

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Greg Hands, former Minister of State for Trade Policy, Department for Business and Trade. Paid appointment with the EP Group a.s.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as a Strategy Adviser at EP Group a.s. (EP Group).
2. The purpose of the Rules is to protect the integrity of the government. The Committee¹ has considered the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer EP Group, as a former minister. 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 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.

¹ This application for advice was considered by Sarah de Gay; Isabel Doverty; Hedley Finn OBE; Michael Prescott; and The Baroness Thornton. Dawid Konotey-Ahulu DL was unavailable.

The Committee's consideration of the risks presented

5. EP Group is a Czech Republic-based company with a focus on investments in the energy sector across Europe – from generation and transmission to storage and distribution. In April 2025, the company completed the acquisition of Royal Mail's parent company, International Distribution Services Plc (IDS), which includes 27 legally binding undertakings with the Department for Business and Trade (DBT). You intend to take on a role as a Strategy Adviser, predominantly for the UK and Germany, with your responsibilities including: the company's public affairs in these regions, business relations with external stakeholders, monitoring and predicting policy and regulatory developments and advising the board on public affairs policy.
6. DBT maintains an ongoing relationship with EP Group in supporting potential UK investments through its Office for Investment, which serves as EP Group's primary point of contact. Further, EP Group recently completed the acquisition of Royal Mail's parent company, IDS. DBT confirmed work on the acquisition post-dates your time as a minister. Further, you made no policy, regulatory or commercial decisions specific to EP Group while Minister of State for Trade Policy. Therefore, the Committee considers the risk this appointment reasonably be perceived as a reward for decisions made, or actions taken in office, is low.
7. EP Group is a major investor in the UK, and therefore there is a general overlap between your responsibilities in office and the company's work. You also had access to trade policy information as the responsible minister. However, DBT confirmed you did not have access to specific information concerning EP Group or its competitors that would provide the company with an unfair commercial advantage. Additionally, any general sensitive trade policy information from your tenure is likely outdated given the passage of time and the movement in trade policy in that time. It is significant that you had no access to information specific to EP Group's acquisition of IDS and the contractual/regulatory relationship that now exists between EP Group and DBT – which commenced after you left office in July 2024.
8. Your proposed role with EP Group involves public affairs for both the UK and Germany. This could be seen to contradict the lobbying ban that applies to all former ministers for two years on leaving office – that your role might include lobbying the UK government on behalf of its clients. This raises a reasonable concern that you may be seen to offer EP Group and its clients unfair access to and influence within government. EP Group now not only receives general support from DBT, but also has contractual/regulatory responsibilities to DBT, following its acquisition of IDS. Therefore, the Committee considered it would be difficult to mitigate the risk you will be seen to offer unfair influence if you

were to have any contact with the UK government on behalf of EP Group. It is also significant that EP Group confirmed your role will be separated from any lobbying of the UK government.

9. As the role involves business development there is a risk you might be seen to draw on contacts made during your time as Minister for Trade Policy (in foreign governments and other external organisations) to gain business/investment.

The Committee's advice

10. The Committee considers the main risk here is a reasonable concern that you may offer EP Group unfair access to, and influence within, government, given the focus of the role on public affairs. Therefore, the Committee's advice is that you should have no direct engagement with the UK government on behalf of EP Group.
11. The conditions below are sufficient to mitigate the remaining risks related to this role in terms of your access to information and influence. These seek to prevent you from making use of privileged information, contacts and/or influence gained from your time in ministerial office to the unfair advantage of EP Group.
12. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **EP Group a.s.** be subject to the following conditions:
 - 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 UK government or any of its arm's length bodies on behalf of EP Group a.s. (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 EP Group a.s. (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office, you should not provide advice to EP Group a.s. (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;

- for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you have developed during your time in office and in other governments and organisations for the purpose of securing business for any company or organisation (including parent companies, subsidiaries and partners); and
 - for two years from your last day in ministerial office you should not have any engagement on behalf of EP Group a.s. (including parent companies, subsidiaries, partners, clients and members) with the UK government.
13. 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' Interests². 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. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so. Please also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.

² 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.

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.

Isabel Doverty

Interim Chair
ACOPA

Annex - Material Information

The role

1. EP Group a.s. (Energetický a průmyslový holding, a.s. in Czech) is a Czech Republic (Prague) based company currently investing mainly in the energy sector in Europe, founded in 2009. The group's business lines cover the complete value chain ranging from highly efficient cogeneration, power generation, natural gas transmission, gas storage, gas and electricity distribution and supply.
2. You wish to take up a paid, full-time role as a Strategy Adviser, UK & Germany with EP Group. The role responsibilities involve:
 - the public affairs of the company predominantly in UK and Germany, including business relations with the relevant outside stakeholders;
 - monitoring and prediction of developments in the policy, regulatory and legislative frameworks influencing the business of the company;
 - preparing and proposing to the Board of Directors of the company, and implementing the public affairs policy of the company in accordance with the instructions and guidelines by the Board of Directors; and
 - review of public affairs agenda identifying areas for improvement, efficiencies exploitation/optimisation, including risks and opportunities for the businesses of the company.
3. You will be located in London, Prague, and Dusseldorf.
4. You stated the role will not involve direct contact with government.
5. You approached the company's CEO after the UK election, who you knew before you were a minister.
6. You stated the reason for your suitability for this role is not principally based on your being a former minister but you being fluent in German and knowledgeable of the key sectors in Germany with which the company

engages – energy, logistics, and retail. You can also speak Czech, having studied it at university.

7. You confirmed that you will ensure you observe the Committee's restrictions in relation to your public affairs work.

Dealings in office

8. You met the CEO of EP Group at the Department of Business and Trade in January 2023. You said this was a general meeting in relation to the CEO's role as a major investor in the UK.

Correspondence with EP Group

9. EP Group confirmed in writing its understanding of, and agreement to, comply with the Committee's advice – stating that, in particular:
 - a. your role will involve no lobbying of the UK government; and
 - b. it will help ensure that the conditions imposed in this advice are met and complied with.

Departmental assessment

10. DBT noted you had contact with EP Group in your role as a trade minister, given its active investments in the UK and interest in further such investment opportunities.
11. DBT has an ongoing relationship with EP Group in supporting any further potential investments into the UK – the Office for Investment, a joint unit between the Department for Business and Trade and the Treasury that helps secure high-value foreign direct investment into the UK, is their primary point of contact. The Royal Mail Acquisition: the department said that should the EP Group takeover of Royal Mail's parent company go through, EP Group has committed to 27 legally binding undertakings that it will be required to comply with and provide DBT with ongoing compliance monitoring information.
12. The department recognised that whilst the deed of undertaking in respect of the Royal Mail parent company's, International Distribution Services Plc (IDS). acquisition was negotiated with EP Group solely after you left office and when you were no longer a minister, there may be some perceived conflicts were you to represent EP Group in any discussions with DBT on compliance with the Deed in future.
13. DBT recommended standard conditions with the addition of a condition that prevents you from involvement in discussions with government about

compliance – to mitigate the potential risk around undue influence.