

Committee on Standards

Bob Stewart

First Report of Session 2024–25

HC 455

Committee on Standards

The Committee on Standards is appointed by the House of Commons to oversee the work of the Parliamentary Commissioner for Standards, except in relation to the conduct of individual cases under the Independent Complaints and Grievance Scheme; to examine the arrangements proposed by the Commissioner for the compilation, maintenance and accessibility of the Register of Members' Financial Interests and any other registers of interest established by the House; to review from time to time the form and content of those registers; to consider any specific complaints made in relation to the registering or declaring of interests referred to it by the Commissioner; to consider any matter relating to the conduct of Members, including specific complaints in relation to alleged breaches in the Code of Conduct which have been drawn to the Committee's attention by the Commissioner; and to recommend any modifications to the Code of Conduct as may from time to time appear to be necessary.

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Publication

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Report

Introduction

1. This report arises from an investigation by the Parliamentary Commissioner for Standards into whether the Rt. Hon Colonel Bob Stewart, then Member of Parliament for Beckenham, breached the rules relating to the registration and declaration of interests in the Code of Conduct for Members of Parliament (the Code). The case concerns two external positions held by Colonel Stewart between 2010–11 and 2015–2017, engaging the 2009, 2012 and 2015 Codes.¹ During the investigation, the Commissioner extended his inquiry to consider whether Colonel Stewart also breached Paragraph 12 of the 2023 Code, relating to cooperation with the Commissioner’s investigation.²
2. The Commissioner submitted a memorandum relating to these matters setting out full details of his inquiry, which is appended to this report.³ Written evidence is published on our webpages. Colonel Stewart submitted written evidence to the Committee and indicated that he did not seek to give oral evidence.⁴ In this report we summarise the Commissioner’s findings and Colonel Stewart’s position, before setting out our conclusions and recommendations on the case.
3. Colonel Stewart stood down as a Member of Parliament at the end of the 2019–24 Parliament and is no longer a Member of the House. Notwithstanding this, the Committee is required to continue with the case put before it by the Commissioner shortly before the June 2024 Dissolution of Parliament. The House’s Procedural Protocol states that:

1 House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2008–2009, [HC 735](#), para 16; House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2011–12, [HC 1885](#); para 13 ; House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2014–2015, [HC 1076](#), para 13

2 House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2022–23, [HC 1083](#), para 12

3 Published with this report as Appendix 1

4 Published with this report as Appendix 2

If Parliament is dissolved during the Committee’s consideration of a case, it will resume its consideration once the Committee is re-established, whether or not the subject Member has been returned at the election.⁵

Background

4. This case results from a self-referral by Colonel Stewart on 21 June 2023 following an article published by *openDemocracy*. The article alleged that he had failed to register and declare his remunerated position at what it called a “foreign defence company”, Ksantex S.à.r.l (Ksantex), between February 2015 and July 2017, while he was a member of the House of Commons Defence Committee.⁶ In his self-referral email, Colonel Stewart stated that he had registered a role with VES Consultancy a few years earlier, which formed part of the “same group of companies” as Ksantex, and that he had “omitted to register a change in name of the companies”.⁷ The Commissioner opened an inquiry to consider Colonel Stewart’s compliance with the rules with regard to his positions at both companies.⁸
5. Before becoming an MP in 2010, Colonel Stewart had a career in the British Army and in 2009 published a book entitled *Leadership Under Pressure: Tactics from the Front Line*. According to Colonel Stewart, he was approached to work for VES Consultancy to give “occasional lectures on leadership and decision-making based on the principles in [his] book”. He states that his work for VES ceased in 2011 and he was approached again in 2015 to deliver similar leadership training for another company, Ksantex, which had the same owner, Mr Khagani Bashirov.⁹ A member of Colonel Stewart’s parliamentary staff, Dr Reza Tebrizi, wrote to the Commissioner explaining that he had recommended that Colonel Stewart work for Mr Bashirov. Dr Tebrizi had previously worked alongside Mr Bashirov in Azerbaijan.¹⁰
6. There is limited information publicly available about VES Consultancy or Ksantex S.à.r.l. Colonel Stewart’s evidence to the Commissioner states that Vnesh Expert Services (VES) was registered in Azerbaijan in 1991 and

5 House of Commons, [Procedural Protocol in respect of the Code of Conduct](#) (Session 2022–23, HC 1084), para 75. Standing Order No. 149 (10) provides that “The committee [...] shall have power to refer to unreported evidence [...] of former Committee on Standards and to any documents circulated to any such committee”.

6 Written evidence, pp.78–81

7 Written evidence, p.2

8 Written evidence, p.3

9 Written evidence, pp. 9-10

10 Written evidence, p.68

specialises in consultancy, registration of companies and translation.¹¹ Ksantex is a company based in Luxembourg and was included on the Luxembourg Business Register with the following company purpose:

The company's purpose shall be the provision of services in support, assistance and advice to companies and international project management particularly in civil engineering, transport, telecommunications and civil aviation.

