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Post Office Limited Postmaster Litigation Subcommittee

MINUTES OF A MEETING OF THE POSTMASTER LITGATION SUBCOMMITEE OF POST OFFICE LIMITED (THE "COMPANY" OR "POL") ON MONDAY 24 SEPTEMBER 2018 AT 16.00 AT 20 FINSBURY SREET, LONDON EC2Y 9AQ

Present: Tim Parker Chairman (**TP**)

Paula Vennells Chief Executive (PV)

Ken McCall Senior Independent Director (KM)

Tom Cooper Non-Executive Director (TC)

Alisdair Cameron Chief Financial and Operations Officer (AC)

In Attendance: Jane MacLeod General Counsel & Company Secretary (JM)

Veronica Branton Minute Secretary (VB)

Andy Parsons Partner, Womble Bond Dickinson (AP)

Angela Van-Den-Bogerd Network Change Operations Manager (A VDB)

Rodric Williams Head of Legal: DR & Brands (RW)

Mark Underwood Head of Portfolio: Legal, Risk & Governance (MU)

Apologies: None

These minutes contain legally privileged information

1. Welcome and Conflicts of Interest

ACTION

There were no new declarations of conflicts of interest.

2. Minutes

The minutes of the meeting held on 10 July 2018 were **APPROVED**.

3. Update on Common Issues (Verbal)

Jane MacLeod reported that:

- we had asked for inadmissible evidence to be struck out
- we had been successful in our application for costs
- we had received information how court time would be allocated in November 2018. Witness statements would not be read out in court, and the Judge would go straight to cross examination.

4. Update on Horizon (Verbal)

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• The Horizon trail would start in March 2019 and 20 days had been allocated. The themes for the trial have been agreed, including the robustness of the system, remote access and the facilities available to PMs. The Judge would have 15 questions to answer on the Horizon system, the outcome from which would be on a spectrum rather than a simple determination on whether or not it was a robust system. The Judge was having to take a view on how the Horizon system had operated in the past and the Trial outcomes would be a question of fact and not law. We faced the challenge of explaining the Horizon system in a plain English way and the Judge would have to choose between the two experts' views. The experts would be in constant dialogue in advance of the Trial and their primary duty was to the Judge. Our expert's view was that Horizon was a robust system which had some "bugs" but which did not have a material impact on the operation of the system.

5. Contingency Planning (including communications strategy) (verbal)

- Mark Davies advised the Subcommittee that a team would be monitoring press and communication in advance of the trial, including social media. Lines were in place for the media. We were preparing for different scenarios and would be briefing senior leaders internally and key external stakeholders and partners, particularly UKGI and BEIS.
- Portland were our media advisers and were assessing our approach from an external perspective; they would be available day-to-day during the trial. Portland understood the issues and had worked with us in the past and understand the issue.
- The media strategy was discussed and the Subcommittee wanted to be sure that we were getting the right external communications advice. It was AGREED that the Communications Plan would be circulated to the Subcommittee.

MD

- Lawyers from UKGI were being briefed but we also had a briefing with the Minister and Permanent Secretary at BEIS on 17 October 2018.
- An update was received on contingency planning.

Chairman	Date