IN THE SUPREME COURT OF VICTORIA
COMMERCIAL COURT
GROUP PROCEEDINGS

S ECI 2021 03645

BETWEEN:

JAKE THOMAS and YUE XIAO — Plaintiffs

- and -

THE A2 MILK COMPANY LTD (ARBN 158 331 965) — Defendant

GENERAL FORM OF ORDER

JUDGE:	The Honourable Justice M Osborne
DATE MADE:	4 August 2026
ORIGINATING PROCESS:	Writ filed 5 October 2021 (by the Thomas plaintiff) and 23 November 2021 (by the Xiao plaintiff)
HOW OBTAINED:	By consent pursuant to r 59.07 of *the Supreme Court (General Civil Procedure) Rules 2025* (Vic) (**'Rules'**)
ATTENDANCE:	N/A
OTHER MATTERS:	A. The parties have agreed to settle this proceeding, subject to the Court's approval pursuant to s 33V of the *Supreme Court Act 1986* (Vic). B. By Orders made 21 June 2024, as varied by orders dated 16 April 2025, group members were required to register their claims by 4:00pm AEST on 3 October 2025 (**Class Deadline**) in order to be eligible to participate in any settlement achieved on or before the commencement of the trial. Those group members who registered their claims in accordance with those orders, or the orders dated 30 September 2025 and/or 1 April 2026, are referred to as "**Registered Group Members**". Those group members who did not register their claims in accordance with those orders and did not opt out of the Proceeding are referred to as "**Unregistered Group Members**". C. This Order is authenticated by the Judge of the Court pursuant to Rule 60.02(1)(b) of the Rules.

THE COURT ORDERS BY CONSENT THAT:

Settlement Approval Hearing

1. By **4:00pm on Thursday 6 August 2026**, the Plaintiffs are to file and serve their summons seeking Court approval of the proposed settlement pursuant to section 33V of the *Supreme Court Act 1986* (Vic) (**Act**) and any ancillary orders (**Settlement Approval Application**).

2. By **4:00pm on 27 October 2026**, the Plaintiffs are to file and serve any evidence in support of the Settlement Approval Application.

3. By **4:00pm on 4 November 2026**, the Defendant is to file and serve any evidence on which it intends to rely at the Settlement Approval Application.

4. By **4:00pm on 10 November 2026**, the Plaintiffs are to file and serve an outline of submissions in relation to the Settlement Approval Application.

5. By **4:00pm on 17 November 2026**, the Defendant is to file and serve an outline of submissions in relation to the Settlement Approval Application.

6. The Settlement Approval Application is listed for hearing before Justice Nichols at **10:30am on 24 November 2026,** on an estimate of half a day.

7. For the purposes of material filed pursuant to orders 2 and 4, or otherwise in relation to the Proposed Settlement:

    a. subject to further order, leave is granted to the Plaintiffs to redact any material over which they make a claim of confidentiality and which they contend ought not be disclosed to the Defendant, or to a member of the public; and

    b. where a confidentiality claim is made over any material, the Plaintiffs must provide the Court with an unredacted version of the material that identifies the redactions made with a yellow highlight or overlay, with a document that identifies each redaction and a brief statement of the basis for each redaction, and a draft order in respect of confidentiality.

Settlement Notice to Group Members

8. Pursuant to sections 33X(5) and 33Y of the Act, the form and content of the notices of proposed settlement to group members, as defined in paragraph 2 of the Second Amended Consolidated Statement of Claim dated 1 September 2025 (**Group Members**), set out in

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Schedule 1 (**Settlement Notice**) and Schedule 2 (**Abridged Settlement Notice**) to these orders are approved.

Distribution of Settlement Notice and Abridged Settlement Notice to Group Members