7. On 20 March 2017, while Colonel Stewart was still involved with the company, it registered a change of purpose to include “the wholesale and retail of all articles of sporting equipment, tactical equipment or professional clothing intended for security or defence.”¹²
8. Colonel Stewart was not able to provide a contract of employment for either position, although he refers to his work as consultancy.¹³ There are no records of his position with VES Consultancy. However, the role was registered by Colonel Stewart in July 2010 on the Register of Members' Financial Interests as follows:

Provision of leadership/planning training and advice for VES Consultancy (UK) Ltd 30 Borough High St London SE1 1XU for one year from 1 July 2010, for which I am paid a retainer of £3,000 a month...¹⁴

9. Colonel Stewart did not register his later role with Ksantex. Documents provided by the current CEO of Ksantex refer to him as an “administrative manager” and “director of company”.¹⁵

The Commissioner's findings

10. The Commissioner's investigation focused on whether Colonel Stewart had breached:

- a. Paragraph 16 of the 2009 Code:

Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Interests and shall always draw attention to any relevant interest in any proceeding of the House or its Committees, or in any communications with Ministers, Government Departments or Executive Agencies.

11 Written evidence, p.42

12 Appendix 1, para 9.5

13 Written evidence, p.20

14 Register of Members' Financial Interests at [6 September 2010](#).

15 Written evidence, pp.76-77

b. Paragraph 13 of both the 2012 and 2015 Codes:

Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. They shall always be open and frank in drawing attention to any relevant interest in any proceeding of the House or its Committees, and in any communications with Ministers, Members, public officials or public office holders.

c. Paragraph 12 of the 2023 Code:

Members must co-operate at all times with the Parliamentary Commissioner for Standards in the conduct of any investigation and with the Committee on Standards and the Independent Expert Panel in any subsequent consideration of a case.¹⁶

Registration of interests

11. The Commissioner has given the opinion that Colonel Stewart breached the rules relating to registration of interests. He found that Colonel Stewart's employment with VES Consultancy had been registered inaccurately in the following ways:

- The termination date of his involvement with the company was incorrect. Colonel Stewart's role was on the Register between July 2010 and March 2012. However, he ceased working for the company in October 2011. The 2009 Guide to the Rules that applied at the time states that it is the responsibility of Members to notify changes in their registrable interests within four weeks.¹⁷
- The name of the company on Colonel Stewart's entry to the Register, "VES Consultancy (UK)", was incorrect. He confirmed it was Vnesh Expert Services.

¹⁶ House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2008–2009, [HC 735](#), para 16; House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2011–12, [HC 1885](#); para 13 ; House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2014–2015, [HC 1076](#), , para 13; House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2022–23, [HC 1083](#), para 12

¹⁷ House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2008–2009, [HC 735](#), Chapter 1, para 13; To note, this time limit has been 28 days since 2015.

- Colonel Stewart did not register all his earnings from the role. He initially told the Commissioner that he was paid £3,000 per month during his tenure but registered only three payments of £3,000, in July, September and October 2010.¹⁸

12. The Commissioner also found that:

- Colonel Stewart failed to register his role with Ksantex S.à.r.l.
- Colonel Stewart failed to register two payments from Ksantex S.à.r.l of £32,277.87 on 14 December 2015 and £41,385.20 on 18 September 2017.

Declaration of interests

- 13.** The Commissioner was unable to make a finding as to whether Colonel Stewart should have declared his role with Ksantex to the Defence Committee, as he could not ascertain whether the role met the “test of relevance” (discussed in paragraph 23 below). The Commissioner concluded that in the absence of sufficient information on the nature of the employer company it was not possible for him to determine whether Colonel Stewart had breached the declaration rules.¹⁹

Cooperation with the Commissioner’s inquiry

- 14.** The Commissioner has given the opinion that Colonel Stewart breached Paragraph 12 of the 2023 Code, which requires Members to cooperate fully with an inquiry. The Commissioner stated that Colonel Stewart “repeatedly failed to provide accurate and complete information” during the investigation,²⁰ and he identified several inconsistencies with Colonel Stewart’s evidence, including:
- a.** Colonel Stewart initially said his involvement with VES Consultancy was between 2012 and 2015. He later stated his employment was between July 2010 and October 2011.
 - b.** Colonel Stewart said he was employed and paid by VES Consultancy UK. However, the Commissioner discovered via Companies House records that the company had been dormant during his supposed tenure. Colonel Stewart subsequently informed the Commissioner that he had been employed by VES Azerbaijan, before changing this again to Vnesh Expert Services.

