

Subject: FW: Roll 2 [WBDUK-AC.FID123822914]

Date: Thu, 7 Mar 2019 11:07:33 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png; imaged2829d.PNG; image6ef5c4.PNG;

image0542d6.PNG

Matthew,

An urgent question has arisen in relation to paragraph 30 of Steve's second statement. In that paragraph Steve states that transactions were only injected into the counter "in the following circumstances while Mr Roll was employed by Fujitsu (emphasis added):-

- 29.1 fixing a Riposte Index at the counter;
- 29.2 removing a historic message that was influencing the balancing process on a replaced counter;
- 29.3 correcting configuration data after a PinPad change;
- 29.4 removing redundant configuration items;
- 29.5 the example given above involving five corrupted bureau transactions; and
- 29.6 removing historic recovery information."

This is based on the content of row 6 in the table below. Steve's statement goes on to say that this only happened on 14 occasions and only one of those involved transaction data. The 14 occasions were: PC0060114 {POL-0234909}, PC0112293 {POL-0283845}, PC0112293 {POL-0283845}, PC0112397 {POL-0283948}, PC0112650 {POL-0284204}, PC0112659 {POL-0284213}, PC0118037 {POL-0289559}, PC0122806 {POL-0293307}, PC0170799 {POL-0341013}, PC0175821 {POL-0345994}, PC0182141 {POL-0352240}, PC0198266 {POL-0368128}, PC0201613 {POL-0371420}, PC0203896 {POL-0373686}. You can ignore the POL numbers.

It appears that the 14 occasions actually span the life of Legacy Horizon, rather than the period during which Roll was employed. Is that right?

Please would you get back to me ASAP?

Kind regards

Jonny

Jonathan Gribben

Managing Associate
Womble Bond Dickinson (UK) LLP



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| DICKIN | SON | 3 | (1) | |
|---|--|--------------------|---------------------------------------|----|
| Sent: 25 January 2019 13:0 To: Jonathan Gribben | | | ; Dave.Ibbett GRO Andrew | |
| Parsons Subject: RE: Roll 2 [WBDU | | GN | <u>, maren</u> | |
| Jonny, | | | | |
| | e which we believe completed ray have now been analyse | | to action 3 as the remaining 16 | |
| Additions in red are additi shown with strikethrough. | | ne data sent to yo | ou on 24-Jan-2019. Changes in text an | re |
| Matthew Lenton Post Office Account Document Man P&PS, Digital Technology Services | ager | | | |
| Fujitsu | | | | |
| Lovelace Road, Bracknell, Berkshire, I | RG12 8SN | | | |
| Phone: GRO Email: GRO | ₁ | | | |
| Web: https://www.fujitsu.com/global | | | | |
| From: Lenton, Matthew Sent: 24 January 2019 17: | .58 | | | |
| To: 'Jonathan Gribben' Cc: 'SHenderson(| GRO | | ; 'Lucy Bremner' | |
| GRO | GRO ; Parker, Steve ∮ | GRO | ; Lucy Brenner >; Ibbett, Dave | |
| GRO | }; Newsome, Pete < | GRO | ; 'Gareth Jenkins | |
| GRO Subject: PE: Poll 2 IWRI | GRO DUK AC FID270324971 | | ; 'Andrew Parsons' | |

Jonny,

Please see below, a response is now added for action 3, which we think is mostly complete but will update further. No other changes to the table.

| Matthew Lenton Post Office Account Document Manager |
|--|
| P&PS, Digital Technology Services |
| |
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| Web: https://www.fujitsu.com/global/ |

| From: Lenton, Matthew | W | | | | | |
|------------------------|--------|--------------------|----------|------|---------------|-------|
| Sent: 24 January 2019 | 13:31 | | | | | |
| To: 'Jonathan Gribben' | | GRO | > | | | |
| Cc: SHenderson(| GRO | ; Lucy Bremner | <u> </u> | GRO | ; Parker, S | Steve |
| GRO | Ibb | ett, Dave < | GRO | >; 1 | Newsome, Pete | |
| < GRO | > | ; Gareth Jenkins < | | | GRO | |
| GRO | >; And | drew Parsons < | GRO | | > | |
| Subject: RE: Roll 2 [W | BDUK-A | C.FID270324971 | | | | |

Jonny,

Please see below revised table with responses added for actions 6 and 8.

