

Employment and Pension Class Action Against The Shaw Group Inc. et al

To: Former employees of Shaw Canada L.P. (“Shaw Canada”), Stone & Webster Canada Holding One (N.S.), ULC (“SWC1”) or Stone & Webster Canada Holding Two, Inc. (“SWC2”)

And To: Beneficiaries of the Employees Retirement Plan of Stone & Webster Canada L.P. (the “Shaw Canada Pension Plan”)

And To: Recipients of any long-term disability program in respect of Shaw Canada

And To: Surviving spouses, heirs, guardians, administrators, executors, trustees, estate trustees, successors and assigns of each of the former employees, pension plan beneficiaries and recipients identified above

Please read this notice carefully as it may affect your legal rights.

On October 9, 2013, the Ontario Superior Court of Justice (Commercial List) approved a Settlement of this employment and pension class action. This notice provides information about the Settlement, the ability not to participate and how the settlement proceeds will be distributed.

Background

On August 31, 2012, Shaw Canada, SWC1 and SWC2 made assignments into bankruptcy and terminated the employment of all employees of Shaw Canada. In response, Ian Sansom, Ed Dorr, John McNab and Bob Lukas commenced an action for damages, including for wrongful dismissal and the underfunding of the Shaw Canada Pension Plan. The action was brought on behalf of former employees and retirees against The Shaw Group Inc. (Shaw Canada’s parent company), certain of its affiliates, directors and other defendants. The defendants deny any wrongdoing or liability.

On October 9, 2013, the Ontario Superior Court of Justice (Commercial List) certified this action as a class proceeding for settlement purposes.

Settlement and Opt Out

Under the Settlement, The Shaw Group Inc. will pay a total of \$9.2 million for the benefit of eligible class members, including for the legal expenses incurred on their behalf, in exchange for a release of all claims against the defendants. The Settlement applies to all of the individuals described at the top of this notice, unless a person opts out of the Settlement. You may opt out of the settlement by completing an opt out form and sending it to class counsel, Koskie Minsky LLP, at the address below by no later than November 8, 2013. If you opt out of the Settlement, you will receive no benefits from it and will not be bound by the Settlement.

If you remain in the Settlement, you may receive compensation if you have a meritorious claim relating to Shaw Canada based on a Settlement distribution protocol. You can review the distribution protocol on the website for this class action: www.kmlaw.ca/ShawClassAction.

How To Receive Compensation For Meritorious Claims

The Settlement proceeds, after deductions for legal expenses and required taxes, will be distributed to former Shaw Canada employees and pension plan members who have claims

against Shaw Canada for amounts owing to them as determined pursuant to the distribution protocol. It is anticipated that the vast majority of class members are already known to Koskie Minsky LLP and the value of each of such person's individual claim has been calculated. All such class members who have a claim have been notified by letter from Koskie Minsky LLP and advised of the value of their claims.

If you did not receive a letter and you believe you have a meritorious claim, the deadline to advise Koskie Minsky LLP of such a claim from the Settlement is November 8, 2013. Koskie Minsky LLP will assess your claim to determine if it is meritorious and eligible for compensation for the Settlement. Late claims will not be accepted.

More Information

To obtain additional information about the Settlement, opting out or how the Settlement will be distributed, please contact Koskie Minsky LLP at:

Koskie Minsky LLP
20 Queen St. W., Suite 900, Toronto, ON M5H 3R3
Attention: Andrew J. Hatnay
Tel: 416-595-2083
Email: ahatnay@kmlaw.ca

A copy of the Settlement agreement and other information about the settlement is available on the website for this action: www.kmlaw.ca/ShawClassAction.

PLEASE DO NOT CONTACT THE COURT ABOUT THIS CLASS ACTION.

Class Action Against The Shaw Group Inc. et al

OPT OUT FORM

Last Name

First Name

Current Address

City/Town

Province/State

Postal Code/Zip Code

Telephone

Email

I am opting out of this class action because (select only one):

- A:** I am not owed any amount from The Shaw Group Inc. or its affiliates and not interested in the class action or pursuing any claims against The Shaw Group Inc. or its affiliates
- B:** I intend to pursue at my own expense a lawsuit against The Shaw Group Inc. or its affiliates for legal claims I have
- C:** Other (please specify) _____

If you opted out under box (B) above and intend to pursue a lawsuit against The Shaw Group Inc. or its affiliates, please describe the claim you intend to advance (use additional sheets if necessary) and attach all supporting documentation to this form:

I understand that by opting out, I will not be entitled to any of the benefits of the settlement.

Print Name

Signature

To opt out, this form must be received at the following address by November 8, 2013.

Koskie Minsky LLP, Attn. Andrew J. Hatnay
900-20 Queen St. West, Box 52, Toronto, ON M5H 3R3
Tel: 416-595-2083, Email: ahatnay@kmlaw.ca