IN THE SUPREME COURT OF VICTORIA
COMMERCIAL COURT
GROUP PROCEEDINGS LIST

S ECI 2022 02887

BETWEEN

DAMIAN CHRISTOPHER NORRIS Plaintiff

- and -

INSURANCE AUSTRALIA GROUP LIMITED (ACN 090 739 923) Defendant

ORDER

JUDGE:	The Honourable Justice Watson
DATE MADE:	20 October 2026
ORIGINATING PROCESS:	Writ filed 29 July 2022
HOW OBTAINED:	On the papers
ATTENDANCE:	Not applicable
OTHER MATTERS:	This order is signed by the Judge pursuant to r 60.02(1)(b) of the *Supreme Court (General Civil Procedure) Rules 2025* (Vic)

THE COURT ORDERS BY CONSENT THAT:

Mediation

1. The parties shall mediate the plaintiff's claims in the proceeding and all ancillary and consequential matters. Such mediation is to commence on a date to be mutually agreed which is no later than 31 March 2027.

2. The mediation referred to in order 1 be conducted by a mediator to be agreed between the parties by no later than 18 December 2026.

Form and content of notice

3. Pursuant to s 33X(4) and (5) and s 33Y(1) of the *Supreme Court Act 1986* (Vic) (**Act**), the form and content of the following notice and correspondence be approved:

   (a) the notice informing group members about claim registration in Annexure A (**Notice**); and

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(b) the covering email for the Notice in Annexure B (**Correspondence**).

Distribution of notice

4. Pursuant to s 33Y(2) of the Act, the Notice be published and distributed as follows:

(a) **by 2 November 2026** (**Notice Date**), the plaintiff shall cause a copy of the Notice and these orders to be displayed on the website of Quinn Emanuel at https://iagclassaction.com (and to remain continuously so displayed up to the conclusion of the proceeding);

(b) by the Notice Date, the Civil Registry of the Supreme Court of Victoria shall cause the Notice to be displayed on the website of the Supreme Court of Victoria (and to remain continuously so displayed up to the conclusion of the proceeding) and to be made available for inspection at the Civil Registry of the Supreme Court of Victoria (and to remain continuously so available up to the conclusion of the proceeding);

(c) **by 20 October 2026**, the parties are to jointly engage Computershare Communication Services Pty Ltd (**Computershare**) to act as the agent in respect of the distribution of the Notice and are to send Computershare a copy of these orders;

(d) **by 23 October 2026**, the plaintiff shall provide Computershare with the following information in respect of all group members who as at the date of the plaintiff's compliance with this order 4(d) have registered their share trade details with Quinn Emanuel (**Current Registrants**), to the extent available:

(i) contact name;

(ii) email address;

(iii) home address;

(iv) name(s) of person(s) who legally or beneficially owned the shares; and

(v) any Holder Identification Number (HIN) and/or Securityholder Reference Number (SRN),

(**Current Registrants' Dataset**);

(e) **by 28 October 2026**, the defendant shall instruct Computershare to prepare, having regard to the Current Registrants' Dataset, a list of all potential group members who are not Current Registrants (**Unregistered Shareholders Distribution List**);

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(f) the defendant shall instruct Computershare to, between the Notice Date and 4 November 2026:

(i) cause the Correspondence with a link to the Notice to be sent by email during business hours to those persons on the Unregistered Shareholders Distribution List for whom there is an email address recorded on the share register; and

(ii) if no email address is recorded on the share register for a person on the Unregistered Shareholders Distribution List, cause the Notice to be sent by prepaid ordinary post to the address recorded on the share register for that person;

(g) the defendant shall instruct Computershare to:

(i) by the Notice Date, inform the parties how the Unregistered Shareholders Distribution List was prepared;

(ii) where Computershare receives an email delivery failure notification, attempt a second delivery to the intended email recipient during business hours within five business days of becoming aware of such a delivery failure (**second email notification**);

(iii) if Computershare receives a further email delivery failure notification in relation to the second email notification, cause the Notice to be sent by prepaid ordinary post to the relevant person at the address recorded for that person on the share register within three business days of receiving notice of the second delivery failure;

(h) the subject line of any Correspondence sent in accordance with these orders shall be: 'IMPORTANT LEGAL NOTICE: IAG SHAREHOLDER CLASS ACTION'; and

(i) the defendant shall instruct Computershare to, **by 20 November 2026**, provide the parties with a report containing the following information:

(i) the total number of persons on the Unregistered Shareholders Distribution List;

(ii) the total number of emails sent;

(iii) the number of emails marked delivered to the recipient;

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(iv) the number of emails marked undelivered (i.e., the count with respect to recipients for whom there is a 'bounce-back' notification);

(v) the number of notices sent by post; and

(vi) the number of postal notices returned undelivered.

