SETTLEMENT NOTICE (LONG FORM)

WERE YOU PHYSICALLY, SEXUALLY OR PSYCHOLOGICALLY ABUSED BY A CHRISTIAN BROTHER (OR FORMER CHRISTIAN BROTHER) WHILE ENROLLED AS A STUDENT AT VANCOUVER COLLEGE ANY TIME BETWEEN 1976 AND 2013, OR AT ST. THOMAS MORE COLLEGIATE ANY TIME BETWEEN 1976 AND 1989?

IF SO, YOU ARE ELIGIBLE TO APPLY FOR MONEY FROM A CLASS ACTION SETTLEMENT

THE DEADLINE TO MAKE A CLAIM FROM THE PRIMARY FUND IS SEPTEMBER 13, 2027.

Vancouver College and St. Thomas More Collegiate Class Action Settlement

1. WHAT IS THE CLASS ACTION ABOUT?

In February 2021, a class action was started in British Columbia concerning claims of physical, sexual and psychological abuse committed by current or former members of the Christian Brothers at Vancouver College (over the years 1976-2013) and St. Thomas More Collegiate (over the years 1976-1989).

The action claims that Vancouver College Ltd. (“**VCL**”), St. Thomas More Collegiate Ltd. (“**STMCL**”), and the Roman Catholic Archbishop of Vancouver (together, the **“Settling Defendants”**) were negligent and/or breached their duties to the students by failing to protect the students at Vancouver College and St. Thomas More from the alleged physical, sexual and psychological abuse done by then current or former members of the Christian Brothers of Ireland in Canada (collectively **“Christian Brothers”**). The action also claims that these defendants are vicariously liable for this alleged abuse. The remaining defendants in this action are four of the alleged abusive Christian Brothers, their superior Gerard Gabriel McHugh and The Roman Catholic Episcopal Corporation of St. John’s (which is currently protected by a stay of proceedings under the *Companies’ Creditors Arrangement Act*, R.S.C., 1985, c. C-36).

2. WHAT SETTLEMENT HAS BEEN ACHIEVED?

A settlement was reached with the Settling Defendants. The Settling Defendants have agreed to pay a total of CAD $30,000,000 for the resolution of claims by Class Members as against them.

The settlement received court approval on July 30, 2026. The action will continue against the remaining defendants.

3. DISTRIBUTION OF SETTLEMENT FUNDS

A. How much money is available for distribution?

The settlement amount totals CAD $30 million. The settlement amount, plus any interest, and less court-approved legal fees, disbursements, administration expenses, and applicable taxes (the **"Net Settlement Amount"**), is available for distribution to eligible Class Members (set out below under "who can make a claim?").

B. Who can make a claim?

"Class Members" are eligible to file a claim to receive a share of the Net Settlement Amount. You are a "Class Member" and eligible to make a claim for compensation for the abuse you suffered if you:

- ✓ were enrolled at Vancouver College between 1976 and 2013, or St. Thomas More Collegiate between 1976 and 1989; **and**
- ✓ claim to have experienced physical, sexual, and/or psychological abuse by a current or former member of the Christian Brothers.

C. How will the settlement funds be distributed?

The Net Settlement Amount will be divided into two funds with different claims deadlines to provide compensation to Class Members as quickly as possible while ensuring that every individual is treated with fairness and care and as many Class Members as possible are given the opportunity to submit a claim for compensation. The Net Settlement Amount will be allocated between the two funds as follows:

Settlement Funds	**Amount of Net Settlement Amount Allocated**
Primary Fund A Primary Fund with a claims deadline of September 13, 2027. It is in the best interests of Class Members to file their claim under the Primary Fund.	90%
Secondary Fund A smaller reserve Secondary Fund for late claims with a claims deadline of September 11, 2028.	10%

As soon as possible after the expiry of the Primary Fund Deadline (September 13, 2027) and the completion of Primary Fund claim assessments, the Claims Administrator will seek Court approval for distribution of the Primary Fund to eligible Class Members. Class Members will receive:

a) the **total value of their claim assessment** (explained below under "How will the claims be assessed?") if the total value of all claim assessments is <u>less</u> than the funds available in the Primary Fund; or
b) a **pro rated percentage value of their claim assessment** if the total value of all claim assessments <u>exceeds</u> the funds available in Primary Fund.

There may also be the possibility of earlier partial distributions of awards from the Primary Fund but this will ultimately depend on the number and severity of claims received and projections as to the sufficiency of the funds.

The Secondary Fund will be distributed to eligible Class Members as soon as possible after expiry of the Secondary Fund Deadline (September 11, 2028) and the completion of the Secondary claim assessments. The Secondary Fund will also be distributed on a pro rata basis if necessary to ensure a fair and equitable distribution between all Class Members.

<u>*What is a pro rata distribution and why is it used?*</u>

As noted above, if the total value of all claim assessments <u>exceeds</u> the settlement funds available for distribution, each Class Members' assessment will be adjusted and distributed *pro rata* from the funds. This means that Class Members will only receive a percentage of their assessed claim if the total value of all claims exceeds the available funds.

