



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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By email

October 2025

Dear Mr Johnson

In my last correspondence, of 26 September 2025, I asked if you would correct the record in respect of the allegations in the media that you had breached the government's Business Appointment Rules.

It was alleged that you began working with Better Earth and/or BIA Advisory before receiving ACOBA's advice and that you made introductions to foreign government representatives on behalf of these companies.

As a former Prime Minister, you held the highest role in public office as the head of His Majesty's Government and were responsible for both the Ministerial Code and the Business Appointments Rules. Regardless of how these allegations emerged, it is not unreasonable to expect you would take this opportunity to dispel suggestions you failed to comply with obligations intended to protect the integrity of government. It is highly disappointing that you did not.

Your failure to answer specific questions and provide a factual denial of these allegations suggests there has been a breach of the Rules.

In line with the Committee's policy of transparency, we will be publishing our correspondence with you on this matter and reporting this breach to the government, as the owners of the Rules.



Isabel Doverty
Interim Chair
Advisory Committee on Business Appointments

Enc: email correspondence on this matter

Copied to: The Rt Hon Darren Jones MP, Chief Secretary to the Prime Minister,
Chancellor of the Duchy of Lancaster and Minister for Intergovernmental Relations;
The Rt Hon Nick Thomas-Symonds MP, Minister for the Cabinet Office;
Simon Madden, Director of Propriety & Ethics, Cabinet Office.

By email

26 September 2025

Dear Mr Johnson

Thank you for your response of 22 September, particularly for confirming you did not start work with Better Earth, in the role you sought advice on, until you had received advice from ACOBA and then you registered the role with Companies House.

I previously acknowledged your concerns about how information had made its way into the public domain.

My correspondence was set out to offer you every opportunity to correct the record and confirm you did not, as it has been publicly suggested:

- seek to make introductions/discuss work on behalf of Better Earth and/or BIA Advisory with foreign government representatives; and
- enter into any kind of contract or carry out any work with Better Earth and/or BIA Advisory without first receiving ACOBA's advice.

As a former Prime Minister, there is a reasonable expectation that you would respond fully and factually to my questions to dispel the suggestion that you acted in a manner contrary to your obligations under the Rules.

If you wish to take the opportunity to do so, please respond by close of business Friday 3 October 2025. Otherwise, ACOBA will consider your failure to provide

answers as evidence of non compliance with the government Business Appointment Rules.

In line with the Committee's policy of transparency, we will publish correspondence on this matter in due course. Any failure to respond, will be included in the publication. ACOBA reports all breaches to the government, as the owners of the Rules.



Isabel Doverty
Interim Chair
Advisory Committee on Business Appointments

By email

22 September 2025

Dear Ms Doverty,

Thanks so much for your latest questions. I repeat that it is wrong in principle for ACOBA to be legitimating and encouraging the hacking of ex-ministers' emails or data in any way. Nor do I believe that you should give any credence to the subsequent reporting.

But you are of course right to want reassurances on the rules so I am happy to confirm that:-

1. I did not start work for Better Earth until after I had received advice from ACOBA. That advice finally came almost two years after I had ceased to be PM. You can see this not just from your own records but also from Companies House. Had ACOBA's advice been negative I would of course not have proceeded.
2. As for BIA I again sought ACOBA advice but the idea was not proceeded with, and no such company was ever set up.

Yours sincerely,

RT HON BORIS JOHNSON

By email

17 September 2025

Dear Mr Johnson

Thank you for your prompt response to my earlier correspondence about Better Earth and Bia Advisory. I note your concern about how the material behind the press coverage was obtained and your assurance to ACOBA that rules have been followed.

ACOPA is concerned with protecting the integrity of government in so far as it relates to outside appointments and the Business Appointment Rules. It is ACOBA's duty to investigate any reasonable suspicion of impropriety under these rules.