Amendments to notice material

5. The materials in Annexures A and B hereto may be amended by Quinn Emanuel before they are published or distributed to correct any typographical errors, dates, or any postal, website, email address or telephone number.

6. If the Notice is amended by Quinn Emanuel in accordance with order 5 above, a copy of the amended Notice shall be provided to the Registry and the solicitors for the defendant as soon as practicable.

Costs of giving notice

7. The costs of and incidental to preparation, publication and distribution of the materials in Annexures A and B be shared equally between the parties in the first instance, but on the basis that those costs will subsequently fall to be costs in the proceeding.

Claim Registration

8. Pursuant to ss 33ZF and 33ZG of the Act, any group member who wishes to obtain any benefit arising from any settlement (subject to Court approval) of the proceeding reached at any time between the date of these orders and the first day of the trial of the proceeding must either be a Current Registrant or have registered their claim by **4:00pm AEDT on 11 December 2026** (**Registration Deadline**) by completing and submitting a Group Member Registration Form hosted by Quinn Emanuel at https://iagclassaction.com/register/ or completing and submitting the Registration Form in the form of Schedule 1 to the Notice to register@iagclassaction.com or sending it by post to Quinn Emanuel at Level 25, 85 Castlereagh Street, Sydney, NSW, 2000 marked "IAG Shareholder Class Action", using their best endeavours to include the following information (as applicable):

(a) the group member's name (or names in the case of joint shareholders), telephone number and address and/or email address;

(b) any relevant Holder Identification Number (**HIN**) or Securityholder Reference Number (**SRN**) or equivalent reference number in respect of IAG shares;

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(c) the number of IAG shares held by the group member at the close of trade on 24 June 2020;

(d) details of the group member's acquisition(s) of an interest in IAG Shares between 25 June 2020 and 20 November 2020 (inclusive), including the date of acquisition(s), the quantity acquired and the price at each acquisition;

(e) details of the group member's sale(s) and/or disposal(s) of IAG Shares between 25 June 2020 and 20 November 2020 (inclusive), including the date of each sale(s)/disposal(s), quantity sold/disposed and the price per share at each sale/disposal; and

(f) whether the group member's interest in the IAG shares acquired is beneficially held and if not the identity of the person or entity on whose behalf the IAG shares were acquired.

9. For the avoidance of doubt, failure by a group member to provide all the information required in order 8 above will not render the group member's registration invalid provided the group member is identifiable as such based on the information provided.

10. Pursuant to ss 33ZF and 33ZG of the Act, and subject to any further order of the Court, any group member who is not a Current Registrant or who has not by the Registration Deadline registered in accordance with these orders:

(a) will remain a group member in this proceeding for all purposes, including for the purpose of being bound by any judgment in this proceeding and being bound by the terms (including releases) of any approved settlement agreement in the proceeding; and

(b) shall not, without leave of the Court, be permitted to seek any benefit pursuant to any in-principle settlement (subject to the approval of the Court) of this proceeding reached at any time between the date of these orders and the first day of the trial of the proceeding.

11. **By 18 December 2026**, the plaintiff must:

(a) deliver to the solicitors for the defendant a list of all Current Registrants and persons who registered pursuant to order 8 above containing (if available):

(i) a unique identification number for each such person;

(ii) the information listed in order 8 for each such person; and

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(iii) any amendments to the information as notified to Quinn Emanuel by that date; and

(b) file confidentially on RedCrest the list referred to in order 11(a).

