

Witness Name: Christopher Leach

Statement No.: WITN09630100

Dated: 19 September 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF CHRISTOPHER MICHAEL LEACH

I, Christopher Michael Leach, will say as follows:

INTRODUCTION

1. I make this statement in response to a request for evidence dated 11 May 2023 made by the Post Office Horizon IT Inquiry (the "**Inquiry**") pursuant to Rule 9 of the Inquiry Rule 2006 (the "**Rule 9 Request**").
2. I am submitting this statement with the aim of providing the inquiry with information which is a combination of facts I know to be true, some hearsay evidence and other information which are my honestly held belief. I believe that a significant amount of the content which I cannot fully evidence within this statement could be corroborated with both full and open disclosure from the Post Office (POL) and also through the inquiry seeking information from the correct locations and data sources.

PROFESSIONAL BACKGROUND

3. I currently hold the role of Head of Branch Technology Product Management. My remit

is now covering all Branch Technology excluding NBIT (which is the replacement platform for the Horizon.) I also temporarily held the role of Interim Head of Horizon Testing and QA which was ultimately to cover for around a 6 month period ending late 2023 after an individual left from the Horizon Leadership team. I have been employed by Post Office since 19th July 2021. Previous to joining Post Office I have held roles in Product Management and Innovation within companies such as Capita, NEC and Northgate Public Services and was also a Police Officer for around 10 years. I have significant experience within Platform replacement having been client facing lead within a previous organization during a high profile and politically sensitive platform replacement for several Police Forces

ROLE AND RESPONSIBILITIES

4. My role is not what I would typically call a Head of Product Management role – in that I control no budget, do not have direct management responsibility over other Product areas and my primary focus is, and always has been, to try and help the organization evolve into a more Product focused business and primarily to act as a gatekeeper to ensure that new development and Branch technology based changes are both beneficial to Postmasters, the network and do not circumvent necessary and sensible governance.

5. One of my primary responsibility's centers around the HSA or Horizon Solution Authority – later rebranded in 2024 to BTSA (Branch Technology Solution Authority) which I chair. This is a governance forum where any Branch Technology affecting changes should come through for approval. It has representation from all major stakeholder areas such as Postmaster Engagement, Security, Support, Product, Commercial, NBIT (Future platform) Architecture and others. There is a clear emphasis on the findings of the Horizon Issues Judgement in this forum and I would describe it as acting like a

'conscience' for the business. There are terms of reference, and all sessions are recorded, and minutes provided after decisions have been made.

6. In honest reflection I would say that I have not achieved what I had hoped in the time that I have been part of POL. It is a highly complex and overly complicated organization with many overlaps in people's responsibilities. I would also say that although I have introduced some more modern, efficient and beneficial ways of working, I am often unable to make them mandatory practice and as such there is still significant improvement needed across POL which is very slow to evolve.
7. From a testing perspective my role was to lead the Horizon Testing and QA function, seek out and where possible make improvements and provide greater confidence that our Postmasters are receiving quality changes within the technical limitations that we have. I have always encouraged the team to never be made to feel bad for finding bug errors or defects as can sometimes happen and the team have been responsible for significantly evolving the regression testing used in Horizon but also historical issues that have been present within the system for a significant period of time. As previously mentioned, this interim responsibility ended at the latter part of 2023.
8. My initial observations upon joining POL were that it was an extremely fractured organization with a huge number of detached business areas that often operated in isolation from one another. I was shocked upon seeing the lack of modern business practice ranging from pushing business change with minimal or no requirements, numerous examples of multiple people doing the same job, significant inefficiencies using computer systems which were both poorly implemented and deemed 'too costly' to replace and the lack in many parts of the business of giving any consideration to our postmasters. I found this extremely concerning, but also was cognizant of the fact that

POL was an organization which was in a period of evolution due to the Horizon scandal.

9. It was my opinion that commercial factors seemed to be far more important than other factors and there seemed to be virtual no understanding that Postmaster centric changes would in fact often by proxy, reap commercial benefit. Most of all, there felt like there was an overarching culture of being extremely reluctant to change and failure to properly acknowledge cultural issues.

