

Witness Name: Carla Stent

Statement No.: WITN09930100

Dated: 11 September 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF CARLA STENT

I, Carla Stent, will say as follows:

INTRODUCTION

1. I make this statement in response to a request for evidence dated 8 July 2024 made by the Post Office Horizon IT Inquiry (the **Inquiry**) pursuant to Rule 9 of the Inquiry Rule 2006 (the **Rule 9 Request**). This statement relates to my role as independent Non-Executive Director ("**NED**") of the Post Office Limited ("**POL**") and Chair of the Audit, Risk and Compliance Committee (the "**ARC**") between 21 January 2016 and 17 February 2023.
2. I have sought to focus my statement on the specific questions contained within the Rule 9 Request to assist the Inquiry with its important work in fulfilling its Terms of Reference. However, before doing so, I wish to recognise the devastating and long-lasting impact the Post Office Horizon IT scandal has had on the lives of the people affected. I fully support the Inquiry's work to identify

what went wrong and to address how these past failings should be rectified. On a personal level, listening to the evidence and stories which have unfolded, I admire the courage and fortitude shown by so many people, especially those sub-postmasters ("**SPMs**") who are still waiting for appeals against convictions and for compensation. I want to say how saddened I am at the suffering of those affected, and the fact that so much remains unresolved after so many years. This is not something I take lightly. I hope that all those who have been affected will obtain full and fair redress, and that the Inquiry will make recommendations to help ensure that such a situation cannot happen again.

3. My solicitors, Latham & Watkins (London) LLP, have assisted me in preparing this statement, including by signposting me to contemporaneous documents to refresh my memory of events. I have also, where necessary, refreshed my memory by considering material in the public domain. Throughout this statement I have referred to documents where I considered that they may be helpful to the Inquiry and relevant to the matters on which I have been asked to comment. However, for reasons beyond my control, I have, in some cases, not received final versions of documents and therefore cannot be certain that I have seen all relevant information. Some potentially pertinent documents were received very recently and, as a consequence, I have been unable to cite supporting material on every topic.

PROFESSIONAL BACKGROUND AND APPOINTMENT TO POL BOARD

4. I was educated in South Africa and graduated with a Bachelor of Commerce in 1992 from what was formerly known as the University of Natal, and which is now called the University of KwaZulu-Natal. I then went to the University of South Africa and completed a B Compt Masters' Diploma in 1993, where I specialised in advanced accounting, taxation, business administration and auditing. Following this, I qualified as a South African Chartered Accountant and this gave me reciprocal membership of the Institute of Chartered Accountants in England and Wales.

5. I completed my accountancy articles with David Strachan & Tayler, which was part of the Pannell Kerr Foster Group, and I transferred with them from South Africa to London where I was a Manager until 1997. I worked for Natwest Equity Markets as a Financial Controller until 1998, when I moved to Baring Asset Management as an Investment Operations and Compliance Manager. I was then recruited to join Thomas Cook Group in 2000, where I was Corporate Finance and Special Projects Manager (UK), Director of Global Strategy & Corporate Finance (Germany) and then Operations Director (UK). I then moved to Barclays Bank in 2005, where I held several C-suite positions in finance, operations and governance in the Global Retail and Commercial Bank. Afterwards, I was recruited to join the Virgin Group in 2010 as a Partner in the business, as well as Chief Operations Officer and I served as NED in several of the Virgin Group's companies.

6. Since leaving the Virgin Group in 2013, I have held (and continue to hold) NED roles in a range of companies across the finance, retail and charitable sectors. This includes NED roles at companies in regulated sectors and I sought approval, as required, for each appointment from the Financial Conduct Authority ("**FCA**") and other relevant regulators, who confirmed that, amongst several requirements, they were satisfied that I had sufficient capacity to discharge my duties. Before taking on any new position, I have also always personally considered that I have sufficient time to commit and deliver against expectations.
7. I was put forward to join the POL Board (the "**Board**") in 2015 via an externally facilitated recruitment process. POL's chair, Tim Parker, was searching for a qualified finance professional who could chair the ARC and would be able to augment the financial services, retail and brand experience that existed within POL. My understanding from conversations at the time was that he was also looking for independent NEDs to help create a sustainable business that was less reliant on government funding through subsidies. I believe that my financial qualifications and the experience gained at Barclays Bank, Thomas Cook Group and the Virgin Group were of particular interest.
8. I have been asked to describe the training and induction I received prior to joining the Board. I did not request any training in relation to my role as a NED because I had prior NED experience and had attended externally facilitated and accredited NED training courses. In terms of training specific to POL's business, I did not receive any training prior to my appointment to the Board. In my

experience, training is usually only provided after joining a board so this was not unusual. However, to the extent possible from publicly available information, I carried out my own background research into the business during the recruitment process, as I would do prior to taking on any board position. As a result, I became aware of several media stories relating to alleged issues with Horizon raised by SPMs. I was also aware of the evidence given by POL to the Business, Innovation and Skills Committee in 2015.

9. During my interviews, I asked for an explanation of the situation. I was given verbal assurances by Mr Parker, Virginia Holmes (independent NED), Paula Vennells (Chief Executive Officer ("**CEO**")) and POL's independent auditors that issues relating to Horizon were historical, that POL had ceased all private prosecutions related to Horizon in 2015, that Horizon was 'robust' and that the mediation scheme, initiated in 2013, was about to conclude satisfactorily. I had no reason to doubt these assurances and I recall that the same message was repeated after I joined the Board by Jane MacLeod (General Counsel) and Rob Houghton (Chief Technology Officer ("**CTO**")). Prior to my appointment to the Board, I also met with Baroness Neville-Rolfe, then Under Secretary of State at the Department for Business, Energy and Industrial Strategy ("**BEIS**") on 23 October 2015. I recall that this was a short meeting where we discussed my CV, but I do not recall her highlighting any matters relating to Horizon.

10. POL uses Horizon as an electronic point-of-sale system (a model common across other high street retail businesses). When I joined the Board in 2016, my understanding was that Horizon had been through a number of changes with 'legacy' Horizon being rolled out in late 1999 and then superseded by Horizon Online in 2010. During my time on the Board, there were, as part of business-as-usual operations and like many of the businesses I have been involved in, further iterative changes as part of the maintenance and improvement to the Horizon system. Closer to the end of my tenure, we discussed the option of a broader move away from Horizon as part of the Strategic Platform Modernisation programme (see **POL00448810**). Since leaving the Board, I am not aware of what actions have been taken.

