

CLASS ACTION – DELIVERY FEES AND PRICE DISPLAY – PIZZA SALVATORÉ

NOTICE OF AUTHORIZATION AND SETTLEMENT

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Notice of authorization of a class action for settlement purposes only and notice regarding the approval of a settlement

(Manguian v. Les Franchises Salvatoré G.A. Inc., 500-06-001340-245)

If you are a resident of Canada and placed an order for a meal delivery or a medium-sized delivered pizza via the Pizza Salvatoré mobile apps or the website at www.salvatore.com between November 8, 2021, and June 17, 2025, your rights may be affected by an authorized class action and proposed settlement.

You do not have to do anything or pay anything to participate in the class action and its settlement.

Plaintiff Paul Manguian has filed an Application for Leave to Institute a Class Action and to be Appointed Representative against Les Franchises Salvatoré G.A. Inc. (“**Franchises Salvatoré**”) regarding the disclosure and display of additional delivery charges billed when placing an order for delivered meals through the Pizza Salvatoré mobile application or the www.salvatore.com website, as well as the promotional pricing of certain pizzas (the “**Action**”).

Although Franchises Salvatoré denies any fault or liability, a transaction has been entered into with the Plaintiff for the benefit of all Class Members for the settlement of all claims relating to the Action (the “**Transaction**”), subject to the approval of the Superior Court of Quebec (the “**Court**”).

Authorization of the Action for Settlement Purposes Only

On December 9, 2025, the Court authorized the Action for settlement purposes only and granted the Plaintiff representative status for the benefit of the following Group:

- a) All persons in Canada who placed an order for delivered meals via the Pizza Salvatoré mobile applications or via the website www.salvatore.com between November 8, 2021, and June 17, 2025, and who paid a price that is higher (due to mandatory added fees) than the price initially advertised or indicated in order to complete their order; and/or
- b) All persons in Canada who placed an order for a delivered meal via the Pizza Salvatoré mobile applications or via the website www.salvatore.com between November 8, 2021, and June 17, 2025, for at least one medium-sized pizza.

For the purposes of approving the Transaction, the Court has authorized the following main questions raised by the Action:

- a) Did Franchises Salvatoré fail to disclose and properly display its prices for delivered meal orders placed via its website or mobile apps, considering the addition of extra delivery fees?
- b) Did Franchises Salvatoré commit a breach by presenting reference prices or allegedly advantageous discounts for medium-sized pizzas?

The Transaction

In order to conclude the Transaction, Franchises Salvatoré modified the Pizza Salvatoré mobile applications and the website www.salvatore.com to disclose the existence of additional delivery charges and indicate their amount at the beginning of the ordering process, and agreed to pay a total amount of \$1,729,950, which consists of the following:

- a) The amount of \$1,500,000 will be distributed individually through the granting of a credit worth \$2.30 per person, valid for a period of 24 months, which will be automatically applied to the accounts of the Settlement Class members.
- b) Franchises Salvatoré will also pay Class Counsel's fees, including disbursements, in the amount of \$200,000 plus applicable taxes. Class Members will not be required to pay anything in this regard.

The full text of the Settlement is available at <https://cabinetsp.ca/salvatore>.

Franchises Salvatoré's records indicate that you are covered by the Action and the Settlement. If you wish to benefit from the Settlement and receive the Credit, you do not need to do anything.

A hearing on the approval of the Settlement, the benefits to Settlement Class Members, and the approval of Class Counsel's fees will be held on April 24, 2026, before the Court, either in person in Courtroom 15.02 at 9:30 a.m. or by videoconference at the following coordinates:

LINK TO VIRTUAL ROOM

**By phone: +1 581-319-2194,,514094554 or (833) 450-1741,,514094554
Conference Number: 514 094 554#**

During the Settlement approval hearing, Class Counsel will also ask the Court to approve Class Counsel's Fees. Class Members will not have to pay anything in this regard, as these fees will be covered by Franchises Salvatoré as part of the Settlement.

Anyone may attend the hearing, but if you wish to address the Court or object to the Settlement, you are invited to submit a Notice of Objection to Class Counsel on or before **April 9, 2026**, at the contact information below. Any Notice of Objection will be forwarded to the Court for consideration. However, you cannot object to or comment on the Settlement if you choose to opt out of the Action.

How to opt out of the Action (and the Settlement)

If you wish to opt out of the Action (and not be covered by the Settlement), you must notify the clerk of the Superior Court of Quebec for the District of Montreal by sending an Opt-Out Form by mail or in person to 1 Notre-Dame Street East, Montreal, Quebec, H2Y 1B6 no later than **February 5, 2026**, at 4:30 p.m.

The Opt-Out Form must include the following information: (a) your full name, address, telephone number, and email address; (b) your personal signature or the signature of a person authorized by law to act on behalf of the Class Member; and (c) a clear statement of your intention to opt out of the Action and the Settlement.

By opting out, you are choosing:

- 1) not to take part in the Transaction and not to benefit from its advantages; and

2) not to participate in any way in the Action.

The deadline for opting out of the Action and the Transaction is **February 5, 2026**.

Class Members **who opt out** will not be bound by the Settlement and the releases it contains but will also not be entitled to receive those benefits if the Settlement is approved by the Court. Class Members who opt out will also not be entitled to participate in the continuation of the Action, if any.

There will be no additional opportunity to opt out of the Action or the Settlement, whether or not it is approved by the Court.

What happens next?

If the Settlement is approved by the Court, the Credit to which you are entitled will be automatically applied to the Settlement Class Members' Accounts without them having to claim it or provide any information to benefit from it, and will be allocated in full to the payment of the first transaction made by a Class Member using the Pizza Salvatoré mobile application or the website www.salvatore.com.

You will receive notification of the availability of the Credit, but no other notice will be sent to Class Members unless the Court refuses to approve the Settlement.

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Class Members **will not** be required to pay the legal costs of the Class Action if it is dismissed.

A Class Member may ask the Court to intervene in the Action at their own expense. The Court will allow intervention if it believes it is beneficial to the Class.

FOR MORE INFORMATION about the Action, the Settlement, how to opt out of the Settlement, or how to object to the Settlement, please refer to the full text of the Settlement available here <https://cabinetsp.ca/salvatore>.

The attorneys who have undertaken the Action are Services Juridiques SP Inc. and can be reached at the following address:

Mr. Sébastien Paquette
Services Juridiques SP Inc.
1440 Sainte-Catherine Street West, Suite 522
Montreal, Quebec H3G 1R8
Phone: 514-944-7344
Email: spaquettelaw@gmail.com

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The communication of this notice has been approved by the Superior Court of Quebec.