

*From the Chair*



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

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**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Anne-Marie Trevelyan, former Minister of State for Indo-Pacific at the Foreign, Commonwealth and Development Office. Paid appointment with Helsing Limited.**

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on your role as a Strategic Advisor with Helsing Limited (Helsing).
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 you made during your time in office, alongside the information and influence you may offer Helsing. 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 this appointment in any other respect - 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. Helsing is a German artificial intelligence (AI) firm, with a subsidiary in the UK. It operates in the defence sector. It uses AI to develop and implement methods of security and data processing for democratic governments. Helsing has recently confirmed £350 million of investment into the UK for the development of AI systems, as part of the UK's wider defence cooperation with Germany. Helsing is a framework contractor with the UK government to provide cloud software for AI use.
6. You said that you will work as a Strategic Advisor as part of a project to advise Helsing on expanding into Australia. You will advise Helsing on how to make better decisions in relation to its expansion and market readiness.
7. Whilst you did not make any decisions specific to Helsing in office, you did have contact with Helsing, and the Committee<sup>1</sup> carefully considered if this could lead to a reasonable perception of this role being offered as a reward for your actions. This pertains to enquiries you made on behalf of Helsing regarding a delay to the outcome of an export licence application made by the firm in January 2024.
8. The FCDO said it was reasonable that you might ask about this delay and confirmed that your actions did not result in any tangible commercial benefit to Helsing. There is no suggestion or evidence that this inquiry resulted in a change to the process or outcome. Further, the FCDO confirmed that the licence was granted by the ECJU<sup>2</sup> in accordance with the publicly available criteria, and that you did not influence this decision. It is also relevant that you have a long-standing personal relationship with the Chief of Staff to Helsing's CEO, separate to your time in government. In these circumstances, the Committee considered the risk that you could reasonably be perceived as having been offered this role as a result of your actions in office, is limited.
9. Given that this role is based in Australia, a geographic region which formed part of your ministerial portfolio, there is a risk that you may have had access to sensitive information on defence/security, and other foreign policy matters such as trade, that could benefit Helsing as it looks to expand in Australia. There are factors that limit the associated risks:
  - The information to which you had access was general, and not specific - it would apply to any organisation that might have an interest in the areas you had responsibility for in office.

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<sup>1</sup>This application for advice was considered by Andrew Cumpsty; Isabel Doherty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Pickles; Michael Prescott; The Baroness Thornton; and Mike Weir.

<sup>2</sup>The Export Control Joint Unit (ECJU) is a triumvirate between the FCDO, Ministry of Defence (MOD) and Department for Business and Trade (DBT), which decides on the outcome of export license applications.

- The FCDO is unaware of any specific information that would grant Helsing an unfair advantage.
  - You have been out of office for over eight months – creating a significant time gap since you last had access to sensitive information.
  - Foreign and defence/security matters are likely to have moved on since you left office, with the changes in the foreign policy landscape and government since you were in ministerial office.
10. You told the Committee that this role will include incidental contact with UK government officials, most likely at the British High Commission<sup>3</sup> – to inform them of your presence in the country, and the purpose of your visit. You confirmed you will not contact them on behalf of Helsing, nor will you seek to influence UK officials on Helsing's behalf. In accordance with the lobbying ban that applies to all ministers for two years after leaving office under the Rules, you must avoid engaging in any activity that could reasonably be seen as seeking to influence UK government decisions, or otherwise granting Helsing an unfair advantage in the UK or abroad.
11. You told the Committee that your role will be focused on growth and you may work with other organisations to facilitate this. Your network and contacts gained whilst at the FCDO also gives rise to a risk that you could offer unfair access to other organisations you held strategic relationships with as a minister, for example, within the Australian Government.

#### The Committee's advice

12. The Committee determined that the greatest risk in this application is that you may be seen to offer unfair access to UK officials for Helsing, or to Australian government officials for the purposes of securing new business as Helsing expands.
13. The Committee determined these risks can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time in ministerial service to the unfair advantage of Helsing.
14. The Committee advises, under the government's Business Appointment Rules, that this appointment as Strategic Advisor with **Helsing Limited** should be subject to the following conditions:

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<sup>3</sup> Many, if not all of these contacts can be found online, and are available to be contacted by any member of the public: <https://www.gov.uk/world/organisations/british-high-commission-canberra>

- 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 government or its arm's length bodies on behalf of Helsing Limited (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 Helsing Limited (including parent companies, subsidiaries, partners and clients);
  - for two years from your last day in ministerial office, you should not undertake any work with Helsing Limited (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 government, or its arm's length bodies; and
  - for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time in office and in external organisations, including foreign governments, for the purpose of securing business for Helsing Limited (including parent companies, subsidiaries and partners).
15. 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>4</sup> 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.
16. 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.
17. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/minister '*should not engage in*

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<sup>4</sup> 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.

