

ANNEXURE B

FEDERAL COURT OF AUSTRALIA NOTICE

FLIGHT CREDITS CLASS ACTION AGAINST QANTAS (Federal Court Proceeding No. VID 650/2023)

NOTICE OF PROPOSED SETTLEMENT, REGISTRATION AND OPT OUT

Dear [<First Name>],

This Notice is being sent to you by order of the Federal Court because you may be a group member in the Flight Credits Class Action against Qantas.

Qantas' records show that you are a primary point of contact for a flight booking that was scheduled to depart between 1 January 2020 and 1 November 2022 but was cancelled by Qantas.

This means that you may be entitled to receive a payment from the Proposed Settlement.

This Notice contains important information that you need to know about the **\$105 million settlement** of the Flight Credits Class Action against Qantas Airways Limited (**Qantas**) (subject to Court approval).

To receive a payment from the settlement, you **must** register by **4pm (AEST) on 2 October 2026** following the steps below. There is no out-of-pocket cost to register, and you will never be asked to pay any money to participate.

You can **confirm the legitimacy of this Notice** and that **it is not spam** by viewing a copy of it on:

- The Federal Court of Australia's website, at <https://www.fedcourt.gov.au/law-and-practice/class-actions/class-actions>
- The Applicant's solicitors' website, at www.echolaw.com.au/qantas
- Qantas' website, at <https://www.qantas.com/en-au/book/flights/travel-credits>

You should read this Notice carefully as your legal rights may be affected.

REGISTER TO RECEIVE A SETTLEMENT PAYMENT

Register to participate by **4pm (AEST) on 2 October 2026** and, if eligible, receive a settlement payment.

Qantas has agreed to pay, without admission of wrongdoing, \$105 million to settle this class action. While the amount of your payment will depend on a number of different factors, under the proposed distribution each Group Member who meets the eligibility requirements below is guaranteed a minimum payment of \$50. Some Group Members will receive significantly more than this amount.

Even persons who have used their Qantas flight credit or were ultimately refunded for their flight are eligible for a settlement payment if you meet the criteria below. This is because the case included allegations that Group Members ought to have received a refund and not a flight credit, that there were delays in paying refunds and that, where customers used their flight credit, that this was not the same as receiving a refund.

CLICK HERE TO REGISTER

Your **unique ID** for registration is: **[INSERT ID]**. You will need this ID in order to register. It is unique to you and provides you with access to register to participate in the class action, including where your details were nominated as a primary point of contact for a flight booking. You should only share it with trusted persons, for example if you want someone else to register in your place.

You can also **find further information** about this class action and how to register by clicking the link above and in the Notice below.

There are also other options available, including opting out of the class action or objecting to the Proposed Settlement, which are described below. If you do nothing, you will be bound by the Proposed Settlement but will not receive any payment.

Why am I receiving this Notice?

1. You are receiving this Notice because Qantas' records identify that you are a nominated point of contact for flight booking/s that are the subject of the Flight Credits Class Action against Qantas. You can find details about your relevant flight booking/s by clicking the Register button and using your unique ID for registration.

What is the class action about?

2. This class action relates to flight credits issued by Qantas to customers for flights that were scheduled to depart between 1 January 2020 and 1 November 2022 but were cancelled by Qantas (**Cancelled Flights**).
3. The class action alleges that Qantas breached its legal obligations by failing to provide customers with refunds for Cancelled Flights within a reasonable time and instead issued flight credits.
4. Earlier this year, the parties reached an agreement for Qantas to pay \$105 million to settle the class action, without admission of any liability. The Proposed Settlement requires Court approval to be effective. The Court will decide whether to approve the settlement and its distribution to Group Members after you have had the opportunity to register to participate.
5. The solicitors running the case are Echo Law and Piper Alderman. Litigation Funders, Omni Bridgeway and CASL, are jointly funding this class action.

Who is eligible to receive a settlement payment?

