

HYDROGEN PEROXIDE CLASS ACTION SETTLEMENT SUBSEQUENT CLAIM FORM

You must complete all pages of this Subsequent Claim Form. Attach additional pages if space is insufficient. Please type or print legibly in black ink.

Section 1. Instructions for Subsequent Claim Form

1. This Subsequent Claim Form should only be completed by Canadian Settlement Class Members who filed a claim in the related U.S. litigation (the "U.S. Litigation") and had all or part of their U.S. claim rejected on the basis that the relevant Hydrogen Peroxide was not purchased in the U.S. or from a facility in the U.S. ("Eligible Hydrogen Peroxide Purchases"). No other Hydrogen Peroxide purchases should be included in this Subsequent Claim Form. Other Hydrogen Peroxide purchases should have been included in your original Canadian Claim Form, which had to be mailed to the Claims Administrator postmarked no later than September 8, 2009.

2. This Subsequent Claim Form relates to settlements reached with: Solvay Chemicals Inc. and Solvay S.A.; Evonik Degussa Corporation formerly Degussa Corporation, Evonik Degussa formerly Degussa A.G. and Evonik Degussa Canada Inc. formerly Degussa Canada Inc.; Eka Chemicals, Inc., Eka Chemicals Canada Inc., with AkzoNobel Chemicals International B.V.; and Kemira OYJ and Kemira Chemicals Canada Inc. However, Settlement Class Members can claim for their Hydrogen Peroxide purchases from all Defendants.

More information about the settlements and the distribution of the settlements can be found at www.hydrogenperoxideclassaction.ca.

3. The Canadian Settlement Class includes all persons in Canada who purchased Hydrogen Peroxide or Hydrogen Peroxide Products between September 14, 1994 and January 5, 2005 (the "Class Period"), except the Defendants and certain entities or persons related to the Defendants.

4. "Hydrogen Peroxide" means a clear colourless inorganic liquid used primarily as a bleach or oxidizer. Hydrogen Peroxide is sold in aqueous solutions, typically 35%, 50% or 70% by weight, in different grades or formulations specifically tailored for enhanced performance in a particular application of the product.

5. Settlement Class Members can claim for any Hydrogen Peroxide purchases from a Defendant. The Defendants who were named in this litigation are:

- Solvay Chemicals Inc. and Solvay S.A. (collectively "Solvay")
- Evonik Degussa Corporation formerly Degussa Corporation, Evonik Degussa formerly Degussa A.G., and Evonik Degussa Canada Inc. formerly Degussa Canada Inc. (collectively "Degussa")
- Eka Chemicals, Inc., Eka Chemicals Canada Inc., and AkzoNobel Chemicals International B.V. (collectively "Akzo")
- Atofina Chemicals Inc., Arkema Inc., Arkema Canada Inc., and Arkema S.A. (collectively "Arkema")
- FMC Corporation and FMC of Canada, Ltd. (collectively "FMC")
- Kemira OYJ and Kemira Chemicals Canada Inc. (collectively "Kemira")

6. Settlement Class Members will not be compensated for purchases of Hydrogen Peroxide that was manufactured by a non-Defendant.

7. The settlement achieved in the related U.S. Litigation apply with respect to persons who purchased Hydrogen Peroxide in the U.S. or from a facility located in the U.S. directly from a defendant during the period from September 14, 1994 to January 5, 2005. Therefore, Settlement Class Members may be eligible for compensation under both the U.S. and Canadian litigation. More information about the U.S. Litigation can be found online at www.HydrogenPeroxideAntitrustLitigation.com. The defendants in the U.S. Litigation are:

- Akzo Nobel Chemicals International B.V.
- Akzo Nobel Inc.
- Arkema Inc. (formerly known as Atofina Chemicals, Inc. and Elf Atochem North America Inc.)
- Arkema France (formerly known as Atofina S.A. and Elf Atochem S.A.)
- Evonik Degussa Gmbh (formerly known as Degussa A.G.)
- Evonik Degussa Corporation (formerly known as Degussa Corporation)
- Eka Chemicals, Inc.
- FMC Corporation
- Kemira Chemicals, Canada, Inc.
- Kemira OYJ, Solvay America, Inc.
- Solvay Chemicals, Inc.
- Solvay S.A.

