



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 Alloyed Limited.

1. Air Chief Marshal (ACM) Sir Mike 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 appointment with Alloyed Limited (Alloyed) 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 Alloyed. 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 risks presented

5. Alloyed is a UK-based design & engineering company that is involved in metal component innovation. It uses digital platforms for the design and fabrication

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.

of alloys and alloy components through additive manufacture. Its products and solutions cover all aspects of component design and manufacture and have applicability in various sectors, including aerospace and defence.

6. There is no direct overlap between ACM Sir Mike's responsibilities in office and the work of this company. There is no current relationship between the Ministry of Defence (MOD) and Alloyed, though it previously received funding for research and development from the Defence Science and Technology Laboratory - outside of ACM Sir Mike's area of responsibility. ACM Sir Mike did not meet with Alloyed, nor did he make any decisions specific to the company whilst he was at the MOD. The Committee² therefore considered the risk this appointment could be reasonably perceived as a reward for decisions made, or actions taken in office, is low.
7. The work which Alloyed engages in could overlap with or be affected by the aerospace and defence sector, given that its products have applicability in these areas. ACM Sir Mike was Head of the Royal Air Force and therefore would have had access to high-level information within the MOD and government. This could be useful to any organisation operating within defence or companies tangentially affected by these matters. The MOD did not consider that ACM Sir Mike had access to information specific to Alloyed and its work. This risk is therefore general in nature, rather than specific to this company or this role. It has been over 18 months since he last had access to information and decision making within the MOD, placing a gap between his access and his taking up this work.
8. There remains a risk associated with his access to information, which is most likely to arise if ACM Sir Mike is asked to advise Alloyed on matters related to his responsibilities in service. This is possible given Alloyed could have an interest in exploring the use of its technology within the defence industry in the UK, whether that be with the UK MOD or its industry partners. It is significant that Alloyed confirmed that his role excludes any dealings with the UK government and specifically, the UK MOD.
9. ACM Sir Mike would also have amassed a network of contacts across the highest levels of the MOD and government. This could be seen to offer Alloyed unfair access to the MOD and government, in particular, should Alloyed seek a similar research and development relationship with the UK government through the Defence Science and Technology Laboratory. It would be difficult to mitigate the reasonable concerns that any contact with the MOD or government would be seen as seeking to influence on the company's

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

behalf, which he is prevented from doing for two years under the government's Rules. This risk is limited given ACM Sir Mike plans on having no contact with the UK government in this role.

10. The Committee noted the risks associated with the nature of ACM Sir Mike's role in building Alloyed's business strategy and growth plan. Specifically the risk that the former Air Chief Marshall may be seen to offer access to new business in defence, aerospace and foreign governments/ militaries as a result of his contacts and network in the defence industry and allied militaries while in service.

The Committee's advice

11. The Committee considered that ACM Sir Mike's former role in the MOD presented real and perceived risks associated with his access to information, particularly in relation to aerospace and defence matters. Given his profile as the former Chief of the Air Staff, there is also a significant risk that he could offer Alloyed unfair access and influence should Alloyed wish to work with government. These risks are limited given this is just one aspect of Alloyed's potential business which has applications across any number of sectors. Nevertheless, the Committee agreed with the MOD that it is necessary to impose conditions which prevent ACM Sir Mike from advising the company on its UK defence sector business and from engaging with the UK government/the UK MOD on behalf of Alloyed.
12. These conditions, alongside the time that has now passed since he left office and the conditions below, appropriately mitigate the risks in his case. These conditions seek to prevent ACM Sir Mike from drawing on his privileged information, contacts and influence gained in Crown service to the unfair advantage of Alloyed. It is significant that Alloyed confirmed in writing to the Committee that ACM Sir Mike's role will not involve advising on its UK defence sector business, or engaging with the UK government and the MOD on its behalf.
13. The Committee advises, under the government's Business Appointment Rules, that ACM Sir Mike's role with **Alloyed Limited** 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, NATO allied

militaries or their arm's length bodies on behalf of Alloyed Limited (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 Alloyed Limited (including parent companies, subsidiaries, partners and clients);

- for two years from his last day in Crown service, he should not provide advice to Alloyed Limited (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, NATO allied militaries, the MOD and its trading funds, or their arm's length bodies;
- 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 in external organisations (including other governments) for the purpose of securing business for Alloyed Limited (including parent companies, subsidiaries and partners); and
- for two years from his last day in Crown service, he should not advise Alloyed (including parent companies, subsidiaries or partners) or its clients on the UK defence market; and he must not directly engage with the MOD/NATO/UK government or its arm's length bodies on Alloyed Limited's behalf (including parent companies, subsidiaries, partners and clients)

14. The advice and the conditions under the government's Business Appointment Rules relate to his 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.

