COMPETITION TRIBUNAL
TRIBUNAL DE LA CONCURRENCE

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PUBLIC 1

CT-2022-02

THE COMPETITION TRIBUNAL

IN THE MATTER OF the Competition Act, RSC 1985, c C-34;

AND IN THE MATTER OF the proposed acquisition by Rogers Communications Inc. of Shaw Communications Inc.;

AND IN THE MATTER OF an Application by the Commissioner of Competition for an order pursuant to section 92 of the *Competition Act*;

BETWEEN:

COMMISSIONER OF COMPETITION

Applicant

and

ROGERS COMMUNICATIONS INC. SHAW COMMUNICATIONS INC.

Respondents

and

ATTORNEY GENERAL OF ALBERTA VIDÉOTRON LTD.

Intervenors

WITNESS STATEMENT OF SUDEEP VERMA

I, **Sudeep Verma**, of the City of **Toronto** in the province of **Ontario**, state as follows:

BACKGROUND

1. This witness statement is supplemental to my previous affidavit, sworn February 24, 2022. Attached as Exhibit "A" to this witness statement is a copy of that affidavit, which I reaffirm and adopt as my evidence for the purposes of this statement.

2. I have personal knowledge of the matters in this statement, except where I have indicated that I am relying on information from others, in which case I believe such information to be true.

PURPOSE OF THIS WITNESS STATEMENT

- 3. I make this witness statement in connection the Commissioner of Competition (the "Commissioner")'s proceeding involving Rogers and Shaw relating to their proposed merger.
- 4. The purpose of this witness statement is to supplement my affidavit sworn February 24th on how my businesses have fared since that time.
- 5. In my February 24th affidavit, I stated that I was the owner of 17 Freedom retail stores across Canada. I am now the owner of 15 Freedom stores. In March 2022, my store in Lindsay, Ontario was temporarily closed. In April 2022, my store on Woodroffe Avenue in Nepean was permanently closed.

INEFFECTIVE PROMOTIONS (BACK TO SCHOOL IN PARTICULAR)

- 6. Historically, Freedom was known as a disruptor brand that offered deep value for consumers, in contrast to the "Big Three". Freedom was known having favourable savings of approximately 30% in comparison to the "Big Three", and even 20% savings in comparison to "Big Three" flanker brands, like Fido.
- 7. One particularly distinctive marketing advantage that Freedom was well-known for involved \$0 promotions on "flagship" phones in high demand like the iPhone and Samsung devices. These initiatives were game-changers for consumers and drove many customers to our storefronts. These initiatives were a key aspect of Freedom's strategic advantage at the time.
- 8. These initiatives also forced incumbent telecom companies to compete to follow some of Freedom's revolutionary ideas and strategies.
- 9. These revolutionary ideas do not happen with Freedom promotions today. Today, Freedom has become a purely reactionary organization with a lack of aggressive, competitive offers, seemingly content on keeping the "status quo" until the results of the

proposed merger are known. In particular, Freedom's signature advantage of offering \$0 hardware promotions has now been completely eliminated across-the-board. Instead, Freedom has chosen to focus on "bring your own phone" plans. As a result, because Freedom has not offered aggressive hardware and wireless packages in the marketplace, flanker brand pricing is now very similar to Freedom's, and Freedom's historical pricing advantage has been virtually eliminated.

- 10. While I understand that brands have to evolve in accordance with the marketplace, core problems with the Freedom business result from a lack of any effective advertising by Freedom in recent months, and in particular since the merger was announced.
- 11. This was most recently demonstrated in the back-to-school promotional period. For Freedom dealers, the back-to-school period (a period of approximately six to eight weeks) is critical to dealer profitability. Combined with the holiday season, these periods account for approximately 80 percent of overall dealer profitability.
- 12. Contrary to prior years, in which Freedom was a market-leader with aggressive and prominent campaigns, Freedom's back-to-school promotions this year were uninteresting and very similar to offerings from other cell phone providers. There were simply no aggressive promotions by Freedom to distinguish itself from other brands.
- 13. Although I do not have access to Freedom data to know how much it spends on advertising and brand visibility, I, as well as many other F-Branded Association dealers perceive a dramatic reduction in Freedom's recent advertising efforts.
- 14. Unlike in the past, there are no transit ads, few (if any) highway billboards, and not many television or radio ads. Instead, it would appear that Freedom has downloaded the advertising effort on dealers to use their own co-op dollars for brand awareness.
- 15. Freedom is engaging in limited social media ads and other branding activity in conjunction with the back-to-school period, but the messaging involves unclear messaging on emojis and workouts, which create little brand recall and has not helped in driving traffic to stores. Dealers have seen dwindling customer engagement on social media posts. The few comments are seen usually involve excoriating complaints against Freedom. Overall, national marketing by Freedom has been curtailed to a large extent.

- During the months leading to back-to-school, the F-Branded Association repeatedly raised concerns about ineffective promotions and advertising surrounding back-to-school with Freedom's executives. There were no meaningful responses from Freedom, other than to tell dealers that they should raise and discuss these issues at the local level with dealer DBMs (district business managers).
- 17. In addition, during this most recent round of back-to-school promotions, the unavailability of 5G network for Freedom served as a significant competitive deterrent to other brands and networks. As I described in my earlier affidavit, Freedom's promotional roll-out of 5G was cancelled and Freedom is unable to offer 5G services to its customers. Dealers cannot tell customers that Freedom will eventually offer 5G, because there is no indication that it ever will. This has been a significant deterrent in attracting back-to-school customers, particularly when the devices that dealers sell are 5G capable.
- 18. While Fido does not currently offer 5G capabilities, Fido dealers can be confident in assuring its customers that its Rogers-friendly network eventually will, unlike Freedom's. Due to this lack of competitiveness, incumbents are using this delay as an opportunity to aggressively come up with offers through their flanker brands to reduce the value of Freedom's brand and its potential to be a viable option to the "Big Three".
- 19. A related issue to the lack of 5G network involve ongoing questions from existing customers about whether Freedom is maintaining its existing network. Customers are increasingly complaining about network "dead spots" and dropped calls compared to previous periods. There is little to nothing that dealers can do to assist these unsatisfied customers, some of whom cancel their Freedom contract.

ONGOING LACK OF INVENTORY

20. A persistent lack of inventory of an ongoing challenge for dealers, which further compounds the challenges we are facing. I (and all other dealers) are not able to order the desired quantity of the top saleable devices. All iPhone and Samsung models, which are very popular phones, have thresholds on ordering. Sometimes dealers are only allocated one or two such devices, per store. Although the Freedom's online ordering portal states that additional amounts of these phone models are available to be ordered, a dealer is unable to place any order after minuscule threshold limits allocated to dealers are reached.

21. To the same effect, for several weeks in Q1 and Q2 of 2022, there were simply no available supplies of iPhone 13 for dealers. This was particularly frustrating because the lack of inventory corresponded with Freedom promotional activity specifically focused on the iPhone 13 (iPhone 13 Pro Max 256GB). There is no purpose in spending promotional money if there is no inventory. Few customers are willing to pursue promotions for phone hardware involving an uncertain and unclear delivery date potentially several weeks in the future. This alienated many in-store customers.

TIMING OF PROPOSED MERGER

22. The timing of the proposed merger review has been difficult for my businesses and other F-Branded Association dealers. Freedom dealers are caught in a "holding pattern" on the future of the business until the result of the proposed merger is known. In the meantime, real estate leases with commercial landlords have come and are coming due, putting pressure on dealers on whether they should renew their leases for new terms, amid shrinking business and an unclear commitment to the Freedom brand by Shaw. Whatever the result may be, dealers would like the process to come to a close as soon as possible, so that we can make plans with some sense of the future.

Signed this 22nd day of **September**, 2022.

Sudeep Verma

Exhibit "A" to the Witness Statement of Sudeep Verma

THE COMPETITION TRIBUNAL

IN THE MATTER OF the Competition Act, R.S.C. 1985, c. C-34;

AND IN THE MATTER OF the proposed acquisition by Rogers Communications Inc. or an affiliate thereof of Shaw Communications Inc.;

AND IN THE MATTER OF an application by the Commissioner of Competition for one or more orders pursuant to section 92 of the Competition Act;

AND IN THE MATTER OF an application by the Commissioner of Competition for an interim order pursuant to section 104 of the *Competition Act*;

BETWEEN:

THE COMMISSIONER OF COMPETITION

Applicant

– and –

ROGERS COMMUNICATIONS INC.
SHAW COMMUNICATIONS INC.

Respondents

AFFIDAVIT OF SUDEEP VERMA

I, Sudeep Verma, of the City of Toronto in the province of Ontario, state as follows:

BACKGROUND

- 1. I am an owner of 17 Freedom Mobile ("**Freedom**") retail stores across Ontario. These stores are in the following communities: Etobicoke, Toronto, Oshawa, Bowmanville, Peterborough, Lindsay, Kanata and Ottawa.
- 2. Prior to my involvement with the Freedom brand, I was a representative of Bell and Public Mobile.
- I am also a member of the Association of Freedom Wireless Dealers ("F-Branded Association"). This is an association of all Freedom Mobile retail stores across Canada who wish to join, which was established on April 7, 2021, shortly after Rogers Communications Inc. ("Rogers") announced that it had agreed to acquire Shaw Communications Inc. ("Shaw"). The F-Branded Association has 22 members, representing 179 Freedom retail locations in Ontario and Alberta. The members represent approximately 80% of Freedom retail stores across Canada, including all Alberta dealers and the majority of Ontario dealers (18 out of 21). Our members, many of whom began operations before Shaw acquired Wind Mobile in 2017, own anywhere from 1 to 22 locations.
- 4. The F-Branded Association was established to work proactively to discuss collective business issues and concerns between Freedom retail stores and Shaw.
- I have personal knowledge of the matters in this statement, except where I have indicated that I am relying on information from others, in which case I believe such information to be true.

PURPOSE OF THIS WITNESS STATEMENT

6. I make this Witness Statement in connection with an Application by the Commissioner of Competition (the "Commissioner") against Rogers and Shaw relating to their proposed merger.

