



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Air Chief Marshal Sir Mike Wigston KCB CBE, former Chief of the Air Staff at the Ministry of Defence. Paid appointment with Intrepid Growth Partners Inc.

1. Air Chief Marshal (ACM) Sir Mike 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 his proposed role with Intrepid Growth Partners Inc (Intrepid) as a Senior Advisor.
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 ACM Sir Mike made during his time in office, alongside the information and influence he may offer Intrepid. 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. Intrepid is a Canadian private investment fund focussed on supporting global AI companies at the growth stage. There is no known relationship between

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.

Intrepid and the Ministry of Defence (MOD). ACM Sir Mike did not meet with the company, nor did he make any decisions specific to the company during his time in service. Therefore, the Committee² considered there is no reason it might be perceived that this appointment is a reward for decisions made or actions taken in office.

6. Sir Mike will have had access to sensitive information around the UK's defence requirements and capabilities for operations. In particular, he was responsible for overseeing the integration of AI across the air force and his role with Intrepid will be to advise on global AI developments in Aerospace and Defence, helping the company craft investment and growth strategies. There are mitigating factors that help reduce the risks associated with his access to information which could offer Intrepid an unfair advantage:
 - his role with Intrepid faces outside of the UK – in Europe and the US;
 - the MOD confirmed that ACM Sir Mike ceased having access to sensitive information from June 2023. This provides a gap of 12 months between his last having access to privileged insight and information and taking up this work;
 - the MOD confirmed ACM Sir Mike was not involved in commercial details relating to AI requirements in support of the RAF and therefore had no information on competitors or specific commercial information that would offer an unfair advantage to Intrepid.
7. ACM Sir Mike would also have amassed a wide range of contacts during his time in office, in the UK government and beyond, particularly within the defence and security sector. Intrepid invests in technology companies and does not work with the UK MOD, and therefore, the risk that ACM Sir Mike will have any contact with the UK MOD is limited. However, as former Chief of the Air Staff, he could be seen to offer unfair access to the UK MOD.

The Committee's advice

8. The Committee considered that ACM Sir Mike's role in the MOD presents real and perceived risks associated with his access to information, particularly in relation to the UK's capability requirements and the implementation of AI technology in the air force.
9. The Committee recognised that ACM Sir Mike plans not to work in the UK sector for Intrepid. Further, as the former head of the air force there is risk, albeit limited given this role, that he could offer the company unfair access

²This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Sarah de Gay; Baroness Jones of Whitchurch; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir. Hedley Finn OBE was absent.

and influence should Intrepid look to work with UK companies that operate in partnership with the UK MOD.

10. In the circumstances, the Committee agreed with the MOD and a condition should be imposed which prevents him from advising on the UK defence sector ensuring his role is as he has described it, and unrelated to the UK MOD. This includes advising that he must have no direct engagement with the UK government on Intrepid's behalf. This approach is in line with the Committee's previous advice in relation to ACM Sir Mike.
11. The conditions below make it clear that he must not make improper use of his access to privileged information, contacts and influence from his time in government service to unfairly advantage Intrepid.
12. The Committee advises, under the government's Business Appointment Rules, that ACM Sir Mike's role with **Intrepid Growth Partners Inc** 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 become personally involved in lobbying the UK government, MOD, or their arm's length bodies on behalf of Intrepid Growth Partners Inc (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage Intrepid Growth Partners Inc (including parent companies, subsidiaries, partners and clients);
 - 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 other governments and organisations for the purpose of securing business or investment opportunities for Intrepid Growth Partners Inc (including parent companies, subsidiaries and partners);
 - for two years from his last day in Crown service, he should not provide advice to Intrepid Growth Partners Inc (including parent companies, subsidiaries or partners) 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, the MOD and its trading funds, or their arm's length bodies; and

- for two years from his last day in Crown service, he should not advise Intrepid Growth Partners Inc (including parent companies, subsidiaries or partners) or its clients on the UK defence market; and he must not directly engage with the MOD/UK government or its arm's length bodies on Intrepid Growth Partners Inc's behalf (including parent companies, subsidiaries, partners and clients).
13. 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 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' Interests³. 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.
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 or the interests of the organisation by which they are employed, or to whom they are contracted or with which they hold office*'.
16. ACM Sir Mike must inform us as soon as he takes up employment with this organisation, or if it is announced that he will do so. He must also inform us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.
17. 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.

Yours sincerely

³ All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on 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

Jess Barrow
Committee Secretariat

Annex – material information

The role

1. Intrepid is a Canadian private investment fund focussed on supporting global AI companies at the growth stage. It invests in, and partners with, companies in multiple sectors across North America and Europe. It works across a number of sectors including defence, healthcare and manufacturing.
2. ACM Sir Mike wishes to take up a part-time, paid role with Intrepid as a Senior Advisor. ACM Sir Mike said that his role will be to advise the Managing Partner and leadership team on global AI developments in Aerospace and Defence, helping it craft investment and growth strategies. He said that his role will be based outside of the UK, mainly in the US.
3. ACM Sir Mike said that he will not lobby government or the UK MOD, nor will he use the military network that he gained in office.

Dealings in office

4. ACM Sir Mike said he was not responsible for any specific policy or regulatory areas as Chief of the Air Staff. He said that his role was operational, overseeing the delivery of defence policy and priorities to meet the Chief of Defence Staff's objectives. ACM Sir Mike said that the MOD does not have a relationship with Intrepid and he did not meet with the company whilst in office.

Departmental assessment

5. The MOD confirmed that it has no known relationship with Intrepid, nor did ACM Sir Mike meet with the company whilst in office.
6. The MOD noted while Air Command has dealings with companies offering AI technology support and Sir Mike was head of Air Command, commercial responsibility was delegated to others within his team and he had no involvement in this.
7. The MOD said whilst he made no decisions specific to the company, the MOD said that Sir Mike will undoubtedly have strategic insight into the RAF's use of AI and its capabilities – having overseen the development of capability on AI into Air Command. However, his role is based overseas which limits the risk of unfair access to information. Further, it confirmed that ACM Sir Mike has been out of office since June 2023.
8. The MOD recommended that further to the standard conditions, ACM Sir Mike's role with Intrepid should be limited so that he is prevented from advising drawing on matters related to his time in office and therefore should not advise on the UK defence market.