Long Form Notice of Certification

Notice to Class

The Alberta Court of King's Bench has certified the following action as a class proceeding: *John Edmunds and Merlyn Steciw as representative plaintiffs and The Investment Exchange Mortgage Corporation v Royal Bank of Canada,* Court File Number 1401-13650.

What is the case about?

Between 2002 and 2012, Kenneth Charles Fowler used a Royal Bank of Canada account held in the name of The Investment Exchange Mortgage Company to process monetary transactions in a Ponzi-type scheme.

Mr. Fowler solicited subscriptions of at least $100,000 for the purchase of shares in The Investment Exchange Mortgage Company, and then used those funds for his personal benefit.

Fowler pleaded guilty to charges, including fraud in 2017.

Messrs. Edmunds and Steciw were among individuals who subscribed for shares in The Investment Mortgage Company between 2002 and 2012.

Are you a class member?

The class consists of all persons (including corporations, partnerships, trusts or estates) in Alberta, or elsewhere in Canada, who subscribed for shares in The Investment Mortgage Company between 2002 and 2012.

How do you participate in the class action?

All persons who are resident in Canada and who fall within the definition of the class are automatically included in the class. All class members will be bound by the Court's judgment on the common issues, whether favorable or not, unless they have opted out of the class.

If you reside in Canada and fall within the definition of the class but do not want to be a member of this class, you must opt out of the class by completing the Opt Out form and returning it to Class Counsel no later than **Wednesday, October 7, 2026**. The Opt-Out form is appended to this Notice.

Class members who opt out cannot recover any money in this action. If you are considering opting out of this proceeding, you are strongly encouraged to obtain legal advice (other than from class counsel) in that regard.

All class members who decide not to opt out are requested to contact class counsel as soon as possible to confirm receipt of this notice and to provide current contact information to allow class counsel to make regular reports.

If you believe you have any documents related to The Investment Exchange Mortgage Company and your investment in it, please contact Code Hunter LLP as soon as possible.

How will the case proceed?

The class action has two stages. The first stage is the resolution of the common issues. A list of the common issues is available from Code Hunter LLP and can be found on their website at www.codehunterllp.com/Notices/TIE-RBC.

If these common issues are resolved in favour of the class, at the second stage the Court will determine what further steps class members need to take to determine if they are entitled to recover any damages, and in what amount.

The Investment Exchange Mortgage Corporation is also a Plaintiff in this action and its claims against RBC will be tried at the same time as the common issues trial. Pursuant to a Court Order, if The Investment Exchange Mortgage Corporation is successful in its claims, the Court has already determined a process for distributing proceeds to class members.

Who are the lawyers for the class and how do I find out more?

The lawyers for the class are Code Hunter LLP. Class members who wish to know the status of the class action or to review background information on the case should monitor Code Hunter LLP's website: www.codehunterllp.com/Notices/TIE-RBC.

The representative plaintiffs will instruct class counsel during the common issues stage. Class counsel must act in the interests of all class members. If any class members wish to participate on their own behalf at the common issues stage of the proceeding, they must apply to the Alberta Court of King's Bench.

Legal Fees

You do not need to pay any legal fees out of your own pocket.

If the common issues stage of the case is successful, the fees payable to class counsel for the class will be paid out of any judgment, and will not be paid directly by class members.

Any fee paid to class counsel is subject to court approval. The representative plaintiffs have entered into a fee agreement with class counsel that provides for class counsel to be paid a portion of the claim proceeds.

Class counsel will also seek from the Court the reimbursement for expenses incurred during the common issues litigation.

If the class loses the case on the common issues, class members are not responsible for the fees of any of the lawyers involved in the case.

If you have any questions regarding this notice, please see:
www.codehunterllp.com/Notices/TIE-RBC or contact class counsel:

Code Hunter LLP
850, 440 - 2 Avenue SW
Calgary AB T2P 5E9
Attention: Ben Frenken

Opt-Out Form

To: **Code Hunter LLP**
850, 440 - 2 Avenue SW
Calgary AB T2P 5E9

Attention: Ben Frenken

Email: ben.frenken@codehunterllp.com
Fax: (403) 234-9800

I wish to opt out of the class proceeding *John Edmunds and Merlyn Steciw as representative plaintiffs and The Investment Exchange Mortgage Corporation v Royal Bank of Canada* (Alberta Court of King's Bench file no. 1401-13650).

_____
Signature

Date: _____

Name: _____
(please print)

Address: _____

_____

_____

Postal Code: _____

Telephone Number: _____

Email: _____

To opt out, this form must be completed and received at the above address by no later than **Wednesday, October 7, 2026.**