FREEDOM WIRELESS DEALERS - TARGET CUSTOMERS AND DEMOGRAPHICS

- 7. All Freedom retail locations (sometimes described as Freedom dealers) sign contracts with Shaw. Under the contracts, retailers are required to charge prices set by Freedom and must follow certain brand standards in terms of look and feel and design of stores, as set by Freedom.
- 8. Freedom dealers represent the Freedom brand in the retail distribution channel, carrying exclusively Freedom-branded offerings. Dealers sell Freedom products to retail customers and provide ancillary services such as troubleshooting and managing customer inquiries, as well as addressing issues such as buyer's remorse, warranties and exchanges. Freedom dealers also accept monthly bill payments and sell prepaid top-up vouchers to customers.
- 9. Freedom dealers, including myself, started their businesses because we saw a market opportunity. We viewed Bell, Rogers and TELUS as focusing revenue growth on selling upgrades to existing customers. By contrast, Freedom dealers saw a chance to target an underserved market by gaining market share with new Canadians or customers who were first-time cell phone purchasers. Freedom dealers position their retail stores within local communities in which these opportunities are thought to exist.
- 10. Based on market research by the F-Branded Association and our knowledge of the instore experience, the primary customer segments that rely on Freedom retail services are mid-to-low income earners, new Canadians, visible minorities, students and seniors.
- 11. Based on data from our customer postal codes and StatsCan, our customers live in areas with mid-to-low average incomes, with high concentrations of new Canadians and high concentrations of visible minority populations. Attached as Exhibit "A" to this affidavit is an analysis prepared by the F-Branded Association, which compares the postal codes of its customers in the GTA area and compares those postal codes to information from the City of Toronto as to average family income, concentration of new immigrants, and concentration of visible minority population.
- 12. The F-Branded Association reviewed marketing spend by its members, which suggested that 63% of average dealer advertising spend is through ethnic media channels such as booths at ethnic outdoor festival events and advertisements in foreign languages such as

- Chinese or Punjabi. Attached as Exhibit "**B**" to this affidavit are examples of ethnic advertising by Freedom dealers, including marketing initiatives to international students.
- 13. Freedom also targets students with its advertising. Attached as Exhibit "C" to this affidavit is a sample Back-to-School promotional campaign dated July 25, 2019, which focuses on affordable plans for students and provides sample talking points to Freedom dealers to favourably compare Freedom plans to Rogers. Freedom stands for affordability in the marketplace, which resonates with student customer groups.
- 14. Attached as Exhibit "D" to this affidavit is an analysis prepared by the F-Branded Association to show the percentage of prepaid customers, versus postpaid. Based on this sales data, prepaid users make up 43.1% of F-Branded Association customers, a rate which has steadily increased since 2018 when they made up 22.9% of our customers. In my experience, prepaid plans are attractive for financial reasons and because customers may not qualify for post-paid, for example, due to poor credit ratings, and for customers with low phone usage requirements, such as seniors. The source of this data in the analysis is actual sales recorded in the point-of-sale software at the store level and an average across the membership of the association.

FREEDOM WIRELESS DEALERS - OPERATIONS AND COMPETITIVE BACKGROUND

- 15. Freedom competes with other wireless service retailers in many aspects that consumers care about such as price, talk and text, data, long-distance minutes, customer service, available devices, warranties, no surprises, no bill shocks, no data overages, and the ability to obtain the same plans on postpaid and prepaid. Attached as Exhibit "E" to this affidavit is a training document dated March 21, 2018, entitled "A Success Attitude Pride in Freedom Mobile, and belief in the strength and future of the brand." The Exhibit describes certain core aspects of Freedom's brand and marketing, including unlimited and affordable wireless services; no data overage charges; and no fixed-term contracts.
- 16. Since the inception of Wind Mobile, and subsequently Freedom Mobile, the objective of the brand has been to be an innovator and a disrupter in the wireless industry, offering better plans to consumers at affordable prices and forcing incumbents to match Freedom's competitive offers. Attached as Exhibit "F" to this affidavit is an e-mail enclosing a message

from Alek Krstajic, the former CEO of Freedom Mobile, which states in part that Freedom has succeeded "against all odds as underdogs in an industry dominated by the Big Three – by providing an affordable, high-value alternative service for wireless customers." The e-mail further refers to the fact that Freedom "continues to upgrade our network […] and continue to provide customers with freedom from data overages, freedom from pricegouging, flat monthly fees – affordable everything."

- 17. Wind Mobile did not sell new iPhones because its network did not qualify for iPhone use. However, after Shaw acquired Wind in 2016, Shaw invested in network upgrades that eventually allowed Freedom to begin offering iPhones to its customers, in or about December 8, 2017. Giving Freedom dealers the ability to offer iPhones to its customers was a significant development which put Freedom on the same competitive footing as other wireless brands.
- 18. Wind/Freedom is a pioneer in industry-leading reforms, which the incumbents ultimately matched, helping Canadian consumers. Some examples of these disruptions include: (a) unbundling device pricing from rate plans, which meant customers did not have to continue paying for their hardware once devices were paid off (in a two-year term), and (b) introducing "Big Gig data" on rate plans, which meant consumers had abundant data as compared to incumbents who did not offer these plans, but which ultimately forced incumbents to follow suit. A summary of some of Freedom's pioneering competitive initiatives is described below.
- 19. In 2017, Freedom reduced deposit requirements, allowing customers that did not previously qualify for post-paid plans due to their credit score to enter plans with little to no deposit.
- 20. In 2017, Freedom introduced Big Gig, giving customers more data than previous plans at a reasonable price. Attached as Exhibit "**G**" to this affidavit is a Freedom publication dated October 16, 2017, which summarizes the details of this plan.
- 21. Attached as Exhibit "H" to this affidavit is a chart entitled "Big Gig Steep Discounts Establish Freedom as Value Leader" dated November 1, 2017, which shows Freedom's positioning in the market by comparing the "Big Gig" price and data allotment for Freedom, compared to competing brands. Attached as Exhibit "I" to this affidavit is an e-mail from Paul McAleese, who was then President of Freedom Mobile Communications, dated

August 1, 2018. The e-mail discusses the launch of Big Gig data plans with no overage fees and describes "taking aim at the practices that charge wireless users astronomical fees when they go over their data limit" by promoting "our data-rich Big Gig plans."

- 22. Freedom heavily invested in advertising the new Big Gig promotion, which received favourable media coverage. A sampling of these advertisements and media coverage can be found at: https://strategyonline.ca/2018/08/07/freedom-mobile-tells-customers-they-deserve-to-be-free-from-fees/.
- 23. Freedom marketed a similar promotion in November 2018, called "Big Binge Bonus." This was a plan that offered up to 100gb of additional LTE data for customers who signed up to a Big Gig plan and a new smartphone on a two-year term. This promotion was not as successful as Freedom's prior year Big Gig campaign because in 2018, Bell, Telus and Rogers were engaged in a form of price war, in which these incumbents offered \$60 monthly plans with unlimited data for both new and existing customers. Many prospective customers viewed Bell, Telus and Rogers' plans as superior to the Freedom "Big Binge Bonus."
- 24. Throughout our history as Freedom dealers, we have strived to make Freedom the most attractive choice for customers moving over from the "big 3" incumbent providers. Attached as Exhibit "J" to this affidavit is a chart from the F-Branded Association, which reflects that 61% of total Freedom activations are port-ins from Rogers, Fido and Chatr. The source for this data is a member dealer operating more than 10 locations in the GTA and who has been tracking port-in at the store level via the point-of-sale software. There has been a conscious effort on part of Freedom to position itself as an alternative to the "Big Three". Attached as Exhibit "K" to this affidavit is a "Freedom Mobile Competitor Comparison" document prepared by Freedom.
- 25. To communicate these advantages to customers, dealers use marketing and purchase advertisements and engage with customers in-store.

RIVALRY BETWEEN ROGERS AND SHAW

26. Freedom dealers view Rogers and its flanker brands as our primary competitors. As described in Exhibit "J", F-Branded Association data indicates that 61% of Freedom port-

ins come from Rogers, Fido and Chatr, with the remainder coming from Bell, TELUS and their respective flanker brands. Further, as described in Exhibit "L", 70% of Freedom retail store locations are within 1km of a Rogers, Fido or Chatr store. The source for this data is the F-Branded Association.

CHANGES AT SHAW SINCE THE ANNOUNCEMENT OF THE MERGER

- 27. F-Branded Association dealers have already felt impacts on our competitive position since the announcement of the acquisition on March 15th, 2021 (the "**Announcement**").
- 28. Since the Announcement, sales quotas from Shaw have decreased. Year-over-year quotas dropped in the first quarter of 2022 compared to the same period in 2021. Quota decreases vary by dealer, but range from 12-38% decreases for pre-paid plans and 28-70% for post-paid plans. Attached as Exhibit "**M**" are communications and quota numbers for the year 2020-22 (using Connexion as an example). Attached as Exhibit "**N**" is a summary of F-Branded Association data, showing the percentage range decreases described above.
- 29. For a dealer, the consequences of not meeting the quota are two-fold: (a) a loss of bonus payments and (b) it is considered an "Event of Default" under the dealer agreement.
- 30. From a competitive perspective, quotas have been decreasing because Freedom has not been as competitive with other brands, compared to its historical record as a market disruptor. Historically, Freedom's plans were between 25-30% cheaper than the "big three" and their flanker brands. This is no longer the case, and Freedom's plans are not perceived to be as attractive as they once were. Further, since the merger announcement, sourcing adequate amounts of inventory of sought-after cellphones has been a constant challenge for myself and other Freedom dealers. Although Freedom attributes these inventory shortages to issues like microchip shortages and supply chain issues, we know that our competitors have adequate levels of inventory. If dealers do not have adequate amounts of inventory, we can only offer BYOD plans with limited benefits to dealers. Further, when limited amounts of inventory are received, Freedom is no longer offering attractive subsidies on phones which it had historically offered. As a result, since the announcement of the proposed merger, the combination of (i) limited inventory, (ii) limited

subsidies and (iii) unfavourable wireless plans have led to a scenario in which Freedom and its dealers are no longer perceived as an attractive alternative to the "big three" cell phone companies and their flanker brands. The diminished attractiveness of the Freedom brand has led to reduced demand and reduced dealer quotas as a result.

- 31. Before the Announcement, Shaw had provided the Freedom dealers with promotional and training materials related to the upcoming launch of 5G. After the Announcement, on April 12, 2021, Shaw sent us a communication informing us that the 5G launch was paused indefinitely and requesting that we return the promotional materials. Attached as Exhibit "O" to this affidavit is a memo from Freedom Mobile dated April 8, 2021 with announcements about the rolling-out of 5G plans for Freedom Mobile. Attached as Exhibit "P" to this affidavit is a memo from Freedom Mobile dated April 21, 2021, which describes the indefinite pausing of the launch of the 5G network for Freedom.
- 32. Before the Announcement, Shaw had requested that Freedom dealers renovate their locations for a reimaging at a cost of \$100,000 per store. After the Announcement, F-Branded Association dealers pushed back, due to uncertainty for the future in light of the acquisition. Shaw responded by proposing a reduced scope of renovations to \$15,000 per store. F-Branded Association dealers have not agreed, and these discussions are ongoing. Attached as Exhibit "Q" to this affidavit is a memo from Shaw dated April 8, 2021 described as "Dealer Reno Program 2021." Attached as Exhibit "R" to this affidavit is an e-mail from myself to Freedom Mobile dated May 12, 2021, stating in part that "on numerous occasions and calls (post Rogers/Shaw merger) we have been told to go month to month or 1 year" with respect to our store leases.
- 33. Freedom dealers are uncertain about long-term decisions given the uncertainty surrounding the acquisition. Many members have moved their leases to month-to-month contracts, increasing our costs. Attached as Exhibit "S" to this affidavit is an example of my store location that is month-to-month, in which the landlord has posted a large "for lease" sign on the window. This has impacted the business adversely and employee sentiment. This is an ongoing concern, as store leases come up for renewal and landlords expect clear communication.