10. Despite the significant and worrying issues within POL, this made me personally very invested in being part of the solution and helping to address the issues, not least as I was recruited to be part of genuinely fixing the issues which were highlighted as part of the Horizon Issues Judgement. I distinctly recall the occasion that I made the decision to commit my longer term future to POL when I asked why a process was so long winded, inefficient and illogical and was told by numerous people 'Welcome to Post Office.' This was perhaps the third or fourth time I had asked why we do something in what appeared to be in a nonsensical process and had received the same answer from different people. I found that my desire to change things for the better within POL made me into a 'marmite' character within the business where I either received real support or extreme challenge.

HORIZON REMEDIATION AND THE NBIT TEAM

11. It quickly became clear that the HSI workspace where I operated (Horizon Systems Improvement) was recognized for its importance within the HSI team, but from the wider business was often regarded as a hindrance, unnecessary and an unwelcome challenge to the status quo. It felt like the processes that were introduced to ensure that requirements were used, suitable governance was utilized, and the right questions being asked ultimately 'slowed down' the business and as a result there were regular and clear

attempts to circumvent processes set up by the HSI team. Some of these occurred when senior management wanted a piece of work being done and allowed work to be covertly prioritized by Fujitsu. I saw numerous examples of this.

12. There appeared to be a commonly held belief within the organization, reinforced by senior management such as NBIT Director Gareth Clark, Head of Networks Nick Beal and CDIO Zdravko Mladenov, that the replacement Platform was 'just around the corner' and often suggestions to fix and positively change the existing Horizon platform was deemed a waste of time and effort. I became concerned when making numerous inquiries about the accuracies of these claims and was being told by individuals within the SPM Programme (that was responsible for the NBIT platform) that it was ordered by Gareth Clark, Nick Beal and Zdravko Mladenov that they were to categorically state that NBIT would be live in 2025 despite it being fully understood that this was in no way possible or realistic.

13. I began to suspect that the new platform (NBIT), was not 'in a good way' and that the management of and build quality of this platform was questionable when I made 14 different attempts to see a Roadmap for the platform, documented strategy and any visibility of its user interface. There was clear evidence of 'in-fighting' and it became apparent that anyone that did not agree with Gareth Clark would be quickly removed from the Programme – an occurrence which I have witnessed on a number of occasions.

14. I remember that I made several attempts to build bridges with individuals within the NBIT team and was regularly met with blockers and a refusal to collaborate. A couple of examples of these behaviors include when I had tried to set up regular calls with individuals within the NBIT assurance space to ensure that they were not making the

same mistakes again as were identified in the Horizon Platform. I started out having some very useful and fruitful calls with Thomas Tedman who worked in this space for NBIT. He quickly started to grasp some of what was learnt from Horizon - that could be evolved and fixed properly in NBIT but he was soon ordered by Friederike Vetter, who worked for Gareth Clark to not have any further involvement with the Horizon remediation team. Mr Tedman would be able to corroborate this.

15. We continued to speak despite this as our mutual concern was so great that NBIT was again making huge and significant mistakes in its design, distinct lack of postmaster engagement, culture of secrecy and my honestly held belief was that this was in many ways even worse than the individuals responsible for the issues in Horizon as the NBIT leadership also had the findings of a Horizon Issues Judgement and the Horizon team to use as a 'sense check' to ensure they were doing things in a better way. It was my belief that they actively ignored recommendations and offers to assist by the Horizon team. I also was deeply concerned that NBIT was clearly stated as being a 'like for like' replacement of Horizon and the opportunity to truly innovate and produce an altogether improved platform was being missed.

16. Another example occurred when I raised concerns stating that we should be sharing roadmaps, committed scope and information with our postmasters, never mind our internal stakeholders but was told this was not in my remit. I also raised concerns that an over reliance on contractors added to an apparent strategy of withholding visibility of NBIT and prevented opportunity to allow for input or help from permanent staff members. I believed this created a 'perfect storm' scenario for the following reasons: -

16.1. Significant overreliance on contractors – causing both significant financial strain, and a lack of 'skin in the game' whereby it was often not in the personal

interests of some contractors to conclude their work in a timely manner.

16.2. We had significant risk around retaining knowledge as very few permanent staff members were involved and as contractors left, they took experience with them.

