

**FREQUENTLY ASKED QUESTIONS (FAQ)  
Volkswagen/ Audi/ Porsche 3.0-Litre Settlement**

**Updated May 11, 2018**

**This is a summary of anticipated questions.**

**New questions may be added from time to time.**

**If you have any questions that are not included on this list, or you have any questions about rights under the 3.0L Settlement, you should contact one of the lawyers on the Class Counsel list (see Questions 55 and 56). Class Counsel is available to assist at no cost to you.**

Table of Contents

A. CLASS ACTION QUESTIONS..... 6

1. What are the Class Actions about? ..... 6

2. What happened in the Class Actions? ..... 6

3. I thought there had already been a settlement in Canada. Is this a new settlement?..... 6

4. I think I am included in the 3.0L Settlement. What are my options? ..... 7

B. CLASS MEMBERSHIP QUESTIONS..... 7

5. Am I included in the 3.0L Settlement? ..... 7

6. Is my vehicle an “Eligible Vehicle”? ..... 8

7. What if I purchased or leased my vehicle in the U.S. or abroad, but live in Canada? ..... 9

8. What if I purchased or leased my vehicle in Canada, but live in the U.S.?..... 9

9. What if my vehicle is not currently registered in Canada or the U.S.?..... 9

10. Am I a “Settlement Class Member”? ..... 10

11. Can companies or legal entities be Eligible Owners, Purchasers, Sellers or Lessees?11

12. I am a non-Volkswagen / Audi / Porsche dealer. Am I included in the 3.0L Settlement?  
11

13. I am leasing my vehicle to someone else. Am I included in the 3.0L Settlement? ..... 11

14. Am I excluded from the 3.0L Settlement? ..... 12

15. I participated in the 2.0L Settlement. Can I participate in the 3.0L Settlement? ..... 13

16. I opted out of the 2.0L Settlement. Can I participate in the 3.0L Settlement? ..... 13

C. SETTLEMENT BENEFITS QUESTIONS..... 13

17. Why does the 3.0L Settlement differentiate between Generation One and Generation Two vehicles? ..... 13

18. If I am an Eligible Owner of a Generation One Eligible Vehicle, what benefits can I receive? ..... 14

19. If I am an Eligible Seller of a Generation One Eligible Vehicle, what benefits can I receive? ..... 14

20. If I am an Eligible Purchaser of a Generation One Eligible Vehicle, what benefits can I receive? ..... 14

21. If I am an Eligible Lessee of a Generation One Eligible Vehicle, what benefits can I receive? ..... 15

22. If I choose the Reduced Emissions Modification for my Generation One vehicle, what benefits can I receive?..... 16

23.	If I choose an Early Lease Termination for my Generation One vehicle, what benefits can I receive?.....	17
24.	If I choose a Buyback for my Generation One vehicle, what benefits can I receive?....	17
25.	If I choose a Buyback With Trade-In for my Generation One vehicle, what benefits can I receive? .....	18
26.	Does the physical condition of my vehicle affect my eligibility for Buyback or Buyback With Trade-In? .....	19
27.	How is the “Vehicle Value” of my Generation One vehicle calculated and when will I know my “Vehicle Value”? .....	20
28.	How is the “Fair Market Value” for my Generation One vehicle calculated and when will I know my “Fair Market Value”? .....	20
29.	Which Extended Vehicle Warranties and/or vehicle service contracts or plans qualify for a refund if I choose the Buyback or Buyback With Trade-In? .....	21
30.	How do I submit my claim for an Extended Vehicle Warranty reimbursement? .....	21
31.	Does the Extended Vehicle Warranty have to be from Volkswagen Canada, Audi Canada, or one of their affiliates to be eligible for the reimbursement? .....	22
32.	If I am an Eligible Owner of a Generation Two Eligible Vehicle, what benefits can I receive? .....	22
33.	If I am an Eligible Seller of a Generation Two Eligible Vehicle, what benefits can I receive? .....	23
34.	If I am an Eligible Purchaser of a Generation Two Eligible Vehicle, what benefits can I receive? .....	23
35.	If I am an Eligible Lessee of a Generation Two Eligible Vehicle, what benefits can I receive? .....	24
36.	Why is my Generation Two vehicle not eligible for a Buyback, Buyback With Trade-In or Early Lease Termination? .....	25
37.	I owned my Eligible Vehicle on November 2, 2015 and transferred it to my parent, grandparent, child, sibling or spouse. Is the current owner an Eligible Owner? .....	25
38.	My Eligible Vehicle was transferred to me by a parent, grandparent, child, sibling or spouse who owned the vehicle on November 2, 2015. Am I an Eligible Owner?.....	26
39.	Can I receive benefits if my Eligible Vehicle was totalled? .....	26
40.	Can I receive benefits if my Eligible Vehicle is not Operable? .....	26
41.	Can I participate in the 3.0L Settlement if I have a vehicle loan on my Eligible Vehicle?	
	27	
D.	APPROVED EMISSIONS MODIFICATION QUESTIONS .....	28
42.	What is the Approved Emissions Modification?.....	28

43.	What is the Reduced Emissions Modification with Extended Emissions Warranty? .....	28
44.	What if there is no Reduced Emissions Modification for my Generation One vehicle? .....	29
45.	What is the Emissions Compliant Repair with Extended Emissions Warranty?.....	30
46.	How will the Emissions Compliant Repair affect the performance of my Generation Two vehicle? .....	31
47.	I have received a notice of recall. What does that mean? .....	31
48.	Will a subsequent purchaser know if a vehicle has been modified with the Approved Emissions Modification?.....	32
E.	SETTLEMENT PROCESS QUESTIONS.....	32
49.	If I am a Settlement Class Member, what rights did I give up?.....	32
50.	Can I object to the 3.0L Settlement?.....	33
51.	Can I exclude myself (opt out of) the 3.0L Settlement? .....	33
52.	I started an individual/joiner/class action lawsuit against Volkswagen, Audi and/or Porsche, can I proceed with that action?.....	33
53.	I started an individual/joiner/class action lawsuit against Volkswagen, Audi and/or Porsche, what do I need to do to participate in the 3.0L Settlement? .....	34
54.	Can I participate in the 3.0L Settlement if I received the Owner Credit Package? .....	34
55.	Who is my lawyer (Class Counsel)?.....	35
56.	Can I speak to Class Counsel, and does it cost anything? .....	35
57.	Do I need to hire my own lawyer to participate in the 3.0L Settlement?.....	36
58.	How will Class Counsel be paid?.....	36
F.	CLAIMS PROCESS AND ADMINISTRATION .....	36
59.	What are the next steps now that the 3.0L Settlement is approved?.....	36
60.	What supporting documents do I need to make a claim? .....	36
61.	What is a VIN and how do I find it? .....	37
62.	What do I do if I have more than one Eligible Vehicle?.....	37
63.	What are the steps to make a claim?.....	37
64.	How can I submit a claim? .....	38
65.	What happens after I make a claim? What are the anticipated processing timelines? .....	39
66.	How do I get more information about the status of my claim? .....	40
67.	I received my offer letter. What do I do?.....	40
68.	Can I appeal decisions made by the Claims Administrator? .....	40
69.	I have accepted my offer for benefits. What happens next? .....	41

70.	When will I receive my payment for benefits? .....	42
71.	Will my 3.0L Settlement payment be taxed?.....	43
72.	Can I change my mind about the benefits I choose? .....	43
73.	When is the deadline to claim my benefits?.....	43
74.	Will my out-of-pocket costs to get my vehicle to a dealership be covered?.....	43
75.	How do I know if there is a lien on my vehicle?.....	43
76.	What is the Pre-Appointment Confirmation Call?.....	44
77.	Can Volkswagen offer me any other incentives? .....	44
78.	How and when can I schedule an appointment for a Buyback or Buyback With Trade-In? .....	45
79.	If I choose a Buyback With Trade-In, can I trade my Audi vehicle for a Volkswagen vehicle? Can I trade my Volkswagen vehicle for an Audi vehicle? .....	45
80.	Can I trade my Volkswagen or Audi vehicle for a Porsche vehicle?.....	45
81.	How and when can I schedule an appointment for Early Lease Termination? .....	45
82.	Do I have to check with VW Credit Canada, Inc. or Porsche Financial Services Canada, Inc. before terminating my lease? .....	46
83.	How and when can I schedule an appointment for a Surrender For Inoperability? .....	46
84.	How and when can I schedule an appointment for an Approved Emissions Modification? .....	46
85.	What should I expect at my Buyback, Buyback With Trade-In or Early Lease Termination Appointment?.....	46
86.	What should I expect at my Reduced Emissions Modification or Emissions Compliant Repair Appointment? .....	47
87.	If I am asked to pay for repairs on my vehicle in order for the Reduced Emissions Modification or Emissions Compliant Repair to be performed, what should I do?.....	47
88.	I have additional questions. Who should I call? .....	49
89.	How do I get more information?.....	49

## **A. CLASS ACTION QUESTIONS**

### **1. What are the Class Actions about?**

Following a disclosure of emissions-related issues, class actions were commenced in Canada seeking damages and other relief on behalf of consumers with affected 3.0L diesel vehicles. The class actions allege that the affected 3.0L diesel 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.

### **2. What happened in the Class Actions?**

A nationwide Settlement in Canada has been reached with certain current and former owners and lessees of 3.0L Volkswagen, Audi and Porsche diesel vehicles. This 3.0L Settlement was reached following negotiations between Volkswagen, Audi and Porsche and class action lawyers for the owners and lessees, in consultation with the Commissioner of Competition in Canada.

The 3.0L Settlement was approved by the Courts following Settlement Approval Hearings held in Ontario and Quebec, and the settlement claims program to distribute settlement benefits (the “Claims Program”) commenced on **May 8, 2018**.