Actions 3 and 9 are still being worked on, but an update is included in those rows.

| Action | Paragraph of Roll 2 | Action | Assigned to | Fujitsu |
|--------|------------------------|---|-------------|---|
| 1 | 8 | Keyword search for incidents containing the words "laptop" and/or "luggable" and/or "outreach" etc. [Matthew Lenton] Peak references provided 22-Jan-2019 | Fujitsu | Steve / SSC /Matthew Lenton/ Completed |
| 2 | 8 | Check what the experts and witnesses say about KEL psteed2847n. | WBD | |
| 3 | 9 | Because of the volume of data here (735 incidents) and the need to eyeball each one we're restricted the initial analysis to the 390 calls opened between 1999 and Jan 2002 (inc.). After this the beat rate significantly decreased (only 345 in the subsequent 8 years). This is believed to be due to the version M1 rollout (summer 2001) which appears to have significantly increased the reliability in this area. Analysis | Fujitsu | Steve / SSC [Matthew Lenton] Response provided at left. Updated 25-Jan- 2019 |

| Category | Calls | Residue | Comment | Event |
|--|-------|---------|--|-------------------|
| Orange Prepay Issue | 99 | 291 | Jan 2002. Reference data / software issue. | Software error |
| | | | Urgent software fix applied within a week. | |
| Newly migrated offices (paper to PC) | 61 | 230 | Oct 1999 – Nov 2001. Hot spots July | Migration |
| | | | – Sep 2000, March 2001. | |
| | | | Migration figures accepted inevitably lead to R&P issue. | |
| | | | No software fault. | |
| Erroneous settlement of Transfer Out and | 39 | 191 | April 2001 - June 2001. | Software error |
| Transfer In transactions to Cash (KEL DRowe50K) | | | Corrected cash accounts provided to Post Office Networks (PON). | |
| | | | Counter software fix @ release M1, which rolled out from May 2001. | |
| 'Balancing Error: Receipts and payments do not | 14 | 177 | March 2001 – July 2001. | Software error |
| match, please investigate. The error may be corrected using Reversal Function. WARNING: Continuing may | | | Reconciliation data has been provided to PON (suspect this was corrected cash accounts). | |
| lead to an unbalanced Cash Account" (KEL DRowe1625K) | | | Counter software fix @ release M1, which rolled out from May 2001. | |

| Stock unit being rolled over twice before the Cash Account is rolled. (KEL LKiang1222L, GMaxwell159r) | 8 | 169 | March 2001 – May 2001. Corrected cash accounts provided to PON. Counter software fix @ release M1, which rolled out from May 2001. | Software |
|---|---------------|-----|---|----------------|
| Single Counter Outlet (SCO) was replaced, without synchronising the messagestore. (KEL JBallantyne5328R) | 17 | 152 | November 2000 – November 2001. Reconciliation Data provided to PON. Mismatch between receipts and payments is due to a self originated message which overwrote a transaction on the counter messagestore. MSU noted in Nov 2001: This type of R & P incident is the only one we still get regularly. Is there anything that can be/is being done to fix it? Software fix @ release BI2. | Software error |
| Software fixes. | 27 | 125 | April 2000 – | Software |
| May be related to above KELs, or | 29 | 123 | December 2001. | error |
| other issues. | | | 12 @ CI4. | |
| | | | 10 @ M1. | |
| | | | 5 @ other. | |
| | | | 7 @ other. | |