12. The list provided to the solicitors for the defendant in accordance with order 11(a), and any information contained therein, is to be kept confidential by the defendant's solicitors and may only be provided to any person meeting one of the following descriptions:

(a) a barrister retained by the defendant in the proceeding;

(b) those officers and employees of the defendant who provide instructions in relation to the proceeding on behalf of the defendant;

(c) the defendant's insurers (and their legal advisers);

(d) experts or third-party consultants retained by the defendant in the proceeding; or

(e) any mediator who may be engaged by the parties or appointed by the Court.

DATE AUTHENTICATED: 20 October 2026

THE HONOURABLE JUSTICE WATSON

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ANNEXURE A

SUPREME COURT OF VICTORIA

IMPORTANT NOTICE

IAG SHAREHOLDER CLASS ACTION

Damian Christopher Norris v Insurance Australia Group Limited (ACN 090 739 923)

(S ECI 2022 02887)

THIS NOTICE IS PUBLISHED BY ORDER OF THE SUPREME COURT OF VICTORIA

IT IS IMPORTANT THAT YOU READ THIS NOTICE CAREFULLY BECAUSE IT MAY AFFECT YOUR LEGAL RIGHTS

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Associate of a Judge of the Court

REGISTRATION AND IMPORTANT NOTICE

IAG SHAREHOLDER CLASS ACTION

Damian Christopher Norris v Insurance Australia Group Limited (IAG) (ACN 090 739 923)

(S ECI 2022 02887)

Why am I receiving this notice?

1. The Supreme Court of Victoria has ordered that you receive this Notice because, according to information contained in the share register of Insurance Australia Group Limited (**IAG**), you may be a Group Member in this class action.

2. You may be a Group Member in this class action if you acquired an interest in IAG shares between **25 June 2020 and 20 November 2020 (inclusive)** (**Claim Period**) and suffered loss or damage by reason of the conduct alleged in the proceeding. Please note that the Claim Period in this proceeding was amended by Court order on 26 June 2026.

3. If you have already provided Quinn Emanuel with your IAG share trade information in connection with this proceeding, **you do not need to do anything in response to this Notice.**

4. The purpose of this Notice is to give those persons who have not registered their claim an option to register if they wish to participate in any potential settlement of the class action (**Unregistered IAG Group Members**).

5. It is important that you read this Notice carefully because it may affect your legal rights.

6. If you are an Unregistered IAG Group Member and you wish to be eligible to take part in any settlement reached between the plaintiff and IAG before the start of trial, you must register your claim with Quinn Emanuel by **4:00pm AEDT on 11 December 2026**.

   IMPORTANT: As set out above, if you have already registered with Quinn Emanuel, you do not need to respond to this Notice.

What is this class action about?

7. This class action was filed in 2022. It relates to allegations that in 2020 IAG engaged in misleading or deceptive conduct, and failed to comply with its continuous disclosure obligations as an ASX listed company, contrary to relevant provisions of the *Corporations Act 2001* (Cth), the *ASIC Act 2001* (Cth) and the Australian Consumer Law, in relation to IAG's disclosures in connection with its potential exposure to business interruption claims arising from the COVID-19 pandemic.

8. The IAG Shareholder Class Action alleges that because of this conduct the plaintiff and other IAG shareholders paid more for shares in IAG than would have been the case had IAG complied with its obligations. Alternatively, the class action alleges that some group members would not have purchased shares in IAG had the alleged wrongdoing not occurred.

9. IAG denies the allegations and is defending the class action.

10. A copy of the plaintiff's Amended Writ indorsed with his Amended Statement of Claim (**Amended Claim**) is available at https://iagclassaction.com. The Amended Claim, IAG's defence, and other court documents relevant to the proceeding are also available on the Supreme Court's website at https://www.supremecourt.vic.gov.au/areas/group-proceedings/iag.

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ARE YOU A GROUP MEMBER IN THE IAG SHAREHOLDER CLASS ACTION?

11. You may be a Group Member if you acquired shares in IAG during the Claim Period. Further details on the Group Member definition are set out in paragraph 1 of the plaintiff's Amended Statement of Claim, a copy of which is available at https://www.supremecourt.vic.gov.au/areas/group-proceedings/iag.

