

THE CITY OF LONDON LAW SOCIETY
COMPANY LAW COMMITTEE

Minutes

for the 321st meeting
at 9:00 a.m. on 24th May 2023

1. **Welcome and apologies**

In attendance: John Adebiyi; Sam Bagot; Edward Baker; Adam Bogdanor; Richard Burrows; Lucy Fergusson; Chrissy Findlay; Chris Horton; Vanessa Knapp; Stephen Mathews; Juliet McKean (Secretary); John Papanichola; James Parkes; Chris Pearson (alternate for Jon Perry); David Pudge (Chair); Caroline Rae; Richard Spedding; Allan Taylor; Liz Wall; Simon Wood; and Victoria Younghusband.

Apologies: Mark Austin; Tom Brassington; Kevin Hart; Nicholas Holmes; Jon Perry; Lucy Reeve; and Matthew Rous.

The Chair welcomed Richard Burrows of Macfarlanes and James Parkes of CMS Cameron McKenna Nabarro Olswang as new members of the Committee. The Chair also welcomed Simon Wood of Addleshaw Goddard to his first meeting of the Committee.

2. **Approval of minutes**

The Committee noted that a draft version of the minutes of the meeting held on 29 March 2023 was circulated to members on 18 May 2023.

3. **Matters arising**

3.1 *FRC consultation on UK Corporate Governance Code.* The Chair reported that the FRC had launched this morning a public consultation on proposed revisions to the UK Corporate Governance Code. The Chair asked members of the Committee to let the Secretary know whether they would be willing to assist with responding to this consultation. It was noted that the closing date is 13 September 2023.

3.2 *DBT call for evidence on non-financial reporting.* The Chair reported that the Department for Business and Trade (**DBT**) had launched this morning a call for evidence on the non-financial reporting requirements that UK companies need to comply with to produce their annual report. The Chair noted that this call for evidence builds on the Government's policy paper on "Smarter regulation to grow the economy" (see minute 3.3) which sets out how the Government would improve regulation to reduce burdens post-Brexit. The Chair noted that members of the Committee should encourage clients to respond to this call for evidence but also asked members of the Committee to let the Secretary know whether they would be willing to assist with preparing a response on behalf of the Committee. It was noted that the closing date is 16 August 2023.

- 3.3 *REUL Bill*. The Chair reported that on 15 May 2023 the Government published a schedule of retained EU law that will be revoked or sunset by 31 December 2023, which followed a Written Statement of Kemi Badenoch MP issued on 10 May 2023 on Government amendments to the Retained EU Law (Revocation and Reform) Bill (**REUL Bill**). It was noted that such amendments included an amendment to replace the sunset provision in the REUL Bill (pursuant to which all EU-derived subordinate legislation and retained direct EU legislation would be revoked, unless preserved) with a list of the retained EU laws that the Government intends to revoke under the REUL Bill at the end of 2023.

The Chair also reported that the Written Statement highlights that the Government will make improvements to employment law, including by simplifying TUPE transfers and limiting non-compete clauses in employment contracts. The Chair noted that in this regard DBT published on 12 May 2023 a consultation on retained EU employment law reforms, which includes proposals to change the consultation requirements in the TUPE regulations in order to simplify the transfer process whilst ensuring that workers' rights continue to be protected. The Chair further noted that the Written Statement also announces the publication of a policy paper entitled "Smarter regulation to grow the economy", which is the first in a series of regulatory reform announcements focusing on how the Government can improve regulation across the UK economy to reduce burdens, push down the cost of living and drive economic growth.