*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.'*

18. 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, as it may be necessary for you to make a fresh application.
19. 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**

## Annex - Material Information

### The role

1. Helsing Ltd (Helsing) is an artificial intelligence firm, operating in the defence sector, with a presence in the UK. It uses artificial intelligence in developing and implementing methods of security and data processing for democratic governments. Helsing describes itself as working with governments and industry partners to transform the capabilities of existing hardware assets. It has four products:
  - Altra: Altra intelligently connects all elements of the battlefield to transform the accuracy, speed and robustness of land forces. It appears to be focused on increasing acquisition and precision of targeting, via drones etc.
  - HX-2: a software-defined strike drone. Onboard AI prevents hostile electronic warfare. A human operator stays in or on the loop for all critical decisions. HX-2 is in the production stage with some of the core tech already in use in Ukraine.
  - Cirra: addresses anti-aircraft radars, helping pilots and aircrafts to classify and read the intent of unknown anti-aircraft emitters.
  - Project Centaur: a large-scale AI initiative to develop autonomous air combat capabilities including, for example, FCAS, GCAP and other advanced air combat programmes across Europe. It is in development.
2. The MOD has recently signed a treaty with Germany, securing defence cooperation across all domains; land, sea, air, cyber, and space.<sup>5</sup> This includes major investments in the defence industry by Helsing. The new cooperation is focused on, amongst other things, industrial cooperation via:
  - a new investment of £350 million into the UK for the development of AI systems, confirmed by Helsing.<sup>6</sup> Rheinmetall announced plans to build a new gun barrel factory in Britain, supporting 400 jobs and nearly half a billion pounds of benefit to the UK economy.<sup>7</sup>

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<https://www.gov.uk/government/news/landmark-uk-germany-defence-agreement-to-strengthen-our-security-and-prosperity>

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<https://www.janes.com/osint-insights/defence-news/air/helsing-to-mass-produce-ai-enabled-hx-2-uav-in-uk>

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<https://www.army-technology.com/news/new-uk-site-will-manufacture-rch-155-artillery-and-120mm-tank-barrels/>

Cooperation will also include:

- army training
- exercising
- innovating together on NATO's eastern flank
- protecting vital undersea cables in the North Sea
- advancing innovation between our armies to shape the future of NATO warfare; driven by AI and emerging technologies.

3. Helsing also has a contract with the UK government to provide cloud software for AI use in Land.<sup>8</sup>
4. You told the Committee this will be a paid, short-term project with Helsing. Your role as a Strategic Advisor will involve advising Helsing on its expansion into Australia, and will entail:
  - assisting the company in making better decisions in relation to this expansion
  - advising on market readiness
  - undertaking discussions on defence technology issues broadly, with a range of stakeholders
  - speaking with universities and/or think tanks to set up research fellowships, and promote Helsing's technology in Australia.

You added that you will not advise Helsing on contracts, broker relationships in Australia for potential growth opportunities, nor advise on anything related to export controls.

5. You said that as a former minister working abroad, you will likely have contact with UK government officials in Australia – in particular, at the British High Commission in Canberra. You said that this contact will be incidental – to tell them that you are in the country. You said that you will not use this contact to further Helsing's agenda, and will not lobby the government.

#### Dealings in office

6. You told the Committee that as Minister for Indo-Pacific at the FCDO:
  - you had contact with the Chief of Staff to the CEO of Helsing relating to an application for an export license that was delayed.
  - you did not make any policy, regulatory, operational or commercial decisions that were specific to Helsing.

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<sup>8</sup> <https://www.applytosupply.digitalmarketplace.service.gov.uk/g-cloud/services/902635197281891>

- you did not have any access to commercial information that could grant Helsing an unfair advantage over its competitors, though you did have access to high level intelligence information about the geographic region for which you were responsible.
- there is a departmental relationship between Helsing and the FCDO – because Helsing makes use of export licences, for which it applies jointly to a body called the Export Control Joint Unit (ECJU)<sup>9</sup> – which is served by the MOD, DBT and FCDO.

7. With regard to your inquiry into Helsing's export license application, you told the Committee the following information:

- You were asked by Peter Quinn,<sup>10</sup> the Chief of Staff to the CEO of Helsing, to look into why Helsing's export license application for military software for use in Ukraine, was delayed.
- Mr Quinn is a personal contact of yours, whom you have known for over 20 years.
- The application was made by Helsing at the end of January 2024; when, some time after the 20 working day expected timeline, the company had not heard back from you, Mr Quinn contacted you. You requested the details of the applications (e.g. reference numbers) from colleagues so you could make enquiries into its status and the expected time frame for a decision.
- Whilst you had responsibility for export controls in your ministerial portfolio, in practice these decisions had always been made by the Foreign Secretary (during your tenure) and you were not involved, including in this instance. This was also for an export license outside of your geographic remit.
- Prior to making enquiries into this application, you had not had any involvement or dealings with the ECJU team.
- You had no sight of the outcome for this application.

