



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Robert Courts KC, former Solicitor General at the Attorney General's Office. Paid appointment with Farnborough International Limited.

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 Non-Executive Director (NED) with Farnborough International Limited (Farnborough).
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 taken during your time in office, alongside the information and influence you may offer Farnborough, 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.

The Committee's consideration of the risks presented

5. Farnborough is an airshow. The company is looking to expand, to make it a globally recognised brand in relation to delivering both airshows and hosting business events. As a NED, you said that your role will be to provide business advice on governance, strategy, finance, crisis management, sponsorship, leadership and performance monitoring.
6. You did not meet with, nor did you make any policy, regulatory or commercial decisions specific to Farnborough in office; and there is no departmental relationship between the Attorney General's Office (AGO) and Farnborough. Therefore, the Committee¹ considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.
7. As a minister it is likely that you had access to a range of information that could benefit any organisation. The AGO noted that as the former Solicitor General, you would have had access to legally privileged information and insight that could offer any company an advantage. The Committee considered the risks limited in this case because:
 - you are subject to the Law Officer's Convention – any information you may possess is subject to legal professional privilege, and neither the existence nor content of any Law Officers' advice should be disclosed outside government without the Law Officers' explicit consent;
 - there is no discernible overlap with your most recent ministerial role as Solicitor General and your role at Farnborough; and
 - it has been a year since you left office – providing a gap that reduces the currency of any information you possess.
8. As with any former minister, there are risks associated with your contacts and influence within government – with the potential for Farnborough to gain unfair access or influence as a result. You confirmed that your role will not involve any contact with, or lobbying of, the government.
9. Your role involves leveraging your personal and professional networks to obtain sponsorship for Farnborough. There is a risk that you may be seen to call on your contacts in the private sector, gained as a result of your recent time in government service, to unfairly advantage the business development and fundraising of Farnborough.

The Committee's advice

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

10. The Committee determined that this case does not raise any particular propriety concerns. The risks identified can be appropriately mitigated by the conditions below, which seek to prevent you from making use of privileged information, contacts and influence gained from your recent time in ministerial office to the unfair advantage of Farnborough.

11. The Committee advises, under the government's Business Appointment Rules, that your appointment with **Farnborough International Limited** 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 service;
- for two years from your last day in ministerial service, you should not become personally involved in lobbying government or any of its arm's length bodies on behalf of Farnborough International Limited (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Farnborough International Limited (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial service, you should not provide advice to Farnborough International Limited (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 and its arm's length bodies; and
- for two years from your last day in ministerial service, you should not become personally involved in lobbying contacts you developed during your time in office in other governments and organisations for the purpose of securing business and/or sponsorship opportunities for Farnborough International Limited.

12. 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.² It is an applicant's personal responsibility to

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 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.

understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

13. 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.
14. 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.*"
15. 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, it may be necessary for you to make a fresh application.
16. 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. Farnborough is one of the world's biggest and most prestigious airshows. You said that the company is trying to expand its offering, to make it a globally recognised brand in relation to delivering both airshows and hosting business events. Farnborough is a subsidiary of ADS Group, which is a UK-based trade association for aerospace, security, defence and space.
2. You propose to take up a paid, part-time role as a Non-Executive Director. You said that your role would not involve any contact with, or lobbying of the government. You provided a list of your responsibilities:

Governance & Compliance

- Ensure the organisation operates within its legal and regulatory framework
- Monitor ethical standards and help maintain corporate integrity
- Support risk management, particularly around event safety, licensing, and insurance

Strategic Oversight

Contribute to shaping the long-term strategy, including:

- Market positioning
- Audience development
- Partnerships and sponsorships
- Challenge and support the executive team in delivering key strategic objectives

Financial Stewardship

Review and provide independent judgment on:

- Budgets
- Revenue streams (ticket sales, sponsorships, merchandising, etc.)
- Cost control and profitability of events
- Ensure sustainable growth and financial accountability

Risk and Crisis Management

- Provide oversight of health and safety, reputational risk, and contingency planning for events
- (e.g. weather disruption, crowd control issues, PR fallout)
- Contribute to crisis response plans and learnings post-events

Leadership Support & Performance Monitoring

- Hold the CEO and senior team accountable, offering constructive

feedback

- Appraise executive performance and contribute to succession planning

Networking and Advocacy

Leverage personal and professional networks to:

- Promote the organisation
 - Open doors to sponsors, partners, or high-pro Farnborough collaborators
 - Act as a brand ambassador where appropriate
3. You said that you have a long-standing interest in aviation, and previously held the role of Parliamentary Under Secretary of State: Aviation, Maritime and Security (Maritime Minister) at the Department for Transport between 8 September 2020 and 20 September 2022.

Dealings in office

4. You gave the Committee the following information about your role as Solicitor General:
- you did not make any policy, regulatory, or commercial decisions that impacted Farnborough;
 - you did not meet with Farnborough;
 - you had no access to sensitive information that could grant Farnborough or its clients an unfair advantage; and
 - you anticipate no overlap between the advice you will provide and your ministerial responsibilities.

Departmental assessment

5. The AGO confirmed you were not involved in any regulatory or policy decisions that impacted Farnborough and said that there is no departmental relationship with the company.
6. The AGO stated you had access to sensitive and legally privileged information, including Law Officers' Advice, which, if disclosed, could be considered to offer an unfair insight/advantage to Farnborough.
7. The AGO recommended the standard conditions. It also noted:

'In addition to legal privilege, Law Officers' advice is subject to the Law Officers' Convention, which provides that neither the existence nor content of any Law Officers' advice should be disclosed outside government without the Law Officers' explicit consent.'