

QUEBEC SETTLEMENT APPROVAL HEARING NOTICE

NOTICE OF PROPOSED SETTLEMENT OF XARELTO® LITIGATION

This Notice contains a summary of some of the terms of the Settlement Agreement dated October 27th, 2025. All capitalized terms not otherwise defined have the meaning ascribed to them in the Settlement Agreement. If there is a conflict between the provisions of this Notice and the Settlement Agreement, the terms of the Settlement Agreement shall prevail.

THE CLASS ACTION

A Canada-wide settlement has been reached in a class action relating to the prescription drug Xarelto® (the “**Settlement**”). On July 22, 2020, the Superior Court of Québec authorized a class action in the judicial district of Montréal in the case of *Gagnon vs. Bayer Inc. et al.*, court file no. 500-06-000732-152 (the “**Proceeding**”). A similar class action was certified in the Court of King’s Bench for Saskatchewan for residents of Canada outside of Québec.

The Proceeding raised various allegations against the Defendants and sought damages on behalf of residents of Québec for harm and injuries that were allegedly related to the use of Xarelto®. The Defendants deny the allegations made in the Proceeding, make no admission as to the truth of these allegations, and deny any wrongdoing.

The allegations made by the Plaintiff have not been proven in Court and should not be considered in any way to be medical advice. This Notice advises you of the hearing that will be held to decide whether the Settlement Agreement should be approved (the “**Settlement Approval Hearing**”). You may attend the Settlement Approval Hearing. You can review the originating documents for the Proceeding, as well as the Settlement Agreement and related documents at the settlement website: www.mnp.ca/xarelto-settlement, or you can contact the Court appointed Claims Administrator, MNP Ltd., at the address listed below.

WHO IS INCLUDED?

An authorization order has been granted for the following class (the “**Québec Class**”) and, if the Settlement Agreement is approved, it will apply to:

All persons residing in Québec who were prescribed and have ingested the drug Xarelto® (rivaroxaban) from January 1, 2008 to October 27, 2025, and their successors, assigns, family members, and dependants

A separate notice that applies to Canadian residents, other than residents of Québec, who were prescribed and ingested Xarelto® can be found at www.mnp.ca/xarelto-settlement.

WHAT IS THE PROPOSED SETTLEMENT?

The Settlement provides for the creation of a settlement fund of at least \$4.5 million (CDN), and up to \$5.25 million (CDN) depending on the number of Approved Claims, which will be used to pay compensation for Approved Claims, Provincial Health Insurer Claims, Administration Expenses, Class Counsel Fees and Disbursements and any applicable taxes. Payments to approved Claimants will be made to Class Members who meet the criteria described below within the specified timeframes. Each category of injury will be assigned points by the Claims Administrator subject to various eligibility criteria. Net settlement proceeds will be allocated among the Approved Claims in proportion to the cumulative points each Claimant is awarded under the Compensation Protocol described in the Settlement Agreement. Not all Class Members will be eligible for compensation.

If you are a member of the Québec Class as described above, you may be eligible for compensation if, on or before the expiry of the Claim Period, which will be posted on the settlement website, you submit a Claim Form with supporting medical, pharmaceutical, or other documentation that establishes that you or a family member was prescribed Xarelto® in Canada before October 27th, 2025 (“**Primary Claimant**”), and the Primary Claimant:

- (a) experienced a bleeding event that led to the Primary Claimant’s death, resulted in a brain injury or other significant organ damage with long-term cognitive or physical impairment, or required at least 24 hours of hospitalization; and
- (b) used Xarelto® within 24 hours before experiencing the bleeding event.

Supporting documentation to establish the prescription and use of Xarelto® includes medical, pharmacy, and other records that Xarelto® (or before November 2023, rivaroxaban) was prescribed and dispensed by a pharmacy. As more fully described in the Compensation Protocol, in some cases, a statement by a Claimant or his or her physician may suffice to establish the prescription and use of Xarelto®.

To be eligible for compensation as a family member of a Primary Claimant, evidence must be provided of the requisite relationship. A comprehensive list of eligible **Family Claimants** is located at www.mnp.ca/xareltosettlement.

The Claims Administrator is responsible for determining the validity of Claims and for allocating points to Approved Claims based upon the severity of the bleeding events. In special circumstances, such as young age of the primary claimant, devastating injuries, complete loss of ability to work, etc., an additional amount may be awarded from a Special Circumstances Fund. The Claims Administrator’s decisions are final and may not be appealed.

If the Settlement is approved, Class Counsel will make an application for Class Counsel Fees and Disbursements of at least \$1,350,000 and up to \$1,575,000, plus taxes, to be paid from the Settlement Amount. Approval of the Settlement Agreement is not contingent on the outcome of any application regarding Class Counsel Fees and Disbursements.

RIGHT TO PARTICIPATE OR OPT OUT

If you are a member of the Québec Class and wish to participate in the Settlement, you do not need to do anything at this time.