18 Appendix 1, para 7.1 & 7.15

19 Appendix 1, para 9.18

20 Appendix 1, 10.17

- c. Colonel Stewart initially said he received £3,000 per month from Ksantex. After the current CEO of Ksantex provided the Commissioner with a document recording a payment of €45,600, Colonel Stewart corrected his evidence to say that he had received €45,600 per annum and there was no additional payment. The Commissioner asked to see relevant bank statements, which showed that Colonel Stewart had received two payments; £32,277.87 on 14 December 2015 and £41,385.20 on 18 September 2017.
- d. Colonel Stewart said that he delivered six or seven seminars annually for Ksantex. He later provided the Commissioner with a record of 16 seminars, starting on 9 March 2015 and ending on 17 July 2017. The current CEO of Ksantex, in post since February 2017, said that he was unaware of any seminars being delivered and provided a document that stated Colonel Stewart’s employment ceased in June 2017.
- e. Colonel Stewart says he provided only leadership seminars and had no decision-making powers in the companies. However, the CEO of Ksantex provided documents signed by Colonel Stewart referring to his role as Administrative Manager. Mr Bashirov also stated during an interview with *openDemocracy* that Colonel Stewart was on the board of directors, although his duties were limited to consultancy.²¹

15. The Commissioner gave the opinion that:

[Colonel Stewart’s] responses have been contradictory, sparse or continually changing... This has not only prolonged the timeline of this investigation but has also resulted in unanswered questions and gaps in the evidence...

Whilst it is not clear from the evidence whether the failings identified are deliberate or inadvertent, the number identified highlight Colonel Stewart’s failure to undertake due diligence before responding to my [inquiries] and in my view, demonstrates Colonel Stewart’s failure to treat this investigation seriously and therefore his failure to cooperate with my investigation to the standard required by the Code.²²

16. The Commissioner also reached the view that Colonel Stewart had shown indifference to several of the Seven Principles of Public Life (Nolan Principles): integrity; accountability; openness; honesty; and leadership.²³

21 Appendix 1, paras 10.2- 10.15

22 Appendix 1, para 10.16–10.17

23 Appendix 1, para 11.1 and 13.1

Colonel Stewart's position

17. Having been supplied with the Commissioner's memorandum, Colonel Stewart submitted written evidence in the form of a letter to the Clerk of the Committee.²⁴ He accepts that he failed to register his role at Ksantex and the payments, and that this was a registrable interest. He apologises, explaining he "made a careless mistake and not a deliberate one". He also accepts that he had registered his previous role with VES Consultancy "imperfectly". Colonel Stewart maintained that Ksantex was not a defence-related company and that he therefore did not think there was any need to declare it to the Defence Committee.²⁵ He stated in a letter to the Commissioner:

Neither VES Consultancy nor Ksantex SARL had or have had any involvement with Defence matters during my period of working for them to the best of my knowledge. Certainly, I did not think my work with them impacted on any Defence matter. Neither did I advance or mention the interests of either company in public or in Parliament.

As far as I was concerned, I was simply involved to deliver leadership training and took no part in either company's wider activities.²⁶

18. In an interview with the Commissioner, Colonel Stewart said that he had no intention to deceive the Commissioner and was endeavouring to remember events from some time ago. He provided the following explanations for discrepancies in his evidence:
- a. He assumed that he was paid by VES Consultancy UK and, when it was revealed that this was a dormant company, he presumed the company had been called VES Azerbaijan, because he "was talking to people in Azerbaijan" during the seminars. The employer name he finally confirmed, Vnesh Expert Services, was just "the long title".
 - b. He had forgotten that he had received two lump sum payments from Ksantex because he had confused the £3,000 per month he had received while working for VES Consultancy in 2010–2011, with his later payments from Ksantex. The total, he said, worked out as roughly £3,000 per month.
 - c. He had had no dealings with the current CEO of Ksantex and acted on instructions from Mr Bashirov, which is why the present CEO was unaware of his seminars. He said that he had been content to deliver

24 Appendix 2

25 Appendix 2

26 Written evidence, p.11

a seminar after his employment ceased in June 2017, because he “enjoyed doing it” and “the money wasn’t actually something [he] kept an eye on” [sic]...

- d. His role, he said, consisted of acting as a leadership consultant, and he never went to a board meeting, or acted as a director of the company, despite the terminology in certain documents provided by Ksantex.²⁷

19. In his written evidence to the Committee, Colonel Stewart states:

Certainly I had no intention of breaching the Nolan Principles and my answers to the Commissioner for Standards were given in good faith and also what I believed to be the case at the time.²⁸

The Committee’s findings

Registration of interests

20. We concur with the Commissioner’s opinion that Colonel Stewart failed to comply with the rules in relation to the registration of interests with regard to his roles with VES Consultancy (2010 to 2011) and Ksantex (2015 to 2017). Paragraph 16 of the 2009 Code and Paragraph 13 of the 2012 and 2015 Codes state that “Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests”, yet Colonel Stewart made numerous errors and omissions in his entries to the Register of Members’ Financial Interests. He failed to register his role with Ksantex altogether and incorrectly registered various details of his employment with VES Consultancy. His explanation that he “omitted to register a change in name of Companies ... [which] changed from VES Consultancy to Ksantex SARL both in the same group of companies...”²⁹ does not adequately explain these mistakes. Other than having the same owner, the two companies appear to be entirely separate businesses. Colonel Stewart accepts responsibility for “being slip-shod in [his] approach to registration of interests” and we recognise and appreciate that he is apologetic for these errors.³⁰ Nonetheless, we do not feel that he made sufficient effort to “conscientiously” fulfil his obligations under the Code with respect to the registration of interests.

