

DISTRIBUTION OF SETTLEMENT AMOUNT TO SETTLEMENT CLASS MEMBERS

1. The following definitions apply in this Schedule:
 - (a) “Eligible Claim” means a Claim specified in Appendix 1 or a Previously Unknown Claim. The amount of a Class Member’s Eligible Claim in Appendix 1 shall be adjusted to account for any amount the Class Member received from Service Canada through the Wage Earner Protection Program.
 - (b) “Individual Contribution For Legal Expenses” means the Settlement Class Member’s *pro rata* share of all amounts in respect of legal fees, disbursements and applicable taxes to be paid to Koskie Minsky LLP (being the amount determined under paragraph 4(a)).
 - (c) “Individual Gross Allocation” means the *pro rata* share of each Settlement Class Member’s entitlement to the Settlement Amount for Eligible Claims after deducting the amount paid to the Trustee pursuant to section 31(a) of the Settlement Agreement.
 - (d) “Individual Net Payment” means the amount to be paid for an Eligible Claim to an individual Settlement Class Member. The Individual Net Payment is equal to the Individual Gross Allocation minus
 - (i) the Individual Contribution For Legal Expenses; and
 - (ii) the amounts remitted to the Canada Revenue Agency by TSGI in respect of that Settlement Class Member’s Eligible Claim pursuant to section 31 of the Settlement Agreement.
 - (e) “Net Settlement Amount” means the funds paid to Koskie Minsky LLP, in trust, pursuant to section 31 of the Settlement Agreement.
 - (f) “Pension Claim” means a Claim of a Settlement Class Member in respect of a reduction of benefits under the Pension Plan, calculated on a commuted value basis and based on the solvency deficit in the Pension Plan as of the wind up of the plan.
 - (g) “Pension Plan” means the Employees Retirement Plan of Stone & Webster Canada L.P., registration number 0515908.
 - (h) “Plaintiffs” means Ian Sansom, Robert Lukas, John McNab and Ed Dorr.
 - (i) “Previously Unknown Claim” means a Termination Claim, Pension Claim or such other Claim of a Settlement Class Member that is not listed in Appendix 1 and which is determined to be eligible for payment.

- (j) “Settlement Amount” means \$9,400,000.00.
- (k) “Settlement Agreement” means the settlement agreement between The Shaw Group Inc., Shaw Canada L.P., Stone & Webster Canada Holding One (N.S.), ULC., Stone & Webster Canada Holding Two, Inc. and the Plaintiffs entered into on September 10, 2013.
- (l) “Termination Claim” means a Claim by a Settlement Class Member in respect of termination of employment from Shaw Canada L.P.
- (m) “Total Claims” means the sum total of all Eligible Claims, as specified in Appendix 1 and all Previously Unknown Claims.

2. All other capitalized terms used in this schedule have the same meaning as in the Settlement Agreement and the Certification and Settlement Approval Order.

Goal

3. The goal of this distribution protocol is to divide the Net Settlement Amount among Settlement Class Members with Eligible Claims, net of contributions for legal costs and amounts to be remitted to the Canada Revenue Agency. The contribution for legal costs reflects a *pro rata* share of each Settlement Class Member’s legal costs.

Distribution of Net Settlement Amount

4. The Net Settlement Amount shall be paid in the following order of priority:
- (a) Payment to Koskie Minsky LLP, in respect of all legal fees, disbursements and applicable taxes that have been and will be incurred and unpaid in advance of final distribution of the Net Settlement Amount, subject to any maximum amount that is specified in the Certification and Settlement Approval Order.
 - (b) Payment to each Settlement Class Member with an Eligible Claim in an amount equal to the Individual Net Payment.

Previously Unknown Claims

5. Koskie Minsky LLP, in consultation with the Plaintiffs, shall determine the eligibility of a Claim to be a Previously Unknown Claim and shall, if it is eligible, determine the quantum of such a Claim pursuant to paragraph 8.

