

**NOTICE OF A PROPOSED \$4,950,000 FUEL RATING SETTLEMENT  
IN CANADA FOR ELIGIBLE 2013-2017 GASOLINE AUDI, BENTLEY,  
PORSCHE AND VOLKSWAGEN VEHICLES**

**This Notice May Affect Your Legal Rights—PLEASE READ IT CAREFULLY**

This is a proposed Settlement of class actions alleging that the gasoline-powered Audi, Bentley, Porsche and Volkswagen vehicles listed in the attached Schedule and originally sold or leased in Canada (the “Eligible Vehicles”) are equipped with transmission software resulting in fuel ratings and greenhouse gas emissions of the Eligible Vehicles being higher than advertised.

The Settlement will, if approved by the courts, provide compensation to Class Members for additional fuel costs. The compensation received by Class Members would 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 “Legal Fees”), the costs of administering and distributing the Settlement, and amounts owing to Ontario’s Class Proceedings Fund.

**Settlement Approval Hearings**

The following court hearings will be held to decide whether to approve the proposed Settlement, which hearings are open to the public (the “Approval Hearings”):

Hearing of the Ontario Superior Court of Justice on December 14, 2020 at 10:00 a.m. ET

Hearing of the Superior Court of Québec on December 15, 2020 at 9:30 a.m. ET

**Who is a Class Member?**

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).

**What Are the Options for Class Members?**

1. **Do nothing at this time:** If you support the proposed Settlement, you do not have to do anything right now. By doing nothing, you will give up the right to object to the Settlement and, if it is approved by the courts, the right to bring your own legal proceeding in relation to the above-described software;
2. **Support or Object to the proposed Settlement by December 4, 2020:** Class Members may, but are not required to, submit a form advising whether they support or object to the proposed Settlement for consideration by the courts at the Settlement approval hearings. To explain why you support or object to the Settlement (including the \$4,950,000 settlement proceeds and the distribution of those proceeds), please

complete the Written Objection/Statement of Support Form (“Object/Support Form”) available at [www.VWFuelEconomySettlement.ca](http://www.VWFuelEconomySettlement.ca) and upload it to that site or mail it to Renk v. Audi Canada Inc. et al, c/o RicePoint Administration Inc., P.O. Box 4454, Toronto Station A, 25 The Esplanade, Toronto, ON M5W 4B1 postmarked by December 4, 2020.

3. **Exclude yourself (opt out) by December 4, 2020:** Class Members who exclude themselves from the class actions will not be bound by the Settlement or be able to share in its proceeds, but will retain their legal rights to bring their own legal proceeding. To opt-out, please complete the Opt-Out Form available at [www.VWFuelEconomySettlement.ca](http://www.VWFuelEconomySettlement.ca) and upload it to that site or mail it to Renk v. Audi Canada Inc. et al, c/o RicePoint Administration Inc., P.O. Box 4454, Toronto Station A, 25 The Esplanade, Toronto, ON M5W 4B1 postmarked by December 4, 2020. Class Members who reside in Québec must also send the Opt Out Form to the Clerk of the Superior Court of Quebec, Palais de Justice, 1, Notre-Dame Street East, Montreal (Quebec) H2Y 1B6, Court file No. 500-06-000828-166.

Unless they opt out, Class Members will be bound by the Settlement if approved by the courts, including the distribution of the Settlement proceeds. 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 for when and how to submit a claim will be provided at [www.VWFuelEconomySettlement.ca](http://www.VWFuelEconomySettlement.ca).

#### **Schedule of Eligible Vehicles and Maximum Payments**

The Maximum Per Vehicle Payments provide compensation for additional fuel costs covering 96 months from the Eligible Vehicle’s in-service date. The Maximum Per Vehicle Payments are determined by multiplying the difference between the original and restated average fuel rating (known as the Combined rating) of the Eligible Vehicles by 1,666.67 km/month, 96 months, and a negotiated fuel price of \$1.35/L, plus an additional goodwill payment of 15% for any inconvenience to Class Members.

Class Members who hold active leases as of October 5, 2020 are entitled to compensation for the full duration of their lease.

Class Members who owned their Eligible Vehicle as of October 5, 2020 are entitled to compensation for the months that they owned their Eligible Vehicle and/or previously leased it, and may also be eligible for compensation for any future time remaining on the 96-month period.

If Class Members either leased their Eligible Vehicle with such lease having ended before October 5, 2020, and/or purchased and sold their Eligible Vehicle before October 5, 2020, such Class Members are entitled to a payment based on the number of months they possessed it, up to a total of 96 months.

Please note that compensation from the Settlement will be paid out to Class Members proportionately based on the number of participating Class Members up to the amount of the Maximum Per Vehicle Payments. Because of this proportionate distribution, it is not possible to estimate the individual payments to Class Members until all of the claims have been received and reviewed.

<b>Make</b>	<b>Model</b>	<b>Engine</b>	<b>Model Year</b>	<b>Original Combined Rating (L/100 KM)</b>	<b>Restated Combined Rating (L/100 KM)</b>	<b>Combined Difference (L/100 KM)</b>	<b>Maximum Per Vehicle Payments (CAD \$)</b>
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

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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
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

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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
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