I would therefore be grateful for answers to the following specific questions, in order to provide assurance of your compliance with government's Business Appointment Rules:

1. On which date did you sign your contract to work with Better Earth?
2. Did you mention Better Earth during any meetings and/or correspondence with Mohammed bin Salman Al Saud, Crown Prince of the Kingdom of Saudi Arabia and/or Majid bin Abdullah Al-Qasabi, Minister of Commerce for the Kingdom of Saudi Arabia?
3. Did you have any meetings with Bia Advisory while you were subject to the government's Business Appointment Rules – between 7 September 2022 and 6 September 2024?
4. If you signed a contract with Bia Advisory, when did you sign this contract or start working with Bia Advisory?
5. Did you mention Bia Advisory during any meetings or correspondence with Khaldoon al-Mubarak and/or any other representatives of Abu Dhabi's investment fund while you were subject to the government's Business Appointment Rules?

I ask that you please respond to questions 1-5 above and provide any other information ACOBA should be aware of by close of business on Wednesday 24 September 2025.

In line with the Committee's policy of transparency, we will publish correspondence on this matter in due course. Any failure to respond, will be included in the publication. ACOBA reports all breaches to the government, as the owners of the Rules.

A handwritten signature in dark ink that reads "Isabel Doverty". The signature is written in a cursive, flowing style with a large loop at the end of the last name.

Isabel Doverty
Interim Chair
Advisory Committee on Business Appointments

By email

15 September 2025

Dear Ms Doverty,

Many thanks for drawing my attention to these reports.

The stories to which you refer seem to have been based on material illegally hacked by a hostile state actor.

That may explain why they contain so many assertions that are either false or misleading.

It is plainly wrong in principle to respond to stories generated in this way since any such response will be taken to legitimate and encourage further illegal activity.

The committee may rest assured that ACOBA rules were followed at all times.

Yours sincerely,

RT HON BORIS JOHNSON

By email

12 September 2025

Dear Mr Johnson

I am writing to you in my capacity as Interim Chair of the Advisory Committee on Business Appointments (ACOPA). I am writing to seek clarification regarding media reports¹ that claim you:

1. were representing and working for Better Earth in February 2024 having signed a contract in January 2024; and
2. were representing Bia Advisory in April 2024.

I would therefore be grateful for a comprehensive explanation in respect of the following:

1. Your relationship with Better Earth in advance of your application for advice in February 2024 (you received advice from ACOPA in April 2024 and your office confirmed your start date as 1 May 2024). In doing so, you must include details of:
 - a. Meetings, discussions and correspondence with Mohammed bin Salman Al Saud, Crown Prince of the Kingdom of Saudi Arabia and Majid bin Abdullah Al-Qasbi, Minister of Commerce of the Kingdom of Saudi Arabia where Better Earth was discussed.
 - b. Meetings, discussions and correspondence with any other representatives of foreign governments where Better Earth was discussed.
2. Your relationship with Bia Advisory while you were subject to the government's Business Appointment Rules (between 7 September 2022 and 6 September 2024). In doing so, you must include details of:

1

<https://www.theguardian.com/uk-news/2025/sep/09/boris-johnson-under-pressure-to-explain-how-private-office-follows-funding-rules>;
<https://www.theguardian.com/uk-news/2025/sep/09/boris-johnson-secretly-lobbied-uae-business-venture-leak-suggests>; and
<https://www.theguardian.com/uk-news/2025/sep/08/boris-johnson-sought-business-with-saudi-officials-better-earth>

- a. Meetings, discussions and correspondence with Khaldoon al-Mubarak and any other representatives of Abu Dhabi's investment fund, Mubadala where Bia Advisory was discussed.

ACOPA has already published correspondence with you regarding your previous breach of the Rules in respect of your dealings with President Nicolás Maduro, organised by Merlyn Advisors, a hedge fund management company.

I note that you failed to engage appropriately with ACOPA's previous investigation into your dealings with, and on behalf of Merlyn Advisors. I therefore remind you, as a former Prime Minister, of your obligation to respond openly and honestly to this request for information. I ask that you please respond by close of business on Friday 20 September 2025.

In line with the Committee's policy of transparency, we will publish correspondence on this matter in due course. Any failure to respond, will be included in the publication. ACOPA reports all breaches to the government, as owners of the Rules.

A handwritten signature in dark ink, reading "Isabel Doherty". The signature is written in a cursive, flowing style with a large loop at the end of the last name.

Isabel Doherty
Interim Chair
Advisory Committee on Business Appointments