



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: General Sir Patrick Yardley Monrad Sanders KCB CBE DSO OBE, former Chief of the General Staff at the Ministry of Defence. Paid appointment with STARK.

1. General Sir Patrick 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 proposal to work with STARK as a Strategic Advisor.
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 by General Sir Patrick during his time in office, alongside the information and influence he may offer STARK. 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 Rules¹ 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

5. There is significant overlap between General Sir Patrick's responsibilities at the

¹ 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.

Ministry of Defence (MOD) and the role at STARK, as the company operates in the defence and security sector. General Sir Patrick will have made decisions at the MOD that broadly impact the sector STARK operates in. It is significant that this company was formed as General Sir Patrick was leaving office and he did not meet with the company, nor did he make any decisions specific to the company during his time in service, nor is there a relationship between STARK and the MOD. The Committee² therefore considers the risk this appointment could be reasonably perceived as a reward for decisions made, or actions taken, in office is low.

6. As former Chief of the General Staff, General Sir Patrick will have had access to a broad range of sensitive information around the UK's defence requirements and capabilities for operations, which could provide an advantage to any company operating in the defence and security sector. The MOD said he would have knowledge of long-term strategic thinking of applications of technology (i.e., drones and AI). He also had oversight, and therefore knowledge of, capability requirement setting and deployment of tactical drones, such as those marketed by STARK.
7. There are a number of mitigating factors that help reduce the risks associated with his access to information and insight that may be seen to offer STARK an unfair advantage:
 - Whilst General Sir Patrick had oversight of capability requirement setting and deployment of tactical drones, the MOD confirmed he was not involved in specific commercial or financial arrangements with suppliers – and therefore he did not have access to information on competitors that would provide an unfair advantage.
 - General Sir Patrick left his role as Chief of the General Staff in June 2024 and his last day in Crown Service was 31 December 2024. This provides a gap of 12 months between his access to privileged information and decision-making at the MOD, and his taking up of this work – reducing the currency of his access to information.
 - Given the change of government and publication of The Strategic Defence Review 2025,³ which outlines the overarching framework for drone and AI use in UK defence, it is likely matters concerning the use of these technologies in UK defence have moved on since General Sir Patrick's departure from government.
 - The speed of the development of artificial intelligence is also relevant, given capabilities and products will have progressed significantly in the last 12 months.

² This application for advice was considered by Isabel Doverty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CBE; Michael Prescott; and The Baroness Thornton.

³ <https://www.gov.uk/government/publications/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad>

8. Given STARK's business is defence drones and AI software, it is difficult to demonstrate that General Sir Patrick's wide access to information at the MOD and his proximity to decisions and other senior decision-makers at the heart of government could not benefit STARK unfairly. This risk is most likely to arise if he were to advise on UK-based defence issues. General Sir Patrick said his role with STARK would be focused on non-UK markets and would involve no contact with the UK government.
9. The MOD acknowledged that General Sir Patrick has contacts and influence at the highest levels of international governments and in UK defence, and the Committee considered he undoubtedly has contacts in the wider defence industry and within NATO militaries and allies. Whilst explicit business development is not part of his role, it does have a focus on growth. There is therefore a risk that he could be seen to offer STARK unfair access to business opportunities as it grows its presence across Europe and seeks business with NATO militaries and their allies, should he make use of such contacts gained in office as Chief of the General Staff.
10. There is also a significant risk that General Sir Patrick could be seen to offer unfair access and influence within the UK government. The Committee considered it relevant that STARK is a partner with the UK-based All-Party Parliamentary Group on Defence Technology,⁴ and likely has an interest in the UK defence market. Whilst General Sir Patrick said his role will not involve any contact with government, the Committee agreed that given STARK's work and the above factors, any contact he has with the UK government or the MOD would risk being seen as lobbying for the purposes of gaining business. Any contact initiated by the government would not be contrary to the Rules or the Committee's advice.
11. The MOD also suggested that General Sir Patrick may offer an unfair advantage to STARK in relation to the UK MOD's involvement in and funding of international defence programmes given his seniority and access at the MOD until relatively recently. The Committee agreed.
12. The Committee asked STARK to confirm its adherence to the Committee's advice.

