

# Exhibit 3

## Long Form Notice

A NATIONWIDE SETTLEMENT HAS BEEN REACHED IN CANADA TO BENEFIT MANY OWNERS AND LESSEES OF 3.0L VOLKSWAGEN, AUDI AND PORSCHE DIESEL VEHICLES:

IF YOU **OWNED** OR **LEASED** ONE OF THESE VEHICLES ON NOVEMBER 2, 2015  
OR IF YOU **CURRENTLY OWN** ONE OF THESE VEHICLES,  
YOU COULD GET BENEFITS FROM A CLASS ACTION SETTLEMENT

**FOR MORE INFORMATION, VISIT [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) / CALL 1-888-670-4773**

**YOU MAY ALSO CONTACT LAWYERS FOR AFFECTED VEHICLE OWNERS AND LESSEES  
CANADA EXCEPT QUÉBEC AND FRENCH INQUIRIES: 1-866-881-2292 –OR– 1-844-425-2934  
VW / AUDI QUÉBEC AND FRENCH INQUIRIES: 1-888-987-6701  
PORSCHE QUÉBEC AND FRENCH INQUIRIES: 514-451-5500 x401**

A nationwide Settlement in Canada has been reached by Volkswagen with current and certain former owners and lessees of 3.0L Volkswagen, Audi and Porsche diesel vehicles. This 3.0L Settlement must be approved by Courts to become effective.

If approved, Volkswagen has agreed to offer the following benefits under the 3.0L Settlement:

**Cash Payments for nearly 20,000 3.0L diesel vehicles**

—and—

Many owners and lessees will also be entitled to one of the following:

**Vehicle Buyback**  
**Trade-In toward a new or used VW / Audi vehicle**  
**Early Lease Termination**  
**Emissions Compliant Repair with Extended Emissions Warranty by Recall**  
**Reduced Emissions Modification with Extended Emissions Warranty by Recall**

***NOTE: IF YOU SELL YOUR VEHICLE ON OR AFTER JANUARY 17, 2018, YOU WILL LOSE ANY BENEFITS FOR WHICH YOU ARE ELIGIBLE.***

Your rights and options—and the deadlines to exercise them—are explained in this Notice. Additional information is available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) and by calling the Canadian Settlement Claims Centre at 1-888-670-4773.

**PLEASE READ THIS NOTICE CAREFULLY.  
YOUR RIGHTS UNDER THE 3.0L SETTLEMENT ARE AFFECTED EVEN IF YOU DO NOTHING.**

**WHAT THIS NOTICE CONTAINS**

<b>CLASS ACTION QUESTIONS</b> .....	1
A What are my options in the 3.0L Settlement? .....	1
B What are the Class Actions about? .....	2
C Why am I receiving this Notice? .....	2
<b>CLASS MEMBERSHIP QUESTIONS</b> .....	2
D Am I included in the 3.0L Settlement? .....	2
E Is my Generation <u>One</u> or Generation <u>Two</u> vehicle an “Eligible Vehicle”? .....	2
F Am I a “Settlement Class Member”? .....	3
G Is the 3.0L Settlement in Canada the same as in the U.S.? .....	4
H Who is excluded from the 3.0L Settlement? .....	4
<b>SETTLEMENT BENEFIT QUESTIONS</b> .....	5
I What benefits can I receive for my Generation <u>One</u> vehicle? .....	5
J What benefits can I receive for my Generation <u>Two</u> vehicle? .....	7
K How can I make a claim in the 3.0L Settlement? .....	10
L What supporting documents will be needed to make a claim? .....	10
M If I choose a Buyback for my Generation <u>One</u> vehicle, what benefits can I claim? .....	10
N If I choose a Trade-In for my Generation <u>One</u> vehicle, what benefits can I claim? .....	11
O How is the “Vehicle Value” of my Generation <u>One</u> vehicle calculated and when will I know my “Vehicle Value”? .....	12
P How is the “Fair Market Value” of my Generation <u>One</u> vehicle calculated and when will I know my “Fair Market Value”? .....	12
Q Does the physical condition of my Generation <u>One</u> vehicle affect my eligibility for a Buyback or Trade-In? .....	13
R If I choose an Early Lease Termination for my Generation <u>One</u> vehicle, what benefits can I claim? ..	13
S If I choose the Reduced Emissions Modification for my Generation <u>One</u> vehicle, what benefits can I claim? .....	14
T If I receive the Emissions Compliant Repair for my Generation <u>Two</u> vehicle, what benefits can I claim? .....	14
U Why is my Generation <u>Two</u> vehicle not eligible for a Buyback, Trade-In or Early Lease Termination? ..	15
V Can I participate in the 3.0L Settlement if I have a vehicle loan on my Generation <u>One</u> or Generation <u>Two</u> vehicle? .....	15
W Can I receive benefits if my Generation <u>One</u> or Generation <u>Two</u> vehicle was totalled? .....	16
X Can I receive benefits if my Generation <u>One</u> or Generation <u>Two</u> vehicle is not operable? .....	16
<b>APPROVED EMISSIONS MODIFICATION QUESTIONS</b> .....	17
Y What is the Reduced Emissions Modification with Extended Emissions Warranty? .....	17
Z What if there is no Reduced Emissions Modification for my Generation <u>One</u> vehicle? .....	18
AA What is the Emissions Compliant Repair with Extended Emissions Warranty? .....	18
BB How will the Emissions Compliant Repair affect the performance of my Generation <u>Two</u> vehicle? ...	19
<b>SETTLEMENT PROCESS QUESTIONS</b> .....	19
CC If I am a Settlement Class Member, what rights am I giving up? .....	19
DD I have an individual / joinder lawsuit against Volkswagen, Audi or Porsche. What do I need to do to participate in the 3.0L Settlement? .....	20
EE How can I object to the 3.0L Settlement? .....	21
FF How can I opt out of the 3.0L Settlement? .....	22
GG Can I attend the 3.0L Settlement approval hearings? .....	23
HH Who is my lawyer / Class Counsel? .....	24
II How will Class Counsel be paid? .....	24
JJ How do I get more information? .....	24

**CLASS ACTION QUESTIONS**

**A. WHAT ARE MY OPTIONS IN THE 3.0L SETTLEMENT?**

If you think you are included in the 3.0L Settlement, you have the following options:

<b>LEARN MORE ABOUT THE 3.0L SETTLEMENT AND WHETHER YOU MAY BE ELIGIBLE</b>	<p><b>STEP 1:</b> Visit <a href="http://www.VWCanadaSettlement.ca">www.VWCanadaSettlement.ca</a>.</p> <p><b>STEP 2:</b> Determine whether your vehicle is included in the 3.0L Settlement using the Vehicle Look-Up section of the website. You will need your Vehicle Identification Number (“VIN”) for this step (<i>see Question E for more information</i>).</p> <p><b>STEP 3:</b> Determine whether you may be eligible under the 3.0L Settlement, and learn more about the estimated benefits that you may be eligible for, using the Check My Eligibility section of the website.</p>
<b>COURT APPROVAL OF THE 3.0L SETTLEMENT</b>	<p>The nationwide Settlement is subject to approval by Courts. Approval hearings have been scheduled for <b>April 5, 2018</b> before the Ontario Court and <b>April 3, 2018</b> before the Québec Court. These hearings are public and you are welcome to attend at your own cost.</p> <p><i>See Question GG for more information.</i></p>
<b>OBJECT TO THE 3.0L SETTLEMENT BEFORE IT IS APPROVED</b>	<p>If you do not like the 3.0L Settlement, you may provide your views in writing so that they are received by the Notice Administrator by <b>March 19, 2018</b>. Your objection will be delivered to the Courts and considered at the approval hearings. If you are eligible, you will be bound by the 3.0L Settlement if it is approved by the Courts even though you objected to some of its terms.</p> <p><i>See Questions EE and GG for more information.</i></p>
<b>EXCLUDE YOURSELF FROM THE 3.0L SETTLEMENT (OPT OUT) BEFORE IT IS APPROVED</b>	<p>If you do not want to participate in the 3.0L Settlement or be bound by it, you must exclude yourself by opting out. Your opt out request must be received by <b>March 19, 2018</b>. If you opt out, you will <u>not</u> be eligible to receive any benefits under the 3.0L Settlement and you will <u>not</u> be able to object to the 3.0L Settlement, but you <u>will</u> keep any right you have to separately sue Volkswagen, Audi or Porsche at your own cost.</p> <p><i>See Question FF for more information.</i></p>
<b>PARTICIPATE IN THE 3.0L SETTLEMENT</b>	<p>If you wish to make a claim for benefits, you do not need to take any action at this time. The period to submit a claim will not begin until after the 3.0L Settlement is approved by the Courts. If approved, additional details will be provided regarding when and how claims can be submitted.</p> <p><i>See Question K for more information.</i></p>
<b>IF YOU TAKE NO STEPS</b>	<p>If you do not opt out <u>and</u> do not submit a claim during the claims program that will begin after the 3.0L Settlement is approved by the Courts, you will not receive any benefits from the 3.0L Settlement and you will give up any rights you currently have to separately sue Volkswagen, Audi or Porsche for the claims being resolved by the 3.0L Settlement.</p>

**B. WHAT ARE THE CLASS ACTIONS ABOUT?**

The class actions are seeking damages and other relief on behalf of consumers with affected 3.0L diesel vehicles. They allege that these vehicles emit nitrogen oxide (“NOx”) emissions up to levels that exceed the standards to which the vehicles were originally certified because software installed in those vehicles allowed them to operate one way when recognizing driving cycles in NOx emissions laboratory testing, and in a different way when the vehicles were in on-road operation.

