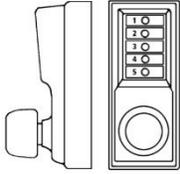


Notice of Settlement Approval



If you are a resident of Canada other than a resident of Québec and own or use a Simplex[®] or Unican[™] mechanical pushbutton lock, you may have a claim in a class action settlement.

This notice may affect your rights. Please read it carefully.

Detailed information and updates are available on the Settlement Website: www.simplexlockcase.ca

I. The Class Members:

All residents of Canada, other than residents of Québec, who use or own a Simplex[®] or Unican[™] **Model/Series 1000, L1000, 2000, 3000, 6200, 7000, 7100, 8000 or File Guard** mechanical pushbutton lock manufactured before January 1, 2011 (“End-Users”) or who purchased such a lock for re-sale (“Locksmiths”).

II. Purpose of this Notice:

A settlement has now been approved in a class action lawsuit filed in the Ontario Superior Court of Justice (“Court”) with respect to certain models of Simplex[®] or Unican[™] mechanical pushbutton locks (“Settlement”). The Plaintiffs claimed that the Simplex[®] or Unican[™] locks were improperly designed and marketed. The Defendants have denied all claims and continue to deny the Plaintiff’s allegations and maintain that the Defendants have not engaged in any wrongful acts. The Settlement is not an admission of wrongdoing or an indication that any law was violated. The Defendants have nevertheless concluded that it is in their best interests that this lawsuit be resolved subject to and on the terms and conditions set forth herein.

III. The Settlement Benefits:

A) Qualifying End-Users of Simplex[®] or Unican[™] mechanical pushbutton lock models listed above whose claims are approved are eligible to receive one or more of the following, depending upon a variety of different criteria: a free do-it-yourself (“DIY”) Upgrade Kit that addresses the design elements at issue in the lawsuit; free do-it-yourself (“DIY”) Shield that addresses the design elements at issue in the lawsuit, or a reduced cost or free professional installation of the Upgrade Kit.

B) Qualifying Locksmiths with inventory of unused, resalable Simplex[®] or Unican[™] mechanical pushbutton lock models listed above, which the Defendants did not already upgrade are eligible to exchange that inventory for new inventory that has been upgraded to address the design elements at issue in the lawsuit. Inventory of the listed models which has already been upgraded bears a yellow “Check Contents If Seal is Broken” tamper seal on the box flap.

IV. Your Options:

If you are a Class Member, you may (1) send in a Claim Form; or (2) exclude yourself from the settlement by opting out. The procedure for making a claim is set out below.

If you do not want to be bound by the settlement, you must opt-out. To do so, you must complete and submit an Opt-Out Form to Class Counsel by October 28, 2018. The Opt-Out Form and details of how to submit it can be found on the Settlement Website. Anyone who opts-out will not be bound by the Settlement Agreement, and will not be eligible to claim benefits under the Settlement Agreement, but may be eligible to pursue an individual claim. If you do not opt-out, you will not be able to commence your own lawsuit against the Defendants for any claims related to the Simplex[®] or Unican[™] Model/Series 1000, L1000, 2000, 3000, 6200, 7000, 7100, 8000 or File Guard mechanical pushbutton lock manufactured before January 1, 2011.

Please contact Class Counsel at the contact information below if you have any questions about the opt-out process.

V. The Claims Process:

To receive Settlement Benefits, qualifying Class Members must submit a Claim Form to the Claims Administrator through the Settlement Website, by email, or by mail by no later than January 4, 2019. The Claim Form is available on the Settlement Website at www.simplexlockcase.ca or you can obtain one by contacting the Claims Administrator at **1-888-693-6115**.

VI. The Court Decision:

The Court has granted a final Order certifying this action for settlement purposes and approving the Settlement as fair, reasonable and in the best interests of Class Members. The Court has also approved a request from Class Counsel for counsel fees, disbursements and taxes, as well as an honorarium payment to each of the Plaintiffs.

VII. Additional Information:

This Notice summarizes the Settlement and the Final Order. More details are in the Settlement Agreement. For more information on the lawsuit, the Settlement and the Final Order, please go to www.simplexlockcase.ca or contact the Claims Administrator at:

Claims Administrator
In Re: *Kaba Ilco National Settlement*
PO Box 4454
Toronto Station A
25 The Esplanade
Toronto, ON M5W 4B1
Tel: 1-888-693-6115
Email: info@simplexlockcase.ca

You may also contact Class Counsel at the contact information below if you have any questions.

VIII. Interpretation:

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

IX. Class Counsel:

Aris Gyamfi
KIM SPENCER McPHEE BARRISTERS P.C.
79 Wellington Street West
TD Tower South
Suite 2100
Toronto, ON M5K 1H1
Tel: (416) 349-6576
Fax: (416) 868-0601
Email: ag@complexlaw.ca
Web: www.complexlaw.ca

This Notice has been approved by the Ontario Superior Court of Justice.