9. Pursuant to section 33Y(2) of the Act, the Settlement Notice and Abridged Settlement Notice are to be distributed to Group Members between **23 and 25 August 2026** in accordance with the following procedure:
    a. the Plaintiffs' solicitors shall cause the Abridged Settlement Notice to be sent to each Registered Group Member and any Unregistered Group Members that have provided contact details to the Plaintiffs' solicitors regarding the proceeding following the Class Deadline:
        i. by email to the last known email address held by the Plaintiffs' solicitors with respect to each of those Group Members; or
        ii. where no email address is held by the Plaintiffs' solicitors, by post to the last known mailing address held by the Plaintiffs' solicitors with respect to each Registered Group Member
    b. the Plaintiffs' solicitors shall cause a copy of the Settlement Notice, together with a copy of the following documents, to be displayed on the Plaintiffs' solicitors' websites, and to remain continuously so displayed up to and including the final determination of the Settlement Approval Application pursuant to section 33V of the Act:
        i. Second Amended Consolidated Statement of Claim dated 1 September 2025;
        ii. Second Amended Defence dated 10 October 2025;
        iii. orders made by the Honourable Justice Osborne in regard to opt out and registration, dated:
            1. 20 December 2023;
            2. 21 June 2024;
            3. 16 April 2025;
            4. 18 August 2025;
            5. 30 September 2025;
            6. 1 April 2026;
            7. these orders; and

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iv. the Plaintiffs' proposed Settlement Distribution Scheme, with confidential information redacted; and

c. the Registry of the Supreme Court of Victoria shall display the Settlement Notice on the Court's website.

10. The Settlement Notice and Abridged Settlement Notice may be amended by the Plaintiffs' solicitors before they are published or distributed in order to correct any typographical error, or any postal, website, or email address or telephone number or other non-substantive error.

11. If the Settlement Notice or Abridged Settlement Notice is amended by the Plaintiffs in accordance with the previous order, the Plaintiffs' solicitors shall provide a copy of the amended Settlement Notice or Abridged Settlement Notice to the Civil Registry of the Supreme Court of Victoria by **4:00pm on 21 August 2026**.

12. All costs of and in connection with the giving of Settlement Notice and Abridged Settlement Notice or of an incidental nature to the procedure set out in order 9 above, shall paid by the Plaintiffs.

Objections to the Proposed Settlement

13. Pursuant to s 33ZF of the Act, by **4:00pm (AEST) on 22 September 2026** (**Objection Deadline**), any Group Member who wishes to oppose any aspect of the proposed settlement of the proceeding shall:

    a. deliver to the Civil Registry a completed Notice of Objection in the form of Annexure A to the Settlement Notice (**Objection Notice**); or

    b. submit the required information through the Supreme Court of Victoria's "Online Objection" facility at: https://www.supremecourt.vic.gov.au/areas/group-proceedings/a2-milk/objection (**Online Objection**).

14. Each Group Member who wishes to object in accordance with order 13 above must complete the Objection Notice or the Online Objection by doing one of the following:

    a. by personally signing or personally affixing their electronic signature;

    b. in the case of a corporation who is a Group Member, by a director of the corporation personally signing or personally affixing their electronic signature;

    c. by the Group Member's solicitor personally authorised to act on behalf of the Group Member personally signing or personally affixing their electronic signature as that Group Member's solicitor;

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d. in the case of an executor of an estate which is a Group Member, by the executor personally signing or personally affixing their electronic signature; or
e. in the case of a person holding a power of attorney for a Group Member, by the attorney personally signing or personally affixing their electronic signature.

15. The parties' solicitors have leave to inspect the Court file after the objection deadline, and to:
    a. copy any Objection Notices filed by or on behalf of Group Members; and
    b. obtain information relating to any Online Objections submitted by or on behalf of Group Members.
16. In the event that any Objection Notice is received by the parties or the solicitors for a party prior to the Objection Deadline, the parties or the solicitors for a party shall within 5 business days provide the Objection Notice to the Court and the other parties and the Objection Notice shall be deemed to have been submitted to the Court on the date it was received by the parties or the solicitors for the parties.
17. Any Group Member who wishes to oppose the proposed settlement may attend or send a legal representative to attend, the Supreme Court of Victoria on **24 November 2026** when the Settlement Approval Application will be heard.

Unregistered Group Member Applications

18. Pursuant to s 33ZF of the Act, any Group Member who did not register their claim by the Class Deadline in accordance with the Court's orders of 21 June 2024, as varied by Orders made 16 April 2025, or is otherwise not registered pursuant to the orders dated 30 September 2025 or 1 April 2026, (**Unregistered Group Member**) and who now wishes to seek leave to participate in the proposed settlement:
    a. by **4:00pm (AEST) on 22 September 2026** must send an email to a2milkclassaction@shine.com.au identifying the basis on which the Unregistered Group Member considers the Court should grant them leave to participate and must attach evidence in support (in the form of an affidavit or statutory declaration) and any written submissions of no more than two (2) pages; and
    b. unless the Court otherwise orders, may attend, or send a legal representative to attend, in person or by remote audio-visual link, the Supreme Court of Victoria on **24 November 2026** when the Settlement Approval Application is to be heard.