If you meet the criteria in paragraph 1 of the Amended Statement of Claim, you are a Group Member in the class action and you should read this Notice carefully as it will affect your rights.

OPTION 1 – REGISTER YOUR CLAIM

12. If you wish to obtain any benefit pursuant to any settlement reached by the parties before the start of trial, you must register your claim by **4:00pm AEDT on 11 December 2026 (unless you have already registered your claim, in which case you do not need to take any further action).**

13. It is free to register and you will not be liable for any upfront or "out of pocket" costs by registering your claim.

14. To register, you must complete and submit a Registration Form by **4:00pm AEDT on 11 December 2026**.

15. The Registration Form is available to complete online at https://iagclassaction.com/register/.

16. Alternatively, you can complete a hard copy Registration Form (see Schedule 1 to this Notice) and submit it:

    (a) by email to register@iagclassaction.com; or

    (b) by post, to the following address:

        IAG Shareholder Class Action

        Quinn Emanuel Urquhart & Sullivan

        Level 25, 85 Castlereagh Street,

        SYDNEY NSW 2000

17. If you are an Unregistered IAG Group Member and:

    (a) you do not register by the deadline, **4:00pm AEDT on 11 December 2026;** and

    (b) a settlement is reached between the parties before the first day of trial, which is listed for hearing on 10 May 2027,

you will remain a Group Member but you will not be entitled to be paid any compensation from this class action, even if you would otherwise have had an eligible claim, subject to further order of the Court.

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OPTION 2 – DO NOTHING IN RESPONSE TO THIS NOTICE

18. If you do nothing in response to this Notice, and you are an Unregistered IAG Group Member, you will remain a Group Member in the class action.

19. As set out above, if you are an Unregistered IAG Group Member, and you do nothing in response to this Notice, and

    (a) a settlement is reached between the plaintiff and defendant before the first day of trial, and the settlement is approved by the Court, you will not be entitled to obtain any benefit pursuant to any settlement, without leave of the Court. You will, however, be bound by the settlement, including any terms releasing the defendant in respect of matters related or similar to the claims the subject of the class action (despite not being eligible to seek any benefit). This means that your right to bring your own claim against the defendant for matters related or similar to the claims the subject of this class action will be extinguished.

    (b) If no settlement is reached between the plaintiff and defendant before the first day of trial, you will be bound by the final judgment in the class action, and you will be entitled to obtain any damages awarded by the Court (if you satisfy the eligibility criteria set down by the Court) in the event that the Court finds in favour of the plaintiff and Group Members. If the class action is unsuccessful, or is not as successful as you might have wished, you will not be able to sue on the same claim in any other proceedings.

FURTHER INFORMATION

20. If there is anything in this Notice of which you are unsure, you should:

    (a) email Quinn Emanuel at iagclassaction@quinnemanuel.com; or

    (b) seek independent legal advice.

21. The Supreme Court should not be contacted for legal advice.

This Notice was approved by the Supreme Court and published pursuant to orders made on 20 October 2026.



SCHEDULE 1

IAG SHAREHOLDER CLASS ACTION

Damian Christopher Norris v Insurance Australia Group Limited

(S ECI 2022 02887)

GROUP MEMBER REGISTRATION FORM

PLEASE COMPLETE THIS FORM IF YOU WANT TO REGISTER FOR THE IAG SHAREHOLDER CLASS ACTION.

If you would like to register, by **4:00pm AEDT on 11 December 2026** you must complete an online version of this form at https://iagclassaction.com/register/, or alternatively, you must return a hard copy of this form to Quinn Emanuel by:

Post: IAG Shareholder Class Action
Quinn Emanuel Urquhart & Sullivan
Level 25, 85 Castlereagh Street,
SYDNEY NSW 2000

Email: iagclassaction@quinnemanuel.com

If you are unsure whether you are a Group Member of the IAG Shareholder Class Action, or if you have any questions about completing this form, please contact Quinn Emanuel by email at iagclassaction@quinnemanuel.com or by phone on (02) 9146 3637.

