NOTICE OF FILING

Details of Filing

Document Lodged:	Reply - Form 34 - Rule 16.33
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	7/09/2026 4:11:56 PM AEST
Date Accepted for Filing:	7/09/2026 4:12:08 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.

Form 34
Rule 16.33

Reply to the BCC/TM Parties' Annexure B

No. NSD1039/2021

Federal Court of Australia

District Registry: New South Wales

Division: Commercial and Corporations National Practice Area (Insurance List)

White Oak Commercial Finance Europe (Non-Levered) Limited

Applicant

Insurance Australia Limited ACN 000 016 722 and others named in the Schedule

Respondents

In reply to the BCC/TM Parties' Annexure B filed on 29 July 2026, and adopting the capitalised terms contained in the Sixth Amended Statement of Claim filed by the applicant on 9 July 2026, the applicant repeats paragraph 5 of its Reply to the BCC/TM Parties' Defences and further:

1. Says if and to the extent there was any 'rolling' or 'rollover' of debts (which is not admitted):

   (a) all debts the subject of the table were repaid to the relevant investor in full; and

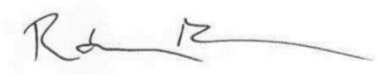
   (b) otherwise repayment occurred as a result of an agreement or arrangement as between GCUK and GCUK's customers, which did not involve White Oak.

Filed on behalf of (name & role of party) White Oak Commercial Finance Europe (Non-Levered) Limited, Applicant
Prepared by (name of person/lawyer) Rehana Box
Law firm (if applicable) Ashurst Perkins Coie
Tel +61 2 9258 6407 Fax +61 2 9258 6999
Email Rehana.box@ashurstperkins.com
Address for service (include state and postcode) Level 8, 39 Martin Place, Sydney NSW 2000

2. Denies column H of the table.

3. Otherwise does not know and therefore cannot admit the balance of the content of the table.

Date: 7 September 2026



Signed by Rehana Box

Lawyer for the Applicant

This pleading was prepared by Rehana Box and Rani John, lawyers, and by Julian Sexton, Tom O'Brien, Jocelyn Jaffray, Harry Rogers, Matthew Youssef and Katrina Woodforde of counsel.

Certificate of lawyer

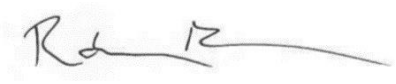
I, Rehana Box, certify to the Court that, in relation to the reply filed on behalf of the Applicant, the factual and legal material available to me at present provides a proper basis for:

(a) each allegation in the pleading;

(b) each denial in the pleading; and

(c) each non admission in the pleading.

Date: 7 September 2026



Signed by Rehana Box

Lawyer for the Applicant

Schedule

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 Frege
Sixth Respondent:	Tokio Marine & Nichido Fire Insurance Co Ltd. ACN 000 438 291
Seventh Respondent:	Tokio Marine Management (Australasia) Pty Ltd ACN 001 488 455, of Level 17, 60 Margaret Street, Sydney NSW 2000