11. On joining the Board, I did have an induction programme, which I believe was of a standard format and generic in content. The POL induction provided some supporting documentation, such as Terms of Reference, a directors' information pack (with guidance on, for example, directors' statutory duties) and some past ARC papers but no legal, IT or Horizon briefings. The face-to-face induction included a one-and-a-half-hour overview of the Horizon system which was conducted in the 'model office' that replicated a Post Office branch. During this induction, I recall being given an overview of the types of products sold and this may have included showing, via a test system, how some customer transactions were processed. I do not recall any detail on the 'back end' processing, SPM reporting or any issues that were subsequently identified by the Honourable Mr Justice Fraser (as was) or the Inquiry.

12. On reviewing my induction schedule (**POL00448802**), in order to prepare this witness statement, I note that the induction comprised a broad overview of the principal business areas and functions. In my experience, this is not unusual given my role as a NED without operational responsibility. I am, however, with hindsight, struck by the absence of either a legal briefing or detailed IT briefing, which is a different approach to other organisations that I have since joined. Upon joining any board I would expect, as part of my induction process, a comprehensive briefing by the legal team covering any existing legal issues within the business, as well as to potentially be given access to the company's external lawyers. Equally, I would also expect an IT briefing from the CTO, especially if there are IT issues within the business.

13. These legal and IT briefings would have been particularly important and relevant in assisting me to fulfil my role at POL because these issues had the potential to impact the strategy and operations of the business, the handling of the group litigation ("**GLO**") and the accounts that needed to be reviewed and recommended by the ARC to the Board for sign off. Despite the lack of a legal or IT briefing at the induction, I rapidly established a constructive working relationship with the direct reports of both the General Counsel and the CTO, in addition to the Chief Financial Officer ("**CFO**"). These individuals were all regular contributors to ARC meetings on a range of business-as-usual matters but none made me aware of any issues with the Horizon system (if, indeed, they were aware themselves).

14. In hindsight, despite the verbal assurances I had gained, I regret not asking more questions about the complaints raised by SPMs during my induction period and my early days on the board when I was familiarising myself with the business. Assuming that I had been given both a legal and an IT briefing and that all the known facts around Horizon would have been disclosed fully to me, it would have provided important context, and would have likely changed my perspective on the reliability of the Horizon system as a whole and prompted more questioning of the GLO and business strategy.

15. As part of my induction, POL also arranged for me to spend a day visiting the Sutton, Wimbledon Hill Road, Putney and Richmond post office branches on 3 February 2016. My conclusion was that the SPMs cared deeply about their customers. I do not recall any issues with the Horizon system being raised with me – although the SPMs did raise some operational challenges that they were trying to overcome, for example, knowing if mortgage or credit card applications had ultimately been approved. The suggestions raised to me were mostly enhancements that would make the lives of SPMs and POL's internal staff, and by extension, that of the public, a lot easier.

EXPERIENCE ON THE POL BOARD

General Corporate Governance

16. With hindsight, I believe that improvements could have been made to the governance structure in relation to the litigation that existed prior to, and at the time of, the Common Issues Judgment ("**CIJ**") and Horizon Issues Judgment

("HIJ") (which I address in paragraph 22). However, at the time the governance structure which existed did not strike me as much different from generally recognised and recommended structures. As a NED, the Board and executive committees that existed were as I expected and, when required, additional committees were established to address specific issues, for example, the GLO subcommittee (see paragraph 21 below). Based on the information that was shared with us at the time, I felt that the Board operated effectively and with dedication, with constructive discussions and debate. Post the CIJ and HIJ, the Board recognised the need for increased oversight and, as a result, met more frequently. Between the years ending March 2020 and March 2022, the POL annual financial accounts show that the Board had 27 ordinary Board meetings and 71 additional meetings, the latter I recall being, primarily, to discuss the GLO and to review past criminal cases that had been referred by the Criminal Cases Review Commission ("**CCRC**").

17. With hindsight, the Board would have benefitted from having more detailed oversight of legal matters and from having additional specific functional expertise earlier in some of its committees to provide technical challenge to the experts. A NED with legal expertise would have been very helpful much earlier as this might have enabled more effective challenge of the external law firms and Queen's Counsel ("**QCs**"), as was at the time, advising POL.
18. As a result of much of what I have learnt during the Inquiry hearings, it is apparent to me now that any failings by the Board had less to do with the governance structure we were operating under, or a failure to ask the right

questions of the executive team, and more to do with the lack of openness from the executive when it came to sharing necessary information with the Board and its committees.

19. By the time that I left in February 2023, several positive changes had already been made to the governance structure. The Board had recruited additional NEDs with specific expertise. This included Ben Tidswell, a legal professional who was appointed to the POL Board on 27 July 2021 and who chaired the Historical Remediation Committee ("**HRC**") which was tasked with managing the administration of the compensation schemes for SPMs. It also included Lisa Harrington, an IT professional who worked closely with the IT team on the IT transformation and replatforming. As part of her role, Ms Harrington helped the business to identify the risks related to the IT transformation and replatforming which were then fed into the risk register and the ARC, together with regular updates into various related aspects. I believe that the appointment of SPM NEDs was also an important development and I return to this point at paragraph 44 below.
20. I have been asked to give my view on the current composition of the Board with regards to experience, expertise and abilities. The Board has changed further since my departure and therefore I am not able to comment on the current composition.

Horizon and the GLO

21. When I joined the Board in 2016, I understood that a working party was responsible for managing complaints about Horizon and I believe this had been running since July 2013. I was never a part of that working party and therefore was aware only of what was reported to the main Board. Updates were infrequent, usually verbal and, as I have now learnt through the Inquiry, were of a limited nature. After the GLO commenced, the Board agreed to establish a GLO subcommittee on 29 January 2018, with some Board representation, to follow the proceedings. It was only at this point that the scale of the issues started to become clear, and I recall that the numbers of potentially impacted SPMs eventually reached 555 by the time the case came to court in 2018. The decision to set up the GLO subcommittee made sense to me at the time – it meant that a dedicated team of Board members (not including myself) could focus on steering the GLO while the rest of the Board (including myself) focused on the extensive business-as-usual operations.
22. With the benefit of hindsight, I believe it was inappropriate for the initial Horizon issues to have been managed by a working party (with no Board representation) for an extended period of time. Furthermore, once the GLO subcommittee had been subsequently established, the members of the subcommittee were, I understand, limited in what they could disclose to the main Board because of warnings about legal privilege and confidentiality. During my time on the Board, I understood legal professional privilege to mean that distribution of any information relating to a specific matter should be limited. In relation to the GLO,

the directions of the General Counsel, Jane MacLeod, were that no information should be shared or forwarded without first seeking the permission of the legal team. Not being a lawyer myself, I relied on the expert opinion of the General Counsel and of the external lawyers advising POL. I have subsequently learnt, by following Inquiry hearings, that legal privilege can be waived in limited circumstances but I was not aware of that at the time.