6. You are a Group Member in this class action, and eligible to receive a settlement payment, if:
 - a. you purchased for yourself or another person, or had purchased on your behalf, a ticket on a Cancelled Flight between 1 January 2020 and 1 November 2022;
 - b. **you paid Qantas (or a travel agent)** for the flight when the booking was made (either directly, or through a travel agent);
 - c. **a flight credit was issued**; and
 - d. the benefit you would be entitled to receive is at least the minimum return for eligible Group Members under the Proposed Settlement. Most commonly a person will meet this minimum unless Qantas issued you with a refund very shortly (less than 30 days) after the relevant flight booking was cancelled.
7. **Even if you have used the flight credit you were issued, or you have subsequently obtained a refund, you remain a Group Member and, if you meet the criteria above, are eligible to benefit from the Proposed Settlement.** This is because allegations are made in this class action that Group Members ought to have received a refund and not a flight credit for Cancelled Flights, that there were delays in paying refunds and that, where customers used their flight credit, that this was not the same as receiving a refund.
8. You can find more information in the proposed **Settlement Distribution Scheme** which (except for the confidential section) has been or will be published on Echo Law's website at www.echolaw.com.au/qantas from no later than 17 July 2026. If you would like to receive a copy

of the confidential section of the proposed Settlement Distribution Scheme, you can contact Echo Law after that date to request a copy on a confidential basis.

How much will I receive?

9. Under the Proposed Settlement, **Qantas has agreed to pay, without admission of any liability, \$105 million to resolve the proceedings.** This settlement sum includes all costs associated with conducting this class action, including the applicant's legal fees, the funders' commission and the costs of administering the settlement.
10. If the settlement is approved on the basis of the proposed Settlement Distribution Scheme, you will receive an amount calculated in accordance with a formula. **This amount is referred to as your 'settlement payment'.**
11. Your settlement payment is not yet known and cannot be accurately estimated yet. You should note however that any payment that eligible registered Group Members will receive will be at least \$50, being the minimum return determined under the proposed Settlement Distribution Scheme. In many cases, the amount received by eligible registered Group Members will be higher, particularly in circumstances where they had multiple eligible bookings or experienced significant delays in receiving their refunds. How much you receive may be based on a number of factors, including: the number of eligible Group Members who register to participate in the settlement; the amount of the Applicant's legal costs, disbursements and funding commission approved by the Court and the administration costs for distributing the settlement to Group Members; individual factors like the amount of money you paid for the flight/s and how long you held your flight credit/s.
12. **If you have an outstanding COVID Credit (for bookings made up to and including 30 September 2021) you can request a cash refund indefinitely, and your settlement payment is in addition to this refund.**
13. **If you register to participate in the settlement and are recorded as having an outstanding COVID Credit refund, we will seek your permission to provide your details to Qantas so that it can separately confirm whether the refund remains outstanding and, if so, make payment of that outstanding refund owed to you and/or contact you to make payment.** For bookings made after 30 September 2021 to 1 November 2022, if you had a flight credit that has not been used or refunded this will be factored into your settlement payment.
14. For Group Members whose settlement payment has been assessed and is determined to be less than the minimum return under the proposed Settlement Distribution Scheme, no money will be paid to them from the settlement sum. This is referred to as an "Ineligible Group Member". Group Members who did not pay Qantas (or pay a travel agent) for their booking are also Ineligible Group Members, however, as noted below, they will be able to indicate if they have authority to receive the settlement payment on behalf of the person who paid.

What do I need to do to register and claim a settlement payment?

15. To receive a settlement payment under the Proposed Settlement, you **must** register **before 4pm (AEST) on 2 October 2026** using the link and unique ID found earlier in this Notice. If you fail to register by this deadline, you will **not** receive any money that you may be entitled to.
16. **In order to register, you will need to confirm that you paid Qantas (or a travel agent) for the relevant flights yourself, or are registering to receive a settlement payment on behalf of the person that paid for those flights.**
17. If you did not pay for the relevant flights yourself, please provide this Notice to the person who did, so that they can register to receive a settlement payment with respect to the flight booking/s. Please be aware that this Notice and the Unique ID provides you with access to register your potential

claims in the class action, including where your details were nominated as a primary point of contact for you and other passengers.

18. During registration, you will also be asked to provide relevant payment instructions. If you need to update your details in future, you will have a chance to do so.
19. **You are not required to provide any documents to register at this stage.**
20. Echo Law, the Applicant's solicitors, may contact you to verify your registration and follow up on and / or request any outstanding information or documents.
21. If you have previously used different contact details for another flight booking/s the subject of this class action, you should also check if you have received a separate Notice at those other contact details.

