



ANNEXURE A

NOTICE OF PROPOSED SETTLEMENT

You are receiving this notice because records show that you may have purchased a Toyota Hilux, Prado and Fortuner vehicle with a 1GD-FTV or 2GD-FTV diesel engine:

- **between 1 October 2015 and 23 April 2020**, in which case you are likely to be a Group Member in the **Williams DPF Class Action** (unless you have already opted out of this class action);

or

- **between 24 April 2020 and 31 July 2025**, by way of **private sale**, from a person who purchased the vehicle new between 1 October 2015 and 23 April 2020, in which case you are likely to be a Group Member in the **Taylor DPF Class Action** (unless you already opted out of this class action).

Together, the Williams DPF Class Action and Taylor DPF Class Action are referred to in this notice as the **Toyota DPF Class Actions**.

Please read this notice carefully. It contains important information about the **Proposed Settlement** of the Toyota DPF Class Actions.

This is an important notice issued to you by the Federal Court of Australia.

A PROPOSED SETTLEMENT OF THE TOYOTA DPF CLASS ACTIONS

- 1 The parties have agreed to settle the Toyota DPF Class Actions (**Proposed Settlement**).
- 2 Under the Proposed Settlement, Toyota has agreed to pay a total **Settlement Sum** of **\$750 million**, inclusive of costs and any payments made to the Funder (see Section F below).
- 3 Payment of the Settlement Sum is in full and final satisfaction of the Claims brought by the applicants on their own behalf and on behalf of Group Members in the Toyota DPF Class Actions.

B COURT APPROVAL

- 4 The Proposed Settlement is subject to Court approval.

- 5 The Court will only approve the Proposed Settlement if it is satisfied that the Proposed Settlement is fair and reasonable having regard to the interests of Group Members as a whole.
- 6 If the Court approves the Proposed Settlement, the Settlement Sum (less any costs and payments to the Funder approved by the Court, as described in Section F below) will be distributed to “**Registered Group Members**” (as defined in Section D below).
- 7 The Court will decide whether to approve the Proposed Settlement at a hearing commencing at 10:15 am on 20 November 2026 (**Settlement Approval Hearing**).

C ESTIMATED PAYMENTS TO REGISTERED GROUP MEMBERS

- 8 The Settlement Sum (less any costs and payments to the Funder approved by the Court) will be distributed to Registered Group Members in accordance with a **Settlement Distribution Scheme** approved by the Court at the Settlement Approval Hearing.
- 9 It is estimated that, on average, and before accounting for any Court approved deductions for costs and payments to the Funder (see Section F below), Registered Group Members will receive approximately:
 - (a) \$9,600 to \$11,600 if they acquired their vehicle new and still own it;
 - (b) \$2,860 to \$5,900 if they acquired their vehicle used and still own it;
 - (c) \$1,800 to \$1,900 if they acquired their vehicle new and no longer own it; and
 - (d) \$300 to \$780 if they acquired their vehicle used and no longer own it.
- 10 The exact amounts which Registered Group Members will receive will depend on their individual circumstances, including when they acquired their vehicle, how much they paid for their vehicle and whether Toyota has effectively repaired the DPF in their vehicle.
- 11 Toyota has promised that it will **not** refuse to repair the DPF system in any Relevant Vehicle free of charge on account of the vehicle’s owner having received a share of the Settlement Sum pursuant to the Settlement Distribution Scheme (or having registered to do so).

D ELIGIBILITY TO RECEIVE MONEY IN THE PROPOSED SETTLEMENT

- 12 At the Settlement Approval Hearing, the parties intend to apply to the Court for an order that only Group Members who registered their interest to receive money in the



Toyota DPF Class Actions by 9.30 am (AEDT) on 13 October 2026 (**Registered Group Members**) will be entitled to receive money from the Proposed Settlement.

- 13 If this order is made, Group Members who are not Registered Group Members will not be eligible to receive money from the Proposed Settlement without leave of the Court. You should seek independent legal advice if you previously opted-out of the Toyota DPF Class Actions or are not a Registered Group Member and wish to seek leave from the Court to receive money from the Proposed Settlement.

E WHAT REGISTERED GROUP MEMBERS NEED TO DO

- 14 If you are a Registered Group Member and have already completed **and** submitted your registration form, you do not need to do anything further at this time. You will be contacted in due course. **However**, if you are a Registered Group Member and have **not** yet completed **and** submitted your registration form, **you should proceed immediately to provide any missing details**, so that the amount of money you may be entitled to receive from the Proposed Settlement can be calculated. You can do this at: <http://www.toyotaaction.deloitte.com.au/>

F DEDUCTIONS FROM THE SETTLEMENT SUM

- 15 The costs of conducting the Toyota DPF Class Actions on behalf of Group Members were funded by a company called Balance Legal Capital (**Funder**). In funding the Toyota DPF Class Actions, the Funder took on the risk that the class action would not be successful, in which case the Funder would not have received any return from funding the class action and would instead have been required to pay Toyota's costs of defending the class action (in addition to the applicants' costs). The Funder has provided funding in excess of \$35 million for the applicants since the commencement of the Toyota DPF Class Actions, including to fund the applicants during two appeals.
- 16 At the Settlement Approval Hearing, the applicants and/or the Funder will seek the Court's approval to deduct from the Settlement Sum prior to its distribution to Registered Group Members:
- (a) the applicants' reasonable costs of conducting the Toyota DPF Class Actions on behalf of Group Members which have not already been paid by Toyota (including deferred and uplift fees);
 - (b) the reasonable costs of administering the Settlement Distribution Scheme;
 - (c) payments to the applicants and sample group members appointed by the Court, to reimburse them for their time and efforts in representing the Group Members; and



- (d) a payment to the Funder of 32.5% of the Settlement Sum, in recognition of its financial support for the Toyota DPF Class Actions and the risks it took on in providing this financial support over the course of the Toyota DPF Class Actions and related appeals.