### **3. I thought there had already been a settlement in Canada. Is this a new settlement?**

The 3.0L Settlement in Canada resolves claims by certain current and former owners and lessees of affected 3.0L diesel Volkswagen, Audi and Porsche vehicles that were originally (a) sold in Canada, or (b) leased in Canada from VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc. The 3.0L Settlement is distinct from the 2.0L Settlement in Canada, which was approved by the Courts in April 2017 and which offers benefits to certain current and former owners and lessees of affected 2.0L diesel Volkswagen and Audi vehicles.

#### 4. I think I am included in the 3.0L Settlement. What are my options?

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

<b>LEARN MORE ABOUT THE SETTLEMENT AND WHETHER YOU MAY BE ELIGIBLE</b>	<b>STEP 1:</b> Determine whether you may be eligible for the 3.0L Settlement, and learn more about the estimated benefits to which you may be entitled, using the <a href="#">Check My Eligibility</a> section of this website. <b>STEP 2:</b> Determine whether your vehicle may be included in the 3.0L Settlement using the <a href="#">Vehicle Look-Up</a> section of this website. You will need your Vehicle Identification Number (“VIN”) for this step (see Question 61).
<b>MAKING A CLAIM UNDER THE SETTLEMENT</b>	Starting on <b>May 8, 2018</b> , you may make a claim under the 3.0L Settlement. You have until <b>May 31, 2019</b> to submit your completed claim for settlement benefits. Details on how claims can be submitted are outlined in the CLAIMS PROCESS AND ADMINISTRATION QUESTIONS section of these FAQ, beginning at Question 59.
<b>IF YOU TAKE NO STEPS</b>	You will not receive any benefits from the 3.0L Settlement if you do not submit a claim in the Settlement by <b>May 31, 2019</b> . If you did not validly opt out of the Settlement by <b>March 19, 2018</b> as determined by RicePoint (see Question 51), you are bound by the 3.0L Settlement, and you have given up any right you had to separately sue Volkswagen, Audi or Porsche for the claims being resolved by the 3.0L Settlement.

## B. CLASS MEMBERSHIP QUESTIONS

#### 5. 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 6); and
- You are a Settlement Class Member (see Question 10).

**If you sold or sell your vehicle on or after January 17, 2018, you are not eligible for benefits.**

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.

## 6. Is my 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 (see Question 17).

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:

GENERATION ONE		GENERATION TWO	
Diesel Model	Model Years	Diesel Model	Model Years
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) or Porsche Financial Services Canada, Inc.;
- 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 45) or Reduced Emissions Modification for Generation One vehicles (see Question 43), unless completed by you through a Volkswagen, Audi or Porsche recall.

You can enter your Vehicle Identification Number, also known as a VIN (see Question 61), in the [Vehicle Look-Up](#) section of this website to determine if your vehicle is included in the 3.0L Settlement.

The eligibility of claims will be determined by the Court-appointed Claims Administrator. Additional eligibility requirements apply in order to participate in the 3.0L Settlement.



## **7. What if I purchased or leased my vehicle in the U.S. or abroad, but live in Canada?**

To be an Eligible Vehicle, your vehicle 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) or Porsche Financial Services Canada, Inc. If your vehicle was originally sold in the U.S., it is not an Eligible Vehicle under the 3.0L Settlement in Canada. You can enter your Vehicle Identification Number, also known as a VIN (see Question 61), in the [Vehicle Look-Up](#) section of this website to determine if your vehicle is included in the 3.0L Settlement (see Question 6).

Please note that, in order to be an Eligible Vehicle, your vehicle must also have been registered in Canada at any point between November 2, 2015 and January 17, 2018, or registered in the U.S. during the entire period from November 2, 2015 through January 17, 2018. Owners and lessees of 3.0L Volkswagen, Audi or Porsche vehicles originally sold or leased in the U.S. may be eligible to claim under the U.S. settlement. Visit [www.vwcourtsettlement.com](http://www.vwcourtsettlement.com) for more information on the U.S. settlement.

## **8. What if I purchased or leased my vehicle in Canada, but live in the U.S.?**

To be an Eligible Vehicle, your vehicle 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) or Porsche Financial Services Canada, Inc.

It must also have been registered in Canada at any point between November 2, 2015 and January 17, 2018, or registered in the U.S. during the entire period from November 2, 2015 through January 17, 2018.

If you meet these conditions and your Eligible Vehicle is registered in the U.S., you may make a claim in the 3.0L Settlement using the Canadian Claims Portal at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). If applicable, you will have the option to complete a Buyback, Surrender For Inoperability, the Emissions Compliant Repair or, if available, the Reduced Emissions Modification at an authorized dealership located in the U.S. However, Buyback With Trade-Ins or Early Lease Terminations must take place at an authorized dealership in Canada.

## **9. What if my vehicle is not currently registered in Canada or the U.S.?**

If your vehicle is not currently registered in Canada or the U.S., you may be eligible to participate in the 3.0L Settlement if your vehicle:

- a) was originally sold in Canada, or leased in Canada from VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc.; and
- b) was registered in Canada at any point between November 2, 2015 and January 17, 2018, or registered in the U.S. during the entire period from November 2, 2015 through January 17, 2018.

If you meet these conditions, you may make a claim in the 3.0L Settlement using the Canadian Claims Portal at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). If applicable, you will have to complete a Buyback, Buyback With Trade-In, Early Lease Termination, Surrender For Inoperability, Emissions Compliant Repair or, if available, the Reduced Emissions Modification at an authorized dealership in Canada.

**10. 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 VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc.; 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.

Some exceptions apply (see Question 14).

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>	<p>Eligible Owners are Settlement Class Members who owned an Eligible Vehicle on <b>November 2, 2015</b> and continue to own the vehicle at the time of participating in the 3.0L Settlement.</p> <p>Settlement Class Members who owned an Eligible Vehicle on <b>November 2, 2015</b> and transfer title to an insurance company <b>on or after January 17, 2018</b> because their vehicle was totalled or appraised as a total loss are also Eligible Owners (see Question 39).</p>
<b>Eligible Lessees:</b>	<p>Eligible Lessees are Settlement Class Members who were leasing an Eligible Vehicle from VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc. as of <b>November 2, 2015</b>.</p> <p>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.</p>

<b>Eligible Purchasers:</b>	<p>Eligible Purchasers are Settlement Class Members who purchased an Eligible Vehicle <b>after November 2, 2015</b>, and continue to own the vehicle at the time of participating in the 3.0L Settlement.</p> <p>Eligible Purchasers do not include Eligible Lessees who buy out their leased vehicle at lease-end.</p>
<b>Eligible Sellers:</b>	<p>Eligible Sellers are Settlement Class Members who owned an Eligible Vehicle on <b>November 2, 2015</b> and sell their vehicle <b>before January 17, 2018</b>.</p> <p>Eligible Sellers include those Settlement Class Members who transfer title to an insurance company <b>before January 17, 2018</b> because their vehicle was totalled or appraised as a total loss (see Question 39).</p>

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.

**11. Can companies or legal entities be Eligible Owners, Purchasers, Sellers or Lessees?**

Yes. Settlement Class Members include all persons and entities, except for Excluded Persons (see Question 14).

**12. I am a non-Volkswagen / Audi / Porsche dealer. Am I included in the 3.0L Settlement?**

If you are an automobile dealer or seller other than an authorized Volkswagen, Audi or Porsche dealer, were in business as of January 17, 2018, and are located in Canada, you may be a Settlement Class Member and included in the 3.0L Settlement if you:

- Held an Eligible Vehicle by title or bill of sale dated on or before November 2, 2015; or
- Hold an Eligible Vehicle by title or bill of sale dated after November 2, 2015 and continue to be the owner when you participate in the 3.0L Settlement.

**13. I am leasing my vehicle to someone else. Am I included in the 3.0L Settlement?**

If you are a leasing company other than VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc., you are included in the 3.0L Settlement. In order to participate, you must, by May 31, 2019,

make specific arrangements with Volkswagen, Audi or Porsche, as applicable, in consultation with the Claims Administrator, such that

- a) without canceling or terminating the lease, you may be treated as an Eligible Owner and obtain, during the Claims Period, the Owner Damages Payment or Owner Repair Payment, as the case may be, by receiving the Approved Emissions Modification for the Eligible Vehicle, and
- b) if you take possession of a leased Eligible Vehicle after May 31, 2019 (or after the August 31, 2019 Claims Period Deadline), you may nonetheless be entitled to submit a claim.

To find out more about your options, please contact the Canadian Settlement Claims Centre by calling 1-888-670-4773.

#### **14. Am I excluded from the 3.0L Settlement?**

The 3.0L Settlement applies only to Settlement Class Members (see Question 10). You are not a Settlement Class Member if you are an Excluded Person. Excluded Persons are:

- All those who timely and properly excluded themselves (opted out) from the 3.0L Settlement (see Question 51);
- Anyone who owned an Eligible Vehicle on November 2, 2015 and sells the vehicle after January 17, 2018 other than through the Buyback and Buyback With Trade-In options under the 3.0L Settlement, except for those owners who, on or after January 17, 2018, transfer title to an insurance company because the Eligible Vehicle was totalled or appraised as a total loss (see Question 39);
- Insurance companies and other owners of totalled Eligible Vehicles;
- Any lessees of an Eligible Vehicle leased from a leasing company other than VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc.;
- 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 authorized 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.

**15. I participated in the 2.0L Settlement. Can I participate in the 3.0L Settlement?**

Yes. The 2.0L Settlement is distinct from the 3.0L Settlement.

**16. I opted out of the 2.0L Settlement. Can I participate in the 3.0L Settlement?**

Yes. The 3.0L Settlement offers benefits to current and former owners and lessees of 3.0L Eligible Vehicles, which are not covered by the 2.0L Settlement.

