Eastern Shires Purchasing Organisation

Government and Public Sector

September 2013

Report to those charged with governance and Annual Audit Letter

Report to the ESPO Management Committee on the audit for the year ended 31 March 2013 (ISA (UK&I)) 260)

Contents

Code of Audit Practice and Statement of Responsibilities of Auditors and of Audited Bodies

In April 2010 the Audit Commission issued a revised version of the 'Statement of responsibilities of auditors and of audited bodies'. It is available from the Chief Executive of each audited body. The purpose of the statement is to assist auditors and audited bodies by explaining where the responsibilities of auditors begin and end and what is to be expected of the audited body in certain areas. Our reports and management letters are prepared in the context of this Statement. Reports and letters prepared by appointed auditors and addressed to members or officers are prepared for the sole use of the audited body and no responsibility is taken by auditors to any Member or officer in their individual capacity or to any third party.

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An audit of the Statement of Accounts is not designed to identify all matters that may be relevant to those charged with governance. Accordingly, the audit does not ordinarily identify all such matters.

This report contains a summary of the results of our audit and matters which we ask the Management Committee to consider.

Executive summary

Background

This report tells you about the significant findings from our audit. We presented our plan to you in December 2012; we have reviewed the plan and concluded that it remains appropriate.

Audit Summary

- We have completed the majority of our audit work and expect to be able to issue an unqualified audit opinion on the Statement of Accounts and your value for money conclusion.
- The key outstanding matters, where our work has commenced but is not yet finalised, are:
 - approval of the Statement of Accounts and letters of representation; and
 - completion procedures including subsequent events review.
- Your draft accounts were submitted to us by the June deadline and were of a high quality. Supporting working papers were good and provided on time.
- Finance staff are always responsive and helpful. They are committed to the audit process and are always looking to improve.
- We did not identify any audit adjustments during our fieldwork.

Please note that this report will be sent to the Audit Commission in accordance with the requirements of its standing guidance.

We look forward to discussing our report with you on 26 September 2013. Attending the meeting from PwC will be Alison Breadon and Tom Gibbs.

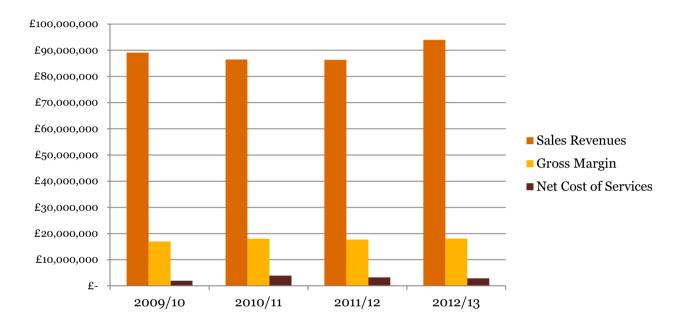
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Financial performance was strong during 2012/13, with revenue growth of 9%.

You recognise that to continue to grow revenues, the organisation must continue to expand into new markets and geographical areas.

Financial Performance Review

Sales Revenues, Gross Margins and Net Costs of Services



You have experienced revenue growth of 9% during 2012/13 to £94 million, representing a record year for the organisation.

You have recognised the need to mitigate the spending constraints on local authorities by marketing ESPO goods and services to a broader audience and new geographical areas. This will be important to achieve continued growth in 2013/14.

You continue to achieve a net cost of services surplus which enables the organisation to invest, build up usable reserves balances and pay dividends to member Authorities.

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Our Audit Approach is risk-based.

We utilise a range of technology to support what we do, including data auditing, bespoke delivery centres and out cutting edge Auditing software 'Aura'.

Audit approach

Smart People

We continue to deploy our best people on your audit, supported by a substantial investment in training and in our industry programme.

Smart Approach

Centre of Excellence

We have a Centre of Excellence in the UK for Local Government which is a dedicated team of specialists which advises, assists and shares best practice with our audit teams in more complex areas of the audit.

Our team has been working side by side with the Centre of Excellence to ensure we are executing the best possible audit approach.

Delivery centres

We use dedicated delivery centres to deliver parts of our audit work that are routine and can be done by teams dedicated to specific tasks; for example these include confirmation procedures, preliminary independence checks and consistency and casting checks of the Statement of Accounts.