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Associate of a Judge of the Court

19. By **4:00pm Tuesday 29 September 2026**, the Plaintiffs are to file by way of email to the Civil Registry (via email to groupproceedings@supcourt.vic.gov.au), and serve on the Defendant:
    a. copies of any Unregistered Group Member applications that Shine Lawyers receives pursuant to order 18 above; and
    b. a spreadsheet itemising the objections received pursuant to orders 13 to 14 above.
20. Liberty to apply.

DATE AUTHENTICATED: 4 August 2026

The Honourable Justice M Osborne

Schedule 1

SUPREME COURT OF VICTORIA

A2 MILK SHAREHOLDER CLASS ACTION

JAKE THOMAS & YUE XIAO
V
THE A2 MILK COMPANY LTD
(S ECI 2021 03645)

IMPORTANT COURT NOTICE

PLEASE READ CAREFULLY

This notice contains important information about the proposed settlement of a class action against The a2 Milk Company Ltd. You should read this notice carefully as it may affect your legal rights. Any questions you have concerning this notice should not be directed to the Supreme Court of Victoria. If there is anything in this notice that you do not understand, you should seek legal advice.

A. WHY HAVE I RECEIVED THIS NOTICE?

1. You have received this notice because you may be a group member in a class action against The a2 Milk Company Ltd (**a2MC**). The Supreme Court of Victoria (the **Court**) has ordered that this notice be published to inform you about the key terms of the proposed settlement of the class action, the parties' intention to seek Court approval of that settlement, and your rights in relation to that process.

B. WHAT IS THE A2MC CLASS ACTION?

2. There were two class actions brought against a2MC in respect of similar issues and claims in Australia:

   (a) On 5 October 2021, Slater & Gordon commenced a class action in the Supreme Court of Victoria in Australia; and

(b) On 23 November 2021, Shine Lawyers commenced a class action in the Supreme Court of Victoria in Australia.

3. On 14 June 2022, the Court made orders to consolidate the two proceedings brought by Slater & Gordon and Shine Lawyers (the **a2MC Class Action**). Slater & Gordon and Shine Lawyers now jointly represent the plaintiffs in the a2MC Class Action.

4. Separately, on 16 May 2022, Thorn Law commenced a representative action in the High Court of New Zealand, which is being conducted by Hamilton Locke. On 23 January 2023, the High Court of New Zealand ordered that the New Zealand representative proceeding be stayed pending the final settlement or judgment in the a2MC Class Action.

5. This notice relates only to the a2MC Class Action.

6. The a2MC Class Action alleges that between 19 August 2020 and 9 May 2021 inclusive, a2MC:

(a) breached its continuous disclosure obligations in failing to inform the ASX and/or NZSX of information relating to the sale or monitoring of infant formula products in China; and

(b) engaged in conduct which was misleading or deceptive, or likely to mislead or deceive, by making misrepresentations regarding the sale or monitoring of infant formula products in China.

7. The a2MC Class Action also alleges that group members suffered loss as a result of these alleged breaches.

8. On 7 April 2026, an in-principle settlement between the parties was announced. a2MC denies the allegations and has reached the in-principle settlement without admitting liability. The settlement is subject to Court approval.

C. AM I PART OF THIS CLASS ACTION?

9. You are a group member in the a2MC Class Action if:

(a) at any time during the period from 19 August 2020 to 9 May 2021 inclusive, you held an interest in fully paid ordinary shares in a2MC (including any such interest acquired on the ASX, NZSX or Chi-X Australia/Cboe) that was:

(b) an interest you acquired between 19 August 2020 and 9 May 2021 (**acquisition claimants**); or

(c) an interest you had already acquired before 19 August 2020, and which you retained until a date after 28 September 2020 (**retention claimants**); and

you are alleged to have suffered loss by reason of the conduct alleged against a2MC in this class action.

10. There are some limited exceptions that apply. You are not a group member if you:

(a) were a director, officer or close associate of a2MC, or a judge of the Supreme Court of Victoria or the High Court of Australia; or

(b) opted out of the a2MC Class Action by lodging an opt-out notice with Shine Lawyers, Slater & Gordon or the Supreme Court of Victoria on or before 3 October 2025.

