



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

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**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Rishi Sunak MP, former Prime Minister of the United Kingdom. Paid appointment with Anthropic Public Benefit Corporation (PBC).**

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 an appointment as a Senior Advisor with Anthropic PBC (Anthropic).
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 Anthropic, as the former Prime Minister. The material information taken into consideration by the Committee is set out in the annex below.
3. The Committee's<sup>1</sup> advice is not an endorsement of the appointment. The advice imposes a number of conditions to mitigate the potential risks to the government associated with this appointment under the Rules – including a limitation to the role.
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.

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

## The Committee's consideration of the risks presented

### **Context**

5. Anthropic is a US-based Artificial Intelligence (AI) company founded in 2021. It has developed a family of large language models which have applicability in various sectors.
6. Anthropic is a stakeholder of the UK government as a key AI company operating in the UK. In February 2025, the UK government (led by the Department for Science, Innovation and Technology – DSIT) signed a memorandum of understanding with Anthropic on exploring AI opportunities<sup>2</sup> and how AI can transform UK public services<sup>3</sup>. More recently, in July 2025, DSIT launched a partnership with a number of organisations, including Anthropic, to focus on research in safeguarding AI development.<sup>4</sup>

### **The risks associated with your official dealings with the sector**

7. As Prime Minister, you were responsible for leading government's policy and decisions, and for overseeing all ministers, the Civil Service and government agencies. Whilst you were not, and could not be, involved in all detail, you were accountable for government decision-making. The Committee agreed with the Cabinet Office that there were numerous decisions you made impacting on the technology and AI sectors, alongside others.
8. During your time as Prime Minister, AI was a significant priority. You were the driving force behind the AI Safety Summit held in November 2023<sup>5</sup> which resulted in a series of commitments focused on international cooperation, safety governance and risk management for AI. You also announced the launch of the UK's AI Safety Institute<sup>6</sup> and introduced the Digital Markets, Competition and Consumers Acts 2024 which impacts on companies operating in the AI sector.
9. Your personal dealings with the company were limited. You met with Anthropic once as part of a roundtable discussion<sup>7</sup> and may have come across the company at other large scale business/technology events such as the AI Safety Summit and the Global Investor Summit. There is no suggestion any decisions or actions were taken in office in expectation of this role, and the Cabinet Office confirmed it is not aware of any decisions you made that were

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<sup>2</sup> [Anthropic signs MOU with UK Government to explore how AI can transform UK public services](#)

<sup>3</sup> [Memorandum of Understanding between UK and Anthropic on AI opportunities - GOV.UK](#)

<sup>4</sup> [AI Security Institute launches international coalition to safeguard AI development - GOV.UK](#)

<sup>5</sup> [AI Safety Summit 2023 - GOV.UK](#)

<sup>6</sup> [Prime Minister launches new AI Safety Institute - GOV.UK](#)

<sup>7</sup> [PM meeting with leading CEOs in AI: 24 May 2023 - GOV.UK](#)

specific to Anthropic, as opposed to sector wide. The Committee therefore does not consider this role could reasonably be seen as a reward for actions or decisions taken during your time as Prime Minister.

10. Nonetheless, your proximity to the sector is relevant to the Committee's consideration, including that you led the government when AI was a significant global issue and introduced initiatives and policies that could be seen as beneficial to a company such as Anthropic, directly or indirectly.