Benefits for the audit

The key benefits of our approach for your audit have been the use of our delivery centres which have reviewed in detail your compliance with the 2012/13 Code of Practice and IFRS Accounting Standards.

Smart Technology

We have designed processes that automate and simplify audit activity wherever possible. Central to this is PwC's Aura software, which has set the standard for audit technology. It is a powerful tool, enabling us to direct and oversee audit activities. Aura's risk-based approach and workflow technology results in a higher quality, more effective audit and the tailored testing libraries allow us to build standard work programmes for key local government audit cycles. The following pages highlight the risks we originally identified in our Audit Plan, and explain what we have done in response.

The risks presented here, Management Override of Controls and the Recognition of Income and Expenditure, are presumed to be significant risks under International Standards on Auditing.

Audit Approach to Significant Risks

We have summarised below the significant risks we identified in our audit plan and the audit approach we took to address them.

Risk	Category	Audit approach
Management Override of Controls In any organisation, management may be in a position to override the financial controls that are in place. A control preach of this nature may result in a material misstatement. For all of our audits, we are required to consider this as a significant risk and adapt our audit procedures accordingly. In your organisation, as the pressure to deliver savings increases, so does the risk of management override.	Significant Risk	 We have updated our understanding of your controls around journals and gained some assurance on the arrangements for dealing with staff leavers, in particular controls over physical security and access to financial systems. Our final accounts procedures included testing of: the appropriateness of journals processed during the year; key year-end control account reconciliations, including the bank reconciliation; transactions recorded after the year-end; significant accounting estimates; and performance of unpredictable audit procedures.

No issues were identified as a result of this work.

Risk

Category Audit approach

Significant

Risk

Revenue and Expenditure Recognition

There is a risk that the Committee could adopt accounting policies or treat income and expenditure transactions in such as way as to lead to material misstatement in the reported revenue and expenditure position. We have updated our understanding of relevant revenue and expenditure controls and reviewed the outcomes of internal audit work in order to establish whether these are operating effectively. Our final accounts procedures included testing of:

- the appropriateness of journals processed during the year;
- evaluation of accounting policies for income and expenditure recognition to ensure these are consistent with the requirements of the Code of Practice on Local Authority Accounting;
- significant accounting estimates;
- revenue and expenditure cut off at year end;
- rebates income from suppliers on a sample basis;
- a sample of routine income and expenditure transactions; and
- analytical procedures on income and expenditure at the year-end

No issues were identified as a result of this work.

This section of the report summarises the significant audit and accounting matters we have identified in our work.

You prepared your accounts to a high standard and the working papers were ready for audit on a timely basis. You have been responsive in answering our queries.

We anticipate issuing an unqualified audit opinion.

Significant audit and accounting matters

Auditing Standards require us to tell you about relevant matters relating to the audit of the Statement of Accounts sufficiently promptly to enable you to take appropriate action.

Accounts

We have completed our audit, subject to the following outstanding matters:

- approval of the Statement of Accounts and letters of representation; and
- completion procedures including subsequent events review.

Subject to the satisfactory resolution of these matters, the finalisation of the Statement of Accounts and their approval of them we expect to issue an unqualified audit opinion.

Accounts Preparation

You completed your draft accounts by the end of June, and provided them to us in advance of the audit as agreed. Our audit identified no material issues in the quality of the accounts presented for audit. Some minor disclosure issues were identified which have been discussed and have been amended appropriately.

We agreed in advance what we would need for our audit and this was ready for us when we arrived and in some cases in advance. The working papers were provided to us electronically and in hard copy. The finance team worked hard to meet the timescales and were helpful in resolving our queries.

Overall the Committee's accounting performance is to be commended and we would like to thank the team for their support and assistance during the audit.

There are no material accounting issues to draw to your attention. However, we have highlighted on the next few pages some of the key issues we have identified in our audit for you to consider.

The level of your reserves continues to be strong. This includes your General Fund and your Earmarked Reserves, which are held for specific future purposes.

We did not identify any accounting adjustments during the audit.

Accounting Issues

We identified no material accounting issues. We would however like to draw to your attention the following matters resulting from our work to assist you in fulfilling your governance responsibilities.

Gas Accruals

The Committee procures gas on behalf of its customers. Because ESPO does not have access to its customers' meters, accruing for gas used but not billed would be costly, and gas costs are therefore accounted for on a cash basis.