**C. SETTLEMENT BENEFITS QUESTIONS**

**17. Why does the 3.0L Settlement differentiate between Generation One and Generation Two vehicles?**

Emissions modifications that may be available for Generation One vehicles will reduce their emissions but cannot practically bring them into full compliance with the emissions standards to which they were originally certified. That is why Eligible Owners of Generation One vehicles have the option to choose a Buyback or Buyback With Trade-In (see Questions 24 and 25) and Eligible Lessees of Generation One vehicles have the option of an Early Lease Termination (see Question 23). All Settlement Class Members in possession of their Generation One vehicle have the option of a Reduced Emissions Modification with Extended Emissions Warranty, if approved by the U.S. Environmental Protection Agency ("U.S. EPA") and available through a recall in Canada (see Question 43).

In the case of Generation Two vehicles, the U.S. EPA has approved an Emissions Compliant Repair with Extended Emissions Warranty (see Question 45) that brings those vehicles into full compliance with the emissions standards to which they were originally certified. Settlement Class Members in possession of their Generation Two vehicle must receive the Emissions Compliant Repair with Extended Emissions Warranty in order to receive a cash payment in the 3.0L Settlement (see Question 45).

## GENERATION ONE

### 18. If I am an Eligible Owner of a Generation One Eligible Vehicle, what benefits can I receive?

If you are an Eligible Owner (see Question 10) who owned a Generation One Eligible 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** (see Question 24), **Buyback With Trade-In** (see Question 25) or, if available, the **Reduced Emissions Modification with Extended Emissions Warranty** (see Question 43). You may have additional options if your vehicle is totalled (see Question 39) or ceases to be Operable (see Question 40). 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
<b>2009</b>	\$8,875.00	\$9,350.00
<b>2010</b>	\$9,500.00	\$9,850.00
<b>2011</b>	\$9,775.00	\$10,575.00
<b>2012</b>	\$10,450.00	\$12,600.00

### 19. If I am an Eligible Seller of a Generation One Eligible Vehicle, what benefits can I receive?

If you are an Eligible Seller (see Question 10) 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

### 20. If I am an Eligible Purchaser of a Generation One Eligible Vehicle, what benefits can I receive?

If you are an Eligible Purchaser (see Question 10) who acquired your Generation One vehicle after November 2, 2015 and continue to own the vehicle when you participate in the Claims Program, you can receive the **Reduced Emissions Modification with**

**Extended Emissions Warranty**, if available, through a recall. With this option, you will 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 VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) 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 40).

**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

**21. If I am an Eligible Lessee of a Generation One Eligible Vehicle, what benefits can I receive?**

If you are an Eligible Lessee (see Question 10) who, on November 2, 2015, was leasing a Generation One vehicle from VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) 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 below 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** (see Question 23) or, if available, the **Reduced Emissions Modification with Extended Emissions Warranty** (see Question 43). With each of these options, you will receive a **cash payment** as shown in column A of Table D below.

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** (see Question 43) 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 40). If you sell your vehicle before receiving the Reduced Emissions Modification, you are entitled to a **cash payment** as shown in column B of the 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

**22. If I choose the Reduced Emissions Modification for my Generation One vehicle, what benefits can I receive?**

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

If a Reduced Emissions Modification is available, Settlement Class Members in possession of their Generation One vehicle can choose the Reduced Emissions Modification with Extended Emissions Warranty to receive a cash payment in the 3.0L Settlement (see Question 43).

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 24), Buyback With Trade-In (see Question 25) or Early Lease Termination (see Question 23) 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.

Settlement Class Members in possession of their Generation One vehicle are entitled to one free AdBlue® refill and one 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, additional benefit options may become available to you and if you own your vehicle you will have a second opportunity to opt out of the 3.0L Settlement between September 15, 2018 and November 15, 2018 (see Question 44).

**23. If I choose an Early Lease Termination for my Generation One vehicle, what benefits can I receive?**

If you are actively leasing a Generation One vehicle from VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) and choose an Early Lease Termination, you can terminate your lease from VW Credit Canada, Inc. before the end of the lease term without any early termination penalty and receive a cash payment (see Question 21 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 one free AdBlue® refill and one free oil change when they receive an offer for an Early Lease Termination. These services must be redeemed before the vehicle is surrendered.

**24. If I choose a Buyback for my Generation One vehicle, what benefits can I receive?**

If you choose a Buyback, Volkswagen will offer to buy back your Generation One vehicle at its Vehicle Value (see Question 27) and provide an additional cash payment based on your Settlement Class Member category (see Question 10). An estimate of the total payment, based on your vehicle's make, model and model year, your current vehicle mileage, your driving habits and your anticipated Buyback appointment date, is available at Step 11 of the Claims Process on the Claims Portal, which can be accessed at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). Your actual payment may be adjusted upward or downward 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 will, as 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 41). You will be responsible for payment of any loan balance not satisfied by Loan Forgiveness 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.

Settlement Class Members in possession of their Generation One vehicle are entitled to one free AdBlue® refill and one free oil change when they receive an offer for a Buyback. These services must be redeemed before the vehicle is surrendered.

Eligible Owners who complete a Buyback of a Generation One vehicle are entitled to a refund for unused portions of any Extended Vehicle Warranty, which includes (1) mechanical breakdown protection contracts, and (2) Audi Care Prepaid Maintenance contracts, for their vehicle if the warranty was purchased before January 17, 2018 from an authorized Volkswagen or Audi dealer in Canada.

The reimbursement, if any, shall be prorated to account for any unused months (if the Extended Vehicle Warranty is time-based), service/maintenance events (if the Extended Vehicle Warranty is based on service events), and/or mileage (if the Extended Vehicle Warranty is mileage-based), as applicable.

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 are provided regarding the process for submitting these claims at Question 30.

**25.If I choose a Buyback With Trade-In for my Generation One vehicle, what benefits can I receive?**

If you choose to trade in your Generation One vehicle towards the purchase of a new or used Volkswagen or Audi, or other 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 Buyback With Trade-In. 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 27) and Fair Market Value (see Question 28), plus an additional cash payment based on your Settlement Class Member category.

In addition to the tax reduction, an estimate of the total value of the Buyback With Trade-In, based on your Generation One vehicle's make, model and model year, your current vehicle mileage your driving habits and your anticipated Buyback With Trade-In appointment date, is available at Step 11 of the Claims Process on the Claims Portal, which can be accessed at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). Your actual payment may be adjusted upward or downward 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 Buyback With 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 will, as 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 41). You will be responsible for payment of any loan balance not satisfied by Loan Forgiveness payments made by Volkswagen.

All Buyback With Trade-Ins 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 one free AdBlue® refill and one free oil change when they receive an offer for a Buyback With Trade-In. These services must be redeemed before the vehicle is surrendered.

After completing a Buyback With Trade-In of a Generation One vehicle, Eligible Owners (see Question 10) are entitled to a refund for unused portions of any Extended Vehicle Warranty, which includes (1) mechanical breakdown protection contracts, and (2) Audi Care Prepaid Maintenance contracts, for their vehicle if the warranty was purchased before January 17, 2018 from an authorized Volkswagen or Audi dealer in Canada.

The reimbursement, if any, shall be prorated to account for any unused months (if the Extended Vehicle Warranty is time-based), service/maintenance events (if the Extended Vehicle Warranty is based on service events), and/or mileage (if the Extended Vehicle Warranty is mileage-based), as applicable.

Any applicable refunds will need to be claimed within 90 days of completing a Buyback With Trade-In before the May 31, 2019 Claims Submission Deadline, and within 60 days of completing a Buyback With Trade-In thereafter (even if the 60-day period extends past the August 31, 2019 deadline for the Claims Program). Additional details are provided regarding the process for submitting these claims at Question 30.

## **26. Does the physical condition of my vehicle affect my eligibility for Buyback or Buyback With Trade-In?**

Provided your Generation One vehicle is Operable (see Question 40), and except for mileage, the physical condition of your vehicle does not affect its Vehicle Value (see Question 27) or Fair Market Value (see Question 28) 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 Buyback With 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 Buyback With 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 responsible for determining whether a vehicle is ineligible, or eligible only for reduced compensation.

**27. 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 Buyback With 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 Buyback With Trade-In.

CBB independently 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.

An estimate of **your** Vehicle Value, based on your vehicle's make, model and model year, your current vehicle mileage, your driving habits and your anticipated Buyback or Buyback With Trade-In appointment date, is available at Step 11 of the Claims Process on the Claims Portal, which can be accessed at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). Alternatively, general estimated ranges of possible Vehicle Values for Generation One vehicles by make, model and model year are available in Table 2 of Exhibit 5 to the 3.0L Settlement Agreement available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca).

If you are eligible and submit a claim, you will receive an updated estimate of your Vehicle Value from the Claims Administrator with your offer for a Buyback or Buyback With Trade-In. The final amount payable will be confirmed within 20 days from your scheduled Buyback or Buyback With Trade-In based on your vehicle's condition category at that time, provided that the mileage does not increase by more than 2,000 kilometres when you bring your vehicle in for surrender to an authorized Volkswagen or Audi dealership. If your vehicle's mileage exceeds this allowance, your Buyback or Buyback With Trade-In will need to be rescheduled and your Vehicle Value may change.

**28. How is the “Fair Market Value” for my Generation One vehicle calculated and when will I know my “Fair Market Value”?**

If you choose a Buyback With Trade-In of your Generation One vehicle, the Fair Market Value is determined from your vehicle's wholesale value at the time of the Buyback With 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 Buyback With 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.

An estimate of the current Fair Market Value of your vehicle, based on its make, model and model year and mileage, is available at Step 11 of the Claims Process on the Claims Portal, which can be accessed at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). Fair Market Values are determined from market conditions at a given time and are regularly updated by CBB, which means that the Fair Market Value of your vehicle at a future date cannot be estimated in advance.

If you are eligible and submit a claim, you will receive an updated estimate of your Fair Market Value from the Claims Administrator with your offer for a Buyback With Trade-In. Your final Fair Market Value will be based on your vehicle's condition category according to its mileage approximately 20 days before the Buyback With Trade-In, provided that the mileage does not increase by more than 2,000 kilometres when you bring your vehicle in for surrender to an authorized Volkswagen or Audi dealership. If your vehicle's mileage exceeds this allowance, your Buyback With Trade-In will need to be rescheduled and your Fair Market Value may change.