15. 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.

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

16. 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’*.
17. 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, by emailing the office at the above address. 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.
18. 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

Samantha Ria Shahriar
Committee Secretariat

Annex – Material information

The organisation

1. Alloyed Limited (previously known as OxMet Technologies Limited) is a design & engineering company headquartered in Oxford, UK. It is involved in metal component innovation and uses digital platforms for the design and fabrication of alloys and alloy components through additive manufacture. Its products and solutions cover all aspects of component design and manufacture. According to its website, it produces the world’s most advanced metal parts. Its products have applicability in various sectors, including aerospace and defence.
2. The company has previously worked with The Defence Science and Technology Laboratory⁴ (an executive agency of the Ministry of Defence) on research and development projects. It has also received funding for certain

⁴ [Defence Science and Technology Laboratory - GOV.UK](https://www.gov.uk/government/organisations/defence-science-and-technology-laboratory)

projects from overseas government organisations, such as the Development Bank of Japan.

The role

3. ACM Sir Mike wishes to take up a part-time role with Alloyed as a Senior Advisor. The role involves:
 - acting as a member of the Defence Sector Advisory Committee, tasked with providing the company's CEO and on occasion the Board of the Company advice on overall defence strategy, and in particular international strategy;
 - helping the company craft their business strategy and growth plan; and
 - assisting the Company in its senior management recruitment efforts.

ACM Sir Mike would have no responsibilities whatsoever which entail either the promotion of Alloyed with the MOD or provision of advice on current or potential defence platforms. The role would have no decision-making authority.

4. ACM Sir Mike confirmed his role would not involve contact with government.

Correspondence with Alloyed

5. Alloyed confirmed in writing its understanding of, and agreement to comply with, the Committee's advice. Further, the company confirmed ACM Sir Mike's role will not involve lobbying of the UK government.
6. Alloyed stated that to ensure compliance with this advice:
 - the Company would not invite ACM Sir Mike to participate in or comment on meetings with anybody in the MOD which relate to specific programmes or to selling the Company's capabilities to the MOD in general;
 - the Company would neither seek nor agree to receive any privileged information; and
 - the Company would comply with any further conditions ACOBA put on the terms of ACM Sir Mike's service.

Dealings in office

7. ACM Sir Mike said he had no involvement in policy, contractual and/or commercial decisions specific to Alloyed. He also said that he did not have official dealings/ contact with Alloyed during his time in service. He confirmed

the Defence Science and Technology Laboratory worked with Alloyed on unspecified research and development projects.

Departmental assessment

8. ACM Sir Mike will have made strategic and operations decisions, in particular as they related to aerospace and generally the RAF's operations and capabilities. These could have incidentally or tangentially affected Alloyed given the applicability of its products in these areas. However, the MOD told ACOBA that ACM Sir Mike made no regulatory, commercial or policy decisions specific to Alloyed.
9. The MOD stated that ACM Sir Mike did not have contact with Alloyed during his time in service and confirmed that it has not had a relationship with it for the last two financial years.
10. The MOD stated that ACM Sir Mike did not have access to information specific to Alloyed, but he would have had insight at the highest levels on the areas for which he held responsibility and managed relationships with contractors/ organisations like Alloyed, but was not responsible for appointing them.
11. The MOD recognised that ACM Sir Mike would have contacts across the top of UK defence which could be beneficial to any organisation, including Alloyed. Additionally, the MOD said that as Chief of the Air Staff, Sir Mike will have acquired a range of contacts in foreign governments and external organisations, which could give Alloyed a disproportionate advantage in developing its business.
12. The department recommended that further to the standard conditions, ACM Sir Mike's role should be limited so that he is prevented from:
 - advising on the UK Defence market or on matters which he had specific responsibility for at the MOD; and
 - not directly engaging with the MOD/UK government or its arm's length bodies on Alloyed's behalf.