## SNC-LAVALIN GROUP INC. SECURITIES LITIGATION

Ontario Superior Court of Justice (Toronto, Ontario), Court File No. CV-12-453236-00CP Québec Superior Court File No. 500-06-000650-131

### CLAIM FORM

### I. GENERAL INSTRUCTIONS - PLEASE READ CAREFULLY

- 1. This Claim Form is directed to the following Class or Class Members: all persons and entities, wherever they may reside or be domiciled, other than Excluded Persons and Opt-Out Parties (as defined below), who acquired SNC securities during the period from and including November 6, 2009 to and including February 27, 2012 (the "Class Period").
- 2. If you are NOT a member of the Class, as defined above, PLEASE DO NOT submit a Claim Form.
- 3. To make a claim for compensation from the settlement in the above noted action, you must complete and, on page 6, sign the Claim Form. If you fail to file a properly addressed Claim Form, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Amount created in connection with the settlement.
- 4. A separate Claim Form must be filed for each account in which common shares of SNC-Lavalin Group Inc. ("SNC") were held.
- 5. Only your SNC common shares acquired during the Class Period are eligible to potentially recover under the settlement. Your sales or unsold shares held up to the time of your claim will be used for purposes of calculating your Net Loss under the Distribution Protocol.
- 6. Submission of a Claim Form does not assure that you will share in the Net Settlement Amount.
- 7. For questions about this Claim Form, or if you require assistance, please contact the settlement administrator, RicePoint Administration Inc., at **1-866-447-6214** or **snc@ricepoint.com**.
- 8. MAIL YOUR COMPLETED AND SIGNED CLAIM FORM POSTMARKED ON OR BEFORE **MAY 13, 2019** ADDRESSED TO THE ADMINISTRATOR:

### SNC-Lavalin Group Securities Litigation c/o RicePoint Administration Inc. P.O. Box 4454, Toronto Station A 25 The Esplanade Toronto, ON M5W 4B1

### **II. KEY DEFINITIONS**

- 1. "Action" means the action styled The Trustees of the *Drywall Acoustic Lathing and Insulation, Local 675 v. SNC-Lavalin Group Inc.,* filed in the Ontario Superior Court of Justice (Toronto, Ontario) and bearing Court File No. CV-12-453236-00CP and in the Québec Superior Court bearing Court File No. 500-06-000650-131.
- "Defendants" means SNC-Lavalin Group Inc., Ian A. Bourne, David Goldman, Patricia A. Hammick, Pierre H. Lessard, Edythe A. Marcoux, Lorna R. Marsden, Claude Mongeau, Gwyn Morgan, Michael D. Parker, Hugh D. Segal, Lawrence N. Stevenson, Gilles Laramee, Michael Novak, Pierre Duhaime, Riadh Ben Aissa, and Stephane Roy.
- 3. "Eligible Securities" means the SNC common shares acquired by a Class Member during the Class Period and still held at the close of trading on the Toronto Stock Exchange on February 27, 2012.
- 4. "Excluded Persons" means SNC's past and present subsidiaries, affiliates, officers, directors, legal representatives, heirs, predecessors, successors and assigns, and any spouse or child of the Individual Defendants, and any person who validly opted out of the Classes.
- 5. "Opt-Out Party" means any person who would otherwise be a Class Member and who submitted a valid Opt-Out Request by the Opt-Out Deadline (the Opt-Out Deadline was close of business on May 8, 2013).

### **III. CLAIMANT IDENTIFICATION**

- 1. If you acquired Eligible Securities and held the certificate(s) in your name, you are the beneficial purchaser as well as the record purchaser. If, however, the certificate(s) were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial purchaser and the third party is the record purchaser.
- 2. Use Part I of this form entitled "Claimant Identification" to identify each purchaser. In addition, if you are NOT the beneficial owner and are filing a claim on behalf of the beneficial owner, please complete the "filer name" field in Part I of the "Claimant Identification" section on the first page of the Claim Form. A CLAIM FORM MUST BE FILED BY THE ACTUAL BENEFICIAL PURCHASER OR PURCHASERS, OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASER OR PURCHASERS OF ELIGIBLE SECURITIES UPON WHICH THIS CLAIM IS BASED.
- 3. All joint purchasers must sign a Claim Form. Executors, administrators, guardians, conservators and trustees must complete and sign a Claim Form on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The Social Insurance number, Business number or other unique tax identifier and telephone number of the beneficial purchaser may be used in verifying the claim. Failure to provide the foregoing information could delay verification of a claim or result in its rejection from eligibility for compensation.

