

**IN THE SUPREME COURT OF VICTORIA
AT MELBOURNE
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: 5 December 2024

ORIGINATING PROCESS: Writ filed 29 July 2022

HOW OBTAINED: On the papers

ATTENDANCE: Not applicable

OTHER MATTERS: A. This order is signed by the Judge pursuant to rule 60.02(1)(b) of the *Supreme Court (General Civil Procedure) Rules 2015 (Vic)*

THE COURT ORDERS THAT:

Class deadline

1. The time and date by which a Group Member may opt out of the proceeding pursuant to section 33J(1) of the *Supreme Court Act 1986 (Vic)* (**the Act**) be fixed as **4:00pm (AEDT) on 13 March 2025 (Class Deadline)**.

Notice

2. The terms of the commencement, opt out and claim registration notice set out at:
 - (a) Annexure A (**Notice**); and
 - (b) Annexure B (**Covering Email**),



to these orders are approved, pursuant to sections 33X(1)(a) and (5) and 33Y of the Act.

3. Pursuant to s 33Y of the Act, the Notice be given to group members according to the following procedure:

(a) by **4:00pm on 6 December 2024**, 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 this order;

(b) by **4:00pm on 9 December 2024**, Computershare to provide the parties with the total number of persons who acquired shares, or entered into a contract to acquire an interest in the defendant during the period 11 March 2020 and 20 November 2020 (inclusive), including those security holders whose qualifying transactions were recorded on the register within the two-day settlement window following 20 November 2020 and are not any of the following:

(i) a related party (as defined by s 228 of the *Corporations Act 2001* (Cth) (**Corporations Act**) of IAG;

(ii) a related body corporate (as defined by s 50 of the *Corporations Act*) of IAG;

(iii) an associated entity (as defined by s 50AAA of the *Corporations Act*) of IAG;

(iv) an officer or close associate (as defined by s 9 of the *Corporations Act*) of IAG; or

(v) one or more of the persons referred to in s 33E(2) of the *Supreme Court Act 1986* (Vic)

(identified Shareholder).

(c) The defendant shall instruct Computershare to, between **11 and 13 December 2024**:

(i) cause the Covering Email with a link to the Notice to be sent by email during business hours to any identified Shareholder of whom there is an email address recorded on the share register;



- (ii) if no email address is recorded on the share register, Computershare is to cause the Notice to be sent by prepaid ordinary post to the address recorded for the identified Shareholder on the share register.
- (d) The defendant shall instruct Computershare to:
 - (i) 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**);
 - (ii) if Computershare receives further email delivery failure notification in relation to the second email notification, to cause the Notice to be sent by prepaid ordinary post to the identified Shareholder at the address recorded for that person on the share register within three business days of receiving notice of the second delivery failure.
- (e) The subject line of any Covering Email sent in accordance with paragraph 3 of this order shall be: “Important Class Action Court Notice – Norris v Insurance Australia Group Limited S ECI 2022 02887”.
- (f) Between **11 and 13 December 2024**, the plaintiff shall cause a copy of the Notice to be sent by email during business hours to each group member who has, at the date of this order, identified themselves to Quinn Emanuel Urquhart & Sullivan (**Quinn Emanuel**) and for whom Quinn Emanuel hold a current email address.
- (g) By **11 December 2024**, the Commercial Court 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 and including the conclusion of the proceeding) and made available for inspection at the Commercial Court Registry of the Supreme Court of Victoria (and to remain continuously so available up to and including the conclusion of the proceeding).
- (h) By **11 December 2024**, the plaintiff shall cause a copy of the Notice and this order to be displayed on the website of Quinn Emanuel at <https://iagclassaction.com/>, and to remain continuously so displayed up to and including the conclusion of the proceeding.