11. **If you are not a group member, you may disregard this notice**.

12. Please note, as set out in Part D below, not all group members are eligible to participate in the proposed settlement.

D. THE PROPOSED SETTLEMENT

What is the proposed settlement?

13. The key terms of the proposed settlement are:

(a) a2MC agrees to pay AUD$62 million to settle the a2MC Class Action (inclusive of claims for interest and costs); and

(b) the plaintiffs will apply to the Court for approval of the amounts incurred for legal costs, settlement administration costs and plaintiff reimbursement payments (see Part E below), which will be deducted from the Settlement Sum.

14. The proposed settlement must be approved by the Court. The Court will hold a hearing on **24 November 2026** (**Settlement Approval Hearing**) to determine whether to approve the proposed settlement. This will involve the Court deciding whether to approve the deed entered into by the parties to settle the proceeding, and the proposed scheme by which payments are to be calculated and made to registered group members (**Settlement Distribution Scheme**).

15. a2MC will hold the agreed sum of AUD$62 million in an interest-bearing account until the proposed settlement is approved and the funds are made available to the administrator for distribution in accordance with the Settlement Distribution Scheme. Any interest accrued during this time will form part of the amount to be distributed by the administrator. The **Settlement Sum** is therefore AUD$62million plus all interest accrued before the proposed settlement is approved and a2MC makes the funds available to the administrator for distribution in accordance with the Settlement Distribution Scheme.

16. If the proposed settlement is approved, a2MC will pay the Settlement Sum into a settlement distribution fund in accordance with the Settlement Distribution Scheme. More information about the Settlement Distribution Scheme is set out in Part E below.

17. If approved, all group members will also be bound by the terms of the proposed settlement (including unregistered group members) and will not be permitted to take any other legal action against a2MC or its related parties for circumstances raised in, or arising out of, the a2MC Class Action.

18. If the proposed settlement is not approved, the a2MC Class Action will continue, and there would be no distribution of payments to group members unless and until the plaintiffs are successful in the proceeding, or a further settlement is reached and approved by the Court.

Are all group members eligible to participate in the proposed settlement?

19. Not all group members are eligible to participate in the proposed settlement.

20. The Court previously made orders that only those group members who registered their claim with Shine Lawyers or Slater & Gordon by 3 October 2025 (**registered group members**) are eligible to participate in a settlement reached before the first day of trial (2 June 2026), which includes this proposed settlement.

21. Further information about the options available to group members can be found at Part G below.

E. PROPOSED SETTLEMENT DISTRIBUTION SCHEME

22. At or following the Settlement Approval Hearing, the Court will decide whether to approve the Settlement Distribution Scheme, by considering whether the terms of the Settlement Distribution Scheme are fair and reasonable, having regard to the interests of the plaintiffs and Group Members.

23. The purpose of the Settlement Distribution Scheme is to:

    (a) set out the process for distributing the Settlement Sum, including as between registered group members; and

    (b) determine how registered group members' compensation is to be calculated by reference to a proposed loss assessment formula(s) (**Loss Assessment Formula**).

24. A copy of the Settlement Distribution Scheme (excluding the Loss Assessment Formula) is available at Shine Lawyers' website (https://www.shine.com.au/service/class-actions/a2-milk-class-action)and Slater & Gordon's website (https://www.slatergordon.com.au/class-actions/current-class-actions/a2-milk-shareholder-class-action). Parts of the Settlement Distribution Scheme are confidential, which are therefore redacted or not displayed. If you wish to obtain a copy of the confidential Loss Assessment Formula, you may do so by requesting a copy from Shine Lawyers, and by signing and returning a confidentiality undertaking to Shine Lawyers.

How much will registered group members receive under the proposed settlement?

25. At this stage, it is not possible to inform registered group members of the specific amount they may receive from the Settlement Sum. The final distribution will depend on several variables that are not yet known, including those set out below.

26. First, the total deductions from the Settlement Sum that the Court will approve are not yet known (such as legal costs, settlement administration costs and reimbursement payments to the plaintiffs).

27. Second, the Court has not yet approved a Settlement Distribution Scheme, which will set out a Loss Assessment Formula for determining the amount of compensation each registered acquisition claimant and eligible retention claimant may receive.