27 Written evidence, pp. 55–68

28 Appendix 2

29 Written evidence, p.2

30 Appendix 2

21.

CONCLUSION

We agree with the Commissioner that Colonel Stewart did not register his role with VES Consultancy correctly and was in breach of Paragraph 16 of the 2009 Code of Conduct. We find that the name of the employer was incorrect, the role was not removed from the Register at the correct time, and not all payments for the role were registered.

22.

CONCLUSION

We agree with the Commissioner that Colonel Stewart breached both the 2012 and 2015 Code of Conduct by failing to register his position with Ksantex between 2015 and 2017 and the payments he received.

Should Colonel Stewart have declared his Ksantex role to the Defence Committee?

23. The 2012 and 2015 Codes of Conduct that applied at the time of Colonel Stewart’s role at Ksantex³¹ state “[Members] shall always be open and frank in drawing attention to any relevant interest in any proceeding of the House or its Committees...”³² The Guide to the Rules also explains that the test of relevance is whether those interests “might reasonably be thought by others to influence” the Member’s actions.³³ Colonel Stewart maintains that his role did not meet the test of relevance because the business was not involved in defence matters. However, he also admits he knew very little about the company.³⁴ The Commissioner gave the opinion that he was unable to find sufficient information about Ksantex or Colonel Stewart’s appointment to determine whether he accurately applied the test. We have considered this.
24. In his memorandum, the Commissioner highlights some evidence that suggests that Ksantex may have been involved in defence. This includes the fact that there are images on an archived version of its website from 2016 that depict military combat and the fact that the company changed its registered purpose to include a reference to selling equipment and clothing

31 Colonel Stewart held the role at Ksantex between February 2015 and July 2017. The 2015 Code of Conduct applied for most of this time, having been approved by the House of Commons on 17 March 2015.

32 House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2011–12, [HC 1885](#); para 13; House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2014–2015, [HC 1076](#); para 13

33 House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2011–12, [HC 1885](#); Chapter 2, para 74; House of Commons, The Code of Conduct and The Guide to the Rules relating to the Conduct of Members, Session 2014–2015, [HC 1076](#).; Chapter 2, para 2 & para 5

34 Written evidence, p.19

for defence in March 2017.³⁵ We note that we have not seen any evidence that suggests that the company was involved in defence matters at the time when Colonel Stewart joined it in 2015. We are mindful, therefore, that when he made his initial assessment on whether to declare his role to the Defence Committee it seems there were no obvious links to defence. However, Colonel Stewart remained under an obligation to make a later declaration of interests if the nature of the business or of his role changed sufficiently to meet the test during the time for which he was connected with the company.

25. The current CEO of Ksantex stated that the company “never dealt directly or indirectly with military equipment or arms.”³⁶ A letter to the Commissioner from Dr Tabrizi also said “although it did appear to be a military company, this was all for marketing purposes, nothing more.”³⁷ Similarly, Mr Bashirov said to *openDemocracy* that Ksantex never sold or bought military equipment, although he did say: “It is a consulting company in the field of civil and military radars.”³⁸ Colonel Stewart maintains:

The Ksantex SARL website appears to be exaggerating and I gather it was a marketing ploy to try to get more business... I am assured that Ksantex SARL has never dealt in military equipment which I understand Khagani Bashirov and Dr Reza Tabrizi have stated in their statements.³⁹

26. In relation to Colonel Stewart’s role in the company, he and Dr Tabrizi maintain that he acted as a “consultant”, providing leadership seminars.⁴⁰ Colonel Stewart provided a list of 16 dates on which he delivered seminars, as well as an example of his presentation slides.⁴¹ With regard to Colonel Stewart’s appointment to the board, the CEO of Ksantex suggested it “perhaps was good for the credibility of the company to have a British Colonel on the board”.⁴² Colonel Stewart, however, signed a document as “Administrative Manager”. Questioned by the Commissioner on why he had done that, Colonel Stewart wrote:

I have no idea why they called me an “administrative manager”. Mr Bashirov called me a consultant and as such I only made presentations. I was not a decision-maker in any VES or Ksantex business (both owned by Mr Bashirov).⁴³

35 Appendix 1, paras 9.4–9.5

36 Written evidence, p.72

37 Written evidence, p.69

38 Written evidence, p.93

39 Written evidence, p.32

40 Written evidence, p.42 & p.68

41 Written evidence pp.31–39

42 Written evidence, p.72

43 Written evidence, pp.42–43

27. The Commissioner notes that his investigation did not see any evidence that Ksantex had entered into defence contracts,⁴⁴ and nor have we seen evidence that suggests Colonel Stewart was directly involved in any decision-making within the company. Nonetheless, we are conscious that an external party looking at the Ksantex website could have, mistakenly or otherwise, inferred it to be a defence-related company. Similarly, the fact that Colonel Stewart was appointed to the board of the company could have been taken to mean he was actively involved in the decisions of what could be perceived to be a defence-related company.
28. Colonel Stewart conducted only very limited checks on the company before accepting the role with Ksantex. That, along with his carelessness in signing official documents with a supposed incorrect job title, are matters for some concern. It is not up to a Member of the House alone to judge whether an interest they hold might meet the test of relevance for declaration, particularly if they possess limited information on who it is who is employing them. The test is whether others might see an interest as relevant.

