
From: Adam Voce <adam@g-cv.com>

Sent: 25 April 2017 08:32

To: George Eaton-Busfield <george@g-cv.com>

Cc: RAN Billings <billings@accounts.ransquawk.com>; Jason Earl <jason.earl@thejetgroup.co.uk>; Albie Turner <ast@pjmarksandco.com>; Aubrey Hayward <aubrey.hayward@ransquawk.com>; Pierce Dimmick <pd@pjmarksandco.com>; Neil Cameron <ndc@pjmarksandco.com>; Nicola Peters <nicolapeters@g-cv.com>; nicola.peters@ransquawk.com; nicola.anne.peters@gmail.com; Anita Darbar <anita.darbar@ransquawk.com>; Sarah Ranger <sarah.ranger@ransquawk.com>; Alec Baughan <alec.baughan@ransquawk.com>

Subject: Re: JET PAYMENT APPROVAL PROCESS (NPnote) - DURING MIGRATION OF RANSquawk & RELATED BUSINESSES & (APPROVAL FOR "RE: JET PAYMENT CONFIRMATION REQ'D – HMRC Mar 17 PAYE/NIC")

Agreed and approved

Adam

On 24 Apr 2017, at 22:21, [George Eaton-Busfield <george@g-cv.com>](mailto:george@g-cv.com) wrote:

RE: Below- Please Action:

-

- 1. JASON & ALL REALTIME ANALYSIS AND NEWS DIRECTORS** - PLEASE (RE)CONFIRM YOUR AGREEMENT TO, AND UNDERSTANDING OF, THE NEW PAYMENT & FINANCIAL APPROVAL PROCESS(ES) AS DEFINED FOR **THE JET GROUP & J E TRADING** BELOW (or any subsequent name for these same companies), AND TO BE ADOPTED FROM TODAY GOING FORWARD. Please reply with your approval(s) or otherwise to this email.. Thanks.
- 2. JASON**, PLEASE ENSURE YOU BRING THE SIGNED RESOLUTION TO THE OFFICE WHEN NEXT IN FOR FILING PURPOSES SO THAT WE CAN SEND IN TO THE AUDITOR (P J Marks) FOR GOVERNANCE & AUDIT PURPOSES.
- 3. NICOLA**, PLEASE ENSURE YOU INCLUDE THIS PROCESS IN YOUR PIDL PROJECT UNDER FINANCIAL PROCESSES. *PIDL = Process Improvement and Document Library” Project.
- 4. ALBIE, NEIL, PIERCE, STEVE** – PLEASE CONFIRM ALL UNDERSTOOD.

Hi Pierce, All,

IMPORTANT – JET APPROVAL PROCESS (NICOLA)

Yes I believe this is correct and the process that Jason and THE JET GROUP (via. J Earl Trading Ltd) have been adopting during the business migration period from RAN Ltd - pending activation of various other accounts and structures that I understand Jason and the JET companies' intend on implementing within their final "future proofed" formal organisational structure(s). E.g. New Lloyds bank accounts and such.

I further understand / recall that Jason and THE JET GROUP agreed that payments would need to be approved by two of Jason Earl, Aubrey Hayward, Adam Voce or Adam Linton or myself during this period of migration of the RANSquawk business from RAN Limited to JET in order to install strong governance processes and controls. This double signature requirement being one part thereof.

That said, this was recently discussed again with Jason and other directors and Jason has now formally resolved that for all payments from J E Trading Limited and / or THE JET GROUP that he wishes to follow the following process going forward from today's date - I will / I will ask Jason to forward you a copy of the resolution from JET in due course.

Albeit the process is virtually identical to that used previously and as described above, in detail and specifically it is as follows.

NOTE: This Process should now be followed for approval of all payments, from THE JET GROUP or J E Trading Limited going forward and until further notice - and again this is to support and facilitate both migration and the implementation of effective and appropriate financial controls and governance.

NOTE: Please further be advised that the company name(s) above may be changed in the near future - this is most likely to affect the J E Trading company only.

