



Court File No.: \_\_\_\_\_

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**

**B E T W E E N:**

**ALBERT P.T. YEE**

Plaintiff

– and –

**TELUS INTERNATIONAL (CDA) INC. (d/b/a, TELUS DIGITAL EXPERIENCE), JEFF  
PURITT, VANESSA KANU, and GOPI CHANDE**

Defendants

Proceeding under the *Class Proceedings Act, 1992*

**STATEMENT OF CLAIM**

TO THE DEFENDANTS:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyers or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFFS' CLAIM, and \$5,000.00 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and \$400.00 for costs and have the costs assessed by the court.

|              |                                                                                                                                  |
|--------------|----------------------------------------------------------------------------------------------------------------------------------|
| Date Issued: | Issued by:<br><hr/> <hr/> Local Registrar                                                                                        |
|              | <i>Address of Court Office:</i><br>Superior Court of Justice<br>330 University Avenue, 7th<br>Floor<br>Toronto, Ontario, M5G 1R8 |

**TO:**

**TELUS International (Cdn) Inc.**  
**(d/b/a, Telus Digital Experience)**  
**LEGAL DEPARTMENT**  
Floor 5, 510 West George St.  
Vancouver, British Columbia V6B 0M3

## DEFINED TERMS

1. In addition to the terms defined in ss. 1(1) and 138.1 of the *Securities Act*, R.S.O. 1990, c. S. 5, and elsewhere herein, the following capitalized terms used throughout this Statement of Claim have the meanings indicated below:

- (a) “**AI Industry**” means the artificial intelligence market focused on the application of products and services to address specific industrial uses;
- (b) “**Class (OSA Statutory)**” means all beneficial owner entities and persons, other than Excluded Persons, who acquired TIXT’s subordinate voting shares during the Class Period and who held some or all of those shares until after the release of at least one of the Public Corrective Disclosures;
- (c) “**Class (U.S. Statutory)**” means all beneficial owner entities and persons, other than Excluded Persons, who acquired TIXT’s subordinate voting shares listed on the New York Stock Exchange during the Class Period and who held some or all of those shares until after the release of at least one of the Public Corrective Disclosures;
- (d) “**Class (Common Law)**” means all Canadian beneficial owner entities and persons, other than Excluded Persons, who acquired TIXT’s common shares and who held some or all of those common shares until after the release of at least one of the Public Corrective Disclosures;
- (e) “**Class Period**” means February 9, 2023 through August 1, 2024;
- (f) “**Excluded Persons**” means the Defendant’s board members, executives, family members and business partners during the Class Periods; and
- (g) “**TIXT**” means Telus International (Cda) Inc., doing business as Telus Digital Experience.

## RELIEF CLAIMED

2. The Plaintiff claims on his own behalf and on behalf of the members of the Classes, subject to further disclosures and discovery:

- (a) a declaration that the impugned documents as set out below released by the Defendants contained misrepresentations related to the Company's business, operations and finances because the documents omitted material facts;
- (b) an order pursuant to s. 5 of the *CPA* certifying this action as a class proceeding and appointing him as the representative plaintiff for the Classes advancing the causes of action identified herein;
- (c) subject to common law and Part XXIII.1 of the *OSA*, damages in a sum to be determined, or such other sum as this Court finds appropriate at the trial of the common issues or at a reference or references;
- (d) an order directing a reference or giving such other directions as may be necessary to determine issues not determined in the trial of the common issues;
- (e) prejudgment and post-judgment interest, compounded, or pursuant to ss. 128 and 129 of the *CJA*;
- (f) costs of this action, plus, pursuant to s. 26(9) of the *CPA*, the costs of administering the plan of distribution of the recovery in this action; and
- (g) such further and other relief that this Honourable Court deems just.

## SUMMARY OF THIS ACTION

3. TIXT reported itself to the markets as a leading digital customer experience (CX) innovator that designs, builds and delivers next-generation solutions, including AI and content moderation, for global and disruptive brands. It also reported that its services supported the full lifecycle of its

clients' digital transformation journeys and enabled them to more quickly embrace next-generation digital technologies to deliver better business outcomes.

4. The focus of this pleading concerns TIXT's material fact representations about its AI services and products (a/k/a, "service line" as defined by Defendant and current CFO of TIXT, Gopi Chande) and the corresponding revenues, profit margins, and earnings per share.