**29. Which Extended Vehicle Warranties and/or vehicle service contracts or plans qualify for a refund if I choose the Buyback or Buyback With Trade-In?**

If you complete a Buyback or Buyback With Trade-In of a Generation One vehicle, you are entitled to a refund for unused portions of any Extended Vehicle Warranty, which includes (1) mechanical breakdown protection contracts, and (2) Audi Care Prepaid Maintenance contracts, for your vehicle if purchased before January 17, 2018 from an authorized Volkswagen or Audi dealer in Canada. The reimbursement, if any, will be prorated to account for any unused months (if the Extended Vehicle Warranty is time-based), service/maintenance events (if the Extended Vehicle Warranty is based on service events), and/or mileage (if the Extended Vehicle Warranty is mileage-based), as applicable.

Any applicable refunds will need to be claimed within 90 days of completing a Buyback or Buyback With Trade-In before the May 31, 2019 claims submission deadline, and within 60 days of completing a Buyback or Buyback With Trade-In thereafter (even if the 60-day period extends past the August 31, 2019 deadline for the claims program). Additional details are provided regarding the process for submitting these claims at Question 30.

**30. How do I submit my claim for an Extended Vehicle Warranty reimbursement?**

The Court-appointed Claims Administrator, RicePoint, will provide a notice letter and send an email to claimants who have completed a Buyback or Buyback With Trade-In to let them know how to access the separate Claims Portal to be used for submitting a claim for a refund of an Extended Vehicle Warranty. You can access the Extended Vehicle Warranty Claims Portal using the same Claim ID, VIN and email address used during the

3.0L Settlement Claims Program. Once logged in to the portal, you will need to fill out information relating to your Extended Vehicle Warranty and may need to upload documents relating to your warranty in order for RicePoint to determine if you are eligible for a reimbursement. Once a completed Extended Vehicle Warranty claim is accepted, RicePoint will issue a cheque to you for the applicable reimbursement amount. If you are unable to submit a claim form electronically, you will have the option of completing a paper claim form. Claimants may call the Canadian Settlement Claims Centre at 1-888-670-4773 to request a paper Claim Form.

**31. Does the Extended Vehicle Warranty have to be from Volkswagen Canada, Audi Canada, or one of their affiliates to be eligible for the reimbursement?**

No, as long as the eligible Extended Vehicle Warranty was purchased from an authorized Volkswagen or Audi dealer in Canada, it may be eligible for the reimbursement. For any non-Volkswagen or non-Audi Extended Vehicle Warranty, you will need to contact your warranty provider to receive a validated refund analysis, which must be submitted with your claim for reimbursement. In addition, in the case of a non-Volkswagen or non-Audi Extended Vehicle Warranty, you must follow the procedures laid out in your contract to obtain a refund of any portion of the Extended Vehicle Warranty that is refundable under the contract.

**GENERATION TWO**

**32. If I am an Eligible Owner of a Generation Two Eligible Vehicle, what benefits can I receive?**

If you are an Eligible Owner (see Question 10) 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** (see Question 45) 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 39) or ceases to be Operable (see Question 40).

**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

**33. If I am an Eligible Seller of a Generation Two Eligible Vehicle, what benefits can I receive?**

If you are an Eligible Seller (see Question 10) who owned a Generation Two vehicle on November 2, 2015 and 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>
VW Touareg	\$3,262.50	\$3,512.50	\$3,762.50	\$3,887.50
Audi Q5	N/A	\$3,662.50	\$3,750.00	\$3,850.00
Audi Q7	\$3,512.50	\$3,812.50	\$3,962.50	N/A
Audi A6	N/A	\$3,762.50	\$4,062.50	\$4,362.50
Audi A7	N/A	\$4,212.50	\$4,512.50	\$4,862.50
Audi A8, A8L	N/A	\$4,975.00	\$5,112.50	\$5,512.50
Porsche Cayenne	\$3,937.50	\$4,262.50	\$4,562.50	\$4,662.50

**34. If I am an Eligible Purchaser of a Generation Two Eligible Vehicle, what benefits can I receive?**

If you are an Eligible Purchaser (see Question 10) 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** (see Question 45) 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 VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc. 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 below. If it was under lease, you are eligible for a **cash payment** of \$1,000 as shown in column B of Table G below. To determine whether this applies to your vehicle, visit <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 40).

**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
VW Touareg	\$3,262.50	\$1,000.00	\$3,512.50	\$1,000.00	\$3,762.50	\$1,000.00	\$3,887.50	\$1,000.00
Audi Q5	N/A	N/A	\$3,662.50	\$1,000.00	\$3,750.00	\$1,000.00	\$3,850.00	\$1,000.00
Audi Q7	\$3,512.50	\$1,000.00	\$3,812.50	\$1,000.00	\$3,962.50	\$1,000.00	N/A	N/A
Audi A6	N/A	N/A	\$3,762.50	\$1,000.00	\$4,062.50	\$1,000.00	\$4,362.50	\$1,000.00
Audi A7	N/A	N/A	\$4,212.50	\$1,000.00	\$4,512.50	\$1,000.00	\$4,862.50	\$1,000.00
Audi A8, A8L	N/A	N/A	\$4,975.00	\$1,000.00	\$5,112.50	\$1,000.00	\$5,512.50	\$1,000.00
Porsche Cayenne	\$3,937.50	\$1,000.00	\$4,262.50	\$1,000.00	\$4,562.50	\$1,000.00	\$4,662.50	\$1,000.00

**35. If I am an Eligible Lessee of a Generation Two Eligible Vehicle, what benefits can I receive?**

If you are an Eligible Lessee (see Question 10) who was leasing a Generation Two vehicle from VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc. 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 below. If your lease remains active when you participate in the Claims Program, by receiving the **Emissions Compliant Repair with Extended Emissions Warranty** (see Question 45) through a recall, you are entitled to a **cash payment** of \$2,000 as shown in column A below.

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, by receiving the **Emissions Compliant Repair with Extended Emissions Warranty** (see Question 45) through a recall, you are entitled to receive a cash payment of \$2,000 as shown in column A of Table H below. You may have an additional option if your vehicle ceases to be Operable (see Question 40). 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 below.



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

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

**36. Why is my Generation Two vehicle not eligible for a Buyback, Buyback With Trade-In or Early Lease Termination?**

In the case of Generation Two vehicles, the U.S. Environmental Protection Agency has already approved an Emissions Compliant Repair (see Question 45) that brings those vehicles into full compliance with the emissions standards to which they were originally certified.

Buybacks and Buyback With Trade-Ins are only available for Generation One vehicles because these vehicles cannot practically be brought into compliance with the emissions standards to which they were originally certified. That is why, if eligible, owners and lessees of Generation One vehicles can choose instead among a Buyback or Buyback With Trade-In (for owners, see Questions 24 and 25) or an Early Lease Termination (for lessees, see Question 23).

**GENERAL**

**37. I owned my Eligible Vehicle on November 2, 2015 and transferred it to my parent, grandparent, child, sibling or spouse. Is the current owner an Eligible Owner?**

If you were the owner of an Eligible Vehicle on November 2, 2015, and have transferred title of your vehicle to a family member, you may be considered an Eligible Seller and the new owner may be considered an Eligible Purchaser.

Alternatively, if you were the owner of an Eligible Vehicle on November 2, 2015, and have transferred title of your vehicle to a family member, the new owner of the vehicle may be considered an Eligible Owner if you waive your right to receive any benefits under the 3.0L Settlement as an Eligible Seller. In this case, your family member may receive the benefits available to Eligible Owners (see Question 19 for Generation One vehicles and 32 for Generation Two vehicles) and the Cash Payment set out in Table A above (see

Question 18) (for Generation One vehicles) or Table E above (see Question 32) (for Generation Two vehicles) would apply. If the new owner is claiming as an Eligible Owner, only one claim will be granted for the Eligible Vehicle.

**38. My Eligible Vehicle was transferred to me by a parent, grandparent, child, sibling or spouse who owned the vehicle on November 2, 2015. Am I an Eligible Owner?**

If your Eligible Vehicle was transferred to you by a family member who owned the vehicle on November 2, 2015, the family member may be considered an Eligible Seller and you may be considered an Eligible Purchaser.

Alternatively, if your Eligible Vehicle was transferred to you by a family member who owned the vehicle on November 2, 2015, you may be considered an Eligible Owner if the family member who transferred the vehicle waives their right to receive any benefits under the 3.0L Settlement as an Eligible Seller. In this case, you may receive the benefits available to Eligible Owners (see Question 19 for Generation One vehicles and 32 for Generation Two vehicles) and the Cash Payment set out in Table A above (see Question 18) (for Generation One vehicles) or Table E above (see Question 32) (for Generation Two vehicles) would apply. If you are claiming as an Eligible Owner, only one claim will be granted for the Eligible Vehicle.

**39. Can I receive benefits if my Eligible Vehicle was totalled?**

If you were the owner of an Eligible Vehicle on November 2, 2015 and the title was transferred to an insurance company before January 17, 2018 because the vehicle was totalled or appraised as a total loss, you may be an Eligible Seller and entitled to receive a cash payment. In the case of a Generation One vehicle, you are entitled to receive a cash payment as shown in Table B above (see Question 19) based on your vehicle's make, model and model year. In the case of a Generation Two vehicle, you are entitled to receive a cash payment as shown in Table F above (see Question 33) based on your vehicle's make, model and model year.

Alternatively, if you were the owner of an Eligible Vehicle on November 2, 2015 and the title was or is transferred to an insurance company on or after January 17, 2018 because the vehicle was totalled or appraised as a total loss, you may be an Eligible Owner and entitled to receive a cash payment. In the case of a Generation One vehicle, you are entitled to receive a cash payment based on your vehicle's make, model and model year payment as shown in Table A above (see Question 18). In the case of a Generation Two vehicle, you are entitled to receive a cash payment based on your vehicle's make, model and model year as shown in Table E above (see Question 32).

