

Message

From: Rodric Williams [GRO]
Sent: 18/10/2019 16:22:15
To: Andrew Parsons [GRO]; Emanuel, Catherine [GRO]
CC: Sherrill Taggart [GRO]; Kenneth Garvey [GRO]
Subject: RE: GLO Board Actions Table update

Thanks – I've spoken to Kate.
We'll dial in at 630pm.
Rod

From: Andrew Parsons [mailto: [GRO]
Sent: 18 October 2019 17:21
To: Rodric Williams [GRO]; Emanuel, Catherine [GRO]
Cc: Sherrill Taggart [GRO]; Kenneth Garvey <Ke [GRO]
Subject: RE: GLO Board Actions Table update

Rodric

As discussed - dial in details. Let me know when to dial in.

Join by phone

[GRO] (UK) English (United Kingdom)
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Conference ID: 6540138

A

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

d: [GRO]
m: [GRO]
t: [GRO]
e: [GRO]

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From: Rodric Williams [GRO]
Sent: 18 October 2019 17:05
To: Emanuel, Catherine [GRO]; Andrew Parsons [GRO]
Cc: Sherrill Taggart [GRO]; Kenneth Garvey [GRO]
Subject: RE: GLO Board Actions Table update

Apologies - resending as I should have copied Sherrill and Ken (now cc'ed).

From: Rodric Williams

Sent: 18 October 2019 17:02

To: Emanuel, Catherine [GRO]; andrew.parsons [GRO]

Subject: FW: GLO Board Actions Table update

Andy, Kate – pls see the below re the attached.

Can we please have a call asap on how to take this forward (with one of you please to offer the dial in details!)?

Thanks, Rod

From: Ben Foat

Sent: 18 October 2019 16:48

To: Rodric Williams

Cc: Kenneth Garvey [GRO]

Sherrill Taggart [GRO]

Subject: Re: GLO Board Actions Table update

Thanks Rod.

We need to go quicker in the KELS analysis. It can not take several weeks - board will not accept that and that was not the original timetable so again resource management- can HSF assist to get this done urgently. The exam question is what would it take to get all of it done by next week. Also there is no explanation for saying it would be completed by the end of this week when only 690/14000 has been done. Please escalate to the highest levels at WBD and HSF.

Also we need the answer to the scope question. The report just leaves it that there is a risk and we will continue to work in the scope. We have reported that we are working on the scope now for two weeks. We have to say what is the scope that would diminish the risk. Again, it doesn't address what I have asked for. Can you please take it back to WBD but also HSF. I'm not sensing the urgency that the GE and Board has on this issue coming through.

I would expect a fairly strong negative reaction in its current form. Do you not agree ?

Can WBD and HSF urgently address my concerns and send it to me by tomorrow morning and then it must go to Board. It's already now over due.

Kind regards

Ben

Ben Foat

General Counsel

Post Office Limited

[GRO]

From: Rodric Williams [GRO]

Sent: Friday, October 18, 2019 4:37:22 PM

To: Ben Foat [GRO]

[GRO]

Cc: Kenneth Garvey <[REDACTED]>, Sherrill Taggart <[REDACTED]>
Subject: FW: GLO Board Actions Table update

Ben,

KEL Board Actions Table: We have sought with WBD's assistance to address your feedback in a revised the Actions Table, tracking the changes made – see link below:

GRO

Updated GLO Board Report: Having spoken to Kate Emanuel, HSF have been instructed to update the draft GLO Board Report as per your direction and timings.

Please let me know if you have any comments or require anything further.
Rod

From: Ben Foat
Sent: 17 October 2019 21:17

To: Kenneth Garvey <[REDACTED]>
Cc: Rodric Williams <[REDACTED]>, Sherrill Taggart <[REDACTED]>
Subject: RE: GLO Board Actions Table update

Hi Ken / Rod

Thanks for this update but I think it needs some work – ie incorporating Andy's email re the audit. Also, the section 2 and 3 don't really align. Can we get a clearer statement on how many previous KELS did we find, how many have been analysed now, how many to go, how many bad ones (ie category 4 and 5) and how they would impact the outcome of a trial (ie WBD need to be able to say whether given the content of the KELS its likely the court will reconvene and that the experts should have an opportunity to consider – if they cant/wont then just go to HSF to ensure our instructions are being followed.

Can someone do an executive summary of counsel's advice. We need to do an audit – this goes beyond GLO but POL actually having operational oversight over it most material outsourced arrangement so we need to understand the solution to this (is it the scope or a timing issue) but politically that advice will not land well with the Board so we need to manage it.

Rod – as Ken is now on leave, I think you will need to do the above or have someone of the externals or secondees support. I need to update the Board tomorrow.

We also need to work on the Group Litigation Board paper – you need to send it across to HSF to amend in light of the meeting that occurred at HSF today and to ensure that reflects the actions in that meeting. I suggest you speak to Kate Emmanuel. It would be helpful if the paper set out (a) mediation process explaining tactical decisions (ie there is a difference to asking them to authorise settlement up to £45m does not mean that we go in and offer that amount in our first offer) (b) in a simple timeline, the milestones. By way of illustration:

- Board subcommittee x
- Board meeting 29/10
- Horizon judgment 1/11- onwards
- Permission to Appeal CIJ Hearing 12/11
- Board Subcommittee approving settlement authority range x
- BEIS authority?
- Mediation 25/26?

Make sure that we only seeking the board's permission to note the approach and to delegate/authorise the board subcommittee to authorise the GC to make a settlement on the terms determined by the Board Subcommittee.

I will need to see that finalised paper on Monday morning (as papers are due COB Monday)

Kind regards
Ben



Ben Foat
Group General Counsel
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Mobile : [GRO]

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From: Kenneth Garvey

Sent: 17 October 2019 17:37

To: Ben Foat <[GRO]>

Cc: Rodric Williams <[GRO]> Sherrill Taggart <[GRO]>

Subject: GLO Board Actions Table update

Legally Privileged and Confidential

Hi Ben

Please see attached draft update for this week for the Board on the KELs issue. I understand that our CEO had a call with the Fujitsu Europe SVP, but I don't know what the outcome of that call was so I have suggested in the update for item 1 that the CEO will update the Board directly.

Table attached both as a Sharepoint link and separate word doc for convenience.

GRO

I am on leave tomorrow, but please do call me if you have any queries on this (07764943488). I understand Rod will be WFH tomorrow if you need him.

Thanks
Ken

Kenneth Garvey
Head of Legal, IT and Procurement



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M: **GRO**



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