NOTICE OF FILING

Details of Filing

Document Lodged:	Defence - Form 33 - Rule 16.32
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	29/07/2026 3:48:05 PM AEST
Date Accepted for Filing:	29/07/2026 3:48:07 PM AEST
File Number:	NSD1039/2021
File Title:	WHITE OAK COMMERCIAL FINANCE EUROPE (NON-LEVERED) LIMITED v INSURANCE AUSTRALIA LIMITED ACN 000 016 722
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.

Filed pursuant to Order of Thawley J dated 21 July 2026

BCC/TMNF/TMMA Annexure B

No. NSD 1039 of 2021

Federal Court of Australia

District Registry: New South Wales

Division: General

WHITE OAK COMMERCIAL FINANCE EUROPE (NON-LEVERED) LIMITED

Applicant

INSURANCE AUSTRALIA LIMITED (ACN 000 016 722) and others named in the Schedule

First Respondent

Filed on behalf of (name & role of party) BCC Trade Credit Pty Ltd, Second Respondent and Cross-claimant; Tokio Marine & Nichido Fire Insurance Co., Ltd. (ARBN 000 438 291), Sixth Respondent and Cross-claimant; and Tokio Marine Management (Australasia) Pty Ltd (ACN 001 488 455), Seventh Respondent and Cross-claimant

Prepared by (name of person/lawyer) Matt Andrews

Law firm (if applicable) Kennedys (Australasia) Partnership

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[Form approved 01/08/2011]

Schedule

No. NSD 1039 of 2021

Federal Court of Australia
District Registry: New South Wales
Division: General

Respondents

Second Respondent:	BCC Trade Credit Pty Ltd (ACN 608 296 233)
Third Respondent:	Greg Brereton
Fourth Respondent:	Greensill Bank AG
Fifth Respondent:	Dr Michael C. Frege in his capacity as Insolvency Administrator of Greensill Bank AG
Sixth Respondent:	Tokio Marine & Nichido Fire Insurance Co., Ltd. (ARBN 000 438 291)
Seventh Respondent:	Tokio Marine Management (Australasia) Pty Ltd (ACN 001 488 455)

GREENSILL BANK CROSS-CLAIM

First Cross-claimant:	Greensill Bank AG
Second Cross-claimant:	Dr Michael C. Frege in his capacity as Insolvency Administrator of Greensill Bank AG
Cross-respondent:	Insurance Australia Limited (ACN 000 016 722)

BCC CROSS-CLAIM

Cross-claimant:	BCC Trade Credit Pty Ltd (ACN 608 296 233)
First Cross-respondent:	Greensill Capital (UK) Limited
Second Cross-respondent:	Greensill Capital Pty Limited (In Liquidation) (ACN 154 088 132)

BCC/TMNF/TMMA CROSS-CLAIM

First Cross-claimant:	BCC Trade Credit Pty Ltd (ACN 608 296 233)

Second Cross-claimant:	Tokio Marine & Nichido Fire Insurance Co., Ltd. (ARBN 000 438 291)
Third Cross-claimant:	Tokio Marine Management (Australasia) Pty Ltd (ACN 001 488 455)
Cross-respondent:	Insurance Australia Limited (ACN 000 016 722)

ANNEXURE B

This Annexure B has been prepared for the purposes of supplementing the defences filed by BCC, TMNF and TMMA (being the Second, Sixth and Seventh Respondents respectively) in the White Oak Proceeding (NSD 1039 of 2021) (**Proceeding**).

A	B	C	D	E	F	G	H
Due date	**Maturing investor note(s) ISIN and investor**	**Maturing investor note(s) amount (USD)**	**Shortfall following retention from trade**	**Shortfall following retention from trade (as recorded on GCUK Accounts)**	**Purported customer payment obligation reference**	**Purported customer**	**SAAI date**
9 April 2019	XS1881675604 (GBAG)	10,976,564	10,976,565.87	10,976,566	400891222-15124-FMV	Arcelormittal Sourcing SCA	26 April 2019
					370111431-15125-FMV	Aperam Sourcing SCA	
	XS1881675430 (GBAG)				595541186-GS031-FMV	Trafigura Pte Ltd	
23 April 2019	XS1881675943 (CS)	9,591,295.00	1,832,919.26	1,832,919	370111431-15134-FMV	Aperam Sourcing SCA	10 May 2019
7 May 2019	XS1881676321 (GBAG)	31,625,418	1,301,463.99	1,301,464	378856637-GS0051-FMV	Ugitech SA	21 May 2019