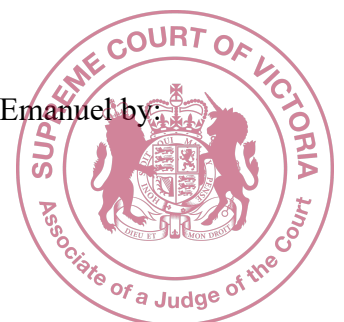
- (i) The Notice and Covering Email may be amended by agreement between the parties before they are published or distributed in order to amend the appearance or formatting of the Notice and Covering Email and/or in order to correct any typographical error, or any postal, website or email address or telephone number.
 - (j) If the Notice is amended in accordance with paragraph 3(i) of this order, Quinn Emanuel shall forthwith provide a copy of the amended Notice to the Commercial Court Registry of the Supreme Court of Victoria.
4. The costs of distributing the Notice and Covering Email (including any disbursements incurred) in accordance with order 3 be paid by the plaintiff in the first instance, but on the basis that those costs will subsequently fall to be costs in the proceeding.
5. The defendant shall instruct Computershare to, by **10 January 2025**, provide the parties with a report containing the following information:
 - (a) the total number of emails sent;
 - (b) the number of emails marked delivered to the recipient;
 - (c) the number of emails marked undelivered (i.e., the count with respect to recipients for whom there is a ‘bounce-back’ notification);
 - (d) the number of notices sent by post; and
 - (e) the number of postal notices returned undelivered.

Opt Out

6. Pursuant to section 33J(2) of the Act, any group member who wishes to opt out of this proceeding must, before the Class Deadline:
 - (a) submit a completed ‘Opt Out Notice’ in the form of Schedule 2 to the Notice (**Opt Out Form**) to optout@iagclassaction.com or by post to Quinn Emanuel; or
 - (b) complete and submit the **Online Opt Out** via Quinn Emanuel’s website at: <https://iagclassaction.com/optout/>



7. Each group member who wishes to opt out of the group proceeding in accordance with paragraph 6 of this order must complete the Opt Out Form or Online Opt Out either:
- (a) by personally signing or personally affixing their electronic signature;
 - (b) in the case of a corporation who is a group member, by a director of the corporation personally signing or personally affixing their electronic signature;
 - (c) by the group member's solicitor personally authorised to act on behalf of the group member personally signing or personally affixing their electronic signature as that group member's solicitor;
 - (d) in the case of an executor of an estate which is a group member, by the executor personally signing or personally affixing their electronic signature;
or
 - (e) in the case of a person holding a power of attorney for a group member, by the attorney personally signing or personally affixing their electronic signature.
8. If, on or before the Class Deadline, the solicitors for the defendant receives a notice purporting to be an Opt Out Form referable to this proceeding, they shall forthwith provide the notice to Quinn Emanuel within 10 days after receipt of the notice with a notation specifying the date it was received, and the notice is to be treated as an Opt Out Form received by the Quinn Emanuel at the time it was received by the defendant.
9. The defendant is to instruct Computershare to, if, on or before the Class Deadline, it receives a notice purporting to be an Opt Out Form referable to this proceeding, forthwith provide the notice to Quinn Emanuel within 10 days after receipt of the notice with a notation specifying the date it was received and the notice is to be treated as an Opt Out Form received by Quinn Emanuel at the time it was received by Computershare.
10. By 3 April 2025, Quinn Emanuel is to provide the Commercial Court Registry of the Supreme Court of Victoria with:
- (a) an electronic bundle of all Opt Out Forms received by Quinn Emanuel by:



- (i) the Class Deadline; and
 - (ii) between the Class Deadline and 2 April 2025
- (b) an Excel spreadsheet containing:
- (i) a list of all Opt Out Forms received;
 - (ii) the information captured in each Opt Out Form; and
 - (iii) in the case of an Opt Out Form received between the Class Deadline and 2 April 2025, the date upon which it was received
- with an electronic link to each Opt Out Form or some form of identifier which allows for the Opt Out Form to be quickly identified in the electronic bundle referred to in (i) above.

(the **Opt Out List**).

11. For the purposes of r 28.05(5) of the *Supreme Court (General Civil Procedure) Rules 2015*, documents submitted in accordance with paragraph 10 above are to be treated as confidential and shall not be available for inspection to non-parties absent further order.
12. On 3 April 2025, Quinn Emanuel is to provide the defendant's solicitors with the Opt Out List.

