

From: Rodric Williams
To: Andrew Parsons
Subject: RE: Statement [WBDUK-AC.FID26896945]
Date: Thu, 23 Aug 2018 23:26:41 +0000

GRO

Importance: Normal

Attachments: FINAL_DACB_Letter_to_VOA_20.06.13.PDF;
Signed_Witness_statement_of_Rob_Scott_dated_27_October_2016.pdf; RFS1.pdf;
SF1.pdf;
Witness_statement_of_Sean_Farrow_dated_27_October_2016(215905686_1)_ (2).pdf;
_DOC_151448389(1)_Witness_Statement_of_Angela_Van_Den_Bogerd_v6_20_Aug_2
018_(RW_comments_23.08.18).docx

Inline-Images: image002.png; image003.png; image004.png; image005.png

Andy – pls see my comments on AvdB's statement.

We discussed this earlier today , but in addition to those comments, please note:

Re: counsels' comment on 55.2 ("Customers can cash ATM security requirements?"), I wasn't not sure what this meant, but I attach a letter DACB sent for us to the Valuation Office Agency on ATMs, which sets out at length (from para 35) various obligations for BoI's ATMs which flowed through POL to the SPMs...

Re para's 60 to 64: I attach two witness statement prepared on MoneyGram, Rob Scott's dealing at para's 11 to 17 with the processing of MoneyGram transactions, and Sean Farrow's dealing with our AML regime...

More generally, please note that last financial year Legal created a Legislative & Regulatory Framework, which in table format set out the leg's and reg's POL is subject by reference to business area and accountabilities. We followed that up with a Material Contract Framework which did the same thing for our more important contracts. I mention these now so that we can refer to them if need be down the line, as I don't think they can be (or indeed should be) used in the witness statements at his juncture (if for no other reason, the leg's and reg's are matters of law which counsel should be able to refer to without a witness statement).

One overarching point on the witness statements: please make sure you are giving the witnesses the "health warning" on signing a statement of truth, i.e. they need to be confident that what they say in the statement is true to the best of their knowledge and belief, and that they don't accept something just because it's been through the lawyers.

I'm off line tomorrow until c.11am GMT. I'll drop you a line when I'm back up. If for any reason I have a problem with my work phone/emails, I'll call you form my personal one

GRO

Thanks, Rod

From: Andrew Parsons [GRO]
Sent: 20 August 2018 16:32
To: Angela Van-Den-Bogerd [GRO]; Rodric Williams [GRO]
Cc: Victoria Brooks [GRO]; Ivan Roots [GRO]
Subject: RE: Statement [WBDUK-AC.FID26896945]

Angela

Please find attached your updated statement (+ a comparison showing the changes from the original version sent to you). This includes your comments, further amendments from Counsel and some comments from me.

Once you've had a chance to review, it might be easiest for us to setup a call to go through the remaining points.

Thanks
Andy

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP



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From: Angela Van-Den-Bogerd [GRO]
Sent: 17 August 2018 16:59
To: Andrew Parsons; Rodric Williams
Cc: Victoria Brooks
Subject: RE: Statement
Importance: High

Andy

Please find attached the latest version of my statement. This is still work in progress as I have some queries out with the business. I will pick this up again on Monday when I should have the information I've

requested. In the meantime I'm returning to you as I have some comments for you/WBD that I've tracked – could you review and let me have a response/update please. Where we've referenced other witness statements it would be helpful if I could see them. Is this possible?

I had intended to be on leave next week but in light of this being unfinished I am now in work on Monday and will pick up for the rest of the week to finalise this statement ahead of submission deadline.

Thanks,

Angela



Angela Van Den Bogerd

People Services Director

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GRO

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From: Andrew Parsons

GRO

Sent: 08 August 2018 21:15

To: Angela Van-Den-Bogerd

GRO

Rodric Williams

GRO

Cc: Victoria Brooks

GRO

Subject: Statement

Angela

Please find attached the latest draft of your statement. All comments welcomed. This has been restructured from the last version you saw, added a number of new sections and have cut out some material to make it shorter / where we have considered material to be to far over the line of admissibility.

Rod – your comments also welcomed. In particular, there are some comments marked in green for your attention.

Kind regards

Andy

Andrew Parsons
Partner
Womble Bond Dickinson (UK) LLP

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