**40. Can I receive benefits if my Eligible Vehicle is not Operable?**

In order for Settlement Class Members to receive a Buyback, Buyback With Trade-In, Reduced Emissions Modification or Emissions Compliant Repair, their vehicle must be

Operable when brought in to a Volkswagen, Audi or Porsche dealership—i.e., it must be 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 an Eligible 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. You will not receive Vehicle Value for your vehicle.

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 will, as 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.

#### **41. Can I participate in the 3.0L Settlement if I have a vehicle loan on my Eligible Vehicle?**

Yes. However, if you have a Generation One vehicle and are receiving a Buyback or Buyback With 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, some or all of your cash payment will, as 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.

If available, Loan Forgiveness provides additional assistance to Settlement Class Members with a Generation One vehicle who choose a Buyback or Buyback With 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 Buyback With Trade-In.

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

## **D. APPROVED EMISSIONS MODIFICATION QUESTIONS**

### **42. What is the Approved Emissions Modification?**

Approved Emissions Modification means, in the case of a Generation Two Eligible Vehicle, an Emissions Compliant Repair (see Question 45), or, in the case of a Generation One Eligible Vehicle, a Reduced Emissions Modification (see Question 43).

### **43. 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. 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. EPA. Volkswagen continues to work with U.S. regulators to develop Reduced Emissions Modifications for model year 2009-2012 Generation One vehicles.

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 cash payment in the 3.0L Settlement. These Settlement Class Members are also entitled to one free AdBlue® refill and one free oil change when they receive an offer for the cash payment for the Reduced Emissions Modification.

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 Settlement Class Members.

The Reduced Emissions Modification can be obtained at an authorized dealership 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.

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.

#### **44. What if there is no Reduced Emissions Modification for my Generation One vehicle?**

There will be a Reduced Emissions Modification only if a modification of the emissions system for your Generation One vehicle is approved by the U.S. EPA and available through a Volkswagen or Audi recall in Canada. Volkswagen Group continues to work with U.S. regulators to develop Reduced Emissions Modifications for model year 2009-2012 Generation One vehicles. You can wait to see whether a Reduced Emissions Modification becomes available or choose any other benefit that may be 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 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 18.
- 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 Buyback With Trade-In and receive your cash payment based on your Settlement Class Member category. To receive a Buyback or Buyback With 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 41).

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 21 at Table D, column A).

#### **45. 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 that will bring their vehicle into full compliance with the emissions standards to which it was originally certified. The U.S. Environmental Protection Agency (U.S. EPA) has approved an Emissions Compliant Repair (see Question 17) for all model year 2013-2016 Generation Two vehicles.

Recalls for the Emissions Compliant Repair have launched in Canada and are available at authorized dealerships. The notices were sent by mail and are available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). The notices include a clear and accurate disclosure regarding any of the effects of the Emissions Compliant Repair that may be reasonably important to customers.

Settlement Class Members in possession of their Generation Two vehicle can obtain the Emissions Compliant Repair with Extended Emissions Warranty and claim a cash payment in the 3.0L Settlement.

You can choose to receive the Emissions Compliant Repair through the recall at any time before the end of the Claims Program 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.

#### **46. 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) a 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.

Disclosures about the impacts of the Emissions Compliant Repair on applicable Generation Two vehicles are provided in the recall notice and accompanying booklet available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). In addition, the Extended Emissions Warranty protects against the possibility of the repair causing subsequent problems.

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 and Porsche reserve their right to oppose, additional remedies from the Courts.

#### **47. I have received a notice of recall. What does that mean?**

Before or during the Claims Program in Canada, you may receive a notice of recall inviting you to implement the Approved Emissions Modification for your vehicle. For Generation One vehicles, that is a Reduced Emissions Modification. For Generation Two vehicles, that is the Emissions Compliant Repair.

The notice of recall will be issued for all vehicles for which there is an Approved Emissions Modification, independently of the 3.0L Settlement. A Recall entitles owners and lessees in Canada subject to the recall to receive the Approved Emissions Modification with Extended Emissions Warranty, but does not provide for benefits from the 3.0L Settlement. If you receive a recall and you are also eligible to participate in the 3.0L Settlement, you will still need to make a claim through the Claims Portal to receive the cash payment that is available through the 3.0L Settlement.

If you receive a notice of recall for your **Generation One** vehicle, you can participate in the 3.0L Settlement if you are eligible and choose any benefit that is available to you, subject to the following:

- If you have the Reduced Emissions Modification performed on your vehicle through a recall after the Claims Program begins and before you submit a claim in the Settlement, you will be deemed to have chosen the Reduced Emissions

Modification option and will forego any rights that you may have to choose a Buyback, Buyback With Trade-In or Early Lease Termination. You will, however, retain the right to receive the cash payment based on your Settlement Class Member category (see Question 22)

If you have a **Generation Two** vehicle, you can choose to receive the Emissions Compliant Repair through the recall without losing any right to claim the cash payment that may be available to you in the 3.0L Settlement (see Question 45).

**48. Will a subsequent purchaser know if a vehicle has been modified with the Approved Emissions Modification?**

Yes. The authorized dealer performing the Approved Emissions Modification will install labels under the vehicle hood after the modification is completed. Volkswagen, Audi and/or Porsche will make best efforts to label the vehicle accordingly, consistent with recall procedures.

To the extent that it becomes known to Volkswagen, Audi and/or Porsche that an Eligible Vehicle which has received the Emissions Compliant Repair (for Generation Two vehicles) or a Reduced Emissions Modification (for Generation One vehicles) is not labelled properly, Volkswagen, Audi and/or Porsche will make available, at no cost to the Eligible Claimant, appropriate labels that can be applied to the Eligible Vehicle at the Eligible Claimant's preferred authorized dealer.

**E. SETTLEMENT PROCESS QUESTIONS**

**49. If I am a Settlement Class Member, what rights did I give up?**

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

Because the 3.0L Settlement was approved by the Courts, Settlement Class Members who did not validly opt out of the 3.0L Settlement as determined by RicePoint (see Question 51), have released Volkswagen, Audi and Porsche from the Class Action claims related to the software or auxiliary emission control device in any Eligible Vehicle, including those that they owned or leased on or after November 2, 2015. They also have released Volkswagen, Audi and Porsche for those claims in respect of any Eligible Vehicle that they owned or leased before November 2, 2015 and that they 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 May 31, 2019 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 Questions 55 and 56) 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.**

#### **50. Can I object to the 3.0L Settlement?**

The deadline to object to the 3.0L Settlement elapsed March 19, 2018.

Please note, persons who objected to the 3.0L Settlement are not disqualified from making a claim to receive benefits from the 3.0L Settlement.

#### **51. Can I exclude myself (opt out of) the 3.0L Settlement?**

The deadline to exclude yourself from the 3.0L Settlement by opting out elapsed March 19, 2018.

RicePoint, as the Opt-Out/Objection Administrator, determined that 30 opt-out requests were timely and valid. If you sent an opt-out request, you will receive written notice from RicePoint by email or Canada Post mail advising whether or not you are among the 30 valid opt-outs of the Class Actions.

If you validly opted out, you are not eligible to receive any benefits from the 3.0L Settlement. Because you are no longer a Settlement Class Member, you retain your right to separately sue Volkswagen, Audi and/or Porsche at your own cost.

If you did not validly opt out of the Class Actions, you are bound by the terms of the 3.0L Settlement approved by the Courts and you have given up the right to sue Volkswagen, Audi and/or Porsche for the claims resolved by the 3.0L Settlement (see Question 49).

#### **52. I started an individual/joiner/class action lawsuit against Volkswagen, Audi and/or Porsche, can I proceed with that action?**

If you validly opted out of the Class Actions, you are not a Settlement Class Member and you retain the right to sue Volkswagen, Audi and/or Porsche for the claims resolved by the 3.0L Settlement.

If you did not validly opt out of the Class Actions, you are a Settlement Class Member and you have given up the right to sue Volkswagen, Audi and/or Porsche for the claims resolved by the 3.0L Settlement. If you reside in a province/territory other than Québec and already have an action (other than these Class Actions) pending against Volkswagen, Audi and/or Porsche relating to the same facts underlying the claims resolved by the 3.0L Settlement, you must now take steps to bring the action to an end, with prejudice where available.

If you reside in Québec and have an action (other than these Class Actions) pending against Volkswagen, Audi and/or Porsche relating to the same facts underlying the claims being resolved by the 3.0L Settlement, you are considered as having opted out of the 3.0L Settlement, and may proceed with the separate action, unless you discontinued the litigation by March 19, 2018. Please contact Class Counsel (see Questions 55 and 56) if you want to opt back into the Settlement.

### **53. I started an individual/joiner/class action lawsuit against Volkswagen, Audi and/or Porsche, what do I need to do to participate in the 3.0L Settlement?**

If you started an individual/joiner/class action lawsuit against Volkswagen, Audi and/or Porsche relating to the same facts underlying the claims resolved by the 3.0L Settlement, but did not validly opt out of the Class Actions, you are a Settlement Class Member. You are able to participate in the Claims Program, subject to the following:

- If you reside in a province/territory other than Québec and already have an action (other than these Class Actions) pending against Volkswagen, Audi and/or Porsche in that province/territory relating to the same facts underlying the claims resolved by the 3.0L Settlement, you must now take steps to bring the action to an end, with prejudice where available.
- If you reside in Québec and commenced an action within Québec before March 19, 2018 against Volkswagen, Audi and/or Porsche relating to the same facts underlying the claims being resolved by the 3.0L Settlement, you can participate in the 3.0L Settlement provided you either discontinued the litigation by March 19, 2018 or take steps to opt back into the Settlement (see Question 52).
- If you reside in Québec and commenced an individual or joiner proceeding outside of Québec before March 19, 2018 against Volkswagen, Audi and/or Porsche relating to the same facts underlying the claims being resolved by the 3.0L Settlement, and that proceeding remained in effect as of March 19, 2018, you may submit a claim under the 3.0L Settlement and, upon proof of filing of a discontinuance of the proceeding, be deemed to have elected to opt back into the Settlement Class.