Claim Registration

13. Pursuant to sections 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 three months after the first day of mediation fixed by these orders must register their claim by the Class 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 by post to Quinn Emanuel, using their best endeavours to include the following information (as applicable):
 - (a) the group member's name (or names in the case of joint security holders), telephone number and address and/or email address;
 - (b) any relevant Holder Identification Number (**HIN**) or Security Reference Number (**SRN**) or equivalent reference number in respect of IAG Shares;



- (c) the number of IAG Shares held by the group member at the close of trade on 10 March 2020;
 - (d) details of the group member's acquisition(s) of an interest in IAG Shares between 11 March 2020 and until 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 11 March 2020 and until 20 November 2020 (inclusive), including 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 (**Beneficial Owner**).
14. A group member who registers pursuant to paragraph 13 of this order is a **Registered Group Member**. A group member is deemed to be a Registered Group Member if, by the date of these orders, the group member has already registered their interest with Quinn Emanuel in connection with this proceeding.
15. Group members who are deemed to have registered by the operation of order 14 above, and who want to obtain any benefit arising from any settlement must provide to Quinn Emanuel as soon as practicable, but in any event by no later than the Class Deadline, using their best endeavours and to the extent that they have not already done so, the same information as other group members are required to submit, pursuant to order 13 above.
16. For the avoidance of doubt, failure by a group member to provide all the information required in order 13 above will not render the group member's registration invalid provided the group member is identifiable as such based on the information provided.
17. Pursuant to sections 33ZF and 33ZG of the Act, and subject to any further order of the Court, any group member who by the Class Deadline does not register or opt out of the proceeding 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 three months after the first day of mediation fixed by these orders.

18. By **21 March 2025**, the plaintiff must:

- (a) deliver to the solicitors for the defendant a list of the Registered Group Members, containing (if available):
 - (i) a unique identification number for each Registered Group Member;
 - (ii) the information listed in order 13 for each Registered Group Member;
and
 - (iii) any amendments to the information as notified to Quinn Emanuel by that date;
- (b) file confidentially on RedCrest a list of Registered Group Members which shall contain, if available:
 - (i) a unique identification number for each Registered Group Member;
 - (ii) the information listed in order 13 for each Registered Group Member;
and
 - (iii) any amendments to the information as notified to Quinn Emanuel by that date.

19. The list of Registered Group Members provided to the solicitors for the defendant in accordance with order 18(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 and only after that person has returned to the defendant's solicitors a signed undertaking in the form of **Schedule 1** to these orders:

- (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.

Mediation

- 20. 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 16 May 2025.
- 21. The mediation conducted in accordance with order 20 be conducted by a mediator agreed between the parties or, if the parties cannot agree on a mediator by **13 February 2025**, the mediator is to be a Judicial Registrar of the Supreme Court of Victoria.

General

- 22. The case management conference listed for hearing on 24 February 2025 be vacated.
- 23. The matter be relisted for a case management conference at 9:30am on 3 March 2025.
- 24. The Notice may be amended by agreement between the parties before it is published and distributed in order to insert any relevant date, correct any website, email address, telephone number, or other non-substantive, typesetting, or typographical error.
- 25. Costs reserved.
- 26. Liberty to apply.

DATE AUTHENTICATED: 5 December 2024



THE HONOURABLE JUSTICE WATSON



SCHEDULE 1

Confidentiality Undertaking

I, _____ of
_____ hereby undertake to the Court
as follows:

Definitions

Plaintiff means Damian Christopher Norris.

IAG means Insurance Australia Group Limited (ACN 090 739 923).

Court means the Supreme Court of Victoria.

Registration Information means the information defined in Order 11 of the orders made in the Proceeding on [date].

Proceeding means *Damian Christopher Norris v Insurance Australia Group Limited (ACN 090 739 923) (S ECI 2022 02887)* in the Supreme Court of Victoria.

General Terms of Undertaking

- 1 I must keep the Registration Information strictly confidential at all times and shall use it only for the purposes of assessing the potential quantum of claims of the Plaintiff or group members in the Proceeding.
- 2 I may only disclose the Registration Information if:
 - (a) permitted to do so by this undertaking; or
 - (b) compelled to do so by law.
- 3 I may disclose the Registration Information to the solicitors acting for IAG in the Proceeding, the plaintiff or his solicitors and any of the following persons, provided those persons have executed a Confidentiality Undertaking in the form of this undertaking:
 - (a) barristers retained by IAG in the Proceeding;
 - (b) IAG's insurers (and their legal advisers);
 - (c) an officer or employee of IAG who provides instructions in relation to the Proceeding on behalf of IAG;
 - (d) an expert or third-party consultant engaged on behalf of IAG in the Proceeding; or
 - (e) any mediator engaged for the purpose of the Proceeding or appointed by the Court.