What does it cost to participate?

22. **You will not pay any out-of-pocket legal costs.**

23. If the settlement is approved, the Applicant will ask the Court to approve certain deductions from the total settlement amount before payments are made to Group Members. These deductions will be shared proportionately by all registered Group Members and will only be made if the Court considers them fair and reasonable.
24. The Applicant's litigation funders (CASL and Omni Bridgeway) will also seek an order that they be paid a commission from the settlement amount. Litigation funding enabled this class action to be brought without the Applicant or Group Members being required to pay any upfront legal costs or to bear the risk of an adverse costs order if the proceeding was unsuccessful. Under the Applicant's litigation funding agreement, the litigation funders:
 - a. indemnified the Applicant against any adverse costs;
 - b. paid (and remain responsible for paying) the legal costs and disbursements of conducting the class action; and
 - c. paid, in addition to the legal costs, other costs such as the provision of security for costs, for which no reimbursement is sought to be deducted from the settlement amount;

on the basis that the funders would only receive a return if the proceeding was successful.

25. The final deductions from the settlement amount may vary as those deductions are ultimately approved by the Court.
26. The deductions the Court will be asked to approve are:

a. ***Legal costs and disbursements prior to settlement***

The reasonable legal costs and disbursements incurred by the Applicant up to 13 March 2026, estimated as \$9.23 million (inclusive of GST).

b. ***Settlement approval and administration costs***

The reasonable costs of seeking approval of the settlement from the Court, distributing Notices to potential Group Members, and administering the settlement scheme, including assessing claims and distributing settlement payments to Group Members currently estimated as \$4.76 million (inclusive of GST). This amount will be partially offset by interest earned on the settlement amount prior to distribution. Please be aware that the Court has not yet formally appointed an administrator for the settlement scheme, such that these costs may change.

c. ***Litigation funding commission***

A commission of between \$25 - \$26.25 million, being 25% from the settlement amount (adjusted based on the claims registered), to be paid to the litigation funders. The funding

commission is intended to reflect the commercial risk the funders assumed, the duration and complexity of the proceeding, and to compensate them for funding the adverse costs indemnity they provided.

d. ***Applicant and Sample Group Member payments***

Payments to the Applicant in the amount of \$20,000 and to the four Sample Group Members in the amount of \$5,000 each in recognition of the time and effort involved in representing Group Members in this class action.

27. All legal costs will be reviewed by an independent costs assessor, who will provide a report to the Court. No amount will be deducted from the settlement amount unless the Court approves it.
28. Based on the current estimates and including interest earned on the settlement sum prior to distribution, it is expected that approximately \$68 million of the \$105 million settlement (being about 65%) will be available for distribution to Group Members after these deductions, if approved by the Court.

Can I object to the settlement?

29. If you do not agree with and wish to object to the Proposed Settlement, including the way it is proposed to be distributed, **you can complete the Objection Form** available [HERE](#) and return it to the Federal Court registry **before 4pm (AEST) 4 September 2026**.
30. Even if you decide to object to the Proposed Settlement, **you should still complete the steps above to register**. Otherwise, you will not receive a settlement payment if the Court approves the settlement and you are eligible.

Can I opt out of the settlement?

31. If you do not wish to remain a group member, you also have the right to opt out of the class action. **You should only opt out if you do not wish to participate in this class action** or claim money from the proposed settlement.
32. If you wish to opt out, you must complete the Opt Out Form available [HERE](#) and return it to the Federal Court registry **before 4pm (AEST) 4 September 2026**.
33. If you opt out you will not be eligible to receive any settlement payment. You will maintain your legal rights to bring your own individual claim against Qantas, provided that you issue proceedings within the applicable time limit specific to your claim.
34. If you have permission to opt out on behalf of any other passengers or purchasers of your flight bookings covered by the class action, and those persons do not wish to participate in this class

action, you **must** also name those persons on the form and confirm that you have permission to opt out on their behalf.

35. It is a good idea to seek legal advice before choosing to opt out.

What happens if I do nothing?

36. If you do nothing and the Court approves the settlement, you will not receive any money, but you will be bound by the settlement. This means you will not be able to pursue your own individual claim against Qantas over the same issues as the class action.