23. I recall that most legal updates to the main Board concerning the GLO were of a procedural nature, primarily verbal and given by the General Counsel. POL had advice from a wide range of external experts, as well as, indirectly via the Board representative for UK Government Investments ("**UKGI**"), advisors acting for BEIS, UKGI, HMRC and the Treasury. However, prior to the HIJ in December 2019 and the standing down of the GLO subcommittee in January 2020, updates from advisors were mostly delivered to the GLO subcommittee, of which I was not a member. Thereafter, more information was shared with the full Board and external experts and professional advisors regularly attended meetings; the additional board meetings, in particular (see paragraph 16 above).
24. It is clear now that the pre-2020 governance structure prevented some Board members, including myself, from providing the level of scrutiny the GLO deserved. I recall that in July 2019, in an effort to improve board scrutiny of the litigation related matters, the Board discussed that the GLO subcommittee be stood down and all issues relating to it and the Horizon failings be brought to the main Board. This decision was finally implemented in January 2020

(see **POL00448806**, pages 2-3) and, together with the changes in personnel, including a change in 2019 of the POL CEO, General Counsel and supporting external legal teams, meant the full Board subsequently had much improved levels of oversight of the post-GLO remediation work.

25. As a Board, I recall that we discovered in April 2020 that a number of key reports and documents that concerned Horizon (some of which pre-dated my appointment and others of which were produced during my tenure) had not been shared with us on the basis of legal privilege. I recall that the Board only received a copy of, for example, the Swift Review a few months later; from evidence given to the Inquiry to date, I understand it was sent via email by Tom Cooper on 30 July 2020. At around the same time as the Board discovered the various Horizon reports, I also became aware of Gareth Jenkins, who was named as having been an expert witness for Fujitsu Services Limited ("**Fujitsu**"). I never met him or had any personal dealings with him and I never saw any of the expert witness statements he provided, nor that of any other Fujitsu witnesses. As a result of listening to this Inquiry, I now know more about Mr Jenkins and his role in the Horizon matter.
26. I was surprised and angry to learn that the Swift Review, in particular, had not been shared with us at the time it was produced in 2016, especially as, when the GLO began shortly afterwards, the Board was being repeatedly assured by the then General Counsel, members of the executive team and the various law firms representing POL that the Horizon system was robust. Given the weight

of so much expertise, and not being a legal or IT expert myself, I trusted the recommendations that I received.

27. The CIJ handed down by Mr Justice Fraser on 15 March 2019 marked a turning point, both in my own understanding of the severity of the situation and that of the whole Board. We began to fully recognise the impacts on the affected SPMs and this enabled a significant cultural shift within POL as outlined below.

POL culture

28. Following the CIJ, the Board was determined to right the wrongs of the past. Ahead of the HIJ, in early 2019, eight workstreams were established to start to drive change to processes, practices and culture, and a budget of £22 million was agreed to improve operational processes and the relationship with SPMs (see **POL00448806**, page 2). I discuss the relationship between POL and the SPMs in more detail from paragraph 33 below. The workstreams were, I believe, initially managed by the Operations team (see **POL00167372**, pages 3-4, **POL00448793**, pages 9-10, and **POL00448794**, pages 8-9, for examples of updates to the Board by the Operations team) and later by the Improvement Delivery Group formed in February 2021 (see **POL00448801**, page 5). A list of around 400 actions was tracked with completion statuses verified by internal audit and Deloitte (see, for example, **POL00448811** and **POL00448801**). By July 2021, about 75% of the actions had been completed (see **POL00448796**, page 2).

29. Nick Read joined as CEO in September 2019. He began to enable a culture change within POL and showed a willingness to focus on and address past issues. Equally, the change in General Counsel and the external legal advisors (referenced in paragraph 24) had a tangible effect on culture – with a greater transparency and openness in providing fuller updates to the Board being a key difference. Mr Read appointed individuals to his management team over the next few years who had significant experience in their fields and who appeared to have the cultural values that he was seeking to demonstrate and embed, and which the Board supported. I believe that later on, in March 2022, a new Director of Cultural Change, Communications and Engagement started at POL.
30. By July 2019, work had been done to start to overhaul the branch network related operational processes (see **POL00279838**) and the Board received regular updates on progress. This included work to improve processes, for example, onboarding, and suspension and termination. The aim was to enable greater transparency, more open communication and the validation of circumstances prior to taking any action. A dedicated loss prevention organisation structure was also stood up to prevent losses from occurring and to improve resolution and transparency. I recall that updates shared with the Board indicated early signs of positive progress. As I cover in more detail below, I recall that in late 2020 the organisation undertook a listening exercise with SPMs to reshape the support model, moving from telephone-based support to online support via the new Branch Hub tool (which I discuss further in paragraph 41). POL also developed new policies for working with SPMs (see

POL00448808) and a new support guide for SPMs (see **POL00401622**, page 2), and the language of communications was reviewed to be reflective of the learnings from the CIJ and HIJ.

31. From mid July 2019, POL was on a journey to integrate the changes. The revised cultural tone from the top – both from the Board and executive management – felt clear to me. In 2021, the executive team rolled out initiatives such as 'Adopt an Area' and training focusing on a 'Week in the life of a postmaster' (see **POL00448669**, page 2), both of which I discuss below, as well as a 'We are Post Office' campaign to embed the new values and behaviours. By this time, I believe that the framework for a change in culture had been established and, by the time I left, it was being rolled out and embedded. The progress was scheduled to be monitored and by the end of 2022, I recall that we were starting to see improvements in the metrics but with more work to do. As with any cultural change, we knew that this would take time.
32. During Phases 1-3 of the Inquiry, the Board actively encouraged the POL management and leadership to attend some of the initial hearings, which gave them the opportunity to hear, first-hand, the individual human impact stories of SPMs as well as the evidence of other witnesses. As a Board, we individually attended some of these hearings too – I attended on 14 October 2022 (see **POL00448792**). Culturally, I believe that this was a significant positive development, as the management and the Board were seeking to bring the lessons learnt from the Inquiry back into the organisation and, by hearing directly from the SPMs and others giving early evidence, we gained further

insight into what we needed to do to change systems, processes and culture as soon as practical. I am unaware if this practice continued after my departure from the Board.