29. **CONCLUSION**

The test of relevance is whether an interest “might reasonably be thought by others to influence” the Member’s actions. For at least some of the time when Colonel Stewart was in post at Ksantex, both its website and its company purpose suggested some involvement in defence-related matters. Colonel Stewart also appeared to hold an executive position in the firm. Given those two points, we believe that his role met the test of relevance, as it could have reasonably been thought by others to influence his role on the Defence Committee. We fully understand why the Commissioner was unable to make a finding on this matter, owing to the absence of information about the company and the absence of evidence retained by Colonel Stewart in relation to both his role and his employer. However, we do not believe Colonel Stewart’s indifference to due diligence absolves him of his obligations under the Code.

30. **CONCLUSION**

Colonel Stewart should not have accepted an appointment without undertaking sufficient checks on the nature of the employer company and his terms of employment. If there were any reasonable doubt as to whether the role should have been declared, he should have consulted the relevant officials for advice. Colonel Stewart took neither of those courses, and we must make a judgement based on the evidence available to us.

44 Appendix 1, para 9.15

31. CONCLUSION

We conclude that Ksantex could have reasonably been inferred to be a defence-related company for at least some of the time during which Colonel Stewart worked for it. Colonel Stewart, as a member of the Select Committee on Defence, should therefore have declared his role to that Committee. We find him in breach of the rule on declaration contained in paragraph 13 of the 2015 Code of Conduct. Members, experienced or new, should familiarise themselves with rules and practice regarding declaration, and how requirements to declare an interest may align with and be necessary in addition to registration of an interest.

Cooperation with the Commissioner’s investigation

- 32.** Paragraph 12 of the 2023 Code states that “Members must co-operate at all times with the Parliamentary Commissioner for Standards in the conduct of any investigation”. We note that Colonel Stewart showed willingness to cooperate with the investigation in that it was initiated following a self-referral (albeit following the article published by *openDemocracy*), and he responded to the Commissioner’s requests for information within the set deadlines and participated in two interviews.⁴⁵ However, we also recognise the Commissioner’s view that the many contradictions in Colonel Stewart’s evidence (see paragraph 14) “prolonged the timeline” of the investigation and “resulted in unanswered questions and gaps in the evidence”.⁴⁶
- 33.** The Commissioner takes the view that the Colonel’s “failure to undertake due diligence before responding to [his inquiries]” demonstrates a failure to cooperate with the investigation fully, and therefore constitutes a breach paragraph 12 of the Code.⁴⁷ We agree that Colonel Stewart should have been more careful in verifying his account of events before engaging in interviews and correspondence with the Commissioner. We are equally not convinced that the passage of time provides an adequate excuse for the confusions and errors in his evidence.

45 Appendix 1, para 10.16

46 Appendix 1, para 10.15

47 Appendix 1, para 10.16–10.17

34. CONCLUSION

We thank the Commissioner and his team for their resilience throughout this lengthy and complex investigation. We consider that fault for the prolonged timeline lies with Colonel Stewart, owing to the contradictory evidence he gave, which meant that new lines of inquiry had to be considered. The sheer number of inaccurate and incomplete statements in his evidence suggests that Colonel Stewart did not adequately prepare before engaging with the Commissioner’s inquiries. Nor did he treat the investigation with the seriousness it merits, not least as such unregistered sums as £41,385.20 and £32,277.87 are difficult to overlook or forget. We stress that it is wholly unacceptable for Members under investigation for alleged breaches of the Code of Conduct to show indifference to the standards system set up by the House. Colonel Stewart clearly did not “co-operate at all times” with the Commissioner’s investigation and we therefore find him to be in breach of Paragraph 12 of the 2023 Code of Conduct.

Decision

35. CONCLUSION

We agree with the Commissioner’s opinion that Colonel Stewart breached the relevant registration rules in relation to his roles with VES Consultancy and Ksantex S.à.r.l and Paragraph 12 of the 2023 Code of Conduct, relating to the cooperation with the Commissioner’s investigation. We also find that Colonel Stewart breached the relevant declaration rules in relation to his role at Ksantex S.à.r.l, whilst serving as a Member of the Defence Select Committee.