34. On December 31st 2021, two Ontario dealers collectively shut down five stores and two Alberta dealers shut down a total of four stores. Also, three more stores were shut down January 31st 2022. Apart from these permanent store closures, there are a few store locations (approximately five) that have been shut down temporarily, pending the outcome of the merger.

SWORN OR AFFIRMED by Sudeep Verma of the City of Toronto, before me at the City of Toronto, in the Province of Ontario, on February 24, 2022 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

Commissioner for Taking Affidavits (or as may be)

Karen Whibley

SUDEEP VERMA

KAREN WHIBLEY

Karen Michelle Whibley, a Commissioner, etc. Province of Ontario, for Sotos LLP, Barristers & Solicitors. Expires October 19, 2024.

This is Exhibit "A" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

A Commissioner for taking Affidavits

Karen Whibley

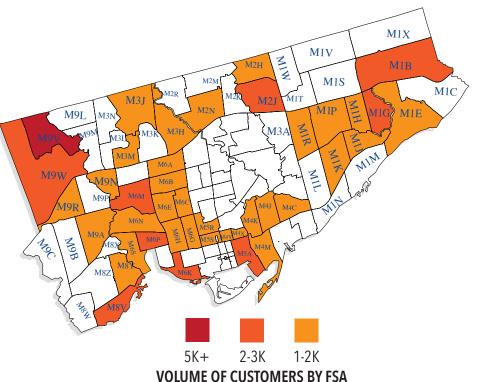
Karen Michelle Whibley, a Commissioner, etc. Province of Ontario, for Sotos LLP, Barristers & Solicitors. Expires October 19, 2024.

Customer Hotspots

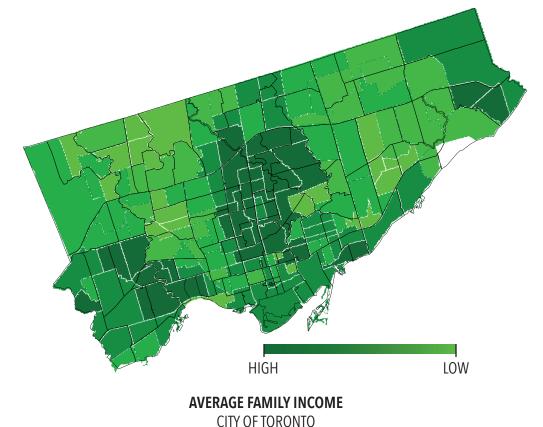
AVERAGE FAMILY INCOME

Freedom Mobile is the choice for most mid-low income





CITY OF TORONTO

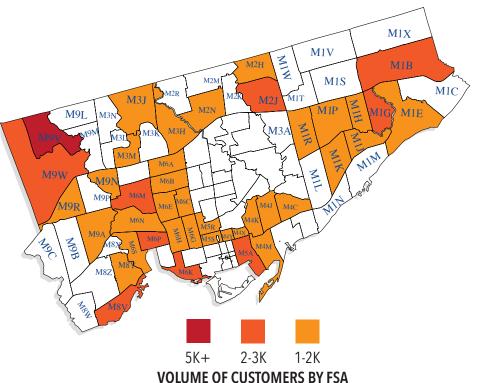


Customer Hotspots

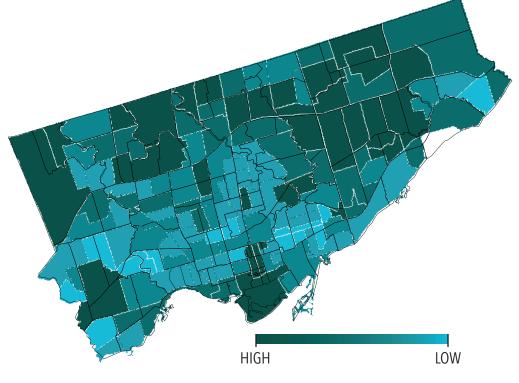
RECENT IMMIGRANTS

Majority of new immigrants rely on Freedom Mobile to get





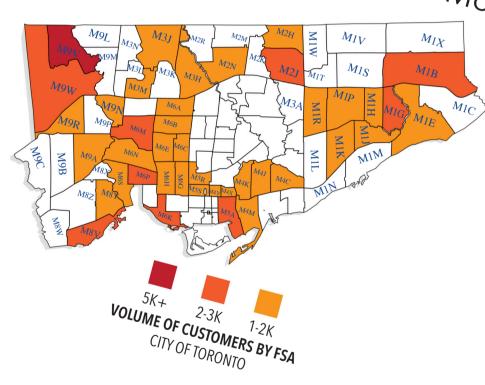
CITY OF TORONTO

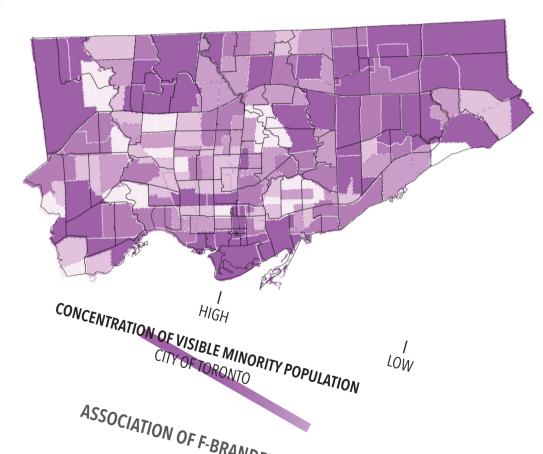


CONCENTRATION OF NEW IMMIGRANTS
CITY OF TORONTO

Customer Hotspots PUBLIC PUBLIC VISIBLE MINORITY

Members belonging to visible minority groups rely heavily on the offerings of Freedom Mobile





ASSOCIATION OF F-BRANDED WIRELESS DEALERS

This is Exhibit "**B**" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

A Commissioner for taking Affidavits

Karen Michelle Whibley, a Commissioner, etc. Province of Ontario, for Sotos LLP, Barristers & Solicitors. Expires October 19, 2024.

Names of Ethnic Media Used/Marketing to Intl Students

Radio	Apna Radio G98.7 Fm Parvasi Radio (1320-
	CJMR) CINA Radio (1650 AM)
	Gaunda Punjab
	South Asian Unlimited- AM 530 Radio Remote
	Radio SHON aired on CMR & CINA
	Frontline Radio 530 AM
	Sarang Radio
	Masti ki Railgadi (CMR Radio)
	RED FM
	South Asian Unlimited

Newsprint	Candian Immigrant
	Magazine
	South Asian Focus
	Punjabi Post
	Gujarat Express
	Urdu Post
	Canadian Pravasi
	Can-India

Ethnic Events	Garba -Maa Ambe Entertainment Inc.
	Garba - Diversity Cultural Association
	Garba -Festival Of Life
	Navratri Garba
	Navrang Navratri
	Atul Purohit Navratri Garba
	Rung De One
	Fusion of Taste (Albion BIA)
	Ukrainian Festival

	Fresher's Party-Fleming
	College
	On site activation booth - Fleming College
College Events	Ryerson University
	University Calendars-Grad
	Media (UOIT, Trent &
Other Advertising at Colleges	Fleming College

Few Pictures of the Ethnic Events



Fusion of Taste Event-2019



Ukranian Festival -2019



South Asian Garba Events -2019

Few Pictures of the Ethnic Radio Remotes





CINA 1650AM (South Asian Radio)

G98.7FM (Caribbean Radio)

Marketing Activities to Reach College Students





DOI: STODE STORE OF METALER PROPERTY OF THE PR

Premium position ad in Resident Students' Planner- UOIT-2019

Sponsored - International Students Fresher's Party, Fleming College -2019





Onsite booth, Ryerson University-Feb, 2020

This Vaisakhi bring home the celebrations



ਜੱਟਾ ਬਈ ਆਈ ਵਿਸਾਖੀ. ਕਣਕਾਂ ਦੀ ਮੱਕੀ ਰਾਖੀ।



Nokia 5230

- Unlimited data
- ·Unlimited 24/7 Canada-wide talk + global text
- · Unlimited CA/US picture messaging
- From any WIND Zone. Conditions apply. See WINDmobile.ca for complete details.

Port in your number and get up to \$100 WIND credits.

Happy Vaisakhi from WINDmobile!





Includes voicemail

for only \$20/month

· Add unlimited calling to India

The Power of Conversation™ You may activate this plan for a limited time only and its availability is subject to change or cancellation without notice. Handset sale prices are only valid with an activation of a plan of \$25/month or higher. Offer is available only while quantities last. Both the Nokia C7 and Nokia 5230 must be activated at the time of purchases of the sale devices using WINDtab; "buy one, get one" offer is not eligible with WINDtab. This offer may be combined with the port-in credit. All services subject to WIND's Terms of Service and are for personal use by an individual. WIND, WIND MOBILE, WINDtab™ are trademarks of Wind Telecommunicazioni S.p.A. and are used under license in Canada by Globalive Wireless Management Corp. THE POWER OF CONVERSATION is a trademark of Globalive Wireless Management Corporation. © 2011 Wind Mobile. Nokia is a registered trademark of Nokia Corporation. © 2010 Nokia. All other trademarks are the property of their respective owners.

