AVON LIQUIDATION TRUST

Instructions for Filing Talc Claims

The Avon Liquidation Trust ("the Trust") has been established under Chapter 11 of the Bankruptcy Code to resolve all Talc Claims as defined in the Fourth Amended Joint Chapter 11 Plan of Liquidation of AIO US, Inc. and its Debtor Affiliates dated September 24, 2025 [Docket No. 1550] (including all exhibits thereto and as may be amended, supplemented, or modified from time to time, the "Plan") and to use the Trust's available assets and income to pay the holders of Talc Claims in accordance with the Avon Liquidation Trust Agreement (the "Trust Agreement") and the Avon Liquidation Trust Distribution Procedures (the "TDP") in such a way that the holders of Talc Claims are treated fairly, equitably and reasonably in light of the limited assets available to satisfy such claims.

The Trust is commencing its operations and will begin receiving and processing claims on November 30, 2026 at 10:00 AM EST. The materials necessary to file a claim with the Trust, including Proof of Claim Form ("POC") and the TDP, are available on the Trust's website (www.avonliquidationtrust.com) and can be downloaded.

These instructions are intended to provide guidance in filing a Talc Claim with the Trust. **Nothing in these instructions is intended to replace or modify the requirements of the TDP or Plan documents. All claimants are encouraged to read thoroughly and understand the TDP[1] before filing a claim with the Trust.**

The Talc Claim should be filed in the name of the Injured Party whose talc injury is the basis of the claim.

[1] The TDP may be accessed through the Trust's website at www.avonliquidationtrust.com.

Statute of limitations on filing a claim:

To be eligible for processing, a Talc Claim must:

i. Have been timely filed in the tort system against a Debtor[2] prior to August 12, 2024 (the "Initial Debtor Petition Date"). If filed in the tort system prior to the Initial Debtor Petition Date, the claimant must submit, in response to Part 4[3] of the POC – Litigation/Claims History (1) the cover sheet and portions of the complaint that provide the docket number, date of filing, and show that the Debtor was named as a defendant, (2) proof of service of the complaint on the necessary party, and (3) proof that the case has not been dismissed; or

ii. If the Talc Claim was not filed against a Debtor in the tort system prior to the Initial Debtor Petition Date, it must comply with the applicable federal, state or foreign statute of limitations that was in effect at the time of the filing with the Trust. However, the running of the relevant statute of limitations may be tolled by a number of factors (see TDP Section 4.1). If a Talc Claim meets any of the tolling provisions and the claim was not barred by the applicable federal or state statute of limitation at the time of the tolling event, it shall be treated as a timely filed if it is filed with the Trust within three (3) years of the Initial Claims Filing Date.

[2] Debtors and Affiliates include the following entities: AIO US, Inc.; Avon Products, Inc.; MI Holdings, Inc.; Avon Capital Corporation; Surrey Leasing, Ltd.; Avon Americas, Ltd.; Avon Component Manufacturing, Inc.; Avon Cosmetics DE, Inc.; Avon Holdings LLC; Avon-Lomalinda, Inc.; Avon NA Holdings LLC; Avon Overseas Capital Corporation; Avon Pacific, Inc.; Avon (Windsor) Limited; California Perfume Company, Inc.; Manila Manufacturing Company; Retirement Inns of America, Inc.; Silpada Designs LLC; Surrey Products, Inc.; Viva Panama Holdings LLC.

[3] If claimant filed an asbestos-related or talc-related lawsuit against any defendants, they must also submit responses to Part 4 of the POC.

Filing Fee:
A $500 filing fee must be paid for each Talc Claim. Firms must fund their fee account with sufficient funds in advance of filing a claim.[4] A claim filed without funds available for the filing fee shall not be considered filed for purposes of tolling the statute of limitations and shall not be placed in the FIFO queue. TDP Section 5.3.

Talc Claims Review:
All Claimants must file a POC together with the required supporting documentation and a filing fee. TDP Section 4.3(a)(1).

INDIVIDUAL REVIEW (IR) AND EXPEDITED REVIEW (ER)

Mesothelioma Claims – may be filed as IR or ER claims
Other Disease Claims – must be filed as IR claims

If the Mesothelioma Claimant fails to elect either the Expedited Review process or the Individual Review process, then the Trust shall process and liquidate the claim under the Expedited Review process. TDP Section 4.3(c).