- 3.4 *NSI Act Market Guidance April 2023*. The Chair reported that on 27 April 2023 the Cabinet Office announced the publication of the April 2023 edition of NSI Act Market Guidance and that the topics in this edition are based on analysis of the notifications received since the commencement of the NSI Act regime and questions and feedback that have been raised with the Investment Security Unit.
- 3.5 *ROE register*. The Chair reported that on 27 April 2023 the draft Register of Overseas Entities (Penalties and Northern Ireland Dispositions) Regulations 2023 were published, along with a draft explanatory memorandum, which implement certain aspects of the Register of Overseas Entities regime by conferring power on the Registrar to impose a financial penalty on a person if satisfied, beyond reasonable doubt, that the person has engaged in conduct amounting to an offence under Part 1 of the Economic Crime (Transparency and Enforcement) Act 2022. It was noted that these regulations are drafted to come into force on 21 June 2023. The Chair also reported that on 16 May 2023 the Register of Overseas Entities (Definition of Foreign Limited Partner, Protection and Rectification) Regulations 2023 were made and published together with an explanatory memorandum. It was noted that these regulations come into force on 1 June 2023 and are in substantially the same form as the draft version published on 15 March 2023.
- 3.6 *ECCT Bill - New corporate offence for failure to prevent fraud*. The Chair reported that on 11 April 2023 the Home Office announced that it had tabled an amendment to the Economic Crime and Corporate Transparency Bill (**ECCT Bill**) to create a new corporate criminal offence for failure to prevent fraud. The Chair noted that under the new offence, a large organisation will be liable where a specified fraud offence is committed by an employee, agent or subsidiary, for the organisation's benefit (or those to whom services are provided), and the organisation did not have reasonable fraud prevention procedures in place. The Chair also noted that once the ECCT Bill has received Royal Assent, the Government will need to publish guidance on reasonable

fraud prevention procedures and the offence will only come into force once the guidance has been published. It was noted that a new Government factsheet on this new offence has been added to the Government's series of factsheets on aspects of the ECCT Bill and an amended version of the ECCT Bill published on 11 May 2023 contains this new offence.

- 3.7 *ECCT Bill - Changes to registers of members.* The Chair reported that a joint working group of the Law Society and CLLS Company Law Committees submitted a paper to DBT on the tabled amendments to the ECCT Bill which include a proposed new clause to be inserted after clause 46 (amending section 113 of the Companies Act 2006 (**CA 2006**) and inserting new sections 113A to 113I CA 2006) which, amongst other things, would require companies to include old information in respect of members and former members on the register of members and impose criminal sanctions on members of companies who fail to inform the company of their details (name/address) or that their details (name/address) have changed within two months of becoming a member or the change occurring. The Chair noted that the amended version of the ECCT Bill (see minute 3.6) contains the new provisions relating to the register of members.
- 3.8 *BEIS consultation on the duty to report on payment practices and performance.* The Chair reported that on 28 April 2023 the Committee submitted a response to the consultation paper on proposals to amend the Reporting on Payment Practices and Performance Regulations 2017 and the Limited Liability Partnerships (Reporting on Payment Practices and Performance) Regulations 2017.
- 3.9 *Audit and Corporate Governance Reform – PIE definition.* The Chair reported that a working group of the Committee had provided comments to DBT on the Government's thinking on how the commitment to extend the definition of "public interest entity" (for audit purposes) to cover very large private companies and LLPs should be implemented.
- 3.10 *FRC consultation on audit committees minimum standard.* The Chair reported that on 22 May 2023 the FRC announced the publication of the new minimum standard for audit committees, which has been titled "Audit Committees and the External Audit: Minimum Standard".

4. **Discussions**

- 4.1 *Proposed equity listing rule reforms.* The Chair reported that on 3 May 2023 the FCA announced the publication of CP23/10 - Primary Markets Effectiveness Review: Feedback to DP22/2 and proposed equity listing rule reforms. The Chair reported that the FCA is proposing to reform and streamline the listing rules in the UK to help attract a wider range of companies, encourage competition and improve choice for investors, including by creating a single listing category for shares in commercial companies and reducing the eligibility criteria for companies seeking to IPO on the Official List. It was noted that the consultation closes on 28 June 2023 and, as a follow-up to the preliminary proposals set out in CP23/10, the FCA is aiming to issue a further consultation on the wider proposed changes to its Listing Regime in autumn 2023, which will include draft rules. It was also noted that on 3 May 2023 the FRC issued a press release welcoming the publication of CP23/10. The Chair reported that the Joint Prospectus and Listing Rules Working Group has organised a call to discuss CP23/10

on 25 May and that there will be an FCA/CLLS CLC Liaison Committee meeting on 7 June primarily to discuss CP23/10.

The Committee further noted that the Capital Markets Industry Taskforce (**CMIT**) has announced that it has commissioned the production of a report on 'UK Capital Markets of Tomorrow', which will be published in the autumn, and that a CMIT conference, with invited UK and international stakeholders from across the market, will take place on 7 July 2023 to help inform the work.