We checked that the volumes of gas used and the number of contracts is reasonably constant. On this basis the impact on ESPO's surplus is unlikely to be material because it is a small percentage of gas consumed. The approach adopted this year is consistent with previous years.

We ask you to confirm in the letter of representation (Appendix) that you are satisfied with the appropriateness of accounting for gas accruals on a cash basis.

Misstatements and significant audit adjustments

We have to tell you about all uncorrected misstatements we found during the audit, other than those which are trivial.

We can confirm that we did not identify any misstatements during the audit.

Significant accounting principles and policies

Significant accounting principles and policies are disclosed in the notes to the Statement of Accounts. We will ask management to represent to us that the selection of, or changes in, significant accounting policies and practices that have, or could have, a material effect on the Statement of Accounts have been considered.

Judgments and accounting estimates

The following significant judgments and accounting estimates were used in the preparation of the financial statements:

Valuation of non-current assets

The valuation of non-current assets is an area of significant judgement within the accounts. We have performed detailed work on assessing the valuation methodology applied by your professional valuer and the credentials of your valuations team. We found no areas to report in this context.

Accruals

Accruals for expenditure and income are raised where an invoice has not been received or raised at the year-end, but the Committee knows that there is a liability to be met which relates to the current year. This involves a degree of estimation. Detailed testing was performed on significant accruals. No misstatements were identified from this work.

Bad Debt Provision

Your Bad Debt Provision is calculated by assessing the potential recoverability of invoices which are beyond the due date for payment. There is an inherent level of judgement involved in calculating this provision, which is £164k as at 31 March 2013 (£145k as at 31 March 2012). We have considered the recoverability of debtors and have not identified any significant concerns in the way that you have calculated your bad debt provision.

Overall we found your significant judgements and accounting estimates to be reasonable.

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Eastern Shires Purchasing Organisation

We ask management to send us a letter of representation before we sign our audit opinion. A draft of that letter is included in Appendix 1.

We are required to demonstrate our independence by professional standards. Maintaining our independence is important to us in delivering you a robust external audit.

We have concluded that we are independent and comply with the relevant UK regulatory and professional requirements.

Management representations

The final draft of the representation letter that we ask management to sign is attached in Appendix 1.

Audit independence

We are required to follow both the International Standard on Auditing (UK and Ireland) 260 (Revised) "Communication with those charged with governance", UK Ethical Standard 1 (Revised) "Integrity, objectivity and independence" and UK Ethical Standard 5 (Revised) "Non-audit services provided to audited entities" issued by the UK Auditing Practices Board.

Together these require that we tell you at least annually about all relationships between PricewaterhouseCoopers LLP in the UK and other PricewaterhouseCoopers' firms and associated entities ("PwC") and the Committee that, in our professional judgement, may reasonably be thought to bear on our independence and objectivity.

For the purposes of this letter we have made enquiries of all PricewaterhouseCoopers' teams whose work we intend to use when forming our opinion on the truth and fairness of the Statement of Accounts.

Relationships between PwC and the Committee

We are aware of the following relationships that, in our professional judgement, may reasonably be thought to bear on our independence and objectivity and which represent matters that have occurred during the financial year on which we are to report or up to the date of this document.

Relationships and Investments

We have not identified any potential issues in respect of personal relationships with the Committee or investments in the Committee held by individuals.

Employment of PricewaterhouseCoopers staff by the Committee

We are not aware of any former PwC partners or staff being employed, or holding discussions in respect of employment, by the Committee as a director or in a senior management position covering financial, accounting or control related areas.

Business relationships

We have not identified any business relationships between PwC and the Committee.

Services provided to the Committee

The audit of the Statement of Accounts is undertaken in accordance with the UK Firm's internal policies. The audit is also subject to other internal PwC quality control procedures such as peer reviews by other offices. We have not undertaken any non-audit services at the Committee during 2012/13.

You are required to produce an Annual Governance Statement (AGS). We reviewed your AGS and found no areas of concern to report.

Fees

The analysis of our audit fees for the year ended 31 March 2013 is included later in this report.

Services to Directors and Senior Management

PwC does not provide any services e.g. personal tax services, directly to directors, senior management.

Rotation

It is the Audit Commission's policy that auditors at an audited body at which a full Code audit is required to be carried out should act for an initial period of five years.