WIND STORES BRAMPTON Bramalea City Centre 60 Cottrell Blvd BURLINGTON **Burlington Mall** Walker Place ETOBICOKE Woodbine Centre 270 The Kingsway HAMILTON Lime Ridge Mall Jackson Square MARKHAM Pacific Mall MISSISSAUGA Meadowyale Town Centre Sheridan Mall Erin Mills Town Centre OAKVILLE Oakville Smart Centre Oakville Place OSHAWA Oshawa Centre PICKERING Pickering Town Centre SCARBOROUGH Scarborough Town Centre STONEY CREEK Eastgate Square THORNHILL

> Promenade Coulters Mall TORONTO Queen's Quay Terminal Queen West Rio Can Marketplace Yorkdale Shopping Centre Holt Renfrew Centre Yonge Eglinton Centre Shops at Don Mills 10 Dundas St E College Park Shops Center Point Mall Eglinton & Oakwood Jane & Sheppard Mall Dufferin Mall Main & Danforth 44A Rexdale Blvd Shoppers World Danforth

2049 Weston Rd VAUGHAN Colossus Shopping Centre BLOCKBUSTER® AJAX

1632 Jane St

310 Harwood Ave N BRAMPTON 320 Main St N BURLINGTON 450 Appleby Line

MISSISSAUGA 1151 Dundas St W 1629 Lakeshore Rd W OAKVILLE 1289 Marlborough Ct PICKERING

1360 Kingston Rd RICHMOND HILL 8750 Bayview Ave TORONTO 837 Danforth Ave 2940 Finch Ave E 2432 Eglinton Ave E 75 Hanna Ave

125 The Queensway 5825 Yonge St WHITBY

1615 Dundas St E



ਉਮੀਦ ਨਾਲੋਂ ਜ਼ਿਆਦਾ ਪ੍ਰਾਪਤ ਕਰਨ 'ਤੇ ਬਹੁਤ ਚੰਗਾ ਮਹਿਸੂਸ ਹੁੰਦਾ ਹੈ।



- 5GB ਫਲ-ਸਪੀਡ ਭੇਟਾ (3GB + 2GB ਬੋਨਸ)
- 3¢ /ਮਿੰਟ ਵਿੱਚ ਇੰਡੀਆ ਕਾਲ ਕਰੋ
- ਅਸੀਮਿਤ ਕੈਨੇਡਾ ਭਰ ਵਿੱਚ ਕਾਲਿੰਗ
- ਦਨੀਆ ਭਰ ਵਿੱਚ ਅਸੀਮਿਤ ਟੈਕਸਟ
- ਕੈਨੇਡਾ/ਅਮਰੀਕਾ ਭਰ ਵਿੱਚ ਅਸੀਮਿਤ ਪਿਕਚਰ/ਵੀਡੀਓ ਟੈਕਸਟ
- ਸਰਵਿਸ ਕ੍ਰੈਫ਼ਿਟ ਵਿੱਚ \$5 /ਮਹੀਨਾ ਜਦੋਂ ਤੁਸੀਂ ਆਪਣਾ ਖੁਦ ਦਾ ਫੋਨ ਲਿਆਉਂਦੇ/ਖਰੀਦਦੇ ਹੋ
- WINDtab ਦੇ ਨਾਲ ਨਵਾਂ ਫੋਨ ਖ਼ਰੀਦਣ ਲਈ \$650
- ਅਤੇ ਹੋਰ

\$40^{/ਮਹੀਨ}

ਪੇਸ਼ਕਸ ਛੇਤੀ ਹੀ ਖ਼ਤਮ ਹੋ ਜਾਵੇਗੀ

Galaxy S7 edge



Learn more at WINDmoble.ca. Offer is walld as of April 12, 2016 and is subject to change or cancellation without notice. All plan feabures in Canada are from anywhere on our network, otherwise long distance and rearning rabes apply. Add-on feabures can be used from anywhere on our network of the control o

Ethnic Admats Provided by Freedom (For Punjabi & Chinese Ad/Admats for Print Ads)



The presents in standard for a faircraft oring a prolitiquities Proteined Hallo health Societies eng. and in subject to though or a consolation without extract. So is digital for this presentine, point sections a new law during the presentine protein and provide protein and published for this protein and published for this protein and published for this protein and published for a protein and published for the protein and

加拿大最实惠的无限流量计划





*Freedom Mobile's Big Gig Unlimited data plans include (depending on your selected plan) from 106B to 25GB of Fast LTE (full-speed) data on the Freedom Network, as well as from 500MB to 25GB of Fast LTE (full-speed) data on the Freedom Network (see freedommobile:ac/coverage). Freedom Mobile's Big Gig Unlimited data Canada-U.S. plan includes 30GB of Fast LTE (full-speed) all other is depleted, you will continue to have access to data services, with no data overage fees, but at a slower speed – of up to 256 kilobits per second (for downloads) and 128 kilobits per second (for uploads) on the Freedom Network, and up to 128 kilobits per second (for uploads) on the Nationwide Network or, in the case of the Big Gig Unlimited data Canada-U.S. plan, in the U.S. – until the end of your current billing cycle. Applications such as web browsing, email, instant messaging, voice over IP services, or low-quality audio streaming will continue to work, but at a slower speed. Applications that normalized this such as video streaming or peer-to-peer file sharing will also continue to work, but the slower speed may affect application performance. We will send you a text message notifying you when you have used 70% and 100% of the Fast LTE (full-speed) allotment included in your plan, at which point you may choose to purchase a Fast LTE (full-speed) allotment included in your plan, at which point you may choose to purchase a Fast LTE (full-speed) allotment included in your plan, at which point you may choose to purchase a Fast LTE (full-speed) allotment included in your plan, at which point you may choose to purchase a Fast LTE (full-speed) allotment included in your plan, at which point you may choose to purchase a Fast LTE (full-speed) allotment included in your plan, at which point you may choose to purchase a Fast LTE (full-speed) allotment included in your plan, at which point you may choose to purchase a Fast LTE (full-speed) allotment included in your plan, at which point you may choose to purchase a Fast LTE (full-speed) all





This is Exhibit "C" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

A Commissioner for taking Affidavits

Karen Michelle Whibley, a Commissioner, etc. Province of Ontario, for Sotos LLP, Barristers & Solicitors. Expires October 19, 2024. Date Published: July 25, 2019
Date Updated: July 25, 2019
Serial Number: N2097-GE
Category: Marketing - Acquisition



Welcome to Freedom's Back-to-School Season!





Another year and another Back-to-School season is upon us.

Last month, the incumbents launched new plans, copying Freedom's long-existing unlimited plans. But despite their efforts, our rate plans remain to be the most affordable plans available in the market. We're still the original Home of the Big Gig, and for this year's Backto-School, Freedom is going even BIGGER!

"Unlimited" Rate Plans

We will adopt the word "Unlimited" on rate plans with 10GB of data or more. So, when customers come to stores asking, "Do you have those Unlimited Plans like Rogers?" or Retail teams can proudly respond with: "Yes we do! And ours are better priced too."

For more details on rate plan suite changes, check out: N2098-GE - Rate Plan Refresh - Introducing Big Gig Unlimited

Amazing Deals on Devices

Our Unlimited PlansINCLUDE A PHONE!

Customers signing up for one of our new Unlimited Rate Plans will have a choice of devices for absolutely zero dollars.

For more details, check out: N2099-GE - Introducing Freedom's Absolute Zero Promo

INTERNAL USE ONLY - This document is intended only for use by employees and partners of Freedom Mobile. Distribution of this document, or portions of this document, to non-Freedom parties may result in disciplinary action and/or termination.

Date Published: July 25, 2019 Date Updated: July 25, 2019 Serial Number: N2097-GE

Category: Marketing - Acquisition





Training & Learning

To ensure our customer-facing teams are ready to position our awesome Back-to-School offers to customers, the following training materials are available effective July 25:

Retail

Training materials are available on Fusion.

To access, follow the path below:

Learner Zone > Discover > Selling our Products & Services community > Freedom Mobile
Back to School 2019

Customer Care

Training materials are available on the Learning Site.

To access, follow the path below:

Find Learning> search for the "Freedom Back to School 2019" course



Customer Messaging

To support our Back-to-School campaign, the following customer messaging will be deployed on July 25:

Update Type	Details
Website Updates	Home page, Special Offers page, and Samsung/Apple
	pages on <u>freedommobile.ca</u> will be updated with new rate
	plans and device offers.
Advertising	In our biggest Back-to-School advertising campaign to
	date, Will Arnett will continue throwing shade at the
	incumbents.
Media Relations	An official media release is available here:
	Freedom Mobile Lowers Monthly Bills With Absolute Zero
	Phone-Included Offers and More Affordable Unlimited Plans
Customer Base Messaging	Our Customer Base Management (CBM) team will be
	deploying multiple customer base communications to
	support our Back-to-School offers.
	For more details, check out: <u>R168-GE - Freedom Mobile's</u>
	<u>Customer Base Initiatives</u>



Merchandising

Merchandising materials for our Back-to-School campaigns will arrive in-stores starting July 25. Store teams are expected to install these items as soon as they arrive:

Arriving on July 25

Surface Signs Window Poster Dealer Poster New Kiosk Poster

INTERNAL USE ONLY - This document is intended only for use by employees and partners of Freedom Mobile. Distribution of this document, or portions of this document, to non-Freedom parties may result in disciplinary action and/or termination.

Date Published: July 25, 2019 Date Updated: July 25, 2019 Serial Number: N2097-GE Category: Marketing - Acquisition



Rates Poster

Freedom Frame Poster Square Kiosk Poster

Backlit poster

New Store Wall Panel

New Concept Kiosk Posters

New Concept Inline- Backlit Riser graphics SmartCircle Campaign (Select locations)

emarence campaign (coloct recalions)		
Arriving after July 25		
All Stores	 Absolute Zero Phone Stickers (will arrive with the following week's replenishment) Uniform Pins Hours of Operation Signs 	
New Concept Inline Stores	 Big Gig Wall Updated Fabric Backlit Poster Note: Install schedule for these items will be communicated to stores directly. 	

There will be no new brochures at this time.

- Stores must discard the current brochures as they are no longer relevant.
- 10GB/50 poster can also be discarded.



References

N2098-GE - Rate Plan Refresh - Introducing Big Gig Unlimited N2099-GE - Introducing Freedom's Absolute Zero Promo



If you have any questions or concerns, contact:

- Retail <u>ChannelExperience@FreedomMobile.ca</u>
- Care <u>CareProcessSupport@FreedomMobile.ca</u>

This is Exhibit "**D**" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

A Commissioner for taking Affidavits

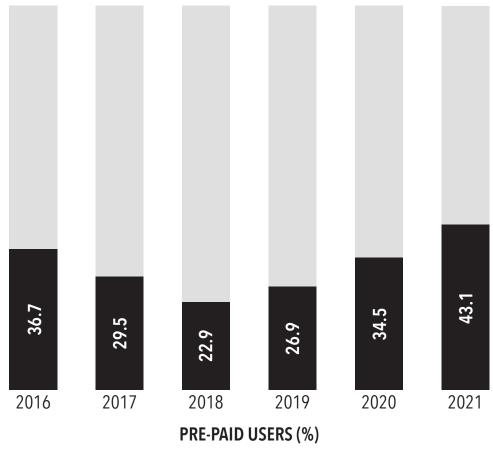
Karen Michelle Whibley, a Commissioner, etc. Province of Ontario, for Sotos LLP, Barristers & Solicitors. Expires October 19, 2024.

Prepaid vs. Postpaid

Freedom mobile catered to the underserved consumer communities

Prepaid

- Poor Credit
- No Credit
- Seniors
- Students
- New Immigrants
- Low Income Families
- Talk Only



This is Exhibit "E" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

A Commissioner for taking Affidavits

Date: 3/21/18 | Source: Sharepoint2013 | File Created Date: 05/24/2017

A Success Attitude

Pride in Freedom Mobile, and belief in the strength and future of the brand

Introduction

It's always an exciting time to be a Retail Specialist at Freedom Mobile: we are not just another wireless company but one that endeavors to truly meet the needs of all our customers. With that being said, we not only offer our customers great service and plans but also a great brand. A brand we can be proud of; one we represent and protect. Our brand should mean something – firstly to us then our customers – and by Retail Specialists having a sense of pride in the brand, it should be no surprise why our customers will as well.