28. The amount of compensation a registered group member may receive under the Settlement Distribution Scheme will vary depending on several factors, including:

    (a) the total number of registered group members who are eligible to participate in the settlement;

    (b) whether they are an acquisition claimant and/or a retention claimant;

    (c) the total deductions from the Settlement Sum that are approved by the Court (see below at Part F);

(d) any interest earned on the Settlement Sum before it is distributed to registered group members;

(e) for an **acquisition claimant**, factors including (but not limited to):

(i) the number of a2MC shares purchased;

(ii) the date(s) of purchase, and whether, and if so the dates, any of those shares were sold;

(iii) the relative strength of registered group member's claims depending upon the period in which they acquired shares in a2MC;

(f) for a **retention claimant,** factors including (but not limited to):

(i) the number of a2MC shares purchased before 19 August 2020, and which were retained until a date after 28 September 2020;

(ii) whether, and if so the dates, any of those shares were sold;

(iii) how the retention claimant registered group member would have made certain hypothetical investment decisions in response to particular hypothetical counterfactual scenarios.

29. It is possible that some registered group members will not receive any monies from the Settlement Sum if they did not incur a compensable loss in relation to their a2MC shares.

F. DEDUCTIONS FROM THE SETTLEMENT SUM

30. Under the proposed settlement, the Court will be asked to approve certain deductions from the Settlement Sum, before the remainder of the Settlement Sum will be distributed to registered group members in accordance with the Settlement Distribution Scheme.

31. Group members **will not** be liable for any legal costs out of their own pocket.

Legal Costs

32. The amount that the plaintiffs' lawyers will be paid was set by the Court ahead of the settlement through a **Group Costs Order**. Under this order, the plaintiffs' lawyers will be paid **24%** (inclusive of GST) of the Settlement Sum to cover the legal costs and disbursements incurred in conducting the proceedings on behalf of the group members, as well as the legal risks they took in running the class action. The amount of the Group Costs Order will be shared equally by the plaintiffs' lawyers: Shine Lawyers and Slater & Gordon.

33. The Group Costs Order is subject to further review and approval of the Court as part of the settlement approval process.

Settlement administration costs

34. The Court will be asked to appoint Shine Lawyers as the Administrator of the Settlement Distribution Scheme. If the Court appoints Shine Lawyers as the Administrator, the Court will be asked to approve an amount be deducted from the Settlement Sum for the expected costs of administering the Settlement Distribution Scheme.

35. The settlement administration costs are estimated to be $1,145,564.05 (including GST). These costs are in addition to the Group Costs Order.

Plaintiffs' reimbursement

36. The Court will be asked to approve a payment of $25,000 to each of the plaintiffs (Jake Thomas and Yue Xiao), that is a total of $50,000, and that the amount be deducted from the Settlement Sum. These payments are to compensate the plaintiffs for their own costs and expenses reasonably incurred in the course of acting as representative plaintiffs, on their own behalf and on behalf of all group members.

G. WHAT ACTIONS CAN I TAKE?

Registered group members

37. If you are a registered group member and you wish to participate in the proposed settlement, you do not need to take any immediate steps in response to this notice.

38. If the proposed settlement is approved, the Administrator will contact you with further information about the settlement distribution process and any actions you may be required to take to receive a distribution under the Settlement Distribution Scheme.

Unregistered group members

39. An opt out and registration notice was sent to group members in August 2025. The opt out and registration notice explained that, to participate in any settlement that may be reached prior to the first day of trial (2 June 2026), group members were required to register by 4pm (AEST) on 3 October 2025. Further, it explained that if a group member

did not register by that time, they would not be entitled to share in any settlement that may be reached prior to the first day of trial.

40. If you are an unregistered group member and the proposed settlement is approved:

    (a) you will be bound by the settlement, which means that you will not be permitted to take any other legal action against a2MC or its related parties for circumstances raised in, or arising out of, the a2MC Class Action; and

    (b) you will not be entitled to participate in the settlement, and will therefore not be entitled to receive any distribution from the Settlement Sum.

41. If you are an unregistered group member and wish to seek permission from the Court to participate in the proposed settlement, you:

    (a) must by **4 pm (AEST) on 22 September 2026**, send an email to a2milkclassaction@shine.com.au which:

        (i) identifies the basis on which you consider the Court should grant you permission to participate in the proposed settlement; and

        (ii) attaches evidence in support (in the form of a statutory declaration or affidavit); and

        (iii) attaches any written submissions of no more than two (2) pages; and

    (b) may attend, or send a legal representative to attend, the Settlement Approval Hearing at the Supreme Court of Victoria on **24 November 2026**.