- 4.2 *Secondary Capital Raising Review – Implementation of CA 2006 changes.* The Chair reported that the Committee had been given an opportunity to comment on questions that DBT has on the implementation of certain changes to the CA 2006 that arise from recommendations to the Government included in the Secondary Capital Raising Review.
- 4.3 *Reforms to the prospectus regime.* The Chair reported that the Joint Prospectus and Listing Rules Working Group had given comments to HMT on the illustrative statutory instrument (The Financial Services and Markets Act 2000 (Public Offers and Admissions to Trading) Regulations 2023) and HMT's revised drafting of the exemption in respect of offers to existing holders of equity securities and that the Joint CLLS/Law Society Takeovers Working Group had given comments to HMT on the exemption in respect of offers in connection with takeovers. The Committee noted that on 5 May 2023 the FCA launched a new webpage on the new regime for public offers and admissions to trading, which highlights that the FCA is launching a process of engagement and dialogue with stakeholders on key issues that the FCA is considering in respect of these reforms.
- 4.4 *PCP 2023/1.* The Chair reported that on 15 May 2023 the Code Committee of the Takeover Panel published Panel Statement 2023/7 which announces the publication of PCP 2023/1, which sets out proposed amendments to the Takeover Code in relation to Rule 21 (Restrictions on frustrating action) and other matters. The Chair noted that the consultation closes on 21 July 2023 and that the Joint CLLS/Law Society Takeovers Working Group will be preparing a response to this consultation and organising a working group call.
- 4.5 *HMRC consultation on modernising stamp taxes on shares.* The Chair reported that on 27 April 2023 HMRC published a consultation on proposals to modernise the stamp taxes on shares framework, which encompasses both stamp duty and stamp duty reserve tax. The Chair noted that the consultation closes on 22 June 2023 and that it is proposed that the Committee and the CLLS Revenue Committee will submit a joint response to this consultation. The Chair asked members of the Committee to let the Secretary know whether they would be willing to assist with responding to this consultation.

5. **Recent developments**

The Chair commented on the cases in section 5.9. The Committee noted the following additional items in sections 5.1 to 5.8 which time did not allow them to consider in the meeting, other than the Committee discussed items 5.1(b) and 5.2(b).

5.1 Company law

- (a) *Companies House Direct and WebCheck services to close.* On 30 March 2023, Companies House announced that its Companies House Direct and WebCheck services will close on 30 November 2023.
- (b) *European Commission proposal for an amending directive on the use of digital tools and processes.* On 29 March 2023, the European Commission announced the publication of a proposal for a directive amending Directives 2009/102/EC and (EU) 2017/1132 as regards further expanding and upgrading the use of digital tools and processes in company law. The proposal aims to improve transparency and trust in the business environment in the single market (by making more information about companies publicly available and by ensuring that company information in business registers is reliable and up-to-date) and to reduce administrative burden when companies use company information from business registers in cross-border situations. An Annex to the proposal and a Q&A have also been published.

5.2 Corporate governance

- (a) *CGI paper on tackling greenwashing from a governance perspective.* On 3 May 2023, the Chartered Governance Institute UK & Ireland (**CGI**) announced the publication of a thought leadership paper on tackling greenwashing from a governance perspective. The paper frames greenwashing as a governance issue and provides the necessary framework for governance professionals to build 'greenwash-proof' organisations.
- (b) *ICGN Statement on Post Covid AGM Practices and Shareholder Rights.* On 19 April 2023, the International Corporate Governance Network (**ICGN**) published a statement on post-Covid AGM practices and shareholder rights. ICGN states that a hybrid format is the optimal AGM format allowing for the in-person presence of shareholders whilst also accommodating access to the meeting via electronic or virtual means. ICGN also calls on regulators around the world to discourage the practice of companies adopting virtual-only AGMs and require that companies provide for hybrid AGMs to allow global investors to have the option of virtual or live participation. In contrast, the Share Your Voice campaign published an open letter to the Secretary of State for DBT (co-signed by Archie Norman (Chairman, Marks and Spencer Group plc), James Ashton (CEO, Quoted Companies Alliance), Charles Henderson (Chairman, UK Shareholders' Association), Mark Northway (Director, ShareSoc) and Thera Prins (CEO Shareholder Services Equiniti)) launching a petition calling upon the Government to (amongst other things) recognise the validity of fully digital AGMs and GMs without the need for companies to change their articles by removing the requirements in legislation to state the "place" of the meeting and for there to be two qualifying persons to be present for the meeting to be quorate.
- (c) *New FRC webpage to boost Investor-Audit Committee engagement.* On 19 April 2023, the FRC announced the launch of a new webpage providing conversation starters aimed at promoting better engagement between investors and audit committees to facilitate better understanding of companies and their

approach to financial reporting and internal control. The conversation starters are structured by topic and include an initial broad question with several more detailed follow-up questions. The first in a series of conversation starters is on assurance-related topics. Future areas of focus may include further ESG-related considerations, approach to materiality, contextualising risk and business model and use of emerging technology.