Objective

Explain the Freedom Mobile brand: what it means and how it benefits customers.

How It Works:

Step	Action						
1	The activity leader should begin by asking the Retail Specialist to quickly list						
	some of positive things that they tell customers when it comes to the Freedom						
	Mobile brand.						
	Reponses could include:						
	 Unbeatable value for the money paid for service 						
	 Truly unlimited and affordable wireless services 						
	 No data overage charges 						
	No fixed-term contracts						
	Wide local coverage						
	Constantly growing and expanding						
	Flexible savings options for every customer type						
	 A true change-agent in the wireless market place etc. 						
2	The activity leader will follow-up the previous question by asking the Retail						
	Specialist to list the "four fixes" that make up the Freedom Mobile brand and						
	then summarize how these points benefit our customers.						
	Reponses could include:						
	 Freedom from data overages. 						
	 Freedom from price-gouging. 						

our commitment to sales excellence

- Flat monthly fees.
- Affordable everything.

"Gone are the days when customers get dinged with excessive data overage charges or monthly plans that just gouge people's wallets. At Freedom Mobile, we offer our customers flat monthly rates that are not just affordable to some, but all our customers."

"Essentially, our commitment is to keep our service rates as low and affordable as we can, with no surprises or changes that would hurt the overall customer experience."

"Canadians deserve the freedom to communicate and at Freedom Mobile, we believe everyone should be just that – free! They should be free to communicate and keep in contact with their loved ones without having to worry about high costs or other barriers. No one should feel left behind!"

The activity leader will then ask the Retail Specialist to summarize reasons for why it is important to have pride in the Freedom Mobile brand.

Responses to look for:

- Having pride in the brand shows the customer that we not only believe in what we offer but that we are willing to stand behind our products and services – now and in the future!
- Having pride in the brand shows that we are confident about our offerings and that our customers can trust what we are presenting them will truly be beneficial to them.
- Having pride in the brand can provide our customers comfort whenever they have concerns or hesitations.
- The store leader can then celebrate and reinforce any specific wins Freedom Mobile has achieved in recent times with the learner.

Furthermore, the store leader should gain commitment from the Retail Specialist to incorporate demonstrations of their belief in the Freedom Mobile brand their sale pitch. Discussions about the impact it has on their sales presentations will be done in their next coaching session.

The activity leader will ask the Retail Specialist if they have any remaining questions or concerns and then thank them for their participation.

This is Exhibit "F" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

A Commissioner for taking Affidavits





Message from Alek

FreedomMobile Communications <Communications@freedommobile.ca> To: FreedomMobile Communications <Communications@freedommobile.ca>

Wed, Apr 12, 2017 at 2:39 PM

41

<<This message has been sent to Dealer Principals and Off Shore Care Sites>>

Message from Alek

Communicated: April 12, 2017

Dealer & Off Shore Care Channel

This morning, Freedom Mobile's CEO Alek Krstajic shared that he will be stepping down as CEO of Freedom Mobile. See below for a message from Alek:

"What an amazing journey we've been on together. We've continued to grow our customer base to well over a million customers -- against all odds as underdogs in an industry dominated by the Big Three -- by providing an affordable, high-value alternative service for wireless consumers. We couldn't be happier with the confidence and resources provided by Shaw, and their support to your work has helped our value proposition resonate with Canadians. The future of Freedom Mobile is bright.

I'm honoured to have shared this experience with all of you and it's time for me to proudly pass the baton to my friend and wireless industry veteran, Paul McAleese. I will be retiring at the end of this month.

Paul brings to Freedom over two decades of experience in mobile communications in the U.S., U.K., and Canada. Reporting directly to Shaw's President, Jay Mehr, Paul will continue to apply his experience and expertise to leading Freedom Mobile into the future as a major player in the Canadian wireless industry for years to come.

Over the coming weeks, Paul and the Shaw senior leadership team will take key steps to further integrate Freedom and Shaw as we continue down the path to one converged wireless and wireline network that delivers seamless connectivity for customers.

It's been an honour to work alongside all of you over the past two years and it's your outstanding dedication, creativity and teamwork that have made Freedom Mobile the company it is today. You're ready to take the next step under Paul's leadership as we continue to upgrade our network, further integrate Freedom and Shaw and continue to provide customers with freedom from data overages, freedom from price-gouging, flat monthly fees—affordable everything.

Thank you for your hard work, commitment and friendship—I wish you all the best.

Alek"

Freedom Mobile Communications

Freedom Mobile 207 Queen's Quay West, Suite 710 Toronto, ON M5J 1A7

Email: Communications@FreedomMobile.ca



LIV

This is Exhibit "G" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

A Commissioner for taking Affidavits



New Consumer Rate Plan Suite Coming October 19

Type:NewsID:N1280-GECategory:Product and ServicePublished:October 16, 2017Target Audience:General EmployeeLast Updated:October 16, 2017

KEY DATES Effective Date: Thursday, October 19, 2017

DETAILS

Summary

- Freedom Mobile has always offered great choices for customers; effective **October 19** we are going to continue that tradition, but in a new and **BIG** way.
- We're completely overhauling our rate plans and MyTab structure in a way that introduces more great ways for our customers to:
 - o get more data to access our fast LTE network, and
 - save more on the phones they know and love.
- Building on the success of MyTab Bonus, we are offering more great savings on phones to our customers depending on the plan they choose. This means more \$0 phones!
- See the sections below for a high level summary of the changes, then review the following resources for more details:
 - For a full breakdown of our 10 new rate plans' specifications/inclusions, review:
 - R042-GE Standard Consumer Rate Plan Offering
 - For updated MyTab program policy and eligibility, review:
 - Retail: S139-RS MyTab and MyTab Boost Program Retail
 - Care: S271-L1 MyTab Program Including MyTab Bonus and Boost
 - o For MyTab eligibility groups, review the second tab in:
 - R032-GE Rate Plan and MyTab Matrix

RATE PLAN CHANGES

We're building value in Freedom with 10 new, affordable, feature rich plans:

Plan Type	Plan Name	Details		
	Big Gig 50 *** Best Value ***	Freedom Mobile's newest plans! Access our fast LTE network with more gigabytes than ever before – all at		
Big Gig	Big Gig 70	affordable rates that let you stream, snap, surf, post, tweet, and upload without worrying about data		
	Big Gig 90	overage charges. Ideal plans for someone prioritizing data and savings.		
	Everywhere Canada 50			
Big Gig +	Everywhere Canada 60 ***Best Value***	Get the Big Gig benefit and the added plus of Everywhere Canada talk, text & data. Ideal plans for		
Everywhere	Everywhere Canada 75	someone wanting to stay connected in Home & Away Canada.		
	Everywhere Canada 100			
	Home 25	Entry-level plans with good value and features that		
Home Only	Home 30	work within the Freedom Mobile Home network. Ideal plans for someone looking for Home only use plus		
	Home 40 ***Best Value***	good features.		

For a full breakdown of each plan, review R042-GE - Standard Consumer Rate Plan Offering.

Grandfathered Plans

As part of this rate plan suite update, the following plans are grandfathered effective October 19: Talk and Text 25, Smartphone 30, Smartphone 40 (2GB and 4GB), Everywhere 49 6GB, and Everywhere 59 8GB.

MYTAB CHANGES

- Starting October 19, we are opening up more ways for customers to pay for their phones over time.
- Depending on the customer's phone and rate plan selection, they may be eligible for a MyTab Bonus (up front phone subsidy) for \$0/month, no MyTab Boost required.
- Plus, by introducing two new MyTab Boost options (\$40 & \$50 tiers), MyTab now includes more options to pay off a portion of the phone cost (between \$120 and \$1,200) over 24 months instead of up front.
 - That's a \$360 increase enabling:
 - 1. More customers to spread the cost of more expensive phones over time
 - 2. Stores to close more sales on the phones our customers know and love.

• Important:

MyTab Tier

MyTab Boost tier availability will now vary depending on the rate plan selected (i.e. higher Boost tiers are only available on higher priced rate plans), and

MyTab Bonus will vary based on both the rate plan and phone selected.

(cost per month)	\$ U	\$ 5	\$10	\$15	\$ ∠U	\$ 25	\$35	\$40	\$50
MyTab Amount (up front phone discount)	Varies based on phone	Bonus + \$120				Bonus + \$600	Bonus + \$840		
	Y	$\overline{\mathbf{v}}$	+	+	+	+	Y	\	+
Rate Plan				MyTa	ab Eligil	oility			
Home 25					N/A				
Home 30	✓	✓	✓	✓	✓	N/A	N/A	N/A	N/A
Home 40	✓	✓	\	✓	\	\	N/A	N/A	N/A
Everywhere Canada 50	✓	✓	\	\	\	\	\	N/A	N/A
Everywhere Canada 60	✓	✓	✓	✓	✓	✓	✓	✓	√
Everywhere Canada 75	✓	✓	\	\	\	\	\	\	√
Everywhere Canada 100	✓	✓	✓	✓	✓	✓	✓	✓	√
Big Gig 50	✓	✓	√	✓	✓	✓	✓	N/A	N/A
Big Gig 70	✓	✓	✓	✓	✓	✓	✓	✓	√
Big Gig 90	✓	✓	√	√	✓	✓	✓	✓	√

Based on the MyTab tier option the customer selects, they can get their phone for a lower cost or even \$0 up front! Customers will continue to pay off their phone over a 24 month period.

MyTab Fee for Rate Plan Downgrades

Available MyTab amounts are directly associated with the rate plan a customer subscribes to. Changes to a customer's rate plan may in turn cause a change to their MyTab Bonus and/or Boost eligibility. The chart below outlines the potential implications in a rate plan change scenario:

If a customer	Then		
Upgrades their plan	No charge will apply		
Downgrades their plan	The customer will; 1. default to the next highest MyTab tier that they are eligible for (if applicable) 2. be billed the difference between their current MyTab balance and 24x their new monthly Boost fee. i.e.: a. A customer who activates on Big Gig 70 with a \$40 Boost, who then downgrades to Big Gig 50 will • default to a \$35 Boost, • be charged a MyTab fee: [their current MyTab balance] – [\$840] b. A customer who activates on Big Gig 70 with a \$40 Boost, who then downgrades to Home 40 will • default to \$25 Boost, • be charged a MyTab fee: [their current MyTab balance] – [\$600] Note: Singl.eView, CAP and My Account will display the		
	amount due prior to completing the rate plan change.		
Changes their rate plan from a MyTab eligible plan to a non-MyTab eligible plan	The customer will be billed their full remaining MyTab balance		

GRANDFATHERED PLAN MYTAB CHANGES

- We are also simplifying MyTab for grandfathered rate plans, and making MyTab Boost available for more customers.
- This means, beginning October 19, it will be easier to
 - identify the MyTab that an existing customer qualifies for if they remain on a grandfathered rate plan, and
 - o compare existing MyTab with that available with one of the new rate plans
- The table below shows how to determine which grandfathered plans are eligible for MyTab Bonus and MyTab Boost as of October 19:

	Grandfathered Rate Plan MRC			
	\$0-\$25 \$26-\$35 \$36+			
MyTab Bonus Eligibility	\$0	\$0	\$100	
MyTab Boost Eligibility	No	Yes	Yes	

Existing MyTab balances are not affected.