16.3. The principle of simply recreating Horizon in a newer tech stack was flawed and missed the massive opportunities available to us to evolve as a business and improve things for our postmasters. It also ignored the opportunity to innovate.

NBIT Leadership, Culture and Accountability

17. There are many examples of these behaviors which were driven by the three individuals leading the NBIT platform build, but one other that sticks in my mind from a testing perspective was relating to the fact that the Horizon Test and NBIT test teams were situated in the same building along the same corridor. When I took over the team, I told the team to extend every bit of assistance and collaboration to the NBIT team to break down some 'walls' which had been built up between the two areas of the business.

18. A driver in this was that I am a big believer in collaborating but also from a more practical perspective I was concerned that one day the Horizon Test team would be expected to take on the NBIT platform and would need to be empowered with as much knowledge as possible before that time. They also could provide a lot of value to the inexperienced NBIT testing team who were (I believe) completely contractor based and would often come to the Horizon test team to ask for guidance on Branch processes.

19. Ultimately, I ordered the team to adopt a clear open-door policy. This was unfortunately not reciprocated as the NBIT door was quite literally locked by order of Gareth Clark and Horizon team members were barred from entering. I had heard this from numerous

sources including staff from Accenture and I was around that time approached by one of my test managers Sarah Birch who was quite upset as she informed me that Gareth Clark when challenged about this attitude and order of a locked door, had accused the Horizon team of 'stealing items' from the NBIT team. This was both a ridiculous and unfounded accusation and in my opinion was symptomatic of the hyper aggressive attitude Gareth Clark took to any attempts to look at NBIT in anything other than an extremely controlled manner.

20. Two Accenture Test Leads named Andy McCallister and Dan Perrin both confirmed to me that they had been ordered by the NBIT Director - at that time Gareth Clark, to have zero involvement with anyone from Horizon.

21. These are just some of the examples of the culture of secrecy around NBIT, which I have absolute belief was driven by the fact that I felt that the platform was clearly being poorly managed and misrepresented in its governance and reporting of its spend, progress, bugs and defects and build quality to board. This led me to make some decisions regarding speaking to senior executives which I will refer to later in my statement.

Remediation of the Horizon Solution and the NBIT Platform

22. In addition to this it was also my opinion Horizon has been critically underfunded for some time and therefore budget which has been provided as part of the Horizon remediation has been looked at very critically. This was exacerbated by what I would describe as extremely bullish behavior from Gareth Clark and Nick Beal especially who would argue that Horizon was about to be replaced by NBIT in 2025.

23. I felt anger at this attitude because I received a lot of hearsay evidence saying that neither they nor Zdravko Mladenov believed this. As a result, decisions around Horizon

funding were in my opinion completely flawed as the assumption was that it was only ever going to be of any benefit until 2025.

24. My first experience with this was within the forums which took place called HDRF -which was the Horizon Design Review Forum chaired by Jeff Smyth. The purpose of this forum was to view analysis work done by the HSI team on problems and issues that had been identified and then discuss options. Consequences were examined and the options were either to do something about the issue now as part of Horizon remediation, to defer the problem to the 'BAU' business function, to wait for the NBIT platform or to do nothing.

25. I found this forum to be problematic because there ultimately was no 'BAU' function within the business so decisions pushed this way ultimately seemed to mean 'we will perhaps get round to it at some point in the future – funding permitting'. I also found the critical nature of NBIT senior management who would often object to any Horizon remediation was often done with a little too much vigor. It felt as if they were competing for the budget. The main individuals who made these representations to not do work on Horizon were Gareth Clark and Nick Beal. It is also my belief that both individuals were very much aware of the issues and concerns that many people within the NBIT space shared concerning the state of the platform and how many problems it had. The NBIT senior management would regularly make proclamations about NBIT going live across the estate in 2025. I was very much aware that this was not believed in the slightest behind 'closed doors.' I have seen emails and notes to this effect even going back to early 2022 so they should be both disclosable and findable for the inquiry.

26. The HDRF forum took an initial list of issues that were identified – a significant proportion of which could cause potential detriment to Postmasters and from memory only about

30% were approved to fix within Horizon. A significant amount was pushed to NBIT for them to address and others to 'BAU'. A small number were deemed to not be issues at all or something that we were commercially or contractually required to do.