42. It will be a matter for the Court whether any group members who seek permission to participate in the settlement (if approved) may do so.

Objections

43. Any group member (whether registered or unregistered) may, if they wish to do so, object to any aspect of the proposed settlement.

44. If you wish to object to the proposed settlement, you **must** notify the Court in writing, by no later than **4 pm (AEST) on 22 September 2026**, by submitting a completed Notice of Objection (available at pages 16 to 18 or online):

(a) via the Supreme Court of Victoria Website at https://www.supremecourt.vic.gov.au/areas/group-proceedings/a2-milk/objection; or

(b) posting or emailing a copy it to the addresses found on the Notice of Objection at Annexure A to this notice.

45. Any group member who objects may also appear at the Settlement Approval Hearing at **10:30am (AEDT)** on **24 November 2026** at the Supreme Court of Victoria, in Melbourne.

46. Any objections received by the Court will be considered by the Court, along with all of the other evidence and submissions filed by the parties, in determining whether or not to approve the proposed settlement.

47. If you are a registered group member, objecting will not affect your eligibility to participate in the proposed settlement in the event it is approved. If you are an unregistered group member, objecting will also not affect your right to seek permission from the Court to participate in the proposed settlement.

48. If you have opted out of the a2MC Class Action, you are unable to object to the proposed settlement because you are no longer a group member.

H. WHERE CAN I GET FURTHER INFORMATION?

49. Further information regarding the proposed settlement, including the proposed Settlement Distribution Scheme, can be obtained at:

(a) Shine Lawyers' website at https://www.shine.com.au/service/class-actions/a2-milk-class-action;

(b) Slater & Gordon's website at https://www.slatergordon.com.au/class-actions/current-class-actions/a2-milk-shareholder-class-action; and

(c) Supreme Court of Victoria Website at https://www.supremecourt.vic.gov.au/areas/group-proceedings/a2-milk.

50. If you have any questions regarding the a2MC Class Action, you should contact Shine Lawyers by emailing a2milkclassaction@shine.com.au or seek independent legal advice without delay. Please do not contact the Court. The Court staff are not permitted to give legal advice.

Schedule 1

ANNEXURE A

SUPREME COURT OF VICTORIA

A2 MILK SHAREHOLDER CLASS ACTION

JAKE THOMAS & YUE XIAO
V
THE A2 MILK COMPANY LTD
(S ECI 2021 03645)

NOTICE OF OBJECTION TO PROPOSED SETTLEMENT

Only complete this notice if you do not want the Court to approve the proposed settlement of the a2MC Class Action.

If you have opted out of the a2MC Class Action, you are unable to object to the proposed settlement.

If you want your objection to be considered by the Court, you must complete this form online via the Supreme Court of Victoria website at https://www.supremecourt.vic.gov.au/areas/group-proceedings/a2-milk/objection OR ensure a completed copy of the Notice of Objection reaches the Court by post or email to the addresses below, by **4 pm (AEST) on 22 September 2026**.

Postal Address: Civil Registry
Supreme Court of Victoria
210 William Street
Melbourne VIC 3000

Email Address: a2milkclassaction@supcourt.vic.gov.au

DETAILS OF OBJECTOR

Contact Name	
Capacity of person completing Notice of Objection *(select one)*	□ Group Member
	□ Director of [company name] ……
	□ Executor or Administrator for the estate of [name] ……
	□ Power of attorney for [name] ……
	□ Solicitor acting for [name] ……

Schedule 1

Phone Number	
Email Address	
Postal Address	
HIN/SRN (Australian shareholder only, if known)	
Total number of a2MC shares held as at 18 August 2020	
Total number of a2MC securities <u>purchased</u> during 19 August 2020 to 9 May 2021:	
Total number of a2MC securities <u>sold</u> during 19 August 2020 to 9 May 2021	
Are you a Registered Group Member? ***(select one)***	□ Yes
	□ No
	□ Unsure

REASONS FOR OBJECTING

Please explain in the box below why you are objecting to the proposed settlement. *Please note if you are completing this form online there is a character limit.*

Schedule 1

SUBMISSIONS AND EVIDENCE

I attach submissions and/or evidence in support of my objection *(select one)*	□ Yes
	□ No

APPEARANCE AT THE SETTLEMENT APPROVAL HEARING

Please indicate below whether, and if so how, you will appear at the Settlement Approval Hearing on **24 November 2025** to present your reasons for objection to the Judge.