The Committee's advice

13. The Committee recognised that General Sir Patrick's ability to offer an unfair advantage to STARK through any specific piece(s) of information was limited, but

⁴ https://www.defencetechappg.org.uk/partner_stark

considered General Sir Patrick's role in the MOD to present real and perceived risks associated with his access to information. This is most likely to arise in relation to the company's potential business in the UK defence market. The Committee has therefore imposed a condition which prevents him from advising on the UK defence market – which is in keeping with the role as he describes it.

14. The MOD separately recommended that General Sir Patrick be prevented from advising on UK government funding of defence programmes for other nations. The Committee has agreed this to be a prudent course of action and to impose an additional condition which prevents him from advising on UK government funding of defence programmes for other nations.
15. It is significant that STARK has confirmed its adherence with the Committee's advice. In particular, that General Sir Patrick would not be involved in any lobbying of the UK government or advise STARK on the UK defence market and on UK government funding of defence programmes for other nations.
16. The remaining conditions below are considered to appropriately mitigate the risks associated with his access to privileged information, contacts and influence gained as a result of his time in Crown service.
17. The Committee advises, under the Government's Business Appointment Rules, that General Sir Patrick's role with **STARK** 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, the MOD or their arm's length bodies on behalf of STARK (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage STARK (including parent companies, subsidiaries, partners and clients);
 - for two years from his last day in Crown service, he should not provide advice to STARK (including parent companies, subsidiaries, partners and clients) 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 or their arm's length bodies;

- for two years from his last day in Crown service, he should not become personally involved in lobbying contacts he has developed during his time in office and in foreign governments and external organisations (including NATO and its allied nations' governments and/or militaries) for the purpose of securing business for STARK (including parent companies, subsidiaries and partners);
- for two years from his last day in Crown service, he should not advise STARK on the UK defence market and UK government funding of defence programmes for other nations; and he must not directly engage with the UK government, the MOD or their arm's length bodies on STARK's behalf (including parent companies, subsidiaries, partners and clients).

18. The advice and the conditions under the government's Business Appointment Rules relate to General Sir Patrick'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' Interests⁵. 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. General Sir Patrick must inform us if and when he takes up this role 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.

⁵ 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, the advice letter will be published.

Yours sincerely,

Emily Gillman
Committee Secretariat

Annex – material information

The role

1. According to its website, STARK is a technology-driven defence company that specialises in developing unmanned systems (designed to perform missions without a human operator on board – otherwise known as autonomous systems). It is committed to selling its products to only the militaries of NATO member states and their closest allies. It works in close collaboration with NATO militaries and allies to test its systems.
2. General Sir Patrick said STARK was formed relatively recently, as he was leaving office.
3. It has locations across Europe, such as Berlin, Munich and Kyiv and a German production hub. It is building relationships across Europe with suppliers of components to create a European supply chain.
4. STARK is listed as a partner of the UK-based All-Party Parliamentary Group on Defence Technology.⁶ According to its website, the All-Party Parliamentary Group on Defence Technology provides a forum for parliamentarians, industry leaders, and other stakeholders to explore developments in defence technology, assess impacts on national security, and address policy challenges. By becoming a partner, companies can ‘help drive meaningful policy conversations, support UK innovation, and ensure that Parliament remains engaged with the latest in defence technology.’
5. STARK has two main products listed on its website:
 - Unmanned systems – STARK OWE-V: Virtus
 - A vertical take-off and landing strike drone designed for independent missions. This type of drone is typically intended for a single mission and is often destroyed in the process.
 - AI software – STARK CWC Minerva
 - This software allows one person to control multiple unmanned systems and weapons at the same time, rather than needing a different operator for each vehicle – allowing for the coordination of various drones and unmanned vehicles, regardless of their manufacturer.
6. General Sir Patrick wishes to take up a part-time, paid role with STARK as a Strategic Advisor. General Sir Patrick said his role would involve:

⁶ https://www.defencetechappg.org.uk/partner_stark

- Providing advice on operational need and use-cases for unmanned systems across domains
- Advising on geo-political opportunities and risks
- Advising on non-UK markets
- Mentoring board members on corporate leadership, engagement and business growth strategy and transformation

7. General Sir Patrick confirmed this appointment will not involve contact with government or his former department, the MOD.

