

CANADA

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL

SUPERIOR COURT
(Class Actions)

N°: 500-06-001321-245

JOYCE ROMANO

Representative Plaintiff

v.

DANONE INC.
and
WAL-MART CANADA CORP.
and
JORIKI INC.
and
INTACT COMPAGNIE D'ASSURANCE

Defendants

ADDENDUM TO THE SETTLEMENT AGREEMENT

WHEREAS the Settlement Agreement executed by the Parties was filed into the Court record on November 6, 2025 (the "**Settlement Agreement**");

WHEREAS the Parties believe it is appropriate to modify the Settlement Agreement in order to increase the Settlement Amount by \$1 million;

WHEREAS the modification to the Settlement Agreement provided for herein does not prejudice, in any way, the rights and obligations of the Class Members;

NOW THEREFORE, the Parties hereto respectively declare as follows:

1. The Settlement Agreement is amended by inserting the underlined text in section 1 (eee) as follows:

(eee) ***Settlement Amount or Settlement Fund*** means the fixed amount of CDN \$7,500,000 that the Defendants, except Wal-Mart, will pay pursuant to this Settlement Agreement, inclusive of all Compensatory Payments for Approved Claims, payments for the Provincial Health Insurer Claims, Administration Expenses, Class

Counsel Fees and Disbursements, plus any applicable taxes, interest and costs.


2. The Settlement Agreement is further amended by inserting the underlined text in section 3.2 under the heading "Settlement Amount", at clause 14, as follows:

14. The Defendants, except Wal-Mart, shall pay the full Settlement Amount of CDN \$7,500,000.

3. The remaining provisions of the Settlement Agreement continue to apply, with the necessary adjustments taking into account the present Addendum;
4. The additional payment of \$1 million by the Defendants to the Settlement Amount shall be payable within thirty (30) days from the discontinuance of the BC Proceeding (Court File No. VLC-S-S-244861);
5. Class Counsel will file an application asking the Court to approve this Addendum including the difference in Class Counsel Fees and Disbursements that result from the amendment to section 1 (eee) and the Defendants will take no position on this request, other than that they have agreed to pay these amounts, the whole pursuant to section 10 of the Settlement Agreement;
6. No other provisions of the Settlement Agreement are to be affected or otherwise modified by the present Addendum;

IN WITNESS WHEREOF, the Parties hereto have signed on the dates and at the places detailed below.

Plaintiff




Joyce Romano

Montreal, January 8, 2026

Place and Date

Class Counsel:
LPC Avocats



Joey Zukran

Montreal, January 8, 2026

Place and Date

Danone Inc.



Isabelle Rayle-Doiron

Boucherville, Quebec - 2026-01-08

Place and Date

Danone Inc. Counsel:
McCarthy Tétrault LLP



Emmanuelle Poupart

Montreal, QC - 2026-01-12

Place and Date

Wal-Mart Canada Corp.

Caroline Mostyn
Caroline Mostyn
Assistant General Counsel

Mississauga, Ontario January 9, 2026 | 09:01 CST
Place and Date

Wal-Mart Canada Corp. Counsel:
Fasken Martineau DuMoulin

Fasken Martineau DuMoulin S.E.N.C.R.L., s.r.l.
Noah Boudreau and Mirna Kaddis

Montréal, Québec January 9, 2026 10:37 EST
Place and Date

Intact Insurance Company



Marla Cox

Toronto, ON / January 9, 2026

Place and Date

Intact Insurance Company Counsel:

A.I.i.a. Services Juridiques



Christina Parent-Roberts

Montréal, Québec / January 12, 2026

Place and Date