Pro rata distribution is the proportional allocation of an asset (in this case the Net Settlement Amount) amongst stakeholders based on their specific share or claim percentage. It ensures fair, equitable distribution amongst Class Members. Instead of a "first-come, first-served" approach, this system ensures that Class Members will receive the same percentage of their assessed claim.

D. How will the claims be assessed?

All Class Members start the claims process by filling out the same Class Member Claim Form: https://www.bcchristianbrothersclaims.ca/how-to-claim

<u>*Assessment Tiers and Monetary Limits on Compensation*</u>

A completed Class Member Claim Form will be assessed under one of two tiers depending on the severity of the claim. <u>The Claims Administrator decides which tier your claim is eligible for based upon the information provided in the Class Member Claim Form</u>; however, a Class Member that the Claims Administrator determines is eligible for Tier 2 may elect to have their assessment done under Tier 1 if they do not wish to provide the personal information and/or evidence which may be required to establish a claim in Tier 2.

Tier 1 – CAD $30,000 monetary limit on compensation

- For Class Members who experienced physical, psychological, and/or sexual abuse that had less severe or short-term effects on the Claimant's life.
- Class Members are only required to fill out the Class Member Claim Form with its associated, sworn declaration.

Tier 2 – No set monetary limit on total compensation but CAD $1,000,000 monetary limit on compensation for loss of income and loss of earning capacity

- For Class Members who experienced physical, psychological, and/or sexual abuse that had moderate to severe effects on the Claimant's life.
- In addition to the Class Member Claim Form with its associated, sworn declaration, the Tier 2 process requires Class Members to provide more evidence and information in order to assist in the assessment of the Claim, such as:
    - an interview with the Claims Administrator;
    - all relevant documentation (i.e. medical, employment, or tax records) in their possession or control, or authorizations granting the Claims Administrator access to this supporting documentation; and
    - names and contact information for witnesses who have knowledge of the events or harm.

Assessment Principles

All claims will be assessed for three types of damages:

- compensation for pain, suffering and loss of enjoyment of life ("non-pecuniary damages");
- loss of income and loss of earning capacity; and
- future care.

In assessing these claims, the Claims Administrator will take into account principles established in the case law at the time of assessment as well as any legal risks such as causation issues and any frailties in supporting evidence to arrive at a risk informed assessment of the claim.

E. How much money will Class Members get?

We cannot predict how much money each Class Member will get at this time. As explained above, the claims process provides for individualized harms-based assessments of each claim. The amount of money an eligible Class Member will receive ultimately depends upon their individualized harms-based assessment, the applicable monetary cap (tier 1 or tier 2) and the total value of all Claim Assessments which may require the claims to be distributed on a pro rata or percentage basis.

4. APPLYING TO RECEIVE COMPENSATION FOR THE ABUSE YOU SUFFERED

Class Members who want to receive compensation from the Primary Fund must fill out and submit a Class Member Claim Form **no later than September 13, 2027 (the "Primary Fund Deadline")**.

Class Members who miss the Primary Fund Deadline can submit a claim to receive compensation from the smaller, reserve Secondary Fund by filling out and submitting a Class Member Claim Form **no later than September 11, 2028 (the "Secondary Fund Deadline")**. Claims that are filed after **September 11, 2028** may not be eligible for compensation.

The Class Member Claim Form can be found online at https://www.bcchristianbrothersclaims.ca/how-to-claim. If you do not have internet access or a printer, but wish to receive a Class Member Claim Form, please contact the Claims Administrator at 1-800-639-0225.

5. CLAIMS ADMINISTRATOR AND LEGAL FEES

The court has appointed CFM Lawyers LLP as the Claims Administrator to receive and review claims, determine eligibility, assess claims and issue payment to eligible Class Members once approved by the court. The Court has also approved the appointment of Mark Tweedy, K.C. to act as independent assessor in the Claims Process.

CFM Lawyers LLP and Mark Tweedy, K.C. will be available to help with respect to the claims process, its associated forms and appeal processes.

The Claims Administrator's duties will be to the Class as a whole ensuring that the fund is distributed to eligible Class Members in a fair and diligent manner. As Claims Administrator, CFM Lawyers LLP will not be able to provide individual legal advice with respect to a Claimant's claim or assist in the Claim Assessment review process. Claimants requiring legal advice about their claim and/or appealing the Claim Assessment will be required to seek independent legal advice.

Mr. Tweedy's duties will be to conduct assessments of some of the claims and also to review assessments by CFM Lawyers LLP to ensure, to the extent possible, fairness and consistency in the assessment process.

Questions regarding the claims process should be directed to CFM Lawyers LLP at inquiries@bcchristianbrothersclaims.ca or by calling 1-800-639-0225.

You do not need to pay out-of-pocket for the Claims Administrator's assistance with the claims process. The Claims Administrator's fee formed part of the legal fees approved by the court and paid from the settlement fund.

6. QUESTIONS ABOUT THE SETTLEMENTS

More information about the settlement and the claims process is available online at https://www.bcchristianbrothersclaims.ca/, by email at inquiries@bcchristianbrothersclaims.ca or by calling 1-800-639-0225.

7. INTERPRETATION

This notice contains a summary of some of the terms of the settlement agreement and the claims process. If there is a conflict between the provisions of this notice and the settlement agreement and/or the claims process, the terms of the settlement agreement and/or the claims process will apply.