

**NOTICE OF HEARING FOR THE APPROVAL OF A
PROPOSED CLASS ACTION SETTLEMENT**

**ATTENTION: ALL PERSONS IN CANADA WHO PURCHASED NIVEA MY
SILHOUETTE!™ OR NIVEA GOOD-BYE CELLULITE PRODUCTS.**

**THIS NOTICE MAY AFFECT YOUR RIGHTS
PLEASE READ ALL OF IT CAREFULLY**

Motions to authorize the bringing of class actions have been filed against Beiersdorf Canada Inc. (the “Respondent”) alleging that certain representations in the advertising for and packaging of the NIVEA MY SILHOUETTE!™ and GOOD-BYE CELLULITE products (the “Products”) were misleading.

The Parties have entered into a Settlement Agreement, pursuant to which Respondent consents to the authorization of the proposed Class Actions for the purposes only of the Settlement Agreement, the whole subject to the Court’s approval. The Parties agree to define the Class as follows:

All residents of Canada who purchased the Products at any time up to the approval of the Settlement Agreement.

The Superior Court of Quebec will conduct a hearing to approve the Settlement Agreement before Justice Gibeau, S.C.J, on December 20, 2012 at 9:30 a.m., in room 2.08, at the Montreal Courthouse, located at 1 Notre Dame Street, East, Montreal, Québec H2Y 1B6 (or at the dates and times to which the Court may, without further notice, reschedule the hearing Class.). Class Members may appear at the hearing in person or by a duly appointed counsel and show cause, if any, in accordance with the Settlement Agreement, why the Settlement Agreement should not be approved.

SUMMARY OF THE PROPOSED SETTLEMENT

The full text of the Settlement Agreement is available online at <http://www.gbcmsttlement.ca> or by contacting Class Counsel as set out below.

Subject to Court’s approval, Respondent has agreed to pay all valid claims by way of cash or coupon payments that depend on the number of Products purchased and the proof of purchase provided by the Class Member. There is no maximum overall payment to all Class Members together. Each individual Class Member is subject to a maximum recovery of \$100 (cash and coupons).

Other Notice

Should the Settlement Agreement be approved by the Court, another notice will be published in French in La Presse and in English in The Gazette, The Globe and Mail and in the National Post.

THIS NOTICE HAS BEEN AUTHORIZED BY THE QUEBEC SUPERIOR COURT

Montreal, October 31, 2012

Class Action Counsel

Me Jeff Orenstein

Consumer Law Group Inc.

1123 Clark Street, 3rd floor

Montreal (Quebec) H2Z 1K3

Telephone: (514) CONSUMER [266-7863] Ext. 220

Toll Free: 1-888-909-7863

Fax: (514) 868-9690

Email: jorenstein@clg.org

Website: www.clg.org