Are you appearing at the Settlement Approval Hearing to present my objection/s to the Court? *(select one)*	□ No
	□ Yes, attending in-person
	□ Yes, attending via remote link
If you are appearing, will you have representation? *(select one)*	□ No, I will appear on my behalf
	□ Yes, I will be represented by a lawyer [name] ……

Signature:

……

Date:

……

Schedule 2

SUPREME COURT OF VICTORIA

A2 MILK SHAREHOLDER CLASS ACTION

JAKE THOMAS & YUE XIAO
V
THE A2 MILK COMPANY LTD
(S ECI 2021 03645)

IMPORTANT COURT NOTICE

PLEASE READ CAREFULLY

The Supreme Court of Victoria (the Court) has ordered that this notice be distributed to inform you about the key terms of the proposed settlement of the class action, the parties' intention to seek Court approval of that settlement, and your rights in relation to that process.

There is a more detailed Notice of Proposed Settlement which contains further information, which can be accessed on:

- **Shine Lawyers' website: https://www.shine.com.au/service/class-actions/a2-milk-class-action**
- **Slater and Gordon's website: https://www.slatergordon.com.au/class-actions/current-class-actions/a2-milk-shareholder-class-action**
- **The Supreme Court of Victoria's website: https://www.supremecourt.vic.gov.au/areas/group-proceedings/a2-milk**

Any questions about this notice should not be directed to the Supreme Court of Victoria. If there is anything in this notice that you do not understand, you should seek legal advice.

A. WHAT IS THE A2MC CLASS ACTION?

1. The class action against The a2 Milk Company Ltd **(a2MC Class Action**) alleges that between 19 August 2020 and 9 May 2021 inclusive, the defendant (**a2MC**):

   (a) breached its continuous disclosure obligations in failing to inform the ASX and/or NZSX of information relating to the sale or monitoring of infant formula products in China; and

(b) engaged in conduct which was misleading or deceptive, or likely to mislead or deceive, by making misrepresentations regarding the sale or monitoring of infant formula products in China.

2. The a2MC Class Action also alleges that group members suffered loss as a result of these alleged breaches.

3. On 7 April 2026, an in-principle settlement between the parties was announced. a2MC denies the allegations and has reached the in-principle settlement without admitting liability. The settlement is subject to Court approval.

B. WHAT IS THE PROPOSED SETTLEMENT?

4. The key terms of the proposed settlement are:

(a) a2MC agrees to pay the sum of AUD$62 million to settle the a2MC Class Action (inclusive of claims for interest and costs); and

(b) the plaintiffs will apply to the Court for approval of the amounts incurred for legal costs, settlement administration costs and plaintiff reimbursement payments (see paragraph 8 below), which will be deducted from the Settlement Sum.

5. The proposed settlement must be approved by the Court. The Court will hold a hearing on **24 November 2026** (**Settlement Approval Hearing**) to determine whether to approve the proposed settlement.

6. a2MC will hold the agreed sum of AUD$62 million in an interest-bearing account until the proposed settlement is approved and the funds are made available to the administrator for distribution in accordance with the Settlement Distribution Scheme. Any interest accrued during this time will form part of the amount to be distributed by the administrator. The **Settlement Sum** is therefore AUD$62million plus all interest accrued before the proposed settlement is approved and a2MC makes the funds available to the administrator for distribution in accordance with the Settlement Distribution Scheme.

7. Under the proposed settlement, the Court will be asked to approve certain deductions from the Settlement Sum, before the remainder of the Settlement Sum will be distributed to registered group members in accordance with the Settlement Distribution Scheme.

8. The proposed deductions are:

(a) 24% of the Settlement Sum for the legal costs and disbursements incurred in conducting the proceedings, pursuant to the Group Costs Order made by the Court on 20 December 2023;

(b) an amount for the expected costs of administering the Settlement Distribution Scheme (estimated to be $1,145,564.05 (including GST)); and

(c) a payment of $25,000 to each of the two lead plaintiffs (a total of $50,000) to compensate them for acting as representatives for themselves and all group members.

