



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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February 2014

You asked for the Committee's advice about taking up a part-time, paid appointment as Non-Executive Chairman of Pathfinder Minerals Ltd.

In their consideration of this application, the Committee took into account that you met Pathfinder Minerals on one occasion whilst you were in office; and subsequently wrote to the Government of Mozambique supporting the company in an ongoing legal dispute it is involved in that country. The Committee noted that this activity was in the normal course of your ministerial duties. The Committee took into account that you had no official dealings with any competitors of your prospective employer whilst in Government. The Committee noted that you are not aware of any relationship (contractual or otherwise) between your prospective employer and your former Department. The Committee also noted that it is over a year since you left office.

Taking all of these factors into consideration, our advice is that you can take up the appointment forthwith, subject to the following conditions:

- you should not draw on any privileged information available to you from your time in Government; and
- you should not become personally involved in lobbying the UK Government on behalf of your new employer or its clients for two years from your last day in office.

It might be helpful if I add that lobbying is defined in the Business Appointment Rules in the following way: "Lobbying in this context means that the former Minister should not engage in communication with Government - including Ministers, special advisers and officials - with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted".

I should be grateful if you would inform us as soon as you take up the appointment or, if earlier, when it is announced that you will do so, either by returning the enclosed form or by emailing this office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced. This could lead to a false assumption being made about whether you had complied with the Ministerial Code. Similarly, I should be grateful if you would inform us if you propose to extend or otherwise change your role with Pathfinder Minerals Ltd as, depending on the circumstances, it may be necessary for you to seek fresh advice.

Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website and include the main details of the application, together with the Advisory Committee's advice, in the regularly updated consolidated list on our website and in the next annual report.

Lord Lang of Monkton

Henry Bellingham Esq MP