27. Ultimately a list was created from HDRF and this was what was decided to be 'in scope' for Horizon remediation.

28. Around this time, I also recall bringing up the issue of usability on Horizon and suggested that making some user interface changes on Horizon in parallel with NBIT would not only improve the user experience for postmasters now, but also reduce risk in the retraining of a new system as the systems would be more similar.

29. I distinctly recall having this conversation with then NBIT Head of Product Brian Hogg, who was another contractor who has since left the business. I was quite disturbed when he made the comment (and had done so to others) that 'we did not want to make it so Postmasters don't want to change to NBIT' or words to that effect. This made it very clear that what would benefit postmasters was far from a priority to the NBIT leadership.

30. I was also later involved along with Horizon Programme Manager Wayne Little and Horizon Chief Architect Sally Rush in an exercise working through all the items for remediation which essentially revisited the HDRF decisions in the summer of 2022. This involved the three of us working together to explain in 'layman's terms' what each potential change meant, whether it could feasibly cause detriment, financial or otherwise to a postmaster and to ultimately report back to the senior management to make decisions on this.

31. Solicitors from Norton Rose Fulbright (NRF) were used to give us clear criteria to

benchmark our work on. This included clarification on what constitutes financial detriment for example, so we had a steer on how to prioritize items. I distinctly recall having some rather long and challenging calls with NRF whereby I questioned the difference between potential financial discrepancy and actual financial discrepancy, and also about what I called the chain of causation where it was my belief that other issues not covered via their own definition of financial discrepancy could in fact ultimately result in financial discrepancy after a plausible series of events.

32. Ultimately, we followed the definition to the letter under the instruction of Dan Zinner, who at that time was heading up this piece of work. I do not recall exactly what role Dan Zinner had in the organization at that time as I had previously believed he had left, but he was what I would describe as extremely aggressive in challenging NRF definitions, and it felt like he was working to reduce the scope of the work that would need to be done. I also recall stating on a call with him and the rest of the team that it was my belief we should be making all the changes we have identified. This was categorically and robustly rejected by Dan Zinner. I made a note of this at the time and can provide it to the inquiry if required.

33. Ultimately Sally Rush, Wayne Little and I provided a list to a senior team including Dan Zinner, Tracy Marshall, Chrysanthy Pispinis and Tim McInnes with recommended changes based on the criteria given to us by NRF – including risk of financial detriment and an opinion on if the Postmaster could have realistically identified the loss – amongst other criteria.

34. It was clear to me that the suggested scope of work was not popular within the senior management and then a further exercise was undertaken by Tracy Marshall (representing Retail) and Chrysanthy Pispinis (representing Commercial) whereby the

list of suggested remediation items was significantly reduced. It felt extremely clear to me that Tracy Marshall was leading this piece of work.

35. The findings of this scoping exercise were also discussed on a call on Friday 2nd September 2022 where then Horizon IT Director Simon Oldnall and I were in a room in the Chesterfield Post Office building and Sally Rush joined from a meeting in London. Also present remotely were Tim McInnes, Chrysanthy Pispinis, Tracy Marshall and Jo Welch. I remember clearly that Tim stated on this call that we are 'not doing what we should, but what we can afford.' I made a note of this at the time and believe from conversation that Sally Rush and Simon Oldnall also did. I do not recall this appearing in the meeting notes made afterwards.

36. As part of my role, I became a little more involved with dealing directly with Fujitsu in March 2023 and that was primarily speaking with Jon Dowell (Horizon Programme Manager) and Dan Walton (Delivery Executive). This was to talk about our priorities which had a rough 4-tiered approach as decreed by Jeff Smyth. These were: -

- 36.4. Horizon Remediation work
- 36.5. Belfast fortification – including audit sans
- 36.6. BAU – any other Horizon work
- 36.7. NBIT related

37. I found that Fujitsu were not at all used to or comfortable with the questions I was asking concerning their own lists of work, what staff they were using on different pieces of work and breakdown of costs. Some of the amounts which were quoted were what I would call staggering figures, and it was extremely challenging to get visibility on any breakdown or 'science' behind the quotes. I raised this concern to our commercial team

and was told that the contracts in place between Post Office and Fujitsu were very restrictive and did not allow Post Office to get as much visibility as I would have liked.

