



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

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

Website: [www.gov.uk/acoba](http://www.gov.uk/acoba)

May 2025

**BUSINESS APPOINTMENT APPLICATION: General Sir Patrick Sanders KCB CBE DSO ADC OBE, former Chief of the General Staff at the Ministry of Defence (MOD). Paid appointment with Herminius Holdings Limited.**

1. General Sir Patrick Sanders 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 taking up an appointment with Herminius Holdings Limited (Herminius) as a Non-executive Chairman.
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 General Sir Patrick's time in office, alongside the information and influence the former Chief of the General Staff may offer Herminius. 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 Rules<sup>1</sup> 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.

---

<sup>1</sup> 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 risks presented

5. Herminius is a strategic business intelligence company that provides independent intelligence and advice for risk based decision-making purposes. It advises on a range of matters including geopolitical and public policy developments through to transactions, talent assessment, strategy and disputes. It works with a variety of private sector clients and governments.
6. The Committee<sup>2</sup> noted that there is no relationship between the MOD and Herminius. General Sir Patrick did not meet with Herminius whilst in government, nor did he make any decisions specific to the company. The Committee therefore considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
7. The work which Herminius engages in could overlap or be affected by the defence and security sectors. In office, General Sir Patrick was Head of the Army and would have had access to high-level classified information within the MOD and government. This could be useful to any organisation operating in the defence and security sectors or companies affected by these matters. The MOD did not consider that General Sir Patrick had access to information specific to Herminius and its work. This risk is therefore general in nature, rather than specific to this company or role. It has been over eight 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 General Sir Patrick is asked to advise clients on matters related to his responsibilities in service. This is possible given the clients he will work with are unknown. It is significant that Herminius confirmed that his role will exclude advising on matters relating to the UK defence sector and lobbying government.
9. General Sir Patrick would also have amassed a network of contacts across the highest levels of the MOD and government. This could be seen to offer Herminius unfair access to the MOD and government given Herminius' work in the context of geopolitics and defence and its work with government clients. Though General Sir Patrick confirmed that his role would not involve contact with government, it would be difficult to mitigate reasonable concerns that any contact he had with the MOD or government would be seen as seeking to lobby, which he is prevented from doing for two years under the government's Rules.

---

<sup>2</sup> 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.

10. The Committee noted the risks associated with the nature of General Sir Patrick's role in building the company's business into Europe, the Middle East, United States and Asia Pacific. Specifically the risk that the former Chief of General Staff may be seen to offer access to new business in defence and foreign governments/militaries as a result of his service.

#### The Committee's advice

11. The Committee considered that General Sir Patrick's former role in the MOD presented real and perceived risks associated with his access to information, particularly in relation to defence and security matters. Given his profile as the former Chief of the General Staff, there is also a significant risk that he could offer Herminius unfair access and influence should Herminius and/or its clients wish to influence policy decisions and/or work with government.
12. The Committee has therefore imposed conditions which prevent General Sir Patrick from advising on UK Defence and from engaging with the UK government/the UK MOD on behalf of Herminius and its clients.
13. 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 General Sir Patrick from drawing on his privileged information, contacts and influence gained in Crown service to the unfair advantage of Herminius. It is significant that Herminius confirmed in writing to the Committee that it accepts this advice and will ensure compliance with the conditions in this letter.
14. The Committee advises, under the government's Business Appointment Rules, that General Sir Patrick's role with **Herminius Holdings 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, or their arm's length bodies on behalf of Herminius Holdings 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 Herminius Holdings Limited (including parent companies, subsidiaries, partners and clients);

- for two years from his last day in Crown service, he should not provide advice to Herminius Holdings 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, 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 Herminius Holdings Limited (including parent companies, subsidiaries and partners);
- for two years from his last day in Crown service, he should not advise Herminius Holdings Limited or its clients on UK defence; nor should he have any engagement on behalf of Herminius Holdings Limited (including parent companies, subsidiaries, partners and clients) with the UK government.

