

STRICTLY CONFIDENTIAL – SUBJECT TO LEGAL PROFESSIONAL PRIVILEGE

POSTMASTER LITIGATION STEERING GROUP

Terms of Reference and Membership

1. Membership

- 1.1 Post Office is the defendant in *Alan Bates & Others v. Post Office Limited*, High Court of Justice Queen's Bench Division, Claim No. HQ16X01238 (the "Claim").
- 1.2 The Postmaster Litigation Steering Group ("PLSG") is established to co-ordinate Post Office's approach and response to the Claim, and therefore brings together representatives from affected teams in the business as set out below at Table 1.
- 1.3 A deputy is permitted as a fully-empowered representative of the relevant team, subject to this being agreed in advance with the PLSG Secretariat.
- 1.4 Other colleagues may be invited at the Chair's discretion.
- 1.5 The PLSG is chaired by the General Manager, Network, who has responsibility for Network Operations. The Secretariat is provided by Post Office Legal.

Table 1: PLSG Membership

<u>Team</u>	<u>Representative</u>	<u>Deputy</u>
Network & Sales	Tom Moran, General Manager, Network	
Support Services	Angela van den Bogerd, Director of Support Services	
Corporate Services	Patrick Bourke	
Communications	Mark Davies, Communications Director	
IT	Rob Houghton, Chief Information Officer	
CEO	Tom Wechsler, Chief of Staff	
Finance	Nick Sambridge, Head of Business Performance Management	
Post Office Legal	Rodric Williams, Solicitor	

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External Legal*	Andrew Parsons, Partner, Bond Dickinson	
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**Representatives from External Legal will attend as necessary depending on the issues being discussed.*

2. Terms of Reference

- 2.1 The objectives of the PLSG are to ensure that Post Office's defence of the Claim:
- protects the Network;
 - is proportionately managed;
 - does not place unplanned constraints or resource burdens on Post Office; and
 - is consistent with business as usual (BAU) practices, processes and procedures.
- 2.2 In order to deliver these objectives, the Post Office Group Executive has agreed the PLSG will undertake the following responsibilities:
- a) providing a forum for cross-business discussion of Claim-related BAU issues so that all relevant matters are considered when making a decision;
 - b) providing instructions to Post Office's legal team on BAU/commercial matters;
 - c) maintaining and progressing an Action Plan for Claim-related activity, and monitoring the resources required to deliver against that plan;
 - d) signing off key Claim-related documents;
 - e) monitoring and approving Claim-related expenditure;
 - f) reviewing, challenging and signing off any Communications plans developed as a consequence of the Claim¹;
 - g) reporting matters to the Group Executive as appropriate.
- 2.3 Sign-off can be obtained through correspondence or discussion in a PLSG meeting and is to be recorded by the Secretariat.

3. Escalation

- 3.1 Any issue which cannot be resolved at the PLSG should be escalated immediately to the Post Office General Counsel by the Chair.

4. Organisation

- 4.1 The PLSG meets on an ad hoc basis as set by Post Office Legal. Any papers for the PLSG are commissioned, co-ordinated and circulated by Post Office Legal in advance.

¹ NB: Any operational plans, including contingency plans, which are required as a consequence of the Claim remain the responsibility of the respective operational units and/or the Business Protection Team as appropriate.

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- 1.6 A PLSG will only be quorate for decision making and mandate setting purposes if three or more PLSG Representatives (which need not include the Chair) are present at the meeting² or have submitted their comments including an explicit approval or rejection of any relevant proposal, to Post Office Legal in advance of the meeting.
- 4.2 All PLSG Papers, Minutes and Actions are held by Post Office Legal. Access is restricted and can be arranged by contacting Post Office Legal.
- 4.3 All PLSG discussions and papers are **STRICTLY CONFIDENTIAL AND SUBJECT TO LEGAL PROFESSIONAL PRIVILEGE** and not for discussion or circulation beyond the membership of the PLSG without express permission of Post Office Legal.

Post Office Legal
June 2016

² 'Present' includes PLSG members who dial-in to meetings via telephone.