

Horizon Scandal Fund Grant Funding Policy

1. About this Policy

1.1. This policy applies to Horizon Scandal Fund a charity registered in England and Wales (number [REGISTERED NUMBER]).

1.2. The charitable objects of the Charity are:

Such purposes for the public benefit as are exclusively charitable according to the laws of England and Wales as the Trustees may from time to time determine, in particular (but not exclusively) the relief or prevention of hardship, poverty, sickness and distress among those people affected by the conduct of Post Office Limited and/or those associated with Post Office Limited in connection with a computer accounting system commonly known as Horizon.

1.3. The Charity is governed by the charity trustees of the Charity (“Charity Trustees” or “trustees”) who have a duty, acting at all times in the best interests of the Charity, to apply the Charity’s assets to advance the Objects and have ultimate responsibility for all grant-making decisions.

1.4. The purpose of this policy is to set out the principles and procedures that guide the Charity Trustees when they are making grants to further the Objects. It also provides information about the Charity’s grant-making process to anyone who is applying to the Charity, or would like to apply to the Charity, for a grant.

1.5. In this policy references to persons who are “connected” with a Charity Trustee mean:

- (a) a child, stepchild, grandchild, parent, brothers or sister of a Charity Trustee;
- (b) the spouse, unmarried partner or civil partner of a Charity Trustee or of any person falling within paragraph (a) above;
- (c) any person who is in a business partnership with a Charity Trustee or any person who is in a business partnership with any person falling within paragraph (a) or (b) above; and
- (d) any company, business, trust or organisation in which a Charity Trustee (or any other person connected to them) has an interest as a beneficiary or through ownership, control or influence.

2. Principles applied in determining support

2.1. The trustees (or their nominees) will consider applications from any Subpostmaster/Crown Office worker/Post Office manager/Post Office counter workers or assistants (in any type of Post Office branch) or members of their immediate families (hereafter described as “eligible applicants”) based in England, Scotland, Northern Ireland or Wales, who fulfils any of the following criteria:

- (a) Those who have not received Post Office/Government financial support (the Horizon Shortfall Scheme and the Interim Compensation Scheme).
- (b) Those who are eligible for Post Office/Government financial support but whose compensation does not cover the costs of their requirements.
- (c) Those who are eligible for Post Office/Government financial support but who have urgent need for support before the date on which their compensation is expected to be paid.
- (d) Those who are pursuing malicious prosecution claims.
- (e) Those who are suffering from mental/physical health issues relating to the Horizon scandal.

- (f) Those who are seeking to have their criminal convictions quashed.
- 2.2. Each request will be considered on its own merits.
 - 2.3. The trustees will carry out sufficient due diligence to ensure that the request or situation meets both the charitable purposes, and the principles in determining support set out in this policy.
 - 2.4. The trustees will carry out sufficient due diligence on any potential beneficiary to ensure:
 - (a) The identity of the beneficiary;
 - (b) That funds are applied in accordance with the charity's charitable purpose;
 - (c) That funds are not knowingly used for:
 - (i) Money laundering in accordance with the operative Money Laundering regulations;
 - (ii) Terrorist financing in accordance with the Terrorist Act 2000;
 - (iii) Bribery in accordance with the 2010 Bribery Act.
 - 2.5. Grant size will be an important risk factor and the larger the grant the greater will be the likely level of due diligence undertaken.
 - 2.6. Where the proposed beneficiary is well known to the trustees and the bona fides of the proposed beneficiary have long been well established, the amount of due diligence undertaken is likely to be reduced.
 - 2.7. Where the trustees consider appropriate, support may be offered in the form of a loan rather than a grant. For example (without limitation) where the proposed beneficiary is within criterion 2.1.(c) above, a loan might be appropriate. Without limiting the trustees' discretion, it is anticipated that loans will normally be interest-free and will be repayable only after the beneficiary has received compensation from Post Office/Government..

3. Grant application process

- 3.1. For smaller grants up to £100, requests may be made informally. Where specific needs or situations are known, grants may be made at the discretion of the trustees without any form of request.
- 3.2. For larger grants up to £1,000, applications should be in writing to the trustees. The application should make clear:
 - (a) the purpose of the proposed grant including the way in which the grant will be applied;
 - (b) the person(s) responsible for the management of the grant and for overseeing the work (if applicable, for example if a lawyer is engaged).

4. Administration

- 4.1. With the agreement of the charity and the beneficiary, grants will be provided by means of an electronic banking transfer or a cheque. The charity's normal payment authorisation process will be applied to any payments.
- 4.2. Where the grant is for a specified project or purpose, and in situations where that purpose does not proceed or where any grant or part thereof remains unused, unused funds must be returned.
- 4.3. Where formal written applications have been received, or other records maintained, these will

be stored and subsequently disposed of in accordance with the charity's policy on data protection and prevailing Data Protection legislation.

5. Decision making

- 5.1. The decision of the trustees on whether to award a grant is final.
- 5.2. The trustees are not obliged to provide an explanation to applicants in the event that their application is not successful but may decide to do so on a case by case basis. Applicants will be able to resubmit an application with further evidence if an application is declined.

6. Grants to Charity Trustees or connected persons

- 6.1. Article 9.2 of the Charity's articles of association authorises a Charity Trustee or any person connected to them to receive a benefit from the Charity as a beneficiary of the Charity, provided that it is available generally to the Beneficiaries of the Charity.
- 6.2. If an application for a grant is made to the Charity by a Charity Trustee, or a person connected to them, the non-conflicted Charity Trustees may therefore consider making the grant in accordance with this policy.
- 6.3. If a Charity Trustee, or a person connected to them, applies for a grant the conflicted Charity Trustee must:
 - (a) absent themselves from any discussion of the grant application by the non-conflicted Charity Trustees; and
 - (b) have no vote and not be counted as part of the quorum in any decision of the non-conflicted Charity Trustees on the grant.

7. Reviewing and amending this policy

- 7.1. This policy will be reviewed by the Charity Trustees as and when they consider it appropriate to do so but typically at least once a year.
- 7.2. The Charity Trustees may vary the terms of this policy from time to time.