



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

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**BUSINESS APPOINTMENT APPLICATION: Damian Parmenter CBE, former Director General, AUKUS, Ministry of Defence. Paid appointment with Palantir Technologies UK, Ltd.**

1. Mr Parmenter 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 proposed role with Palantir Technologies UK, Ltd (Palantir) as a Senior Counsellor.
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 Mr Parmenter made during his time in office, alongside the information and influence he may offer Palantir Technologies Limited. 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.

The Committee's consideration of the risks presented

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<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.

5. Palantir is an American technology company that specialises in big data analytics. Palantir has had a commercial relationship with the UK government, including the Ministry of Defence (MOD), for a number of years, providing various software/data tools.
6. There is a general overlap between Palantir's work and defence and security and Mr Parmenter's work at the MOD. Mr Parmenter's official dealings with Palantir representatives in office were limited to information sharing:
  - Palantir attended wider stakeholder events delivered by him as part of his outreach activity as Director General for AUKUS<sup>2</sup>.
  - in his previous capacity as Director General of Delivery and Strategy, Mr Parmenter visited Palantir to understand its work supporting Ukraine.
7. Further, Palantir's contracted work with the MOD sits entirely separate to his previous role in government service and he was not involved in policy, regulatory nor commercial decisions specific to Palantir. The Committee considered that the risk this appointment could reasonably be perceived as a reward for decisions made, or actions taken in office, is low.
8. As a company that operates within the defence and security sector and has contractual relationships with the MOD, there is a risk associated with Mr Parmenter's access to information that may provide an unfair advantage to Palantir. There are several factors that help to reduce the likelihood his access to information could offer an unfair advantage to the company:
  - as Director General of AUKUS, Mr Parmenter made no contractual and/or programme decisions - and was not involved in setting capability requirements of the MOD or AUKUS. Mr Parmenter was instead responsible for delivering pre-agreed departmental strategy and was not involved in setting capability requirements to the MOD or AUKUS.
  - the MOD is not aware of any specific information that Mr Parmenter had access to that could provide Palantir with an unfair advantage.
  - the MOD stated that Mr Parmenter has not had access to board papers or had any involvement with the department's boards or committees since leaving his role as Director General of Delivery and Strategy prior to his role with AUKUS.
  - Mr Parmenter stepped back from his role as Director General of AUKUS on 1 February. Since then Mr Parmenter has provided mentoring/coaching support to a number of Civil Servants and contributed a personal paper on the role of the Civil Service in Defence,

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<sup>2</sup> (AUKUS is a trilateral security and defence partnership between Australia, the UK and the US).

to the Permanent Secretary. During this period, Mr Parmenter has not had access to privileged or sensitive defence/government information.

- Mr Parmenter's proposed role with Palantir is focused on international markets and not the UK.
9. There remains a limited risk that Mr Parmenter could grant Palantir an unfair advantage through general access to information. For example, the MOD noted he may have acquired, by virtue of the seniority of his roles, in relation to future strategy, capability requirements and resource constraints.
  10. Mr Parmenter said his role with Palantir would be focused on international markets and would involve no contact with the MOD. Whilst this limits the risk, given Mr Parmenter's seniority and the contracts and influence he may be seen to confer to Palantir - the Committee asked Palantir to confirm Mr Parmenter's role would be separate to its work in UK defence.
  11. The Committee considered it is likely that Mr Parmenter would have amassed a network of contacts while in office especially in the US and Australia by virtue of his role at AUKUS. As such, there is a risk these contacts gained in office, but outside of the UK government may be seen to offer new business development opportunities for Palantir only gained by virtue of his position representing the UK on AUKUS matters.

#### The Committee's advice

12. The Committee considered that Mr Parmenter's role within the MOD presents real and perceived risks. The Committee recognised the MOD's view that; though his general high level access to information was a risk, his ability to offer an unfair advantage to Palantir through any specific piece(s) of information was limited. To mitigate the risk, the Committee considered that the role should be limited to that he describes, and therefore he must not advise on the defence sector in the UK.
13. Palantir has a significant commercial interest in the UK government. Because of this, the Committee's advice is that Mr Parmenter must have no direct engagement with government on behalf of the company, as to do so would raise significant risks under the government's Rules.
14. The remaining conditions below seek to mitigate the remaining risks associated with his access to information, contacts, and influence from his time in government service.
15. It is significant that Palantir confirmed its adherence with the Committee's advice and, in particular, that Mr Parmenter would not be involved in any lobbying of the UK government.

