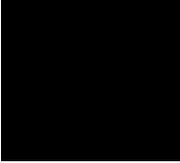




HERBERT
SMITH
FREEHILLS

Strictly private and confidential

Second Sight Support Services Limited



Herbert Smith Freehills LLP
Exchange House
Primrose Street
London EC2A 2EG
T +44 (0)20 7374 8000
F +44 (0)20 7374 0888
DX28 London Chancery Lane

Our ref
2066/9100/31043642

Date
07 December 2021

By email

Dear Sir or Madam

Post Office Horizon IT Inquiry – Confidentiality and privilege

We write on behalf of Post Office Limited ("**POL**"). We refer to Mr Ian Henderson's oral submissions to the Post Office Horizon IT Inquiry (the "**Inquiry**") during the preliminary hearing held on 8 November 2021. In those submissions, Mr Henderson indicated that Second Sight considers itself constrained in its ability to interact openly with the Inquiry by obligations it owes to POL under certain agreements to maintain confidentiality and not publicly to discuss its work. We understand the agreements to which Mr Ian Henderson referred to be engagement letters entered into by Second Sight and POL, as well as non-disclosure agreements between POL and particular Second Sight personnel, including Ian Henderson, Ron Warrington, Kim Evans, and Chris Holyoak.

POL is committed to cooperating with the Inquiry openly and transparently and to assisting the Inquiry in fulfilling its Terms of Reference. Accordingly, to the extent Second Sight (including its current or former personnel) remains bound by obligations to POL to maintain confidentiality or not to discuss its work publicly, we confirm that POL consents to release them from those obligations for the purposes of disclosing material to the Inquiry, making any submissions to the Inquiry and/or giving evidence to the Inquiry to assist the Inquiry in fulfilling its Terms of Reference. However, in respect of any information that may be subject to legal professional privilege, Second Sight must seek POL's written consent before providing such information to the Inquiry. This is to ensure that legally privileged information is disclosed to the Inquiry in accordance with the terms of POL's approach to waiver of legal professional privilege (as set out in its submissions to the Inquiry of 15 November 2021 and published on the Inquiry's website).

Yours faithfully

Herbert Smith Freehills

Herbert Smith Freehills LLP

cc: Post Office Horizon IT Inquiry

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