Expedited Review (ER) Claims:
Pursuant to TDP Section 4.3(b), the ER process will provide qualifying claimants with fixed claim payments subject to a payment percentage and/or made as an installment payment, as applicable (see Scheduled Value below). **If a Mesothelioma Claimant elects to proceed under ER, they shall not be required to provide information with respect to his or her other talc and asbestos exposures.** The Mesothelioma Claimant must provide detailed responses to POC Part 3(a), questions 1-7 and must also provide the exposure evidence required under Part 3(b) of the POC. *For Expedited Review, evidence may be established by an affidavit or sworn statement based on personal knowledge.*

Scheduled Value:

Valid ER Claims will be paid the following Scheduled Value, subject to TDP Section 3.2.

Disease Level	Scheduled Value
Mesothelioma	$10,000

[4] See www.avonliquidationtrust.com for instructions on funding the account.

Individual Review (IR) Claims:

All Talc Claims that are not Mesothelioma claims ("Other Disease Claims") must be resolved pursuant to the Individual Review Process. Pursuant to TDP Section 4.3(c)(1), a Mesothelioma Claimant may elect to submit his or her Talc Claim to the Individual Review Process. Pursuant to TDP Section 4.3(c)(2), Other Disease Claimants must submit the claim to IR. The liquidated value of any Trust claim that undergoes IR may be determined to be less than the Claimant would have received under ER.

Proof Required to Qualify for Payment:
To qualify for payment, a Claimant must meet the required Medical/Exposure Criteria set forth in the TDP.

Criteria for Qualification:
The medical and exposure criteria that a claim must meet to receive an offer for the Liquidated Value are as follows:

<u>Mesothelioma</u>

1. Diagnosis of mesothelioma;
2. Required Debtor Talc Exposure Information; and
3. Regular Exposure to Debtor Cosmetic Talc.

Pursuant to TDP Section 4.4(a), evidence of a diagnosis of mesothelioma is required, and it must be based upon either (i) a physical examination of the Claimant by the physician providing the diagnosis or (ii) a diagnosis by a board-certified pathologist or by a pathology report prepared at or on behalf of a hospital accredited by the Joint Commission on Accreditation of Healthcare Organizations. If the diagnosis is based upon a physical examination by the physician providing the diagnosis, the diagnosis must be supported by a medical report of the diagnosing physician and medical records demonstrating that the Claimant was treated for mesothelioma.

All diagnoses of mesothelioma shall be accompanied by either:

i. A statement by the physician providing the diagnosis that at least ten years have elapsed between the date the Debtor Talc Exposure began and the diagnosis, or

ii. A history of the Claimant's Debtor Talc Exposure sufficient to establish a ten-year latency period.

Other Disease

The Other Disease Claimant must provide the Trust with the following:

1. A disease diagnosis acceptable to the Trust and accompanied by evidence to establish a ten-year latency period between the first date of Debtor Talc Exposure and the diagnosis date;
2. Medical records demonstrating Claimant's treatment for the diagnosed disease;
3. Detailed evidence in the form of verified answers to interrogatories or deposition testimony providing the Required Debtor Talc Exposure Information along with detailed responses to the POC Part 3(a) questions 1-7. The entire deposition(s) and entire set of interrogatories must be provided;
4. Medical report or affidavit by a board-certified medical doctor, oncologist, or pathologist with qualified expertise to diagnose the disease that is being asserted establishing the Claimant's Debtor Talc Exposure as a contributing factor in causing the disease identified in the diagnosis, which report or affidavit shall include citation to peer-reviewed medical or scientific literature recognizing a causal association between talc exposure and the asserted disease;
5. Evidence that the medical or scientific community recognizes a causal link between Debtor Talc Exposure and the disease identified in the diagnosis;
6. If the Claimant is living, a report detailing a physical examination of the Claimant by the physician providing the diagnosis of the talc-related disease; and
7. The claimant must also establish to the Trust's satisfaction that the claimant had *no significant occupational or industrial exposure* (whether direct or bystander) to asbestos or asbestos products or to non-Debtor talc products.

Other Disease - Lung Cancer

In addition to the Other Disease requirements above, Claimant must provide:

1. Evidence of underlying bilateral asbestos-related nonmalignant disease diagnosed prior to or at the time of the lung cancer diagnosis; and
2. Information establishing claimant was a nonsmoker for at least thirty (30) years prior to his or her lung cancer diagnosis.[5]

[5] Claimant must answer the questions in Part 6 - Smoking History if asserting an Other Disease lung cancer claim.

Exposure Evidence Required to Establish a Talc-Related Disease:

Part 3 of the POC seeks information regarding the Claimant's exposure to Debtor's talc products. See Question 3(a) parts (1)-(7).

