

**ASIA PACKAGING GROUP INC. (“APX”) CLASS ACTION
NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL**

This notice is to all persons who purchased or otherwise acquired APX Securities (TSX-V: APX), whether in a primary offering or in the secondary market, from and including April 26, 2011 to and including November 6, 2013, excluding Asia Packaging Group Inc., Manning Elliott LLP, their past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns, Robert Wilson, Brian Birmingham, Jin Kuang, Michael E.D. Raymont, George Dorin and any individual who is an immediate member of their family.

READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS.

COURT APPROVAL OF THE SETTLEMENT OF CLASS ACTION

In 2014, a class action was commenced against Asia Packaging Group Inc. (“APX”), Robert Wilson, Brian Birmingham, Jin Kuang, Michael E.D. Raymont, George Dorin, and Manning Elliott LLP (the “**Class Action**”). This notice applies to all persons who purchased or otherwise acquired APX Securities (TSX-V: APX), whether in a primary offering or in the secondary market, from and including April 26, 2011 to and including November 6, 2013.

The proposed representative plaintiffs and Manning Elliott LLP (the “**Settling Defendant**”) have reached a settlement, which has been approved by the Alberta Court of Queen’s Bench (the “**Court**”) (the “**Settlement Agreement**”). The Settlement Agreement provides that the Settling Defendant will pay \$350,000.00 plus accrued interest (the “**Settlement Amount**”) in full and final settlement of all claims of the Class Members against the Settling Defendant. The Settlement Amount includes all legal fees, disbursements, taxes and administration expenses. In return for the Settlement Amount, the Settling Defendant will receive releases and a dismissal of the Class Action as against them.

The settlement is a compromise of disputed claims and is not an admission of liability, wrongdoing or fault on the part of any of the Settling Defendants, which have disputed, and continue to dispute, the allegations advanced in the Class Action.

By Orders issued by the Court of Queen’s Bench of Alberta dated November 1, 2018, the Court certified the action as a class proceeding pursuant to section 5(1) of the *Class Proceedings Act*, SA 2003, c C-16.5 (“**CPA**”), and certified the class as a settlement class, as defined in section 4 of the *CPA*, as follows:

All persons and entities, wherever they may reside or be domiciled, who purchased or otherwise acquired APX Securities, whether in a primary offering or in the secondary market, from and including April 26, 2011 to and including November 6, 2013, excluding Opt-Out Parties, a named Defendant in Court of Queen’s Bench Action No. 1401-04522 (i.e., Asia Packaging Group Inc., Robert Wilson, Brian Birmingham, Jin Kuang, Michael E.D. Raymont, George Dorin, and Manning Elliott LLP), or an “Excluded Person” as defined in that action. (“**Class**” or “**Class Members**”).

The Court also approved the Settlement Agreement and declared that it is fair, reasonable and in the best interests of the Class Members. The Court also awarded Jensen Shawa Solomon Duguid Hawkes LLP (“**Class Counsel**”) legal fees in the total amount of \$84,624.64, plus disbursements actually incurred up to a maximum of \$1,501.45 plus applicable taxes (“**Class Counsel Fees**”). As is customary in such cases, Class Counsel conducted the class action on a contingent fee basis. Class Counsel was not paid as the matter proceeded and funded the expenses of conducting the litigation. This amount will be Class Counsel’s only compensation for conducting the class action. Class Counsel Fees will be deducted from the Settlement Amount before it is distributed to Class Members.

Expenses incurred or payable relating to approval, notification, implementation and administration of the Settlement (“**Administration Expenses**”) will also be paid from the Settlement Amount before it is distributed to Class Members.

CLAIMS ADMINISTRATOR

The Court has appointed RicePoint Administration Inc. as the Claims Administrator of the Settlement. The Claims Administrator will, among other things: (i) receive and process the Claim Forms; (ii) make determinations of each Class Member’s eligibility for compensation pursuant to the Distribution Plan; (iii) communicate with Class Members regarding their eligibility for compensation; and (iv) manage and distribute the Settlement Amount. The Claims Administrator can be contacted at:

Telephone: 1-866-432-5534
Mailing Address: Asia Packaging Group Class Action
c/o RicePoint Administration Inc.
P.O. Box 4454, Toronto Station A
25 The Esplanade
Toronto, ON M5W 4B1
Website: www.asiapackagingsettlement.ca

CLASS MEMBERS’ ENTITLEMENT TO COMPENSATION

Class Members will be eligible for compensation pursuant to the settlement if they timely submit a completed Claim Form, including any supporting documentation, to the Claims Administrator.

