

Dear Henry,

STRICTLY PRIVATE AND CONFIDENTIAL

Please see email / letter below, which my lawyer has today sent through to Nick Read and Ben Foat.

I would be grateful if you and I could have a discussion, probably best to do this off the record. There are a number of matters, which are not directly related to this, but are part of the poor leadership 'culture' within PO which I feel needs to be brought to your attention.

As you know, I joined POL because I wanted to make the changes needed, and as a priority to build trust and create a culturally healthy organisation (aside from ensuring we deliver the system and commercial solutions for a strong sustainable business). I joined with extensive experience, enthusiasm and desire to drive the necessary change. Unfortunately, from early days I have been distracted and/or prevented from delivering the critical objectives of my role, by self-created day to day dramas, poor judgement, self-interested individuals and/or, I have to say it, incompetence. I am not at all confident that these critical 'human' matters are being addressed and that POL continues to perpetuate a terrible leadership culture. I am becoming very worried about the neglect of the business and the impact this is having on our people and all this is happening under my watch, yet I am unable to influence it.

I have been raising matters over the course of 6 months, which when raised, receive a lot of verbal acknowledgement, but nothing has changed or is being resolved. Given the recent investigations that POL has been subject to, I believe that many of the issues would constitute protected disclosures and therefore it is important I speak to you. I am concerned that having made disclosures to Nick, I am now being treated less favourably, not least by the way in which the investigation against me is being carried out. I am also keen to gain your steer on how to manage these matters, as I do not want to alienate Nick. These centre on:

1. A number of significant leadership behaviour issues and poor performance raised over the last few months which are being ignored and/or not being fixed
2. Poor management of public money and spending
3. Feedback on NBIT, leadership, costs, ability to deliver and lack of governance
4. Remco non-compliance (ie failure to declare conflicts of interest)
5. The imbalance in POL between trust/accountability versus the significant levels of bureaucracy/the role of legal and the way we manage investigations
6. Significant contractual, policy and conduct breaches
7. The cultural transformation and unwillingness to activate change
8. The extremely poor internal engagement and communications and unwillingness to champion the changes needed to address the concerns raised by our colleagues and post masters
9. The chaotic /tactical day to day drama of the business v long term strategic and commercial agenda
10. Failure to focus our efforts on Post masters, rebuild trust and respond to their feedback

I know that you will have a lot on at the moment, but I would be grateful for a call and/or if we could meet face to face soon, at your convenience, so I can elaborate on the above points. Please let me know where and when suits you.

Best regards,
Jane

Private and confidential
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Your reference:

Our reference: BRS/4058959-0001 Document number: 259236625_1

Direct line: [REDACTED] richard.santy@[REDACTED]
23 May 2023

Sent by email only to: Nick.Read1 [REDACTED] and Ben.Foat [REDACTED]

Dear Sirs

Our client: Jane Davies

As you know, we have been instructed by the above in relation to the ongoing investigation of bullying and conduct allegations made against our client.

We understand that you will have seen the comprehensive document that our client has submitted to Simon Stephen which outlines not only the arguments which refute these allegations, but it is also supported by significant email/correspondence & evidence which demonstrates that our client was a) brought into an difficult cultural environment where not just the HR team, but members of the SLG/GE, CEO/CFO were not working effectively b) that during the course of her interactions with the complainants, she had the full backing and steer from the Group CEO, Nick Read and that she acted with integrity and respect when dealing with these individuals.

We believe it is important to keep in mind the context in which such allegations have been raised against our client. Our client was brought into the Group Chief People Officer role to drive behaviour and cultural transformation but feels she has been under attack from the outset by a group of individuals who had not previously been directed or managed appropriately and were resistant to such change. Our client feels that the Company supporting the previous interim Chief People Officer, Angela Williams, and allowing her to stay in a part-time executive position (whilst holding down another full-time executive position) is a fundamental reason why matters have reached the position they are currently in.