POL BOARD RELATIONSHIP WITH SUB-POSTMASTERS

33. When I joined POL, SPMs were treated as agents running their own businesses, rather than customers or employees (with exception of the Crown Post Offices or 'Directly Managed Branches' as they became known). When this was first explained to me I felt it was strange that SPMs were not treated instead as customers, given that they represent the Post Office brand and provide Post Office services. However, I believe that this structure was seen within the organisation as being of benefit to the SPMs as they could be entrepreneurial in their ventures and (outside of the Post Office product sales) could operate in an unconstrained manner. It was also of financial benefit to POL as it meant that the SPMs were not direct employees of the organisation.

34. SPMs only started to be viewed as customers of POL after the CIJ in March 2019. On reflection, I believe that the business had, collectively over decades, allowed the contractual relationship to define what might otherwise have been a customer-centric partnership. Clearly, with hindsight, this was a mistake. Had POL adopted more of a 'service culture' towards SPMs and treated them as its customers, it could have encouraged a genuine two-way dialogue and created a relationship that worked for the benefit of both parties.

35. After the CIJ, the Board recognised the need to improve trust between POL and the SPMs (see, for example, **POL00167372**, page 4, and **POL00448813**, page 2). The Board wanted to take a strong lead on implementing material improvements ahead of the HIJ and there was a pivot towards focusing, not just on what we should do, but how we were doing it. Whilst trust needs to be earned and takes time, the executive team (under Mr Read's leadership) stood up a number of initiatives to begin to address this. These included structural changes and enhancements to communications with SPMs, as well as increasing the awareness of SPM's lived experience by POL management. I give some examples below.
36. Structural changes included introducing a revised retail network structure in, I believe, May 2019, and introducing an Area Manager for every branch, irrespective of size. In early 2021, the team responsible for the new Strategic Platform Modernisation programme had early engagement from SPMs which helped to prioritise key deliverables, including 'PUDO' (Pick up/drop off) – an initiative to work with carriers other than Royal Mail (such as DPD, Hermes and Evri) to manage the increase in online shopping by the public. I recall receiving confirmation in January 2021 that the programme had a workstream on SPM engagement and that SPMs were being treated as business partners (see **POL00448667**, pages 7-8). SPMs were also subsequently invited, in October 2021, to give their opinions on which devices should be chosen for new branch technology (see **POL00448797**, page 6).

37. An example of the enhancement of communications with SPMs was the SPM survey in March 2021, which was a chance for direct feedback. I recall that one of the key themes was that SPMs wanted increased communication from POL – a common theme in any feedback survey but one that POL considered seriously. Mr Read and the executive management team sought to increase communication via several channels including (but not necessarily limited to) written, video, in person and 'Branch Hub', which I discuss further below.
38. In September 2021, POL appointed a serving SPM, Hithendra Cheetirala, to the executive management team as Postmaster Experience Director. Around June 2021, Mr Read proposed a scheme whereby a small number of SPMs would spend six to nine months at POL's headquarters rotating through several projects, for example, designing training materials. Initiatives like these represented a fundamental shift in mindset, with an emphasis on increasing communication with SPMs, and ensuring SPMs were represented, and could give feedback, at all levels of the business.
39. To increase awareness of SPMs' lived experience by POL management, POL launched the 'Adopt an Area' initiative in 2021 (see **POL00448669**, page 2, and **POL00448809**). Each retail area was assigned one of POL's Senior Leaders/Managers, who would visit Post Office branches in that area (initially, virtually, on account of the Covid pandemic) and speak to SPMs and their staff, and the initial response was positive. Feedback was collated centrally in a 'Voice of the Postmaster' scorecard to identify top challenges and action being taken (see **POL00448667**, page 12). In addition to this and to augment it, in March

2021, the Board was told that POL would run 'Week in the life of a Postmaster' training, putting management in the SPMs' shoes and providing insight into different aspects of what it is really like to run a branch (see **POL00448669**, page 2). I understand that POL had previously offered a short 'Postmaster Experience' session as part of a broader training module but the new week-long programme was intended to give management a more rounded and in-depth insight into the day-to-day business of a Post Office branch. I believe that the 'Week in the life' training was later rolled out to all POL central support staff.

40. I believe that in order for any cultural change to be effective, words and actions need to be aligned and action must be taken on multiple re-enforcing levels. There are many ways to do this and probably no singular right way. But I believe that the steps taken (including the examples that I have described above) were a good start and, in particular, the survey was a good way to set a baseline for measuring and evaluating progress. It was intended that the impact of these steps would be measured and adapted as necessary over time and I hope that more has continued to be done after I left – both in terms of actions based on learnings and measuring progress.
41. In the second quarter of 2019, the Board discussed a new initiative known as 'Branch Hub', which was designed to replace the various communications platforms and channels used by POL and SPMs. It was envisaged that Branch Hub would be a single point of interface for the SPMs as a self-serve portal that could be accessed via their own devices. It was intended that functionality would be expanded over time. I recall discussing at the March 2019 Board meeting

that SPMs should be included in setting the prioritisation and in the testing and design of the roll-out. It was thought that the system would also benefit POL as it would support ongoing operational transformation activities – for example, delivering an improved on-boarding experience and improving in-branch process efficiency and operational controls.

42. I believe that the success of an initiative such as Branch Hub is dependent on the take up and usage by the people it is designed for – in this case the SPMs. It was successfully used during Covid for branches to be able to order PPE (see **POL00448807**). Usage slowed a little after that but I recall that, by the end of my tenure, the Board was told that adoption by SPMs of both the digital portal and the mobile app was reported to be high and that it was intended that Branch Hub would ultimately be integrated into the Horizon replacement system as part of the Strategic Platform Modernisation programme.