5. On **February 9, 2023**, TIXT commenced a pattern of reporting to the markets about its developing AI Industry practice and, in doing so, negligently reported its *pro forma* revenues, profit margins, and earnings per share and, in doing so, affirmatively implied that these financial numbers would be similar or consistent without discounting that its AI Industry service line had materially lower margins.

6. On **May 9, 2024**, TIXT corrected material fact statements that were released during the Class Period: 1Q MD&A/financial statements with a news release and earnings call acknowledging that it once again failed to reach its targets, reducing its F/2024 guidance margins by 5% and its earnings per share, and refusing to disclose its margins by service line (we now know that the AI Industry service line is materially less than TIXT's other service lines). TIXT's share price on the TSX dropped from \$10.70 to \$8.70, and within ten (10) trading days of this news down to \$8.04.

7. On **August 2, 2024**, there were a number of material fact statements that corrected TIXT's original market fact statements to the markets: 2Q MD&A/financial statements with a news release and earnings call acknowledging that it once again failed to reach its targets, reducing its F/2024 guidance margins by 5% and earnings per share and, specifically, acknowledging that its margins were, and historically during the Class Period suffering because its competitors within the AI Industry were chasing market share and not profits (i.e. unlike TIXT's other areas). TIXT's share

price on the TSX dropped from \$9.02 to \$5.75, and within ten (10) trading days of this news down to \$4.74.

8. The Plaintiff's and putative Classes suffered a foreseeable economic loss from the market impact of the Public Corrective Disclosures.

9. The Plaintiff's allegations that TIXT negligently reported its AI Industry practice and corresponding projected revenues, profit margins, and earnings per share have been affirmed by the disclosures made on May 9 and August 2, 2024, as well as in post-Class Period disclosures.

### **THE PLAINTIFF**

10. The Plaintiff is located in the City of St. Albert, Alberta, Canada. During July 2023, he purchased a total of 14,400 shares, and in relying upon the Company's core and non-core documents to make investment decisions to purchase *and hold* TIXT's subordinate voting shares, had he known of the omitted material facts only disclosed at the time of the Public Corrective Disclosures he would not have purchased TIXT's securities on these dates. On August 4, 2024, he sold 14,400 shares at \$4.99 and realized a financial loss greater than \$20,000.

11. The Plaintiff alleges that he:

- (a) has disclosed a cause of action for common law negligent misrepresentations seeking damages for (i) purchasing shares at artificially high prices during the Class Period; and (ii) being misled into holding shares of TIXT when TIXT negligently released statements of material fact about its business operations until after the date that the Defendants' released the Public Corrective Disclosures;
- (b) in good-faith believes that there are more than several similarly situated investors like him, i.e., that purchased TIXT's shares at artificially high prices and/or held said shares during a period prior to the release of the Public Corrective Disclosures;

- (c) in good-faith believes that he shares the same common issues as other similarly situated investors;
- (d) in good-faith believes that a class proceeding would be the preferable procedure for the resolution of the common issues for their corresponding causes of action advanced herein; and,
- (e) in good-faith retained Class Counsel in Toronto, Ontario, who are experienced in Canadian and U.S. shareholder class action litigation, with numerous published court decisions reflecting their understanding of shareholder class action litigation and who have been ranked by ISS as one of the only top shareholder class action firms across Canada to recover lost capital for investors to adequately represent him and the putative members of the Classes, and can produce the same type of Litigation Plan in other similar shareholder class actions; and he does not believe that there are any conflicts of interest with the putative members of the Classes.

## **THE DEFENDANTS**

### ***Telus International (Cda), Inc.***

12. TIXT reported itself to the markets as a leading digital customer experience (CX) innovator that designs, builds and delivers next-generation solutions, including AI and content moderation, for global and disruptive brands. It also reported that its services supported the full lifecycle of its clients' digital transformation journeys and enabled them to more quickly embrace next-generation digital technologies to deliver better business outcomes.

13. TIXT's common shares, which have an ISIN identifier number CA87975H1001, were listed under the ticker symbols: (a) NYSE: "TIXT", (b) TSX: "TIXT"; and (c) numerous

alternative exchanges in Europe. As of February 9, 2023, TIXT reported that 73,083,886 subordinate voting shares were issued and outstanding.

***Directors and Officers***

14. Jeff Puritt was TIXT's former Chief Executive Officer. He signed and certified the impugned documents as being accurate and not containing misrepresentations. He also made non-core document statements containing misrepresentations as well as sold securities during the Class Period.

