

NOTICE OF SETTLEMENT APPROVAL HEARING – LONG FORM

WAYLAND GROUP CORP., SCOTT LANGILLE, GERHARD MÜLLER, PAUL PATHAK, ERIC SILVER, MICHAEL STEIN, JOHN DOES 1-3, CANACCORD GENUITY CORP., AND RF SECURITIES CLEARING LP (FORMERLY KNOWN AS GMP SECURITIES L.P.)

SECURITIES CLASS ACTIONS

TO: All persons and entities, other than Excluded Persons¹, wherever they may reside or be domiciled, who purchased or otherwise acquired common shares, units and warrants of Wayland Group Corp. and Maricann Group Corp. on or after December 13, 2017 and held some or all of said securities as of the close of trading on August 2, 2019 (the “**Class**” or “**Class Members**”)

READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS. YOU MAY NEED TO TAKE PROMPT ACTION

PURPOSE OF THIS NOTICE

This Notice provides Class Members with information about the proposed settlement of three shareholder class actions that were commenced in the Ontario Superior Court of Justice (the “**Court**”): (i) *Marco Stajic, Mordecai Bobrowsky and Kyle Yamamura v. Wayland Group Corp. and Benjamin Ward*, Court File No. CV-21-00665194-00CP (the “**Wayland Action**”); (ii) *Marko Stajic v. Scott Langille, Gerhard Muller, Paul Pathak, Eric Silver, Michael Stein and John Does 1-3*, Court File No. CV-22-00687490-00CP (the “**Stajic Action**”); and (iii) *Michaël Bordeleau-Tassile v. Canaccord Genuity Corp., and GMP Securities L.P.*, Court File No. CV-23-00693650-00CP (the “**Bordeleau-Tassile Action**” and collectively with the Wayland Action and the Stajic Action, the “**Actions**”).

This Notice also provides Class Members with information about the Settlement Approval Hearing (as defined below) and how to opt-out of the Actions or object to the proposed settlement. Information about how to submit a Claim Form to the Administrator in order to participate in the distribution of the Settlement Amount (as defined below) will be provided to Class Members in a second notice following the Settlement Approval Hearing (as defined below).

BACKGROUND OF THE ACTIONS

The Actions raise similar allegations and are based on the same set of alleged facts and issues relating to Wayland’s business practices and public filings and statements. The Plaintiffs allege that the Defendants made misrepresentations or failed to disclose a material change or material fact concerning Wayland, its operations and/or financial status, including in connection with its production facility located in Langton, Ontario and/or its Chief Executive Officer, Benjamin Ward, during the period of December 13, 2017 to August 2, 2019. The Settling Defendants (as defined below) deny all such allegations. Copies of the Statements of Claims for each of the Actions, as well as other legal documents associated with the Actions, can be found at:

<https://bergermontague.com/cases/wayland-group-corp/>.

On February 4, 2026, in connection with the proposed settlement (described below), the Court ordered, among other things, that the Actions be heard together and certified as class proceedings, for settlement purposes only, and granted the Plaintiffs in the Wayland Action and Stajic Action leave to proceed under section 138.8(1) of the *Securities Act*, RSO 1990, c S.5, as amended (the “**OSA**”) or equivalent securities legislation, to commence the actions under section 138.3 of the OSA or equivalent securities legislation.

¹ “**Excluded Persons**” means each Settling Defendant, their respective family members, and any businesses in which they have a financial interest, and any investor who falls within the certified Class definition but who validly opts-out of the Actions.

WHO ACTS FOR THE CLASS?

Berger Montague (Canada) PC (“**Class Counsel**”) represents the proposed Class in all three Actions. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense. You will not have to directly pay any fees or expenses to Class Counsel. However, Class Counsel will seek to have their fees and expenses paid from any money obtained for the Class.

PROPOSED SETTLEMENT WITH SETTLING DEFENDANTS

The Plaintiffs in the Actions have entered into a proposed settlement with the Defendants in the Stajic Action, the Defendants in the Bordeleau-Tassile Action, and with the Defendant Wayland, through its Litigation Guardian, in the Wayland Action (together, the “**Settling Defendants**”). The proposed settlement does not include the defendant Benjamin Allan Ward (“**Ward**”). The Settlement Agreement, if approved and its conditions fulfilled, will settle, extinguish and bar all claims relating in any way to or arising out of the Actions (as against the Settling Defendants and proposed Releasees) or any allegation which could have been made in the Actions against the Settling Defendants.