Signature

Date



ANNEXURE A - NOTICE

SUPREME COURT OF VICTORIA



NOTICE TO GROUP MEMBERS:

REGISTRATION & OPT OUT NOTICE

IAG SHAREHOLDER CLASS ACTION

Damian Christopher Norris v Insurance Australia Group Limited (ACN 090 739 923)
(S ECI 2022 02887)

THIS NOTICE IS SENT BY ORDER OF THE SUPREME COURT OF VICTORIA.
IT IS IMPORTANT THAT YOU READ THIS NOTICE CAREFULLY BECAUSE IT MAY AFFECT
YOUR LEGAL RIGHTS.

THE CLASS DEADLINE IS 13 MARCH 2025



OPT OUT AND REGISTRATION NOTICE

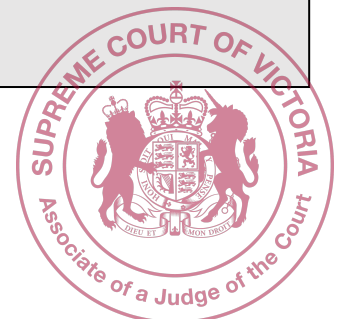
IAG SHAREHOLDER CLASS ACTION

SUMMARY

- A. 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.
- B. You may be a Group Member in this class action if you acquired an interest in IAG shares between 11 March 2020 and 20 November 2020 (inclusive) (**Claim Period**) and suffered loss or damage by reason of the conduct alleged in the proceedings.
- C. The purpose of this Notice is to provide you with information about the class action and give you the option to register if you wish to participate in any settlement or 'opt out' of the class action.
- D. If you wish to be eligible to take part in any settlement reached between the Plaintiff and IAG at an upcoming mediation, you must register your claim with the lawyers for the Plaintiff by **4:00pm AEDT on 13 March 2025**. The Court has ordered that the parties attend a mediation by 16 May 2025. A mediation allows the parties to explore whether they can reach agreement about the outcome of the action (subject to Court approval).

WHAT DO YOU NEED TO DO?

- E. You have three options for responding to this notice (and you can only choose one option):
 - (a) **OPTION 1: Register** → The deadline to register your claim is **4:00pm AEDT on 13 March 2025**. If you do not register by the deadline, you will remain a Group Member in the class action but, subject to further order of the Court, you will not be entitled to obtain any benefit pursuant to any settlement reached between the parties at any point up to three months after the first day of mediation. Registering your claim is cost free. At no stage will you be liable for any out of pocket costs by registering your claim. Click here to register <https://iagclassaction.com/register/> or you can email or post a Registration Form (found at Schedule 1 of this Notice) to Quinn Emanuel.
 - (b) **OPTION 2: Opt Out** → If you do not wish to remain a Group Member, you can opt out of the class action. The deadline to opt out is **4:00pm AEDT on 13 March 2025**. The Online Opt Out form is available to complete at <https://iagclassaction.com/optout> or you can email or post an Opt Out Form (found at Schedule 2 of this Notice) to Quinn Emanuel.
 - (c) **OPTION 3: Do nothing** → If you do nothing in response to this Notice you will remain a Group Member of the class action but, subject to any further order of the Court, you will not be entitled to obtain any benefit pursuant to any settlement of the class action reached at any point up until three months after the first day of mediation.



A. WHAT IS THE IAG SHAREHOLDER CLASS ACTION ABOUT?

1. The Plaintiff, Mr Damian Norris, has commenced this class action on his own behalf and on behalf of all shareholders who acquired an interest in, or entered into a contract to acquire an interest in, IAG shares in the Claim Period, being the period between 11 March 2020 and 20 November 2020 (inclusive) and suffered loss or damage by reason of the conduct alleged in the proceeding.
2. The Plaintiff's allegations concern IAG's disclosures in connection with its potential exposure to business interruption claims arising from the COVID-19 pandemic during the Claim Period.
3. IAG denies the allegations and is defending the class action.

