

**A SETTLEMENT HAS BEEN APPROVED
IN THE S-TRIP CLASS ACTION**

PLEASE READ THIS CAREFULLY as it describes how to claim your share of the settlement

For more information about this class action and the settlement, please visit the following website: www.s-tripsettlement.com. If you have questions, you may also contact the Claims Administrator at tripclassaction@ricepoint.com.

PURPOSE OF THIS NOTICE

On May 22, 2018, a class action lawsuit was commenced in the Ontario Superior Court of Justice by D’Andra Montaque (“Montaque” and/or the “Plaintiff”) against Handa Travel Student Trip Ltd. o/a I Love Travel, Campus Vacations Holdings Inc., 2504027 Ontario Inc. o/a S-Trip! and 2417988 Ontario Inc. o/a Breakaway Tours, Alexandre Jit Handa a.k.a. Alexandre Handa a.k.a. Alexander Handa a.k.a. Alex Handa, Justin Van Camp and Eugene Winer (“S-Trip” and/or the “Defendants”).

The lawsuit alleged, among other things, that S-Trip violated the *Employment Standards Act, 2000* (the “ESA”) and its contracts of employment with the Trip Leaders by misclassifying Trip Leaders as “volunteers” and failing to pay them wages, overtime, vacation pay and public holiday pay in accordance with the ESA.

The Action was certified as a class action on October 23, 2020.

Following a mediation in May 2021, Montaque and the Defendants reached an agreement to settle the Action (the “Settlement”). The Settlement has been approved by the Ontario Superior Court of Justice (the “Court”).

This Notice describes the Settlement in greater detail, including who it applies to, the details of the Settlement, and the process by which Class Members will be compensated.

WHO DOES THE SETTLEMENT APPLY TO?

All persons who worked as Trip Leaders for the Defendants on trips under their Breakaway Tours and/or S-Trip brands commencing in or departing from Ontario at any time during the period from June 3, 2014 to the date of certification, being October 23, 2020.

Members of the Class are bound by the terms of the Settlement unless they validly opted out by May 15, 2022.

MAKING A CLAIM

To receive a payment under the Settlement, you must complete an Administration Form and submit it to the Claims Administrator by December 29, 2022.

Class Members will be required to make a claim on the online claims portal on the class action settlement website: www.s-tripsettlement.com.

If your name is on the Class list provided by the Defendants, you will be considered a member of the Class. If your name is not on the Class list, you may be required to submit documents proving your membership in the Class. If the Claims Administrator determines you are not a Class Member, you may appeal to a referee, provided you pay a fee.

If you have a dispute regarding the Records used to calculate your entitlement as detailed on the Administration Form (“Dispute”), you must advise the Claims Administrator of the Dispute and provide documentation or reasons in support of an alternative calculation within the one hundred and twenty (120) days following distribution of the Notification Letters. Class Counsel shall review the information provided by any Class Member and, if necessary, seek input from the Defendants and Claims Administrator. Class Counsel shall then instruct the Claims Administrator on how compensation to the Class Member shall be calculated, and the Claims Administrator shall advise the Class Member of any new calculation or the reason for maintaining the original calculation within thirty (30) days of receiving the Dispute. If this Dispute is not resolved to your satisfaction, you may appeal the Claims Administrator’s determination to a referee, provided you pay a fee (“Dispute Appeal”).

You will receive payment by cheque. Class Members will need to ensure their updated address and contact information is provided to the Claims Administrator. The settlement payments are taxable and subject to employment-related deductions such as CPP/EI. Cheques not cashed within six months will be treated as stale, and any such amounts may be donated to charity in accordance with the terms of the Settlement.

WHAT IS THE EFFECT OF THE SETTLEMENT?

The Settlement entirely resolves the issues in this Class Action. The Settlement represents a compromise of the disputed issues in the litigation. The Settlement takes into account a variety of factors including the risks inherent in continuing the litigation and the time that would be required to finally resolve the matter, including appeals.

MORE INFORMATION AND CLASS COUNSEL

For more information, or if you have any questions, please contact Class Counsel at the address below:

Goldblatt Partners LLP
Attention: Tanya Atherfold-Desilva
20 Dundas Street West, Suite 1039
Toronto, Ontario M5G 2C2
Tel: 416-979-4233 / Fax: 416-591-7333
Email: tatherfold@goldblattpartners.com

THIS NOTICE WAS APPROVED BY THE ONTARIO SUPERIOR COURT OF JUSTICE