

NOTICE OF CERTIFICATION AS AGAINST BENJAMIN ALLAN WARD

WAYLAND GROUP CORP SECURITIES CLASS ACTION

Read this notice carefully as it may affect your rights

This Notice is directed to all persons, other than Excluded Persons, who acquired Wayland’s common shares, and other securities sold by Wayland to purchase common shares, during the Class Period and who held some or all of those common shares until after the release of at least one of the Public Corrective Disclosures

PURPOSE OF THIS NOTICE

A class action brought on behalf of a class of investors of Wayland Group Corp. (“**Wayland**”) has been certified as against the Defendant Benjamin Allan Ward (“**Ward**”). This Notice provides Class Members with information about the Action.

THIS ACTION

This Notice provides Class Members with information about the action: *Marco Stajic, Mordecai Bobrowsky and Kyle Yamamura v. Wayland Group Corp. and Benjamin Ward*, Court File No. CV-21-00665194-00CP (the “**Wayland Action**”), as against Benjamin Allan Ward.

THE RELATED ACTIONS

On March 9, 2026, the Ontario Superior Court of Justice approved a Settlement in three related securities class actions: (i) the Wayland Action (excluding Ward); (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**”), collectively, the “**Actions**”).

The Settlement does not include Ward. Berger Montague (Canada) PC (“**Class Counsel**”) represents the proposed Class in all three Actions.

Copies of the Settlement Agreement and Statements of Claims for each of the Actions, as well as other legal documents associated with the Actions, can be found at: www.bergermontague.com/cases/wayland-group-corp.

THE CERTIFICATION ORDER

On March 26, 2026, the Honourable Justice Morgan of the Ontario Superior Court of Justice certified the Wayland Action as a class proceeding against Benjamin Allan Ward and appointed Marko Stajic as the representative plaintiff.

The Class Action has been certified against Ward on behalf of the Class, defined as:

“All persons, other than Excluded Persons, who acquired Wayland’s common shares, and other securities sold by Wayland to purchase common shares, during the Class Period and who held some or all of those common shares until after the release of at least one of the Public Corrective Disclosures.”

In the above Class Definition:

“**Public Corrective Disclosures**” means the material facts released to the market on: April 23, 2019, May 6, 2019 and August 2, 2019.

“**Class Period**” means the period of December 13, 2017 to August 2, 2019.

“**Excluded Persons**” means:

- (i) Wayland's executives, and their family members and any entities that they owned a financial interest in which made investments in Wayland;
- (ii) Benjamin Ward, his family members and business associates, and any entity that he or family member owned which had a financial interest in Wayland;
- (iii) Yoel Altman, Jeffrey Ayott, Roger Daher, David Danzinger, Andre DeFrancesco, John Esteireiro, John Fitzgerald, Errol Gordon, Peter Kirby, Paul Leggett, Craig Bridgman and their business and family's investment companies;
- (iv) all the entities identified within Wayland's news release dated January 31, 2019;
- (v) any person that received Wayland's securities from the acquisitions of Colma Pharmaceutical SAS, Haxxon AG, Nanoleaf Technologies Inc., Proimaging AG, and Theros Pharma Ltd; and
- (vi) Alpha Blue Ocean, Inc., DEMECAN Holdings GmbH, European High Growth Opportunities Securitization Fund, Grandhill Capital Inc., INEG Holdings UG, Proimaging AG, and their related companies and investments.

WHAT CERTIFICATION MEANS

The Certification Order means that the claims may proceed to pre-trial discovery and may eventually advance to trial as a class action on behalf of all Class Members for damages arising out of alleged misrepresentations.

Certification is a procedural step that defines the form of the litigation and the common issues to be resolved, allowing the litigation to be pursued on behalf of the Class.

OPT-OUTS

Class Members are automatically included in a class action once certified, and you do not need to do anything at this time if you wish to participate in this Class Action. You are welcome, however, to contact Class Counsel to ask questions without charge.

Class Members who wish to pursue their own action or who do not want to be bound by the outcome of the Class Action **MUST OPT-OUT of the Class Action.**

All Class Members will be bound by all orders and judgments of the Court and any settlement reached unless they opt-out of the action. If you wish to pursue your own action or do not want to be bound by the outcome of the Class Action, you then must opt-out of this Class Action and act prior to the expiration of the limitation periods.

Class Members may opt-out from the Class by submitting an Opt-Out Form in writing, by prepaid mail or email to Berger Montague (Canada) PC, 330 Bay Street, Suite 505, Toronto, Ontario, M5H 2S8, Email: canadainfo@bergermontague.com Attention: Waylan Class Action.

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 Wayland Action against Ward.

OPT-OUTS MUST BE RECEIVED ON OR BEFORE MAY 25, 2026 AT 5:00PM E.S.T.

QUESTIONS

Questions for the Class Members' lawyers may be directed to Class Counsel:
330 Bay Street, Suite 505
Toronto, ON M5H 2S8
Tel: 647.576.7840

Email: canadainfo@bergermontague.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.

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.