| Reference data. Either rollout timetable not followed, resulting in unavailable local products such as OBCS, or products ending and stock remaining. | 13 | 112 110 | July 2000 – December 2001. OBCS products will have become available, later than expected. | Reference Data Error |
|---|-------------------|---------------------|---|---------------------------|
| Duplicate incidents within the set being analysed e.g. branch reports the same issue flagged on Fujitsu's host cash account report, or vice versa | 34 | 78 76 | September 2000 – December 2001. | Admin Ignore |
| Reconciliation resolved. May be related to above KELs, or other issues. | 41 | 37 35 | August 2000 – December 2001. Identified by data centre reporting. Root cause cannot be determined from Peak Information provided to POL to give correct view of accounts | Unknown |
| No fault, not R&P Peaks, etc | 11 | 26 24 | September 2000 – January 2002 | Admin Ingore |
| Temp Closed offices | 5 | 21 19 | May 2001 – January 2002 Correct outlet close process not followed. Information archived (e.g. Balance brought forward) by system. | POL Process Error |
| Hardware swaps | 5 9 | 16 10 | July 2000 – October 2001 | Engineering process error |

| | | | | | May 2000 – November 2001 | | | |
|---|----|---|-----------------|-------------|--|-------------|-------------------------|-------------------------|
| | | User | 4 | 6 | August 2000 – July 2001 | Training | | |
| | | | | | A&G for PM or Trainers, which sometimes wasn't followed (PC0065358). PM ignoring on screen messages (PC0053164). One call where PM accepted shortage, then a call was raised (PC0067250), possibly indicating lack of understanding. Another call (PC0068191) reads like lack of PM understanding of the Cash Account. | | | |
| | | Unclear | 6 | 0 | July 2000 – June 2001 Insufficient evidence to comment. | Unclear | | |
| | 12 | For 2002, 101 of the January. 99 of those was opened in Febru | were fo ary. | or the Oran | nat year were oper ge Prepay issue. | Only 1 call | WPD to | |
| 4 | 12 | Did Post Office review issues. | | | | | WBD to pick up with POL | |
| 5 | 16 | Review the contract be SLAs/penalties. | | | | | WBD | |
| 6 | 20 | Provide a list of reason injected at the counter. | | ich transac | tion data would nee | ed to be | Fujitsu | Steve / SSC |
| | | Issue with Riposte i | ndex at | counter | Potential fir | nancial | | Can this be ascertained |

| | impact because the wrong value or quantity was being used for a product |
|--|--|
| Last historic message stored at counter was incorrectly being considered as part of a balancing process | No financial impact. PM recognised that data presented was too old. |
| Config data relating to PinPad needs to be deleted if PinPad is removed from counter. AKA PinPad LPO delete. | No financial impact |
| Old configuration objects local to counter needed to be removed. | No Financial impact |
| LPO Delete. | |
| Five corrupted bureau transactions on counter | Financial impact (PC0175821) |
| | Changes approved by POL |
| | Documented on BIMS |
| PM left AP recovery for too long. Usually same / next day not months. Ref data for product referenced in AP recovery removed. Impossible for PM to complete recovery. Objects deleted. LPO delete | Possible but unlikely financial impact due to age of recovery information. |

[Matthew Lenton] Response provided at left, 24-Jan-2019.

from the sampling referred to below at 9?

* LPO=Local Persistent object. Configuration object used by the Riposte system. By its nature, requires intervention at counter.

Note: Last case (RiposteObject command) still being worked on. This relates to configuration information (similar to LPO above) and will not have any financial impact so is for completeness only.

