

From the Chair



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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1. You approached the Committee about taking up an appointment as an Advisor at C3.ai.

The Committee's role and remit

2. It is the Committee's role to advise on the conditions that should apply to appointments or employment under the Government's Business Appointments Rules for Former Ministers (the Rules), which apply to former Ministers for two years after they leave office. The Rules seek to counter suspicion that:
  - a) the decisions and statements of a serving Minister might be influenced by the hope or expectation of future employment with a particular firm or organisation; or
  - b) an employer could make improper use of official information to which a former Minister has had access; or
  - c) there may be cause for concern about the appointment in some other particular respect.
3. When the Committee considers applications, it must have in mind that Government has judged that it is in the public interest that former Ministers with experience in Government should be able to move into business or into other areas of public life, and to be able to start a new career or resume a former one. It is equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.
4. It is not the Committee's role to pass judgment on whether an appointment is appropriate or suitable in any other regard.

Appointment Details

5. You seek to take up appointments with C3.ai as an advisor and a member of the advisory board. You said C3.ai is a U.S based enterprise artificial intelligence (AI) software provider. The website states C3.ai is a '*...leading enterprise AI software provider for accelerating digital transformation*'. It provides comprehensive services to build enterprise-scale AI applications. The C3 provides AI applications for predictive maintenance, fraud detection, sensor network health, supply network optimization, energy management, anti-money laundering, and customer engagement. It has

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customers in a number of sectors including, retail, healthcare, defence, oil & gas and banking.

6. You told the Committee as an advisor you will be on the advisory board. You said you will speak at client events and host dinners for clients and company staff. Also you told the Committee you will advise on:
  - general strategy
  - EMEA (Europe, the Middle East and Africa) market opportunitiesIn this role you said you will have no contact with government in any way.
7. You informed the Committee you had no official dealings with C3.ai during your last two years in office. You did inform the Committee the only relevant meeting with a competitor was a meeting with a company called Palantir Technologies. You said you had one general meeting in January 2020 and it was a get-to-know you meeting with no follow up.
8. The Permanent Secretary at HM Treasury (HMT) was consulted and confirmed to the Committee: HMT has no relationship with C3.ai and you had no official dealings with C3.ai. With regard to your meeting with Palantir Technologies HMT said you '*dropped into the Palantir pavilion*', for a short meeting with Alex Karp. HMT said in this meeting Alex Karp set out Palantir's engagement with US/UK governments, and support through its technology for a range of government bodies. You thanked Alex Karp for Palantir's leading work on tackling child sexual exploitation, and you and Alex Karp agreed that collaboration with HMG would continue where possible to tackle this injustice. HMT confirmed you do not have access to sensitive information regarding competitors or C3.ai including Palantir Technologies. HMT has no concerns about you taking up this appointment.
9. The Permanent Secretary at Home Office (HO) was also consulted for this application. HO informed the Committee: it has no relationship with C3.ai; you were not involved in awarding funding or contracts to C3.ai; did not meet with competitors of C3.ai nor have access to sensitive information regarding competitors. HO told the Committee you would not have been involved in policy decisions or development directly related or affecting C3.ai. HO said you would have been involved in AI discussions around security but this would not be connected to C3.ai's line of work or competitors. HO further confirmed that C3.ai could not be seen to benefit from any policy decisions you or HO made while you were in office. HO also informed the Committee you do not have access to sensitive information that could benefit C3.ai due to time lapses any policy would have been announced. HO has no concerns about you taking up this appointment.

### The Committee's consideration

10. When considering this application, the Committee<sup>1</sup> took into account this appointment has no connection with your ministerial role as Chancellor. It particularly noted you had no dealings with C3.ai whilst in office. While you were involved in discussions around AI, HO confirmed you did not make any policy decisions that affected C3.ai. Therefore, the Committee considered there is no objective reason it might be perceived this appointment is a reward for decisions made or actions taken from your time in office.
11. The Committee did not consider this appointment raises any propriety concerns under the Government's Business Appointment Rules, however it would like to draw your

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<sup>1</sup> This application for advice was considered by Sir Alex Allan; Jonathan Baume; Dr Susan Liataud ; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; Lord Larry Whitty and John Wood.

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attention to the conditions below. In particular, the restriction that you should not draw on privileged information available to you from your time in office. The Committee noted that during your time at HO you were involved in discussions around AI. However, the Committee put weight behind the HO's comments that these discussions would not be connected to C3.ai's line of work and that you do not have access to sensitive information that could benefit C3.ai due to the passage of time. The Committee also recognised that as Chancellor you had responsibility for planning for the impact of leaving the EU without a trade deal. Any company or organisation operating in the UK could be seen to benefit from this insight. However, the Committee recognised the opportunity for you to offer an advantage is limited, given the significant changes in the economic landscape; and that you are prevented from drawing on such information and/or advising on said matters by the conditions below.

12. The Committee further noted that due to your role you will have built up a network of contacts in government and there is a risk it could be perceived these contacts might assist C3.ai unfairly. Therefore, the Committee would draw your attention to the below restrictions that make it clear that any use of your contacts to the unfair advantage of C3.ai would be inappropriate. However, the Committee noted it is not your intention to have contact with government.
13. Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises this appointment with **C3.ai** be subject to the following conditions:
  - that you should not draw on (disclose or use for the benefit of yourself or the organisation to which this advice refers) any privileged information available to you from ministerial office. In the context of this general provision, the Committee considers you should specifically avoid giving C3.ai, or its subsidiaries, partners or clients, privileged insight into the Brexit related issues, insofar as it as it pertains to the negotiating position of the UK Government and other parties to the negotiations prior to the date upon which you left ministerial office, whether generally or regarding fiscal matters;
  - for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK Government on behalf of C3.ai (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the Government and/or Ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage C3.ai (including parent companies, subsidiaries, partners and clients); and
  - for two years from your last day in office you should not advise C3.ai or its partners or clients on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of the UK Government.
14. By 'privileged information' we mean official information to which a Minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.
15. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/Minister "*should not engage in communication with Government (Ministers, civil servants, including special advisers, and other relevant officials/public office holders) – wherever it takes place - with a view to influencing a Government decision, policy or contract award/grant in relation to their own interests*

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*or the interests of the organisation by which they are employed, or to whom they are contracted or with which they hold office."*

16. I should be grateful if you would inform us as soon as you take up this role, or if it is announced that you will do so. We shall otherwise not be able to deal with any enquiries since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether you had complied with the Rules and the Ministerial Code.
17. Please also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
18. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

The Rt Hon Lord Pickles

The Rt Hon Sajid Javid MP