-

However, this approval process defined below is to apply, until further notice to the companies regardless of any name changes:

1. Payment request raised by an appropriate individual upon receipt of invoice.
2. Payment request sent to PJMarks - FAO of one or more of "Albie Turner / Pierce Dimmick / Neil Cameron / RAN Billings" – who check for appropriateness and accuracy against accounts / normal payments and quantum.

ast@pjmarksandco.com ; pd@pjmarksandco.com ; ndc@pjmarksandco.com ; billings@accounts.ransquawk.com)

(Directors of RAN or JET can be copied in or can be the raiser(s) of the initial request for payment at this point).

3. PJ Marks will then forward request to Jason Earl as the director of **THE JET GROUP and J Earl Trading Limited** AND any ALSO to any other director of these companies - as may be appointed in the future.
4. Simultaneously, PJ Marks will also forward request to Adam Voce (in the first instance) and George Busfield as the approved “2nd Approvers” during this period of migration and until such notice.

(inevitably JET will appoint its own persons in due course once suitable governance and financial controls have been implemented and adopted at JET).

(P J Marks will also at this point raise any concerns / indiscrepancies / or inaccuracies at this point to the relevant directors)

5. Subject to two approvers “approving” the payments raised, i.e. in writing or via email, (or by the first and / or second signatory utilising mandate authority electronically thereby authorising such to the same effect at the bank), then approval via this process, for two approvers from these three (as currently stand at today’s date) can be used to authorise and approve payments to an unlimited quantum.
6. In the event that no two signatories have been able to complete the authorisations required as defined within points 2 and 3 above within 72 hours of the payment request being made (e.g. subject to work commitments or illness or travel and such forth), AND additionally that no query or refusal of approval of any kind whatsoever has been made by any of the parties named in points 3,4 and 5 above, to any of the parties therein named, or any other director, accountant, auditor or secretary of the companies therein mentioned, THEN any other director of any of the same said companies named in said points 3,4 and 5 above, may act as a second signatory to approve and authorise payments. This includes for the avoidance of doubt Aubrey Hayward and Adam Linton as at today’s date and until further notice or until they cease to be a director of one of the said companies.
7. Note that in all circumstances the first approver must be one of the parties named in said points 3,4, and 5 above – i.e. Jason Earl, Adam Voce or George Busfield.
8. Subject to two approvers “approving” payments raised as detailed herein in points 6, 7 and 8, again either in writing or via email, (or by the first and / or second signatory utilising mandate authority electronically thereby authorising such to the same effect at the bank), then approval via this process, for such two approvers under this process as defined by these points 6,7 and 8 can be used to authorise and approve payment or payments with a total aggregated amount upto £50,000 in any 7 day period.
9. In practical and day to day terms this means payment approvals for all JET matters should be raised to Jason Earl and Adam Voce in the first instance - for their approval, *(with George Busfield cc’d)* – by PJ Marks or “a n other” suitably appropriate and senior representative of one of the above named three companies. In the event approval is not forthcoming from two of these parties within 72 hours then approval should be sought from Aubrey Hayward or Adam

Linton in accordance the process and policy defined in points 6,7 and 8 above.