### **54. Can I participate in the 3.0L Settlement if I received the Owner Credit Package?**

Yes. The Owner Credit Package is separate from the 3.0L Settlement. Receipt of the Owner Credit Package from Volkswagen or Audi is not determinative of and does not affect eligibility for the 3.0L Settlement. In addition, if you are eligible for benefits from the 3.0L Settlement, your benefits will be unaffected by your participation in this program. In

the event that you did not receive the Owner Credit Package, because it is separate from the 3.0L Settlement, it will not be included or added to your benefits in the 3.0L Settlement.

**55. 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 Place D'Youville (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</p>	<p><b>Koskie Minsky LLP</b> 900-20 Queen St. W., Box 52 Toronto, ON M5H</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>	

**56. Can I speak to Class Counsel, and does it cost anything?**

You will not be charged for contacting these lawyers (see Question 55).

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.

### **57. Do I need to hire my own lawyer to participate in the 3.0L Settlement?**

No, it is not necessary to hire your own lawyer. You may contact any of the Class Counsel listed under Question 55 to assist you in connection with the 3.0L Settlement at no charge to you. Any fees paid to Class Counsel for their work will be paid by Volkswagen and will not affect your benefits under the 3.0L Settlement. If, however, you choose to hire another lawyer to assist you with the 3.0L Settlement, you will be solely and personally responsible for any fees charged by the lawyer of your choice.

### **58. 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 here and their compensation will not be reduced by legal fees or costs.

## **F. CLAIMS PROCESS AND ADMINISTRATION**

### **59. What are the next steps now that the 3.0L Settlement is approved?**

Starting on **May 8, 2018**, Settlement Class Members in Canada and the U.S. with affected 3.0L diesel vehicles that were first sold or leased in Canada may submit claims for benefits under the 3.0L Settlement on the Claims Portal or by paper claim form, both of which are available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca). Claimants may also call the Canadian Settlement Claims Centre at 1-888-670-4773 to request a paper Claim Form.

If you believe you are included in the 3.0L Settlement, you will have until **May 31, 2019** to submit a complete and valid claim and, if eligible, until **August 31, 2019** to obtain your chosen benefits.

You will be required to submit certain documents and information that are needed to determine your eligibility under the 3.0L Settlement. Once that information is received, your claim will be reviewed for eligibility by the Claims Administrator and, if you are determined to be eligible, you will receive an offer for benefits. The offer will include information on what steps you need to take to receive those benefits.

### **60. What supporting documents do I need to make a claim?**

To submit a claim for benefits under the 3.0L Settlement, 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
- In the case of an owned vehicle, proof of vehicle ownership (a copy of the vehicle's registration certificate or bill of sale);

- In the case of a vehicle leased from VW Credit Canada, Inc. (also known as Volkswagen Finance and Audi Finance) or Porsche Financial Services Canada, Inc., 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.

### **61. What is a VIN and how do I find it?**

A Vehicle Identification Number, also known as 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’. You can enter your 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.

### **62. What do I do if I have more than one Eligible Vehicle?**

If you have more than one Eligible Vehicle, you may submit a claim for each of them. You do not need to submit each claim at the same time. However, all claims for Eligible Vehicles must be submitted by May 31, 2019.

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.

### **63. What are the steps to make a claim?**

The Claims Process will take place in six steps:

- At **Step 1**, based on information you provide online or by telephone, you will obtain information about your available options for benefits. You can proceed at your chosen pace. For example, if you are certain you would like a Buyback or Buyback With Trade-In, you can immediately proceed to submitting the required documentation in Step 2 below. If you wish to take time to consider your options further before proceeding, you can pause the Claims Process at Step 1, with the understanding that you will have until **May 31, 2019** to submit a complete and valid claim and, if eligible, until **August 31, 2019** to obtain your chosen benefit.
- At **Step 2**, once you are ready to proceed with the Claims Process, you will submit a Claim Form that contains certain information about your vehicle along with required documentation, which varies depending on the benefit selected.

Because the benefits require different documentation to be submitted, the Claims Process will prompt you to make an initial non-binding benefit selection that can later be changed. Once your claim is submitted, you become a claimant.

- At **Step 3**, the Claims Administrator will obtain information about your outstanding Loan Obligation (if and as applicable), verify the documents sent by you, separately audit such documents and determine your eligibility or ineligibility to participate in the 3.0L Settlement.
- At **Step 4**, if you are deemed to be an Eligible Claimant, an offer that details the benefit chosen by you will be delivered to you by the Claims Administrator. The offer will be conditional in the case of a Buyback or Buyback With Trade-In.
- At **Step 5**, you will confirm your benefit selection by accepting the offer, execute an Individual Release, and, if necessary, schedule an appointment at your preferred authorized dealership. In the case of a Buyback or Buyback With Trade-In, you will have a Pre-Surrender Confirmation Call no more than 20 days before your appointment and will receive an adjustment to your conditional offer if applicable.
- At **Step 6**, you will obtain your benefit.

#### **64. How can I submit a claim?**

You may submit your claim in one of two ways:

- **Option One (Preferred) – Submit a Claim Electronically:** If you have registered online, you may submit an online Claim Form to the Claims Administrator. To do so, you must upload on the Claims Portal the required information and documentation based on your benefit selection. Documentation required may include (if applicable) a driver's license or other government-issued photo identification, the dates that you owned or leased your vehicle, current vehicle registration and financial consent forms. Additional documentation may be required to verify eligibility depending on the nature of the claim. The Claims Administrator will send you an email confirmation once all necessary documentation in support of your claim has been received electronically. If you submit a claim electronically, you will be able to ascertain what documents, if any, are missing by consulting the Claims Portal at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca).
- **Option Two – Submit a Claim by Mail:** you may submit a claim to the Claims Administrator by completing a paper Claim Form and submitting it by mail along with all required documentation. The paper Claim Form will require the same information and documentation as the online Claim Form. Claimants may call the

Canadian Settlement Claims Centre at 1-888-670-4773 to request a paper Claim Form.

In special circumstances, different and additional documentation may be required to establish eligibility for, among others, family transfers, military or government personnel continuing to serve overseas at the time of submitting a claim, estates of deceased persons or any issues arising with respect to liens, bankruptcy and stolen vehicles.

**65. What happens after I make a claim? What are the anticipated processing timelines?**

If your claim is made by May 31, 2019, you will have until August 31, 2019 to obtain your settlement benefit; any applicable appointment must be scheduled at an authorized dealer during that period.

After you make a claim, the Claims Administrator will review the Claim Form, and verify the documents sent by you for completeness and adequacy to determine whether there are any issues or deficiencies in your documents or information. If an issue or deficiency is identified with your documents or information, or additional information is needed to confirm your eligibility, you will be notified by the Claims Administrator that additional document(s) and/or information is needed.

Based on information and documents collected, the Claims Administrator will make a determination about your eligibility (or ineligibility) to participate in the 3.0L Settlement.

Once your eligibility is verified, you become an Eligible Claimant. Claimants who are not deemed eligible to receive benefits will be sent a decision in writing by the Claims Administrator within 15 days of the determination being made.

If you are deemed to be eligible, an offer that details the benefit chosen by you will be delivered to you by the Claims Administrator. The offer will be conditional in the case of a Buyback or Buyback With Trade-In.

If you select a Buyback, Buyback With Trade-In or Surrender For Inoperability, and your vehicle is subject to a loan obligation, the Claims Administrator will require payoff instructions from you and will contact the lender to receive the loan balance and payoff procedure. In some cases, the accountholder, who is typically the Claimant, may need to assist the Claims Administrator in determining the loan information and payoff instructions. The Claims Administrator will notify the Claimant if the accountholder's assistance is required.

If you are an Eligible Claimant in possession of an Eligible Vehicle, a visit to a authorized dealership will be required to obtain your chosen benefit under the 3.0L Settlement, unless a recall for an Approved Emissions Modification has already been completed. For more information about scheduling your appointment to obtain your chosen benefit(s), please refer to Schedule I to the 3.0L Settlement Agreement available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca).

Appointments for a Buyback, Buyback With Trade-In, Surrender For Inoperability or Approved Emissions Modification (where available) will be arranged as expeditiously as possible but, in any event, appointments within 90 days of an Eligible Claimant's acceptance of an offer will be offered. Appointments for an Early Lease Termination will also be arranged as expeditiously as possible but, in any event, appointments within 45-60 days of acceptance will be offered. When an appointment to obtain the selected benefit becomes available, the Eligible Claimant will be notified by email and/or mail, depending on the Eligible Claimant's stated preference. The Eligible Claimant may then schedule an appointment online or directly over the phone by calling the Canadian Settlement Claims Centre's Appointment Line at 1-888-670-4746 and, in the case of an Approved Emissions Modification, directly with their preferred authorized dealership.

#### **66. How do I get more information about the status of my claim?**

Information on the status of your claim can be found by entering your information into the Claims Portal at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca), by calling the Canadian Settlement Claims Centre at 1-888-670-4773, or by emailing the Claims Administrator at [vw@ricepoint.com](mailto:vw@ricepoint.com).

#### **67. I received my offer letter. What do I do?**

To accept an offer for benefits, you must complete and sign your offer letter and the individual release, and then return both documents by uploading copies to the Claims Portal at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca), or mailing a copy to Volkswagen/Audi/Porsche Class Action Administration, P.O. Box 7071, 31 Adelaide Street East, Toronto, ON M5C 3H2.

