

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: 3 August 2026

ORIGINATING PROCESS: Writ filed 29 July 2022

HOW OBTAINED: On the papers

ATTENDANCE: Not applicable

OTHER MATTERS:

- A. By summons dated 16 April 2026, the plaintiff sought to amend the group member definition in this proceeding (**amendment application**).
- B. On 26 June 2026, the Court made orders approving the amendment application (**orders**).
- C. On 26 June 2026, pursuant to order 1 of the orders the plaintiff filed his amended statement of claim.
- D. 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 THAT:

Pleadings

1. By **4:00 pm** on **14 August 2026**, the defendant file and serve its defence to the amended statement of claim filed on 26 June 2026.
2. By **4:00 pm** on **28 August 2026**, the plaintiff file and serve any reply to the defence to the amended statement of claim.



Form and content of notice

3. Pursuant to ss 33X(4) and 33Y(1) of the *Supreme Court Act 1986* (Vic) (**Act**), the form and content of the following notices and correspondence informing group members about the amendment to the group definition be approved:
 - a. the notice of the amendment to the group definition in Annexure A hereto (**Notice**);
 - b. the covering email for the Notice in Annexure B hereto (**Correspondence**); and
 - c. the abridged notice in Annexure C hereto (**Abridged Notice**).

Distribution of notice of proposed amendment to group member definition

4. Pursuant to s 33Y of the Act, the Notice and the Correspondence be distributed to group members as follows:
 - a. by **7 August 2026 (Notice Date)**, the plaintiff's solicitors (**Quinn Emanuel**) shall send a copy of the Notice by email to those group members who have provided an email to Quinn Emanuel in connection with this proceeding as at the date of these orders, under cover of the Correspondence, save for those persons who have opted out of the proceeding;
 - b. within 5 business days of the Notice Date, Quinn Emanuel shall cause a copy of the Abridged Notice to be published in each of the following newspapers: (i) The Age; and (ii) The Australian Financial Review (online only);
 - c. by the 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 and including the conclusion of the proceeding; and
 - d. 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 and including the conclusion of the proceeding) and made available for inspection at the Civil Registry of the Supreme Court of Victoria (and to remain continuously so available up to and including the conclusion of the proceeding).



Amendments to notice material

5. The materials in Annexures A to C hereto may be amended by Quinn Emanuel before they are given or published 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 Civil Registry and the solicitors for the defendant as soon as practicable.

Costs of giving notice

7. The costs of and incidental to preparation and distribution of the materials in Annexures A to C hereto 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.

Summary statement

8. The plaintiff be granted leave to file an updated summary statement.

Evidence

9. By **4:00 pm** on **9 October 2026**, the defendant file and serve its lay evidence.
10. By **4:00 pm** on **13 November 2026**, the defendant file and serve its expert evidence.
11. By **4:00 pm** on **11 December 2026**, the plaintiff file and serve any lay and expert evidence in reply.

Trial

12. The matter be set down for a three-week trial in the week commencing at **10:30 am** on **15 February 2027**.

Other

13. The proceeding be listed for a case management conference at **9:30 am** on **30 November 2026**.

DATE AUTHENTICATED: 3 August 2026


THE HONOURABLE JUSTICE WATSON



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



IMPORTANT NOTICE

IAG SHAREHOLDER CLASS ACTION

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

Amendment to the Group Member Definition

Why am receiving this notice?

1. The Supreme Court of Victoria has ordered that this notice be published to notify shareholders about a development in the class action affecting who is a group member in the IAG Shareholder Class Action. It is important that you read this notice carefully because it may affect your legal rights.

What is this class action about?

2. This class action relates to allegations that 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 its disclosures in connection with its potential exposure to business interruption claims arising from the COVID-19 pandemic.
3. 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.
4. IAG denies the allegations and is defending the class action.

Group member definition

5. Until recently, group members in the IAG Shareholder Class Action were defined as those persons who:
 - a. during the period 11 March 2020 to 20 November 2020 (inclusive), acquired an interest in, or entered into a contract to acquire an interest in, one or more shares in IAG; and
 - b. suffered loss or damage by reason of the conduct of IAG pleaded in the Statement of Claim; and
 - c. did not fall within one of the exclusions identified in the group definition.
6. In April 2026, the plaintiff applied to amend the group member definition so that the first of these three criteria would specify a narrower acquisition period of **25 June 2020 to 20 November 2020** (inclusive), rather than 11 March 2020 to 20 November 2020 (inclusive). The reason that the plaintiff applied to make this amendment is that, based on documents produced by IAG and expert evidence subsequently filed by the plaintiff, the plaintiff formed the view that there was no longer a basis to allege that IAG engaged in the pleaded contraventions earlier than 25 June 2020.
7. On 26 June 2026, the Court approved the plaintiff's request to make this amendment to the group definition.
8. A copy of the plaintiff's Amended Writ indorsed with his Amended Statement of Claim



(**Amended Claim**), which contains the amended group definition 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>

9. Under the new group member definition, you must have acquired your shares in IAG during the period **25 June 2020 to 20 November 2020** (inclusive). If you purchased your shares in IAG before 25 June 2020 (i.e. in the period 11 March 2020 to 24 June 2020 (inclusive)) and did not purchase any further shares in IAG (i.e. during the later period 25 June to 20 November 2020 (inclusive)), **you are no longer a group member in this class action**. If this applies to you, it means that you are no longer eligible to participate in the IAG Shareholder Class Action.
10. As such, you will not be bound by any judgment made by the Court, or settlement reached between the parties in the class action. This means you may have the right to pursue your own claim against IAG. If you are unsure about your rights, you should seek independent legal advice about your claim and the applicable time limits that may apply.
11. Further, if you remain a group member (i.e. you purchased shares in IAG during the period 25 June to 20 November 2020 (inclusive)), no claim will be advanced in the class action regarding any shares in IAG purchased in the period 11 March 2020 to 24 June 2020 (inclusive). If you wish to pursue any claim regarding shares in IAG purchased in the period 11 March 2020 to 24 June 2020 (inclusive), you should seek independent legal advice about your claim and the applicable time limits that may apply.