10. In addition to these points above, given that Lloyds have as yet been unable to provide Jason and / or THE JET GROUP, and / or J Earl Trading with credit cards to facilitate the working capital of the businesses and / or facilitate the procurement, expense and business support processes needed and utilised for these two companies (noting also that experience at RAN Ltd informs that the process to do so is overly extensive, resource heavy, and requires extensive compliance activity and actions throughout a year in any case) Jason Earl and any other authorising entity as may be required hereby authorises that one nominated credit card may be effectively “pre-authorized” for Jason Earl, Adam Voce and George Busfield (in their own names subject to them having such a facility that they are willing to assign solely for company and business purposes), such that these one cards are authorised to be directly reimbursed from one of these companies bank accounts on a monthly basis in full, whereby subsequent audit and approval of any expenses and costs incurred on these cards can be approved in line with the policies defined above insofar as a in the event that no business use can be identified as being applicable then the card holder must reimburse the company (that had settled the card’s balance in full on that month) for that specific amount subject to such being requested by Jason Earl or the company in writing.
11. In the event that there is any dispute then given these personal credit card facilities are effectively being generously passed on and used to support THE JET GROUP and J Earl Trading limited during this migration period, and that ultimately any credit exposure is limited to one month credit facility as is applicable to the sum of the three individuals specified card(s), and that these individuals represent senior personnel who have demonstrated repeated integrity and trustworthiness over an extended period of time, Jason Earl and any other authorising entity as may be required hereby authorises that the companies (THE JET GROUP and J Earl Trading limited) shall bear the full liability without exception.
12. In the event that dispute and or inappropriate use of such credit cards by any individual is believed to be occurring then Jason Earl reserves the right to withdraw the authorisation and “Pre-Approval” as defined within points 10, 11 and 12 herein, subject to 90 days written notice to the individual(s) concerned.
13. It is noted that this pre approval and direct payment process defined within these pints 10,11, and 12 is adopted and implemented as described herein to replicate a process similar to the Lloyds credit card facility as was provided and useful to business continuity and progression at RAN limited and moreover to enable THE JET GROUP and J Earl Trading limited to facilitate migration to their “new business as usual (BAU)” processes, policies and structures noting specifically the external and competitive threats that are apparent in the industry (Competitors, Schneider, Compliance, Legal Actions and costs etc).
14. The nominated cards should be approved unanimously in writing by and for use by Jason Earl, Adam Voce and George Busfield and in each instance such authorisation should remain in full force and effect, at the credit limits specified AT THAT DATE ONLY and allocated to the nominated card at that time or a direct replacement thereof (but NO increased credit limit(s) are to be deemed authorised without a new and subsequent unanimous approval by the same process and persons as herein described.
15. In all other instances, persons connected and or incurring costs in the course of these businesses (THE JET GROUP and J Earl Trading limited) should incur costs in their own name and then complete an expense reimbursement form and attach the relevant receipts, in order to have such expenses promptly repaid. OR alternatively, request pre-payment by the relevant company if required.

16. It is an inherent understanding (and here firmly advised by George Busfield) that this credit card policy is to be adopted to support the migration period currently underway for THE JET GROUP and J Earl Trading limited and that Jason Earl and these companies should look to review and potentially replace these policies and authorisations once the companies have achieved and stabilised business as usual operations and structures.

17. The above processes and policies and controls are approved and adopted forthwith by Jason Earl and any other authorising entity as may be required, under resolution, and such supporting formal documentation will be sent to PJ Marks and / or filed appropriately forthwith.

**Please note that RAN Limited refers to Realtime Analysis and News Limited.*

Kind Regards

George

In a capacity as migration consultant to Jason Earl, THE JET GROUP and J Earl Trading.

-----Original Message-----

From: RAN Billings [<mailto:billings@accounts.ransquawk.com>]

Sent: 24 April 2017 14:19

To: George Eaton-Busfield <george@g-cv.com>; 'Jason Earl' <jason.earl@thejetgroup.co.uk>; Aubrey Hayward <aubrey.hayward@ransquawk.com>; 'adam.linton@ransquawk.com' <adam.linton@ransquawk.com>

Cc: Albie Turner <ast@pjmarksandco.com>

Subject: JET PAYMENT CONFIRMATION REQD – HMRC Mar 17 PAYE/NIC

Hi George,

As no secondary confirmation is required by Lloyds, we need written confirmation from yourself, Jason, Aubrey or Adam before making the following payments from Jet Group (via. J Earl Trading Ltd bank)

Amount: £12076.85

Supplier: HMRC

Purpose: March 2017 payroll paye/nic

Due date: 19/04/2017 - we will arrange immediate payment

PLEASE EMAIL TO CONFIRM THAT YOU ARE HAPPY FOR US TO MAKE THIS PAYMENT.

Regards

Pierce.

-----Original Message-----

From: Sarah Ranger [<mailto:sarah.ranger@ransquawk.com>]

Sent: 24 April 2017 11:52

To: RAN Billings <billings@accounts.ransquawk.com>

Cc: George Busfield <george.busfield@ransquawk.com>

Subject: Employer Record Payment Card (P32) Paid?

Hi Guys,

We have received the attached informing how much National Insurance contributions are due to HMRC by 19/04/2017.

Can you please confirm whether this has been paid through JET please?

Many thanks,

Sarah.

-----Original Message-----

From: 1393651@wework.com [<mailto:1393651@wework.com>]

Sent: 24 April 2017 11:56

To: sarah.ranger@ransquawk.com

Subject:

TASKalfa 3051ci

[00:17:c8:08:71:cf]