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

4. You are a Group Member if you meet the following criteria:
 - (a) during the Claim Period (11 March 2020 and 20 November 2020 (inclusive)), you acquired an interest in, or entered into a contract to acquire an interest in, one or more shares in IAG (**IAG Shares**); and
 - (b) you have suffered loss or damage by, because of or resulting from the alleged conduct of IAG as pleaded in the Statement of Claim; and
 - (c) you were not, during the Claim Period, any of the following:
 - (i) a related party (as defined by s 228 of the *Corporations Act 2001* (Cth) (**Corporations Act**)) of IAG;
 - (ii) a related body corporate (as defined in s 50 of the *Corporations Act*) of IAG;
 - (iii) an associated entity (as defined in s 50AAA of the *Corporations Act*) of IAG;
 - (iv) an officer or close associate (as defined in s 9 of the *Corporations Act*) of IAG;
 - (v) one of the persons referred to in s 33E(2) of the *Supreme Court Act 1986* (Vic).
5. The full Group Member definition appears at paragraph 1 of the Plaintiff's Statement of Claim, a copy of which is available at <https://www.supremecourt.vic.gov.au/areas/group-proceedings/iag>.
6. If you meet the above criteria, you are a Group Member in the class action and you should read this Notice carefully as it will affect your rights.

C. OPTION 1 – REGISTER

7. If you wish to obtain any benefit pursuant to any settlement reached by the parties at any point up until three months after the first day of mediation, you **must** register your claim by **4.00pm AEDT on 13 March 2025**.
8. It is free to register and you will **not** be liable for any upfront or "out of pocket" costs by registering your claim.



9. To register, you must complete and submit a Registration Form by **4.00pm AEDT on 13 March 2025**.
10. The Registration Form is available to complete online at <https://iagclassaction.com/register/>
11. 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 15, 111 Elizabeth Street,
SYDNEY NSW 2000
12. If you have previously registered your interest in the class action with Quinn Emanuel Urquhart & Sullivan (**Quinn Emanuel**), you do not need to register again, but you may be contacted by a representative of Quinn Emanuel to ensure that you have provided all the information that is necessary in order to complete your registration.
13. If you do not register by the deadline, **4.00pm (AEDT) on 13 March 2025** and a settlement is reached between the parties at any point up until three months after the first day of mediation, 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.

OPTION 2 – OPT OUT AND CEASE TO BE A GROUP MEMBER

14. If you do not want to remain a Group Member in this class action, you **must** opt out by **4.00pm AEDT on 13 March 2025**.
15. If you wish to opt-out, you can do so by:
 - (a) completing the Opt Out Form at Schedule 2 to this notice and returning it directly to the plaintiff's solicitors, Quinn Emanuel:
 - (i) by post to:

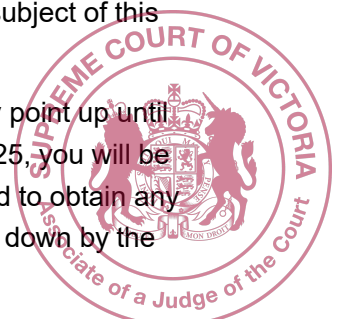
IAG Shareholder Class Action
Quinn Emanuel Urquhart & Sullivan
Level 15, 111 Elizabeth Street,
SYDNEY NSW 2000
 - or,
 - (ii) by email at optout@iagclassaction.com; or
 - (b) completing and submitting an "Online Opt Out" via Quinn Emanuel at <https://iagclassaction.com/optout/>
16. If you wish your opt out to be valid and effective, you must complete the Opt Out Form or the Online Opt Out either:
 - (a) by personally signing or personally affixing your electronic signature;