					315000430-GS0050-FMV	Aktien-Gesellschaft der Dillinger Huttenwerke	
	XS1881676834 (CS)				595541186-GS0049A-FMV	Trafigura Pte Ltd	
					595541186-GS0049B-FMV	Trafigura Pte Ltd	
					595541186-GS0049C-FMV	Trafigura Pte Ltd	
14 May 2019	XS1881676750 (GBAG)	32,518,294	723,536.67	723,537	378856637-GS0052-FMV	Ugitech SA	29 May 2019
	XS1881676917 (CS)				595541186-GS053A-FMV	Trafigura Pte Ltd	
					595541186-GS053B-FMV	Trafigura Pte Ltd	
					595541186-GS053C-FMV	Trafigura Pte Ltd	
					595541186-GS053D-FMV	Trafigura Pte Ltd	
					595541186-GS053E-FMV	Trafigura Pte Ltd	

21 May 2019	XS1881677055 (CS)	48,154,748	1,417,859.60	1,417,860	006249189-GS054A-FMV	Cargill Incorporated	6 June 2019
					006249189-GS054B-FMV	Cargill Incorporated	
	XS1881677303 (GBAG)				218492974-GS055-FMV	Aar Tee Commodities (Uk) Ltd	
	XS1881677568 (CS primary, GBAG secondary)				368445920-GS056A-FMV	Outokumpu Oyj	
					368445920-GS056B-FMV	Outokumpu Oyj	
					368445920-GS056C-FMV	Outokumpu Oyj	
	XS1881677998 (GBAG)				321074163-GS057A-FMV	Thyssenkrupp Materials Trading GmbH	
					321074163-GS057B-FMV	Thyssenkrupp Materials Trading GmbH	
					321074163-GS057C-FMV	Thyssenkrupp Materials Trading GmbH	
4 June 2019	XS1881678020(GBAG)	18,268,996	169,582.31	169,582.30	316247113-15607-FMV	DILLINGER HUTTE SAARSTAHL AG	18 June 2019
	XS1881678293 (GBAG)				378856637-15606-FMV	UGITECH SA	

18 June 2019	XS1881679184 (GBAG)	5,183,095	153,629.73	153,630	552597742-15375-FMV	Gulf Petrochem FZC	2 July 2019

Date: 29 July 2026



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Signed by Raylee Joy Hartwell as partner of
Matt James Andrews, Lawyer for the
Second, Sixth and Seventh Respondents

This annexure was prepared by Peter Braham SC, Justin Williams SC, James Hutton SC, Julie Granger, Jerome Entwisle, Daniel Reynolds, Stephen Thomson and Christopher Beshara of counsel.

Certificate of lawyer

I, Raylee Joy Hartwell, certify to the Court that, in relation to the Annexure filed on behalf of the Second, Sixth and Seventh Respondents, the factual and legal material available to me at present provides a proper basis for:

(a) each allegation in the pleading; and

(b) each denial in the pleading; and

(c) each non admission in the pleading.

Date: 29 July 2026



……..

Signed by Raylee Joy Hartwell as partner of
Matt James Andrews, Lawyer for the Second,
Sixth and Seventh Respondents

Schedule

No: NSD 1039 of 2021

Federal Court of Australia
District Registry: New South Wales
Division: General

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Cross-respondent:	Insurance Australia Limited (ACN 000 016 722)

IAL CROSS-CLAIM

Cross-claimant:	Insurance Australia Limited (ACN 000 016 722)
First Cross-respondent:	Tokio Marine & Nichido Fire Insurance Co., Ltd. (ARBN 000 438 291)
Second Cross-respondent:	Tokio Marine Management (Australasia) Pty Ltd (ACN 001 488 455)
Third Cross-respondent:	BCC Trade Credit Pty Ltd (ACN 608 296 233)