The Commission's view is that generally the range of regulatory safeguards it applies within its audit regime is sufficient to reduce any threats to independence that may otherwise arise at the end of this period to an acceptable level.

Therefore, to safeguard audit quality, and in accordance with APB Ethical Standard 3, it will subsequently approve auditors for an additional period of up to no more than two years, provided that there are no considerations that compromise, or could be perceived to compromise, the auditor's independence or objectivity.

Our team has followed the Commission's guidance fully.

Gifts and hospitality

We have not identified any significant gifts or hospitality provided to, or received from, a member of Committee's Cabinet, senior management or staff.

Conclusion

We hereby confirm that in our professional judgement, as at the date of this document:

- we comply with UK regulatory and professional requirements, including the Ethical Standards issued by the Auditing Practices Board; and
- our objectivity is not compromised.

We would ask the Management Committee to consider the matters in this document and to confirm that they agree with our conclusion on our independence and objectivity.

Annual Governance Statement

Local Authorities are required to produce an Annual Governance Statement (AGS), which is consistent with guidance issued by CIPFA / SOLACE: "Delivering Good Governance in Local Government".

We reviewed the AGS to consider whether it complied with the CIPFA / SOLACE "Delivering Good Governance in Local Government" framework and whether it is misleading or inconsistent with other information known to us from our audit work. We found no areas of concern to report in this context.

N S We anticipate issuing an unqualified value for money conclusion.

Economy, efficiency and effectiveness

Our responsibilities as the Committee's appointed auditors require us to carry out sufficient and relevant work in order to conclude on whether you have put in place proper arrangements to secure economy, efficiency and effectiveness in the use of resources.

Based on the guidance issued by the Audit Commission, our work to support our Value for Money conclusion comprised the following elements:

- reviewing the annual governance statement, and;
- reviewing the results of the work of other relevant regulatory bodies or inspectorates.

Based on the work we have undertaken, we anticipate issuing an unqualified value for money conclusion.

You recognized several areas for improvement in the prior year and have reported good progress against these during 2012/13.

Key areas for improvement going forward include;

- Risk Management Improve risk management awareness throughout the organisation and continue to embed risk management at operational level.
- Anti-Fraud and Corruption refresh and align your anti-fraud policies to national guidance and improve fraud awareness throughout the organization.
- Internal Communication improve staff awareness of key policies, including the Code of Conduct, Customer Care Standards, Whistleblowing and Anti-Fraud.

These areas form part of your plan for improving corporate governance throughout the organization and we are satisfied that you have proposals to achieve these improvements. We identified no significant deficiencies in internal control to report to you.

Internal controls

Accounting systems and systems of internal control

Management are responsible for developing and implementing systems of internal financial control and to put in place proper arrangements to monitor their adequacy and effectiveness in practice. As auditors, we review these arrangements for the purposes of our audit of the Statement of Accounts and our review of the annual governance statement.

Reporting requirements

We have to report to you any significant deficiencies in internal control that we found during the audit which we believe should be brought to your attention.

We identified no significant deficiencies as part of our audit work.

We ask that the Management Committee, as those charged with governance, confirm to us that there are no additional matters relating to fraud that should be brought to our attention.

As part of work to address the risk of fraud, we use data auditing techniques to select journal entries which we believe have a greater risk of containing fraud or error.

We identified no issues to report to you as part of this work.

Risk of fraud

As part of our work on fraud, we enquire with management as to whether there have been any actual, suspected or alleged frauds affecting the Committee which as auditors we should be made aware of. To date we have not identified any material instances of fraud that would impact on our audit opinion. If this status changes between the date of this report and the signing of our audit opinion, we will be required to consider the impact on our audit opinion.

In presenting this report, we seek the Management Committee's confirmation that there have been no matters of which you are aware that have arisen in relation to the risk or incidence of fraud that should be brought to our attention. A specific confirmation from the Committee in relation to fraud will be included in the letter of representation.

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Our audit fees are in line with our original proposal.

Fees update

Fees update for 2012/13

We reported our fee proposals in our plan.

Our forecast outturn is in line with our original proposals.

	2012/13 outturn	2012/13 fee proposal
Statement of Accounts (including Value for Money conclusion)	14,202	14,202
TOTAL	14,202	14,202

We have not undertaken any non-audit work during the year.

