

Witness name: Kevin Rennie

Statement No.: WITN12000100

Dated: 17.03.2025

THE POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF KEVIN RENNIE ON BEHALF OF POST OFFICE LIMITED IN THE POST OFFICE HORIZON IT INQUIRY

1 I, Kevin Rennie, of 100 Wood Street, London, EC2V 7ER, will say as follows:

INTRODUCTION

2 I am the Inquiry Director at Post Office Limited ("**Post Office**"). I am giving this witness statement in a corporate capacity on behalf of Post Office, in response to the Rule 9 request dated 14 February 2025 ("**R9(67)**"). I am aware of the steps Post Office has taken to respond to this R9(67); as such, I am the appropriate person to give this witness statement on behalf of Post Office.

3 I have aimed to include within this witness statement evidence relating to R9(67) insofar as the relevant facts are within my own knowledge. The facts in this witness statement are true, complete and accurate to the best of my knowledge and belief. Where my knowledge and belief, as set out in this witness statement, has been informed by another person or by documents that

I have reviewed, I acknowledge that person or those documents. I have been assisted in preparing this witness statement by Burges Salmon LLP and Fieldfisher LLP (together "**BSFf**"), who act on behalf of Post Office in the Post Office Horizon IT Inquiry (the "**Inquiry**"). I have also been aided by KPMG for technical analysis.

BACKGROUND

- 4 The Inquiry previously issued a notice pursuant to section 21(2)(a) and (b) of the Inquiries Act 2005 dated 29 November 2024, and varied on 4 December 2024 ("**s.21(36)**"), which required that (amongst other things) Post Office provide all notices sent by the Criminal Cases Review Commission to Post Office up to 1 January 2020, pursuant to section 17 of the Criminal Appeal Act 1998 ("**Section 17 Notices**"), together with an index of the same. Post Office produced these documents to the Inquiry ("**PROD161**") and provided an accompanying index on 13 December 2024 (the "**First Index**"). The Inquiry's R9(67) provides a revised version of this index which includes a new column of unique reference numbers ("URNs") and other amendments shown in yellow highlight (the "**Second Index**"). Post Office is asked to check the accuracy of the information in the First Index against the information highlighted in the Second Index and to exhibit an Updated Index to this statement.

UPDATED INDEX

- 5 Firstly, I understand that in the Second Index the Inquiry has (as indicated in yellow highlight) replaced the Bates Numbers of 19 documents. As these are substantively the same documents to those referred to in the First Index, Post

Office is content for the Inquiry to refer to its preferred versions. We have used the Inquiry's preferred Bates Numbers in the Updated Index exhibited to this statement (POL00462740).

6 Secondly, upon further consideration of both the First and Second Indices, Post Office identified five documents within the First Index where the Bates Number does not correspond to the document description. These are at: rows 33, 43, 44, 47 and 48.¹ Post Office instructed KPMG to consider the matter further and, as a result, KPMG identified a minor technical issue with PROD161. In summary, I understand that when finalising PROD161 KPMG made a change to the metadata in the s.21(36) coding field and then re-ran the production. This caused the order of the documents in PROD161 to slightly shift, resulting in five documents having different Bates Numbers. Unfortunately, due to a manual error by KPMG, the Bates Numbers on BSFf's Relativity platform were not reconciled with the Bates Numbers in the PROD161 export. To draft the First Index BSFf relied upon the Bates Numbers on Relativity which recorded incorrect Bates Numbers for the five documents.

7 I set out in a table below the five affected documents:²

Line	Incorrect Bates Number (as in the First Index)	Correct Bates Number (as in the production export received by the Inquiry)

¹ In the Second Index, the Inquiry has highlighted data in each of these rows for Post Office's attention, save for Row 33.

² By way of example, the Section 17 Notice at line number '44' referenced in the First Index with Bates Number 'POLBSFF-161-0000008', was instead produced to the Inquiry under Bates Number 'POL-BSFF-161-0000007'.

44	POL-BSFF-161-0000008	POL-BSFF-161-0000007
47	POL-BSFF-161-0000009	POL-BSFF-161-0000008
48	POL-BSFF-161-0000010	POL-BSFF-161-0000009
33	POL-BSFF-161-0000011	POL-BSFF-161-0000010
43	POL-BSFF-161-0000007	POL-BSFF-161-0000011

- 8 The Bates Numbers for the above five documents have been corrected in the Updated Index (POL00462740). Further, KPMG has conducted checks across all BSFf productions and confirmed that this Bates Number mismatch was due to an isolated manual error and has not occurred in any other BSFf production. For the avoidance of doubt, Post Office confirms that this was a numbering issue only and the correct documents were produced to the Inquiry.

Statement of truth

I believe the content of this statement to be true.

Signature:

GRO

Date: 17 March 2025

Index to the First Witness Statement of Kevin Rennie

No.	URN	Document Description	Control Number
1	POL00462740	Updated Index for Section 17 Notices	POL-BSFF-163- 0000001