- (d) *PLSA Stewardship and Voting Guidelines 2023*. On 30 March 2023, the PLSA announced the publication of its 2023 stewardship and voting guidelines. The press release states that three themes that have emerged as having particular relevance for 2023 are the cost-of-living crisis, climate change and the impact of company operations on its workforce and wider society.
- (e) *FRC Lab insight: AI, emerging tech and governance*. On 23 March 2023, the FRC Lab published their insights on the impacts and considerations of AI and Emerging Tech on governance and related issues.

5.3 Reporting and disclosure

- (a) *Updated Green Finance Strategy*. On 30 March 2023, the Government published its 2023 Green Finance Strategy, which is an update to its 2019 Green Finance Strategy. The updated strategy indicates, amongst other things, that there will be a consultation in Q4 2023 on the introduction of requirements for the UK's largest companies to disclose their net zero transition plans, the Government will assess the suitability for the UK of the global sustainability disclosure standards being prepared by the International Sustainability Standards Board (final standards are expected to be published in summer 2023) and there will be a call for evidence in Q3 2023 on reporting scope 3 greenhouse gas (GHG) emissions. In a joint statement made on 30 March 2023, the FCA, the FRC, the Bank of England and The Pensions Regulator have welcomed the Government's updated Green Finance Strategy (see also the FRC press release).
- (b) *FRC 3-Year Plan for 2023 – 2026*. On 27 March 2023, the FRC announced the publication of its 3-Year Plan: 2023 – 2026, which outlines its priorities and objectives for the period 2023-2026. The press release states that the FRC anticipates an increase of £6.5m in its overall costs for 2023-24, which reflects a delay in the creation of ARGAs, and has re-prioritised its work to focus on changes that can be made using its existing powers and remit and, where appropriate, planning for the creation of new ARGAs powers and functions.

5.4 Equity capital markets

- (a) *Improving equity secondary markets*. On 3 May 2023, the FCA announced the publication of Policy Statement 23/4: Improving equity secondary markets, which summarises feedback the FCA has received on proposals in Consultation Paper 22/12 and sets out changes to the relevant technical standards – see also the policy statement landing page. The changes are part of the Wholesale Markets Review. PS 23/4 also sets out the direction of the FCA's work on improving the resilience of UK trading venues to outages and the way retail orders are executed in the UK.

- (b) *Pre-Emption Group Terms of Reference.* On 26 April 2023, the FRC published the Pre-Emption Group Terms of Reference. This follows a recommendation made by the Secondary Capital Raising Review that PEG's role should be put on a more formal and transparent footing than it is currently, including by adopting revised terms of reference.

5.5 **MAR**

- (a) *Draft insider dealing order supplementing the CJA 1993.* On 17 April 2023, the draft Insider Dealing (Securities and Regulated Markets) Order 2023 was published, along with an explanatory memorandum. The draft instrument updates Schedule 2 of the Criminal Justice Act 1993 (**CJA 1993**) to broadly align the securities and markets on which the criminal offence of insider dealing can be committed under Part 5 of the CJA 1993 with those to which UK MAR applies. The order will enter into force 21 days after the day on which it is made.
- (b) *HM Treasury and FCA joint statement on the review of the Criminal Market Abuse Regime.* On 24 March 2023, HM Treasury and the FCA announced that they have completed the review of the UK criminal market abuse regime, which has identified a number of areas where the Government believes it would be appropriate to update the criminal regime. The statement states that the Government will consider changes to the criminal regime alongside any reforms to UK MAR through the Future Regulatory Framework Review and will therefore consider how to take forward the recommendations from the criminal market abuse regime review at that point.