43. As I left POL in February 2023, I am not aware if these releases were delivered successfully or not.

Sub-Postmaster NEDs

44. As part of a concerted effort to get the voice of the SPMs into POL and into the boardroom, in June 2020, the Board discussed and expressed support for the appointment of SPM NEDs. The purpose for having SPM NEDs was announced in a press release on 17 August 2020 as being to "advocate the interests of more than 8,000 Postmasters". I recall that the Board believed that having the representatives of the SPMs involved in the decision-making and in setting

POL's future strategic direction would be very valuable. There was discussion about whether there should be one or two SPM NEDs and, initially, the Board decided to appoint one – which I recall was due to concerns over the size of the Board. However, following feedback from (I believe) the National Federation of SubPostmasters ("**NFSP**") and the Communication Workers Union ("**CWU**"), the Board recommended and UKGI agreed to appoint two SPM NEDs and this decision was announced in January 2021.

45. I recall that, from the outset, the Board wanted the SPM NEDs to be representatives of the network of SPMs, elected by them and not by POL. We did agree certain criteria that would be required to be an effective and credible NED, including experience of developing a Post Office business and a minimum tenure as a SPM. Applicants were assessed by recruitment specialists with expertise in recruiting NEDs in the public sector, before completing a competency-based interview with an independent panel (see **POL00448795**, pages 5-6). Shortlisted candidates then canvassed the SPM network for support ahead of an election, which was overseen by an independent, external body. The two SPMs with the most votes were recommended to the Board and the Secretary of State for BEIS for final approval. This approval was a formality in terms of the governance structure and the Board never intended to (and did not) exercise any right to veto the outcome of the election. The two successful candidates, Sarfaraz (known as Saf) Ismail and Elliot Jacobs, were appointed as SPM NEDs by the Secretary of State on 3 June 2021 (see **POL00448670**, page 1).

46. I welcomed the appointment of the SPM NEDs and encouraged the democratic election process, with oversight by independent organisations and panels, as I believed it went a long way to rebuilding trust with the SPMs and in ensuring that the individuals elected would have credibility amongst their peers.
47. With the benefit of hindsight, before the HIJ, the Board suffered from a lack of direct interaction with SPMs. The voice of the customer (SPMs in the case of POL) needs to be heard directly by any board. Had this existed earlier, it might have allowed for details on the issues with Horizon to surface earlier and for a more constructive and open culture to develop (see paragraph 34 above). I felt that the appointment of SPM NEDs in June 2021 was an important step forward in this respect. Having the SPM NEDs at Board and committee meetings ensured that Board decisions more formally considered the impact on or benefit to the SPMs and their direct engagement helped to shape POL's strategy and its implementation (see, for example, **POL00448670**, page 7, and **POL00448796**, page 3). I was particularly pleased that POL was able to have two SPM NED seats because I have experienced personally, and have seen elsewhere, the challenges of being a lone representative.
48. I have been referred to an article in 'The Times' newspaper dated 19 February 2024 (**RLIT0000201**) which includes a statement from Mr Jacobs regarding his and Mr Ismail's treatment by the Board. I left the Board on 17 February 2023 and so I served alongside Mr Jacobs and Mr Ismail for around 20 months. I was surprised by the article and I do not recognise the attitudes it described or the

terminology it used. I did not see evidence of the assertions made in the article although I was not part of the Board in the year leading up to its publication.

49. For my part, I believe that the contributions of the SPM NEDs were not disregarded and that they were given a voice in and outside Board meetings to share their points of view. I recall being impressed that, in their first meeting, they did not hold back, asked many questions and posed good challenges that were debated. I also encouraged the appointment of Mr Jacobs to the ARC in advance of the 5 December 2022 meeting (see **POL00447940**, page 5) to bring a more detailed SPM view to the ARC's discussions. While I was only on the Board for Mr Jacobs' first two ARC meetings, I found him to be a very helpful addition to the committee's membership.

50. There were a few occasions where suggestions made by the SPM NEDs were not able to be implemented either because they were not commercially viable or not appropriate on a national scale. These decisions were only taken after full exploration by POL's executive management team, in the same way that suggestions by any Board member on other topics would have been considered.

POL BOARD RELATIONSHIP WITH EXTERNAL STAKEHOLDERS

51. I have been asked to describe the Board's relationship with the NFSP, CWU, Fujitsu, UKGI and the Department for Business and Trade ("**DBT**"), formerly BEIS.

52. A board does not typically have a direct relationship with customers, suppliers or other external stakeholders. This is usually the remit of the executive management team, from whom the board will often get feedback via board materials and board meetings, as well as more informal discussions.
53. From the information shared at Board level about interactions with these stakeholders, I would describe all these relationships as professional and POL took interactions with each seriously, preparing for meetings with each diligently. As in all businesses, there are periods when the parties have differing views and objectives. However, my experience was that POL sought to have a constructive dialogue to work through these differences to find a solution.

NFSP

54. I never met any representatives of the NFSP during my time on the Board. My understanding is that the NFSP was originally envisaged to serve as a trade association representing the SPMs, and it was established to create a helpful link between the SPMs and POL. However, it did not appear to be well-used by the SPMs, perhaps because it had been funded by POL since 2015/2016 (rather than by membership fees) – and this sentiment was expressed to me on some of my visits to Post Office branches in March 2019. I recall that the Board discussed whether there was a way to reform the NFSP to make it a more democratic organisation that was valued by, and accountable to, the SPMs.
55. I also recall that the Board asked the NFSP to review new SPM policies (see **POL00448816**, page 3), and it was suggested at a Board meeting in

December 2022 that the NFSP could assist in delivering training to SPMs in relation to the Strategic Platform Modernisation programme (see **POL00423919**, page 7).

CWU

56. I never met with the CWU but I recall discussions at Board level about negotiations over pay, bonuses, and other matters common to any union/business dialogue.

57. I believe that the CWU was funding a significant employment tribunal case. The case was managed by a steering group within POL (of which I was not a member) and I recall the Board receiving occasional summary updates on this topic.

Fujitsu

58. Fujitsu managed various aspects of POL's IT estate. Not being an IT expert myself, I relied on the expert opinion of the relevant IT accountable executive and of the external advisors to POL. By the time I joined the Board, I understood that the relationship between POL and Fujitsu had become more challenging. I recall that, in February 2016, the Board considered a business case on the IT platform (see **POL00448814**). Fujitsu had been given notice that their contract would not be renewed, and a new provider had been appointed – but by February 2016, it was clear that the new provider would not be able to deliver. It was therefore proposed that the Fujitsu contract would be extended to March

2021, with the option for two further one-year extensions if necessary – both of which were later exercised. I had been in post for a matter of weeks at this point and was reliant on IT expertise, and I therefore had no reason to question this decision.