15. Vanessa Kanu was TIXT's global Chief Financial Officer until March 31, 2024. She signed and certified the impugned documents as being accurate and not containing misrepresentations. She also made non-core document statements containing misrepresentations as well as sold securities during the Class Period.

16. Gopi Chande replaced Vanessa Kanu during March 2024 and is TIXT's current Chief Financial Officer. She too signed and certified a few of the impugned documents as being accurate and not containing misrepresentations. She also made non-core document statements containing misrepresentations.

17. During the Class Period, SEDI.ca reports that insiders sold TIXT as follows:

(a) Kanu, Vanessa:

(i) exercised rights to sell the following rights restricted share units:

(1) 16,340 on February 17, 2023;

(2) 7,500 on February 17, 2023;

(3) 7,108 on March 21, 2023;

(4) 3,385 on May 20, 2023;

(5) 23,839 on February 12, 2024;



- (6) 13,286 on March 17, 2024;
- (7) 7,108 on March 21, 2024; and,
- (ii) disposed of the following subordinate voting shares in the public market:
  - (1) 9,112 on February 17, 2023;
  - (2) 4,183 on February 17, 2023;
  - (3) 3,947 on March 21, 2023;
  - (4) 1,913 on May 20, 2023; and,
  - (5) 12,762 on February 12, 2024;
- (b) Puritt, Jeffrey:
  - (i) exercised rights to sell 41,935 phantom options (cash) on July 6, 2023;
  - (ii) exercised rights to sell 26,751 rights performance share units on May 20, 2024;
  - (iii) redeemed, retracted, cancelled or repurchased 78,237 rights performance share units; on May 20, 2024;
  - (iv) exercised rights to sell the following rights restricted share units:
    - (1) 51,327 on February 17, 2023;
    - (2) 31,393 on March 21, 2023;
    - (3) 26,247 on May 20, 2023;
    - (4) 51,327 on February 12, 2024;
    - (5) 41,185 on March 17, 2024;
    - (6) 31,392 on March 21, 2024;
    - (7) 26,247 on May 20, 2024; and,
  - (v) disposed of the following subordinate voting shares in the public market:
    - (1) 19,793 on February 17, 2023;

- (2) 12,046 on March 21, 2023;
- (3) 10,245 on May 20, 2023; and
- (4) 18,991 on February 12, 2024.

## **THE TOTAL MIX OF INFORMATION**

18. Prior to the Class Period and concerning TIXT's AI Industry service line, TIXT reported over the last few years it had acquired Playment and Lionbridge AI to become one of the alleged global leaders of managed AI training data and data annotation services and platform providers.

19. There was also substantial core, non-core, and third-party news about TIXT's acquisition of WillowTree and its expansion into the AI Industry.

20. On **February 9, 2023**, TIXT reported core and non-core disclosures, including its Audited Annual financial statements, Annual MD&A, 4Q and F/2022 results, and provided its F/2023 outlook (but still omitted to disclose that its competitors within the AI Industry were chasing market share and not profit margins, which would materially impact TIXT as reflected in the Public Corrective Disclosures):

- (a) Revenue in the range of \$2.97 to \$3.03 billion, including \$255 to \$260 million from WillowTree representing a 10% to 12% revenue increase;
- (b) Adjusted EBITDA in the range of \$705 to \$725 million; and adjusted EBITDA margin in the range of 23.7% to 23.9%; and
- (c) Adjusted diluted EPS in the range of \$1.20 to \$1.25 per.

21. On **February 16, 2023**, TIXT hosted its Analyst/Investor Call and reported about its AI Industry service line and F/2023 projections referring to terms as "extremely well positioned to win in this rapidly evolving market," "uniquely positioned to properly represent diverse locales and cultures and reduce or remove bias in AI," "the industry's leading pioneers of AI tech," but

omitted to disclose the number of competitors that were focused on obtaining market share opposed to obtaining or maintaining 20% profit margins. Rather, Defendant Kanu reported that its 20% EBITDA margin was the upper limit (suggesting that its profit margins with its AI Industry service line could go higher).

22. On **May 4, 2023**, TIXT released its 1Q MD&A/financial statements and reported that the February 9, 2023 business operations and financials had not materially changed and provides its mid-year outlook for F/2023 (but still omitted to disclose that its competitors within the AI Industry were chasing market share and not profit margins, which would materially impact TIXT as reflected in the Public Corrective Disclosures).