Note: Refer to the second tab of *R032-GE – Rate Plan Matrix* to see the new MyTab structure as of October 19.

TRAINING

eLearning (All Employees)

- The following new eLearning course has been created to help all customer facing employees (Care and Retail) understand how the upcoming rate plan and MyTab changes offer value to our customers.
- All employees must complete the course below **before** the changes take effect on **October 19:**

Step	Action				
1	Login to The Learning Site: https://learn.freedommobile.ca/				
2	From the top banner, click 'Find Learning' and select 'Courses'				
3	Search for and select 'Our Rate Plans & MyTab'				
4	Scroll down to find the eLearning course titled 'Our MyTab Program and How it Serves our Customers'				
	Note: Training will take approximately 40 minutes to complete				

Infographic

- Also available on The Learning Site alongside the eLearning module is a new Apps and Data Usage Infographic for employees to reference for at-a-glance support. Follow the directions above to access this tool on The Learning Site.
- Note: this tool is intended for internal use only and must not be printed or shown to customers.

Store Team Meeting (Retail Only)

Stores are expected to conduct a team meeting at the store level with all staff between Thursday, October 19 and Sunday, October 22 to discuss the new rate plan suite and MyTab changes. (Store leaders will receive the Team Meeting Package in a separate communication this week).

Care Huddles (Care Only)

Team Huddle Agendas will be provided to Customer Care Leaders at each Site on October 16. All Customer Care Agents are expected to complete a Team Huddle between October 16 and October 22. The Team Huddles will reiterate the high-level changes, and provide an opportunity for questions and discussion surrounding the changes with all Customer Care teams.

MERCHANDISING

- New Price Cards will be available on RMS by end of day October 18 for printing and merchandising in store on October 19.
- All stores will receive new Rate Plan Brochures and Rate Plan Posters to support the launch of our new rate plan suite.
 - Shipment dates for these materials will be shared at a later date.
 - In the interim, stores must remove all old Rate Plan Brochures and Rate Plan Posters from the sales floor for disposal before store opening on October 19.

DEALER SOC CODES Dealer Principals must update their POS with the new Rate Plans' SOC Codes prior to opening on October 19 to ensure activations function in Carrier Integration.

Rate Plan Name	Pay Before	Pay After
Home 25	2000344 1000387	2000384 1000387
Home 30	2000344 1000388	2000384 1000388
Home 40	2000344 1000389	2000384 1000389
Everywhere Canada 50	2000344 1000390	2000384 1000390
Everywhere Canada 60	2000344 1000391	2000384 1000391
Everywhere Canada 75	2000344 1000392	2000384 1000392
Everywhere Canada 100	2000344 1000393	2000384 1000393
Big Gig 50	2000344 1000394	2000384 1000394
Big Gig 70	2000344 1000395	2000384 1000395
Big Gig 90	2000344 1000396	2000384 1000396

MyTab SOC Codes

The SOC code for the new \$40 and \$50 MyTab tier option is as follows:

MyTab Tier	SOC Code
\$40	2002997 1000367
\$50	2002997 1000397

REFERENCE

Rate Plans

The following documents reflect the new Rate Plan Line-up as of October 19:

- R042-GE Standard Consumer Rate Plan Offering
- R032-GE Rate Plan and MyTab Matrix

MyTab

The following SOPs have been updated to reflect the MyTab Changes effective October 19:

- Retail: S139-RS MyTab Program Retail
- Care: <u>S271-L1 MyTab Program Including MyTab Bonus and Boost</u>

Corporate Stores:

The following document has been updated with the new Corporate Retail commission structure for our 10 new rate plans as well as an increase in commission earned for MyTab upgrades:

R057-CE - Retail Commission Structure - 2017

CONTACT

If you have any questions or concerns, contact:

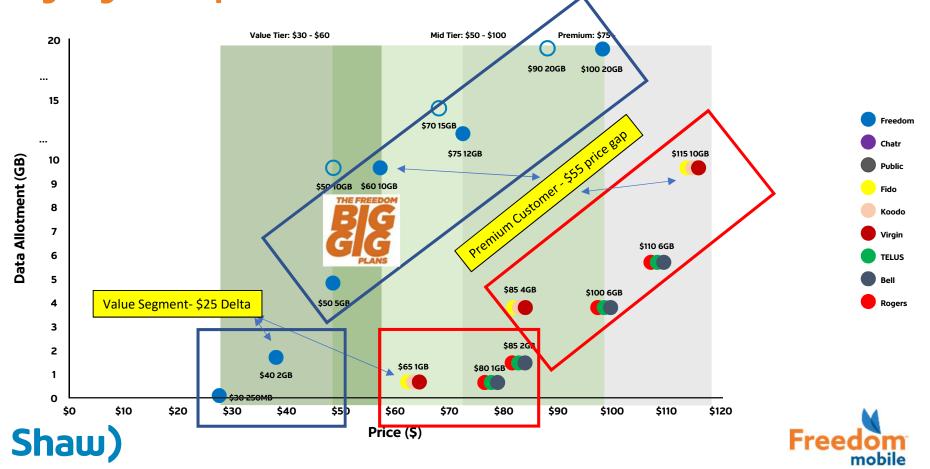
- Retail ChannelSupport@FreedomMobile.ca
- Care CareProcessSupport@FreedomMobile.ca

This is Exhibit "H" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

A Commissioner for taking Affidavits

Big Gig - Steep Discounts Establish Freedom as Value Leader



Plans effective November 1st, 2017. Includes BYOD data, plus text (and talk).

This is Exhibit "I" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley
A Commissioner for taking Affidavits

Annexure 2

FreedomMobile Communications < Communications @freedommobile.ca>

Aug 1, 2018, 11:01 AM

to FreedomMobile

<<This message has been sent on behalf of Paul McAleese, President, Wireless >>

Hi Team,

We're so excited to share our bold new advertising campaign with you today.

This campaign challenges the conventions of Canadian wireless industry by taking aim at the practices that charge wireless users astronomical fees when they go over their data limit. For context, data overage fees in Canada have recently hit new levels, with prices now reaching as much as \$100/GB.

With this campaign, we're building on the tremendous momentum from our data-rich Big Gig plans, and now targeting the problems consumers face when exceeding their data limits. We have an opportunity be the *only* brand offering the value everyone deserves and that's exactly what we want to demonstrate with this new campaign.

Equally as exciting is our partnership with Will Arnett, Emmy-nominated Canadian actor, who will be acting as our spokesperson and champion for the average wireless consumer in Canada. Will's self-assured style, irreverence and impeccable sense of comedic timing makes him a perfect fit as our hero character. We expect his voice and character in this campaign will hit home with Canadians.

Check out his debut campaign < here>.

A huge shout out to the team who made this possible – we're so lucky to work with such incredible folks across the country. Thank you for all you do.

Here's to a great month, and a successful campaign.

Until next time,

Paul

Freedom Mobile Communications

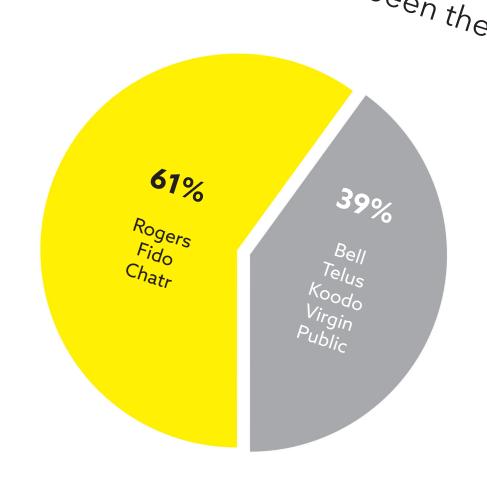
Freedom Mobile 207 Queen's Quay West, Suite 710 Toronto, ON M5J 1A7

Email: Communications@FreedomMobile.ca

This is Exhibit "J" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

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ASSOCIATION OF F-BRANDED WIRELESS DEALERS

This is Exhibit "**K**" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley
ACommissioner for taking Affidavits

FREEDOM MOBILE Competitor Comparison



We continue to drive value to Canadians with our BIG GIG Unlimited data plans.

BIG GIG UNLIMITED DATA PLANS

On select BIG GIG Unlimited data plans and select devices, customers have the option of getting a device on ABSOLUTE ZERO.



Our customers now have a range of phones they can get for AB\$OLUTELY ZERO.

\$0 Upfront. \$0 Extra/Month. \$0 After 2 Years...and the phone is yours to keep!

Some of the great devices available include:



iPhone 11



iPhone XR Samsung



Samsung Galaxy S9



Samsung Galaxy A70



LG G8 ThinQ



Google Pixel 3





FREEDOM MOBILE

HOW THE COMPETITION POSITIONS IT...

O ROGERS

Device Financing: FINANCING

- Monthly payments on device amount.
- Taxes are payable with your monthly device payments over 24 months.

Reduce device cost: UPFRONT EDGE

- Taxes paid monthly over 24 months
- "Return your phone in good working condition to a Rogers store in the final month of your 2-year term or keep your phone and the <u>Upfront Edge™ amount</u> will be charged to your next bill.



Device Financing: EASY PAYMENT

- Monthly payments on device amount.
- Taxes paid up-front on full device amount.

Reduce device cost: BRING-IT-BACK?

- Taxes paid <u>up-front</u> on the amount prior to the Bring-It-Back program amount being removed.
- Return your smartphone in good working condition at the end of your 2year term or keep it and pay back the Device Return Option deferral amount you saved.

Bell

Device Financing: SMART PAY

- Monthly payments on device amount.
- Taxes are payable with your monthly device payments over 24 months.

Reduce device cost: DEVICE RETURN OPTION

- Taxes paid monthly over 24 months
- Return your smartphone in good working condition at the end of your 2year term or keep it and pay back the Device Return Option deferral amount you saved, including tax.

fido ♠

Device Financing: THE FIDO PAYMENT PROGRAM

- Full cost of the device is spread out over 24 equal monthly payments.
- Taxes on full device cost are paid over 24 equal monthly payments.
- Some high-end devices will require a deposit up-front plus applicable taxes.
- The device is yours after 24 months.