These class actions consist of two national class actions (*Matthew Robert Quenneville et al v. Volkswagen Group Canada Inc. et al*, Court File No. CV-15-537029-00CP and *Beckett v. Porsche Cars Canada Ltd. et al*, Court File No. CV-15-543402-CP) before the Ontario Superior Court of Justice and two class actions in Québec (*Option consommateurs v. Volkswagen Group Canada, Inc. et al*, Court File No. 500-06-000761-151 and *Frank-Fort Constructions Inc. v. Porsche Cars Canada, Ltd. et al.*, Court File No. 540-06-000012-155) before the Superior Court of Québec (collectively, the “Class Actions” and the “Courts”). Other consumer proceedings have been commenced and are pending in Canada.

**C. WHY AM I RECEIVING THIS NOTICE?**

This Notice summarizes the 3.0L Settlement, which affects your legal rights if you are a Settlement Class Member (*see Question F*). Receipt of this Notice does not mean that you are a Settlement Class Member.

If you are a Settlement Class Member, this Notice informs you of your legal rights and options. These options include participating in the 3.0L Settlement and, if you wish, objecting to the 3.0L Settlement, or excluding yourself (“opting out”) from the 3.0L Settlement. You can also attend the upcoming public hearings before the Courts, which will determine whether the 3.0L Settlement should be approved (*see Question GG*).

**CLASS MEMBERSHIP QUESTIONS**

**D. AM I INCLUDED IN THE 3.0L SETTLEMENT?**

You may be included in the 3.0L Settlement if:

- You have or had an Eligible Vehicle (*see Question E*); and
- You are a Settlement Class Member (*see Question F*).

**If you sell your vehicle on or after January 17, 2018, you will lose any benefits for which you are eligible.**

Find out if you are included in the 3.0L Settlement and, if so, what benefits you may be entitled to, by reviewing the questions and answers below.

**E. IS MY GENERATION ONE OR GENERATION TWO VEHICLE AN “ELIGIBLE VEHICLE”?**

Only Eligible Vehicles are included in the 3.0L Settlement.

There are two different types (called “Generations”) of affected 3.0L diesel vehicles. Eligible Vehicles are divided into Generation One (model years 2009-2012) and Generation Two (model years 2013-2016) vehicles. The benefits available under the 3.0L Settlement depend upon whether an Eligible Vehicle is a Generation One or Generation Two vehicle.

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**OFFICIAL COURT COMMUNICATION**

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If your vehicle meets the following criteria, it may be considered an Eligible Vehicle:

- It must be one of the following affected 3.0L Volkswagen, Audi or Porsche diesel vehicles:

<b>GENERATION ONE</b>		<b>GENERATION TWO</b>	
<b>Diesel Model</b>	<b>Model Years</b>	<b>Diesel Model</b>	<b>Model Years</b>
VW Touareg	2009-2012	VW Touareg	2013-2016
Audi Q7	2009-2012	Audi Q5	2014-2016
		Audi Q7	2013-2015
		Audi A6	2014-2016
		Audi A7	2014-2016
		Audi A8, A8L	2014-2016
		Porsche Cayenne	2013-2016

- It must have been originally (a) sold in Canada, or (b) leased in Canada from VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) (“VCCI”) or Porsche Financial Services Canada, Inc. (“PFSC”);
- It must have been registered in Canada at any point between November 2, 2015 and January 17, 2018, or registered in the United States during the entire period from November 2, 2015 through January 17, 2018; and
- It must not already have received the Emissions Compliant Repair for Generation Two vehicles (*see Question AA*) or Reduced Emissions Modification for Generation One vehicles (*see Question Y*), unless completed by you through a VW, Audi or Porsche recall.

You can enter your Vehicle Identification Number, also known as a VIN, in the Vehicle Look-Up section at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) to determine if your vehicle is included in the 3.0L Settlement. Additional eligibility requirements apply in order to participate in the 3.0L Settlement.

A VIN is a unique identification number for a vehicle. It contains a combination of 17 numbers and letters. You can find it on your provincial vehicle registration, vehicle insurance card or the vehicle itself—either on the driver’s side of the dashboard at the bottom of the windshield or on the driver’s side door jamb. A VIN will never include the letter ‘i’ or the letter ‘o’, but may include the number ‘1’ or the number ‘0’.

**F. AM I A “SETTLEMENT CLASS MEMBER”?**

You may be a Settlement Class Member and included in the 3.0L Settlement if:

- You were the owner of an Eligible Vehicle on November 2, 2015; or
- On November 2, 2015, you were a lessee of an Eligible Vehicle leased from VCCI or PFSC; or
- You purchased an Eligible Vehicle after November 2, 2015 and continue to own the vehicle at the time of participating in the 3.0L Settlement.

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**OFFICIAL COURT COMMUNICATION**

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Some exceptions apply (see *Question H*).

There are four categories of Settlement Class Members who may be entitled to benefits under the 3.0L Settlement if they submit a claim during the claims program:

<b>Eligible Owners:</b>	Eligible Owners are Settlement Class Members who owned an Eligible Vehicle on November 2, 2015 and continue to own the vehicle at the time of participating in the 3.0L Settlement.
	Settlement Class Members who owned an Eligible Vehicle on November 2, 2015 and transfer title to an insurance company on or after January 17, 2018 because their vehicle was totalled or appraised as a total loss are also Eligible Owners (see <i>Question W</i> ).
<b>Eligible Lessees:</b>	Eligible Lessees are Settlement Class Members who were leasing an Eligible Vehicle from VCCI or PFSC as of November 2, 2015.
	Such lessees qualify as Eligible Lessees regardless of whether they continue to be in their lease, their lease has since concluded at lease-end or been transferred to someone else, or if they buy out their leased vehicle at lease-end.
<b>Eligible Purchasers:</b>	Eligible Purchasers are Settlement Class Members who purchased an Eligible Vehicle after November 2, 2015, and continue to own the vehicle at the time of participating in the 3.0L Settlement.
	Eligible Purchasers do not include Eligible Lessees who buy out their leased vehicle at lease-end.
<b>Eligible Sellers:</b>	Eligible Sellers are Settlement Class Members who owned an Eligible Vehicle on November 2, 2015 and sell their vehicle before January 17, 2018.
	Eligible Sellers include those Settlement Class Members who transfer title to an insurance company before January 17, 2018 because their vehicle was totalled or appraised as a total loss (see <i>Question W</i> ).

You can answer the questions in the Check My Eligibility section at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) to help you determine whether one of these categories of Settlement Class Members applies to you and, if so, the estimated benefits to which you may be entitled.

**G. IS THE 3.0L SETTLEMENT IN CANADA THE SAME AS IN THE U.S.?**

No. The 3.0L Settlement in Canada is specific to Eligible Vehicles that were originally (a) sold in Canada, or (b) leased in Canada from VCCI or PFSC. Owners or lessees of 3.0L VW, Audi or Porsche vehicles originally sold or leased in the U.S. may be eligible to claim in the U.S. settlement. Visit [www.vwcourtsettlement.com](http://www.vwcourtsettlement.com) for more information on the U.S. settlement.

**H. WHO IS EXCLUDED FROM THE 3.0L SETTLEMENT?**

The Settlement Agreement does not apply to anyone who is not a Settlement Class Member, including Excluded Persons. Excluded Persons are:

**Volkswagen / Audi / Porsche 3.0L Diesel Emissions Settlement in Canada**  
**OFFICIAL COURT COMMUNICATION**

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- All those who timely and properly exclude themselves (opt out) from the 3.0L Settlement (see *Question FF*);
- Anyone who owned an Eligible Vehicle on November 2, 2015 and sells the vehicle after January 17, 2018 other than through the Buyback and Trade-In options under the 3.0L Settlement, except for those owners who transfer title to an insurance company because the Eligible Vehicle was totalled or appraised as a total loss (see *Question W*);
- Insurance companies and other owners of totalled Eligible Vehicles;
- Any lessees of an Eligible Vehicle leased from a leasing company other than VCCI or PFSC;
- Anyone who owns an Eligible Vehicle with a branded title of “Dismantled”, “Junk”, “Salvage” or “Mechanically Unfit” on November 2, 2015;
- Anyone who owns an Eligible Vehicle that was acquired from a junkyard or salvage yard on or after November 2, 2015;
- Volkswagen’s, Audi’s and Porsche’s officers, directors and employees; participants in Volkswagen’s or Audi’s internal lease program or the Porsche Associate Lease Program; Volkswagen’s, Audi’s and Porsche’s affiliates and those affiliates’ officers, directors and employees; and Volkswagen, Audi or Porsche dealers and those dealers’ directors or officers;
- The Judges overseeing the Class Actions; and
- Class Counsel in the Class Actions who represent the 3.0L Settlement Class Members.