#### **IV. CLAIM FORM**

- 1. Claim Forms must be submitted to the Administrator (see contact details on the first page of these instructions).
- 2. A separate Claim Form must be filed for each account in which Eligible Securities were held.
- 3. A claimant must provide all of the requested information with respect to all of his, her or its:
  - (a) SNC shares held at the close of trading on November 5, 2009;
  - (b) Purchase(s) and acquisition(s) of SNC shares at any time during the Class Period;
  - (c) Total number of SNC shares sold between November 6, 2009 February 27, 2012;
  - (d) Total number of SNC shares held as of the close of trading on February 27, 2012; and
  - (e) SNC shares sold between February 28, 2012 through the date the Claim Form is filed, not exceeding the filing deadline of May 13, 2019.

Failure to report all required details may result in the rejection of a claimant's claim.

- 4. Please list each transaction in the Class Period separately and in chronological order, by trade date (not settlement date), beginning with the earliest. Claimants must accurately provide the month, day and year of each transaction listed.
- 5. Trade confirmations, broker statements or suitable alternative documentation evidencing a claimant's transactions in SNC shares must be submitted with the Claim Form. Failure to submit supporting documentation acceptable to the Administrator may result in the rejection of your claim.
- 6. The information required by the Administrator is the minimum amount of information necessary to process the claims. The Administrator may request additional information as required to efficiently and reliably calculate claimants' losses. In some cases, where the Administrator cannot perform compensation calculations accurately or at a reasonable cost to the Class with the information provided by a claimant, the Administrator may conditionally accept the claim pending receipt of additional information.
- 7. NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in an electronic aggregate file. If you wish to file an electronic file batch claim, you must contact the Administrator at institutions@ricepoint.com.

ast Name	Official Office Use Only PART I: CLAIMANT IDENTIF				SNC-Lavalin Group Inc. Securities Litigat Ontario Superior Court of Justice Toronto, Ontario Court File No. CV-12-453236-00CP Québec Superior Court Court File No. 500-06-000650-131 CLAIM FORM Please Type or Print in the Boxes Below Do NOT use Red Ink, Pencil, or Staples							gation Must Be Postmarked No Later Than May 13, 2019 <b>SDQ</b>											
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# PART II. SCHEDULE OF TRANSACTIONS IN SNC-LAVALIN GROUP INC.

## Traded in Canadian Dollars (CAD)

		: All persons and entities, wherever they may reside n and including November 6, 2009 to and including
Only SNC common shares acquired d	uring the Class Period are eligible	to potentially recover under the Settlement.
A separate Claim Form must be filed f	or each account in which Eligible	Securities were held.
<ul><li>A. Number of Shares held in this accou</li><li>B. Shares in Canadian Dollars purchas</li></ul>		
PURCHASES		Total Purchase Price
Trade Date(s) (List Chronologically)	Number of Shares Purchased	(Canadian \$)IncludingProof ofCommissionsPlease round off toPurchasethe nearest whole dollarEnclosed?
		C\$ 00 0Y
2. / /		C\$ 00 0Y
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C. Total number of shares sold betwee SALES	n November 6, 2009 - February 27	7, 2012:
Trade Date(s) (List Chronologically)	Number of Shares Sold	Total Sales Price (Canadian \$)Proof ofWithout Deducting Commissions Please round off to the nearest whole dollarSalesEnclosed?
3.		C\$ 00 N
D. Total number of shares held as of th	e close of trading on February 27,	2012: Proof Enclosed?
E. Shares in Canadian Dollars sold bet of May 13, 2019: SALES	ween February 28, 2012 through o	date Claim Form is filed, not exceeding the filing deadline
Trade Date(s) (List Chronologically)	Number of Shares Sold	Total Sales Price (Canadian \$)Proof ofWithout Deducting Commissions Please round off to the nearest whole dollarSales Enclosed?
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If you require additional space, attach extra schedules in the same format as above. Sign and print your name on each additional page. YOU MUST READ AND SIGN THE DECLARATION ON PAGE 6. FAILURE TO SIGN THE DECLARATION MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.