38. I also distinctly recall speaking to both Dan and Jon whilst frustrated at the costs and timescales that were being quoted. It was explained to me that the Post Office account for Fujitsu was one which had limited numbers of people, many of which with any real knowledge of the system moving into retirement and it was not a popular account for Fujitsu staff to move into due to the old technology being used. I stated that talking openly with them, I felt that Post Office was being treated as a pure 'cash cow' by Fujitsu and that if it was me sat on the 'Fujitsu side' then I would fully expect an instruction for work quotes to be extremely high with minimal work in return as it is not in Fujitsu long term interest to be particularly helpful where there is so little accountability due to lack of visibility or rationale needing to be shown concerning quotes. I recall Dan shrugging his shoulders and he and Jon did not confirm my suspicions, but neither did they dispute them. Sally Rush was also present on this call.

Raising concerns about Horizon Remediation and the NBIT Platform

39. I have attended the Horizon Inquiry in person on a few occasions and it was during one of these occasions that I sat next to Al Cameron, Chief Finance Officer for Post Office. During this time, I took opportunity to speak to him about some of my concerns about:

- 39.1. Lack of funding towards remediating Horizon
- 39.2. Mismanagement and perceived dishonesty from NBIT management around progress, scope and issues

40. I also thought that it may be an opportunity to try and speak about what I perceived as a lack of innovation, concerns about training strategy for NBIT and opportunities around

introducing a concept I had drafted called the Postmaster Covenant which I believed would go a good way towards fixing cultural issues within the business. Ultimately, I wanted to present issues to him but also solutions.

41. For reference – the Postmaster Covenant which I also sent and later discussed with Nick Read on a 1-2-1 call on 23rd June 2023 was summarized below: My proposal for the Postmaster Covenant was to gain representation from the NFSP along with any other Postmasters who wished to sign the agreement assuring that POL will make all endeavors to adhere to the conditions listed below. POL will act expeditiously in our communications with Postmasters should it be assumed that POL be unable to fulfill any of the conditions.

41.1. Our new platform will NOT go live without having at least the same functionality to support branch profitability as is within the end-of-life Horizon platform. POL will endeavor to deliver greater, richer functionality supporting branch profitability within the new platform within the first 6 months of go-live than will exist within the sunset version of Horizon.

41.2. POL will look to support Postmasters through online assistance via shared screen (recorded remote assistance) to help postmasters who struggle with the new platform. (15 of 16 postmasters I spoke to told me that they were very concerned about learning a new system and I was concerned about the current NBIT approach to training.)

41.3. POL will provide timelines and scope to Postmasters around exactly what will be delivered within the new platform and when via a remote access live roadmap. This will form the baseline for the understanding of postmasters around the new platform and also have an ideas portal where ALL postmasters will be able to help shape their future platform, the products offered, strategic direction and truly feel that they have a voice.

42. My thought process was that the content within this 'covenant' would address my major concerns for the NBIT platform and that by pushing this to Al Cameron and Nick Read that their endorsement (or not) would indicate their level of awareness, understanding and knowledge around the problems NBIT were clearly facing. The ideal situation for me would be that this would be presented as a means to get NBIT back on track and enhance trust in Post Office by being transparent about the current status, scope and timescales of the new platform.

43. I met with Al Cameron at his office on 31st May 2023. It was just a one-to-one meeting. The first thing I established was if he was happy having a very open and honest conversation which could include sensitive content. He agreed. He asked what my concerns were and I firstly stated that I believed that the funding provided around Horizon remediation was insufficient and that was should be fully remediating the platform for three primary reasons, namely that it was entirely the correct thing to do for the postmasters, that the cost to fully remediate Horizon based on the criteria taken to HDRF was roughly equal the cost of two months of the NBIT Programme and that NBIT was extremely likely in my opinion to be significantly late from the information I had seen and heard.

44. I also pointed out that hundreds of postmasters retire or leave each year and every year we delay fixing issues for them was another huge set of postmasters we were 'writing off'.

45. Al then stated that he fully supported any decisions made by Tim McInnes relating to funding granted to the remediation of Horizon. He also asked what concerns I had about the NBIT Programme.

