



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

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**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Sir Brandon Lewis CBE MP, former Lord Chancellor and Secretary of State for Justice, Secretary of State for Northern Ireland. Paid appointment with VEON Limited.**

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) on taking up an appointment with VEON Ltd (Veon) as Main Board Director.
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 your time in office, alongside the information and influence a former Secretary of State may offer Veon. 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 Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, 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 risks presented

5. There is no known overlap between Veon's work and your time as Secretary of State for Justice or your previous role as Secretary of State for Northern Ireland. You did not meet with Veon, nor did you make any decisions specific to the

company whilst in office. Therefore, the Committee<sup>1</sup> considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.

6. As a result of your time as a Secretary of State, there are inherent risks regarding your general access to information, contacts and influence within government. The risks are limited because there is no direct overlap between your role in government and your proposed role with Veon. The risks are further mitigated by the fact that you have been out of office for 16 months, which reduces the likelihood that any information you have will be sufficiently up to date.

### The Committee's advice

7. The Committee did not consider this appointment raises any particular propriety concerns under the government's Rules. The inherent risks are appropriately mitigated by the standard conditions below. In particular, they prevent you from drawing on your privileged information and using your contacts and influence within government to the unfair advantage of Veon.
8. In accordance with the government's Business Appointment Rules, the Committee advises this role with **VEON Ltd** be subject to the following conditions:
  - you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
  - for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of VEON Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage VEON Ltd (including parent companies, subsidiaries, partners and clients);
  - for two years from your last day in ministerial office you should not undertake any work with VEON Ltd (including parent companies, subsidiaries, partners and clients) that involves providing advice on the terms of, or with regard to the subject matter of a bid with, or contract relating directly to the work of, the UK government or its arm's length bodies.

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<sup>1</sup> This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; The Rt Hon Baroness Jones of Whitchurch; Michael Prescott; and Michael Weir. Sarah de Gay and Dawid Konotey-ahulu were unavailable. The Rt Hon The Lord Pickles was recused from this application in line with ACOBA's published Code of Practice. This letter contains the Committee's advice, arrived at without his input and which he is sending in his capacity as Chair of the Committee.

9. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests.<sup>2</sup> You are reminded that as a Member of Parliament you have a separate ban on paid lobbying under the Parliamentary Code of Conduct. 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.
10. 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.
11. 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.*" This Rule is separate and not a replacement for the Rules in the House.
12. You must inform us as soon as you take up this role, or if it is announced that you will do so. You must 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.
13. 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 Eric Pickles**

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<sup>2</sup> All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

## **Annex - Material Information**

### The role

1. VEON Ltd is a Dutch-domiciled, telecommunication services and digital connectivity company. It predominantly operates services in Africa and Asia.
2. You said that your role will be paid and carried out on a part-time basis. You told the Committee your role would be internal-facing and your advisory responsibilities will include:
  - Working on the company's vision.
  - Leadership.
  - Setting strategy.
  - No contact or involvement with government.
3. You told the Committee that you were offered the role as Main Board Director through your paid, part-time role as Chair of the Advisory Board at LetterOne. LetterOne is an international investment company based in Luxembourg which has shareholdings in Veon. ACOBA previously advised on your role with LetterOne.<sup>3</sup>

### Dealings in office

4. You advised the Committee that you did not meet with Veon whilst in office; that you did not make any policy, regulatory or commercial decisions specific to Veon; and that you had no access to sensitive information that could unfairly advantage Veon.

### Departmental Assessment

5. Your former departments - the Ministry of Justice and the Northern Ireland Office (NIO) were consulted. Both departments confirmed that:
  - there is no departmental relationship with Veon;
  - you did not make any decisions that specifically impacted the company or its competitors;
  - you did not have any contact with Veon whilst in office; and
  - you did not have any access to sensitive information that could provide Veon with an unfair advantage
6. Neither department had any concerns about this appointment and both suggested it be approved subject to the standard conditions.

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<sup>3</sup> [https://assets.publishing.service.gov.uk/media/6538f600d10f35000d9a68fb/2023-10\\_BL-LetterOne\\_BL\\_-\\_Final\\_advice\\_letter\\_1\\_.pdf](https://assets.publishing.service.gov.uk/media/6538f600d10f35000d9a68fb/2023-10_BL-LetterOne_BL_-_Final_advice_letter_1_.pdf)