The Settlement Agreement, if approved and its conditions fulfilled, provides that CAD \$8 million (the “**Settlement Amount**”) shall be paid by the Settling Defendants, or their insurers and reinsurers, into an interest bearing account for the benefit of the Class until such time that it is distributed in accordance with a Court-approved Plan of Allocation. The Settlement Amount shall be inclusive of all interest, fees, taxes and disbursements claimed by the Class, including all legal fees and disbursements paid to, incurred by and to be incurred by Class Counsel to complete the settlement. The proposed settlement shall be in full and final settlement of all claims against the Settling Defendants in the Actions. The proposed settlement with the Settling Defendants is subject to court approval, as discussed below. The Settlement Agreement may be viewed at <https://bergermontague.com/cases/wayland-group-corp/>.

If the proposed settlement is approved by the Court: (i) the Stajic Action and Bordeleau-Tassile Action will be dismissed entirely on a without costs and with prejudice basis; and (ii) the Wayland Action will be dismissed against Wayland on a without costs and with prejudice basis, and will continue as against the remaining defendant in the Wayland Action, Benjamin Ward.

SETTLEMENT APPROVAL HEARING

On March 9, 2026 beginning at 10:00am E.S.T., there will be a hearing (the “**Settlement Approval Hearing**”) before the Court at which Class Counsel will seek the Court’s approval of (i) the Settlement Agreement; (ii) the fees and expense reimbursement requests of Class Counsel; and (iii) a plan of allocation and distribution of the Settlement Amount (the “**Plan of Allocation**”). The Settlement Approval Hearing will be held at the courthouse located at 130 Queen Street West, Toronto, Ontario, or virtually.

At the Settlement Approval Hearing, the Court will determine whether the Settlement Amount and the Plan of Allocation are fair, reasonable and in the best interests of the Class. At that hearing, Class Counsel will also seek court approval of its request for fees and expense reimbursement. As is customary in class actions, Class Counsel has prosecuted these Actions on a contingent fee basis.

WHO IS INCLUDED IN THE ACTIONS

Class Members are automatically included in the Actions once certified, and you do not need to do anything at this time if you wish to participate in any of the Actions. You are welcome, however, to contact Class Counsel to ask questions without charge. You will not be required to pay any costs in the Actions.

OBJECTIONS AND OPT-OUTS

At the Settlement Approval Hearing, the Court will consider any objections to the proposed Settlement and opt-outs from the Class by Class Members if the objections and/or opt-outs are submitted in writing, by prepaid mail or email to Berger Montague (Canada) PC, 330 Bay Street, Suite 505, Toronto, Ontario, M5H 2S8, Email: info@bergermontague.ca, Attention: Wayland Class Actions.

A written Objection can be submitted in English or French and must include the following information:

- a) the objector's full name, current mailing address, telephone number and email address (as may be available);
- b) the number of shares purchased during, and held at the close of, the Class Period;
- c) a brief statement of the nature of and reasons for the objection; and
- d) whether the objector intends to appear at the hearing in person or by counsel, and, if by counsel, the name, address, telephone number and email address of counsel.

An Opt-Out can be submitted in English or French and must include the following information:

- a) the Class Member's full name;
- b) current mailing address;
- c) telephone number; and,
- d) email address (as may be available).

If you opt-out of the Class, you will not be eligible to participate in the distribution of the Net Settlement Amount.

OBJECTIONS MUST BE RECEIVED ON OR BEFORE February 23, 2025 AT 5:00PM E.S.T.
OPT-OUTS MUST BE RECEIVED ON OR BEFORE March 2, 2026 AT 5:00PM E.S.T.

Each Class Member who does not opt-out of the Actions will be bound by the terms of the Settlement Agreement and will not be allowed to pursue an independent action against the Settling Defendants. If you wish to pursue other claims against any of the Settling Defendants relating to the matters at issue in the Actions, you should immediately seek independent legal advice. If you do not exclude yourself from participating in the Actions, all of your claims relating to the subject matter of this litigation will be determined by the result obtained in the settlement.

QUESTIONS

Questions for the Class Members' lawyers may be directed to:

Berger Montague (Canada) PC
330 Bay Street, Suite 505
Toronto, ON M5H 2S8
Tel: 647.576.7840
Email: info@bergermontague.ca

INTERPRETATION

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

This notice has been approved by the Court. Questions about matters in this notice should be directed to Berger Montague (Canada) PC and NOT directed to the Court.