8. If you filed a claim in the U.S. Litigation, you will receive a notice from the U.S. claims administrator accepting or rejecting your U.S. Claim ("U.S. Decision Notice"). If all or part of your U.S. Claim is rejected, the U.S. claims administrator will include in the U.S. Decision Notice an explanation of why all or part of your U.S. Claim was rejected. If all or part of your U.S. Claim was rejected on the basis that the relevant Hydrogen Peroxide was not purchased in the U.S. or from a facility in the U.S. ("Eligible Hydrogen Peroxide Purchases"), and you would otherwise fit within the Canadian Settlement Class, you can claim for these Eligible Hydrogen Peroxide Purchases in this Subsequent Claim Form. You cannot claim for any other Hydrogen Peroxide purchases in this Subsequent Claim Form. If you are uncertain about the reasons why all or part of your U.S. Claim was rejected, you can contact the U.S. claims administrator toll-free at 1-800-252-5745.

9. In order to be eligible for compensation for your Eligible Hydrogen Peroxide Purchases, you must mail your Subsequent Claim Form to the Claims Administrator postmarked within 30 days of receiving your U.S. Decision Notice. You will be deemed to have received the U.S. Decision Notice within 14 days of the date on your U.S. Decision Notice. You must comply with this deadline even if you are appealing the decision of the U.S. claims administrator in rejecting all or part of your U.S. Claim. The Claims Administrator's address is: Hydrogen Peroxide Claims Administrator, P.O. Box 39030, London, Ontario, N5Y 5L1.

10. You must include with your Subsequent Claim Form, a copy of your U.S. Claim and your U.S. Decision Notice.

11. The Claims Administrator may be reached by telephone at 1-888-665-1125 or by email at claims@hydrogenperoxideclassaction.ca.

Section 2. Identification of Settlement Class Member

Name:

Legal Name of Settlement Class Member

Contact Person (if Settlement Class Member is a corporation)

Address:

No./Apt./Street City

Province Postal Code

Telephone:

Area code / phone no. (Ext. if applicable)

Please list subsidiaries, trade names and addresses in the space provided below:

Your pre-assigned Reference Number (as stated in the Claims Summary):

Please inform the Claims Administrator of all address changes in writing.

If you did not file an original Canadian Claim Form and the Settlement Class Member is a corporation, please provide identification of person signing this Subsequent Claim Form (check one only):

- I am an authorized employee, officer or director of the above-identified Settlement Class Member. I am signing this Subsequent Claim Form to register the Settlement Class Member for settlement benefits.

- I am the trustee, receiver or other representative of the above-identified Settlement Class Member. I am signing this Subsequent Claim Form to register the Settlement Class Member for settlement benefits. Please attach a copy of the court order or other official document appointing you as trustee, receiver or representative and state your name, title, mailing address and telephone number in the space below.

If you have filed an original Canadian Claim Form, please indicate the total amount of Hydrogen Peroxide purchases included in your original Canadian Claim Form: Cdn \$_____.

Please indicate whether you are a Direct Purchaser or a Distributor. Please note that you may fit within more than one category.

- A "Direct Purchaser" means a person or entity in Canada, other than a Distributor, who purchased Hydrogen Peroxide directly from a Defendant.

- A "Distributor" means a person or entity in Canada who purchased Hydrogen Peroxide from a Defendant and resold the Hydrogen Peroxide without further processing or including it in any other product.