Required Debtor Talc Exposure Information

To qualify for any Disease Level, the Claimant must demonstrate exposure to Debtor's talc products by providing the following information: (a) the name(s) of the Debtor talc product(s) to which the Claimant was exposed; (b) the type of Debtor talc product to which the Claimant was exposed (e.g., body powder or make-up); (c) how the Claimant was exposed to the Debtor talc product (i.e., was the product applied with a shaker container, a puffer, or a brush, or was it applied/did the exposure occur in some other manner); (d) the time frame in which the Claimant was exposed to the Debtor talc product (i.e., the months and years); (e) the frequency of the Claimant's use of the Debtor talc product (i.e., daily, twice daily, etc.); (f) the duration of the Claimant's use/application of the Debtor talc product (i.e., how many minutes did each use/application typically last); and (g) information regarding where and when each Debtor talc product to which the Claimant was exposed was purchased. TDP Section 4.3(b). **Part 3(a) of the POC must be completed for each Debtor talc product the Claimant used**. Supporting documents must be uploaded separately.

For *Other Disease Claimants and Mesothelioma Claimants electing IR*, the evidence necessary to establish the Required Debtor Talc Exposure Information is to be provided by verified answers to interrogatories or deposition testimony.

Additional Exposure Requirements

All *Mesothelioma Claimants* must also demonstrate that he or she was regularly exposed for a period of at least three (3) years to talc products processed, milled, manufactured, sold, and/or distributed by a Debtor or by any other Entity for whose conduct a Debtor has liability (" Regular Exposure to Debtor Cosmetic Talc"). TDP Section 4.4(b).

Mesothelioma Claimants electing IR must also provide the following information: 1) whether the Claimant used non-Debtor talc products and the extent of such use; and 2) whether the Claimant had occupational or industrial or other exposure (whether direct or bystander) to asbestos or asbestos products other than what is alleged in cosmetic talc products and the extent of such exposure. TDP Section 4.3(c)(1).

Releases:
A properly executed release must be received by the Trust prior to any payment being made. The filing fee shall be refunded if the Claimant receives and accepts a settlement offer from the Trust. Claims that have been liquidated and resolved for payment shall be paid in FIFO order based on their place in the FIFO Payment Queue, all such payments being subject to the percentage of the liquidated values of Talc Claims to be paid in the initial installment payments and when and in what amounts additional installment payments shall be made. However, if a Claimant's only talc/asbestos exposure is to Debtor talc products, the Trust shall move the claim to the front of the FIFO Payment Queue. Pursuant to TDP Section 3.2, approved Talc Claims will initially be paid in installments and will receive additional funds if and when the TC Recovery Fund has received sufficient liquid assets to allow the Trust to issue additional distributions to Claimants.

Any claimant who receives payment for an Other Disease Claim may assert a new Talc Claim against the Trust for mesothelioma that is subsequently diagnosed. Any additional payment to which such Claimant may be entitled with respect to such mesothelioma Talc Claim shall be reduced by the amount paid by the Trust for the Other Disease Claim.

How to Initiate a Claim:

Claims can be filed electronically using the Trust Online system. To do so, download and complete the E-Filer Agreement (EFA) from the Trust website (www.avonliquidationtrust.com). Once that agreement is executed, a Trust Online user ID and password will be provided to login to the system. Trust Online supports the ability to enter new claims, edit existing claims, cure deficiencies on existing claims, upload and view supporting documents and run a variety of reports on filed claims. These features are designed to simplify and expedite the claim filing process while saving time and money for all parties. Claimants and counsel are encouraged to use these online filing features.

Claims can be filed in bulk using the Trust Online Bulk Upload Tool or using web services. These tools support the submission of multiple claims quickly and efficiently. For law firms that have claimant data already in electronic form, either tool can be used to send that data to the Trust without having to retype it into Trust Online or submit paper claims. These tools also support the submission of supporting document images along with the claim records. Contact the Trust for detailed instructions on how to use the Bulk Upload Tool or web services by email at AvonWebsupport@delcpf.com or by phone at (866) 665-5790.

Where to Submit POCs:

Electronic claim submissions, including document images, can be filed directly through the Trust Online system. There is no need to submit paper claims for Trust Online submissions.

If paper claims and documents need to be sent to the Trust, use the address below:

Avon Liquidation Trust
P.O. Box 315
Wilmington, Delaware 19899

Questions and Assistance:
A detailed user manual is available on the Trust's website under *Resources*. The website address is **www.avonliquidationtrust.com**. The Trust also offers web-based training for Trust Online users. Contact Web Support by email at AvonWebsupport@delcpf.com or by phone at 866-665-5790 to request a training.

For questions regarding your Avon claim filing please contact the Claimant Relations Department by email at avon@delcpf.com or by phone at 866-900-3732.