**You must send both your offer letter and the individual release before your acceptance of the offer is considered complete. The release becomes effective and binding only when you receive your settlement benefits.**

#### **68. Can I appeal decisions made by the Claims Administrator?**

You may appeal decisions by the Claims Administrator of your ineligibility to receive benefits under the Settlement Agreement, or if you believe that your offer letter includes a miscategorization or calculation error of your benefits. If you wish to appeal your offer of benefits, **do not sign and return your offer letter.**

The following determinations by the Claims Administrator may be appealed:

- a) the Claimant's eligibility to receive benefits under this 3.0L Settlement Agreement;
- b) the Claimant's settlement benefit entitlement;
- c) the Inoperability of a Claimant's Eligible Vehicle and, if applicable, the ineligibility of the Claimant's Eligible Vehicle for a Buyback or Buyback With Trade-In, or its eligibility for reduced compensation only; or



- d) the denial of a request made during the Claims Period, or up to 6 months after the August 31, 2019 Claims Period Deadline, to reissue a stale dated, non-negotiable cheque for payment of a claim.

No appeal or other review is available for disputing Damages Payments or Repair Payments, the reliance on CBB data for determining Vehicle Value or Fair Market Value, or any other standard under the 3.0L Settlement Agreement, except to the extent that a miscategorization of the Claimant's benefits or a calculation error is alleged.

In order to initiate an appeal, you must first notify the Claims Administrator in writing within 10 days of the issuance of the decision that you are appealing. The Claims Administrator will deliver your appeal for review to Class Counsel and lawyers representing Volkswagen, Audi and/or Porsche. You will be advised of the outcome of this review in writing. In the event that you are not satisfied with the outcome, you will have 30 days from this notice to advise the Claims Administrator in writing that you wish to appeal to the arbitrator.

Class Counsel and Volkswagen, Audi and/or Porsche will receive appeals to the arbitrator and have the opportunity to respond. The Claims Administrator will provide to the arbitrator all documents and responses to the appeal, and the arbitrator will render a final determination in writing within 30 days of receipt of the materials.

Please note that the requirements for submitting an appeal to the arbitrator include providing for payment of a \$150 filing fee. To satisfy this requirement, you may submit to the Claims Administrator a certified cheque or money order for the amount, or provide a signed written agreement that, if your appeal is denied by the arbitrator, you agree to a \$150 filing fee being deducted from your payment of settlement benefits. This fee will be reimbursed to you and/or not payable if your appeal is granted. Notices of appeal to the Claims Administrator must include the following information:

- Your name, address, and telephone number;
- The VIN of your affected vehicle;
- Your claim reference number; and
- A brief statement explaining your reasons for appealing.

You may send your notice of appeal by email to [vw@ricepoint.com](mailto:vw@ricepoint.com) or by mail to Volkswagen/Audi/Porsche Class Action Administration, P.O. Box 7071, 31 Adelaide Street East, Toronto, ON M5C 3H2.

For more information on the Appeal Process, see Sections 6.7 and 6.8 of the 3.0L [Settlement Agreement found online at www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca).

#### **69. I have accepted my offer for benefits. What happens next?**

If you currently own or lease your Eligible Vehicle, the Claims Administrator will notify you after receiving your accepted offer and signed individual release that you may schedule your appointment with an authorized dealership for a Buyback, Buyback With Trade-In, Early Lease Termination, or Surrender For Inoperability online at

[www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) or by calling the Canadian Settlement Claims Centre's Appointment Line at 1-888-670-4746.

An appointment within 45, 60 or 90 days, as applicable, will be offered (see Questions 65 and 83). You should bring your vehicle to the selected dealership at the scheduled time and the dealership's designated 3.0L Settlement Specialist will handle the return process. Once your appointment is scheduled, a Pre-Surrender Confirmation Call will be scheduled to take place no more than 20 days before your appointment.

If you complete the transaction at an authorized dealership in Canada on the day of your appointment, you will receive any applicable payment by cheque at the dealership. If you complete the transaction at an authorized dealership in the United States, a cheque for the applicable payment amount (in Canadian dollars) will be mailed to you within 15 days of that completion date.

If you select an Approved Emissions Modification, once you have been notified by the Claims Administrator, you may schedule an appointment with your preferred authorized dealership by contacting them directly. Upon completion of the Approved Emissions Modification and receiving your accepted offer and signed individual release, the Claims Administrator will send your payment by mail within 15 days of receiving your accepted offer and signed individual release. If you have already received the Approved Emissions Modification at the time of submitting your claim, a cheque will be mailed to you within 15 days of receiving your accepted offer and signed individual release.

If you formerly owned or leased your Eligible Vehicle, the Claims Administrator will send your payment by mail within 15 days of receiving your accepted offer and signed individual release.

## **70. When will I receive my payment for benefits?**

If you currently own or lease your Eligible Vehicle and choose a Buyback, Buyback With Trade-In, Early Lease Termination or Surrender For Inoperability, you will receive any applicable payment by cheque at the dealership if you complete the transaction in Canada and on the day of your appointment. If you complete the transaction at an authorized dealership in the United States, a cheque for the applicable payment amount (in Canadian dollars) will be mailed to you within 15 days of that completion date.

If you currently own or lease your Eligible Vehicle and choose to receive an Approved Emissions Modification, a cheque for the applicable payment amount will be mailed to you within 15 days of completing the modification.

If you have already received the modification at the time of submitting your claim, a cheque will be mailed to you within 15 days of receiving your accepted offer and signed individual release.

If you formerly owned or leased your Eligible Vehicle, the Claims Administrator will send your payment to you within 15 days of receiving your accepted offer and signed individual release.

### **71. Will my 3.0L Settlement payment be taxed?**

There is no intended tax effect to Eligible Claimants from payments made pursuant to the 3.0L Settlement Agreement, except as would apply to a vehicle trade-in in the ordinary course of business. You are encouraged to consult a tax advisor for assistance regarding any tax ramifications of the 3.0L Settlement for your particular circumstances.

### **72. Can I change my mind about the benefits I choose?**

Yes. Claimants choosing a Buyback, Buyback With Trade-In, Early Lease Termination, Approved Emissions Modification or Surrender For Inoperability can change their choice of benefits until 20 days prior to their appointment for the transaction. Certain exceptions apply. Please refer to Section 6.3 of the [3.0L Settlement Agreement](#) available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) for details.

Changing the selection of benefits will affect the timing for receiving a benefit and may require the submission of additional documentation to the Claims Administrator to verify eligibility for the alternative benefit.

### **73. When is the deadline to claim my benefits?**

You will have until May 31, 2019 to submit and complete a valid claim. If you are eligible, you will have until August 31, 2019 to obtain your chosen benefit.

### **74. Will my out-of-pocket costs to get my vehicle to a dealership be covered?**

No. Volkswagen, Audi and Porsche will not reimburse Eligible Claimants for out-of-pocket expenses.

Eligible Claimants must bring their vehicle to their preferred authorized dealership at their own expense.

### **75. How do I know if there is a lien on my vehicle?**

You can visit [www.ppsa.ca](http://www.ppsa.ca) to search for any outstanding liens on your vehicle in Canada. This is a private website and you will be charged a fee on top of the government disbursement associated with the search.

Alternatively, each Province and Territory has a tool that allows you to search for any outstanding liens on your vehicle. You can find more information by visiting the websites below:

<b>Province/Territory</b>	<b>Website</b>
Alberta	<a href="http://www.servicealberta.gov.ab.ca/find-registrations.cfm">http://www.servicealberta.gov.ab.ca/find-registrations.cfm</a>
British Columbia	<a href="https://www2.gov.bc.ca/gov/content/employment-business/business/managing-a-">https://www2.gov.bc.ca/gov/content/employment-business/business/managing-a-</a>

	<a href="https://www2.gov.bc.ca/gov2/business/permits-licences/bc-registry-services-personal-property-registry/bc-registry-services-personal-property-registry-search">business/permits-licences/bc-registry-services-personal-property-registry/bc-registry-services-personal-property-registry-search</a>
Manitoba	<a href="https://www.tprmb.ca/ppr/actions/mainPageInitAction">https://www.tprmb.ca/ppr/actions/mainPageInitAction</a>
New Brunswick Newfoundland and Labrador Northwest Territories Nova Scotia Nunavut Prince Edward Island Yukon	<a href="https://www.acol.ca/en/pprs/lien-check">https://www.acol.ca/en/pprs/lien-check</a>
Ontario	<a href="https://www.ontario.ca/page/register-security-interest-or-search-lien-access-now">https://www.ontario.ca/page/register-security-interest-or-search-lien-access-now</a>
Quebec	<a href="https://www.rdprm.gouv.qc.ca">https://www.rdprm.gouv.qc.ca</a>
Saskatchewan	<a href="https://www.isc.ca/SignedInHome/Products/Pages/Saskatchewan-Personal-Property-Registry.aspx">https://www.isc.ca/SignedInHome/Products/Pages/Saskatchewan-Personal-Property-Registry.aspx</a>

## 76. What is the Pre-Surrender Confirmation Call?

If you choose a Buyback, Buyback With Trade-In, Early Lease Termination or Surrender For Inoperability, you will receive a telephone call from the Claims Administrator that will take place no more than 20 days prior to your scheduled appointment for your transaction. Please provide a telephone number where you are easy to reach and make yourself available for the call in order to provide your vehicle's mileage at that time. Your appointment cannot proceed and will be cancelled without this call.

If you choose a Buyback or Buyback With Trade-In, the Claims Administrator will use your updated mileage information from the Pre-Surrender Confirmation Call to calculate your Vehicle Value (see Question 27) and, if applicable, Fair Market Value (see Question 28).

If you choose an Early Lease Termination, the Claims Administrator will use your updated mileage information from the Pre-Surrender Confirmation Call to determine any fee for excess mileage that applies for kilometres driven beyond the total mileage allowed under the full term of your lease agreement based on the charge in your lease agreement for any such kilometres.

Please note that driving your vehicle more than 2,000 kilometres between your Pre-Surrender Confirmation Call and your appointment may result in a reduction in Vehicle Value and Fair Market Value, or an increased excess mileage fee, as applicable.

