

ASIA PACKAGING GROUP INC. (“APX”) CLASS ACTION

NOTICE OF PROPOSED PARTIAL CERTIFICATION AND PROPOSED PARTIAL SETTLEMENT

This notice is to all persons who purchased or otherwise acquired APX Securities (TSX-V: APX), whether in a primary offering or in the secondary market, from and including April 26, 2011 to and including November 6, 2013, excluding Asia Packaging Group Inc., Manning Elliott LLP, their past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns, Robert Wilson, Brian Birmingham, Jin Kuang, Michael E.D. Raymont, George Dorin and any individual who is an immediate member of their family

READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS.

CLASS ACTION COMMENCED IN ALBERTA HAS BEEN PARTIALLY SETTLED

In 2014, a class action was commenced against Asia Packaging Group Inc. (“APX”), Robert Wilson, Brian Birmingham, Jin Kuang, Michael E.D. Raymont, George Dorin, and Manning Elliott LLP (the “Class Action”). This notice applies to all persons who purchased or otherwise acquired APX Securities (TSX-V: APX), whether in a primary offering or in the secondary market, from and including April 26, 2011 to and including November 6, 2013.

The proposed representative plaintiffs and APX, Robert Wilson, Brian Birmingham, Jin Kuang, Michael E.D. Raymont, George Dorin (the “Settling Defendants”) have reached a proposed settlement subject to obtaining the approval of the Alberta Court of Queen’s Bench (the “Court”) (the “Settlement Agreement”). The Settlement Agreement provides that the Settling Defendants will pay \$1,390,000.00 plus certain accrued interest (the “Settlement Amount”) in full and final settlement of all claims of the Class Members against the Settling Defendants. The Settlement Amount includes all legal fees, disbursements, taxes and administration expenses. In return for the Settlement Amount, the Settling Defendants will receive releases and a dismissal of the Class Action as against them.

The settlement is a compromise of disputed claims and is not an admission of liability, wrongdoing or fault on the part of any of the Settling Defendants, which have disputed, and continue to dispute, the allegations advanced in the Class Action.

The Class Action will continue against Manning Elliott LLP, who are not party to the Settlement Agreement.

A CERTIFICATION AND SETTLEMENT APPROVAL APPLICATION WILL BE HELD IN CALGARY, ALBERTA

Before the Settlement Agreement can be implemented, certain conditions concerning the Settlement must be fulfilled, the Class Action must be certified for the purposes of settlement, and the Settlement Agreement must be approved by the Court.

Class Members may, but are not required to, attend at the Approval Hearing which will be held on Tuesday, May 1, 2018, at 10:00 am at the Calgary Courts Centre, 601 5th St. SW, Calgary, Alberta.

Class Members who do not oppose the proposed Settlement do not need to appear at any hearing or take any other action at this time to indicate their desire to support the proposed Settlement.

THE SETTLEMENT CLASS

The proposed definition for the settlement class is as follows:

all persons and entities, wherever they may reside or be domiciled, who purchased or otherwise acquired APX Securities, whether in a primary offering or in the secondary market, from and including April 26, 2011 to and including November 6, 2013, other than the Excluded Persons. ("**Class**" or "**Class Members**").

Excluded Persons means:

the Defendants, their past and present subsidiaries, affiliates, officers, directors, senior employees, partners, legal representatives, heirs, predecessors, successors and assigns, and any individual who is an immediate member of the family of Robert Wilson, Brian Birmingham, Jin Kuang, Michael E.D. Raymont, or George Dorin.

CLASS COUNSEL FEES, CLAIMS ADMINISTRATOR AND ADMINISTRATIVE EXPENSES

In addition to seeking Certification of this Action and the Court's approval of the Settlement Agreement, Class Counsel (as identified below) will seek the approval of their legal fees, in an amount equal to 25% of the Settlement Amount, plus disbursements and applicable taxes ("**Class Counsel Fees**"). Class Counsel will also seek approval of a distribution plan (the "**Distribution Plan**").

PROPOSED DISTRIBUTION OF THE NET SETTLEMENT AMOUNT

The Settlement Amount, minus Class Counsel Fees and Administration Expenses ("**Net Settlement Amount**"), will be distributed to Class Members who are Authorized Claimants in accordance with the Distribution Plan attached as **Schedule "F"** to the Settlement Agreement, which, in general terms, provides that:

- (a) In order to be eligible to receive compensation pursuant to the Settlement Agreement, you must be a Class Member.

- (b) The Claims Administrator will determine whether a Class Member is entitled to receive compensation from the Net Settlement Amount pursuant to the Settlement Agreement and the Distribution Plan (“**Authorized Claimant**”).
- (c) Each Authorized Claimant’s actual compensation from the Net Settlement Amount will be his/her/its *pro rata* share of the Net Settlement Amount calculated in accordance with the Distribution Plan.

If the settlement is approved, all Class Members except those who have formally opted out of the Action will be bound by the terms of the Settlement Agreement. This means that they will not be able to bring or maintain any other claim or legal proceeding against Asia Packaging Group Inc., Robert Wilson, Brian Birmingham, Jin Kuang, Michael E.D. Raymont, George Dorin or any other person released by the Settlement Agreement in relation to the claims advanced in the Class Action.

If the settlement is approved, another notice to Class Members will be published which will provide instructions on how to make a claim to receive compensation from the settlement.

A copy of the Settlement Agreement including the Distribution Plan may be found at <http://www.jssbarristers.ca/pages/class-actions/class-actions.cfm>.

CLASS MEMBERS MAY OBJECT TO THE SETTLEMENT

If you wish to comment on, or make objection to, the certification of the action for the purposes of settlement, the Settlement Agreement or Class Counsel Fees, you must provide notice in writing of your intention to do so. All such notice must be submitted to Class Counsel (at the addresses listed below) no later than Monday, April 16, 2018. Class Counsel will forward all such submissions to the Court and to Counsel for the Defendants. You may attend at the settlement approval hearing whether or not you deliver an objection.

A written objection should include the following information:

- (a) The objector’s name, address, telephone number, fax number (where applicable) and email address;
- (b) A brief statement outlining the nature of, and reason for, the objection; and
- (c) A statement as to whether the objector intends to appear at the settlement approval hearing in person or by legal counsel, and, if by legal counsel, the name, address, telephone number, fax number and email address of such legal counsel.

INTERPRETATION

If there is a conflict between the provisions of this notice and the Settlement Agreement, the terms of the Settlement Agreement will prevail.

QUESTIONS ABOUT THE PROPOSED SETTLEMENT SHOULD BE DIRECTED TO CLASS COUNSEL

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THIS NOTICE, AND DISTRIBUTION OF IT, HAS BEEN AUTHORIZED BY THE COURT OF QUEEN'S
BENCH OF ALBERTA