36. Colonel Stewart demonstrated an evident lack of awareness of his obligations under the Code of Conduct. Like all Members, he was under an obligation to understand and comply with the House’s registration and declaration requirements. If he had any doubt about his obligations under the rules, he ought to have sought advice from the Office of the Parliamentary Commissioner for Standards and from the Registrar of Members’ Financial Interests.

37. The evidence is clear that Colonel Stewart breached the House’s rules as set out above. We have, however, found it more challenging to determine whether his actions were deliberate. Colonel Stewart maintains that it was “slackness not deliberate criminality” that led to his mistakes. He has also

repeatedly apologised, including an offer made, while he was a serving Member, to apologise publicly on the floor of the House.⁴⁸ These signs of contrition are welcome.

38. On the other hand, given the number of years that this case covers, we cannot accept that “slackness” offers a sufficient explanation for Colonel Stewart’s repeated failures to comply with the House’s rules.

39. **CONCLUSION**

In our view, Colonel Stewart’s breaches of the Code of Conduct were significant in nature. For a senior Member to commit several breaches, spanning three Codes of Conduct and a period of fourteen years, shows a blatant disregard for the rules. It is integral to the transparency of the standards system that Members accurately register their outside interests and make declarations in relevant proceedings. Nor are minor sums involved in these repeated breaches: payments of £41,385.20 and £32,277.87, for example, went entirely unregistered. It is equally essential that Members engage fully and cooperatively with any inquiries by the Parliamentary Commissioner for Standards.

40. **CONCLUSION**

Compliance and cooperation depend on a Member sufficiently informing themselves about the nature of their employer and the role they will perform for their pay. Colonel Stewart did not have that information and did not take satisfactory steps to acquire it when requested by the Commissioner. His actions were at worst deliberate, at best dismissive of his responsibilities. He had ample opportunity during his time in Parliament and during this investigation to seek relevant information and advice to ensure his compliance with the rules set by the House.

Recommendation

41. In accordance with our usual practice, we have considered whether there are any aggravating or mitigating factors in relation to this case. We have taken into account the table of potential aggravating and mitigating factors set out in a previous report from the Committee and approved by the House in 2021.⁴⁹
42. We consider the following to be aggravating factors:

48 Written evidence, p. 28

49 Committee on Standards, Seventh Report of Session 2019–21, Sanctions in respect of the conduct of Members [HC 241](#), para 80. The report was published on 21 July 2020 and approved by the House on 21 April 2021.

- Colonel Stewart was a senior Member of the House, having been first elected in 2010, being a Privy Counsellor, and serving on one of the House’s most prominent select committees.
- Colonel Stewart’s repeated errors in his entries to the Register of Members’ Financial Interests over a period of years indicates that this was part of a pattern of behaviour, not a ‘one-off’ lapse.
- Colonel Stewart repeatedly failed to register payments to him, notably the payments of £41,385.20 and £32,277.87 received from Ksantex and discovered only during the course of this inquiry.
- Colonel Stewart did not seek advice from the relevant House officials when it would have been reasonable for him to have done so.
- Colonel Stewart demonstrated disregard for one or more of the General Principles of Conduct, including five of the ‘Seven Principles of Public Life’ highlighted in the Commissioner’s memorandum: integrity; accountability; openness; honesty; and leadership.
- In relation to his non-cooperation with the investigation process, Colonel Stewart had previously been sanctioned by the Committee on Standards in July 2021 and would therefore have been well aware of the approach to evidence collection taken by the Commissioner and the need to provide accurate and timely information during an investigation.

43. We consider the following to be mitigating factors:

- Colonel Stewart has repeatedly acknowledged that he breached the rules and indicated remorse for his failures through his repeated apologies.

44. RECOMMENDATION

Colonel Stewart is eligible to hold a former Member’s parliamentary pass, allowing access to the parliamentary estate and some facilities. We recommend that that his pass be revoked with effect from the rising of the House for its Christmas recess.

45. RECOMMENDATION

Were Colonel Stewart still a Member of the House, taking into account the mitigating and aggravating factors, we would have recommended that he apologise on the floor of the House and be suspended from the service of the House for a period of no fewer than ten sitting days.

Appendix 1: Memorandum from the Parliamentary Commissioner for Standards: Colonel Bob Stewart MP

Summary

This memorandum reports on the inquiry that I began on 28 June 2023, following a self-referral from Colonel Bob Stewart MP on 21 June 2023. His self-referral followed an article published by openDemocracy on 21 June 2023 titled “*Tory MP hid directorship at defence firm while sitting on defence committee*”.

As the interests in question related to the period from 2010 to 2017 my inquiry focused on whether Colonel Stewart’s actions had breached the following:

Paragraph 16 of the 2009 Code:

Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members’ Interests and shall always draw attention to any relevant interest in any proceeding of the House or its Committees, or in any communications with Ministers, Government Departments or Executive Agencies.

Paragraph 13 of both the 2012 and 2015 Codes:

Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members’ Financial Interests. They shall always be open and frank in drawing attention to any relevant interest in any proceeding of the House or its Committees, and in any communications with Ministers, Members, public officials or public office holders.