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Appendices

There are a number of matters on which we are required to ask for a written representation.

A draft letter of representation is included in this appendix.

Appendix 1: Letter of representation

[Insert ESPO letterhead]

PricewaterhouseCoopers LLP Cornwall Court 19 Cornwall Street Birmingham B3 2DT

Your Ref: ESPO RB 2012/13

Dear Sirs

Representation letter – audit of Eastern Shires Purchasing Organisation's (the Committee) Statement of Accounts for the year ended 31 March 2013

This representation letter is provided in connection with your audit of the Statement of Accounts of Eastern Shires Purchasing Organisation for the year ended 31 March 2013 for the purpose of expressing an opinion as to whether the Statement of Accounts gives a true and fair view, and has been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2012/13 and the Service Reporting Code of Practice 2012/13.

My responsibilities as Treasurer for preparing the financial statements are set out in the Statement of Responsibilities for the Statement of Accounts. I am also responsible for the administration of the financial affairs of the Committee. I also acknowledge that I am responsible for making accurate representations to you.

I confirm that the following representations are made on the basis of enquiries of other chief officers and members of Eastern Shires Purchasing Organisation with relevant knowledge and experience and, where appropriate, of inspection of supporting documentation sufficient to satisfy myself that I can properly make each of the following representations to you.

I confirm, to the best of my knowledge and belief, and having made the appropriate enquiries, the following representations:

Financial Statements

I have fulfilled my responsibilities, for the preparation of the Statement of Accounts in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2012/13; in particular the financial statements give a true and fair view in accordance therewith.

All transactions have been recorded in the accounting records and are reflected in the financial statements.

Significant assumptions used by Eastern Shires Purchasing Organisation in making accounting estimates, including those surrounding measurement at fair value, are reasonable.

I confirm that the accounting for gas accruals and rebates is appropriate and does not result in a material misstatement of the financial statements.

All events subsequent to the date of the financial statements for which the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2012/13 requires adjustment or disclosure have been adjusted or disclosed.

I confirm that the following representations are made on the basis of enquiries of other chief officers and members of Eastern Shires Purchasing Organisation with relevant knowledge and experience and, where appropriate, of inspection of supporting documentation sufficient to satisfy myself that I can properly make each of the following representations to you.

Information Provided

I have taken all the steps that I ought to have taken in order to make myself aware of any relevant audit information and to establish that you (the Committee's auditors) are aware of that information.

I have provided you with:

- access to all information of which I am aware that is relevant to the preparation of the financial statements such as records, documentation and other matters, including minutes of relevant management and Committee meetings;
- additional information that you have requested from us for the purpose of the audit; and
- unrestricted access to persons within the Committee from whom you determined it necessary to obtain audit evidence.

So far as I am aware, there is no relevant audit information of which you are unaware.

Fraud and non-compliance with laws and regulations

I acknowledge responsibility for the design, implementation and maintenance of internal control to prevent and detect fraud.

I have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.

I have disclosed to you all information in relation to fraud or suspected fraud that we are aware of and that affects the Committee and involves:

- management;
- employees who have significant roles in internal control; or
- others where the fraud could have a material effect on the financial statements.

I have disclosed to you all information in relation to allegations of fraud, or suspected fraud, affecting the Committee's financial statements communicated by employees, former employees, analysts, regulators or others.

I have disclosed to you all known instances of non-compliance or suspected non-compliance with laws and regulations whose effects should be considered when preparing financial statements.

I am not aware of any instances of actual or potential breaches of or non-compliance with laws and regulations which provide a legal framework within which the Committee conducts its business and which are central to the Committee's ability to conduct its business or that could have a material effect on the financial statements.

I am not aware of any irregularities, or allegations of irregularities including fraud, involving members, management or employees who have a significant role in the accounting and internal control systems, or that could have a material effect on the financial statements.

Related party transactions

I confirm that we have disclosed to you the identity of the Committee's related parties and all the related party relationships and transactions of which we are aware.

Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with the requirements of Section 3.9 of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2012/13.

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We confirm that we have identified to you all senior officers, as defined by the Accounts and Audit Regulations 2012, and included their remuneration in the disclosures of senior officer remuneration.

Employee Benefits

I confirm that the Committee has made you aware of all employee benefit schemes in which employees of the organisation participate.