### **The risks associated with your access to information and your potential to offer unfair access to the company**

11. This role is likely to have a broad overlap with your access to information in office – a risk that would likely arise with almost any outside role. As the former Prime Minister, you will have been privy to a range of high-level sensitive information on more or less all government-related matters. Further, during your time in office, you had extensive industry engagement with companies and organisations within the AI and tech sector.
12. There are factors which reduce the risks associated with your access to information both broadly and specifically related to the AI and technology sectors. Since you left office, there has been a change in government and a significant shift in the economic and geopolitical climate that no doubt has affected AI, a rapidly evolving area. It has now been 14 months since you last had access to information, creating a gap between you having access to privileged insight in office and taking up this role – reducing the likely currency of relevant information. Further, the Cabinet Office is not aware of any specific information from your time as Prime Minister that would now offer Anthropic an unfair advantage. However, it is hard to demonstrate that all information available to you as Prime Minister on relevant matters is now obsolete. It is significant you have confirmed that your role will not include advising on specific UK policy matters.
13. Anthropic has a significant interest in UK government policy. As the former Prime Minister, there is a reasonable concern that your appointment could be seen to offer unfair access and influence within the UK government. This is heightened given the ongoing debate about how to best regulate AI, and at a time of intense debate and lobbying around the world on what the approach should be. The Committee considered that it would be impossible to mitigate the risk of perceived lobbying if you initiated contact of any kind with the UK government on behalf of Anthropic, noting that this is not your stated intention – you confirmed that the role is internally-oriented and will not involve any lobbying.

### **The Committee's advice**

14. As the former Prime Minister with overall responsibility for the UK government, your privileged position granted you power to influence decisions and unique access to high-level information.
15. The Committee recognised the risks associated with your access to information are somewhat limited due to the passage of time and political and economic changes. It also considered it likely you will be seen to have privileged insight from your dealings with the tech and AI sector as Prime Minister, albeit some months ago. Consequently, a condition has been imposed to limit your role and reduce the scope for risks under government Rules.
16. Anthropic has confirmed adherence to the Committee's advice, including that your role will be appropriately ring fenced and separated from any lobbying activity.
17. The Committee advises, under the government's Business Appointment Rules, that your appointment with **Anthropic PBC** 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 its arm's length bodies on behalf of Anthropic PBC (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly of your contacts in the government and/or ministerial contacts to influence policy, secure business funding or otherwise unfairly advantage Anthropic PBC (including parent companies, subsidiaries, partners and clients);
  - for two years from your last day in ministerial office, you should not provide advice to Anthropic PBC 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 or its arm's length bodies;
  - for two years from your last day in ministerial office, your role with Anthropic PBC should be limited to providing advice on strategy, macro-economic and geopolitical matters that do not conflict with your time as Prime Minister. This includes:
    - not advising on matters not yet in the public domain in line with the conditions above; and

- not advising on matters that are already in the public domain where it could reasonably be perceived that your role as Prime Minister, in developing or determining a policy or regulatory decision, would give rise to a conflict under the government's Business Appointment Rules
  - for two years from your last day in ministerial office, you must not initiate any engagement with the UK government or its arm's length bodies on behalf of Anthropic PBC (or parent companies, subsidiaries, partners and clients).
18. 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>8</sup> You are reminded that as a Member of Parliament you have a separate ban on paid lobbying under the Parliamentary Code of Conduct. 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.
19. 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.
20. 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."*
21. You must inform us as soon as your appointment is live or is announced. 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.

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<sup>8</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.

22. Once the appointment has been publicly announced or taken up, this advice will be published.

Isabel Doverty

**Interim Chair  
ACOPA**

## **Annex - Material Information**

### The company

1. Anthropic PBC<sup>9</sup> (Anthropic) is an American artificial intelligence (AI) company founded in 2021. It has developed a family of large language models named Claude, a competitor to OpenAI's ChatGPT and Google's Gemini. Claude has applicability in various sectors including government, where, according to its website, it helps government organisations deploy advanced AI capabilities with rigorous security controls.<sup>10</sup>
2. In February 2025, the UK government (led by the Department for Science, Innovation and Technology – DSIT) signed a memorandum of understanding with Anthropic on AI opportunities<sup>11</sup> and to explore how AI can transform/improve UK public services<sup>12</sup>. This is a non-binding collaborative partnership, which includes exploring opportunities in:
  - Improving public services to investigate how Anthropic's AI model, Claude, can enhance how people in the UK access and interact with government information and services online.
  - Advancing AI practices to establish the appropriate best practices for the responsible deployment of advanced AI in the public sector. The government emphasises principles such as privacy preservation, responsiveness to public needs, and building trust.
  - Security and research collaboration, where Anthropic works closely with the UK's AI Security Institute (formerly the AI Safety Institute) to research and evaluate AI capabilities and potential security risks.
  - Economic and workforce insights through leveraging Anthropic's