## **SETTLEMENT BENEFITS QUESTIONS**

### **I. WHAT BENEFITS CAN I RECEIVE FOR MY GENERATION ONE VEHICLE?**

The 3.0L Settlement provides for various benefits to owners and lessees of Generation One vehicles (see *Question E*) depending on their circumstances.

The cash payment amount and benefit options that may be available to you depend upon whether you are an Eligible Owner, Eligible Seller, Eligible Purchaser or Eligible Lessee (see *Question F*) and upon whether your Eligible Vehicle was under lease to someone else on November 2, 2015.

#### **Eligible Owners of Generation One Eligible Vehicles**

If you are an **Eligible Owner** who owned a **Generation One** vehicle on November 2, 2015 and continue to own the vehicle when you participate in the claims program, the benefits you can receive depend upon whether you choose the **Buyback**, **Trade-In** or the **Reduced Emissions Modification with Extended Emissions Warranty**. You may have additional options if your vehicle is totalled (see *Question W*) or ceases to be operable (see *Question X*). With each of these options, you will receive a **cash payment** as shown in Table A below based on your vehicle’s make, model and model year:



**Table A**  
**Cash Payments to Eligible Owners of Generation One vehicles**

Model Year	VW Touareg	Audi Q7
2009	\$8,875.00	\$9,350.00
2010	\$9,500.00	\$9,850.00
2011	\$9,775.00	\$10,575.00
2012	\$10,450.00	\$12,600.00

**Eligible Sellers of Generation One Eligible Vehicles**

If you are an **Eligible Seller** who owned a **Generation One** vehicle on November 2, 2015 and you sold the vehicle or otherwise transferred its ownership before January 17, 2018, you can receive a **cash payment** as shown in Table B below based on your vehicle's make, model and model year:

**Table B**  
**Cash Payments to Eligible Sellers of Generation One vehicles**

Model Year	VW Touareg	Audi Q7
2009	\$4,437.50	\$4,675.00
2010	\$4,750.00	\$4,925.00
2011	\$4,887.50	\$5,287.50
2012	\$5,225.00	\$6,300.00

**Eligible Purchasers of Generation One Eligible Vehicles**

If you are an **Eligible Purchaser** who acquired your **Generation One** vehicle after November 2, 2015 and continue to own the vehicle when you participate in the claims program, by receiving the **Reduced Emissions Modification with Extended Emissions Warranty** through a recall, you are entitled to receive a **cash payment** as shown in Table C below based on your vehicle's make, model and model year. The amount of the cash payment also depends upon whether your vehicle was previously under lease from VCCI to someone else on November 2, 2015. If it was not under lease, you are eligible for a cash payment as shown in column A of Table C. If it was under lease, you are eligible for a half cash payment as shown in column B of Table C. To determine whether this applies to your vehicle, visit [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) and enter your VIN in the Vehicle Look-Up section. You may have an additional option if your vehicle ceases to be operable (*see Question X*).

**Table C**  
**Cash Payments to Eligible Purchasers of Generation One vehicles**

Model Year	VW Touareg		Audi Q7	
	A	B	A	B
2009	\$4,437.50	\$2,218.75	\$4,675.00	\$2,337.50
2010	\$4,750.00	\$2,375.00	\$4,925.00	\$2,462.50
2011	\$4,887.50	\$2,443.75	\$5,287.50	\$2,643.75
2012	\$5,225.00	\$2,612.50	\$6,300.00	\$3,150.00

**Eligible Lessees of Generation One Eligible Vehicles**

If you are an **Eligible Lessee** who, on November 2, 2015, was leasing a Generation One vehicle from VCCI, the benefits you can receive depend upon whether your lease has concluded or remains active, and upon whether you purchase and continue to own your leased vehicle, when you participate in the claims program.

In particular, if your lease has ended or been transferred to someone else when you participate in the claims program, you can receive a **cash payment** as shown in column A of Table D based on your vehicle's make, model and model year. If your lease remains active when you participate in the claims program, you can choose an **Early Lease Termination** or the **Reduced Emissions Modification with Extended Emissions Warranty**. With each of these options, you will receive a **cash payment** as shown in column A of Table D.

In the event that you purchase your vehicle at the conclusion of your lease and continue to own your vehicle when you participate in the claims program, if you receive the **Reduced Emissions Modification with Extended Emissions Warranty** through a recall, you are entitled to receive a **cash payment** as shown in column A of Table D. You may have an additional option if your vehicle ceases to be operable (*see Question X*). If you sell your vehicle before receiving the Reduced Emissions Modification, you are entitled to a **cash payment** as shown in column B of Table D.

**Table D**  
**Cash Payments to Eligible Lessees of Generation One vehicles**

Model Year	VW Touareg		Audi Q7	
	A	B	A	B
2009	\$4,437.50	\$2,218.75	\$4,675.00	\$2,337.50
2010	\$4,750.00	\$2,375.00	\$4,925.00	\$2,462.50
2011	\$4,887.50	\$2,443.75	\$5,287.50	\$2,643.75
2012	\$5,225.00	\$2,612.50	\$6,300.00	\$3,150.00

**J. WHAT BENEFITS CAN I RECEIVE FOR MY GENERATION TWO VEHICLE?**

The 3.0L Settlement provides for the cash payments described in this question. The cash payment amount that may be available to you depends upon whether you are an Eligible Owner, Eligible Seller, Eligible Purchaser or Eligible Lessee (*see Question F*) and upon whether your Eligible Vehicle was under lease to someone else on November 2, 2015. If you are in possession of your Generation Two vehicle, you must receive the Emissions Compliant Repair in order to claim your cash payment.

**Eligible Owners of Generation Two Eligible Vehicles**

If you are an **Eligible Owner** who owned a **Generation Two** vehicle on November 2, 2015 and continue to own the vehicle when you participate in the claims program, by receiving the **Emissions Compliant Repair with Extended Emissions Warranty** through a recall, you are entitled to receive a **cash payment** as shown in Table E below based on your vehicle's make, model and model year. You may have additional options if your vehicle is totalled (*see Question W*) or ceases to be operable (*see Question X*).

**Table E**  
**Cash Payments to Eligible Owners of Generation Two vehicles**

<b>Make &amp; Model</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
<b>VW Touareg</b>	\$6,525.00	\$7,025.00	\$7,525.00	\$7,775.00
<b>Audi Q5</b>	N/A	\$7,325.00	\$7,500.00	\$7,700.00
<b>Audi Q7</b>	\$7,025.00	\$7,625.00	\$7,925.00	N/A
<b>Audi A6</b>	N/A	\$7,525.00	\$8,125.00	\$8,725.00
<b>Audi A7</b>	N/A	\$8,425.00	\$9,025.00	\$9,725.00
<b>Audi A8, A8L</b>	N/A	\$9,950.00	\$10,225.00	\$11,025.00
<b>Porsche Cayenne</b>	\$7,875.00	\$8,525.00	\$9,125.00	\$9,325.00

**Eligible Sellers of Generation Two Eligible Vehicles**

If you are an **Eligible Seller** who owned a **Generation Two** vehicle on November 2, 2015 and you sold the vehicle or otherwise transferred its ownership before January 17, 2018, you can receive a **cash payment** as shown in Table F below based on your vehicle's make, model and model year:

**Table F**  
**Cash Payments to Eligible Sellers of Generation Two vehicles**

<b>Make &amp; Model</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
<b>VW Touareg</b>	\$3,262.50	\$3,512.50	\$3,762.50	\$3,887.50
<b>Audi Q5</b>	N/A	\$3,662.50	\$3,750.00	\$3,850.00
<b>Audi Q7</b>	\$3,512.50	\$3,812.50	\$3,962.50	N/A
<b>Audi A6</b>	N/A	\$3,762.50	\$4,062.50	\$4,362.50
<b>Audi A7</b>	N/A	\$4,212.50	\$4,512.50	\$4,862.50
<b>Audi A8, A8L</b>	N/A	\$4,975.00	\$5,112.50	\$5,512.50
<b>Porsche Cayenne</b>	\$3,937.50	\$4,262.50	\$4,562.50	\$4,662.50

**Eligible Purchasers of Generation Two Eligible Vehicles**

If you are an **Eligible Purchaser** who acquired your **Generation Two** vehicle after November 2, 2015 and continue to own the vehicle when you participate in the claims program, by receiving the **Emissions Compliant Repair with Extended Emissions Warranty** through a recall, you are entitled to receive a **cash payment** as shown in Table G below based on your vehicle's make, model and model year. The amount of the cash payment also depends upon whether your vehicle was previously under lease from VCCI or PFSC to someone else on November 2, 2015. If it was not under lease, you are eligible for a cash payment as shown in column A of Table G. If it was under lease, you are eligible for a cash payment of \$1,000 as shown in column B of Table G. To determine whether this applies to your vehicle, visit [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) and enter your VIN in the Vehicle Look-Up section. You may have an additional option if your vehicle ceases to be operable (see *Question X*).