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>3</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 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*

---

<sup>3</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 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.

*organisation by which they are employed, or to whom they are contracted or with which they hold office’.*

18. General Sir Patrick 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.
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.

Yours sincerely

Samantha Ria Shahriar  
**Committee Secretariat**

## **Annex – Material information**

### The organisation

1. Herminius Holdings Limited (Herminius) is a strategic intelligence firm that provides independent intelligence and advice for risk based decision-making purposes. According to its website, it draws insight from a global network, advising on a range of matters including geopolitical and public policy developments through to transactions, talent assessment, strategy and disputes. By doing so, Herminius describes itself as helping clients ‘...*identify opportunities, protect profits, support negotiations – and enable [its clients] to solve the most important commercial, political, and security problems facing [their] organisation*’.<sup>4</sup>
2. It works with a range of clients including financial institutions, private equity investors, multi-national companies, ultra-high-net-worth individuals & family offices, and a number of government clients. For government clients in particular, it provides specialist support and advice to design and deliver complex, bespoke training and capacity-building.
3. Herminius was previously known as Aegis Risk Advisory – the intelligence arm of defence company Aegis Defence Services. Aegis underwent acquisition in 2015 by GardaWorld which retained Aegis’ overseas defence and security services. The intelligence arm (Aegis Risk Advisory) was bought

---

<sup>4</sup> <https://herminius.com/about-us/>

out by Dominic Armstrong (President of Herminius and co-founder of Aegis), and rebranded as Herminius in 2016/17.<sup>5</sup>

### The role

4. General Sir Patrick wishes to take up a part-time role with Herminius as a Non-executive Chairman. He stated that his role will involve:
  - chairing the quarterly board
  - providing advice and insight on strategy formation
  - geopolitical insight and analysis
  - risk management and resilience
  - support building the business out into Europe, the Middle East, United States and Asia Pacific
  - ensuring high standards of corporate governance and leadership
5. He confirmed he would have no contact with government.
6. Herminius confirmed General Sir Patrick's role does not involve advising on the UK defence sector or lobbying government, and that it understands and accepts this advice and will ensure compliance with the conditions in this letter. It also provided the following information:
  - it has not previously advised, and is not currently advising any clients on matters relating to the UK defence sector;
  - it does not work with UK government;
  - it does not lobby government on behalf of its clients; and
  - if these circumstances change, it will put in place *'appropriate measures to ensure that General Sir Patrick has no involvement in them, per the requirements [the Committee] have made'*.

### Dealings in office

7. General Sir Patrick said he had no involvement in policy, contractual and/or commercial decisions specific to Herminius. He also said that he did not have official dealings/ contact with Herminius during his time in service and that the MOD does not have a relationship with the company.

---

<sup>5</sup> <https://herminius.com/meet-the-team/#:~:text=Dominic%20Armstrong,Amro%20Asian%20Securities>

### Departmental assessment

8. Chief of the General Staff, General Sir Patrick will have made strategic decisions that could have incidentally or tangentially affected Herminius and/or its clients. However, the MOD told ACOBA that General Sir Patrick made no regulatory, commercial or policy decisions specific to Herminius.
9. The MOD stated that General Sir Patrick did not have contact with Herminius during his time in service and confirmed that it does not have a relationship with Herminius or other business intelligence companies.
10. The MOD stated that General Sir Patrick did not have access to information specific to Herminius, but he would have had insight at the highest levels on the areas for which he held responsibility.
11. The MOD also recognised that General Sir Patrick would have contacts across the top of UK defence which could be beneficial to any organisation, including Herminius. Additionally, the MOD said that as Chief of the General Staff, General Sir Patrick will have acquired a range of contacts in foreign governments and external organisations, which could give Herminius a disproportionate advantage in developing its business.
12. The department recommended that further to the standard conditions, General Sir Patrick'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
  - lobbying external contacts for the purposes of business development.