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<sup>9</sup> A Public Benefit Corporation (PBC) is a type of for-profit company that, unlike traditional corporations, explicitly specifies a public benefit purpose in its charter, alongside profit-making goals, allowing it to balance social and environmental impact with financial performance.

<sup>10</sup> <https://claude.com/solutions/government>

<sup>11</sup> [Memorandum of Understanding between UK and Anthropic on AI opportunities - GOV.UK](#)

<sup>12</sup> [www.anthropic.com/news/mou-uk-government](https://www.anthropic.com/news/mou-uk-government)

‘Economic Index’ which uses anonymised data to understand AI's effects on the economy and labour markets. This information is intended to help the UK adapt its workforce and innovation strategies for an AI-enabled future.

- Supporting the UK's AI Ecosystem through aiming to use Anthropic's tools to support the UK's startup community, universities, and other organisations to boost the innovation economy.
3. In July 2025, DSIT launched a new agreement with Anthropic, a Canadian government counterpart and Amazon amongst others in a research project to safeguard AI development.<sup>13</sup>
  4. The Competition and Markets Authority (CMA) has previously investigated two separate deals involving Anthropic: its partnership with Google (Alphabet)<sup>14</sup> and its partnership with Amazon<sup>15</sup>. Both investigations concluded that they did not qualify as a relevant merger situation under the merger provisions of the Enterprise Act 2002.

### The role

5. You described this as a paid, part-time role as a Senior Advisor to Anthropic.
6. You said you will work with the senior leadership of the company and that your role will primarily involve providing high level strategic perspectives on macro-economic and geopolitical trends and how they intersect with technology and society. You said that the role will be internally facing and is akin to operating as an internal think tank. You confirmed that you will not be advising on specific UK policy matters and that you will have no contact with the UK government.
7. You confirmed that your payment(s) from this engagement will be donated to charity, specifically The Richmond Project<sup>16</sup>. When the Committee advised on your role as a Trustee, you said you would contribute to this charity, which was set up by you and your wife. The Richmond Project is regulated by the Charity Commission.

### Previous experience in financial services

8. Before entering politics, you worked in the financial services sector for 14

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<sup>13</sup> [AI Security Institute launches international coalition to safeguard AI development - GOV.UK](#)

<sup>14</sup> [Alphabet Inc. \(Google LLC\) / Anthropic merger inquiry - GOV.UK](#)

<sup>15</sup> [Amazon / Anthropic partnership merger inquiry - GOV.UK](#)

<sup>16</sup> [ACOPA Advice Letter: Rishi Sunak, The Richmond Project - GOV.UK](#)



years, which included working with and investing in a wide range of companies in the technology space. You also stated that having completed your MBA at Stanford University, located in Silicon Valley, you gained experience in technology related matters. You noted that Anthropic contacted you after you stepped down as Leader of the Opposition. You told the Committee that rather than your time in office, it is your professional background in finance and technology, alongside your understanding of geopolitical and macroeconomic trends that makes this part-time role at Anthropic a natural fit for you, now that you are no longer in office.

#### Correspondence from Anthropic

9. Anthropic confirmed in writing its understanding of, and agreement to comply with, the Committee's advice. It confirmed the following:

- your role as Senior Advisor will be appropriately ring-fenced to focus on internal strategic advisory matters and will not involve any lobbying of the UK government;
- your responsibilities will be limited to providing advice on strategy, macro-economic and geopolitical matters that do not conflict with your time as Prime Minister;
- any engagement with UK government will be handled by other senior personnel within Anthropic, such as other members of Anthropic's policy team;
- you will not be involved in initiating any contact with UK government or its arm's length bodies on Anthropic's behalf; and
- internal procedures have been put in place to ensure full compliance with these conditions.

