

Witness name: Nick Read

Statement No: WITN00760400

Dated: 24 September 2024

THE POST OFFICE HORIZON IT INQUIRY

Fourth Witness Statement of Nick Read

on behalf of Post Office Limited in the Post Office Horizon IT Inquiry

1. I, Nick Read, of 100 Wood Street, London, EC2V 7ER, will say as follows:

A. Introduction

2. I am Nick Read, Group Chief Executive Officer (“**CEO**”) at Post Office Limited (“**Post Office**”). This is my Fourth Witness Statement to the Inquiry. I am giving this witness statement in a corporate capacity on behalf of Post Office, in response to Question 45 of the Rule 9 request dated 2 July 2024 (the “**Rule 9(58) Request**”). I am aware of the steps Post Office has taken to respond to this section of the Rule 9(58) Request; 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 Question 45 of the Rule 9(58) Request insofar as the relevant facts are within my own knowledge. The facts in this Fourth 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 Fourth 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**").

B. Post Office's process to identify the information shared between Post Office and the Shareholder during the period specified

4. I have been asked to consider section 12.1 of the Post Office Limited Shareholder Relationship Framework Document [**POL00362299**] and provide a summary of all information relevant to the matters being investigated by the Inquiry that has been proactively shared by Post Office with the government as Shareholder, and details of all requests made by the Shareholder to Post Office for information since 1 January 2023. Further, for each request, to confirm when Post Office responded to each request for information from the Shareholder, and whether all, part or none of the information requested was provided and why.

5. I have not personally been involved in the process of searching, harvesting or reviewing of documents in order to answer Question 45 of the R9(58) Request, but have been informed of this process by Post Office's legal team and BSFf.

6. As set out at paragraph 27 of Rachel Scarrabelotti's Second Witness Statement [WITN11120200], Section 12.1 of the Framework Document [POL00362299] confirms the Shareholder's right to information, as follows:

12. Shareholder's right to information

12.1 POL will proactively endeavour to share information on key strategic or policy issues with the Shareholder. Under the Articles (Articles 9.1 and 9.2), the Shareholder may "request such information in relation to the affairs of the group ... as it may consider necessary or desirable. The company shall use its reasonable endeavours to comply promptly ... but only in so far as the company has such information within its possession or such information can reasonably be obtained by it" and may meet with "such specified or other relevant directors and senior managers of the company ... to discuss the affairs of the group". The Shareholder may make such requests itself or via the Shareholder's Representative or Policy Sponsor. The Shareholder, Shareholder's Representative and Policy Sponsor may use the information as necessary to properly exercise the shareholder function on the understanding that due care will be taken in handling POL's information, as set out in paragraph 13 below. The appointment letter for the Shareholder NED

contains further provisions specifically on the sharing of confidential information between POL and the Shareholder NED.

7. The sharing of information between Post Office and the Shareholder happens on a regular basis. It takes place across a number of different levels and teams throughout the organisation and covers a range of issues. As CEO, I am not involved in the majority of the day-to-day communication and as such, it is not within my direct knowledge.

8. Post Office prepared its response to Question 45 of the Rule 9(58) Request in conjunction with Question 44(f) of the Rule 9(58) Request, which asked for information about all meetings between Post Office and the Shareholder. Both questions required material to be searched and harvested. I understand that the primary mode of sharing information between Post Office and UK Government Investments ("**UKGI**") / Department for Business and Trade ("**DBT**") is via email (as opposed to letters sent only in the post). As such, Post Office identified UKGI and DBT domain names, and this identified around c. 282,000 emails passing between Post Office and UKGI/DBT in the period 1 January 2023 to 1 July 2024. In addition, Post Office identified individuals within Post Office who met with the Shareholder during the course of their work and during the relevant period, and harvested potentially relevant files from their mailboxes where necessary. Further documents were also located in, and where potentially relevant, harvested from certain folders in SharePoint and OneDrive in Post Office's IT systems.

9. Further, I understand that some requests for documents are made and sent via a secure file sharing platform called Quatrix. I understand that although it is possible to obtain a list of communications between users and file names which were shared, it is not possible to reconstruct the message. KPMG produced a report which extracted over 1000 file paths (containing the file names) of documents shared between Post Office and the Shareholder, but the underlying documents are not retained on Quatrix. I understand that due to the complexity of the file paths it was difficult to extract the file names in a searchable format and assess relevancy from the report alone. In the time available it has not been possible to attempt to use the file paths to try to locate the underlying documents in the material that had been harvested or cross-check the file names in the chronology of communications in the spreadsheet.
10. Search terms relevant to the Inquiry's Terms of Reference were applied to the harvested documents. Post Office has kept a detailed record of these searches, but in summary they were designed to identify communications pertaining to matters relevant to the Inquiry:
- a. the operation of Horizon;
 - b. Strategic Platform Modernisation Programme ("**SPMP**") / New Branch IT system ("**NBIT**");
 - c. Postmasters;

- d. governance;
- e. culture;
- f. investigations; and
- g. Speak Up / Whistleblowing.

11. This narrowed the pool to c.11,600 documents. Once potentially relevant family documents, which were not responsive to the search terms, had been added to this pool, a total of 14,895 documents were then individually reviewed for relevance to Question 44(f) and Question 45 of the R9(58) Request. Key documents relevant to Question 44f were addressed in my First Witness Statement [WITN00760100] and produced as exhibits. Where a communication was relevant to Question 45, a summary of the communication was entered into the spreadsheet exhibited to this statement ('Summary of Information Sharing between Post Office and Shareholder', referred to in this statement as "**the spreadsheet**") [POL00460562].

12. The spreadsheet includes a summary of all relevant communications that were identified as part of this review. I understand that duplicative documents, or documents that were assessed as wholly legally privileged, have not been produced, and that wholly privileged documents have not been summarised in the spreadsheet. The documents produced totals 205 (not including family documents). The summaries in the spreadsheet seek to make clear the nature of the response from Post Office. Where Post Office has not been able to identify a response to a request for information from the Shareholder, additional searches have been run to try to locate it; however, in the time available it has not been

possible to conclude whether there was in fact no response from Post Office, or instead whether there was a response from Post Office, but it has not been located using the search terms applied.

13. I have not considered the underlying documents myself. There has not been time to do so, and as stated above I am not involved in every communication sent between individuals working for the Shareholder and Post Office. I have however reviewed the spreadsheet that has been prepared by Post Office, which I exhibit to this statement.

Statement of Truth

I believe the content of this statement to be true.

Signature: 

Date: 24 September 2024

Index to the Fourth Witness Statement of Nick Read

No.	URN	Document Description	Control Number
1.	POL00362299	Post Office Limited Shareholder Relationship Framework Document	POL-BSFF-0190809
2.	WITN11120200	Rachel Scarrabelotti's Second Witness Statement	WITN11120200
3.	WITN00760100	Nick Read's First Witness Statement	WITN00760100
4.	POL00460562	Summary of Information Sharing between Post Office and Shareholder (spreadsheet exhibited to Nick Read's Fourth Witness Statement)	POL00460562