**Table G**  
**Cash Payments to Eligible Purchasers of Generation Two vehicles**

Make & Model	2013		2014		2015		2016	
	A	B	A	B	A	B	A	B
<b>VW Touareg</b>	\$3,262.50	\$1,000.00	\$3,512.50	\$1,000.00	\$3,762.50	\$1,000.00	\$3,887.50	\$1,000.00
<b>Audi Q5</b>	N/A	N/A	\$3,662.50	\$1,000.00	\$3,750.00	\$1,000.00	\$3,850.00	\$1,000.00
<b>Audi Q7</b>	\$3,512.50	\$1,000.00	\$3,812.50	\$1,000.00	\$3,962.50	\$1,000.00	N/A	N/A
<b>Audi A6</b>	N/A	N/A	\$3,762.50	\$1,000.00	\$4,062.50	\$1,000.00	\$4,362.50	\$1,000.00
<b>Audi A7</b>	N/A	N/A	\$4,212.50	\$1,000.00	\$4,512.50	\$1,000.00	\$4,862.50	\$1,000.00
<b>Audi A8, A8L</b>	N/A	N/A	\$4,975.00	\$1,000.00	\$5,112.50	\$1,000.00	\$5,512.50	\$1,000.00
<b>Porsche Cayenne</b>	\$3,937.50	\$1,000.00	\$4,262.50	\$1,000.00	\$4,562.50	\$1,000.00	\$4,662.50	\$1,000.00

**Eligible Lessees of Generation Two Eligible Vehicles**

If you are an **Eligible Lessee** who was leasing a **Generation Two** vehicle from VCCI or PFSC as of November 2, 2015, the benefits you can receive depend upon whether your lease has concluded or remains active, and upon whether you purchase and continue to own your leased vehicle, when you participate in the claims program.

In particular, if your lease has ended or been transferred to someone else when you participate in the claims program, you can receive a **cash payment of \$2,000** as shown in column A of Table H. If your lease remains active when you participate in the claims program, by receiving the **Emissions Compliant Repair with Extended Emissions Warranty** through a recall, you are entitled to a **cash payment of \$2,000** as shown in column A of Table H.

In the event that you purchase your vehicle at the conclusion of your lease and continue to own your vehicle when you participate in the settlement agreement, by receiving the **Emissions Compliant Repair with Extended Emissions Warranty** through a recall, you are entitled to receive a **cash payment of \$2,000** as shown in column A of Table H. You may have an additional option if your vehicle ceases to be operable (*see Question X*). If you sell your vehicle before receiving the Emissions Compliant Repair, you are entitled to a **cash payment of \$1,000** as shown in column B of Table H.

**Table H**  
**Cash Payments to Eligible Lessees of Generation Two vehicles**

Brand & Model	2013		2014		2015		2016	
	A	B	A	B	A	B	A	B
<b>VW Touareg</b>	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00
<b>Audi Q5</b>	N/A	N/A	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00
<b>Audi Q7</b>	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	N/A	N/A
<b>Audi A6</b>	N/A	N/A	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00
<b>Audi A7</b>	N/A	N/A	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00
<b>Audi A8, A8L</b>	N/A	N/A	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00
<b>Porsche Cayenne</b>	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00	\$2,000.00	\$1,000.00

**K. HOW CAN I MAKE A CLAIM IN THE 3.0L SETTLEMENT?**

If you wish to make a claim for benefits under the 3.0L Settlement, you do not need to take any action at this time. The claims program will not begin until after the 3.0L Settlement is approved by the Courts (see *Question GG*). If the 3.0L Settlement is approved, notice and additional details will be provided regarding when claims can begin to be submitted and the steps you will need to take to make a claim. You will have until **May 31, 2019** to submit a claim and, if eligible, until **August 31, 2019** to obtain your Settlement benefits.

**L. WHAT SUPPORTING DOCUMENTS WILL BE NEEDED TO MAKE A CLAIM?**

To submit a claim for benefits under the 3.0L Settlement (if approved by the Courts), you will need to provide the following information and supporting documents:

- Valid driver's license or other government-issued photo identification;
- Dates you owned or leased your vehicle; and
- Proof of vehicle ownership (in the case of an owned vehicle, a copy of the vehicle's registration certificate or bill of sale, and in the case of a vehicle leased from VCCI or PFSC, a copy of the lease agreement).

Additional documentation may be required to verify your eligibility for benefits depending on the nature of your claim. Once your claim is submitted, the Claims Administrator will provide a list of all required documentation.

**M. IF I CHOOSE A BUYBACK FOR MY GENERATION ONE VEHICLE, WHAT BENEFITS CAN I CLAIM?**

If you choose a Buyback, Volkswagen will offer to buy back your Generation One vehicle at its Vehicle Value (see *Question O*) and provide an additional cash payment based on your Settlement Class Member category (see *Question I*). The total payment can be estimated by the "Total" amount set forth for your vehicle's make, model and model year in Table 2 to Exhibit 5 of the 3.0L Settlement (available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca)). Your actual payment may be adjusted up or down depending on your vehicle's mileage at the time you surrender your vehicle as part of the claims program.

To receive a Buyback, you must arrange to resolve any outstanding loans on your vehicle and unpaid Québec traffic tickets and fines before it is surrendered. To assist with satisfying any outstanding loans on your vehicle, some or all of your Vehicle Value and additional cash payment may, if directed by you, be paid by Volkswagen to your lender(s). If available, loan forgiveness provides additional assistance to owners who owe more on their vehicle than they will receive as Vehicle Value plus the additional cash payment (see *Question V*). You will be responsible for payment of any loan balance not satisfied by payments made by Volkswagen.

Buybacks will take place at authorized dealerships located in Canada except that, if your Eligible Vehicle is registered in the U.S., you may complete your Buyback at an authorized dealership located in the U.S. In either case, all Buybacks of a Volkswagen vehicle must take place at an authorized Volkswagen dealership, and all Buybacks of an Audi vehicle must take place at an authorized Audi dealership. If the 3.0L Settlement is approved, additional details will be provided regarding the claims process for Settlement Class Members with Eligible Vehicles registered in the

U.S. who purchased their vehicle in Canada.

Settlement Class Members in possession of their Generation One vehicle are entitled to a free AdBlue® refill and free oil change when they receive an offer for a Buyback.

After completing a Buyback of a Generation One vehicle, Eligible Owners (*see Question F*) are entitled to a refund for unused portions of any (1) mechanical breakdown protection contracts, and (2) Audi Care Prepaid Maintenance contracts, for their vehicle if purchased before January 17, 2018 from an authorized Volkswagen or Audi dealer in Canada. Any applicable refunds will need to be claimed within 90 days of completing a Buyback before the May 31, 2019 claims submission deadline, and within 60 days of completing a Buyback thereafter (even if the 60-day period extends past the August 31, 2019 deadline for the claims program). Additional details will be provided regarding the process for submitting these claims.

**N. IF I CHOOSE A TRADE-IN FOR MY GENERATION ONE VEHICLE, WHAT BENEFITS CAN I CLAIM?**

If you choose to trade in your Generation One vehicle towards the purchase of a new Volkswagen or Audi, or any used Volkswagen Group brand vehicle, from an authorized Volkswagen or Audi dealership in Canada, the purchase price of the vehicle you are buying will be reduced by the Fair Market Value of your vehicle at the time of the Trade-In (*see Question P*). This will reduce the taxable portion that must be paid on the replacement vehicle. In addition, you will receive a cash payment equal to the difference between your vehicle's Vehicle Value (*see Question O*) and Fair Market Value, plus an additional cash payment based on your Settlement Class Member category (*see Question I*).

In addition to the tax reduction, the total value of the Trade-In can be estimated by the "Total" amount set forth for your vehicle's make, model and model year in Table 2 to Exhibit 5 of the 3.0L Settlement (available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca)). Since the Trade-In involves applying the Fair Market Value towards the purchase of a replacement vehicle, the takeaway cash payment of a Trade-In can be estimated by this "Total" amount less your vehicle's Fair Market Value. Your actual cash payment may be adjusted up or down depending on market conditions and your vehicle's mileage at the time of surrendering your vehicle as part of the claims program.

To receive a Trade-In, you must arrange to resolve any outstanding loans on your vehicle and unpaid Québec traffic tickets and fines before it is surrendered. To assist with satisfying any outstanding loans on your vehicle, some or all of your Vehicle Value, less your vehicle's Fair Market Value, and additional cash payment may, if directed by you, be paid by Volkswagen to your lender(s). If available, loan forgiveness provides additional assistance to owners who owe more on their vehicle than they will receive as Vehicle Value plus the additional cash payment (*see Question V*). You will be responsible for payment of any loan balance not satisfied by payments made by Volkswagen.

All Trade-Ins must take place at an authorized Volkswagen or Audi dealership in Canada. If the 3.0L Settlement is approved, additional details will be provided regarding the claims process for Settlement Class Members with Eligible Vehicles registered in the U.S. who purchased their vehicle in Canada.

Settlement Class Members in possession of their Generation One vehicle are entitled to a free AdBlue® refill and free oil change when they receive an offer for a Trade-In.