My investigation involved interviewing Colonel Stewart, considering his written responses and taking written evidence from two witnesses. I also obtained and considered documentary evidence from openDemocracy.

A number of Colonel Stewart's responses to me were incomplete and inconsistent, and at times they directly contradicted other evidence I had obtained. On 26 February 2024 I therefore extended my inquiry to include a potential breach of paragraph 12 of the 2023 Code of Conduct:

Members must co-operate at all times with the Parliamentary Commissioner for Standards in the conduct of any investigation and with the Committee on Standards and the Independent Expert Panel in any subsequent consideration of a case.

Having considered the evidence, my findings are:

- a.** Colonel Stewart's registration of an employment with VES Consultancy in the Register of Members' Financial Interests was inaccurate in the following ways:
 - the name of the company paying for his services was wrong;
 - not all the payments he received were registered; and
 - the termination date of his involvement with the company was wrong.
- b.** Colonel Stewart failed to register his role with Ksantex S.à.r.l.
- c.** Colonel Stewart failed to register two payments from Ksantex S.à.r.l of £32,277.87 on 14 December 2015 and £41,385.20 on 18 September 2017; and
- d.** Colonel Stewart did not sufficiently cooperate with my inquiry, by failing to provide accurate and complete answers to my questions.

I am unable to make a finding as to whether Colonel Stewart should have declared his role with Ksantex S.à.r.l to the Defence Committee.

There are also various outstanding issues on which I have not been able to obtain clarity (see part 10 below).

In accordance with paragraph 43 of the Procedural Protocol, I consider that Colonel Stewart has breached the registration rules of the relevant Codes.

I have decided to refer this matter to the Committee for consideration; in my view it is not suitable for the rectification procedure for the following reasons:

- breaches of paragraph 12 cannot be rectified;
- the unregistered interests were not minor, and the registration breaches were not inadvertent; and

- Colonel Stewart’s apparent lack of care in complying with registration requirements showed significant lack of attention to the principles of openness and accountability underpinning the Code.

Daniel Greenberg CB
Parliamentary Commissioner for Standards
9 May 2024

Written evidence

1. Background to inquiry

1.1 openDemocracy published an article on 21 June 2023 entitled “*Tory MP hid directorship at defence firm while sitting on defence committee.*”⁵⁰ The article alleged that Colonel Stewart had failed to register a directorship of a company called Ksantex S.à.r.l (“Ksantex”) between February 2015 and July 2017 in the Register of Members’ Financial Interests (“the Register”). The article also claimed that Ksantex is “*a provider of defence equipment and advice*”.⁵¹ During this time, Colonel Stewart was a member of the House of Commons Defence Select Committee (“the Defence Committee”).

1.2 The Defence Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Ministry of Defence and its associated bodies. The Defence Committee consists of eleven Members of Parliament.⁵²

1.3 Following this article, Colonel Stewart referred himself to my office, writing:⁵³

I wish to refer myself to you because I omitted to register a change in the name of the Companies with which I was involved between 2012–2017. In 2015 my involvement changed from VES Consultancy to Ksantex SARL both in the same group of companies with the same boards.

At the time I mistakenly thought my original declaration in 2012 for VES Consultancy was good enough but I was wrong. My involvement with the group of companies was for business leadership training based on my book ‘Leadership under Pressure’ which was published in 2009. At no time did I play any part in either company’s decisions. I was a member of the Defence Committee at the time but the Company had no Defence interests.

50 Pages 78–82 of Evidence Bundle

51 Page 78 of Evidence Bundle

52 [Role of the Defence Committee](#)

53 Page 2 of Evidence Bundle

I made a mistake and of that I am guilty and am very sorry. For that reason I refer myself to you.

2. Scope of inquiry

2.1 I decided to open a formal inquiry under the Code of Conduct for Members of Parliament (“the Code”).

2.2 I wrote to Colonel Stewart on 28 June 2023⁵⁴ to inform him that an inquiry was being opened and that the inquiry would investigate and consider whether his actions had breached paragraph 13 of both the 2012⁵⁵ and 2015⁵⁶ Codes.

2.3 As the information available to me at the time reflected that Colonel Stewart’s roles were in place from 2012 to 2017, both the 2012 and 2015 Codes were relevant to my inquiry.