23. Defendants Puritt and Kanu provided certifications that they reviewed this impugned document and it fairly presented in all material respects the financial condition and performance of TIXT.

24. These core documents negligently omitted material facts that TIXT had already known or was negligent in monitoring its AI products and services because it was later disclosed that said AI products and services generated lower margins than TIXT's other products and services, and put pressure on TIXT's proforma operations and margins.

25. TIXT reported its revenues by Industry Vertical (Tech/Games, Communications/Media, eCommerce/FinTech, Banking/Insurance, Travel/Hospitality, and all others). TIXT also reported its revenues by Geographic Regions. TIXT did not break-out its revenues or profit margins relating to its AI Industry service line.

26. During the corresponding earnings call, TIXT spoke at length about its AI Industry service line for multinational companies but omitted to disclose, as reflected by the May 9 and August 2, 2024 news releases, the Defendants knew or were negligent in not knowing or negligent in

reporting that TIXT had competition within the AI Industry service line and that these competitors were chasing market share and not profits, resulting in material competition against TIXT and its pro forma margins and EPS.

27. On **May 12, 2023**, TIXT hosted its annual general meeting and touted its alleged industry leading margins and outlook reliance upon its AI Industry service line.

28. On **July 13, 2023**, TIXT released its preliminary 2Q MD&A/financial statements and reported that the February 9, 2023 business operations and financials by providing its mid-year outlook for F/2023 (but still omitted to disclose that its competitors within the AI Industry were chasing market share and not profit margins, which would materially impact TIXT as reflected in the Public Corrective Disclosures):

- (a) Revenue in the range of \$2.7 to \$2.73 billion, including \$205 to \$215 million from WillowTree representing a 9% to 11% revenue increase;
- (b) Adjusted EBITDA in the range of \$575 to \$600 million; and adjusted EBITDA margin in the range of 21.3% to 22%; and
- (c) Adjusted diluted EPS in the range of \$0.90 to \$0.97 per.

and cautioned the markets that TIXT was taking a more cautious outlook for the balance of 2023 but implementing significant cost efficiency programs and driving further automation and generative AI solutions to further optimize its cost structure.

29. Defendants Puritt and Kanu provided certifications that they reviewed these impugned documents and that they fairly presented in all material respects the financial condition and performance of TIXT.

30. These core documents negligently omitted material fact that TIXT had already known or was negligent monitoring its AI products and services because it was later disclosed that the AI

products and services generated lower margins than TIXT's other products and services, and put pressure on TIXT's proforma operations and margins.

31. As reflected by the May 9 and August 2, 2024 news releases, the Defendants knew or were negligent in not knowing or negligent in reporting that TIXT was under material amounts of competition within the AI Industry service line and these competitors were chasing market share and not profits resulting in material competition against TIXT and its pro forma margins and EPS.

32. On **August 4, 2023**, TIXT updated the total mix of information to the market about its business financials and operations by releasing its 2Q MD&A/financial statements and affirmed its F/2023 outlook as reported on July 13, 2023 (but still omitted to disclose that its competitors within the AI Industry were chasing market share and not profit margins, which would materially impact TIXT as reflected in the Public Corrective Disclosures).

33. Defendants Puritt and Kanu provided certifications that they reviewed these impugned documents and that they fairly presented in all material respects the financial condition and performance of TIXT.

34. These core documents negligently omitted material fact that TIXT had already known or was negligent monitoring its AI products and services because it was later disclosed that the AI products and services generated lower margins than TIXT's other products and services, and put pressure on TIXT's proforma operations and margins.

35. As reflected by the May 9 and August 2, 2024 news releases, the Defendants knew or were negligent in not knowing or negligent in reporting that TIXT was under material amounts of competition within the AI Industry service line and these competitors were chasing market share and not profits resulting in material competition against TIXT and its pro forma margins and EPS.

36. On **November 3, 2023**, TIXT updated the total mix of information to the market about its business financials and operations by releasing its 3Q MD&A/financial statements and affirming its F/2023 outlook (but still omitted to disclose that its competitors within the AI Industry were chasing market share and not profit margins, which would materially impact TIXT as reflected in the Public Corrective Disclosures).

37. Defendants Puritt and Kanu provided certifications that they reviewed these impugned documents and that they fairly presented in all material respects the financial condition and performance of TIXT.

38. These core documents negligently omitted material fact that TIXT had already known or was negligent monitoring its AI products and services because it was later disclosed that the AI products and services generated lower margins than TIXT's other products and services, and put pressure on TIXT's proforma operations and margins.