After completing a Trade-In of a Generation One vehicle, Eligible Owners (see *Question F*) are entitled to a refund for unused portions of any (1) mechanical breakdown protection contracts, and (2) Audi Care Prepaid Maintenance contracts, for their vehicle if purchased before January 17, 2018 from an authorized Volkswagen or Audi dealer in Canada. Any applicable refunds will need to be claimed within 90 days of completing a Trade-In before the May 31, 2019 claims submission deadline, and within 60 days of completing a Trade-In thereafter (even if the 60-day period extends past the August 31, 2019 deadline for the claims program). Additional details will be provided regarding the process for submitting these claims.

**O. HOW IS THE “VEHICLE VALUE” OF MY GENERATION ONE VEHICLE CALCULATED AND WHEN WILL I KNOW MY “VEHICLE VALUE”?**

If you choose a Buyback or Trade-In of your Generation One vehicle, the Vehicle Value is determined from your vehicle’s **wholesale value on November 2, 2015** (with no regional adjustment) as independently reported by Canadian Black Book® Inc. (“CBB”), and using your vehicle’s condition category at the time of the Buyback or Trade-In.

CBB establishes mileage thresholds for its vehicle condition categories. Those thresholds change periodically and, as a result, a vehicle may change condition categories during the claims period. The higher a vehicle’s mileage, the lower the condition category and the lower the wholesale value.

Estimated ranges of possible Vehicle Values for Generation One vehicles by make, model and model year are available in Table 2 to Exhibit 5 of the 3.0L Settlement (available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca)). You can also consult the Vehicle Value Estimator that will be available until the claims process begins at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) for an estimate of the Vehicle Value for your vehicle. The Vehicle Value Estimator provides an estimated valuation based on the mileage you enter and CBB’s mileage thresholds (the “Condition Categories”) at the time when you consult the Vehicle Value Estimator.

Please keep in mind that the Vehicle Value Estimator’s valuations are presented as an estimate for informational purposes only and do not constitute a claim or offer for benefits under the 3.0L Settlement. If you are eligible and submit a claim when the claims program is in place, you will receive an updated estimate of your Vehicle Value from the Claims Administrator with your offer for a Buyback or Trade-In.

Your Vehicle Value will be based on your vehicle’s condition category according to its mileage approximately 20 days before the Buyback or Trade-In, provided that the mileage does not increase by more than 2,000 kilometres when you bring your vehicle into an authorized Volkswagen or Audi dealership. If your vehicle’s mileage exceeds this allowance, your Buyback or Trade-In will need to be rescheduled and your Vehicle Value may change.

Although the Vehicle Value is specific to your vehicle’s mileage at a future date, and will be determined by the Claims Administrator, it can be estimated using the “Vehicle Value Estimator” that is available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca).

**P. HOW IS THE “FAIR MARKET VALUE” OF MY GENERATION ONE VEHICLE CALCULATED AND WHEN WILL I KNOW MY “FAIR MARKET VALUE”?**

If you choose a Trade-In of your Generation One vehicle, the Fair Market Value is determined from your vehicle’s **wholesale value at the time of the Trade-In** (with no regional adjustment) as independently reported by Canadian Black Book® Inc. (“CBB”), and using your vehicle’s condition

category at the time of the Trade-In.

CBB establishes mileage thresholds for its vehicle condition categories. Those thresholds change periodically and, as a result, a vehicle may change condition categories during the claims period. The higher a vehicle's mileage, the lower the condition category and the lower the wholesale value.

The Fair Market Value will be based on your vehicle's condition category according to its mileage approximately 20 days before the Trade-In, provided that the mileage does not increase by more than 2,000 kilometres when you bring your vehicle into an authorized Volkswagen or Audi dealership. If your vehicle's mileage exceeds this allowance, your Trade-In will need to be rescheduled and your Fair Market Value may change.

Because the Fair Market Value will be determined from market conditions and your vehicle's mileage at a future date, it cannot be accurately assessed at this time. Your Fair Market Value will be determined by the Claims Administrator.

**Q. DOES THE PHYSICAL CONDITION OF MY GENERATION ONE VEHICLE AFFECT MY ELIGIBILITY FOR A BUYBACK OR TRADE-IN?**

Provided your Generation One vehicle is Operable (see *Question X*), and except for mileage, the physical condition of your vehicle does not affect its Vehicle Value (see *Question O*) or Fair Market Value (see *Question P*) as long as any damage is due to normal wear and tear or accidental damage.

Vehicles that have undergone intentional physical or mechanical stripping or removal of any Volkswagen or Audi equipment or parts prior to participation in the claims program, will be either ineligible for the Buyback or Trade-In, or eligible only for reduced compensation.

The following acts, among others, may prevent owners of a Generation One vehicle from obtaining some or all of the Buyback and Trade-In benefits under the 3.0L Settlement: (1) removal of any Volkswagen or Audi equipment or parts including, but not limited to, removal of lights, wheel covers, navigation systems or radios, (2) permanent alteration of the vehicle's appearance, such as by painting, keying or drawing in a manner that negatively affects the vehicle's resale value, and/or (3) modification of the vehicle's components in a way that alters or affects the vehicle's performance.

The Claims Administrator will be the decision maker on whether a vehicle is ineligible, or eligible only for reduced compensation.

**R. IF I CHOOSE AN EARLY LEASE TERMINATION FOR MY GENERATION ONE VEHICLE, WHAT BENEFITS CAN I CLAIM?**

If you are actively leasing a Generation One vehicle from VCCI and choose an Early Lease Termination, you can terminate your lease from VCCI before the end of the lease term without any early termination penalty and receive a cash payment (see *Question I at Table D, column A*). To obtain this benefit, you will need to pay any delinquent balance, along with any other fees due, pursuant to the terms of the lease. All Early Lease Terminations must take place at an authorized Volkswagen or Audi dealership in Canada.

Settlement Class Members in possession of their Generation One vehicle are entitled to a free AdBlue® refill and free oil change when they receive an offer for an Early Lease Termination.



**S. IF I CHOOSE THE REDUCED EMISSIONS MODIFICATION FOR MY GENERATION ONE VEHICLE, WHAT BENEFITS CAN I CLAIM?**

There will be a Reduced Emissions Modification (see *Question Y*) only if a modification of the emissions system for your Generation One vehicle is approved by the U.S. Environmental Protection Agency (Volkswagen Group continues to work with U.S. regulators to develop Reduced Emissions Modifications for model year 2009-2012 Generation One vehicles), and is available through a VW or Audi recall in Canada.

If there is a Reduced Emissions Modification, Settlement Class Members in possession of their Generation One vehicle can choose the Reduced Emissions Modification with Extended Emissions Warranty to receive a substantial cash payment in the 3.0L Settlement (see *Question I*).

If approved and available, you can choose to receive the Reduced Emissions Modification through the recall before the claims program begins (see *Question K*) and there will be no impact on the choice of eligible benefits available to you under the 3.0L Settlement. However, receiving the Reduced Emissions Modification through the recall after the claims program begins will eliminate any rights that you may have to choose a Buyback (see *Question M*), Trade-In (see *Question N*) or Early Lease Termination (see *Question R*) in the 3.0L Settlement.

The Reduced Emissions Modification can be obtained at authorized dealerships located in Canada except that, if your vehicle is registered in the U.S., you may receive the Reduced Emissions Modification at an authorized dealership located in the U.S. In either case, the Reduced Emissions Modification for a Volkswagen vehicle can be obtained only from a Volkswagen dealership, and the Reduced Emissions Modification for an Audi vehicle can be obtained only from an Audi dealership. If the 3.0L Settlement is approved, additional details will be provided regarding the claims process for Settlement Class Members with Eligible Vehicles registered in the U.S. who purchased their vehicle in Canada.

Settlement Class Members in possession of their Generation One vehicle are entitled to a free AdBlue<sup>®</sup> refill and free oil change when they receive an offer for the Reduced Emissions Modification option.

In the event that a Reduced Emissions Modification for your Generation One vehicle is not available by recall in Canada by **September 14, 2018**, the benefit options that you will be able to choose will depend upon your circumstances or you may be able to choose to opt out of the 3.0L Settlement at any time between September 15, 2018 and November 15, 2018 (see *Question Z*).

**T. IF I RECEIVE THE EMISSIONS COMPLIANT REPAIR FOR MY GENERATION TWO VEHICLE, WHAT BENEFITS CAN I CLAIM?**

The U.S. Environmental Protection Agency has approved an Emissions Compliant Repair (see *Question AA*) for all model year 2013-2016 Generation Two vehicles, which brings those vehicles into full compliance with the emissions standards to which they were originally certified. Notice will be provided when the recalls for the Emissions Compliant Repair launch in Canada and are available at authorized dealerships.

Settlement Class Members in possession of their Generation Two vehicle can obtain the Emissions Compliant Repair with Extended Emissions Warranty to receive a substantial cash payment in the 3.0L Settlement (see *Question J*).

You can choose to receive the Emissions Compliant Repair through the recall before the claims program begins (*see Question K*) without losing any right to claim the cash payment available to you in the 3.0L Settlement.