We are concerned that the investigation into our client is ongoing almost 4 months after our client understands that an initial allegation was raised against her; especially given the unsubstantiated nature of such allegations. As you will appreciate, our client is finding it difficult and demoralising having this set of allegations hanging over her, especially given her level of experience and unblemished record to date in her career. For these allegations to linger unresolved for such a period is affecting our client's [REDACTED] and eroding the level of trust and confidence she has in the Company. Our client has developed concerns over the motivation behind the way this is being dealt

with and whether it is in any way linked to issues she has previously raised with the CEO.

In respect of the investigation, our client would like to specifically flag the following:

1. The allegations of breach of policy, unilateral decision making, bullying and intimidation are unsubstantiated and undermined by the evidence. Having read the documentation available, we would suggest that the evidence indicates that these allegations have been fabricated or made up by the individuals raising them.
2. The evidence suggests that the individuals who have raised the unsubstantiated allegations are working collectively in this respect and as such are demonstrating bullying and intimidation behaviour towards our client, not the other way round.
3. Our client's attempts to manage her team have met significant resistance. Our client has noted that her team perceive normal management practices as 'being performance managed', 'being managed out of the business' or 'intimidated'. Our client is managing very senior leaders, and is simply trying to do her job of managing them in line with her and her manager's expectation.
4. We note that there are two letters/emails from [REDACTED] **IRRELEVANT** referenced in the Terms of Reference, yet our client has only seen the first one of these, where [REDACTED] resigned and alleged 'intimidation'. We understand that in the second email (which we presume was sent to the Group CEO), [REDACTED] strengthened [REDACTED] allegations and focused such allegations on bullying etc. We are concerned that our client has not seen this second email at this stage in the investigation, nor does there appear to be clarity around why [REDACTED] chose to alter the focus of the allegations in this second email.
5. Our client understands that [REDACTED] completely deleted all of [REDACTED] files from [REDACTED] PC, yet [REDACTED] was still able to hold a team meeting to update the team on [REDACTED] resignation position on 3 February 2023. Our client believes that this evidences a level of pre-planning. Our client however was incredibly upset at the end of that meeting as evidenced.
6. Our client notes that [REDACTED] obtained a new role quickly following the termination of [REDACTED] employment with the Company, which we would suggest demonstrates that [REDACTED] was not as affected by the alleged situation as much as complained of, if at all.
7. Our client still is unaware of who specifically has made the allegations against her and is keen to receive an answer to this point.
8. [REDACTED] has indicated to our client that [REDACTED] is keen to meet with our client to agree his return to work as [REDACTED] states [REDACTED] is feeling much better. A meeting to this end has been arranged for this week. Our client would say that, if [REDACTED] felt the need to put a formal complaint in against our client and our client's alleged treatment of [REDACTED] it is surprising that [REDACTED] is able to return now despite the fact that the investigation remains ongoing. We have suggested to our client that in the current circumstances she should not be the one to meet [REDACTED]. We would suggest therefore that the Company make alternative arrangements to meet with [REDACTED] to discuss [REDACTED] return to work.

You will be aware that our client has been signed off of work for two weeks, [REDACTED] **GRO** caused by the ongoing investigation. It has been recommended to her that she

receives [GRO] Given our client's [GRO]
absence has been caused by the Company's conduct of the investigation, our client would anticipate
that the Company would procure [GRO] for our client. Can you please confirm that this is
the case and contact our client directly in order to make arrangements in this respect?
Ultimately, having reviewed the comprehensive evidence that our client has submitted as part of the
investigation and having seen the lack of tangible evidence presented by the complainants, our view
is that there is clearly no disciplinary case for our client to answer. We would therefore like to
understand when our client will receive confirmation that the investigation into the allegations has
concluded and no disciplinary action will be taken against her.

We look forward to hearing from you regarding the above as soon as possible.

Yours faithfully
Mills & Reeve LLP

Sent from my iPad