# PART II. SCHEDULE OF TRANSACTIONS IN SNC-LAVALIN GROUP INC.

## Traded in US Dollars (USD)

domiciled, who acquired SNC securiti trading on the Toronto Stock Exchang	es during the period from and in e on February 27, 2012 ("Class F	All persons and entities, wherever they may reside or be ncluding November 6, 2009 to and including the close of Period"). ble to potentially recover under the Settlement.							
A separate Claim Form must be filed f	•								
<ul> <li>A. Number of Shares held in this account</li> <li>B. Shares in US Dollars purchased or a PURCHASES — PURC</li></ul>	-								
Trade Date(s) (List Chronologically)	Number of Shares Purchased	Total Purchase Price (USD \$)Including CommissionsProof ofPlease round off toPurchasethe nearest whole dollarEnclosed?							
M     M     D     D     Y     Y       1.     /     /     /     /       2.     /     /     /		USD\$ 00 0Y USD\$ 00 0Y USD\$ 00 0Y							
3.									
C. Total number of shares sold betwee SALES	n November 6, 2009 - February 2 Number of Shares Sold	Total Sales Price <b>(USD \$)</b> Without Deducting Commissions <i>Please</i> <i>round off to the nearest whole dollar</i> Proof of Sales Enclosed?							
M     M     D     D     Y     Y       1.     /     /     /     /       2.     /     /     /       3.     /     /     /		USD\$ 00 Y USD\$ 00 Y USD\$ 00 Y N USD\$ 00 Y							
May 13, 2019:		Proof Enclosed?							
Trade Date(s) (List Chronologically)	Number of Shares Sold	Total Sales Price (USD \$)Proof ofWithout Deducting Commissions Please round off to the nearest whole dollarSales Enclosed?							
M       M       D       D       Y       Y         1.       /       /       /       /       /         2.       /       /       /       /       /         3.       /       /       /       /       /		USD\$ 00 Y USD\$ 00 Y USD\$ 00 Y N USD\$ 00 Y							

If you require additional space, attach extra schedules in the same format as above. Sign and print your name on each additional page. YOU MUST READ AND SIGN THE DECLARATION ON PAGE 6. FAILURE TO SIGN THE DECLARATION MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.



### PART III. Declaration

I (we) declare that the information on this Claim Form is true, correct and complete to the best of my knowledge, information and belief.

I (we) declare that I (we) have disclosed all of my (our) holdings and purchase and sales transactions in Shares for the time periods required by this Claim Form.

I (we) also declare that I (we) am (are) not an Excluded Person(s) or Opt-Out Party as these terms are defined in the General Instructions.

I (we) acknowledge and agree that the Claims Administrator may disclose all information relating to my (our) claim to the Courts and

counsel to the parties in the Actions, as may be necessary.

Executed this	day of		in		
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ACCURA	TE CLAIMS PROC	ESSING TAK	ES A SIGNIFIC	ANT AMOUNT OF TIME.	

THANK YOU FOR YOUR PATIENCE.

Reminder Checklist:

- 1. Please sign the above declaration.
- 2. Remember to attach supporting documentation, if available.
- 3. Do not send original share certificates; we may not be able to send them back.
- 4. Keep a copy of your Claim Form and all supporting documentation for your records.
- 5. The Claims Administrator will acknowledge receipt of your Claim Form by mail or email within 60 days. Your Claim Form is not deemed fully filed until you receive an acknowledgment postcard. If you do not receive an acknowledgment within 60 days, please call the Claims Administrator toll free at 1-866-447-6214.
- 6. If you move, you are required to send the Claims Administrator your new address. Failure to notify the Claims Administrator of a new address may result in your settlement benefits not being received by you.

# **Privacy Statement**

All information provided by the Claimant is collected, used, and retained by the Claims Administrator and Class Counsel pursuant to the Personal Information Protection and Electronic Documents Act (PIPEDA) for the purposes of administering the Settlements, including evaluating the Claimant's eligibility status under the Settlement Agreement. The information provided by the Claimant is strictly private and confidential and will not be disclosed without the express written consent of the Claimant and an order of the Court.

"Class Counsel" is defined as Siskinds LLP, Siskinds Desmeules Avocats, s.e.n.c.r.l. and Rochon Genova LLP. The "Claims Administrator" is defined as RicePoint Administration Inc. of London, Ontario.