The Emissions Compliant Repair can be obtained at authorized dealerships located in Canada except that, if your vehicle is registered in the U.S., you may complete the Emissions Compliant Repair at an authorized dealership located in the U.S. In either case, the Emissions Compliant Repair for a Volkswagen vehicle can be obtained only from a Volkswagen dealership, the Emissions Compliant Repair for an Audi vehicle can be obtained only from an Audi dealership, and the Emissions Compliant Repair for a Porsche vehicle can be obtained only from a Porsche dealership. If the 3.0L Settlement is approved, additional details will be provided regarding the claims process for Settlement Class Members with Eligible Vehicles registered in the U.S. who purchased their vehicle in Canada.

**U. WHY IS MY GENERATION TWO VEHICLE NOT ELIGIBLE FOR A BUYBACK, TRADE-IN OR EARLY LEASE TERMINATION?**

In the case of Generation Two vehicles, the U.S. Environmental Protection Agency (EPA) has approved an Emissions Compliant Repair (*see Question AA*) that brings those vehicles into full compliance with the emissions standards to which they were originally certified.

In the case of Generation One vehicles, they cannot practically be brought into compliance with the emissions standards to which they were originally certified. That is why, if eligible, owners and lessees can choose instead among a Buyback or Trade-In (for owners, *see Questions M and N*) or an Early Lease Termination (for lessees, *see Question R*), or, if approved by the U.S. EPA, a Reduced Emissions Modification with Extended Emissions Warranty (*see Question Y*).

**V. CAN I PARTICIPATE IN THE 3.0L SETTLEMENT IF I HAVE A VEHICLE LOAN ON MY GENERATION ONE OR GENERATION TWO VEHICLE?**

Yes. However, if you have a Generation One vehicle and are receiving a Buyback or Trade-In, or you have a Generation One or Generation Two vehicle that you are surrendering for inoperability, you must arrange to resolve any outstanding loans on your vehicle and unpaid Québec traffic tickets and fines before it is surrendered.

To assist with paying down any outstanding loans on your vehicle, you will have the opportunity to direct Volkswagen to pay some or all of your cash payment benefits directly to your lender(s). You will be responsible for payment of any loan balance not satisfied by payments made by Volkswagen.

If available, loan forgiveness provides additional assistance to Settlement Class Members with a Generation One vehicle who choose a Buyback or Trade-In and who owe more on their vehicle than they will receive as Vehicle Value plus the additional cash payment based on their Settlement Class Member category. Loan forgiveness will be available to such Settlement Class Members if a Reduced Emissions Modification for their Generation One vehicle is not available by recall in Canada by **September 14, 2018**.

In such circumstances, Settlement Class Members will qualify for a loan forgiveness payment up to a maximum of 30% of the sum of their Vehicle Value and additional cash payment payable towards satisfaction of the loan on their vehicle, with certain exceptions. If the loan forgiveness payment is not sufficient to pay down the loan, the Settlement Class Member must arrange to resolve any remaining balance in order to receive a Buyback or Trade-In.

To learn more about loan forgiveness, please contact the Canadian Settlement Claims Centre by calling 1-888-670-4773.

**W. CAN I RECEIVE BENEFITS IF MY GENERATION ONE OR GENERATION TWO VEHICLE WAS TOTALLED?**

If you were the owner of a Generation One or Generation Two vehicle on November 2, 2015 and your vehicle was subsequently totalled and the title was transferred to an insurance company before January 17, 2018, you may be an Eligible Seller and can receive a cash payment. In the case of a Generation One vehicle, you can receive a cash payment as shown in Table B of Question I based on your vehicle's make, model and model year. In the case of a Generation Two vehicle, you can receive a cash payment as shown in Table F of Question J based on your vehicle's make, model and model year.

Alternatively, if you were the owner of a Generation One or Generation Two vehicle on November 2, 2015 and your vehicle is subsequently totalled and the title is transferred to an insurance company on or after January 17, 2018, you may be an Eligible Owner and can receive a cash payment. In the case of a Generation One vehicle, you can receive a cash payment as shown in Table A of Question I based on your vehicle's make, model and model year. In the case of a Generation Two vehicle, you can receive a cash payment as shown in Table E of Question J based on your vehicle's make, model and model year.

**X. CAN I RECEIVE BENEFITS IF MY GENERATION ONE OR GENERATION TWO VEHICLE IS NOT OPERABLE?**

In order for Settlement Class Members to receive a Buyback, Trade-In, or Reduced Emissions Modification or Emissions Compliant Repair, their vehicle must be operable when brought in to a Volkswagen, Audi or Porsche dealership—*i.e.*, is currently capable of being driven under the power of its own 3.0L diesel engine and of being driven lawfully and safely on public roads, even if it has a mechanical issue that can be repaired. A vehicle is not considered operable if, among other reasons, it had a branded title of “Dismantled”, “Junk”, “Salvage” or “Mechanically Unfit” on November 2, 2015, or was acquired by any person or entity from a junkyard or a salvage yard on or after November 2, 2015.

If you are a Settlement Class Member who owns a Generation One or Generation Two vehicle that is or becomes inoperable, and is not repaired at your expense to make it operable, you may surrender your vehicle and receive a cash payment based on your Settlement Class Member category and vehicle Generation type (*see Questions I and J*). You will not receive Vehicle Value for your vehicle. Volkswagen vehicles must be surrendered to an authorized Volkswagen dealer, Audi vehicles must be surrendered to an authorized Audi dealer, and Porsche vehicles must be surrendered to an authorized Porsche dealer.

To receive this option, you must arrange to resolve any outstanding loans on your vehicle and unpaid Québec traffic tickets and fines before your vehicle is surrendered. To assist with satisfying any outstanding loans on your vehicle, some or all of your cash payment may, if directed by you, be paid by Volkswagen to your lender(s). You will be responsible for payment of any loan balance not satisfied by payments made by Volkswagen. Loan forgiveness will not be available if you surrender an inoperable vehicle.

Surrenders for inoperability will take place at an authorized dealership located in Canada except that, if your Eligible Vehicle is registered in the U.S., you may complete your surrender for

inoperability at an authorized dealership located in the U.S. In either case, all surrenders for inoperability of a Volkswagen vehicle must take place at an authorized Volkswagen dealership, all surrenders for inoperability of an Audi vehicle must take place at an authorized Audi dealership, and all surrenders for inoperability of a Porsche vehicle must take place at an authorized Porsche dealership. If the 3.0L Settlement is approved, additional details will be provided regarding the claims process for Settlement Class Members with Eligible Vehicles registered in the U.S. who purchased their vehicle in Canada.

## **APPROVED EMISSIONS MODIFICATION QUESTIONS**

### **Y. WHAT IS THE REDUCED EMISSIONS MODIFICATION WITH EXTENDED EMISSIONS WARRANTY?**

The Reduced Emissions Modification may be available for Generation One vehicles through a recall. It allows Settlement Class Members to keep their Generation One vehicle and receive an emissions system modification from an authorized Volkswagen or Audi dealership. The Reduced Emissions Modification will be available only if a modification of the emissions system for your Generation One vehicle is approved by the U.S. Environmental Protection Agency (EPA). Volkswagen Group continues to work with U.S. regulators to develop Reduced Emissions Modifications for model year 2009-2012 Generation One vehicles.

Notice will be sent by mail and e-mail and be made available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) to keep Settlement Class Members informed of the approval and availability of the Reduced Emissions Modification for their Generation One vehicle. The notice will include a clear and accurate disclosure regarding any of the effects of the Reduced Emissions Modification that may be reasonably important to customers.

If approved, Settlement Class Members in possession of their Generation One vehicle can choose the Reduced Emissions Modification with Extended Emissions Warranty to receive a substantial cash payment in the 3.0L Settlement (*see Question 1*). These Settlement Class Members are also entitled to a free AdBlue<sup>®</sup> refill and free oil change when they receive an offer for the cash payment for the Reduced Emissions Modification.

The Extended Emissions Warranty is a transferrable warranty that will apply to all vehicles that receive the Reduced Emissions Modification. It will cover all replaced components that are part of the Reduced Emissions Modification and any component that reasonably could be impacted by the effects of the Reduced Emissions Modification, as determined by the U.S. EPA.

The Extended Emissions Warranty period will be the greater of:

- 10 years or 193,000 km, whichever comes first, from the vehicle's original in-service date; and
- 4 years or 77,000 km, whichever comes first, from the date and mileage of implementing the Reduced Emissions Modification.

The original in-service date is the date that the vehicle was originally leased or sold to a retail customer.

**Z. WHAT IF THERE IS NO REDUCED EMISSIONS MODIFICATION FOR MY GENERATION ONE VEHICLE?**

There will be a Reduced Emissions Modification (*see Question Y*) only if a modification of the emissions system for your Generation One vehicle is approved by the U.S. Environmental Protection Agency (Volkswagen Group continues to work with U.S. regulators to develop Reduced Emissions Modifications for model year 2009-2012 Generation One vehicles), and is available through a VW or Audi recall in Canada. You can wait to see whether a Reduced Emissions Modification becomes available or choose any other benefit that is available to you.