#### Dealings in office

10. You said that you were not aware of, or involved in, any specific regulatory or policy decisions involving Anthropic. As Prime Minister, you stated that you were involved in policies related to the technology sector given this was a core part of the government's strategy for growth and that these policies are now in the public domain. These include:

- the Data Protection and Digital Information Act (introduced in March 2023, has not received Royal Assent)<sup>17</sup>
- the AI White Paper on a pro-innovation approach to AI (March 2023)<sup>18</sup>
- the AI Safety Summit (November 2023)<sup>19</sup>

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<sup>17</sup> [Data Protection and Digital Information Bill - Parliamentary Bills - UK Parliament](#)

<sup>18</sup> [Policy Paper: A pro-innovation approach to AI - GOV.UK](#)

<sup>19</sup> [AI Safety Summit 2023](#)



- the UK's AI Safety Institute (November 2023)<sup>20</sup>
- the Digital Markets, Competition and Consumers Act 2024 (received Royal Assent in May 2024)<sup>21</sup>

11. You noted that you would meet leading figures in the AI and technology sector regularly given the importance of the industry to the UK. You confirmed that you had no one-to-one meetings with Anthropic during your time as Prime Minister. In May 2023 as part of a roundtable event you met leading business people in the AI sector which included Dario Amodei – the CEO of Anthropic.<sup>22</sup> You stated that Anthropic were present alongside other businesses in large scale business and technology events where you could have had contact with them.<sup>23</sup>

12. You told the Committee that there is a clear distinction between your time in office (as Chancellor, now three years ago, and 14 months ago as Prime Minister) and the landscape now. In particular, you said that since the election, the new government has announced new policy in the AI and technology sector including:

- Cyber Security and Resilience Bill (September 2024)<sup>24</sup>
- The AI Opportunities Action Plan (January 2025)<sup>25</sup>
- Changes to the AI Safety Institute - renamed AI Security Institute (February 2025)<sup>26</sup>

### Departmental assessment

13. The Cabinet Office confirmed that you made no decisions specific to Anthropic and did not meet with the company on a one-to-one basis. It also provided the following context:

- as Prime Minister, you had oversight of all government business;
- some government business you were involved in and accountable for would have had an impact on the AI and technology sector in which Anthropic operates;
- you met representatives of the company and several other leading business people in the AI and technology sector in meetings, roundtables and various other large-scale business events;
- agreements made between Anthropic and the government took place

<sup>20</sup> [Prime Minister launches - GOV.UK new AI Safety Institute](#)

<sup>21</sup> [Digital Markets, Competition and Consumers Act 2024 - Parliamentary Bills - UK Parliament](#)

<sup>22</sup> [PM meeting with leading CEOs in AI: 24 May 2023 - GOV.UK](#)

<sup>23</sup> [Business Connect Event, AI Safety Summit, and the Global Investor Summit](#)

<sup>24</sup> [Cyber Security and Resilience Bill - GOV.UK](#)

<sup>25</sup> [AI Opportunities Action Plan - GOV.UK](#)

<sup>26</sup> [Tackling AI security risks to unleash growth and deliver Plan for Change - GOV.UK](#)

after you left office;<sup>27</sup> and

- as a former Prime Minister, you were privy to a wide range of information – however, given the change in political leadership and the length of time since you were in office, this knowledge will have changed in terms of salience and currency.

14. The Cabinet Office considered that any risks associated with this appointment could be appropriately mitigated by standard conditions and a ban on advising on matters you were involved in as Prime Minister that have not been determined or have not yet been made public; clients/investors whom you had material dealings with; and through preventing you from initiating any engagement with government.

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<sup>27</sup> [Memorandum of Understanding between UK and Anthropic on AI opportunities - GOV.UK](#) and [AI Security Institute launches international coalition to safeguard AI development - GOV.UK](#)