Where can I obtain further information?

12. If there is anything in this notice of which you are unsure, you should:
 - a. email the plaintiff's solicitors, Quinn Emanuel at iagclassaction@quinnemanuel.com; or
 - b. seek independent legal advice.
13. 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 3 August 2026.



ANNEXURE B

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

RE: IAG SHAREHOLDER CLASS ACTION – NOTICE ABOUT AMENDMENT TO THE GROUP MEMBER DEFINITION

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

This email has been sent pursuant to Court orders made on 3 August 2026.

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 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.

IAG denies the allegations and is defending the class action.

Group member definition

Until recently, group members in the IAG Shareholder Class Action were defined as those persons who:

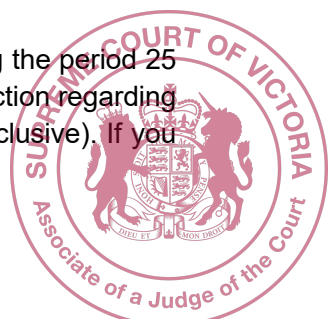
- a. during the period 11 March 2020 to 20 November 2020 (inclusive), acquired an interest in, or entered into a contract to acquire an interest in, one or more shares in IAG;
- b. suffered loss or damage by reason of the conduct of IAG pleaded in the Statement of Claim; and
- c. did not fall within one of the exclusions identified in the group definition.

In April 2026, the plaintiff applied to amend the group member definition so that the first of these three criteria would specify a narrower acquisition period of **25 June 2020 to 20 November 2020** (inclusive), rather than 11 March 2020 to 20 November 2020 (inclusive).

On 26 June 2026, the Court permitted the plaintiff to make this amendment to the group definition.

If you are an IAG shareholder who purchased shares in the period **11 March to 24 June 2020 (inclusive)**, and did not purchase shares during the later period 25 June to 20 November 2020 (inclusive), you are no longer a group member of this class action. As such, you will not be bound by any judgment, or settlement reached in this proceeding. If this applies to you, you may have the right to pursue your own claim against IAG provided you issue proceedings within the time limit applicable to your claim. If you are unsure about your rights, you should seek independent legal advice about your claim and the applicable time limits.

Further, if you remain a group member (i.e. you purchased shares in IAG during the period 25 June to 20 November 2020 (inclusive)), no claim will be advanced in the class action regarding any shares in IAG purchased in the period 11 March 2020 to 24 June 2020 (inclusive). If you



wish to pursue any claim regarding shares in IAG purchased in the period 11 March 2020 to 24 June 2020 (inclusive), you should seek independent legal advice about your claim and the applicable time limits that may apply.

A copy of the notice is available at <https://iagclassaction.com/>. The notice provides details about the amendment to the group member definition, why it was made and who it affects.

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



ANNEXURE C

IMPORTANT LEGAL NOTICE

IAG SHAREHOLDER CLASS ACTION

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

NOTICE ABOUT AMENDMENT TO THE GROUP MEMBER DEFINITION

This notice contains important information that may affect your legal rights. Please read it carefully and consider your options.

The Claim

The IAG Shareholder Class Action alleges that in 2020, IAG engaged in misleading or deceptive conduct and failed to comply with its continuous disclosure obligations as an ASX listed company, contraventions relevant provisions of the *Corporations Act 2001* (Cth), the *ASIC Act 2001* (Cth) and the Australian Consumer Law. IAG denies the allegations and is defending the class action.

Amendment to the group member definition

Until recently, group members in the IAG Shareholder Class Action were defined as those persons who:

- (a) during the period 11 March 2020 to 20 November 2020 (inclusive), acquired an interest in, or entered into a contract to acquire an interest in, one or more shares in IAG;
- (b) suffered loss or damage by reason of the conduct of IAG pleaded in the Statement of Claim; and
- (c) did not fall within one of the exclusions identified in the group definition.

In April 2026, the plaintiff applied to amend the group member definition so that the first of these three criteria would specify a narrower acquisition period of **25 June 2020 to 20 November 2020** (inclusive), rather than **11 March 2020 to 20 November 2020** (inclusive).

On 26 June 2026, the Court permitted the plaintiff to make this amendment to the group definition.

If you are an IAG shareholder who purchased shares in the period **11 March to 24 June 2020 (inclusive)**, and did not purchase shares during the later period 25 June to 20 November 2020 (inclusive), you are no longer a group member of this class action. As such, you will not be bound by any judgment, or settlement reached in this proceeding. If this applies to you, you may have the right to pursue your own claim against IAG provided you issue proceedings within the time limit applicable to your claim. If you are unsure about your rights, you should seek independent legal advice about your claim and the applicable time limits.

Further, if you remain a group member (i.e. you purchased shares in IAG during the period 25 June to 20 November 2020 (inclusive)), no claim will be advanced in the class action regarding any shares in IAG purchased in the period 11 March 2020 to 24 June 2020 (inclusive). If you wish to pursue any claim regarding shares in IAG purchased in the period 11 March 2020 to 24 June 2020 (inclusive), you should seek independent legal advice about your claim and the applicable time limits that may apply.

A full copy of the notice is available at <https://iagclassaction.com>.

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.