39. As reflected by the May 9 and August 2, 2024 news releases, the Defendants knew or were negligent in not knowing or negligent in reporting that TIXT was under material amounts of competition within the AI Industry service line and these competitors were chasing market share and not profits resulting in material competition against TIXT and its pro forma margins and EPS.

40. On **February 9, 2024**, TIXT updated the total mix of information to the market about its business financials and operations by releasing its 4Q 2023 MD&A/financial statements and providing its F/2024 outlook (but still omitted to disclose that its competitors within the AI Industry were chasing market share and not profit margins, which would materially impact TIXT as reflected in the Public Corrective Disclosures).

41. Defendant Kanu further reported that TIXT was seeing continued momentum within its AI Industry service line (now referred to as AI Data Solutions) and its F/2024 projections incorporated the continuation of the industry-wide challenges:

- (a) Revenue in the range of \$2.79 to \$2.85 billion;
- (b) Adjusted EBITDA in the range of \$623 to \$643 million; and adjusted EBITDA margin in the range of 22.3% to 22.6%; and
- (c) Adjusted diluted EPS in the range of \$0.93 to \$0.98 per.

42. Defendants Puritt and Kanu provided certifications that they reviewed these impugned documents and that they fairly presented in all material respects the financial condition and performance of TIXT.

43. These core documents negligently omitted material fact that TIXT had already known or was negligent monitoring its AI products and services because it was later disclosed that the AI products and services generated lower margins than TIXT's other products and services, and put pressure on TIXT's proforma operations and margins.

44. As reflected by the May 9 and August 2, 2024 news releases, the Defendants knew or were negligent in not knowing or negligent in reporting that TIXT was under material amounts of competition within the AI Industry service line and these competitors were chasing market share and not profits resulting in material competition against TIXT and its pro forma margins and EPS.

#### **THE PUBLIC CORRECTIVE DISCLOSURES**

45. On **May 9, 2024**, TIXT updated the total mix of information to the market about its business operations, financials and F/2024 projections, releasing its 1Q 2024 MD&A and financial statements and reporting that its prior pro forma financial numbers were inaccurate, but without disclosing the specific reasons why, i.e, its AI service line margins.

46. Defendants Puritt and Kanu provided certifications that they reviewed these impugned documents and that they fairly presented in all material respects the financial condition and performance of TIXT.

47. These core documents continued to negligently omit the material fact that TIXT had already known or was negligent in monitoring its AI products and services, because it was later disclosed that its AI products and services generated lower margins than TIXT's other products and services, and put pressure on TIXT's proforma operations and margins.

48. As reflected by the August 2, 2024 news release, the Defendants knew or were negligent in not knowing or negligent in reporting that TIXT was under material amounts of competition within the AI Industry service line and these competitors were chasing market share and not profits resulting in material competition against TIXT and its pro forma margins and EPS.

49. TIXT's share price on the TSX dropped from \$10.70 to \$8.70, and within ten (10) trading days of this news down to \$8.04.

50. On **August 2, 2024**, TIXT updated the total mix of information to the market about its business operations, financials and F/2024 projections, by releasing its 2Q 2024 MD&A and financial statements with a news release and earnings call acknowledging that it once again failed to reach its targets, reducing its F/2024 guidance margins by 5% and earnings per share and, specifically, acknowledged that its margins were, and historically during the Class Period, suffering because its competitors within the AI Industry were chasing market share and not profits (i.e., unlike TIXT's other areas).

51. TIXT's share price on the TSX dropped from \$9.02 to \$5.75, and within ten (10) trading days of this news down to \$4.74.



## **THE CAUSES OF ACTION**

### **COMMON LAW**

52. The directors of TIXT had a special relationship with its investors, including the members of the Class because, among other reasons, the directors were voted into their position of authority and control at TIXT by investors, and certain members of the Board, and other executives consented to TIXT publishing the impugned documents.

53. A duty of care was owed to the Class Members to ensure the impugned documents did not contain misrepresentations, including that the material facts reported therein that the financial statements, and other financial information included, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant for the periods presented, and that they were consistent with the standards of public company accounting.

54. The Plaintiff relied upon the material fact statements within the impugned documents and in other related non-core documents/statements released on SEDAR and TIXT's website in making a decision to purchase the Defendant's securities and to hold all of those securities until the release of the Public Corrective Disclosures.