Reduce device cost:

Trade-in

 You may trade-in an eligible device to reduce applicable up-front costs.

Freedom mobile



Freedom is the only carrier offering a true \$0 price point on eligible plans & devices!

OUR OFFER...

\$0 Upfront
\$0 Monthly MyTab Charge
\$0 at the end of 24 months
\$0 Tax

The <u>customer gets to keep</u> their \$0 phone too!



FREEDOM MOBILE

iPhone 11 (64 GB)

Pricing accurate as of 02/06/2020 and subject to change. For most accurate pricing keep up-to-date on each carrier's respective website.

*taxes included, based on 13% ON HST and will vary by province.

O ROGERS

MSRP: \$1005

UPFRONT EDGE™

- \$0* down on a 24-month term
- Plus \$34.12 monthly for 24 months with Upfront Edge**.

OR

- \$0 down on a 2-year financing
- Plus \$47.31 monthly for 24 months with Financing.

**Phone must be returned during Month 24 or \$280 + tax will be charged to the customer's account for the discounted Upfront Edge amount.

Bell

SMARTPAY

- \$0 down on a 24-month term.
- Plus \$47.33 monthly for 24 months

OR

- 0\$ down for 24 months
- Plus \$35.66 for 24 months on Bell SmartPay + Device Return**.

**Phone must be returned during Month 24 or \$280 + tax will be charged to the customer's account for Bell SmartPay + Device Return.

TELUS

MSRP: \$1003

EASY PAYMENT®

- \$0 down on a 24-month term with \$130.39 for taxes due upfront.
- Plus \$41.79 per month for 24 months.

OR

- \$0 down with \$130.39 for taxes due upfront.
- Plus \$32.31 for 24 months with Bring-It-Back™**.
- **Phone must be returned during Month 24 or \$230 + tax will be charged to the customer's account for the Bring-It-BackTM discounted amount.



MSRP: \$1005

THE FIDO PAYMENT PROGRAM

- \$231.65 down
- Plus \$37.73 per month for 24 months



MSRP: \$979

MSRP: \$1005

\$0 device (Up-front cost for the phone)

\$0 (taxes* for the phone)

\$0 (\$0/month × 24 months)

AND OUR CUSTOMER GETS TO KEEP THE PHONE TOO!

This is Exhibit "L" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley
A Commissioner for taking Affidavits

Given the choice, the more vulnerable segment of the wireless Locations

consumers rely heavily on Freedom Mobile.

Store locations with Rogers/Fido/Chatr within 1 KM

> 30% Rogers/Fido/Chatr location more than 1 KM away

ASSOCIATION OF F-BRANDED WIRELESS DEALERS

This is Exhibit "M" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley
A Commissioner for taking Affidavits



Your Q1 2021 Sales Target

FreedomMobile Communications <Communications@freedommobile.ca>
To: "sudeep@connexions.ws" <sudeep@connexions.ws>

Wed, Dec 23, 2020 at 3:02 PM



Connexions Q1 2021 Sales Targets





Hi, Sudeep:

Your Q1 2021 Sales Target is now available through this link: https://sjrb.sharepoint.com/: x:/t/ChannelCommunications/EZdvS3ms5TNBohMhvTmnagoBaonufiWh6w-tSFMnPxw63Q?e=s7Fbx4.

IMPORTANT:

Moving forward, your sales targets will be sent via a Sharepoint link, instead of being attached to an email, to provide more security to your data. You will be asked to enter a verification code when you click on the link. This code will be sent to your email address on file. Make sure to check your Spam Folder for the email. If you are having trouble finding the code or accessing your report, please reach out to your DBM.

For your convenience, the targets include a monthly breakdown of Prepaid and Postpaid activations.

Bonus Payment Schedule

- Overall quota bonus will be paid out as follows:
 - Postpaid paid with December commissions in January
 - Prepaid paid in March to allow 60 full days to collect second MRC
- For Dealer Quarterly Volume Bonus, refer to your Freedom Mobile Dealer Agreement Schedule "A" for full program details.

Q1 2021 Bonus Criteria

Bonus Type Details

Customer Experience Bonus

The following metrics will be used to establish a stack rank of customer experience based on your store performance:

Measure	Definition	Weighting
Fusion Participation Frequency %	Average number of Fusion login per month for the Dealership divided by the number of days in a month	40%
Customer Sentiment Survey	Of all responses to the survey, the percent of respondents with a response of "4" or "5" on a 5-point scale.	40%
Valid Email Collection	Valid emails (in the determination of Freedom) vs. total activations.	20%

Qualifications:

- A Dealer must be in operation the entire quarter to qualify.
- A Dealer must pass the SVR (>85%) in order to qualify.

Payment:

Dealer Percentile	Payment per qualifying activation
Top 25 th	\$15
Top 75 th up to the top 25 th	\$5
Bottom 25 th	\$0

Policy

- Dealer sales targets are set solely at the discretion of Freedom Mobile.
- Dealers are paid quarterly bonus on their entire Dealer activation results, and not per store.

Contact

For any questions or concerns, reach out to:

- your Dealer Business Manager
- ChannelReporting@FreedomMobile.ca

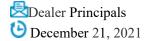


Q1 2022 Dealer Targets - Connexions

FreedomMobile Communications < Communications@freedommobile.ca> Tue, Dec 21, 2021 at 10:18 AM To: FreedomMobile Communications < Communications@freedommobile.ca>, "sudeep@connexions.ws" < sudeep@connexions.ws>



Q1 2022 Dealer Targets: Connexions



Hi Sudeep,

Your Q1 2022 Sales Targets are now available. For your convenience, the targets include a monthly breakdown of Prepaid and Postpaid activations.

Bonus Payment Schedule

- Overall quota bonus will be paid out as follows:
 - Postpaid paid with March commissions in April
 - Prepaid paid in June to allow 60 full days to collect second MRC
- For Dealer Quarterly Volume Bonus, refer to your Freedom Mobile Dealer Agreement Schedule "A" for full program details.

Bonus Criteria

Bonus Type		Details	
Customer Experience Bonus The following metrics will be experience based on your storms.		rics will be used to establish a stack rank of on your store performance:	customer
Donus	Measure	Definition	Weighting
	Fusion Participation	Average number of Fusion login per month for the Dealership divided by the	40%

Frequency %	number of days in a month	
Customer Sentiment Survey	Of all responses to the survey, the percent of respondents with a response of "4" or "5" on a 5-point scale.	40%
Valid Email Collection	Valid emails (in the determination of Freedom) vs. total activations.	20%

Qualifications:

- A Dealer must be in operation the entire quarter to qualify.
- A Dealer must pass the SVR (>85%) in order to qualify.
 - Temporarily suspended due to the pandemic

Payment:

Dealer Percentile	Payment per qualifying activation						
Top 25 th	\$15						
Top 75 th up to the top 25 th	\$5						
Bottom 25 th	\$0						

Policy

- Dealer sales targets are set solely at the discretion of Freedom Mobile.
- Dealers are paid quarterly bonus on their entire Dealer activation results, and not per store.

Contact

For any questions or concerns, reach out to:

- your Dealer Business Manager
- ChannelReporting@FreedomMobile.ca

Freedom Mobile Channel Communications

Distributed to Dealer Business Managers & Dealer Principals



2021 DEALER Q1 QUOTA

January			Fo	ebruary		March			Q1			
Prepaid	Postpaid	Total										

Dealer:	Connexions	Total
---------	------------	-------

					J	anuary		February			March			Q1		
hannel Cod	GL Code	Dealer Name	Common Name	DBM	Prepaid	Postpaid	Total	Prepaid	Postpaid	Total	Prepaid	Postpaid	Total	Prepaid	Postpaid	Total
WD209023	2090	Connexions	Woodroffe	Jeremy Biden							_					
WD209025	2090	Connexions	Market Square Shopping	Jeremy Biden												
WD209020	2090	Connexions	Lindsay Square	Jeremy Biden												
WD209022	2090	Connexions	Hogs Back Plaza	Jeremy Biden												
WD209024	2090	Connexions	Clyde	Jeremy Biden												
WD209021	2090	Connexions	Bank Street	Jeremy Biden												
WD209019	2090	Connexions	79D King Street W	Jeremy Biden												
WD209006	2090	Connexions	Rowntree Plaza	Jeremy Biden												
WD209010	2090	Connexions	Peterboro Mews	Jeremy Biden												
WD209002	2090	Connexions	Parkdale	Jeremy Biden												
WD209012	2090	Connexions	Lansdowne Place	Jeremy Biden												
WD209017	2090	Connexions	Kipling Queensway Mall	Jeremy Biden												
WD209013	2090	Connexions	Kingsway Village Shopping	Jeremy Biden												
WD209004	2090	Connexions	Islington Village	Jeremy Biden												
WD209014	2090	Connexions	Clarington Centre	Jeremy Biden												
WD209007	2090	Connexions	Bloor West Village	Jeremy Biden												
WD209008	2090	Connexions	Albion Centre	Jeremy Biden												
WD209018	2090	Connexions	862 Eglinton Avenue West	Jeremy Biden												
WD209016	2090	Connexions	Broadview and Queen	Jeremy Biden												

This is Exhibit "N" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley
A Commissioner for taking Affidavits

Freedom Dealer's Year Over Year Q1 Quota Dropped (2022 vs 2021)

Dealers	# of Locations	Prepaid Drop	Postpaid Drop
Dealer - 1	19	33%	40%
Dealer - 2	11	12%	31%
Dealer - 3	16	38%	28%
Dealer - 4	3	30%	52%
Dealer - 5	2	22%	70%
Dealer - 6	15	25%	41%
Dealer - 7	7	23%	44%
Dealer - 8	5	18%	45%
Dealer - 9	7	37%	66%
Dealer - 10	6	28%	53%
Dealer - 11	13	25%	46%

Average Chart:



This is Exhibit "O" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February 2022

Karen Whibley
A Commissioner for taking Affidavits



MEMO

To: Corporate and Dealer 5G stores only

Date: April 8th, 2021

Subject: Window poster for April 8th 5G launch

You will find 2 window posters enclosed. One will be placed in the window on April 8th and the other will be updated at a later date. Always check RMS for the correct planogram placement of merchandise. Please ensure that the below <u>"5G it's Happening"</u> poster is displayed in the store window on April 8th as per your planogram.

Place the remaining iPhone 12 5G poster in a safe place in your store until further notice.

[Window Poster for April 8th]



This is Exhibit "P" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley

A Commissioner for taking Affidavits

Date Published: April 21, 2021 Date Updated: April 21, 2021 Serial Number: N2871-GE

Category: News



5G Launch Update

We have put a pause on our launch of 5G.

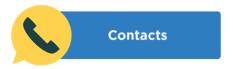
Details

We have made the decision to indefinitely pause the launch of our 5G network. While we know that this news is disappointing, this is the right decision for our customers and company at this time.