Correspondence with STARK on compliance

8. STARK has provided the Committee with confirmation that Sir Patrick's role will be appropriately ring fenced in adherence to this advice. It presented evidence that the advice and conditions have been integrated into his consulting agreement. In particular, the Agreement states:

- *'The Consultant shall adhere to the provisions of [ACOPA's] Advice in respect of [STARK], its subsidiaries, partners or clients (collectively "[STARK] and its affiliates")'*
- *'Should the Consultant have reason to believe that any activities instructed by [STARK] and its affiliates contravene or threaten to contravene the Advice, he shall immediately notify the General Counsel of [STARK].'*

Information in the public domain

9. The Strategic Defence Review 2025^{7,8,9} –

- Published on 2 June 2025, the Strategic Defence Review 2025 (SDR) sets out the pathway to transform Defence in the UK – with a vision that, by 2035, UK Defence will be 'a leading tech-enabled defence power, with an Integrated Force that deters, fights, and wins through constant innovation at wartime pace.'
- As one of its five priorities, the SDR includes an accelerated 'shift towards greater use of autonomy and Artificial Intelligence within the UK's conventional forces' and the 'harnessing [of] drones, data and digital warfare.'

⁷ <https://www.gov.uk/government/publications/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad>;

⁸ <https://www.gov.uk/government/publications/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad#the-integrated-force-a-force-fit-for-war-in-the-21st-century-1>

⁹ <https://www.gov.uk/government/speeches/strategic-defence-review-oral-statement#:~:text=Committing%20the%20largest%20sustained%20increase.3%25%20in%20the%20next%20parliament>

- Relevant to this application and as part of the SDR, government has committed to:
 - increase defence spending to 2.5% of GDP by 2027 and 3% in the next Parliament;
 - 'double investment into autonomous systems this Parliament';
 - establishing a 'protected Defence AI investment fund' to protect investment in defence AI research and development; and
 - establishing a 'new Defence Uncrewed Systems Centre by February 2026'

Dealings in office

10. General Sir Patrick advised the Committee that he did not meet with STARK whilst in office, which was only recently formed. He said he did not have involvement in any policy development or decisions that would have been specific to the company, and held no commercial or contractual responsibilities relating to it. He said he did not meet with competitors of the company, nor did he have access to sensitive information regarding these competitors.

Departmental assessment

11. The MOD confirmed that General Sir Patrick made no regulatory, commercial or policy decisions specific to STARK.

12. The MOD confirmed that General Sir Patrick did not have contact with STARK during his time in service and that the MOD does not have a relationship with STARK.

13. The MOD stated that Sir General Patrick did not have access to information specific to STARK, but he would have knowledge of long-term strategic thinking of applications of technology (i.e., drones and adoption of AI). Further, he will have had overall oversight of capability requirement setting and deployment of tactical drones, such as those marketed by STARK, although he was not involved in specific commercial or financial arrangements with suppliers.

14. The MOD recognised that General Sir Patrick has contacts and influence at the highest levels of UK Defence and within international governments.

15. The MOD recommended that further to the standard conditions, General Sir Patrick's role with STARK should be limited so that he is prevented from:

- advising on the UK defence sector or on opportunities for UK

- government funding of defence programmes for other nations¹⁰; and
- having any direct engagement with the MOD or UK government on behalf of STARK.

¹⁰ For example – The International Fund for Ukraine is a funding mechanism administered by the UK MOD on behalf of an executive panel comprising the UK, Norway, Netherlands, Denmark, Sweden, and Lithuania – handling bids and contracts related to military support for Ukraine. DE&S with the MOD manages the sourcing and delivery of equipment required by Ukraine, as a result of decisions agreed via the IFU.