## Addendum Witness Statement of Roberta Brownlee

I, Sarah Roberta Brownlee, will say as follows:-

I wish to make the following amendments to my existing responses dated 29 November 2022, to Section 21 Notice number 105 of 2022

- 1. At WIT-90872 para 28 I state that 'The second telephone call with Richard Pengelly was late September, again cannot recall the exact date and I did not take notes. This should state 'The second phone call with Richard Pengelly took place on 26 October 2020. I have received my telephone records from Vodafone, and they confirm that I rang Mr Pengelly on his mobile at 11.37am and that the call lasted 7 minutes and 18 seconds. I did not take notes on this call.
- 2. At WIT-90874 para 29 I state that 'I attended the Board meeting on 22 October 2020. I had sent an earlier email to the NEDs and the CX explaining I planned to attend this meeting and declared my interest (Exhibit RB-02). The decision to attend was influenced by the second conversation I had with Richard Pengelly, in late September 2020, referenced to above at Q28. I was mindful of my obligations and accountability as Chair of the Board. This should state 'I attended the Board meeting on 22 October 2020. I had sent an earlier email to the NEDs and the CX explaining I planned to attend this meeting and declared my interest (Exhibit RB-02). I was mindful of my obligations and accountability as Chair of the Board.
- 3. At WIT-90884 para 42(i) I state that 'I attended the October 2020 Board meeting after having had a telephone call from Richard Pengelly (as referenced earlier) I sent an email to the CX and NEDs explaining why I was attending. I was not at the September meeting on this Urology item as Pauline Leeson Chaired this. As I have said above, Richard Pengelly phoned me in late September and then I attended the October meeting because of this phone call.

I now believe this timeline to be inaccurate and ask that this reference be removed from my S.21 responses.

Signed:

Dated:

16/1/2024

12 November 2020

Your account number

Personal Information redacted by the USI

Your invoice number

Personal Information redacted by the USI

Your plan and extras period 12 November to 11 December 2020

Your usage period 12 October to 11 November 2020





Roberta Brownlee's mobile number redacted by the USI



UK calls						UK calls							
Date	Time Phone number	Deglination	Duration NA marcs	Included?	VAT Inc	Date	Time	Phone number	Destination	Duration Management	(reclusion)	VAT	
Fri 23 Oct	Personal Information	Ultroble	00:02-26	Yes	0.000	Warr 26 Oct	10:12	Personal Information	LIK mobile	00:01:16	Yes	10.000	
Fit 25 Oct	redacted by	Voda/anemobile	00:02:24	162	60:000	Man 24 Oct	10.16	redacted by	Vecafene mobile	90/02/06	Ta	(0:000	The telephone call highlighted was a
Fr 23 Oct	11.97 the USI	Vacalone mobile	SD:00:05	Yes	£0 000 03	Mon 26 Oct	10.21	the USI	Yodelare mable	ED (T) (2)	Yes	10000	
Fel 23 Oct	11:10	Landline	00:00:04	Yes	(0.000	Mgn 26 Oct	11:37		UN mobile	00:07:18	Yes	19000	call from Roberta Brownlee to Richard
Fri 23 Oct	11:16	Landine	000425	Yes	10000	MAT 16 00	1134		Vegetone mobile	00:02:18	Yes	10.000	Pengelly's mobile phone. Annotated
Fn 23 Oct	13:43	Landine	00:14:08	Yes	60600	Mon 26 Oct	1200	-	Lindly	00:03:04	Yes	10 000	by the Urology Services Inquiry.
Lu 53 Oct	12:16	UK mobile	00:09:01	Yes	£0.000	Mon 26 Oct	12:04		Vocalitie mobile	00:05:07	Yes	10000	
F# 23 Oct	12:35	Landine	00:01:49	Yes	00003	Mon 26 Oct	13:21		Vadelonemable	00:13:51	Yes	60.000	
Fri 23 Oct	12:41	UK mobile	00:01:33	Yes	60.000	Mon 26 Oct	15:17		Vodalone mobile	00:00:03	Yes	10.000	
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