If you own your Generation One vehicle and a Reduced Emissions Modification for your Generation One vehicle is not available by recall in Canada by **September 14, 2018**, you will have a second opportunity to opt out of the 3.0L Settlement between **September 15, 2018** and **November 15, 2018**, provided you have not already made a claim or received benefits under the 3.0L Settlement. If you choose to remain in the 3.0L Settlement, then:

- If you are an Eligible Owner of a Generation One vehicle, you can choose between the other benefits listed at Question I.
- If you are an Eligible Purchaser or an Eligible Lessee who purchased your Generation One vehicle at lease-end, you can choose a Buyback or Trade-In and receive your cash payment based on your Settlement Class Member category (*see Question I*). To receive a Buyback or Trade-In, you must arrange to resolve any outstanding loans on your vehicle and unpaid Québec traffic tickets and fines before it is surrendered. Loan forgiveness will, where applicable, be available toward satisfaction of loans on your vehicle (*see Question V*).

If you lease your Generation One vehicle and a Reduced Emissions Modification for your Generation One vehicle is not available by recall in Canada by **September 14, 2018**, then:

- If you are an Eligible Lessee of a Generation One vehicle and continue to be in your lease at that time, you can select an Early Lease Termination and receive your cash payment (*see Question I at Table D, column A*).

**AA. WHAT IS THE EMISSIONS COMPLIANT REPAIR WITH EXTENDED EMISSIONS WARRANTY?**

The Emissions Compliant Repair is available for Generation Two vehicles through a recall. It allows Settlement Class Members to keep their Generation Two vehicle and receive an emissions system repair from a Volkswagen, Audi or Porsche dealership, which will bring their vehicle into compliance with the emissions standards to which it was originally certified. The U.S. Environmental Protection Agency (EPA) has approved an Emissions Compliant Repair (*see Question AA*) for all model year 2013-2016 Generation Two vehicles.

Notice will be provided when the recalls for the Emissions Compliant Repair launch in Canada and are available at authorized dealerships. This notice will be sent by mail and e-mail and be made available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) to keep Settlement Class Members informed of the availability of the Emissions Compliant Repair for their Generation Two vehicle. The notice will include a clear and accurate disclosure regarding any of the effects of the Emissions Compliant

Repair that may be reasonably important to customers. See Question T for more information about the Emissions Compliant Repair.

Settlement Class Members in possession of their Generation Two vehicle can obtain the Emissions Compliant Repair with Extended Emissions Warranty to receive a substantial cash payment in the 3.0L Settlement (*see Question J*).

You can choose to receive the Emissions Compliant Repair through the recall before the claims program begins (*see Question K*) without losing any right to claim the cash payment available to you in the 3.0L Settlement.

The Extended Emissions Warranty is a transferrable warranty that will apply to all vehicles that receive the Emissions Compliant Repair. It will cover all replaced components that are part of the Emissions Compliant Repair and any component that reasonably could be impacted by the effects of the Emissions Compliant Repair, as determined by the U.S. EPA.

The Extended Emissions Warranty period will be the greater of:

- 10 years or 193,000 km, whichever comes first, from the vehicle's original in-service date; and
- 4 years or 77,000 km, whichever comes first, from the date and mileage of implementing the Emissions Compliant Repair.

The original in-service date is the date that the vehicle was originally leased or sold to a retail customer.

**BB. HOW WILL THE EMISSIONS COMPLIANT REPAIR AFFECT THE PERFORMANCE OF MY GENERATION TWO VEHICLE?**

As part of the 3.0L Settlement, Volkswagen has represented that the Emissions Compliant Repair will not result in Reduced Performance. Reduced Performance means a change in any of the following performance attributes: (1) a reduction in calculated fuel economy using the U.S. EPA formula of more than 3 miles per gallon (MPG); (2) a decrease of greater than 5% in peak horsepower; or (3) decrease of greater than 5% peak torque. These attributes were measured by Volkswagen Group according to industry standards when it submitted the Emissions Compliant Repair to the U.S. EPA.

In the event that an Emissions Compliant Repair causes Reduced Performance, Volkswagen will make an additional payment of \$500 for each affected Generation Two vehicle.

If an Emissions Compliant Repair causes substantial, material adverse degradation above and beyond the Reduced Performance levels specified above, affected Settlement Class Members reserve their right to seek, and Volkswagen reserves its right to oppose, additional remedies from the Courts.

**SETTLEMENT PROCESS QUESTIONS**

**CC. IF I AM A SETTLEMENT CLASS MEMBER, WHAT RIGHTS AM I GIVING UP?**

A settlement is an agreement to resolve legal claims, and usually involves compromises by both

**Volkswagen / Audi / Porsche 3.0L Diesel Emissions Settlement in Canada**  
**OFFICIAL COURT COMMUNICATION**

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sides. Settlements end all or part of a lawsuit while allowing the parties to avoid the costs and risks of a trial. A settlement also allows the parties to avoid the very significant time delays of litigation.

If the 3.0L Settlement is approved by the Courts and you do not validly and timely opt out of the Settlement Class, you will release Volkswagen, Audi and Porsche from the Class Actions claims. Releasing someone from a claim means giving up the right to sue them. If you do not opt out of the Class Actions (see *Question FF*), you will release Volkswagen, Audi and Porsche from the claims related to the software or auxiliary emission control device in any Eligible Vehicle that you owned or leased on or after November 2, 2015. You will also release Volkswagen, Audi and Porsche for those claims in respect of any Eligible Vehicles that you owned or leased before November 2, 2015 and that you no longer owned or leased on November 2, 2015.

All Settlement Class Members are bound by a general release that will take effect whether they claim benefits or not. Settlement Class Members who wish to participate in the claims program must make their claim before the claims submission deadline. You will have until **May 31, 2019** to submit a claim and, if eligible, until **August 31, 2019** to obtain your Settlement benefits.

You will have to sign an individual release in order to receive Settlement benefits for your Eligible Vehicle. If on or after November 2, 2015 you own or lease more than one Eligible Vehicle, signing the individual release will not prevent you from obtaining eligible benefits in respect of your other Eligible Vehicles during the claims program.

The above is only a summary of the general release and individual release. The 3.0L Settlement Agreement sets out and describes these releases, so read them carefully. If you have any questions, you can talk to Class Counsel (see *Question HH*) for free. You can also talk to your own lawyer, at your own expense, if you have questions about what this means. The 3.0L Settlement Agreement is available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca).

**Note: The 3.0L Settlement does not release Volkswagen, Audi or Porsche for claims of personal injury or wrongful death. In addition, the 3.0L Settlement does not release Volkswagen or Audi for claims relating to 2.0-litre diesel vehicles.**

**DD. I HAVE AN INDIVIDUAL / JOINDER LAWSUIT AGAINST VOLKSWAGEN, AUDI OR PORSCHE. WHAT DO I NEED TO DO TO PARTICIPATE IN THE 3.0L SETTLEMENT?**

If you reside in a province/territory other than Québec and have an action (other than these Class Actions) pending as against Volkswagen/Audi/Porsche relating to the same facts underlying the claims resolved by the 3.0L Settlement, and if you do not validly opt out of the 3.0L Settlement, you will be a Settlement Class Member and eligible for Settlement benefits in exchange for giving up the right to sue Volkswagen, Audi or Porsche for the claims resolved by the 3.0L Settlement. You will be required to bring the action to an end, with prejudice where available.

If you reside in Québec and have an action (other than the Class Actions) pending against Volkswagen/Audi/Porsche relating to the same facts underlying the claims resolved by the 3.0L Settlement, you will be considered as having opted out of the 3.0L Settlement, in which case, you will not be eligible to submit a claim for Settlement benefits unless you discontinue the action by **March 19, 2018**. If you do not discontinue your action by that date, you will be required to obtain a Court order to opt back into the 3.0L Settlement. The only exception is if your action is pending outside Québec, in which case, different legal procedures apply: you may submit a claim under the 3.0L Settlement and, upon proof of filing of a discontinuance of the action, you will be deemed to have elected to opt back into the 3.0L Settlement.

**EE. HOW CAN I OBJECT TO THE 3.0L SETTLEMENT?**

Before objecting, it is recommended that you visit [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) to get more information about the 3.0L Settlement. You can talk to Class Counsel (see *Question HH*) for free. You can also talk to your own lawyer at your own expense.

If you are a Settlement Class Member and have comments about, or disagree with, any aspect of the 3.0L Settlement that applies to you, you may express your views to the Courts by submitting a personally signed written objection as provided below. An Objection Form is available as of January 17, 2018 at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). You may object only if you do not exclude yourself from (*i.e.*, opt out of) the 3.0L Settlement.

Your objection must include:

- Your name, mailing address, telephone number and e-mail address (if applicable);
- The make, model, model year and VIN of your vehicle;
- A statement that you object to the 3.0L Settlement;
- The reasons you object to the 3.0L Settlement, along with any supporting materials;
- Whether you intend to appear in person or through a lawyer at a 3.0L Settlement approval hearing (see *Question GG*), and if appearing through a lawyer, the name, address, telephone number and e-mail address of your lawyer; and
- Your signature.