9. The Settlement Distribution Scheme is available on Shine Lawyers' website at https://www.shine.com.au/service/class-actions/a2-milk-class-action. Parts of the Settlement Distribution Scheme are confidential, which are therefore redacted or not displayed.

10. Group members **will not** be liable for any legal costs out of their own pocket.

11. If the proposed settlement is approved, a2MC will pay the Settlement Sum into a settlement distribution fund in accordance with the Settlement Distribution Scheme.

12. If approved, all group members will also be bound by the terms of the proposed settlement (including unregistered group members) and will not be permitted to take any other legal action against a2MC or its related parties for circumstances raised in, or arising out of, the a2MC Class Action.

C. AM I ELIGIBLE TO PARTICIPATE IN THE PROPOSED SETTLEMENT?

13. You may be eligible to participate in the proposed settlement in the a2MC Class Action if you are a **Registered Group Member**. You are a Registered Group Member if:

    (a) at any time during the Relevant Period, you held an interest in fully paid ordinary shares in a2MC (including any such interest acquired on the ASX, NZSX or Chi-X Australia/Cboe) that was:

        (i) an interest you acquired between 19 August 2020 and 9 May 2021 inclusive (**acquisition claimants**); or

        (ii) an interest you had already acquired before 19 August 2020, and which you retained until a date after 28 September 2020 (**retention claimants**); **and**

    (b) **registered your claim with Shine Lawyers and/or Slater and Gordon by 4pm (AEST) on 3 October 2025**.

14. An opt out and registration notice was sent to group members in August 2025. The opt out and registration notice explained that, to participate in any settlement that may be reached prior to the first day of trial (2 June 2026), group members were required to register by 4pm (AEST) on 3 October 2025.

D. WHAT ACTIONS CAN I TAKE?

Option 1: Do nothing

15. If you are a Registered Group Member and you wish to participate in the proposed settlement, you do not need to take any immediate steps in response to this notice. If the proposed settlement is approved, you will be contacted with further information about the settlement distribution process and any actions you may be required to take to receive a distribution under the Settlement Distribution Scheme.

Option 2: Seek permission to participate in the proposed settlement

16. If you are an **unregistered group member**, and wish to seek permission from the Court to participate in the proposed settlement, you:

    (a) must by **4 pm (AEST) on 22 September 2026**, send an email to a2milkclassaction@shine.com.au which:

        (i) identifies the basis on which you consider the Court should grant you permission to participate in the proposed settlement; and

        (ii) attaches evidence in support (in the form of a statutory declaration or affidavit); and

(iii) attaches any written submissions of no more than two (2) pages; and

(b) may attend, or send a legal representative to attend, the Settlement Approval Hearing at the Supreme Court of Victoria on **24 November 2026**.

17. It will be a matter for the Court whether any group members who seek permission to participate in the settlement (if approved) may do so.

Option 3: Object to the proposed settlement

18. Any group member (whether registered or unregistered) may, if they wish to do so, object to any aspect of the proposed settlement.

19. If you wish to object to the proposed settlement, you **must** notify the Court by no later than **4 pm (AEST) on 22 September 2026,** by submitting a completed Notice of Objection. The Notice of Objection is available via the Supreme Court of Victoria's website at https://www.supremecourt.vic.gov.au/areas/group-proceedings/a2-milk/objection and as Annexure A of the more detailed version of the Notice of Proposed Settlement.

20. Any group member who objects may also appear at the Settlement Approval Hearing at **10:30am (AEDT)** on **24 November 2026** at the Supreme Court of Victoria, in Melbourne.

E. WHERE CAN I GET FURTHER INFORMATION?

21. Further information regarding the proposed settlement, including the more detailed version of the Notice of Proposed Settlement and the proposed Settlement Distribution Scheme, can be obtained at:

(a) Shine Lawyers' website at https://www.shine.com.au/service/class-actions/a2-milk-class-action;

(b) Slater & Gordon's website at https://www.slatergordon.com.au/class-actions/current-class-actions/a2-milk-shareholder-class-action; and

(c) Supreme Court of Victoria Website at https://www.supremecourt.vic.gov.au/areas/group-proceedings/a2-milk.

22. If you have any questions regarding the a2MC Class Action, you should contact Shine Lawyers by emailing a2milkclassaction@shine.com.au or seek independent legal advice without delay. Please do not contact the Court. The Court staff are not permitted to give legal advice.