Method

We searched the following databases to try and identify the incidents for which transaction data has been inserted at the counter:

KEL: Known Error Log

OCP: Operational Change Processes OCR / OCP

Peak: Incident management system

| System | Search Keywords |
|--------|--------------------|
| KEL | RiposteMessageFile |
| KEL | LPO Delete |
| | |

| | | KEL | Marooned | | | |
|---|----|---|--|---|---------|--|
| | | OCP | RiposteMessageFile | | | |
| | | OCP | LPO Delete | | | |
| | | OCP | Marooned | | | |
| | | OCP | RiposteObject put | | | |
| | | Peak | RiposteMessageFileRiposteMessage | | | |
| | | Peak | LPO Delete | | | |
| | | Peak | JBallant498J | | | |
| | | Peak | MYoung5043M | | | |
| | | Peak | Marooned | | | |
| | | Peak | RiposteObject put | | | |
| 7 | 20 | Review Peak counter). | reference 107043 (example of transaction | being injected into | WBD | |
| | | counter). | | | | |
| 8 | 21 | Gareth Jen Correction SSC. It is a March 2010 BRDB. In p systems upg audited and With old Ho Correspond Belfast tean correspond into the mes understandi Belfast had no knowled by scripts the change cont something t do lest it bre data. Their | ast team; and (2) privileged users have the lata between 2001 and 2004? Do they have the lata between 2001 and 2004? Do they have the lata between 2001 and 2004? Do they have the lata between 2001 and 2004? Do they have the late of which can inject transactions and udited when it runs and we have only used. The DBAs in Belfast can in theory do to cactice they will run scripts tested by a grade if DB changes are required. Any it since 2015 the actual commands run and control was weaker. SSC could be lence Servers and also at the counter. 1. Belfast had administrative access to be lence servers and had a theoretical abilities against the ling to do so. 1. The DBAs in Belfast can in theory of the late of the lence of the late of the lence of the late of | Transaction this is controlled by used it once in the anything to the elev as part of a such access is the also audited. The the ty to inject data thad the technical thaving no users and twords. The ppened to be done the ere provided under the estore wasn't thave attempted to twested/inserted twas very low/non- | Fujitsu | [Matthew Lenton] Response provided at left, 24- Jan-2019. |
| 9 | 21 | | mple of OCPs to give an indication as to ho lata was injected. | ow frequently | Fujitsu | Steve / SSC – relates to 6 above? |

| | | [Matthew Lenton] This is proving difficult to provide. The original plan was to examine sample months of change control data and produce rough figures. As Pete Newsome already discussed with you, this lead to it becoming apparent that support did not use formal change control in the earlier years for BAU support actions. We relied on the audit trail within the incidents (Peaks) to document support actions. We had auditability of the work done but no change control entries. We assume that the reasoning behind this was to allow implementation of support actions ASAP, and the audit trail being good enough where there was no financial impact. Therefore we are still looking at how / if we can provide an accurate | | [Matthew Lenton] Update at left. |
|----|---------|---|---------|---|
| | | answer to this question for the earlier years. | | |
| 10 | 22 | Search for documents relating to the controls around transaction data being injected (DE/HLD/002 is an example). | WBD | |
| 11 | General | Provide details of Fujitsu's document storage practices and retention policies. Are emails, word documents etc. from 2001 – 2004 available? [Matthew Lenton] Answered 22-Jan-2019 | Fujitsu | Matthew [Matthew Lenton] Completed |

Matthew Lenton
Post Office Account Document Manager

P&PS, Digital Technology Services

Fujitsu

| - | | |
|------------|----------------------------|------------|
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| | · | | | |
|------------------------|-------------------------|-----|------------------|---|
| From: Jonathan Gribbe | en [<u>mailto:</u> GRO | | | |
| Sent: 24 January 2019 | 09:56 | | | |
| To: Lenton, Matthew | GRO | > | | |
| Cc: SHenderson | GRO Lucy Bremner | GRO | >; Parker, Steve | |
| GRO | >; Ibbett, Dave ₹ | GRO | >; Newsome, Pete | |
| GRO | ; Gareth Jenkins | | GRO |) |
| GRO | ; Andrew Parsons | GRO | | |
| Subject: RE: Roll 2 [W | BDUK-AC.FID27032497] | | | |

Importance: High

Matthew,

Please would you provide an update in relation to the below this morning?