Section 3. Eligible Hydrogen Peroxide Purchases

A. Purchase Information

Please complete the following table summarizing your Eligible Hydrogen Peroxide Purchases. You can only include Hydrogen Peroxide purchases that were included in your U.S. Claim and rejected by the U.S. claims administrator on the basis that the relevant Hydrogen Peroxide was not purchased in the U.S. or from a facility in the U.S. You cannot include any other Hydrogen Peroxide purchases.

For each Defendant, you must provide two pieces of information: (1) your total annual Eligible Hydrogen Peroxide Purchases from that Defendant during the Class Period; and (2) the value of your Eligible Hydrogen Peroxide Purchases from that Defendant that were resold without any further processing or including it in any other product. If you resold all or none of your Eligible Hydrogen Peroxide Purchases from a Defendant without any further processing or including it in any other product, you may simply indicate "yes" or "no". If you resold some of your Eligible Hydrogen Peroxide Purchases from a Defendant without any further processing or including it in any other product, please provide the dollar value for such Eligible Hydrogen Peroxide Purchases.

Please list the dollar amounts in Canadian currency. Any rebates, discounts, taxes etc. must be deducted from the dollar amount.

Year	Purchase Information	Akzo	Arkema	Degussa	FMC	Kemira	Solvay
Sept. 14, 1994 - Dec. 31, 1994	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
1995	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
1996	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
1997	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
1998	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
1999	Eligible Hydrogen Peroxide Purchases						

Year	Purchase Information	Akzo	Arkema	Degussa	FMC	Kemira	Solvay
	Hydrogen Peroxide resold without further processing						
2000	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
2001	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
2002	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
2003	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
2004	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						

Year	Purchase Information	Akzo	Arkema	Degussa	FMC	Kemira	Solvay
Jan. 1, 2005 – Jan. 5, 2005	Eligible Hydrogen Peroxide Purchases						
	Hydrogen Peroxide resold without further processing						
Total Eligible Hydrogen Peroxide Purchases							
Total Hydrogen Peroxide resold without further processing							

"Akzo" means Eka Chemicals, Inc., Eka Chemicals Canada Inc. and AkzoNobel Chemicals International B.V.

"Arkema" means Atofina Chemicals Inc., Arkema Inc., Arkema Canada Inc., and Arkema S.A.

"Degussa" means Evonik Degussa Corporation formerly Degussa Corporation, Evonik Degussa formerly Degussa A.G. and Evonik Degussa Canada Inc. formerly Degussa Canada Inc.

"FMC" means FMC Corporation and FMC of Canada, Ltd.

"Kemira" means Kemira OYJ and Kemira Chemicals Canada Inc.

"Solvay" means Solvay Chemicals Inc. and Solvay S.A.

Section 4. Information about your U.S. Claim

A. Details of your U.S. Claim

You must provide the following information and documents:

- (i) specify the amount of your Hydrogen Peroxide purchases that you claimed for in the U.S. Litigation _____;
- (ii) specify the amount of your Hydrogen Peroxide purchases that were rejected by the U.S. claims administrator on the basis that the relevant Hydrogen Peroxide was not purchased in the U.S. or from a facility in the U.S. _____;
- (iii) specify the date of the U.S. Decision Notice _____; and
- (iv) provide a copy of your U.S. Claim, the U.S. Decision Notice and any and all correspondence with the U.S. claims administrator, including but not limited to: requests for further information, responses to requests for further information, and documents relating to payment of the claim.

The documents required under this subsection must, to the extent possible, be provided with your completed Subsequent Claim Form.

B. Authorizations

By signing this Subsequent Claim Form, I hereby authorize the Claims Administrator to contact the U.S. claims administrator to confirm the details of my U.S. Claim, the amount of compensation received or to be received through the U.S. Litigation, details about the rejection of all or part of my U.S. Claim, and any other information that might be necessary for the purpose of processing and evaluating my claim.

I also authorize the U.S. claims administrator to disclose to the Claims Administrator the details of my U.S. Claim, the amount of compensation received or to be received through the U.S. Litigation, details about the rejection of all or part of my U.S. Claim, and any other information that might be necessary for the purpose of processing and evaluating my claim.