We operate in an extremely competitive marketplace. To launch our initial phase 5G service, we require a clear path forward for the later phases, including spectrum and infrastructure. At this time, this path is not certain. Our decision today stands by our commitment of transparency with our teams and customers of what products and services we can offer now and in the near term.

Merchandising

All stores will need to RMA back all merchandising material delivered on April 7. Please print RMA number #RMAMERCH0421 along with your channel code on a piece of paper and include it in with the shipment for easy identification upon receipt at the warehouse.



For any questions or concerns, reach out to:

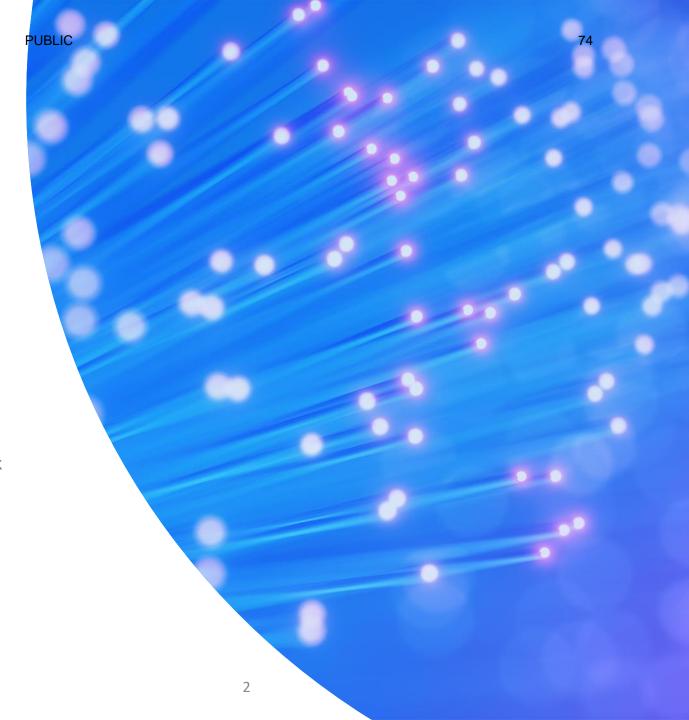
- Retail: GotoMarket@freedommobile.ca
- Care: CareProcessSupport@freedommobile.ca

This is Exhibit "Q" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February 2022

Karen Whibley
A Commissioner for taking Affidavits

Option A – Turnkey Interior Cosmetic Upgrade

- Work timeline:
 - 8 to 12 days.
- SoW includes removal of existing fixtures, painting walls, install vinyl flooring, update lighting, install new fixtures/merch displays, other works TBD per site ie relocation of sprinklers.
 - Excludes HVAC, façade, external signage, removing/building walls, upgrades/repairs to back of house and washroom.
- Dealer cost will not exceed \$50K
- No permit





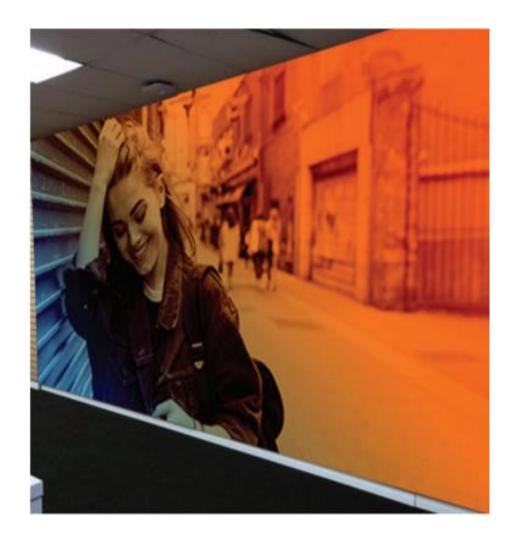
Option B – Phased Reno

P1 – Fixture Refresh + Vinyl Wrap P2 – Interior Upgrade

Work timeline:

- Phase 1 3 to 5 days.
- Phase 2 7 to 12 days
- SoW:
 - Phase 1 remove old fixtures, install Freedom branded interior vinyl wrap, install new fixtures and merch displays
 - Phase 2 remove wrap, paint walls, install flooring, update lighting, other works TBD per site i.e., relocation of sprinklers.
 - Excludes HVAC, façade, external signage, removing/building walls, upgrades/repairs to back of house and washroom.
 - No permit
- Dealer costs:
 - Phase 1 \$12K -\$15K site dependent
 - Phase 2 \$25 \$35K site dependent
 - Dealer cost will not exceed \$50K in this phased approach.

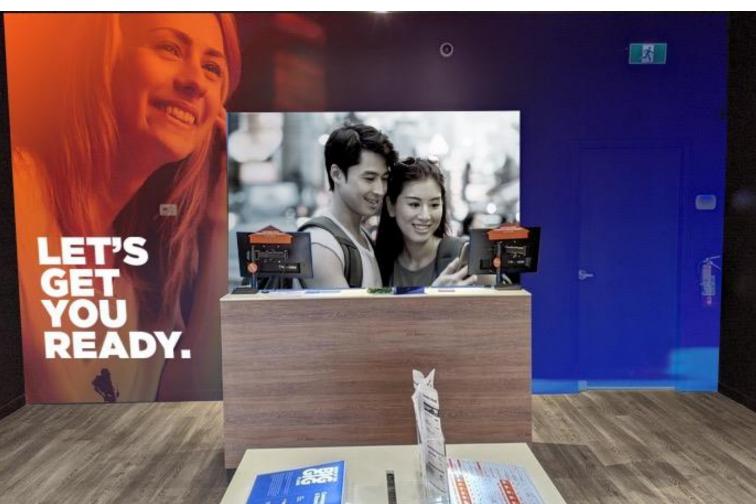






Sample graphic for demo purposes only.
Flooring/lighting not included in Option B Phase I





Sample graphic for demo purposes only. Flooring/lighting not included in Option B Phase I

Cost Comparison – Forecast Only

Store Name - 500 Sq Ft Address Line 1								
Address Line 1 Address Line 2								
	C	OPTION A		OPTION	PTION B		ADD ON*	
Сарех		edom Build rnkey"	Fix	ASE I - cture + ames + Vinyl	PHA Inter			TERIOR SNAGE
Fxtures and frames (gross up)	\$	30,000.00	\$	30,000.00	\$	-	\$	-
Fixture installation	\$	10,000.00	\$	8,500.00	\$	-	\$	-
Get Wrapped Vinyl graphics	\$	-	\$	9,200.00	\$	-	\$	-
Exterior signage	\$	-	\$	-	\$	-	\$	10,000.00
Freedom CAPEX	\$	40,000.00	\$	47,700.00	\$	-	\$	10,000.00
Opex								
Opex Leasehold improvements - Sales Area only	\$	40,005.56	\$	13,500.00	\$27,	000.00	\$	-
	\$ \$	40,005.56 40,005.56	\$ \$	13,500.00 13,500.00		000.00	\$ \$	- -
Leasehold improvements - Sales Area only	<u> </u>	•		·				-
Leasehold improvements - Sales Area only	<u> </u>	•		·	\$27,			10,000.00
Leasehold improvements - Sales Area only Freedom OPEX	\$	40,005.56	\$	13,500.00	\$27,	00.00	\$	10,000.00
Leasehold improvements - Sales Area only Freedom OPEX Total Project Cost	\$	40,005.56 80,005.56	\$	13,500.00	\$27, \$27,	000.00	\$	

Dealer Checklist of Responsibilities – All Programs

Item #	Pre-Construction:	Key Stakeholders	Completion/Effective Date
	All dealer owned TVs/Digital, audio speakers and equipment disconnected and removed from fixtures. Ceiling equipment leave as-is	Dealer Principal	Day prior to construction start
	Physical security systems (alarms, cameras) disconnected, removed from sales floor Ceiling equipment leave as-is	Dealer Principal	Day prior to construction start
	Safes on sales floor empty and unlocked	Dealer Principal	Day prior to construction start
	POS terminals/IT equipment/printers disconnected and removed from sales floor	Dealer Principal	Day prior to construction start
	Merchandise and product removed from sales floor secured in back of house safes or off-site	Dealer Principal	Day prior to construction start
	Personal/misc items removed/purged from sales floor prior to construction start	Dealer Principal	Day prior to construction start
	Access to back of house/electrical panels during entire build	Dealer Principal	Day prior to construction start
	Post-Construction:		
	Internet and phone services reconnected	Dealer Principal	Post Handover
	All dealer owned TVs /Digital, audio speakers and equipment installed and reconnected	Dealer Principal	Post Handover
	Engage Stingray to activate screens and enable live content for screens installed in millwork	Dealer Principal	Post internet re- installation
	Physical security systems (alarms, cameras) installed and reconnected	Dealer Principal	Post Handover
	POS terminals /IT equipment/printers installed and reconnected	Dealer Principal	Post Handover
	Merchandise items installed as per RMS planogram and product put back on display and/or re-secured in safes	Dealer Principal	Post Handover

This is Exhibit "R" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley
A Commissioner for taking Affidavits

Karen Michelle Whibley, a Commissioner, etc. Province of Ontario, for Sotos LLP, Barristers & Solicitors. Expires October 19, 2024.

Sudeep Verma <sudeep@connexions.ws>



Store renovation(s)

Sudeep Verma <sudeep@connexions.ws>

Wed, May 12, 2021 at 11:05 AM

To: "Jeremy Biden (Freedom Mobile)" < JBiden@freedommobile.ca>

Cc: Vidhi Mehta <vidhi@connexions.ws>, Anggza Matharoo <anggzarahi@connexions.ws>

Bcc: Sudeep Verma <sudeep@connexions.ws>

Good Morning Sir,

With reference to your text regarding a cheaper option for store renovation(s) we would definitely be interested in knowing more about it.

However, to make an informed decision we need the following information alongside;

- 1. What is the current policy on store lease renewals? On numerous occasions and calls (post Rogers/Shaw merger) we have been told to go month to month or 1 year.
- 2. Considering the above scenario how would the ROI on this store upgrade work out?
- 3. If the Freedom brand ceases to exist post merger what would happen to this cost?

Also, we are reaching out to our dealer association's legal counsel for further guidance.

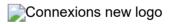
Thanks.

Sudeep Verma

Connexions Telecom Ltd. 1123 Albion Road, Toronto ON M9V 1A9

Office: (416) 741-9555 **Cell:** (647) 231-3514

Email: sudeep@connexions.ws





This is Exhibit "S" referred to in the Affidavit of Sudeep Verma sworn remotely this 24th day of February, 2022

Karen Whibley
A Commissioner for taking Affidavits

Karen Michelle Whibley, a Commissioner, etc. Province of Ontario, for Sotos LLP, Barristers & Solicitors. Expires October 19, 2024.