6. For any Settlement Class Member that contacts Koskie Minsky LLP within 30 days of the Certification and Settlement Approval Order and who asserts that he or she has a Previously Unknown Claim, Koskie Minsky LLP shall investigate the claim and make reasonable efforts to assist that Settlement Class Member to provide full particulars of his or her purported Claim.
7. A Claim of a Settlement Class Member will be eligible to be considered under paragraph 5 as a Previously Unknown Claim if:
 - (a) the Settlement Class Member provides full particulars of his or her purported Claim to Koskie Minsky LLP by no later than 30 days following the Certification and Settlement Approval Order;
 - (b) the Settlement Class Member has not signed a release of the Claim and is not otherwise barred by law, contract or court order from advancing the Claim;
 - (c) in the case of a Termination Claim, the Settlement Class Member was an employee of Shaw Canada L.P. who was terminated on or after September 10, 2011;
 - (d) in the case of a Pension Claim, the Settlement Class Member, whether an active member, a deferred member, a retiree or the spouse of an active member, a deferred member or a retiree, will incur a reduction in his or her pension benefits as of the wind up date; and
 - (e) in the case of a Claim that is not a Termination Claim or Pension Claim, Koskie Minsky LLP determines it is a meritorious claim against The Shaw Group Inc., Shaw Canada or their affiliates.
8. A Previous Unknown Termination and Pension Claim shall be quantified by Koskie Minsky LLP as follows:
 - (a) For a Termination Claim, the claim shall be the amount of the person's weekly pre-tax salary at the time of termination multiplied by a factor determined by Koskie Minsky LLP that is consistent with the factors applied to similarly situated terminated Settlement Class Member Claims, multiplied by the total number of years in full time employment at Shaw Canada L.P.
 - (b) For a Pension Claim, the claim shall be the amount that reflects the reduction, on an actuarial basis, of the reduction of the Settlement Class Member's pension benefit under the Pension Plan as a result of the Plan's solvency deficiency, calculated as of the wind up date.

- (c) For any other Claim, the claim shall be quantified taking into account any appropriate discounts for liability and recovery in Koskie Minsky LLP's sole discretion.
9. Koskie Minsky LLP shall notify the Settlement Class Member of the value of his or her Previously Unknown Claim as determined under paragraph 8.
10. The determinations of Koskie Minsky LLP with regard to the value of any claim under paragraph 8 and with regard to a determination under paragraph 5 and 7 are final, subject only to a review by way of motion to a judge of the Ontario Superior Court of Justice (Commercial List), within 20 days of Koskie Minsky LLP sending a notice to the Settlement Class Member of its determination. Such motion shall be in such form and manner as the judge hearing the motion shall direct.

Payment to Settlement Class Members

11. Koskie Minsky LLP shall arrange for the payments to Settlement Class Members and shall make such payments as soon as practicable after it receives payment of the Net Settlement Amount (from TSGI).
12. Payments to Settlement Class Members shall be made by bank transfer, cheque or such other method of payment as Koskie Minsky LLP deems appropriate, in consultation with the Plaintiffs.
13. If a payment is made by cheque and the Settlement Class Member does not cash the cheque within 3 months (a "Failed Payment"), Koskie Minsky LLP shall attempt to contact the Settlement Class Member using the contact information in its records in order to remedy the Failed Payment. Section 59.6 of the *Law Society Act*, R.S.O. 1990, c. L.8 applies in respect of Failed Payments, pursuant to which Koskie Minsky LLP may apply for permission to transfer any unclaimed amount to the Law Society of Upper Canada.
14. Any data error may be corrected by Koskie Minsky LLP and any other matter not referred to herein shall be determined by analogy by Koskie Minsky LLP in consultation with the Plaintiffs.

APPENDIX 1
Sansom et al. v. Shaw Canada L.P. et al, Claims of Known Class Members

