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BUSINESS APPOINTMENT APPLICATION: Admiral Sir Tim Fraser KCB ADC, former Vice Chief of the Defence Staff at the Ministry of Defence. Paid appointment with Strider Technologies UK Ltd.

1. Admiral Sir Tim sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown Servants (the Rules) on an appointment he wishes to take up as Strategic Advisor for Strider Technologies (Strider).
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during Admiral Sir Tim's time in office, alongside the information and influence the former Vice Chief of the Defence Staff may offer Strider. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Rules¹ set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's consideration of the risk presented

5. The Committee² took into consideration that Strider has begun engagement with the MOD. It is significant that the MOD and Admiral Sir Tim confirmed he had no engagement with the company in office and had no knowledge of this engagement

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

² This application for advice was considered by Jonathan Baum; Andrew Cumpsty; Sarah de Gay; Isabel Doverty; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir and Lord Larry Whitty.

until after he left office and this proposed role was suggested. Sir Tim neither met with nor made any decisions specific to the company. Therefore, the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.

6. As the former Vice Chief of the Defence Staff, Admiral Sir Tim would have had access to a wide range of privileged information regarding defence and security. Given the span of that information and his proximity to decisions at the MOS - he could offer any defence and security focussed company unfair access to information and influence.

7. The Committee agreed with the MOD that there are a number of mitigating factors that help to reduce the risks associated with Admiral Sir Tim's access to information and the unfair insight he may be seen to offer Strider:

- the MOD confirmed he withdrew completely from all defence matters from his last day in the role in May 2022;
- it has been over 10 months since he has had access to information and decisions within government/ and the MOD. This reduces the currency of this information;
- he is prevented from drawing on privileged information and has an ongoing duty of confidentiality; and
- there is nothing specific the MOD is aware of that might offer a significant advantage to Strider, this is therefore a general risk associated with his wide ranging and senior role in defence.

8. Admiral Sir Tim will have gained contacts within the UK and internationally - including within other governments, militaries and private companies, particularly in defence. As such, there is a risk his network and influence might be used to assist Strider unfairly. The Committee notes it is not his intention to have contact with the MOD in this role. There remains a significant risk it will be perceived that Admiral Sir Tim's influence, as a former Vice Chief of the Defence Staff, offers Strider with an unfair advantage in relation to its plans for business expansion.

The Committee's advice

9. The Committee noted the mitigating factors above that help to reduce the risks associated with Admiral Sir Tim's access to information. Given the potential for Strider's work in the UK to overlap with his access to information and responsibilities as Vice Chief of the Defence staff, the Committee has imposed a condition which prevents him from working in the UK defence sector.

10. 10. Due to Admiral Sir Tim's influence in the defence industry and his network outside the UK, the Committee has also advised that he must not make use of this privileged network to secure business for Strider. He has confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules. However, there is a risk he could be seen to be offering Strider unfair access and influence. The Committee's advice is therefore that there should be an appropriate gap between his leaving office and taking up this role – 12 months has now passed since he last had access to information and decision making in office. Which was considered sufficient. Further, he should have no direct engagement with

the MOD on behalf of Strider, as well as conditions that prevent him making use of contacts gained in other governments and organisations to gain business for Strider. These are alongside the standard conditions which prevent him from making use of privileged information add being involved in bids and contracts with the MOD.

11. The Committee advises, under the government's Business Appointment Rules, that Admiral Sir Tim's role with **Strider** should be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time in Crown service;
- for two years from his last day in Crown service, he should not advise on the UK defence market;
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of Strider (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Strider (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service he should not have any contact or engagement on behalf of Strider (including parent companies, subsidiaries, partners and clients) with the MOD;
- for two years from his last day in Crown service, he should not provide advice to Strider (including parent companies, subsidiaries, partners and 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 or any of its arm's length bodies - including the MOD or its trading funds; and
- for two years from his last day in Crown service, he should not become personally involved in lobbying contacts he has developed during his time in office and in foreign governments and organisations (including NATO and its allied nations' governments and/or militaries) for the purpose of securing business/funding or otherwise unfairly advantage Strider (including parent companies, subsidiaries and partners).

12. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. It is an applicant's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

13. 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 Ministerial Code/Civil Service Code or otherwise.

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

15. Admiral Sir Tim must inform us as soon as he takes up this work or if it is announced that he will do so. Similarly, he must inform us if he proposes to extend or otherwise change her role with the organisation as depending on the circumstances, it might be necessary for her to seek fresh advice.

16. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee’s website.

Yours sincerely,

Cat Marshall
Committee Secretariat

Annex - material information

The Role

1. Strider Technologies UK Ltd (Strider) - Strider Technologies US (parent company) - Admiral Sir Tim said that Strider is *‘a US based technology company that develops data driven software tools for enterprises to combat threats beyond the cyber domain, delivering strategic intelligence specifically designed to help organisations visualize, manage, and respond to risks across your organizations’.*

2. Strider’s website says that it is *‘...revolutionizing the way companies, universities, research institutions, and government agencies protect their innovation and compete in a new era of global strategic competition. Our trailblazing technology and intelligence solutions enable clients to proactively identify, manage, and respond to nation-state directed IP theft and supply chain vulnerabilities’.*

3. Strider’s website states it currently offers 3 products:

- a. Risk intelligence - software helps to visualise, manage and respond to economic statecraft risks across organisations
- b. Shield intelligence - enriches internal data systems with thousands of proprietary data points
- c. Supply chain intelligence ensures that supply chains are free of geopolitical and compliance risks

4. Admiral Sir Tim added Strider is in the early stages of developing their UK and EU business, in both the public and private sector.

5. Admiral Sir Tim said he will support developing the company strategy and developing market opportunities in both the public and private sectors with attendance of external meetings (primarily in the UK and Europe but might also include some engagement in Asia and more globally if required). Admiral Sir Tim said this role would not be about the detail of products and services. In providing strategic advice he would be focussed on broad insight and his understanding of the machinery of government. He stated he is not seeking to lobby the government in this role.

Dealings in office

6. Admiral Sir Tim noted he was involved in chairing the Defence Innovation, Science and Technology Board in the MOD. He described this as a strategic level position and confirmed he was not involved in the specifics of policy decisions regarding the type of technology Strider is involved in. Admiral Sir Tim was also member of the Executive COmmittee which has oversight of contractors, but Strider does not currently have a contractual or commercial relationship with the MOD. His involvement in other boards did not overlap with the work of Strider (eg Defence Nuclear Enterprise Board, People Committee, Force Development and Chiefs of Staff Committee)

7. Admiral Sir Tim stated that he has had no previous engagement with Strider or any other company in this product area during his time as Vice Chief of the Defence Staff or before.

8. Admiral Sir Tim informed the Committee he was aware that Strider has had some engagement with DSTL (the Defence Science and Technology Laboratory) regarding a pilot. He said there has also been one discussion with the MOD Second Permanent Secretary. He also confirmed this was after he left his role in government and that he was only made aware of this contact when he was discussing a possible role with the company later.

9. Admiral Sir Tim said he did not consider he would offer any particular insight over and above knowledge and experience of government/the MOD.

Departmental view

10. The MOD confirmed the details provided by Admiral Sir Tim on his application form, including that he had no dealings with companies operating in this area of capability.

11. The MOD said that as Vice Chief of the Defence Staff, Admiral Sir Tim *'...had influence at the highest levels of UK MOD. Suitable restrictions will need to be put in place on this appointment to mitigate the risk of perception that his proposed employer could gain undue advantage through use of such contacts. As well as to mitigate the risk that the appointment would give his proposed employer undue*

influence with the MOD or UK government or unfair advantage over other companies’.

12. The MOD recommended that standard conditions be applied, alongside conditions preventing Admiral Sir Tim from advising Strider on specific policy for which he had responsibility as Vice Chief of the Defence Staff and making use of contacts gained in office . The MOD said that *‘The proposed behavioural conditions will mitigate the risk of perception that this appointment could give his proposed employer undue access to new business opportunities by virtue of the contacts Adm Sir Tim Fraser has developed during his Crown Service. It will also mitigate the risk that this appointment would give his proposed employer undue influence with the MOD or UK Government or unfair advantage over other companies’.*