cheques. All payments will be made in Canadian dollars.

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For further questions or information about the Settlement, please contact the Claims Administrator at 1-866-761-1380 or info@vwfueleconomysettlement.ca. PLEASE DO NOT CONTACT AUDI, BENTLEY, PORSCHE, VOLKSWAGEN OR THE COURTS.

This Notice was approved by the Ontario Superior Court of Justice and the Superior Court of Quebec.

Make	Model	Engine	Model Year	Original Combined Rating (L/100 KM)	Restated Combined Rating (L/100 KM)	Combined Difference (L/100 KM)	Maximum Per Vehicle Payments (CAD \$)
Audi	A8L	6.3L	2013	15.0	15.5	0.5	\$1,242.00
Audi	A8L	6.3L	2015	14.2	14.6	0.4	\$993.60
Audi	A8L	6.3L	2016	14.2	14.6	0.4	\$993.60
Audi	RS7	4L	2014	12.3	12.5	0.2	\$496.80
Audi	RS7	4L	2015	13.1	13.3	0.2	\$496.80
Audi	RS7	4L	2016	13.1	13.3	0.2	\$496.80
Audi	S8	4L	2013	12.6	12.8	0.2	\$496.80
Audi	S8	4L	2014	12.6	12.8	0.2	\$496.80
Audi	S8	4L	2016	12.6	12.8	0.2	\$496.80
Bentley	Continental GT	4L	2013	12.9	13.4	0.5	\$1,242.00
Bentley	Continental GT	4L	2014	12.9	13.4	0.5	\$1,242.00
Bentley	Continental GT	4L	2015	12.7	13.1	0.4	\$993.60

Make	Model	Engine	Model Year	Original Combined Rating (L/100 KM)	Restated Combined Rating (L/100 KM)	Combined Difference (L/100 KM)	Maximum Per Vehicle Payments (CAD \$)
Bentley	Continental GT	4L	2016	12.7	13.1	0.4	\$993.60
Bentley	Continental GT	4L	2017	12.7	13.1	0.4	\$993.60
Bentley	Continental GTC	4L	2013	13.6	14.1	0.5	\$1,242.00
Bentley	Continental GTC	4L	2014	13.6	14.2	0.6	\$1,490.40
Bentley	Continental GT Convertible	4L	2015	13.8	14.4	0.6	\$1,490.40
Bentley	Continental GT Convertible	4L	2016	13.8	14.4	0.6	\$1,490.40
Bentley	Continental GT Convertible	4L	2017	13.8	14.4	0.6	\$1,490.40
Bentley	Flying Spur	6L	2014	16.0	16.5	0.5	\$1,242.00
Bentley	Flying Spur	6L	2015	16.0	16.5	0.5	\$1,242.00
Bentley	Flying Spur	4L	2015	13.8	14.2	0.4	\$993.60
Bentley	Flying Spur	6L	2016	16.0	16.5	0.5	\$1,242.00
Bentley	Flying Spur	4L	2016	13.8	14.2	0.4	\$993.60
Porsche	Cayenne	3.6L	2013	12.3	12.6	0.3	\$745.20
Porsche	Cayenne	3.6L	2014	12.0	12.4	0.4	\$993.60
Porsche	Cayenne	3.6L	2016	11.5	11.8	0.3	\$745.20
Porsche	Cayenne GTS	4.8L	2013	13.9	14.4	0.5	\$1,242.00
Porsche	Cayenne GTS	4.8L	2014	13.8	14.4	0.6	\$1,490.40
Porsche	Cayenne GTS	3.6L	2016	12.6	12.8	0.2	\$496.80
Porsche	Cayenne S	4.8L	2013	13.0	13.3	0.3	\$745.20
Porsche	Cayenne S	4.8L	2014	12.9	13.2	0.3	\$745.20
Porsche	Cayenne S	3.6L	2015	12.0	12.2	0.2	\$496.80
Porsche	Cayenne S	3.6L	2016	12.0	12.2	0.2	\$496.80
Porsche	Cayenne Turbo S	4.8L	2014	14.9	15.2	0.3	\$745.20

Make	Model	Engine	Model Year	Original Combined Rating (L/100 KM)	Restated Combined Rating (L/100 KM)	Combined Difference (L/100 KM)	Maximum Per Vehicle Payments (CAD \$)
Volkswagen	Touareg	3.6L	2013	12.2	12.6	0.4	\$993.60
Volkswagen	Touareg	3.6L	2014	12.2	12.6	0.4	\$993.60
Volkswagen	Touareg	3.6L	2015	12.2	12.4	0.2	\$496.80
Volkswagen	Touareg	3.6L	2016	12.2	12.4	0.2	\$496.80