59. I recall that in 2018, the Board was informed that a number of key Fujitsu staff who understood Horizon were retiring, making the system changes required for the changing commercial imperatives, increasingly hard to implement. This concern about loss of staff was reiterated in 2020, and again in 2021 (see **POL00167384**, page 6, and **POL00448670**, page 11). I recall that the CEO and Chief Information Officer ("**CIO**") at the time in 2018/19, Paula Vennells and Rob Houghton, had regular calls with the Fujitsu CEO. By June 2020, and in response to Fujitsu approaching POL to seek an early termination of the overall Horizon agreement, the Board supported the high-level intent for the Strategic Platform Modernisation programme and mobilisation of activities to reduce POL's dependence on Fujitsu in the long term (see **POL00167384**, page 7). This programme was further developed over the coming months.
60. In September 2022, the Board approved the exercise of a further extension to the Horizon agreement (see **POL00447940**, page 17). I am unaware how matters have unfolded since, given that I stepped down from the Board in February 2023.
61. From October 2018, POL was also seeking to move away from its Belfast Data Centre, provided by Fujitsu, to a cloud-based solution. I believe that Fujitsu was

supportive of this migration and there was initially good co-operation between Fujitsu and the cloud storage provider. However, I recall that there was later concern over Fujitsu's ability to deliver on the migration and their apparent lack of engagement. Both Jeff Smyth (who held a number of roles in the POL IT function including CTO and CIO) and Nick Read (CEO) worked with Fujitsu at executive level to try to get clearer accountability but it was felt that POL had limited leverage (**POL00448670**, page 4, and **POL00448667**, pages 14-15). The Board and ARC had regular updates on this matter (see, for example, the following Board updates: **POL00448667**, pages 14-15, **POL00448669**, page 15, **POL00448799**, pages 5 and 12-13, and **POL00447940**, pages 15-17). The executive management team tried to leverage the broader government relationship with Fujitsu to unlock certain areas – including trying to arrange for Fujitsu's CEO to see a government minister in June 2021 (see **POL00448670**, page 11). I cannot recall if this meeting ever took place. It became clear to the Board that the migration had become much more complex than initially anticipated and the Board agreed to abandon it (see **POL00447940**, pages 16-17). When I left the Board, POL was in the process of agreeing an extension to the data centre services contract with Fujitsu, at incremental cost.

UKGI

62. The relationship each of the Board and executive management team had with UKGI was probably different depending on their role in POL. Some functions, such as finance, had, I believe, more frequent and detailed interactions. I viewed the relationship – which, for me, was almost solely with the UKGI representative

on the Board, first Richard Callard and then Tom Cooper – as that of a typical shareholder relationship. However, UKGI was more akin to a private equity shareholder because it had dedicated teams who were able to conduct in-depth analysis on behalf of the Board representative. UKGI typically had more information than the rest of the Board. As **POL00448805** notes (at page 2), this was to enable enhanced oversight of POL's investment activities and robustness of the underlying controls by UKGI.

63. Prior to the GLO, my perception was that most interactions between UKGI and the Board were in connection with funding and with meeting the access requirements that POL had to deliver – namely maintaining 11,500 branches with the required geographic spread.

DBT/BEIS

64. For most of my tenure the DBT was known as BEIS and I will refer to it here as such. The Board did not interact with BEIS very often but when we did, I recall that the meetings were professional and the preparations beforehand were extensive. A new BEIS Minister would occasionally attend Board meetings; such attendances were usually very structured, well-planned and ran to the tight timetable set by BEIS.
65. I was not personally involved in agreeing the terms of any Horizon-related compensation schemes with BEIS or any of the government departments, nor in agreeing any settlement with any SPM. I was also not involved in the creation of the mediation scheme in 2013 (referred to in paragraph 9 above) and I believe

the final mediations were concluding at the time I joined the Board. I was, however, party to the discussions at Board level relating to the various compensation schemes that were established after the CIJ and HIJ. I understood that my role as a NED was, together with my colleagues and following advice from Herbert Smith Freehills ("**HSF**"), in particular, to review and make recommendations on the compensation frameworks to BEIS for their approval (as the funding of the scheme was wholly dependent on the government). Once the frameworks were approved, the HRC then worked with POL's external lawyers to implement the settlement schemes. I was not a member of the HRC.

66. I recall that the Board and management wanted to put right the wrongs of the past as quickly as possible, but had to be equally mindful of the need to ensure that taxpayer money was spent carefully. There therefore needed to be a logical basis on which to establish a fair level of compensation. This became very complicated given the number of categories of loss, some of which were more straightforward to compensate whilst others carried a higher degree of subjectivity. It felt, at times, that the process was frustrating the desire of the impacted SPMs, the management and the Board to reach an agreed settlement. In November 2021, the Board asked Tim Parker to speak to the Minister to discuss funding as we were conscious that we were approaching the two-year anniversary of the Historical Shortfalls Scheme ("**HSS**") in May 2022 with little progress on the settlement with relevant claimants (see **POL00448798**, page 6). This did appear to improve in November 2022 with the agreement of the

funding for SPM detriment for suspensions and for the late applications to the HSS.

67. I am aware that a number of impacted SPMs are still awaiting compensation and I remain hopeful that a solution can be found to remedy this situation.
68. My role as Chair of ARC required that the committee carefully considered and challenged the management and external auditors' recommendations for the provisions made and the supporting disclosures in POL's annual reports and accounts. The ARC sought the expert advice of the financial and legal professionals and, collectively, all parties sought to implement the accounting principles accurately. As a result of POL being financially dependent on BEIS, the Board had to obtain comfort that BEIS would continue to fund the business for at least 12 months post the date of signing the annual report (with the Board considering the Group's financial forecasts for a 15-18 month period), in order for the accounts to be prepared on a going concern basis. This usually required POL to obtain several Companies House filing extensions, before the required letters of comfort were received.
69. My personal interactions with BEIS outside of board meetings were limited. The Chair of the BEIS Audit and Risk Assurance Committee organised bi-annual conferences which I attended on several occasions, in my role as Chair of ARC, during my time on the Board. Members of the BEIS Audit and Risk Assurance Committee also attended POL ARC meetings as observers on 30 March 2021 and 26 September 2022. I assured the BEIS attendees that

I would welcome their interactions in the meeting and gave them the opportunity to share reflections with the ARC members at the end of the meeting but there was no feedback on either occasion.