Your objection must be received by no later than **March 19, 2018** at:

Mail or Courier to:	Volkswagen/Audi/Porsche Class Action Administration P.O. Box 7071 31 Adelaide Street East Toronto, ON M5C 3H2	E-Mail to: <a href="mailto:vw@ricepoint.com">vw@ricepoint.com</a>
<b>DO NOT SEND OBJECTIONS DIRECTLY TO THE COURTS</b>		

**Note: Objecting to the 3.0L Settlement simply means telling the Courts that you do not like something about the 3.0L Settlement. If the Courts approve the 3.0L Settlement, you will still be a Settlement Class Member, provided you meet the eligibility requirements, and you will be bound by the terms of the 3.0L Settlement whether or not you make a claim. Objecting does not disqualify you from making a claim nor does it make you ineligible to receive benefits under the 3.0L Settlement. You cannot object to the 3.0L Settlement and also opt out. If you do both, only your opt-out request will apply and your objection will be considered withdrawn.**

If you deliver an objection to the 3.0L Settlement, you do not have to come to Court to talk about it. As long as you submit your written objection on time, the Courts will receive it. Should you wish to speak at a hearing, you must indicate your wish to do so in your written objection. You can hire a



lawyer to appear on your behalf at your own expense or you may appear. As the 3.0L Settlement was negotiated between Class Counsel and Volkswagen, Class Counsel will not be advocating on behalf of objectors at the hearings.

**FF. HOW CAN I OPT OUT OF THE 3.0L SETTLEMENT?**

Before excluding yourself by opting out of the 3.0L Settlement, it is recommended that you visit [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) to get more information about the 3.0L Settlement. You can talk to Class Counsel (see *Question FF*) for free. You can also talk to your own lawyer at your own expense.

If you do not want to participate in the 3.0L Settlement or be bound by it, you must exclude yourself by opting out. If you opt out, you will not be eligible to receive any benefits under the 3.0L Settlement and you will not be able to object to the 3.0L Settlement, but you will keep any right you have to separately sue Volkswagen, Audi or Porsche at your own cost.

To opt out, you must submit a personally signed written request as provided below. An Opt-Out Form is available as of January 17, 2018 at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca).

Your opt-out request must include:

- Your name, mailing address, telephone number and e-mail address (if applicable);
- The make, model, model year and VIN of your vehicle;
- A statement that you wish to be excluded from the 3.0L Settlement;
- If you own your vehicle, a copy of the vehicle's registration certificate or bill of sale, and if you lease your vehicle from VCCI or PFSC, a copy of the lease agreement with VCCI or PFSC; and
- Your signature.

Your opt-out request must be received by no later than **March 19, 2018** at:

Mail or Courier to:	Volkswagen/Audi/Porsche Class Action Administration P.O. Box 7071 31 Adelaide Street East Toronto, ON M5C 3H2	E-Mail to: <a href="mailto:vw@ricepoint.com">vw@ricepoint.com</a>
<b>DO NOT SEND OPT-OUT REQUESTS DIRECTLY TO THE COURTS</b>		

Opt out requests may only be made by a representative on behalf of Settlement Class Members who are minors, incapable persons or deceased. Please refer to the Opt-Out section at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) for more information.

Requests that are not personally signed, that do not contain all of the required information or that are received after **March 19, 2018**, will be invalid and will not operate to exclude you from the 3.0L Settlement.

**Note: If you opt out, you are telling the Courts that you do not want to participate in the 3.0L Settlement. Therefore, you will not be eligible to receive any benefits from the 3.0L Settlement and you will not be able to object to the 3.0L Settlement. You cannot opt out of and also object to the 3.0L Settlement. If you do both, only your opt-out request will apply and your objection will be considered withdrawn.**

If, in any Canadian province/territory except Québec, you have an action (other than the Class Actions) pending against Volkswagen/Audi/Porsche relating to the same facts underlying the claims being resolved by the 3.0L Settlement, you must take the above steps by **March 19, 2018** if you want to continue your own action and do not want to participate in the 3.0L Settlement.

If, in Québec, you have an action (other than the Class Actions) pending against Volkswagen/Audi/Porsche relating to the same facts underlying the claims being resolved by the 3.0L Settlement, you will be automatically treated as having opted out of the 3.0L Settlement unless you discontinue the action on or before **March 19, 2018**.

If you change your mind after opting out and wish to participate in the 3.0L Settlement, you may send a request to the Volkswagen/Audi/Porsche Class Action Administrator asking to rejoin the 3.0L Settlement as long as it is received on or before **March 19, 2018**.

#### **GG. CAN I ATTEND THE 3.0L SETTLEMENT APPROVAL HEARINGS?**

Yes. Before determining whether to approve the 3.0L Settlement, the Courts will hold the following hearings:

- The Ontario Superior Court of Justice will hold a 3.0L Settlement approval hearing at 130 Queen Street West, Toronto on April 5, 2018; and
- The Superior Court of Québec will hold a 3.0L Settlement approval hearing at the Montreal Courthouse on April 3, 2018.

The hearings may move to a different date or time. Visit [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) or call the Canadian Settlement Claims Centre at 1-888-670-4773 for current information.

At these hearings, the Courts will consider whether the 3.0L Settlement is fair, reasonable and in the best interests of the Settlement Class. Class Counsel will answer any questions the Courts may have about the 3.0L Settlement. If there are objections, the Courts will consider them at that time. After the hearing, the Courts will decide whether to approve the 3.0L Settlement. We do not know how long these decisions will take.

You are welcome to attend the hearings at your own expense, but you are not required to attend.

**HH. WHO IS MY LAWYER / CLASS COUNSEL?**

The law firms representing all Settlement Class Members are listed below:

<b>CANADA (EXCEPT QUÉBEC)</b>		<b>QUÉBEC</b>
<p><b>Camp Fiorante Matthews Mogerman (Co-Lead Counsel)</b>                      400-856 Homer St.                      Vancouver, BC V6B 2W5</p>	<p><b>McKenzie Lake Lawyers LLP (Co-Lead Counsel)</b>                      1800-140 Fullarton St.                      London, ON N6A 5P2</p>	<p><b>Belleau Lapointe LLP (Co-Lead Counsel for Québec Settlement Class Members with VW and Audi vehicles)</b>                      306 D'Youville Place (B-10)                      Montreal, QC H2Y 2B6</p>
<p><b>Strosberg Sasso Sutts LLP</b>                      1561 Ouellette Avenue                      Windsor, ON N8X 1K5</p>	<p><b>Siskinds LLP</b>                      302-100 Lombard St.                      Toronto, ON M5C 1M3</p>	<p><b>Lex Group Inc. (Class Counsel for Québec Settlement Class Members with Porsche vehicles)</b>                      4101 Sherbrooke St. W.                      Westmount, QC H3Z 1A7</p>
<p><b>Branch MacMaster LLP</b>                      1410-777 Hornby St.                      Vancouver, BC V6Z 1S4</p>	<p><b>Koskie Minsky LLP</b>                      900-20 Queen St. W., Box 52                      Toronto, ON M5H 3R3</p>	
<p><b>Roy O'Connor LLP</b>                      2300-200 Front St. W.                      Toronto, ON M5V 3K2</p>	<p><b>Rochon Genova LLP</b>                      900-121 Richmond St. W.                      Toronto, ON M5H 2K1</p>	

You will not be charged for contacting these lawyers. Class Counsel can be reached by telephone at:

- Canadian residents except for Québec and French inquiries: 1-866-881-2292 or 1-844-425-2934;
- VW / Audi Québec residents and French inquiries: 1-888-987-6701; and
- Porsche Québec residents and French inquiries: 514-451-5500 x401.

**II. HOW WILL CLASS COUNSEL BE PAID?**

In addition to the 3.0L Settlement benefits described above, Volkswagen has agreed to pay the legal fees and costs of Class Counsel that are approved by the Courts. This means that Settlement Class Members will receive 100% of their eligible benefits described in this Notice and their compensation will not be reduced by legal fees or costs.

**JJ. HOW DO I GET MORE INFORMATION?**

This Notice is only a summary of some of the terms of the 3.0L Settlement. If there is a conflict between this Notice and the 3.0L Settlement, the 3.0L Settlement applies.

If you are a non-Volkswagen, Audi or Porsche dealer or leasing company, your rights could be affected by the 3.0L Settlement in a manner not described in this Notice. You should consult the

**Volkswagen / Audi / Porsche 3.0L Diesel Emissions Settlement in Canada**  
**OFFICIAL COURT COMMUNICATION**

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3.0L Settlement Agreement, which is available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca).

For more information about your legal rights under the 3.0L Settlement, you may also consult Class Counsel at no charge by calling:

- Canadian residents except for Québec and French inquiries: 1-866-881-2292 or 1-844-425-2934;
- VW / Audi Québec residents and French inquiries: 1-888-987-6701; and
- Porsche Québec residents and French inquiries: 514-451-5500 x401.

In addition, more detailed information about the options Settlement Class Members may have, is available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca), or by calling the Canadian Settlement Claims Centre at 1-888-670-4773.