- 17 These deductions will only be made to the extent that the Court considers them to be fair and reasonable.
- 18 If these deductions for costs and payments to the Funder are approved by the Court, it is estimated that, on average, and after accounting for these deductions, Registered Group Members would receive approximately:
 - (a) \$6,100 to \$7,370 if they acquired their vehicle new and still own it;
 - (b) \$1,820 to \$3,750 if they acquired their vehicle used and still own it;
 - (c) \$1,140 to \$1,210 if they acquired their vehicle new and no longer own it; and
 - (d) \$190 to \$495 if they acquired their vehicle used and no longer own it.

G OBJECTIONS TO THE PROPOSED SETTLEMENT

- 19 If you are a Group Member and wish to object to the Court approving the Proposed Settlement, you should send a completed copy of the Notice of Objection annexed to this notice by **4:00 pm on 10 November 2026**:

By email to: qe-toyota@quinnemanuel.com

OR

**By post to: Toyota DPF Class Actions Team
Quinn Emanuel
Level 25, 85 Castlereagh Street
Sydney NSW 2000**

- 20 The Court will consider any objections submitted by Group Members at the Settlement Approval Hearing. You, or your representative, may appear at the Settlement Approval Hearing and make oral submissions in support of any objections. If you do not appear, your objections will be considered in your absence.
- 21 Information about how to attend the Settlement Approval Hearing will be available on the Court's website, and may include options to attend online or by telephone.



H FURTHER INFORMATION

- 22 Copies of documents filed and orders made in the Toyota DPF Class Actions can be accessed here: <https://www.toyotaaction.com.au/williams/williams-court-documents/> (Williams DPF Class Action documents) and <https://www.toyotaaction.com.au/taylor/taylor-court-documents/> (Taylor DPF Class Action documents)
- 23 **This is not a scam.** You can check that the Toyota DPF Class Actions are genuine class action proceedings (and get further information) by:
- (a) visiting the website of the Federal Court of Australia where the Toyota DPF Class Actions are registered at <https://www.fedcourt.gov.au/law-and-practice/classactions/class-actions>;
 - (b) visiting the website for Group Members in the Toyota DPF Class Actions at <https://www.toyotaaction.com.au/>; or
 - (c) contacting the Applicants' lawyers, Quinn Emanuel, by emailing qe-toyota@quinnemanuel.com.



ANNEXURE

FEDERAL COURT OF AUSTRALIA

DISTRICT REGISTRY: NSW

DIVISION: GENERAL

No. NSD1210 of 2019

**KENNETH JOHN WILLIAMS & ANOR V TOYOTA MOTOR CORPORATION
AUSTRALIA LIMITED**

No. NSD1326 of 2025

**MARDY ROBERT JOHN TAYLOR V TOYOTA MOTOR CORPORATION
AUSTRALIA LIMITED**

NOTICE OF OBJECTION TO PROPOSED SETTLEMENT

TOYOTA DPF CLASS ACTIONS

Complete this form if you wish to object to the Proposed Settlement.

Your Notice of Objection will be considered by the Court when it is determining whether or not to approve the Proposed Settlement.

If you wish to object to the Proposed Settlement, your Notice of Objection must be submitted by 4.00pm on 10 November 2026.

Any objection received after this time may not be accepted.

If you do NOT wish to object to the proposed settlement, you do NOT need to return this form.

To: Toyota DPF Class Actions Team, Quinn Emanuel

By email to: qe-toyota@quinnemanuel.com

OR

**By post to: Toyota DPF Class Actions Team
Quinn Emanuel
Level 25, 85 Castlereagh Street
Sydney NSW 2000**



The person identified below gives notice that they object to the proposed settlement of the abovementioned proceeding.

A. DETAILS OF OBJECTOR

Name of group member	
Full name of person completing this form (print):	
Authority of person completing form (e.g. company director, lawyer)	
Relevant Vehicle Model Year(s) and Model Line(s)	
Vehicle Identification Number(s)	
Telephone contact	
Postal address	

Please enclose any documentary evidence of purchase and ownership of a Relevant Vehicle.

B. GROUND(S) OF OBJECTION

I object to the Proposed Settlement on the following grounds. Please enclose any additional pages setting out any grounds of objection.

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The Settlement Approval Hearing is listed before Justice Lee at 10.15 am on 20 November 2026 in Sydney. You may appear at the Settlement Approval Hearing and object to the proposed settlement. If you do not appear at that hearing, your objection will be considered in your absence.

Date:

Signed:

Name: