

Exhibit 16 – New Program

Zenith Insurance Company is submitting this filing to introduce a new commercial auto program which we believe will provide more options to California consumers. The new program is targeted to non-agricultural risks and is distinct from Zenith’s existing commercial auto program that serves the agriculture and farming industry. In subsequent commercial auto filings, we will identify the two programs as follows:

- Commercial Auto (Farm and Agribusiness)
- Commercial Auto (Other than Farm and Agribusiness)

There are no existing policyholders affected, and the Commercial Auto (Farm and Agribusiness) program is unchanged by this filing. The attached Mutually Exclusive Guidelines have been created to determine which program would apply to a risk.

Most of the forms for Commercial Auto (Other than Farm and Agribusiness) are standard ISO forms. They are currently used in Commercial Auto (Farm and Agribusiness) program. Because this is a new program with no experience data, the rates and rules were developed largely based on the current Commercial Auto (Farm and Agribusiness) program (#25-365) and the latest ISO manuals cited below, supplemented by competitive analysis and the judgement of our underwriting and actuarial staff. We will monitor emerging experience and submit actuarially indicated adjustments when appropriate. To the best of our knowledge and information, the proposed rates are not excessive, inadequate, or unfairly discriminatory.

ISO Manuals Referenced:

ISO Manual Description	CDI Filing Number	SERFF Tracking Number
CA-CA-2025-RU-003	24-1208	ISOF-G134118720
CA-CA-2026-OCPLC-001	24-451	ISOF-134026386
CA-CA-2024-OCPRU-001	21-1737	ISOF-132889569