



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Cassian Horowitz, former Head of Strategic Comms and Digital at No 10 Downing Street. Paid commission providing digital communications services to Vedanta Resources Ltd under his independent consultancy.

1. Mr Horowitz sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for former Crown Servants (the Rules) on his proposal to work with Vedanta Resources under his independent consultancy.
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 Mr Horowitz' time in office, alongside the information and influence a former Special Advisor in No.10 Downing Street may offer Vedanta. 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.

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.

The Committee's Consideration of the Risk

5. The Committee considered this commission to be consistent with the description of Mr Horowitz' consultancy - providing digital content services to brands and CEOs, using experience originally gained prior to him joining government. He stated that these services include:
- Helping brands with their positioning. For example, their tone of voice online, which social channels they should use and how they should present themselves.
 - Creating branding for business like logos or brand names. Helping them with their overall look and feel online.
 - Running social media accounts on an ongoing basis. This could include writing the words, creating graphics and posting on a variety of platforms like LinkedIn or X or TikTok.
 - Creating large scale content like videos or digital advertising boards, helping to both come up with the ideas and produce the content.
 - Setting up websites including the design and the implementation as well as SEO.
 - Working with the creator community to introduce them to businesses and inviting them to events, organise interviews etc.
 - Running paid digital ads across a variety of social media platforms as well as search.
6. There is no known commercial relationship between No.10 or the wider government and Vedanta Resources. It is significant that Mr Horowitz did not work on commercial matters or in procurement during his time in office; nor did he meet with or make any decisions relating to the company. Further, he came into government as a result of his experience and skills within the digital communications sector. Therefore, the Committee² considered that the risk he could be seen to have been offered this role as a reward for, was low.
7. There is a risk given that Vedanta Resources has had previous interest in the work of the UK government. It is important that Mr Horowitz' said that he will not have contact with government, nor will he lobby government. Further, his work with Vedanta Resources is narrowly defined – to manage the social media presence of its Chairman.

The Committee's advice

8. The Committee determined the risks identified in this application can, in view

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

of the fact that over five months have already passed since Mr Horowitz was in government, be appropriately mitigated by the conditions below. These make it clear he cannot make use of any privileged access to information, contacts or influence gained from his time in government service to the unfair advantage of Vedanta Resources.

9. In the circumstances, the Committee's advice in accordance with the government's Business Appointment Rules is that this work with **Vedanta Resources Ltd** should be made subject to the same conditions attached to Mr Horowitz' independent consultancy:

- 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 or in any capacity in which he continues to represent the UK government;
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government and its arm's length bodies on behalf of Vedanta Resources Ltd under his independent consultancy (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 Vedanta Resources Ltd under his independent consultancy (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to or on behalf of Vedanta Resources Ltd under his independent consultancy (including parent companies, subsidiaries, partners and clients) 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 any of its arm's length bodies; and
- for two years from his last day in Crown service, before accepting any commissions for his independent consultancy and or/before extending or otherwise changing the nature of his commissions, he should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.

10. The advice and the conditions under the government's Business Appointment Rules relate to Mr Horowitz' 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.³ 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.

11. 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.
12. 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*'.
13. Mr Horowitz must inform us as soon as his appointment is live or is announced. 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. He must also inform us if he proposes to extend or otherwise change the nature of this work as, depending on the circumstances, it may be necessary for him to make a fresh application.
14. Once this work has been publicly announced or set up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

Yours Sincerely,

Jess Barrow
Committee Secretariat

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 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. Vedanta Resources is a global natural resources and technology conglomerate operating across India, South Africa, Liberia and Namibia. It has interests in Oil & Gas, Zinc-Lead-Silver, Aluminium, Iron Ore, Steel, Copper, Ferro Alloys, Power, Nickel, Semiconductors and Glass. Vedanta is listed on the Bombay Stock Exchange and the National Stock Exchange. Vedanta was based in London, but has since moved to India.
2. Mr Horowitz said that Vedanta Resources wants to commission him to run the online social media profiles of the Chairman of Vedanta, Anil Agarwal, including LinkedIn, YouTube and Twitter, promoting his charitable activities and, 'journey to becoming a successful businessman.' He stated that he will not have any contact with government.

Dealings in office

3. Mr Horowitz said that he did not make any policy, regulatory or commercial decisions specific to Vedanta Resources in office. He said that his former department does not have a particular relationship with the company, nor did he meet with Vedanta whilst in office.

Departmental assessment

4. The Cabinet Office said that Mr Horowitz did not make any decisions relating to Vedanta Resources in office, nor did he meet with the company. The Cabinet Office did not consider that he had access to any information that could offer Vedanta Resources a particular advantage.
5. The Cabinet Office said it has a previous record of official dealings with Vedanta Resources, and the company has demonstrated its intent to influence the UK policy scene. It engaged the services of APCO Worldwide Ltd, a registered consultant lobbyist, between April and September 2021.⁴ Its chairman and majority owner, Anil Agarwal, has met with UK officials on occasion including the then candidate for Prime Minister, Rishi Sunak, in August 2022 to '*discuss developments in infrastructure and ways to collaborate to strengthen relationships with other countries*'.⁵ However, the department noted that Mr Horowitz had no direct exposure to any relevant areas of decision-making in government and that his proposed commission has no link to lobbying.

⁴ https://orcl.my.site.com/CLR_Client_Profile?Id=a084J00000ANWK2QAP

⁵ https://x.com/AnilAgarwal_Ved/status/1555069672843669507

6. The Cabinet Office considered that Mr Horowitz 'work with Vedanta Resources was consistent with the description of his independent consultancy and it recommended the standard conditions.