5.6 **Auditing and accounting**

- (a) *Updated FRC approach to audit supervision.* On 31 March 2023, the FRC published an updated version of its approach to audit supervision, which includes updates that reflect the FRC's assumption of responsibility for PIE audit firms and auditor registration from 5 December 2022. The FRC states that it will update the document again when it transitions to ARGAs to reflect its new supervisory responsibilities and powers.
- (b) *Consultation on exposure draft of IIA Global Internal Audit Standards.* On 1 March 2023, a letter from the Chairman of the International Internal Audit Standards Board (**IIASB**) of the Institute of Internal Auditors (**IIA**) was published that announces the publication of an exposure draft of the Global Internal Audit Standards (previously known as the International Standards for the Professional Practice of Internal Auditing) which form part of the International Professional Practices Framework.

5.7 **Takeovers**

- (a) *Panel Statement 2023/5.* On 4 April 2023, the Takeover Panel published Panel Statement 2023/5 which announces the publication by the Code Committee of:
 - (i) Response Statement 2022/3, which sets out amendments to the Takeover Code following the consultation on the offer timetable in competitive bid situations, along with Instrument 2023/1 which makes the amendments to the

Code adopted in RS 2022/3; and (ii) Response Statement 2022/4, which sets out amendments to the Takeover Code following the consultation on miscellaneous amendments to the Takeover Code, along with Instrument 2023/2 which makes the amendments to the Code adopted in RS 2022/4. The amendments to the Code made by Instrument 2023/1 and Instrument 2023/2 take effect on 22 May 2023.

5.8 Miscellaneous

- (a) *Call for proposals on Financial Services Regulation: Measuring Success.* On 9 May 2023, HM Treasury announced a call for proposals that seeks views on what additional metrics it would be most appropriate for the FCA and PRA to publish in order to ensure that reporting on the new secondary objectives to facilitate the international competitiveness of the UK economy and its growth in the medium to long term (being introduced by the Financial Services and Markets Bill) is sufficient to support scrutiny of the regulators' work in embedding and advancing these new objectives. The call for proposals closes on 4 July 2023.
- (b) *HMRC consultation on tougher consequences for promoters of tax avoidance.* On 27 April 2023, HMRC published a consultation on proposals to introduce a new criminal offence for promoters of tax avoidance who fail to comply with an HMRC notice to stop promoting a tax avoidance scheme and proposals to expedite the disqualification of directors of companies who are involved in the promotion of tax avoidance, including those who control or exercise influence over a company. The consultation closes on 22 June 2023.
- (c) *Digital Markets, Competition and Consumers Bill.* On 25 April 2023, the Digital Markets, Competition and Consumers Bill was introduced to Parliament (see also the Government press release and Explanatory Notes). The Bill provides for a new digital markets regime regulated by the Competition and Markets Authority (CMA) and proposes a range of reforms to UK competition and consumer law. The policy summary briefing on the competition reform states that the Bill will limit the CMA's review of mergers by increasing the turnover-based threshold for the target of a merger from £70 million to £100 million and by introducing a new small merger safe harbour which will provide small and micro enterprises with the certainty that mergers between them will not be examined.
- (d) *Law Society Guidance on the Impact of Climate Change on Solicitors.* On 19 April 2023, the Law Society published its guidance on the impact of climate change on solicitors. The CLLS provided feedback to assist the Law Society in drafting this guidance.
- (e) *Wolfsberg Anti-Bribery and Corruption Compliance Programme Guidance.* On 17 April 2023, the Wolfsberg Group published an updated version of its Anti-Bribery and Corruption Compliance Programme Guidance, along with an Executive Summary. The guidance is focused on the financial services industry and addresses how to develop, implement and maintain an effective anti-bribery and corruption compliance programme.