First Name	Last Name	Damages, including for loss of employment, which are not otherwise described in another column	Damages under the Employees Retirement Plan of Stone & Webster Canada L.P, for underfunding on the wind-up of the plan	Damages for loss of employment to be transferred to a registered retirement savings plan of a Settlement Class Member	Total	RRSP account number	Payee for RRSP transfer
Peter	Adegeest		10,702.41				
Jennifer	Agard		1,016.61				
Emmelaine G.	Agustin	51,217.29					
Manjula	Aiyathurai		2,115.09				
Terry	Alladin	25,251.14					
Susan	Alksnis		1,504.65				
Romualdo	Alon	116,181.38					
I	Anderson		18,050.89				
Lambro	Athanasiu	194,062.90					
Joan	Atherley	114,096.95					
Doreen	Atkinson		13,385.45				
John	Aviste		1,047.51				
Robert	Baird		34,612.23				
Lia	Bakalenikova	39,535.63					
Prem	Balmakund	252,528.61					
Darrell	Barkel	185,025.38					
Joyce	Barron		6,527.07				
John	Bates	120,570.74					
Antonio	Berlinger		39,483.28				
Margaret	Bessey	78,635.15					
Bogumila	Bradel-Willson	200,371.72					
Kyle Adam	Buckle	12,904.84					
Patrick	Bunting	35,436.90					
Shahid	Butt	30,251.73					
Malcolm	Campbell		24,428.55				
Vilma	Castro	44,412.11					
Wilfredo	Catibog	85,692.56					
Edward	Chan	94,278.02					
Tot	Chau		883.66				
Aziz	Chehade		3,732.33				
Magdi	Chidiac	430,927.52					
Lloyd	Chin		24,032.38				
Gabriela	Chirita	28,910.22					
Justine	Chiu		2,646.11				
Maria	Chow	91,532.51					
Gerald Robin	Clayton	61,669.44					
William	Clayton	125,694.02					

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Georgina	Clinning		23,822.15				
Jeffrey	Colligan		114,178.72				
Domenic	Contino	24,620.00					
David	Cowley		8,327.98				
Stanley	Crawford		77,188.27				
Carlito	Cruz	15,182.90					
Irina	Cruz	60,777.83					
Chris	Czyzewski		10,110.79				
James	Dalrymple		55,151.78				
Carlos	Davila		2,830.36				
Tamara	Dayot	24,594.59					
Eusebio	de Chavez	116,993.44					
Julius	De Villa	42,016.33					
Archibald	Dick		34,631.06				
Andrew	Diosady	25,894.63					
Edward	Dorr		37,380.99				
Ted	Doyle		36,309.73				
Andris	Dzenis	337,748.80					
Samir	El-Assal	134,053.23					
Mohamed Sherif	Elkelish	533,903.11					
Alasdair	Farquhar		19,201.22				
Shokoh	Fatahi	37,874.67					
Reynold	Fernandes		7,902.83				
Russell	Flynn		4,699.55				
Jong-Eric	Foo	321,589.73					
Jill	Fowlow		2,550.40				
King Cheung	Fung		4,983.17				
Albert	Garred		57,201.17				
Richard D	Gaspari	155,026.31					
Richard	Gee		8,926.34				
Jason	Geurts	18,599.60					
Douglas	Gignac	61,549.96					
Richard L	Gonsalves		4,873.83				
Rose	Gordon		5,675.17				
Claire(estate of)	Gourley		3,155.12				
Pamela	Goyal	55,472.00					
Roger	Greathead	54,276.37					

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John	Gregson		32,252.53				
Binh	Nguyen	Ha	86,837.88				
Lizhi	He		30,715.64				
Ebrahim	Hojabr		35,709.05				
David	Houser		73,883.24				
Anhal	Hraich			3,726.09			
John	Hutchison			8,492.84			
Stanley	Ing		36,293.11				
Raghad	Issa		19,548.97				
Eric	James			3,581.83			
Syed	Jawaid		335,169.91				
Barbara	Jure-D'Sylva		174,919.57				
Ronak	Kapadia		15,862.55				
Andrew	Karol			6,306.70			
Alison	Katsumi		13,511.35				
Imtiyaz	Kazi		34,782.42				
Anum	Khalid	Khan	11,596.81				
Khalid	Khan		66,608.68				
Reeyadh	Khan		19,295.53				
John	Kipping			9,477.96			
Peniel	Kong			1,307.74			
Chris M.	Krishnamurthy		82,245.31				
Cheung Lok	Kung		255,000.48				
Kam-Wah	Kwok		189,324.53				
Jeanett P.	Ladrado		67,964.86				
Jose	Ladrado		20,164.32				
Michael	Larcombe			22,947.12			
Joseph	Lee			674.84			
Bela	Leonardo			2,225.34			
John	Lex			25,447.86			
Collin	Linley			9,024.02			
Marcel	Loewenberg			9,386.36			
Velerie	Longarini			2,401.51			
Glenn	Longert		41,868.59				
Robert	Lu			45,790.16			
Roger	Luck		344,564.15				
Nicholas	Luk		382,584.81				