Contractual arrangements/agreements

All contractual arrangements (including side-letters to agreements) entered into by the Committee have been properly reflected in the accounting records or, where material (or potentially material) to the financial statements, have been disclosed to you.

Litigation and claims

I have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements and such matters have been appropriately accounted for and disclosed in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2012/13.

Taxation

I have complied with UK taxation requirements and have brought to account all liabilities for taxation due to the relevant tax authorities whether in respect of any direct tax or any indirect taxes. I am not aware of any non-compliance that would give rise to additional liabilities by way of penalty or interest and I have made full disclosure regarding any Revenue Authority queries or investigations that we are aware of or that are ongoing.

In particular:

- In connection with any tax accounting requirements, I am satisfied that our systems are capable of identifying all material tax liabilities and transactions subject to tax and have maintained all documents and records required to be kept by the relevant tax authorities in accordance with UK law or in accordance with any agreement reached with such authorities.
- I have submitted all returns and made all payments that were required to be made (within the relevant time limits) to the relevant tax authorities including any return requiring us to disclose any tax planning transactions that have been undertaken for the Committee's benefit or any other party's benefit.
- I am not aware of any taxation, penalties or interest that are yet to be assessed relating to either the Committee or any associated company for whose taxation liabilities the Committee may be responsible.

Eastern Shires Purchasing Organisation

Bank accounts

I confirm that we have disclosed all bank accounts to you including those that are maintained in respect of the pension fund.

Going Concern

An assessment has been made of the financial health of the Committee for a period of at least one year from the approval of the financial statements.

Assets and liabilities

All known assets and liabilities including contingent liabilities, as at the 31 March 2013, have been taken into account or referred to in the financial statements.

Details of all financial instruments, including derivatives, entered into during the year have been made available to you. Any such instruments open at the 31 March 2013 have been properly valued and that valuation incorporated into the financial statements.

The value at which assets and liabilities are recorded in the net assets statement is, in the opinion of the Committee, the market value. We are responsible for the reasonableness of any significant assumptions underlying the valuation, including consideration of whether they appropriately reflect our intent and ability to carry out specific courses of action on behalf of the pension fund. Any significant changes in those values since the date of the financial statements have been disclosed to you.

The Committee has no plans or intentions that may materially alter the carrying value and where relevant the fair value measurements or classification of assets and liabilities reflected in the financial statements.

In my opinion, on realisation in the ordinary course of the business the current assets in the balance sheet are expected to produce no less than the net book amounts at which they are stated.

The Committee has no plans or intentions that will result in any excess or obsolete inventory, and no inventory is stated at an amount in excess of net realisable value.

The Committee has satisfactory title to all assets and there are no liens or encumbrances on the Committee's assets, except for those that are disclosed in the financial statements.

I confirm that we have carried out impairment reviews appropriately, including an assessment of when such reviews are required, where they are not mandatory. I confirm that we have used the appropriate assumptions with those reviews.

Using the work of experts

I agree with the findings of our valuation experts in evaluating the value of our non-current assets and have adequately considered the competence and capabilities of the experts in determining the amounts and disclosures used in the preparation of the financial statements and underlying accounting records. The Committee did not give or cause any instructions to be given to experts with respect to the values or amounts derived in an attempt to bias their work, and I am not otherwise aware of any matters that have had an impact on the objectivity of the experts.

As minuted by the Management Committee at its meeting on 26th September 2013

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Treasurer

For and on behalf of Eastern Shires Purchasing Organisation

Date

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In the event that, pursuant to a request which Eastern Shires Purchasing Organisation has received under the Freedom of Information Act 2000, it is required to disclose any information contained in this report, it will notify PwC promptly and consult with PwC prior to disclosing such report. Eastern Shires Purchasing Organisation agrees to pay due regard to any representations which PwC may make in connection with such disclosure and Eastern Shires Purchasing Organisation shall apply any relevant exemptions which may exist under the Act to such report. If, following consultation with PwC, Eastern Shires Purchasing Organisation discloses this report or any part thereof, it shall ensure that any disclaimer which PwC has included or may subsequently wish to include in the information is reproduced in full in any copies disclosed.

This document has been prepared only for Eastern Shires Purchasing Organisation and solely for the purpose and on the terms agreed through our contract with the Audit Commission. We accept no liability (including for negligence) to anyone else in connection with this document, and it may not be provided to anyone else.

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