- (b) in the case of a corporation who is a group member, by a director of the corporation personally signing or personally affixing their electronic signature;
 - (c) by your solicitor, personally authorized to act on your behalf, personally signing or personally affixing their electronic signature as your solicitor;
 - (d) in the case of an estate of a group member who is now deceased, by the executor personally signing or personally affixing their electronic signature; or
 - (e) in the case of a person holding a power of attorney for you, by the attorney personally signing or personally affixing their electronic signature and details of the power of attorney.
17. If you opt out of the class action:
- (a) you will not be bound by any order, judgment, or settlement in the class action;
 - (b) you will not be entitled to share in the benefit of any order, judgment, or settlement in the class action; and
 - (c) you may be able to commence separate proceedings against the Defendant on your own behalf provided you issue those proceedings within the time limit applicable to your claim.
18. If you are unsure about how opting out will affect your rights, you should seek independent legal advice about your claim and the applicable time limit prior to opting out.
19. Each Group Member seeking to opt out should fill out a separate Opt Out Form or Online Opt Out.
20. Opt Out Forms or Online Opt Outs received after **4.00pm AEDT on 13 March 2025** will not be accepted without leave of the Court and you will be treated as having not responded to this Notice.

OPTION 3 – DO NOTHING IN RESPONSE TO THIS NOTICE

21. If you do nothing in response to this notice (i.e. neither register, nor opt out), you will remain a Group Member in the class action.
22. The practical implications of doing nothing in response to this Notice are that:
- (a) If a settlement is reached between the Plaintiff and Defendant at any point up until three months after the first day of mediation to be held by 16 May 2025, 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 at any point up until three months after the first day of mediation, to be held by 16 May 2025, 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.

D. FUNDING OF THE IAG SHAREHOLDER CLASS ACTION

23. The Court has made a Group Costs Order (**GCO**) in the proceeding at a rate of 30% inclusive of GST, subject to further order. There are no “out of pocket” expenses for Group Members.
24. Quinn Emanuel is financing all of its legal costs and disbursements in the class action.
25. A GCO is an order of the Court that all legal costs and disbursements payable to Quinn Emanuel be calculated as a percentage of any damages award or settlement sum if the class action is successful – that is, if money is paid by the Defendant to resolve the claims of the Plaintiff and Group Members in the case. This can happen if: (a) the Plaintiff and Defendant settle the case in principle at a mediation and the Court approves the settlement, or (b) through a judgment after the case is heard by the Court in a trial, or otherwise.
26. If the class action is successful, then, subject to any variation of the existing GCO, Quinn Emanuel will be paid 30% (inclusive of GST) of any damages awarded or any settlement sum approved by the Court in accordance with that GCO, and 70% of those damages or that settlement sum will be distributed to Group Members.
27. If the class action is unsuccessful:
 - (a) Group Members will not pay any costs.
 - (b) An adverse costs order cannot not be made against you as a Group Member. In litigation, the Court will typically order the losing party to pay a proportion of the legal costs of the successful party. The effect of the GCO is that, if the class action is unsuccessful, Quinn Emanuel will be liable to pay any costs payable to the Defendant in the proceeding and will not be entitled to recover from the Plaintiff or Group Members any legal costs or disbursements incurred or paid on their behalf in relation to the class action.



E. OTHER MATTERS

28. Please consider the matters addressed in this Notice carefully.
29. If you wish to seek further information about the class action, you can visit Quinn Emanuel's website for the class action: <https://iagclassaction.com/> or the Supreme Court of Victoria website for the class action: <https://www.supremecourt.vic.gov.au/areas/group-proceedings/iag>.
30. If there is any information in this Notice that you are unsure about, or you have any questions or comments about the Notice, you can contact Quinn Emanuel by emailing **iagclassaction@quinnemanuel.com**, or alternatively, by telephone on (02) 9146 3637.
31. You may also seek your own legal advice. You should not delay in making your decision.
32. The Supreme Court should **not** be contacted for legal advice.



SCHEDULE 1

IAG SHAREHOLDER CLASS ACTION

Damian Christopher Norris vs Insurance Australia Group Limited
(S ECI 2022 02887)

OPTION 1: 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**, you must complete an online version of this form at <https://iagclassaction.com/register/> by **4.00pm AEDT on 13 MARCH 2025**, 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 15, 111 Elizabeth Street,
SYDNEY NSW 2000

Email: register@iagclassaction.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 iagclassaction@quinnemanuel.com or phone (02) 9146 3637.

If you want to **opt out** you must complete an Opt Out Notice- See [Option 2 - Opt Out](#).