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Robert	Lukas	615,391.28					
Roderick	Macdonald			55,555.90			
Ian	Macdougall			48,844.24			
Faisal	Mahamah	40,099.09					
Jashwinder	Mann	30,542.11					
Janet	Martinko			4,123.40			
Tony	Matassa	146,499.84					
J	McNab			1,808.59			
Richard John	McNab	209,651.70					
John	Millard			3,087.35			
Daniele	Minicucci	99,975.36					
Natalia	Mirotta	20,219.63					
Antoni	Mis	296,107.79		73,840.48			
Flavia	Missier			922.31			
Om Parkash	Mittal	270,063.31					
Denise	Nakatsu	21,116.62					
Seied-Esmaeil	Namaki	185,894.64					
Patrick	Nemeth			210.66			
Paul	Ng	39,735.79					
Wing	Ng			1,207.10			
Cathy	Niemiec			3,939.69			
Andres	Nunez	19,896.44					
Steven	Nunnari	12,847.71					
Pierre	Oneid			4,946.65			
Dario	Opacak	157,188.71					
Tom	O'Rafferty			20,772.63			
Jeannie	Pak			2,495.86			
Jeong Kyu	Park	41,639.42					
Suzana	Pavlovic	23,770.55					
Roger	Payne			18,016.52			
Derek	Peatfield			13,349.69			
Yvette	Pinto	73,296.08					
Maria	Pinzon	35,572.52					
Catharina	Pley			16,868.95			
Christopher	Potter	61,634.52					
Yves	Poulin	152,361.72					
David	Purvis	224,949.04					

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Janis Radvils	Palieps			379.41			
Amjid	Qureshi			15,500.11			
Rolan	Ramoran		7,206.14				
Swaroop	Rangam	181,418.35					
Khalid	Rehman	203,701.68					
Mckendrick	Reid			1,559.49			
Alexander	Reynolds			4,547.56			
Julian	Rhone	19,277.09					
Patrick	Richards			4,216.55			
Dave	Riddick			4,525.32			
Allan	Rusinek	42,250.41					
Jamshid	Rustami	27,270.62					
Raphael	Sack-Tine			1,892.30			
Temul	Sahadeo	20,384.25					
Pouneh	Salehi	11,757.79					
Lucian	Sampaleanu			7,437.25			
Ian	Sansom	248,338.66					
Jennifer	Santone	19,234.79					
Walter	Seaton			17,879.18			
Danuta	Segen	29,077.03					
Vishal	Shah	34,604.88					
Zareen	Shah	12,428.76					
Lirong	Shao	17,436.40					
Edward Lloyd(estate of)	Shemansky			19,232.34			
Ralph	Smialek			97,801.22			
Michael	Snape			20,612.79			
David	So			12,171.77			
Kam-Wing	So			1,781.94			
Luis	Sousa			14,620.99			
Anthony	Starkey			29,775.49			
Ilmas	Suteir			1,260.69			
Brigitte	Swenker			11,179.32			
Chatrapaul	Tajit	88,332.02					
Abbas	Talebi	19,773.94					
Rui Peng	Tan	23,636.62					
George C.	Teodosiu	189,528.18					
Ivan	Tjandra			870.55			

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Ali	Toorani	10,645.53					
Joseph	Toth	195,480.38					
Lam	Tran	195,421.51					
Minna Clara	Van Duk		17,398.33				
J	Varma		24,498.54				
Leslie Victor	Waller		8,581.36				
Paul	Wang	146,487.83					
Yi	Wang	21,888.41					
John David	Watson	22,906.79					
Steven	Watson		4,246.15				
Simone	Weber	10,616.80					
David	Webster		42,085.33				
Bruce	Welch		13,563.75				
Michael	Woodcock		3,075.90				
		11,355,370.75	1,556,388.37	0.00	0.00		0.00