

SCHEDULE “D”

KEURIG K-CUP RECYCLING CANADIAN CLASS ACTION

CANADIAN NOTICE PLAN

1. For the purposes of this Notice Plan, the definitions set out in the Settlement Agreement apply to and are incorporated into this Notice Plan.
2. The proposed Notice Plan has been designed to provide the best notice practicable.
3. The Notice of Certification and Settlement Approval Hearing is attached as **Schedule “A1”**.
4. The Notice of Settlement Approval shall be jointly drafted by the Parties after the Certification and Notice Approval Order attached as Schedule “B” to the Settlement Agreement is issued by the Court.
5. There will no other forms of notice other than what is provided for herein, except as agreed to by the Parties or as ordered by the Court.
6. Class Counsel will provide all notice communications and publications to the Defendant for review and approval before publishing or delivering such notices.

Pre-Approval Notice

7. The Defendant will make reasonable efforts to provide Class Counsel with a list of the email addresses of Persons who were subscribed to keurig.ca as at July 1, 2023.
8. The Defendant shall provide the list of the email addresses referenced in paragraph 7 to Class Counsel and/or any Court-appointed notice provider and/or the Claims Administrator within thirty (30) days after the Execution Date.
9. The information shall be delivered by the Defendant to Class Counsel and/or any Court-appointed notice provider and/or the Claims Administrator via secure file transfer.
10. The email addresses referenced in paragraph 6 shall be collected, used and retained pursuant to applicable privacy laws in Canada. All information provided shall be treated as private and confidential by Class Counsel or any Court-appointed notice provider and/or the Claims Administrator and shall not be disclosed except in accordance with the Settlement Agreement, the Distribution Protocol, and orders of this Court.
11. The Court-appointed notice provider and/or the Claims Administrator will effectuate direct email notice to all Persons for whom email address information is provided.
12. Class Counsel will publish a news release on the Canadian Newswire in French and English.

13. Class Counsel will publish a 1/3-page advertisement in The Globe & Mail and a 1/2-page advertisement in *La Presse*+
14. Class Counsel will publish a notice on its website at www.clg.org.
15. The Claims Administrator will establish and publish a notice on the Settlement Website at www.kcupsrecyclingsettlement.ca.
16. Class Counsel send a direct email notice to all Settlement Class members that have contacted Class Counsel as of the effective date of this Settlement Agreement.

Approval Notice

17. The Claims Administrator will publish a news release on the Canadian Newswire in French and English.
18. The Claims Administrator will effectuate direct email notice to all Persons for whom email address information is provided.
19. The Claims Administrator will publish a notice on the Settlement Website at www.kcupsrecyclingsettlement.ca.
20. Class Counsel will conduct a Google Keyword Advertising Campaign in respect of the approval notice at a cost of CAD \$15,000.
21. Class Counsel will conduct a Facebook Ad Campaign in respect of the approval notice at a cost of CAD \$65,000.
22. Class Counsel will publish an approval notice on its website at www.clg.org.
23. Class Counsel will publish an approval notice on its Facebook and Twitter (X) profiles.
24. Class Counsel will send a direct email notice of all Settlement Class members that have contacted Class Counsel as of the effective date of this Settlement Agreement.
25. Settlement Class members will only be permitted to begin submitting Claim Forms once all approval notices have been published.