



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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September 2025

BUSINESS APPOINTMENT APPLICATION: The Earl of Minto, former Minister of State at the Ministry of Defence and, prior to that, Minister of State at the Department for Business and Trade. Paid appointment with Argyll Strategy Ltd.

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 Chairman with Argyll Strategy Ltd (Argyll Strategy).
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 Argyll Strategy. 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. Argyll Strategy is an intelligence and strategic communications company, operating across a range of sectors. The Ministry of Defence (MOD) and the Department for Business and Trade (DBT) confirmed that you did not meet with Argyll Strategy, nor were you involved in decisions specific to the company. The

Committee¹ considered the risk that you could reasonably be perceived to have been offered this role as a reward for decisions or actions taken in post to be low.

6. It is likely that you had access to a broad range of sensitive information from your time in office, that may provide any company with an unfair advantage, including Argyll Strategy. The MOD and DBT confirmed that they were not concerned about any specific information you had access to and did not consider you to offer an unfair advantage to the company in that regard. This is a general risk rather than specific to your proposed role or the employer. Further, you have been out of office for over 13 months, putting a gap between when you last had access to information and taking up this role. This reduces the likelihood any information held is sufficiently up to date to offer an unfair advantage. However, as Argyll Strategy provides advisory services to a range of clients that are unknown, there is a risk, albeit limited, that you could be asked to advise the company and/or its clients on an area that overlaps with your most recent roles in government service.
7. As Argyll Strategy is an advisory company providing a government relations services to clients, there is a reasonable risk that your role may be seen to be lobbying on the company's, or its clients', behalf - which all former ministers are prevented from doing for two years on leaving office under the Rules. It is significant that you said that your role will not involve lobbying or contact with government more generally - and this has been confirmed by Argyll Strategy.
8. Your role involves attending and supporting business development events on Argyll Strategy's behalf. The MOD noted the risk of you making use of contacts developed in office for business development purposes, specifically in relation to overseas companies, export markets and security environments. This could offer an unfair advantage to the company, were you to draw specifically on private sector contacts that you only gained as a result of your recent ministerial roles.
9. The Committee noted your extensive career experience in business and strategy. Prior to joining government, you were in business in the consumer sector for nearly 40 years. You stated Argyll Strategy is in a phase of growth where your experience in business may be helpful to the founders.

The Committee's advice

10. There is a limited risk you may be asked to advise Argyll Strategy on matters that overlap with your access to information and responsibilities in office. The Committee therefore imposed a restriction to prevent you from doing so.

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

11. It is significant that Argyll Strategy confirmed its understanding of, and adherence to, the Committee's advice and in particular that you would not be involved in any lobbying of the UK government.
12. The Committee determined the remaining risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time in ministerial service to the unfair advantage of Argyll Strategy.
13. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Argyll Strategy Ltd** 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 Argyll Strategy Ltd (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 Argyll Strategy Ltd (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office you should not undertake any work with Argyll Strategy Ltd (including parent companies, subsidiaries, partners and clients) that involves providing advice 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 its arm's length bodies;
 - for two years from your last day in ministerial service, you should not become personally involved in lobbying contacts in other governments and organisations that you developed during your time in office for the purpose of securing business and/or investment opportunities for Argyll Strategy Ltd (including parent companies, subsidiaries, partners and clients); and
 - for two years since your last day in ministerial office, you should not advise Argyll Strategy Ltd (including parent companies, subsidiaries, partners and clients) on any policy you had specific involvement in or responsibility for as Minister of State at the Ministry of Defence and Minister of State at the Department for Business and Trade, nor where

you had a relationship with the relevant client during your respective roles in office.

14. 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 You are reminded that as a Member of the House of Lords you are prevented from any paid lobbying under the House of Lords 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.
15. 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 Ministerial Code or otherwise.
16. The Business Appointment Rules explain that the restriction on lobbying means that you "*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*".
17. 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 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.
18. 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

ACOBA

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.

Annex – material information

The role

1. According to its website, Argyll Strategy is an an intelligence and strategic communications company with a focus on:
 - Dispute & Crisis Communications
 - Enhanced Due Diligence
 - Government Relations
 - Intelligence-Led Campaigns
 - Investigations & Asset Tracing
 - Litigation Support
 - Mergers and Acquisitions Support
 - Market Entry & Exit
 - Media Relations & Reputation Management
 - Political Risk
 - Social Media & Digital Network Analysis
 - Strategic Intelligence
2. Of your paid, part-time role as Chairman, you stated your responsibilities will involve:
 - monthly meetings to guide and advise the founders on all aspects of the business;
 - providing feedback on monthly updates, discussing revenue, new opportunities, and chairing six-monthly advisory board meetings; and
 - attendance and support at occasional business development events.
3. You stated your role will not involve contact with government.
4. Prior to joining government, you were in business in the consumer sector for nearly 40 years, including leading the team behind the global brand Paperchase. You stated Argyll Strategy is in a phase of growth where your experience in business might be helpful to the founders.

Correspondence with Argyll Strategy

5. Argyll Strategy confirmed in writing its understanding of, and agreement to, comply with the Committee's advice. Specifically, the company confirmed that your role will not include lobbying of, or contact with the UK government on the company's behalf, and you will not be asked to advise on matters relating to the UK defence sector.

Dealings in office

6. You confirmed you did not meet with Argyll Strategy, nor were you involved in decisions specific to the company, nor held sensitive information that may provide an unfair advantage.

Departmental assessment

7. The MOD and DBT confirmed the details you stated and provided their views on your proposed appointment.
8. The MOD and DBT confirmed you did not meet with Argyll Strategy, nor were you involved in any decisions, commercial or otherwise, that were specific to the company. The MOD added that you were not involved in the regulation of corporate intelligence firms, the sector in which Argyll Strategy operates in. The MOD and DBT confirmed they have no relationship with Argyll Strategy and they did not consider you to possess sensitive information that presents an unfair advantage to Argyll Strategy.
9. The MOD stated that you did not formally meet with other consultancy or PR or business intelligence organisations in your ministerial role, although these types of firms were likely present at parliamentary and ambassadorial receptions where you were also a guest and accompanied by officials.
10. The MOD stated that as Minister of State, your responsibilities included promoting UK defence interests overseas, as part of which you would have developed relationships with senior MOD officials with experience of operations, export markets and security/threat environment intelligence overseas. The MOD stated there could be a risk of perception that you could draw on your expertise in support of Argyll Strategy's business development.
11. The MOD's view is that it appeared unlikely that Argyll Strategy would provide services specific to the UK MOD's supply chains or exports. However, there is a risk your contacts developed whilst in the MOD could offer such opportunity - including with companies in overseas export markets and the overseas threats/security environment.
12. The MOD stated that the risk of perception of you providing Argyll Strategy access to officials, whose insights could be useful to the company in their business development, can be mitigated by conditions.
13. DBT did not have concerns with the appointment and recommended the standard conditions plus a ban on lobbying contacts in external companies and external governments you developed whilst in ministerial office.