16. The Committee advises, under the government's Business Appointment Rules, that Mr Parmenter's role with **Palantir Technologies UK, Ltd** 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 or its arm's length bodies on behalf of Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to Palantir Technologies UK, Ltd (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 office, he should not become personally involved in lobbying contacts he has developed during his time in office and in other governments and organisations for the purpose of securing business for Palantir Technologies UK, Ltd (including parent companies, subsidiaries and partners);
- for two years from his last day in Crown service, he should not advise Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients) on any matters relating to the whole of the UK defence sector/industry; and
- for two years from his last day in Crown service he must not directly engage with the UK government or its arm's length bodies on behalf of Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients).

17. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's 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.

18. 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.
19. 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*'.
20. Mr Parmenter must inform us as soon as he takes up employment with this organisation, or if it is announced that he will do so. 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.
21. 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,  
Dominic Kelly  
**Committee Secretariat**

## **Annex - Material information**

### The Role

1. Palantir is an American company that specialises in big data analytics. It has four main platforms: AIP, Foundry, Gotham and Apollo.
2. Palantir's original customer base was federal agencies of the United States Intelligence Community (USIC). Palantir has since expanded its customer base internationally to include state governments and private companies. The

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<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 obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or in the case of peers.

company has had a relationship with the MOD for a number of years, with the use of Palantir software mature within many of its delivery organisations. Most notably the MOD agreed a contract with Palantir at the end of 2022 to analyse its intelligence data.

3. Mr Parmenter seeks to join Palantir as a Senior Counsellor. He described this role as a senior advisory role that includes providing 'decision support' to the UK Head of Palantir on international defence and security issues and focussed on international opportunities within Europe and the Indo-Pacific.

#### Correspondence with Palantir on compliance

4. Palantir confirmed in writing its agreement to comply with the Committee's advice, stating that:
  - *'Palantir is confident that Mr Parmenter's anticipated role as a consultant and the comprehensive Palantir Compliance Program in place will enable him to comply with all conditions imposed by ACOBA and all applicable Business Appointment Rules.*
  - *Palantir will ensure that it does not ask Mr Parmenter to undertake any activity that might be a breach of any of his restrictions or conditions.*
  - *Palantir will ensure that Mr Parmenter knows these conditions will apply for two years from his last day in paid Crown service.*
5. Palantir confirmed the Committee's advice will be complied with via the company's internal compliance processes:
  - a. *'As part of his new employee onboarding, Palantir will provide Mr. Parmenter with an individual compliance training session where a lawyer on Palantir's Compliance Team will specifically go over his restrictions and conditions, including that he will be restricted from providing advice on the defence sector in the UK (which includes lobbying or other engagement with the UK government on Palantir's behalf).*
  - b. *During this individual compliance training session, Mr. Parmenter will also be provided with specific information about the Palantir work or activities that he will be recused from based on the ACOBA restrictions and conditions.*
  - c. *Immediately after the training, Palantir's Compliance Team will also provide him a written summary of his restrictions and conditions.*
  - d. *Palantir employees who will most regularly work with Mr. Parmenter, including his immediate supervisor, will be informed of his restrictions and conditions.*

- e. *Lawyers on Palantir's Compliance Team will also be aware of Mr. Parmenter restrictions and conditions and will be available to assist Mr. Parmenter with these requirements as needed.'*

#### Dealings in office

6. Mr Parmenter had occasional contact with Palantir whilst in office. As Director General at AUKUS he met with them to gain private sector insight into attracting private sector investment capital into AUKUS programmes. Palantir representatives also attended events delivered by Mr Parmenter as part of AUKUS outreach activity. In his previous role as Director General for Delivery Strategy, Mr Parmenter was briefed by Palantir on specific work supporting Ukraine (on developing AI in warfare).
7. Mr Parmenter said that he made no decisions specific to Palantir and that in his role at AUKUS he was not responsible for programmes or specific policy/operations. He said that his main responsibility in this role was to communicate and deliver pre-determined departmental policy.

#### Departmental Assessment

8. The MOD confirmed the details provided in Mr Parmenter's application, including that:
- a) Mr Parmenter made no commercial or policy decisions specific to Palantir.
  - b) Mr Parmenter does not have access to specific pieces of contractual or commercial privileged information relating to Palantir.
9. The MOD said Mr Parmenter may have knowledge of capability requirements and future strategy which could provide Palantir with an unfair advantage. This is derived from Mr Parmenter's seniority and extensive experience working at the MOD rather than his access to specific privileged information relevant to Palantir or competitors.
10. The MOD recommended standard conditions plus a limitation to prevent him from using his contacts that he has developed in overseas governments to secure business for Palantir.