To be eligible for compensation under the settlement, Class Members must submit their Claim Form and required documentation postmarked no later than March 11, 2019 (the “**Claims Deadline**”). Claim Forms are available at www.asiapackagingsettlement.ca.

Only Class Members are permitted to participate in the settlement. In particular, the following persons are not permitted to participate in the settlement: (i) “Excluded Persons”, which are defined as the named Settling Defendant, their past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns, and any individual who is an immediate member of the family of an individual defendant; and (ii) persons who opt out of the Class Action.

The Net Settlement Amount, after deduction of Class Counsel Fees, and Administration Expenses (the “**Net Settlement Amount**”), will be distributed to Class Members in accordance with the Distribution Plan.

Each Authorized Class Member’s actual compensation from the Net Settlement Amount will be his/her/its *pro rata* share of the Net Settlement Amount calculated as set out in paragraphs 10-18 of Schedule “F” to the Settlement Agreement. Entitlements of less than \$5.00 will not be paid.

If a Class Member disputes the Claims Administrator’s decision, whether in whole or in part, the Class Member may appeal the decision by bringing an Application, on notice to the Plaintiffs, Class Counsel and the Claims Administrator, in the Court. The notice must be served within 15 days after the Claims Administrator renders its final decision. The Class Member must use his/her/its best efforts to ensure that the motion is scheduled and heard within 120 days after the notice has been served. A decision of the Court shall be binding and no further appeal shall lie therefrom.

If there is a positive balance after one hundred and eighty (180) days from the date of distribution of the Net Settlement Amount to Class Members, the Claims Administrator shall, if feasible, allocate such balance among Class Members in an equitable and economic fashion. Any balance below \$25,000.00 which still remains thereafter shall be donated to the Alberta Securities Commission to be used solely for the purpose of educating investors and promoting or otherwise enhancing knowledge and information of persons regarding the operation of the securities and financial markets.

OPTING OUT OF THE PROCEEDINGS

If you would like to exclude yourself from the Settlement Agreements, you can opt out by sending the Opt-Out Form, **which can be found at www.asiapackagingsettlement.ca**, to the Claims Administrator by regular mail by no later than 21 days following the dissemination of the Notice of Approval of Partial Settlement to Class Members in accordance with the Plan of Notice to:

Asia Packaging Group Inc. Class Action
P.O. Box 4454, Toronto Station A
25 The Esplanade
Toronto, ON M5W 4B1
Telephone: 1-866-432-5534

If you do not opt out of the Settlement Agreement in the manner required by this notice, you will be bound by the terms of the proposed Settlement Agreement and will be barred from instituting or continuing any legal action against the Settling Defendant in relation to the subject matter of the action.

COPIES OF THE SETTLEMENT DOCUMENTS

Copies of the Settlement Agreement and the Distribution Plan may be found on the website of Class Counsel at: www.jsbarristers.ca/pages/class-actions/class-actions.cfm or by contacting Class Counsel at the contact information provided below.

IMPORTANT DEADLINE

Claims Deadline: March 11, 2019

Claim Forms will not be accepted after the Claims Deadline. As a result, it is necessary that you act without delay.

CLASS COUNSEL

Jensen Shawa Solomon Duguid Hawkes LLP are counsel to the Plaintiffs in the class proceeding, and can be reached by telephone at 403-571-1520.

CLAIMS ADMINISTRATOR

RicePoint Administration Inc. has been appointed by the Court to be the Claims Administrator and is responsible for the distribution of the Net Settlement Amount. They can be reached by telephone at 1-866-432-5534 or email at asiapackaging@ricepoint.com.

INTERPRETATION

If there is a conflict between the provisions of this notice and the Settlement Agreement, the terms of the Settlement Agreement will prevail.

**DISTRIBUTION OF THIS NOTICE HAS BEEN AUTHORIZED
BY THE ALBERTA COURT OF QUEEN’S BENCH**