A. CONTACT / IDENTIFICATION DETAILS

| | | |
|---|---|---|
| What are the details of the person(s), company, self-managed superfund (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 superfund (SMSF) or someone else who is or was a | <input type="checkbox"/> Yes – I'm filling this out on behalf of a company, SMSF or another person or entity who is or was the | <input type="checkbox"/> No – I'm filling this out for myself, and I am or was the owner of, or beneficially entitled to, IAG Shares |



| | | |
|--|---|--|
| holder of IAG Shares? | owner of, or beneficially entitled to, IAG Shares | |
| 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 10 March 2020: | |
|--|--|

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.



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 **4.00 pm (AEDT) on 13 March 2025**:

Post: IAG Shareholder Class Action
Quinn Emanuel Urquhart & Sullivan
Level 15, 111 Elizabeth Street,
SYDNEY NSW 2000

Email: register@iagclassaction.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/>



**SCHEDULE 2
IAG SHAREHOLDER CLASS ACTION**

*Damian Christopher Norris vs Insurance Australia Group Limited
(S ECI 2022 02887)*

OPTION 2: NOTICE OF OPTING OUT BY GROUP MEMBER (OPT OUT FORM)

Only complete this form if you wish to **OPT OUT** of the IAG Shareholder Class Action. If you Opt Out, you will no longer be a Group Member.

To:

Post: IAG Shareholder Class Action
Quinn Emanuel Urquhart & Sullivan
Level 15, 111 Elizabeth Street,
SYDNEY NSW 2000

Email: optout@iagclassaction.com

I, *[print name]*....., am

(select one option only)

- a Group Member;
- a director of *[company]*which is a group member; or
- an Executor for the Estate of *[print name]*which is a group member; or
- a power of attorney for *[print name]*who/which is a group member; or
- a solicitor acting for *[print name]*who/which is a group member

in the above group proceeding, and give notice under section 33J(2) of the *Supreme Court Act 1986* (Vic) that I am **opting out** of this proceeding (if a group member) or on behalf of the group member whom I represent (if I am a representative of that group member).

| | |
|--|--|
| Date: | |
| Signature of group member, director of group member, executor, attorney or solicitor for | |
| Email address of group member or company representative: | |
| Address of Group Member: | |

If you would like to **opt out** of the IAG Shareholder Class Action, please return this opt out form to Quinn Emanuel by email optout@iagclassaction.com OR by post to Level 15, 111 Elizabeth Street, Sydney, NSW 2000 by **4.00pm AEDT on 13 March 2025**.



ANNEXURE B – COVERING EMAIL

Subject: Important Class Action Court Notice – Norris v Insurance Australia Group Limited S ECI 2022 02887

You are receiving this email because you have been identified as a person who may be a Group Member in the IAG Shareholder Class Action. This email contains important information that may affect your legal rights. Please read it carefully and consider your options.

The Court has made orders that:

1. Any person who wishes to participate in any settlement of this class action reached by the parties at any point up until three months after the first day of mediation must complete a registration form by **4:00pm AEDT on 13 March 2025**. You can complete the registration form here <https://iagclassaction.com/register/>; and
2. Any person who does not wish to participate in the class action must opt out of the class action by **4:00pm AEDT on 13 March 2025**.

A copy of the Court approved Opt Out and Registration Notice is available to review here: <https://iagclassaction.com>

The Opt Out and Registration Notice includes information about:

1. how to determine whether you are an eligible Group Member;
2. if you are an eligible Group Member:
 - a. how to register your claim to participate in any settlement reached between the parties in the class action at any point up until three months after the first day of mediation;
 - b. your right to opt out of the class action;
 - c. what happens if you choose to do nothing in response to the Opt Out and Registration Notice.

The deadline to register your claim or opt out of the class action is **4:00pm AEDT on 13 March 2025**.

If there is anything you do not understand in the Opt Out and Registration Notice, or if you have any questions, you may seek independent legal advice or contact Quinn Emanuel by email: iagclassaction@quinnemanuel.com; or phone (02) 9146 3637. Any questions you have concerning the matters contained in the notice should not be directed to the Court.

Kind regards

Quinn Emanuel