Kind regards

Jonny

| Jonathan Gribben Managing Associate Womble Bond Dickinson (UK) LLP | | |
|--|--|---------------------|
| GRO | | |
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| WOMBLE BOND DICKINSON | womblebonddickinson.com | |
| From: Matthew.Lenton | GRO | |
| Sent: 22 January 2019 15:46 To: Jonathan Gribben | | |
| Cc: SHenderson GRO ; Lucy Br | remner; ParkerSP(GRO ; Dave.Ibbett@ | GRO |
| pete.newsome GRO Gareth Jenk Subject: RE: Roll 2 [WBDUK-AC.FID270324 | kins < <u> </u> |) |
| | | |
| • | | |
| Jonny, | | |
| | and added the responses so far to actions 1 and | d 11 in the Actions |
| column, and some notes on progress etc. | . to the Fujitsu column. | |
| | | |
| Matthew Lenton Post Office Account Document Manager | | |
| P&PS, Digital Technology Services | | |
| Tal o, Digital Toolmology Convices | | |
| Fullface | | |
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| | | |
| | | |
| | | |
| From: Jonathan Gribben [mailto] | GRO | |
| Sent: 21 January 2019 17:39 | SERIE CO VERTICA CO VERTICA CON CONTROL DE C | |
| To: Parker, Steve < GRO | >; Ibbett, Dave GRO | >; Newsome, Pete |
| · | on, Matthew d GRO | ; Gareth Jenkins |
| Cc. Simon Henderson | GRO | > Lucy Bremner |



Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Dear all,

Privileged & Confidential

Thank you for your time earlier. Here's a list of the actions that I captured from today's calls. Please let me know if there's anything you'd like to add or change:-

| of Roll 2 | Action | Assigned to | Fujitsu |
|-----------|---|-------------|--|
| 1 8 | Keyword search for incidents containing the words "laptop" and/or "luggable" and/or "outreach" etc. The Peaks referenced below PC0100174 March 1st 2004 to 5th March 2004 FAD317309 reporting: Horizon Kit rebooting itself for no apparent reason. Helpdesk user: "Over the past 2-3 weeks engineers have been to site and have replaced 2xBU's and 2xPSU's but the problem persists." BU = base units = PC itself. PSU = Power supply units within the base units RR "Evidence (from event logs) shows that the power is being switched off every morning shortly (ie 5 or 6 minutes) before the PM logs on" RR: "After carrying out tests on our rigs, I have been able to duplicate the problem here on ONE of our rigs but not on others. It seems that the Screen Power Button is incorrectly connected to the motherboard." RR: "We have now identified two instances of this, one in live. This is a hardware build quality issue." This was followed by: PC0100899 18th March 2004 to 24th March 2004. | Fujitsu | Steve / SSC [Matthew Lenton] Details of Peaks provided at left. |

Hardware returned from site to Bracknell for examination.

RR: "Tests carried out on screen power switch - working correctly, no further action required."

Your questions 2d,e,f,g

d) Is his example true, or could it have been true: Yes. Can find no data on the origin for the statement: "This is a hardware build quality issue". Could be a discussion with engineering which was not recorded on the incident progress. Information we have only describes the hardware issue being seen internally to FJ on one instance of test rig hardware. No hardware error proved on the site.

If so, how often did that sort of problem occur: Very rare. Only one other found using keywords "standby", "laptop", "luggable". PC0055550 which was a problem on prototype hardware going into standby mode.

What would have caused it: Inconclusive. No information on root cause of issue reported by the Post Master onsite. Could be a hardware problem, could be user miss-operation of hardware.

Could it have affected/did it affect branch accounts: No. Once powered on the unit would function as normal.