### Departmental assessment

8. The FCDO provided the following information to the Committee:

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<sup>9</sup> Controlled goods (such as military items, firearms, etc and goods subject to trade sanctions) are regulated through a system of export controls and licensing. The ECJU administers the UK's system of export controls and licensing for military and dual-use items. Reasons export licenses may be required can be found here:

<https://www.great.gov.uk/learn/categories/selling-across-borders-product-and-services-regulations-licensing-and-logistics/get-your-good-out-uk/understand-export-licensing/>

<sup>10</sup> Mr Quintin was a former MOD SpAd and was advised under the Business Appointment Rules: <https://www.gov.uk/government/publications/mod-business-appointment-rules-applications-completed-from-january-to-march-2024/mod-business-appointment-rules-applications-completed-from-january-to-march-2024>



- There is no contractual relationship between Helsing and the FCDO.
- Helsing is a stakeholder via applications for export licences, which go through the FCDO as part of the process.
- Whilst you had oversight of export controls in your role, you did not make any decisions relating to, or specific to Helsing in office – about export controls or anything else.
- You had access to privileged, high sensitivity information on defence, intelligence, and foreign policy material during your time in office, but as it related to your geographic brief.
- It is not aware of any specific information that could grant an unfair advantage to Helsing.

9. In terms of export licence applications generally, the FCDO provided the following information:

- Controlled goods (such as military items, firearms, etc, and goods subject to trade sanctions) are regulated through a system of export controls and licensing. The Export Control Joint Unit (ECJU) administers the UK's system of export controls and licensing for military and dual-use items. More information can be found here: <https://www.great.gov.uk/learn/categories/selling-across-borders-product-and-services-regulations-licensing-and-logistics/get-your-good-out-uk/understand-export-licensing/>
- The Department for Business and Trade (DBT) has overall responsibility for the statutory and regulatory framework of export controls, and for decisions to grant or refuse an export licence.
- The FCDO and the MOD are DBT's principal advisers on the Strategic Export Licensing Criteria,<sup>11</sup> which are used to assess license applications.
- You had responsibility for export license applications in the geographic areas under your portfolio (the Indo-Pacific). Whilst in practice this could have fallen to the Foreign Secretary, and you did not have regular dealings with the ECJU team, you were still the responsible

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<sup>11</sup> Which can be found online:

<https://questions-statements.parliament.uk/written-statements/detail/2021-12-08/hcws449#:~:text=Spring%20of%202022.-,The%20Strategic%20Export%20Licensing%20Criteria,-This%20statement%20of>  
More information can be found here:

<https://researchbriefings.files.parliament.uk/documents/CBP-9494/CBP-9494.pdf> and here:

<https://www.gov.uk/government/publications/strategic-export-controls-quality-and-methodology-report/export-licensing-statistics-quality-and-methodology-information#:~:text=Export%20licences,goods%20due%20to%20be%20exported> and here:

<https://www.gov.uk/guidance/uk-strategic-export-controls#:~:text=guidance%20on%20exemptions.-,When%20export%20controls%20apply,are%20covered%20by%20trade%20sanctions>

minister and would have been routinely copied into submissions relevant to export licensing.

- You were previously the Secretary of State at the Department for International Trade, and having promulgated the current Strategic Export Licence Controls framework in 2022, you have good knowledge about export licensing. The department noted that use of this information would not be improper given the process is in the public domain.

10. With regard to your inquiries into Helsing's export licence application, the FCDO said the following:

- You sought information about Helsing's overdue export licence application – which was to support the situation in Ukraine.
- Your enquiries focused on asking for timelines on when the FCDO's assessment would be finalised and sought to expedite it. This was evidenced by information from correspondence from your private office.
- Whilst you were in contact with government officials about the progress of Helsing's application, there was no evidence of any impropriety. It considered you were likely to have been motivated by legitimate concern about supporting Ukraine's war effort.
- Your enquiry did not result in any commercial benefit to Helsing, or to a change in the outcome of the application.
- The licence was granted by the ECJU in accordance with the strategic license criteria. You did not influence this decision.
- No one person can influence these decisions as a result of the process.

11. The FCDO said that you are likely to have met and or/built relationships with UK government officials in Australia during your time in office, which could be relevant to your new role at Helsing. The FCDO said that this could raise risks in terms of perception of influence, lobbying, and use of contacts – which would need to be mitigated alongside the standard conditions.