

From: Rodric Williams <[REDACTED]>
To: Lucy Bremner <[REDACTED]>
Cc: Jonathan Gribben <[REDACTED]>, Andrew Parsons <[REDACTED]>
Subject: RE: Private & Confidential re: Post Office Group Litigation - Request for Documents - SUBJECT TO LEGAL PRIVILEGE [WBDUK-AC.FID27032497]

Date: Mon, 12 Nov 2018 23:31:18 +0000

Importance: Normal

Inline-Images: image001.png; image003.png; image004.png; image005.png

Thanks Lucy – I'll send to RM, cc'ing Johan Appel, and fwd you a copy once sent. Please liaise with Johan (who may want to update our CoSec) tomorrow to keep this moving.

Thanks again, Rod

From: Lucy Bremner <[REDACTED]>
Sent: 12 November 2018 23:26
To: Rodric Williams <[REDACTED]>
Cc: Jonathan Gribben <[REDACTED]>, Andrew Parsons <[REDACTED]>
Subject: RE: Private & Confidential re: Post Office Group Litigation - Request for Documents - SUBJECT TO LEGAL PRIVILEGE [WBDUK-AC.FID27032497]

Rod,

Thanks for this. I have made some minor amends, as follows:

I have amended the words "2011 audit report" to read "2011 management letter" in line with the description on the front of the 2011 E&Y document; and

I have added "and that further work would be carried out on this" at bullet point four, in line with what it says in the management comments in the 2011 E&Y document.

Kind regards,

Lucy

Lucy Bremner

Associate

Womble Bond Dickinson (UK) LLP



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From: Rodric Williams

GRO

Sent: 12 November 2018 23:03

To: Lucy Bremner

Cc: Jonathan Gribben; Andrew Parsons

Subject: Private & Confidential re: Post Office Group Litigation - Request for Documents - SUBJECT TO LEGAL PRIVILEGE

Lucy – please see my proposed email to Royal Mail below and let me know if any changes need to be made to reflect properly the requests for documents.

Thanks, Rod

Private & Confidential - SUBJECT TO LEGAL PRIVILEGE - Sent in Connection with the Post Office Group Litigation

Luke,

Following our telephone call on Friday, Post Office Ltd is trying to locate:

a 2010 Ernst & Young management letter; and/or

Royal Mail Group Audit Committee or Audit, Risk & Compliance Committee (ARC) minutes for 2010/2011.

These audit-related documents are sought to assist our preparations for the Post Office Group Litigation “Horizon Issues” trial. That trial will take place in March 2019 to determine (primarily on expert evidence) technical issues concerning the Horizon IT system used to record transactions in Post Office branches.

By way of context:

- In his report filed on 16 October 2018, the Claimants' expert Jason Coyne refers to issues with Credence (a back office accounting system which uses Horizon data) to support his conclusion that


Horizon may not be reliable.

- The Credence issues are mentioned in EY's 2011 management letter (disclosed in the Group Litigation) and concern weak change controls and a lack of documentation to approve fixes and patches.
- To address the Credence issues, EY recommended that Post Office require its IT provider Logica to segregate the roles of developer and implementer, maintain complete and accurate records of any changes, and periodically audit the achievement of service level agreements.
- EY's 2011 management letter notes that in 2010 Post Office management stated that Logica had been asked to comply with EY's recommendations and ensure appropriate role separation and that further work would be carried out on this, hence our request for the 2010 Ernst & Young management letter.
- The 2011 audit report did not however comment on whether the issues had been fully addressed as this particular issue was not within scope.
- We are therefore trying to determine whether any other audit-related documents disclose whether these issues were addressed and if so how, hence our request for Royal Mail Group Audit Committee or Audit, Risk & Compliance Committee (ARC) minutes for 2010/2011 which may address this issue.

I hope that clarifies our request. Please let me know if not.

We are unfortunately running on a very tight timetable, so any prompt attention you could provide to this would be very much appreciated so that if appropriate, disclosure can be made as soon as possible this week. I do of course apologise for the short notice.

With thanks and kind regards,



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Rodric Williams
Head of Legal - Dispute Resolution & Brand

20 Finsbury Street
London EC2Y 9AQ

T: **GRO**
E:

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