46. I stated that I had been told by several people on the NBIT Programme that the 'reality' of the state of the platform was far worse than what was reported. There was talk about hiding bugs and issues and relaxing security requirements to ensure that delivery dates were met. I knew that Zdravko Mladenov and Gareth Clark had both gone against robust security opposition to going live with a NBIT release. I had been informed this by Dean Bessell who was the acting CISO. I also knew that this was likely bonus related as Gareth had actually said so on meetings and I had been told by individuals who did not want to be identified who were there in person. As such this is hearsay. I stated I was extremely concerned about what I understood to be the training strategy which ultimately meant there was a plan to remotely train postmasters and if they didn't do it or pass, then they simply would not have access to the system. This shocked me and I stated that I fundamentally did not agree with this strategy.

47. I stated that the lack of innovation was concerning as the opportunity was there to do so much more with a new platform build and outlined a high level plan around how Post Office could begin to emulate successful organizations such as Swiss Post. I said I was deeply concerned about the proportion of contractors on the NBIT Programme and the dangers that could create. I also asked him if he was aware that there was technology that would be used within NBIT that exists currently within Horizon and the perception of a fully new technical build was not entirely correct. I had been informed of this by Chief Architect Sally Rush who was adamant about this. He stated that he did not believe this was the case. I asked what a solicitor within the inquiry would say if he stated his belief that NBIT was an entirely new technical solution and did not use any parts of the existing Horizon platform and if this was later shown to be incorrect. He did not respond.

48. I also asked if there were plans for an e-forensic assessment to perform due diligence on NBIT if NBIT data was to ever be used in future to support prosecutions. He did not

know. Al Cameron did not speak much concerning NBIT but did say that NBIT was the only option for Post Office and without it he indicated that Post Office would cease to exist. I distinctly recall him using the term 'NBIT or bust.' I stated I did not agree with this and there were other options available to us. The conversation became fairly heated when I stated that I felt that many people in the senior leadership of the Post Office were sharing this sentiment more because of the fact they did not want to admit to making a £250 million mistake and it was much easier to say it was the only option. I stated that I felt that he and others were 'doubling down' on a bad decision. I likened it to the Horizon scenario where senior leadership had apparently taken a view of 'we have spent too much to stop now.'

49. He stated that he supported the training strategy to which I replied that with all due respect he would not be here in Post Office to have to face the consequences of that decision. I disagreed saying that I (and others) felt that other options were available such as an evolution of the current platform – considering the level of problem diagnosis we now had or indeed a procurement of a solution akin to ones used by Swiss Post or other commercial off the shelf platforms.

50. The conversation then moved again to current Horizon remediation, and it was again stressed to me that we were to keep the conversation from ever leaving the room. He stated that 'We have a problem with Simon Oldnall' and he asked for my opinion and the job Simon was doing. I understood this to be a request for information or support to undermine Simon Oldnall who I knew was regularly making reservations and appeals for greater emphasis and funding towards remediating Horizon. He was also raising what I felt were entirely legitimate concerns about NBIT circumventing governance and some of the decisions being made.

51. I stated that Simon Oldnall was in my opinion a person of great integrity and was one of the few senior managers in my opinion who was acting for the benefit of the Postmasters first and foremost. I said it was my opinion that the organization needed people like Simon to address what I believed to be a toxic culture. It was extremely clear to me that this was not what Al Cameron wanted me to say, and it also became clear that he then wanted to conclude our meeting expeditiously at that point.

52. I also stated to him that whilst we were both speaking freely that I felt that he and a number of others had adopted a stance of both 'seeing no evil and hearing no evil' relating to NBIT issues and mismanagement and again mentioned that he was 'doubling down on a bad bet'. These were the exact words that I used, and I explained that I felt that many individuals would not or could not acknowledge the wrongdoing, mismanagement and spend on NBIT without admitting that they were wrong. Our meeting then concluded.

53. I also had a one-to-one with Nick Read which was done remotely on 23rd June 2023 and was arranged after I messaged him wanting to speak about the same concerns which I outlined to Al Cameron.