## 77. Can Volkswagen, Audi or Porsche offer me any other incentives?

Yes. Nothing in the 3.0L Settlement Agreement prevents Volkswagen, Audi or Porsche or their authorized dealers from offering any additional incentives, such as special offers to reduce the price on a future Volkswagen, Audi or Porsche purchase. However, Volkswagen, Audi and Porsche may not offer Settlement Class Members other incentives or trade-in options instead of the options provided by the 3.0L Settlement and the trade-in credit of a Generation One Eligible Vehicle must be its Fair Market Value for purposes of a Buyback With Trade-In. In addition, Volkswagen, Audi and Porsche may not offer any incentive to not participate in the Claims Program.

**78. How and when can I schedule an appointment for a Buyback or Buyback With Trade-In?**

The Claims Program will begin on May 8, 2018. After submitting a claim for Buyback or Buyback With Trade-In and accepting your offer (see Questions 24 and 25), you may schedule your appointment with your preferred authorized dealership online at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) or by calling the Canadian Settlement Claims Centre's Appointment Line at 1-888-670-4746. Buybacks with Trade-In must take place at an authorized dealership in Canada. While the timing of appointments will depend upon the availability of your preferred authorized dealership, you will be offered an appointment within 90 days of returning your offer. Dealerships are not able to schedule appointments directly with Eligible Claimants for any transaction other than a recall for an Approved Emissions Modification.

**79. If I choose a Buyback With Trade-In, can I trade my Audi vehicle for a Volkswagen vehicle? Can I trade my Volkswagen vehicle for an Audi vehicle?**

Yes. You can trade in your Volkswagen or Audi vehicle for any new or used Volkswagen or Audi vehicle, or other used Volkswagen Group vehicle (including Porsche). You should schedule your Buyback With Trade-In appointment at the authorized dealership in Canada where you intend to purchase your new or used replacement vehicle.

**80. Can I trade my Volkswagen or Audi vehicle for a Porsche vehicle?**

Yes, as long as you trade your vehicle in for a used Porsche that is available for sale at an authorized Volkswagen or Audi dealership in Canada.

**81. How and when can I schedule an appointment for Early Lease Termination?**

The Claims Program will begin on May 8, 2018. After submitting a claim for Early Lease Termination and accepting your offer (see Question 23), you may schedule your appointment online with your preferred authorized dealership in Canada at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) or by calling the Canadian Settlement Claims Centre's Appointment Line at 1-888-670-4746. While the timing of appointments will depend upon the availability of your preferred authorized dealership, you will be offered an appointment within 45-60 days of returning your offer. Early Lease Termination must take place at an authorized dealership in Canada.

Please note that you are responsible for any fees for excess mileage, wear and use, and any other assessments owed under your lease agreement. During your Pre-Surrender Confirmation Call, you will be asked to provide your vehicle's mileage (see Question 76). The Claims Administrator will use this information to determine any fee for excess mileage that applies for kilometres driven beyond the total mileage allowed under the full term of your lease agreement based on the charge in your lease agreement for any such kilometres.

**82. Do I have to check with VW Credit Canada, Inc. or Porsche Financial Services Canada, Inc. before terminating my lease?**

No. You do, however, need to make a claim for Early Lease Termination under the 3.0L Settlement.

**83. How and when can I schedule an appointment for a Surrender For Inoperability?**

The Claims Program will begin on May 8, 2018. After submitting a claim for a Surrender For Inoperability and accepting your offer (see Question 40), you may schedule your appointment with your preferred authorized dealership online at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca) or by calling the Canadian Settlement Claims Centre's Appointment Line at 1-888-670-4746. While the timing of appointments will depend upon the availability of your preferred authorized dealership, you will be offered an appointment within 90 days of returning your offer.

Please note that you must bring your vehicle to your preferred authorized dealership at your own expense.

**84. How and when can I schedule an appointment for an Approved Emissions Modification?**

The Claims Program will begin on May 8, 2018. For Eligible Claimants in possession of an Eligible Vehicle, a visit to an authorized dealership will be required to obtain an Emissions Compliant Repair or, if available, a Reduced Emissions Modification (collectively, the "Approved Emissions Modifications"), unless you have already completed a recall for an Approved Emissions Modification.

Appointments must be scheduled by the Eligible Claimant directly with an authorized dealership of the same brand as their Eligible Vehicle in order to ensure the availability of service department staff.

Appointments for Approved Emissions Modification will be arranged as expeditiously as possible, but, in any event, appointments within 90 days of an Eligible Claimant's acceptance of an offer will be offered, subject to availability of the recall for the Reduced Emissions Modification.

**85. What should I expect at my Buyback, Buyback With Trade-In or Early Lease Termination Appointment?**

Your appointment for a Buyback, Buyback With Trade-In or Early Lease Termination should be straightforward. When you arrive at your preferred authorized dealership, if in Canada, please ask for the Settlement Specialist. The Settlement Specialist is a representative of Volkswagen Group Canada that supports Canadian dealers with closing settlement transactions. The Settlement Specialist will verify the required Government-issued photo IDs, verify the vehicle's VIN, and document the vehicle mileage and physical condition at the time of vehicle surrender. The Settlement Specialist will also collect any required documentation from you, such as a Power of Attorney, if applicable.

If you are completing a Buyback or Buyback With Trade-In transaction, the Settlement Specialist will provide you with an Odometer Disclosure Statement and a transfer of vehicle registration document and you will be asked to review and sign those documents. After all documentation has been reviewed and verified, the Settlement Specialist will provide you with a settlement transaction receipt and, if applicable following lender payments for any outstanding vehicle loan, a cheque, provided your vehicle mileage at the time of the appointment is within the 2,000km allowance.

If you are completing your Buyback appointment in the U.S., a similar appointment process will be conducted by the authorized U.S. dealer, except that any applicable takeaway cash payment will be paid by cheque mailed within 15 days of closing your transaction.

#### **86. What should I expect at my Reduced Emissions Modification or Emissions Compliant Repair Appointment?**

Your appointment for a Reduced Emissions Modification or an Emissions Compliant Repair will be like other vehicle service appointments. When you arrive at your preferred authorized dealership, please let them know that you are there for a Reduced Emissions Modification or an Emissions Compliant Repair. Once the Reduced Emissions Modification or Emissions Compliant Repair has been completed on your vehicle, the Claims Administrator will be notified that the modification has been completed and, if you have already completed the Claims Process, the Claims Administrator will trigger payment to you.

While your vehicle is receiving its Reduced Emissions Modification or Emissions Compliant Repair, the dealer will provide you with a loaner vehicle free of charge.

#### **87. If I am asked to pay for repairs on my vehicle in order for the Reduced Emissions Modification or Emissions Compliant Repair to be performed, what should I do?**

In order for the Reduced Emissions Modification or Emissions Compliant Repair to work properly, all parts of the emissions system must be in working condition. Volkswagen Group Canada has put in place a Goodwill Program for its Volkswagen and Audi 3.0-litre diesel vehicles to take care of the cost of certain repairs and replacement of parts whose malfunction is causing the "Check Engine" light of your vehicle to turn on at the time of coming in to receive the Reduced Emissions Modification or Emissions Compliant Repair.

This program is designed to work so that you will not be asked by your preferred authorized dealership to pay for eligible labour and parts replacement that are deemed necessary before the Reduced Emissions Modification or Emissions Compliant Repair is performed.

If you are asked by your preferred Volkswagen or Audi authorized dealership to pay for labour and parts replacement in order to perform the Reduced Emissions Modification or Emissions Compliant Repair, here are steps to follow:

- 1) Ask your preferred Volkswagen or Audi authorized dealership if your case was submitted to Volkswagen Group Canada for eligibility under the Goodwill Program. If it has not yet been submitted, ask for this step to be performed and to receive the decision.
- 2) If you have already completed the Emissions Compliant Repair and paid for Check Engine light repairs at that time, Volkswagen Group Canada is working with its authorized Volkswagen and Audi dealers to review repair service histories to identify these customers. Once this review process is completed, reimbursement cheques will be mailed out. If a customer does not hear from Volkswagen Group Canada by July 2018, they can contact Volkswagen Group Canada's Customer Care Line at 1-800-822-8987 to submit for review a claim for reimbursement.
- 3) Contact the Claims Administrator, RicePoint, if repairs for which you are asked to pay in order for the Reduced Emissions Modification or Emissions Compliant Repair to be performed on your vehicle are not covered by the Goodwill Program. RicePoint will escalate your case to Volkswagen Group Canada and Class Counsel for review.

In most scenarios an extended warranty previously offered by Porsche Cars Canada would address labour and parts replacement deemed necessary in order to perform the Emissions Compliant Repair. If you are asked by your preferred Porsche authorized dealership to pay for labour and or parts replacement in order to perform the Emissions Compliant Repair, here are steps to follow:

- 1) Ask your preferred Porsche authorized dealership if your case was submitted to Porsche Cars Canada for coverage under a goodwill program. If it has not yet been submitted, ask for this step to be performed and to receive the decision.
- 2) If you have already completed the Emissions Compliant Repair and paid for Check Engine light repairs at that time contact Porsche Cars Canada's Customer Care Line at 1-800-PORSCHE to submit for review a claim for reimbursement.
- 3) If repairs you have paid for or are asked to pay for in order for the Emissions Compliant Repair to be performed on your vehicle are not covered by an extended warranty previously offered by Porsche Cars Canada or under goodwill contact the



Claims Administrator, RicePoint. RicePoint will escalate your case to Porsche Cars Canada and Class Counsel for review.

### **88. I have additional questions. Who should I call?**

More detailed information about your options under the 3.0L Settlement is available at [www.VWCanadaSettlement.ca](http://www.VWCanadaSettlement.ca), or by calling the Canadian Settlement Claims Centre at 1-888-670-4773.

For more information about your legal rights under the 3.0L Settlement, you may 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.

### **89. How do I get more information?**

The FAQ on this website provides only a summary of some of the terms of the 3.0L Settlement Agreement. To the extent that there is any conflict between the information provided in the FAQ and the Settlement Agreement, the Settlement Agreement applies.

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