By signing this Subsequent Claim Form, I hereby attest that I am aware and understand that failing to provide the information required under section 4, including a copy of my U.S. Claim and U.S. Decision Notice, will disentitle me to compensation under the settlements.

Section 5. Compensation Received Through Private Settlements (Complete only if you did not file an Original Canadian Claim Form)

A. Confirmation of Private Settlement

Have you filed entered into a private settlement with a Defendant? Yes No

If yes, you must provide the following information:

(i) specify which Defendant(s) you have entered into private settlements with _____

(ii) specify the amount of your Hydrogen Peroxide purchases that you settled as part of the private settlement(s) _____

Subject to any confidentiality obligations under the terms of the private settlement agreement(s), please provide any other information or documents relating to the private settlement agreement(s) that the Claims Administrator might consider necessary for the purpose of processing and evaluating your claim, such a copy of your release of claims.

The documents required under this subsection must, to the extent possible, be provided with your completed Subsequent Claim Form.

B. Authorizations

By signing this Subsequent Claim Form, I hereby authorize the Claims Administrator to contact the Defendants in order to confirm whether I have entered into a private settlement, the amount of my Hydrogen Peroxide purchases that I settled as part of the private settlement(s), and any other information that might be necessary for the purpose of processing and evaluating my claim, such a copy of my release of claims.

I also authorize Defendants to disclose to the Claims Administrator whether I have entered into a private settlement, the amount of my Hydrogen Peroxide purchases that I settled as part of the private settlement(s), the amount of compensation I received through the private settlement agreement, and any other information that might be necessary for the purpose of processing and evaluating my claim, such a copy of my release of claims.

C. Subsequent Private Settlement

I agree that if subsequent to filing this Subsequent Claim Form I enter into a private settlement with a Defendant(s), I will notify the Claims Administrator immediately and provide the Claims Administrator with the information and documents required under subsection A of this section 5.

By signing this Subsequent Claim Form, I hereby attest that I am aware and understand that failing to provide the information required under section 5 will disentitle me to compensation under the settlements.

Section 6. Declaration

I declare under penalty of perjury that the information on this Subsequent Claim Form is true, correct and complete to the best of my knowledge, information and belief.

Date Signed

Signature (Claimant or Representative)

To be eligible for compensation under the settlements for your Eligible Hydrogen Peroxide Purchases, you must mail your Subsequent Claim Form to the Claims Administrator postmarked within 30 days of receiving your U.S. Decision Notice. You will be deemed to have received the U.S. Decision Notice within 14 days of the date on your U.S. Decision Notice. You must comply with this deadline even if you are appealing the decision of the U.S. claims administrator in rejecting all or part of your U.S. Claim.

Please mail this Subsequent Claim Form to the following address:

Hydrogen Peroxide Claims Administrator
P.O. Box 39030
London, ON N5Y 5L1

Privacy Statement

All information provided by the Claimant is collected, used, and retained by the Claims Administrator and Class Counsel pursuant to the *Personal Information Protection and Electronic Documents Act* (PIPEDA) for the purposes of administering the Solvay, Degussa, Akzo and Kemira Settlement Agreements, including evaluating the Claimant's eligibility status under the Settlement Agreements. The information provided by the Claimant is strictly private and confidential and will not be disclosed without the express written consent of the Claimant, except in accordance with the Solvay, Degussa, Akzo and Kemira Settlement Agreements.

"Class Counsel" is defined as Siskinds LLP of London, Ontario; Sutts Strosberg LLP of Windsor, Ontario; Camp Fiorante Matthews of Vancouver, British Columbia; and Siskinds Desmeules s.e.n.c.r.l. of Quebec City, Quebec.

The "Claims Administrator" is defined as Heffler, Radetich & Saitta LLP of Philadelphia, Pennsylvania, and RicePoint Class Action Services Inc. of London, Ontario.