70. I also had a meeting with the BEIS Audit Chair shortly before my departure (6 February 2023) from the Board to discuss general matters related to POL.

WHISTLEBLOWING

71. I am no longer a member of the Board, and the whistleblowing practices may have evolved since my departure. I am therefore unable to comment on the current culture, policies or procedures.
72. Whilst I was on the Board, the Group General Counsel had overall responsibility for the implementation of the whistleblowing policy and appointed a third-party supplier to run POL's whistleblowing facility (which was provided at various times by InTouch, Expolink/NAVEX Global and Convercent). I believe that the whistleblowing function was managed by the Financial Crime team and that they produced monthly management information reports, although the ARC only received summary information as part of an annual update (see **POL00448815**, page 3).
73. The Whistleblowing Policy ("**Policy**") and POL's whistleblowing practices were reviewed at least annually by the ARC with the objective of ensuring that individuals could confidentially, without fear of retribution, report concerns to be investigated. The ARC was asked to ensure that the Policy complied with

regulatory changes, including any new FCA requirements, and in response to the outcome of relevant reviews such as the internal audit of the area which concluded in January 2019 with a Satisfactory rating.

74. I have been asked to reflect on the adequacy and effectiveness of the Policy and POL's whistleblowing procedures. I have addressed this question separately in relation to SPMs and internal POL staff.
75. Although they were entitled to use the service, I do not recall any SPM whistleblowers coming through the process, although some cases were raised by agent assistants (see **POL00448815**, page 3). POL took various steps to increase awareness of the whistleblowing facility, and encourage whistleblowers to come forward, which I discuss in more detail below. In relation to SPMs specifically, POL provided updated whistleblowing guidance, as well as training to identify whistleblowing reports for referral to the whistleblowing team.
76. As regards POL staff, I found the effectiveness of the Policy and whistleblowing procedures to be similar to other organisations I have worked at. In my experience, the number of whistleblowing reports is usually low and reports are often found to relate to an individual's grievance which therefore should be handled via the Human Resources processes, rather than a situation which fits the definition of a true 'whistleblow' which concerns itself with issues that are in the public interest – for example, a criminal offence like fraud, health and safety matters, a miscarriage of justice, etc.

77. I recall that POL asked HSF to review the Policy alongside the Investigation Policy and the Postmaster Complaints Policy. They reported back in March 2021 with suggestions to further strengthen the policies. A number of policy changes were considered at the time (including HSF's suggestions), such as checking that whistleblowers feel supported and clarifying that reporters don't need to provide evidence. I believe that POL adopted these changes.
78. In the months leading up to March 2022, several additional enhancements to the whistleblowing process were made: (i) POL re-ran an assessment of its whistleblowing framework using benchmarking tools from the whistleblowing charity, Protect; (ii) a new case management system was fully operational; (iii) mandatory whistleblowing training was also put in place, which was delivered to all POL employees between March and September 2021 via an online training platform; and (iv) a whistleblower feedback form was created to be issued following the conclusion of each investigation (see **POL00448815**, pages 1-2). Separately, a Central Investigations Unit, reporting into the Group Legal Director (Sarah Grey, who in turn reported into Ben Foat as General Counsel), was established to oversee and investigate all complex and material cases.
79. I do not believe that staff were discouraged from making whistleblower reports. As a NED with no direct management or operational responsibility, serving after the prosecutions had been suspended, I cannot comment on why some staff who were working on prosecutions and/or Horizon-related investigations did not make reports via whistleblowing channels if they were concerned about the

fairness of POL prosecutions and had not received adequate responses to concerns/queries that they may have raised with management at the time. However, I recall that the ARC requested that HSF review past whistleblowing cases going back to 2013 to identify if there was any evidence that whistleblowers or the subjects of the reports (specifically SPMs) suffered detriment.

80. Like many other organisations, and especially after the HIJ, POL sought to increase awareness of the whistleblowing policy and practices, and encourage staff to come forward with any concerns (see **POL00448815**, page 1). Posters were placed in POL's offices reminding staff of the whistleblowing channels and surveys were conducted via the intranet to understand the level of awareness within the business. My recollection is that following these awareness campaigns, the volume of whistleblower reports did increase. I believe that this included some reports around unethical behaviour and policy breaches, suggesting that POL staff were more alive to the importance of escalating a broad range of issues.

81. Zarin Patel, an independent POL NED, was appointed as the newly created independent 'Whistleblowing Champion' in March 2021 (see **POL00401622**, page 4). It is normal for there to be a member of the executive team or, more often, an independent NED appointed as a whistleblowing champion with a generic email address to which staff can send information. I supported this appointment believing that it was a good practice for POL to adopt. At or around the same time, a dedicated Whistleblowing Manager role was created (see

POL00448815, page 2) and a whistleblowing team was established, with whom Ms Patel met quarterly.

82. I am not aware of any whistleblower reports since the CIJ and HIJ that were expressly related to Horizon. However, I recall that whistleblower reports continued to be received that related to SPMs and that concerned allegations of, for example, fraud and cash discrepancies. It is my understanding that these cases were passed to the Central Investigations Unit to consider in light of the findings of the CIJ and HIJ, including assessing whether there was any possible link to Horizon.

DEPARTURE FROM POL BOARD AND SUBSEQUENT EVENTS

83. I served on the Board from 21 January 2016 to 17 February 2023. Generally, a NED should serve a maximum of two terms of three years when working for a government-owned asset such as POL. My second term was approved on 29 January 2019. Shortly before the end of my second term, I recall having two separate telephone calls with Mr Parker and Mr Cooper. They asked me to remain on the Board for an additional period to finalise the annual report and accounts for the 2021/22 year end and to prepare for them to be laid before Parliament, which was subsequently done on 23 February 2023. The accounts were approved and signed in August 2022 (see **POL00448812**) but there was a delay in publication due to an outstanding approval from BEIS on a remuneration matter (see **POL00447940**, page 7). In my final ARC meeting on 23 January 2023, the ARC recommended to the Board that the 2021/22 annual

report and accounts were published (see **POL00448800**, page 2). I handed in my resignation letter on 17 August 2022 and I stepped down from the Board on 17 February 2023, after handing over to the new ARC Chair, Simon Jeffreys.

