
**NOTICE OF A SETTLEMENT IN TWO CLASS ACTION AGAINST IRONMAN
CANADA INC. AND WORLD TRIATHLON CORPORATION**

S.C.M. n° 500-06-001093-208 et n° 500-06-001119-219

Subject :

A proposed transaction (the “Transaction”) has been reached between Joanne PICARD (the “Plaintiff”), and IRONMAN CANADA INC. and WORLD TRIATHLON CORPORATION (“Ironman and WTC”).

This Transaction, subject to its approval by the Superior Court of Quebec (the “Court”), puts an end to the PICARD 1 Class Action concerning registration and participation in the 2020 Tremblant Events (as defined below) and to the PICARD 2 Class Action concerning registrations and payments made since July 25, 2017 by Quebec residents in order to participate in events organized by Ironman and WTC (referred collectively as the “Class Actions”).

The Court will hold a hearing shortly to determine whether it approves the proposed Transaction. This hearing will take place virtually on May 9, 2022 at 9:30 AM in room 16.08 of the Montreal courthouse, which is accessible using the following [Microsoft Teams link](#).

The Groups :

a. PICARD 1 Class Action

All persons who have registered and paid to participate in the 2020 IRONMAN® 5i50™ triathlon, the 2020 Sprint Mont-Tremblant triathlon, the 2020 IRONMAN 70.3® Mont-Tremblant triathlon, and the 2020 IRONMAN® Mont-Tremblant triathlon (referred collectively as the “2020 Tremblant Events”) which were cancelled due to the Covid-19 pandemic.

b. PICARD 2 Class Action

All persons who, since July 25, 2017, while residing in the Province of Quebec, have registered and paid to participate in one of the IRONMAN® or Rock 'n' Roll® Running Series events organized by Ironman and WTC in Quebec and which took place or were scheduled to take place after July 25, 2017.

Overview of the Class Actions :

The following allegations made by the Plaintiff were not proven in Court and are contested by Ironman and WTC, who maintain that they have complied at all times with all applicable legislation and did not commit any wrongdoing of any kind :

a. PICARD 1 Class Action

According to the Plaintiff, Ironman and WTC allegedly engaged in illegal conduct by neglecting to immediately refund in full the registration fees paid by the members of the PICARD 1 Class Action for the 2020 Tremblant Events that were cancelled due to the Covid-19 pandemic.

b. PICARD 2 Class Action

According to the Plaintiff, Ironman and WTC allegedly required from the members of the PICARD 2 Class Action a higher price than announced to register for the IRONMAN[®] or Rock 'n' Roll[®] Running Series events organized by Ironman and WTC in Quebec and which took place or were scheduled to take place after July 25, 2017.

What Does the Transaction Provide?

Without any admission of liability, for the purpose of avoiding a trial and the additional costs and expenses related thereto, Ironman and WTC agree to the following:

a. PICARD 1 Class Action

Ironman and WTC undertake to honor any refund request made by an eligible PICARD 1 Group Member who, for whatever reason, has not yet obtained a refund at the time of their request, subject to certain conditions.

b. PICARD 2 Class Action

Ironman and WTC implemented a change in business practice, on or around July 30, 2021, whereby new events organized by Ironman and WTC in Canada will now advertise an all-inclusive price, excluding taxes and optional costs or services. Ironman and WTC also undertake to grant each eligible PICARD 2 Group Member benefits in the form of one (1) credit (the "Credit(s)"), regardless of the number of registrations made or amount of processing fees incurred by each eligible PICARD 2 Group Member. Each Credit can be turned in for a single, one-time use only, non-transferable, non-refundable, and non-cash convertible credit-voucher with a value of CAD \$5.98, to be used to register to an event organized by Ironman or WTC.

Excluding Yourself from the Class Actions (Opting Out) :

If you wish to remain a member of the Class Actions, you have no steps to undergo. However, if you do not wish to be bound by the Class Actions (and the proposed Transaction) for any reason whatsoever, you will need to notify the court office of the Superior Court of Quebec a duly signed request for exclusion at 1, Notre-Dame Street East, Montreal, H2Y 1B6

before March 21, 2022, which includes the court docket number of the Class Action(s) from which you wish to opt out (S.C.M. no. 500-06-001093-208 for the PICARD 1 Class Action and/or S.C.M. no. 500-06-001119-219 for the PICARD 2 Class Action). If you choose to opt out of the Class Actions, you cannot receive any money or benefit from the proposed Transaction and you cannot object to it.

Objecting to the Transaction :

You have the right, as a Member of either the PICARD 1 or PICARD 2 groups (as defined above), to object to the terms of this Transaction in the manner provided for in the Detailed Notice and at the latest before May 3, 2022.

For more information :

This notice is only a summary of the Detailed Notice, which you can view by clicking here. For more information and to access the text of the Transaction, the schedules, the judgments and the various forms, please visit the following website : www.lambertavocatinc.com/class-action-ironman

You may also contact the Class Counsel identified below. Your name and any information provided will be kept confidential. Please do not contact the Judges of the Superior Court of Quebec.

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The publication and dissemination of this notice have been approved and ordered by the Court.

In case of discrepancies between this notice and the detailed notice, the latter shall prevail.