37. Even if you do nothing in response to this Notice, if you have an outstanding COVID Credit for bookings up to and including 30 September 2021, you can request a cash refund from Qantas indefinitely.

What happens next?

38. By 16 October 2026, eligible Group Members who have registered will receive an estimate of their settlement payment. This is an estimate only and the settlement payment registered eligible Group Members ultimately receive may differ from the estimate provided.

39. On 13 October 2026, the Court will be asked to approve the Proposed Settlement and its distribution to Group Members. The Court will only approve the settlement if it considers that the settlement is fair and reasonable and is in the interests of all Group Members. If the Proposed Settlement is not approved by the Court, the class action will continue and there will be no distribution of monies to Group Members unless and until this proceeding is resolved.

40. If the settlement is approved by the Court, all claims made by the Applicant and Group Members against Qantas will be dismissed with the settlement releasing Qantas from the claims brought by the Applicant and on behalf of Group Members (except those who choose to opt out) that were made or could have been made in this proceeding.

41. Only eligible Group Members who register will receive any settlement payment arising from the Proposed Settlement. Group Members who choose to do nothing or opt out will not receive any share of the settlement sum.

42. However, in either situation, and regardless of whether you register to participate in this class action, opt out or choose to do nothing, if you have an outstanding COVID Credit for bookings up to and including 30 September 2021, **you can request a cash refund from Qantas indefinitely.**

43. Subject to further Court order, we anticipate that settlement payments will begin to be paid to eligible registered Group Members in late 2026. Eligible registered Group Members will receive a remittance note after their payment is made.

44. Again, **you must register before 4pm (AEST) on 2 October 2026 to receive any settlement payment.**

I am an authorised travel agent and / or the contact person for a corporate account.

What do I need to do?

45. **If you are an authorised travel agent**, you may be receiving this Notice because Qantas' records show that you are the person who was nominated to be the primary point of contact for flight booking/s the subject of the Flight Credits Class Action against Qantas purchased by one or more of your customers through you. Travel agents who booked for multiple customers and who wish to provide a copy of the Notice to their customers should not forward this Notice. Instead, travel agents should provide these customers with a copy of the Notice available on the Federal Court of Australia's website, the Applicant's solicitors' website or Qantas' website (by following the links above).

46. Your customers may also receive this Notice (if their contact information was provided to Qantas at the time the booking was made). Whether a separate copy of the Notice is received or not, you are encouraged to let your customers know that a Notice has been distributed so that they can consider their options and take steps to participate in the settlement.
47. Travel agents are not authorised to participate in the Proposed Settlement for and on behalf of their customers unless they have received authority by the relevant customer(s) to receive the settlement payment for them. Travel agents may be required to provide further information to confirm that any settlement payment received is returned to the relevant customer/s.
48. **If you are the contact person for a corporate account**, then that business or corporate entity is the Group Member eligible to receive a settlement payment. You can register to receive a settlement payment on behalf of the person or business that paid for the flight(s) if you have permission to do this and provide the relevant payment information for that business.
49. If you are **not** the correct contact person for a corporate account, please provide this Notice to the correct contact person, so that they can register.

Where can I find more information?

50. You can **find further information** about this class action, including frequently asked questions on the registration portal by clicking the link above, on the Applicant's solicitors' website, at www.echolaw.com.au/qantas or by typing this website address or searching 'Flight Credits Class Action against Qantas' in your website browser.
51. The Applicant's solicitors' website also includes copies of relevant Court documents setting out the claim that you can view, the proposed Settlement Distribution Scheme (except for a confidential section that you can request) and answers to a number of frequently asked questions.
52. The website includes copies of the Court documents setting out the claim that you can check, the proposed Settlement Distribution Scheme (except for a confidential section that you can request) and answers to a number of frequently asked questions.
53. Alternatively, you can seek your own independent legal advice or call Echo Law on **1800 571 241**. We expect to receive a large volume of enquiries, and your call may first be directed to a voicemail service. Your call will be returned as soon as possible.
54. **You should not contact the Court or Qantas in relation to this Notice or this class action.** Qantas cannot provide you with legal advice or assist with any questions relating to the class action. All queries must be directed to Echo Law in the first instance. If you need further information to register your claim, Echo Law can assist you.