84. I have been asked to set out my understanding of the circumstances which led to the dismissal of Henry Staunton as POL Chairman on 27 January 2024 and the resignation of Alisdair Cameron as CFO on 25 June 2024. I left the Board before the departure of either Mr Staunton or Mr Cameron and am therefore unable to comment on the circumstances which led to those events.

REFLECTIONS

85. Looking back on events now, with the advantage of knowing more than I knew at the time, I believe that the organisational culture and ways of working led to an over-reliance on the views of and advice from a limited group of senior leaders. As the Inquiry has heard from others, the Board was not party to the full facts at many key moments, especially during the first three years of my tenure from 2016-2019. The more details that emerge via the Inquiry, the more I am forced to reconcile how little was shared with myself and others on the Board by those responsible for managing the Horizon IT failings. Had all the known facts around Horizon been disclosed to us fully, I believe that this would have likely changed my perspective on the reliability of the Horizon system as a whole and prompted more questioning, particularly of the GLO and the associated business strategy. In addition, I believe that the Board would have benefitted from more detailed oversight of legal matters, having the voice of

SPMs heard more directly and additional specific functional expertise earlier in some of its committees to provide technical challenge to the experts. POL later appointed individuals to provide that functional expertise, who all made valuable contributions.

86. Following the CIJ, management and the Board focused on beginning to right the wrongs of the past and I felt that this led to a significant cultural shift within POL. As I have outlined above, I believe that, by the time I left, the framework for this change in culture had been established and was being rolled out and embedded. Cultural change takes time but I believe that the early signs were encouraging and I hope that more has continued to be done since I left the Board.

87. I hope that all those who have been affected by Horizon will obtain full and fair redress, and that the Inquiry will make recommendations to help ensure that such a situation cannot happen again.

Statement of Truth

I believe the content of this statement to be true.

Signed: 

Dated: 11 September 2024

Index to First Witness Statement of Carla Stent

No.	URN	Document Description	Control Number
1.	POL00448810	Post Office Limited – Strategic Platform Modernisation, Business Case Review Final Report by Deloitte dated May 2021	POL-BSFF-WITN-017-0039718
2.	POL00448802	New Chair of Audit Induction Programme for 8-9 February 2016	POL-BSFF-WITN-017-0000034
3.	POL00448806	Board minutes of Post Office Limited dated 28 January 2020	POL-BSFF-WITN-017-0023723
4.	POL00167372	Board minutes of Post Office Ltd dated 30 July 2019	POL-0161312
5.	POL00448793	Board minutes of Post Office Limited dated 08 April 2020	POL-BSFF-WITN-013-0000003
6.	POL00448794	Board minutes of Post Office Limited dated 26 May 2020	POL-BSFF-WITN-013-0000012
7.	POL00448801	Postmaster Journeys, Post Office Limited, Final Draft Report by Deloitte dated March 2021	POL-BSFF-WITN-015-0009298
8.	POL00448811	Post Office Limited's Internal Audit Report dated 30 June 2021	POL-BSFF-WITN-017-0039770
9.	POL00448796	Board minutes of Post Office Limited dated 27 July 2021	POL-BSFF-WITN-013-0000070
10.	POL00279838	Table of Changes to Operational Processes dated 5 July 2019	POL-BSFF-0117901
11.	POL00448808	Post Office Limited's Audit, Risk and Compliance Committee Report dated 26 January 2021	POL-BSFF-WITN-017-0032971

No.	URN	Document Description	Control Number
12.	POL00401622	Minutes of Post Office Limited's Audit, Risk and Compliance Committee dated 30 March 2021	POL-BSFF-0228292
13.	POL00448669	Board minutes of Post Office Limited dated 30 March 2021	POL-BSFF-WITN-013-0000055
14.	POL00448792	Email from Ben Foat to Benjamin Tidswell, Carla Stent and others, re: Inquiry Hearing dated 07 October 2022	POL-BSFF-WITN-005-0008848
15.	POL00448813	Board minutes of Post Office Limited dated 29 October 2019	POL-BSFF-WITN-022-0000196
16.	POL00448667	Board minutes of Post Office Limited dated 26 January 2021	POL-BSFF-WITN-013-0000046
17.	POL00448797	Board minutes of Post Office Limited dated 26 October 2021	POL-BSFF-WITN-013-0000076
18.	POL00448809	Email from Veronica Branton to Tim Parker, Carla Stent and others, re: Postmaster Engagement dated 12 February 2021	POL-BSFF-WITN-017-0033798
19.	POL00448807	Letter sent by Amanda Jones via One News dated 05 January 2021	POL-BSFF-WITN-017-0032012
20.	POL00448795	Board minutes of Post Office Limited dated 27 October 2020	POL-BSFF-WITN-013-0000031
21.	POL00448670	Board minutes of Post Office Limited dated 03 June 2021	POL-BSFF-WITN-013-0000062
22.	RLIT0000201	The Times article dated 19 February 2024	RLIT0000201
23.	POL00447940	Board minutes of Post Office Limited dated 27	POL-BSFF-107-0000024

No.	URN	Document Description	Control Number
		September 2022	
24.	POL00448816	Post Office Limited's Audit, Risk and Compliance Committee report dated 30 March 2021	POL-BSFF-WITN-043-0000002
25.	POL00423919	Board minutes of Post Office Limited dated 06 December 2022	POL-BSFF-0238734
26.	POL00448814	Board minutes of Post Office Limited dated 09 February 2016	POL-BSFF-WITN-030-0000004
27.	POL00167384	Board minutes of Post Office Limited dated 30 June 2020	POL-0161324
28.	POL00448799	Board minutes of Post Office Limited dated 28 September 2021	POL-BSFF-WITN-013-0000081
29.	POL00448805	Post Office Limited's Change Assurance Report dated 28 February 2020	POL-BSFF-WITN-017-0019760
30.	POL00448798	Board minutes of Post Office Limited dated 03 November 2021	POL-BSFF-WITN-013-0000077
31.	POL00448815	Post Office Limited's Audit, Risk and Compliance Committee report dated 28 September 2021	POL-BSFF-WITN-042-0000007
32.	POL00448812	Email chain from Rubia Khanom to Carla Stent and others, re: POL ARA 2021-22 – For Information dated 17 August 2022	POL-BSFF-WITN-017-0047842
33.	POL00448800	Board minutes of Post Office Limited dated 24 January 2023	POL-BSFF-WITN-013-0000088