54. Ultimately my driving factor in doing this was to have a clear conscience about what I felt was almost criminal misspending of public money and an enormous, wasted opportunity. I had seen a clear culture of not wishing to 'upset the apple cart' within the Post Office and did not and will not be part of that culture. At this stage I had also heard internal sources within the SPM Programme that there was some very unusual activity around spend and some of the contractors who were being employed who were 'friends of friends' - particularly ex-McKinsey colleagues of Zdravko and also from individuals within the business effectively building empires within their business areas by seconding

people onto the Programme and then backfilling the roles with permanent staff so that they could effectively increase their remit.

55. I said to Nick Read that I believed that he and the board were being misinformed by the NBIT management – specifically Zdravko Mladenov and Gareth Clark- concerning the realities of what was happening within the Programme and the state, spend and scope of the platform. I received this information from many people within the NBIT team who asked me to remain anonymous. I had been informed that security related requirements were being relaxed and that scope was continuously being reduced and that contributory factors to this included the Accenture spend and also individuals being able to receive personal bonuses based on NBIT delivery related objectives. Again, I relayed all this to Nick Read.

56. I asked him if he was aware that the 'Go-Live' NBIT platform had been confirmed to have significantly less functionality, product offerings and capability than Horizon due to the refusal of the NBIT management to commit to adding in capability which was being worked on within Horizon. He said he was not. I asked how that would look when the decision directly contradicts the number one priority of the Post Office of improving branch profitability or the number two priority of rebuilding trust. Or the number three priority of transforming technology - presumably for the better. Nick asked me what I would do if I was in his situation and the exact words I used were 'I'd be pissed off and hold people accountable' I was speaking about my belief that he was being misinformed about the state of the NBIT platform, and that I would perform a 'deep dive' into my options as the conversation with him suggested that he did not feel that he was being presented with different realistic options.

57. After our meeting concluded I spent some weeks waiting for actions to take place as

Nick had assured me that he will be acting upon this information. At that time, I was hopeful of perhaps POL 'turning things around.'

58. It was not long after this that I became aware of investigations that took place into Gareth Clark and Zdravko Mladenov and I provided content to internal investigators. I also was aware of a number of other individuals who had been approached - mostly as they had told me personally on a one to one basis. By this time - my rather vocal opposition to some of the activities taking place had led me to be approached by some people within POL who I think saw me as a like-minded justifiably concerned individual. Others clearly were not happy about my being open with my opinion.

59. Gareth Clark left the business very suddenly whilst this investigation was nearing its conclusion and a number of other people within the NBIT space also left although I remained confused by the lack of control over the target operating model under Zdravko which consistently allowed individuals who were permanent staff members to leave and then contract at POL. One individual who moved from permanent to contractor was Ben Cooke who was a Director in the digital space. I found this very unusual as my understanding was that he had been deemed responsible for some significant security breaches allowing access of sensitive content overseas. Ben Cooke left not long afterwards.

60. In August 2023 we had a new Chief Transformation Officer named Chris Brocklesby join the business. My understanding was that he was and remains a contractor and reports directly to Nick Read. Zdravko Mladenov then reported to Chris and my belief at the time was that he was going to make an assessment with the assistance of Accenture on the state of the NBIT platform with a view to whether or not to continue. I was perhaps overly suspicious of this activity as Accenture were responsible for the NBIT build and as such it felt a lot like they would be 'marking their own homework' and I was aware that

Chris Brocklesby had been a partner in Accenture in the past.

61. Regardless of this, the Programme continued despite what became more and more vocal opposition from both within the NBIT team and within other areas of the business which became even more confusing to me when I had heard that a provider called Escher, who had been a bidder on a procurement exercise I had been involved with nearly 2 years before, had approached POL and said they could fully replace Horizon and also remove the need to further extend the supplier relationship with Fujitsu for under £30 million.

62. I was well aware that the costs of finishing NBIT as well as extending with Fujitsu due to the new expected go live date of 2028 was likely to be over £1 billion. I simply could not understand the decision making around the continuation of NBIT - especially considering the fact that at that stage they had significant credibility issues around their reporting, had significantly overspent, and their build quality was by all accounts regarded as very poor. They also had very serious defects which they were not particularly transparent with the wider business around.

Statement of Truth

I believe the content of this statement to be true.

Signed :

GRO

Dated :

19th September 2024