If you are a member of the Québec Class who was prescribed and has ingested Xarelto® prior to October 1st, 2020, you may **not** opt out of this class action.

If you are a member of the Québec Class who was prescribed and has ingested Xarelto® between October 1st, 2020 and October 27th, 2025 and if you do not wish to participate in the Settlement, then you must opt out of this class action. Opt-Out Forms are available at www.mnp.ca/xareltosettlement or by contacting MNP Ltd. at the address below, and must be sent to the Claims Administrator and to the registry of the Superior Court of Québec, District of Montréal, at 1 Notre-Dame Street East, Montréal, Québec, H2Y 1B6, by regular mail. The deadline to opt out of the Settlement and the Proceeding by transmitting an Opt-Out Form to both the Claims Administrator and the registry of the Superior Court of Québec at the above-mentioned address is **March 10th, 2026**.

Members of the Québec Class who do not opt out will be bound by the Settlement Agreement and the releases in it and will be entitled to share in any of the benefits that may become available to them as Québec Class Members, provided that they proceed within the timeframes provided for in the Settlement Agreement to advance their claims.

The Settlement provides that all Class Members who do not validly opt out from this class action will release and forever discharge the Defendants and other entities from all legal claims that arise from, or relate in any way to, the facts and allegations made in this class action regarding Xarelto®, including claims relating to bleeding-related injuries. Class Members who do not validly opt out from this class action will not be permitted to start any other legal proceeding based on those allegations.

SETTLEMENT APPROVAL HEARING

In order for the Settlement to become effective, it must be approved by the Québec Court. The Québec Court must be satisfied that the Settlement Agreement is fair, reasonable, and in the best interest of the Class Members. The Settlement Approval Hearing has been scheduled on **May 19, 2026 at 9:15 A.M. in room 17.09 at the Montrel Courthouse** (1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6).

If the Settlement Approval Hearing is adjourned and/or if the hearing will be held virtually, details will be posted on the settlement website: www.mnp.ca/xareltosettlement.

If the Settlement Agreement is not approved by the Québec Court in a form agreed to by the Parties to the Proceeding, the Settlement Agreement shall terminate, and its terms shall no longer be binding on Class Members. In that case, all parties shall be restored to their pre-Settlement Agreement positions.

OBJECTING TO THE PROPOSED SETTLEMENT AND OPPORTUNITY TO APPEAR

If you wish to object to the proposed Settlement Agreement, you must submit a written objection no later than 5:00 P.M. PST on **March 10th, 2026**. The following information must be included in the written objection delivered to Class Counsel:

- (a) Your full name, current mailing address, fax number, telephone number, and email address;
- (b) A brief statement of your reasons for the objection;
- (c) A declaration that you believe you are a member of the Québec Class and the reason for that belief; and
- (d) A statement about whether you intend to appear at the Québec Settlement Approval Hearing and, if so, if you intend to appear by legal counsel and, if by counsel, the name, address, telephone number, fax number, and email address of your legal counsel.

Your written objection must be sent to the Claims Administrator by no later than **March 10th, 2026** at the address listed at the end of this Notice. The Claims Administrator will file copies of all objections with the Québec Court.

You may also attend the Québec Settlement Approval Hearing on the date noted above and, if you have submitted a written objection, you may request to make oral submissions to the Québec Court.

NOTICE OF SETTLEMENT APPROVAL

If the proposed Settlement Agreement is approved, a notice of approval will be published on www.mnp.ca/xareltosettlement and otherwise made available as ordered by the Québec Court. Class Members will have a limited amount of time to submit a claim for compensation. If the proposed Settlement Agreement is approved, a downloadable version of the Claim Package, including the Claim Form, will be made available online at www.mnp.ca/xareltosettlement or, alternatively, a Claim Package can be requested from the Claims Administrator by e-mail at: xareltosettlement@mnp.ca, by telephone at (877) 500-0792 or by regular mail at the address listed below. If you intend to submit a claim under the proposed Settlement Agreement, you must do so on or before the expiry of the Claim Period, which will be posted on the settlement website if the proposed Settlement Agreement is approved: www.mnp.ca/xareltosettlement.

CLASS COUNSEL IS:

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CLAIMS ADMINISTRATOR AND MORE INFORMATION:

For more information on the status of the Québec Settlement Approval Hearing or on how to opt out of, comment on, or object to the Settlement Agreement, or to view the Settlement Agreement, visit www.mnp.ca/xareltosettlement which will be periodically updated with information on the settlement approval process and the Proceeding.

You should consult the Settlement Agreement at the settlement website www.mnp.ca/xareltosettlement or contact Class Counsel or MNP Ltd. for specific details as to your rights and obligations under the Settlement Agreement.

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PLEASE DO NOT CONTACT THE DEFENDANTS ABOUT THESE PROCEEDINGS.

The publication of this notice to class members has been approved and ordered by the Québec Court.