If so, might its effect on branch accounts never have been detected with the result that some SPMs might have been wrongly held liable for false deficits: No

e) Would Rolls have disassembled laptops and done the other things he describes in para 8: Have to assume he did as per the incident updates. I expect he had some assistance (especially with kit on test rigs - different team totally) but unable to substantiate.

Would he have had/did he have the conversation with his manager he describes in para 8: Just can't answer this. My analysis of the issue would suggest that it turned out to be unimportant because there was no proof that this ever happened in the live estate and that his comment of "This is a hardware build quality issue" is simply conjecture. However, he may have discussed with engineering and truly discovered a batch of faulty hardware. I would have expected an update in the incident reading "Discussed with xxxxxxxxx in engineering and we determined that....... Bad batch...... etc" No such updates are present.

f) Was the problem referred to in para kept secret, as claimed at the end of para 8: No evidence either way. I would not expect that to

| 2 | 8 | be the case. It is not in Fujitsu's interest to have faulty equipment that is not corrected damaging reputation. g) Would Fujitsu management have known/did it know about this problem? Would/did Post Office? If not, why not: No way of knowing. Information no longer exists Check what the experts and witnesses say about KEL psteed2847n. | WBD | |
|----|---------|---|-------------------------|---|
| | | | | |
| 3 | 9 | Provide a list of events that give rise to a receipts and payments mismatch. | Fujitsu | Steve / SSC Examples only, or all scenarios that caused them in reality? [Matthew Lenton] May take rest of this week or more. Requires eyeball searching. |
| 4 | 12 | Did Post Office review TC volumes in order to identify potential software issues. | WBD to pick up with POL | g |
| 5 | 16 | Review the contract between POL and Fujitsu and summarise SLAs/penalties. | WBD | |
| 6 | 20 | Provide a list of reasons for which transaction data would need to be injected at the counter. | Fujitsu | Steve / SSC Can this be ascertained from the sampling referred to below at 21? [Matthew Lenton] SSC forming a query to find this from OCP data, also determining when transaction would be injected at the counter. |
| 7 | 20 | Review Peak reference 107043 (example of transaction being injected into counter). | WBD | |
| 8 | 21 | Did: (1) Belfast team; and (2) privileged users have the ability to inject transaction data between 2001 and 2004? Do they have that ability now? | Fujitsu | Gareth: answer 1 and 2 and perhaps explain again difference between old and new? |
| 9 | 21 | Review a sample of OCPs to give an indication as to how frequently transaction data was injected. | Fujitsu | Steve / SSC – relates to 20 above? [Matthew Lenton] See action 6 above |
| 10 | 22 | Search for documents relating to the controls around transaction data being injected (DE/HLD/002 is an example). | WBD | |
| 11 | General | Provide details of Fujitsu's document storage practices and retention policies. Are emails, word documents etc. from 2001 – 2004 available? [Matthew Lenton] Emails cannot be retrieved from the accounts of former Fujitsu employees from that period, and back ups are | Fujitsu | Matthew [Matthew Lenton] See answer at left |

not held for that period of time. The only records of such a person's emails would be if they are part of a current employee's email account or pst archive, in which case it would be only the subset of their emails that were to or from the other user. Similarly, for other documentation that was held locally be individual employees on their laptops, that would have been deleted when the user left.

As we have already seen, some limited information from this period does exist, stored in Dimensions and other networked

We are aiming to get a draft response to Roll 2 into circulation by early tomorrow afternoon.

repositories, some of which we have already provided in connection with this case.

Kind regards

Jonny

Jonathan Gribben

Managing Associate
Womble Bond Dickinson (UK) LLP



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From: Jonathan Gribben Sent: 21 January 2019 11:05

To: 'ParkerSP@ GRO | Dave.Ibbett(______; pete.newsome(_____, GRO______, Matthew.Lenton(_____GRO____) Gareth Jenkins <______ GRO_______

Cc: Simon Henderson GRO ; Lucy Bremner

Subject: Roll 2 [WBDUK-AC.FID27032497]

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To discuss

Jonny

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