- (f) *HM Treasury call for evidence for the Investment Research Review.* On 3 April 2023, HM Treasury published a call for evidence for the Investment Research Review. The review has been set up to examine the link between levels of research and the attractiveness of the UK as a destination for companies to access capital, both in private and public markets.
- (g) *FRC Technology & Digital Hub.* On 3 April 2023, the FRC launched its Technology & Digital Hub, which provides an overview of its work in this area, including how that work fits into the FRC's wider strategy and links to FRC publications that focus on its technology and digital priorities.
- (h) *Consultation on ESG ratings providers.* On 30 March 2023, HM Treasury published a consultation on whether regulation for providers of ESG ratings should be introduced and on the potential scope of a regulatory regime. The consultation closes on 30 June 2023.
- (i) *Updated LSAG AML guidance for the legal sector.* On 28 March 2023, the Law Society published a revised version of the Legal Sector Affinity Group's AML guidance for the legal sector, which has been updated to reflect changes to the duty to report discrepancies in beneficial ownership information and a new duty to report discrepancies on the Register of Overseas Entities which came into force on 1 April 2023. In addition, on 1 April 2023, Companies House updated its guidance on reporting a discrepancy about a PSC or a registrable beneficial owner to bring it into line with these changes for reporting material discrepancies.
- (j) *Draft Financial Services and Markets Act 2000 (Financial Promotion) (Amendment) Order 2023.* On 27 March 2023, a draft version of the Financial Services and Markets Act 2000 (Financial Promotion) (Amendment) Order 2023 was published, together with a draft explanatory memorandum. The Order, and relevant FCA rules, will provide for the regulation of in-scope cryptoasset financial promotions. The Order provides for a four-month implementation period after it is made.

5.9 Cases

- (a) *(1) Decision Inc Holdings Proprietary Ltd (2) Decision Inc Shareco (RF) Proprietary Limited v (1) Stephen Garbett (2) Anis El Mariesh [2023] EWHC 588 (Ch).* The High Court held that the sellers of a company had breached a warranty that there had been no "material adverse change" (not defined) in the prospects of the target company since its last accounts date. The judge remarked that the general test for determining whether an adverse change is material is an objective one, namely "whether a reasonable person who had entered into the transaction with the aims and objectives of the buyer would have sought to withdraw from or renegotiate the transaction had he known of the change". He further observed that in the particular context of a contractual term of this kind (i.e. the alleged breach of warranty), "we know who the parties are, and can divine their interests by evidence" and held that the test of materiality is "if, had [the breach] been known to the other party in advance, the other party would either have declined to proceed with the transaction at all, or agreed to proceed only after a renegotiation of the financial terms". On the meaning of

"prospects", the judge concluded that it is necessary to interpret the term in the context of the transaction, finding from the evidence that "if anyone had asked [the buyer] what it considered the "prospects" of the Company to be at any point prior to completion...the resulting discussion would have been conducted entirely in terms of expected levels of EBITDA". Therefore to establish whether there had been a breach of warranty in this case, the court had to determine a 'baseline' figure i.e., the expected or forecast level of EBITDA at the time of the contract and the 'actual' figure i.e., the actual position as at the date of the contract, and then consider whether the difference between the two was so great as to be 'material', applying the test above.

- (b) *ClientEarth's (CE) derivative action against the directors of Shell plc (Shell)*. In February 2023, CE filed a derivative claim against Shell's directors for failing to prepare for climate risks facing Shell. CE alleged that Shell's directors breached their duties under the CA 2006, including the duty to promote the success of the company under section 172 CA 2006, and the duty to exercise reasonable care, skill and diligence under section 174 CA 2006. The High Court concluded that CE failed to make a *prima facie* case under section 261(1) CA 2006 to enable the grant of permission and did not consider that the claim would be continued by a person bound to promote the success of the company.

In relation to the scope of the duties owed under section 172, the Court held it is for the directors to decide how Shell's business should be conducted and how best to promote the success of the company. Similarly, under section 174, the Court held that the law does not specify what is reasonable in every scenario.

As to whether the duties were breached, on a *prima facie* basis, the Court held that the evidence submitted by CE did not demonstrate that there is a universal method for achieving the targets set by Shell's directors. Therefore, the evidence did not demonstrate that the directors failed to manage the business in the best interests of Shell's members.

It was noted that an oral hearing has been granted to reconsider the dismissal of the claim.

6. Any other business

- 6.1 *CLLS Land Law Committee Certificate of Title*. The Chair noted that on 9 May 2023 the CLLS Land Law Committee issued the Eighth Edition of its Certificate of Title.
- 6.2 *CLLS/CLSC Summer Reception and AGMs*. The Chair noted that the CLLS/CLSC Summer Reception is being held at 6.30 pm on 21 June at Pewterer's Hall, Oat Lane, London EC2V 7DE and that the AGMs of both organisations will be held prior to the reception (the CLLS at 5.00 pm and the CLSC at 5.30 pm). The Chair commented that all members of the Committee are welcome to attend.

13 July 2023