

Rivest, Schmidt et Associés

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BY EMAIL: Jean-Stephane.Mayer@unifor.org

Montreal, November 30, 2023

Jean-Stéphane Mayer
UNIFOR
505 Crémazie East Boulevard, suite 10100
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RE: UNIFOR
-and- Bell and al.
Grievances Regarding the Mandatory Vaccination Policy
Our File: 112.063/A
ATTN: UNIFOR LOCAL UNIONS

Hello everybody,

Many of you have inquiries regarding the status of the file, so I wanted to take the time to provide you with an update.

Last June, we initiated a series of management conferences with the arbitrator, in order to streamline the proceeding of the hearings and facilitate the presentation of evidence.

The very first management conference was held on June 9, 2023, followed by another one, on November 7, 2023.

On June 9, 2023, the parties agreed, among other things, that the employer's lawyer, would undertake three tasks, so we could position ourselves in regards of the management of this case:

- 1) Indicate, whether or not, there was an agreement regarding the inclusion of other employers to this litigation (other than Bell Canada itself);
- 2) To confirm whether or not, the employers agreed with the three categories of grievances we have suggested;

- 3) Provide us with a consolidated list of grievances, subsequent to the submission of our list.

Despite delays on the employer's side, here are the latest available updates:

- 1) The parties reached to an agreement, (subject to the terms of a written agreement between the parties to be signed, stipulating that this inclusion is made without admission and can't be used as a precedent in the future) stipulating that all the following employers will be part of the litigation: Bell MTS, Bell West, Bell Canada, Bell Solutions Techniques inc., Télébec S.E.C., Expertech Bâtitseur de réseaux Inc., Northerntel
- 2) The employers have proposed categories, different from ours.

In this regard, discussions with the Arbitrator begun, on November 7th, 2023, as to how the Tribunal will decide which categories should apply here.

The crucial aspect in this situation, is that various situations can be addressed by the Tribunal.

We will discuss this matter again, on December 21st, 2023. We intend to suggest that the Tribunal should determine the applicable categories, after hearing all the evidence.

Each party would introduce witnesses, in relation to all the categories of grievances submitted on both sides, to better portray the situation to the Arbitrator.

We will suggest that the Arbitrator retain jurisdiction following the first award to rule, through an expedited arbitration process, on specific issues that may apply to certain grievances, such as questions of prescription, or disagreements as to the category to which a grievance belongs.

- 3) We have received the employer's consolidated list and will sent it to you, so you can share with us, any useful information, related to this matter. If we have any disagreements, we must be able to address these, on December 21st, 2023.

Of course, other procedural elements have been discussed during the case management conferences. However, since we did not have the elements from the employers' side, we have not yet reached to a final decision, on how the parties will proceed.

On another note, we want to point out that, since we have not received the employers' categories of grievances, it was not possible for us to finalize our meetings with potential witnesses and make our choice of representative witnesses. Several preliminary meetings have already been held, but the exercise remains to be completed.

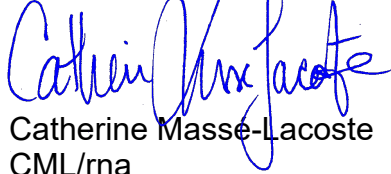
Now that we have a better understanding of the employers' position, I'll be able to move forward with the preparation of evidence. To this end, in January 2024, we'll reach out to the people we need to meet and you will be informed of the selected witnesses.

Rest assured you'll be made aware of any upcoming developments.

In the meantime, feel free to reach out, if you want to share more information with us, or if you have any concerns or questions.

Best regards,

RIVEST SCHMIDT



Catherine Masse-Lacoste
CML/rna

c.c: Roch Leblanc
Daphné Blanchard-Beauchemin
Olivier Carrière