

IN THE MATTER OF THE PROPOSAL OF
FOODORA INC.
OF THE CITY OF TORONTO
IN THE PROVINCE OF ONTARIO

NOTICE OF INTENTION TO MAKE A PROPOSAL
FREQUENTLY ASKED QUESTIONS

APRIL 27, 2020

To the Creditors of **Foodora Inc.** (“**Foodora**” or the “**Company**”)

Be advised that on April 27, 2020 the Company filed a Notice of Intention to Make a Proposal (the “**NOI**”) pursuant to the *Bankruptcy and Insolvency Act* (the “**Act**”). Foodora intends to continue to operate until 11:59PM on May 11, 2020 which will be the last day of services. Grant Thornton Limited was named as the Licensed Insolvency Trustee under the NOI (“**Grant Thornton**” or the “**Trustee**”).

Below is a list of Frequently Asked Questions that outline general questions and concerns regarding Grant Thornton’s role.

1. What is the role of Grant Thornton?

Pursuant to section 50.4(1) of the Act, the Company is required to request a licensed insolvency trustee to assist in the filing of NOI. Pursuant to section 50.4(2) of the Act, Grant Thornton will be responsible for, amongst other things, reviewing Company prepared statement of cash flows, reporting on the reasonableness of the Company’s cash flow and commenting on the Company’s proposal to its’ creditors (the “**Proposal**”).

2. When does Grant Thornton and the Company intend on submitting a Proposal to the creditors?

Pursuant to the Act, the Company must submit a Proposal within 30 days. However, extensions may be granted by the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) under certain circumstances.

3. I received a notice from Grant Thornton. What is the purpose of this?

The notice is to inform you of Foodora's NOI filing and that based on the Company's books and records, you may be a creditor of the Company at the time of the NOI. The contents of the notice includes the following:

1. Notice of Intention to Make a Proposal (Form 33) (the "NOI Form");
2. List of Creditors with potential claims over \$250;
3. Certificate of Filing of a Notice of Intention to Make a Proposal (subsection 50.4(1); and,
4. Consent of Grant Thornton Limited to act as trustee.

4. My name and claim amount is missing on the NOI form?

Any creditor with a claim under \$250 may still have their claim reflected in the Company's records, however, for the purpose of the NOI mailing, only creditors with claims greater than \$250 are shown.

5. Why are employees shown as one-line item on the NOI form?

This is because we take steps to protect the confidentiality of employees' personal contact information. However, all employees reflected in the Company's records will receive this notice.

6. The amount listed as owing to me on the NOI Form 33 is inaccurate, what should I do?

The amount listed is based on the Company's books and records, but it will not determine the basis of any claim you are entitled to assert or ultimate distribution you may receive. Once the Proposal is filed, if the Company's records continue to reflect you having a claim, the Trustee will forward you a Proof of Claim form wherein you will be asked to prove the amount you believe is owed to you and provide supporting documentation for your claim. Subject to the Trustee's review and acceptance of the documentation you provide in support of your claim amount, the Trustee will use that figure as the basis for a future distribution.

7. I want to commence an action now as I am owed money from the Company?

Pursuant to section 69 (1) of the Act, actions by creditors for the recovery of a claim arising prior to and after the NOI filing are stayed.

8. How much will be my distribution and when can I expect payment?

The Trustee will be working with the Company over the next 30 days (unless that period is extended by the Court) to compile a plan for creditors. Pursuant to the filing of the Proposal after the 30-day period (subject to extensions) the Trustee will hold a meeting with the creditors to vote on the Proposal. Specifics of the meeting of creditors and the voting procedures will be shared

with creditors once the Company formulates its Proposal. Should the Proposal be accepted by the creditors, the Trustee will seek approval from the Court. Subsequent to the Court's approval, the Trustee will make a distribution to the creditors pursuant to the terms of the Proposal.

9. What if the Proposal is not accepted?

If the Proposal is not accepted, Grant Thornton will be appointed as bankruptcy trustee and a distribution, if any, will be based on the assets available for distribution.

10. I believe I am a creditor but did not receive any documentation from Grant Thornton?

In compiling the list of creditors for the NOI the Trustee used information that was based on the Company's best knowledge per their books and records. Should you believe you have an amount owing by Foodora please email: Foodora@ca.gt.com and a representative from Grant Thornton will obtain the pertinent information from you.

11. Will restaurants, employees and contractor riders get paid outstanding amounts owed before the NOI filing or services provided after the filing?

Our understanding from the Company is that all employee, contractor rider and restaurant payments will be made by the Company according to the regular payment schedule. The Proposal is intended to provide compensation for termination claims of employees and restaurants. Please refer to the Frequently Asked Questions drafted by the Company for further information (this can be accessed on the Trustee's case website at: www.GrantThornton.ca/Foodora).

12. I am an employee of Foodora and have specific questions, where can I get more information applicable to my circumstances?

Please refer to the Trustee's case website www.GrantThornton.ca/Foodora under Frequently Asked Questions which provides further information.

13. I am a contractor rider of Foodora and have specific questions, where can I get more information applicable to my circumstances?

Please refer to the Trustee's case website www.GrantThornton.ca/Foodora under Frequently Asked Questions which provides further information.

14. I have other question and concerns for Grant Thornton, who can I contact?

- a. Please review the information on the Trustee's case website:
www.GrantThornton.ca/Foodora
- b. Email us (Email is recommended for the timeliest response) at: Foodora@ca.gt.com
- c. Call the toll-free number: 1-866-533-3689