55. It was reasonable for members of the Class to rely upon the Defendant's core and non-core documents in making decisions to invest and to believe that the price or value of the Defendant's securities would go up in price or values.

56. The impugned documents contain misrepresentations of material fact resulting in members of the Class taking on undisclosed risks about investing in TIXT not knowing the corrective risks until after the release of the Public Corrective Disclosures (which information was known to TIXT prior to the release of the Public Corrective Disclosures but negligently omitted from its core and non-core documents/disclosures).

57. The Defendant, i.e., through its directors and officers, breached the applicable standard of care as set out above by negligently monitoring or reporting to the markets about its AI Industry service line's profit margins, earnings per share, and pro forma revenues during the Class Period which were publicly corrected with the release of the Public Corrective Disclosures.

58. The Plaintiff and members of the Class suffered a direct and foreseeable economic injury by purchasing the Defendant's securities at a time when the investment price and value was artificially inflated and holding all or some of the artificially priced securities until after the Defendant released the Public Corrective Disclosures.

### **PROVINCIAL SECURITIES ACT**

59. TIXT is a reporting and responsible issue subject to the continuous disclosure requirements of the OSA.

60. The Defendants published the impugned documents containing misrepresentations which they were negligent, deliberately disregarded to learn, or knew that said impugned documents were published while containing misrepresentations about TIXT's AI Industry service line, profit margins, and corresponding revenues and earnings-per-share.

61. The individual defendants authorized the publication of the impugned documents.

62. The Plaintiff is advancing this pleading in good faith and lost money from purchasing the Defendant's subordinate voting shares and holding said securities until after the release of the Public Corrective Disclosures.

63. Subject to s. 138.8 of the OSA and the three-year limitation of s. 138.14, the Plaintiff will advance the s. 138.3 of the OSA cause of action *nunc pro tunc* to today's date.

**U.S. FEDERAL SECURITIES EXCHANGE ACT OF 1934  
as amended by Rule 10b-5 [17 C.F.R. s. 240.10b-5]**

64. During the Class Period, TIXT listed its securities on the New York Stock Exchange and published its core and non-core documents on EDGAR.

65. The Defendants published the impugned documents containing misrepresentations which they knew or deliberately disregarded to learn whether they contained misrepresentations.

66. The individual defendants authorized the publication of the impugned documents.

67. As a result of the publication of the impugned documents, TIXT's share price and value were artificially inflated during the Class Period as measured by the drop in price and value after the release of the Public Corrective Disclosures.

68. The Plaintiff was unaware of the material fact omissions or, otherwise, the falsity of TIXT's statements contained within the impugned documents.

69. During the Class Period the Plaintiff purchased the Defendant's subordinate voting shares and said securities are the same between the TSX and NYSE, at artificially high prices and held these securities until after the release of both Public Corrective Disclosures and suffered an economic injury.

70. The Defendants violated Section 10(b) of the Securities Exchange Act of 1934.

**REAL AND SUBSTANTIAL CONNECTION WITH ONTARIO**

71. The Plaintiff pleads that this action has a real and substantial connection with Ontario and for the application of Ontario substantive and procedural laws on behalf of all Class Members for the following non-exhaustive reasons:

- (a) TIXT is a responsible issuer in Ontario;
- (b) The Plaintiff and certain members of the Classes are residents of Canada;
- (c) A majority of the Class members purchased TIXT's shares in Ontario; and

- (d) The Plaintiff and certain members of the Classes purchased shares of TIXT in Ontario.

**RELEVANT LEGISLATION, PLACE OF TRIAL AND JURY TRIAL**

72. The Plaintiff pleads and relies upon the *CJA*, *CPA*, *BCA*, as well as the Ontario *Securities Act* and U.S. Securities Exchange Act of 1934.

73. The Plaintiff proposes that this action be tried in the City of Toronto, in the Province of Ontario, as a proceeding under the *CPA*.

74. The Plaintiff may serve a jury notice.

**BERGER MONTAGUE (CANADA) PC**

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*Lawyers for the Plaintiff*

**ALBERT P.T. YEE**  
Plaintiff

and

**TELUS INTERNATIONAL (CDA) INC. et al**  
Defendants

Court File No.:

***ONTARIO***  
**SUPERIOR COURT OF JUSTICE**  
**PROCEEDINGS COMMENCED AT TORONTO**

**STATEMENT OF CLAIM**

**BERGER MONTAGUE (CANADA) PC**  
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