A. CONTACT / IDENTIFICATION DETAILS

What are the details of the person(s), company, self-managed super fund (SMSF), or other entity that owned or was beneficially entitled to the IAG Shares?	Name: ABN/ACN (if applicable): HIN/SRN (if applicable):	
Are you filling out this form on behalf of yourself, a company, self-managed super fund (SMSF) or someone else who is or was a holder of IAG Shares?	☐Yes – I'm filling this out on behalf of a company, SMSF or another person or entity who is or was the owner of, or beneficially entitled to, IAG Shares	☐No – I'm filling this out for myself, and I am or was the owner of, or beneficially entitled to, IAG Shares

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If **yes**, in what capacity do you represent the person or entity who owned or was beneficially entitled to IAG Shares? (e.g. Director of company, trustee of trust, solicitor for the person or entity, person authorised to act by power of attorney)	
Email address:	
Postal address:	
Telephone number:	
Holder Identification Number (HIN) or Securityholder Reference Number (SRN)[1]:	

B. SHAREHOLDING DETAILS

Opening balance:

Number of IAG Shares held as at the close of trading on 24 June 2020:	

Insert details of all IAG share transactions during the period 25 June 2020 to 20 November 2020:

Transaction Type*	Buy/Sell	Trading date	Quantity	Price per Share	Total

**For example, if the shares were acquired or disposed "On-Market", "Off-Market Transfer", "DRP", "Capital Raising", "Short selling", "Equity Swap Confirmation".*

[1] You can find the HIN/SRN number on your trade confirmation statement. It will either be 10 or 11 characters in length. If it is 11 characters in length, the HIN or SRN begins with the letter i, n or x. The remaining 10 characters are numbers. For example, i0012345678, n0012345678, x0012345678.

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C. SIGNATURE

Signature of person completing form: ……..

Name of person completing form: …….

Date of signature: ……..

D. DELIVERY INSTRUCTIONS

Please return the completed form by email or post to the following address, so that it is received by no later than **4:00pm AEDT on 11 December 2026**:

Post: IAG Shareholder Class Action

Quinn Emanuel Urquhart & Sullivan

Level 25, 85 Castlereagh Street,

SYDNEY NSW 2000

Email: iagclassaction@quinnemanuel.com

By signing and sending this form, you acknowledge that:

- you are the registrant or are acting on behalf of and with the authority of the registrant;
- the information you have provided above is true and correct to the best of your knowledge; and
- you have read and understood our Privacy Policy https://www.quinnemanuel.com/privacy-policy/



ANNEXURE B

[SUBJECT] **IMPORTANT LEGAL NOTICE: IAG SHAREHOLDER CLASS ACTION**

We are contacting you because you may be a group member in the IAG Shareholder Class Action. Our records show that you have not yet registered your claim to participate in the class action with the plaintiff's solicitors, Quinn Emanuel.

Please read this email carefully and consider your options. It contains important information that may affect your legal rights.

This email has been sent pursuant to Court orders made on 20 October 2026.

A copy of the full Notice (**Notice**) is available here https://iagclassaction.com.

What is the class action about?

This class action was filed in 2022. It relates to allegations that, in 2020, Insurance Australia Group Limited (**IAG**) engaged in misleading or deceptive conduct and failed to comply with its continuous disclosure obligations as an ASX listed company, contrary to relevant provisions of the *Corporations Act 2001* (Cth), the *ASIC Act 2001* (Cth) and the Australian Consumer Law, in relation to IAG's disclosures in connection with its potential exposure to business interruption claims arising from the COVID-19 pandemic.

IAG denies the allegations and is defending the class action.

Registration of claim

The Court has made orders that any person who wishes to participate in any settlement of this class action that may be reached by the parties at any point up until the first day of trial must register their claim.

To register, you must complete a registration form by **4:00pm AEDT on 11 December 2026.** You can register your claim here https://iagclassaction.com/register/.

The Notice includes information about how to register your claim to participate in any settlement reached between the parties in the class action at any point up until the first day of trial and what happens if you choose to do nothing in response to the Notice.

If there is anything in the Notice that you do not understand, or if you have any questions about the Notice, you may seek independent legal advice or contact Quinn Emanuel, the solicitors for the plaintiff, by email at iagclassaction@quinnemanuel.com.

Yours sincerely,

Quinn Emanuel Urquhart & Sullivan