2.4 However, in his first response to me, Colonel Stewart advised that his role with VES Consultancy actually commenced in 2010 and not 2012, as he stated in his initial self-referral.⁵⁷ Consequently, my inquiry required application of the 2009 Code as well.⁵⁸

2.5 On 26 February 2024,⁵⁹ for reasons discussed below, I extended my inquiry to include a potential breach of paragraph 12 of the 2023 Code (cooperation with the Commissioner).⁶⁰

2.6 For the purposes of the inquiry as extended, I invited Colonel Stewart to attend a second interview on 19 March 2024.⁶¹

3. Evidence collected

3.1 Following a request from my office, openDemocracy provided me with the documentation and evidence that they had collected while investigating for their article on 5 July 2023.⁶²

3.2 On 6 July 2023 Colonel Stewart responded to my letter of 28 June 2023 providing information to assist my investigation.⁶³

54 Pages 3–8 of Evidence Bundle

55 [Code of Conduct 2012](#)

56 [Code of Conduct 2015](#)

57 Page 9 of Evidence Bundle

58 [Code of Conduct 2009](#)

59 Pages 52–54 of Evidence Bundle

60 [Code of Conduct 2023](#)

61 Pages 52–54 of Evidence Bundle

62 Pages 78–133 of Evidence Bundle

63 Pages 9–14 of Evidence Bundle

3.3 I interviewed Colonel Stewart on 22 August 2023.⁶⁴

3.4 I made requests for further information to Colonel Stewart on a number of separate occasions and he responded to those requests.⁶⁵

3.5 At Colonel Stewart's request, his colleague Dr Reza Tabrizi sent me a letter dated 1 September 2023.⁶⁶

3.6 I requested information from the current CEO of Ksantex,⁶⁷ who responded on 15 November 2023.⁶⁸

3.7 On 1 February 2024 I wrote to Colonel Stewart sharing my draft memorandum along with the written evidence on which I relied. The purpose of this was for Colonel Stewart to make any comments on the factual accuracy of the document.

3.8 Colonel Stewart responded on 16 February 2024.⁶⁹

3.9 As Colonel Stewart's comments included what appeared to be potentially significant contradictions of his earlier evidence, I extended the inquiry to include consideration whether his behaviour was contrary to his obligations to cooperate with my inquiries under paragraph 12 of the Code. I interviewed Colonel Stewart again on 19 March 2024,⁷⁰ with a view to revising the draft report.

3.10 On 29 April 2024 I provided Colonel Stewart with a second draft of my memorandum to make any comments on the factual accuracy of the document. Colonel Stewart responded on 8 May 2024.⁷¹ In his response, Colonel Stewart said he "*never for a moment thought Ksantex was a Defence related company and thus felt no requirement to declare it as such in the Defence Committee.*" Colonel Stewart fully accepted that he was at fault for not declaring his association with Ksantex in 2015 adding that it was a mistake and that he gained nothing from the omission. Colonel Stewart said his answers to my questions had been given in good faith and were also what he believed at the time. He said that he had no intention of breaching the Nolan Principles and no wish to mislead in any interviews. Colonel Stewart concluded his letter with an apology for the trouble he had caused.

3.11 A timeline of my investigation is attached at Appendix 1.

64 Pages 16–28 of Evidence Bundle
65 Pages 3–67 of Evidence Bundle
66 Pages 68–69 of Evidence Bundle
67 Pages 70–71 of Evidence Bundle
68 Pages 72–77 of Evidence Bundle
69 Page 49 of Evidence Bundle
70 Pages 55–67 of Evidence Bundle
71 Page 135 of Evidence Pack

4. Agreed facts

4.1 At the conclusion of the investigation the following facts appear to be agreed:

- Colonel Stewart held a role with a company associated with Mr Khagani Bashirov, for which he was paid £3000 per month;
- Colonel Stewart held a role with Ksantex from February 2015 until sometime in 2017;
- Colonel Stewart received £32,277.87 on 14 December 2015 and £41,385.20 on 18 September 2017 into his bank account, in each case in respect of his role with Ksantex;⁷²
- VES Consultancy and Ksantex are both controlled by Mr Bashirov; and
- Colonel Stewart was a member of the Defence Committee from 12 July 2010 to 3 May 2017.

5. Relevant provisions of Code of Conduct

5.1 My inquiry focused on whether Colonel Stewart had breached the following:

Paragraph 16 of the 2009 Code,⁷³ which states:

Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Interests and shall always draw attention to any relevant interest in any proceeding of the House or its Committees, or in any communications with Ministers, Government Departments or Executive Agencies.

Paragraph 13 of the Guide to the Rules which states:

... After the initial publication of the register (or, in the case of Members returned at by-elections, after their initial registration) it is the responsibility of Members to notify changes in their registerable interests within four weeks of each change occurring.

Paragraph 13 of both the 2012⁷⁴ and 2015⁷⁵ Codes, which state:

72 Page 134 of Evidence Bundle

73 [Code of Conduct 2009](#)

74 [Code of Conduct 2012](#)

75 [Code of Conduct 2015](#)

Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. They shall always be open and frank in drawing attention to any relevant interest in any proceeding of the House or its Committees, and in any communications with Ministers, Members, public officials or public office holders.

5.2 The following extracts included in the Guide to the Rules are also relevant:

Paragraph 83 of the Guide to Rules 16 April 2012:

“When a member of a Committee, particularly the Chairman, has a financial interest which is directly affected by a particular inquiry or when he or she considers that a personal interest may reflect upon the work of the Committee or its subsequent Report, the Member should stand aside from the Committee proceedings relating to it.”

“before proceeding to business after the election of the Chairman, the Chairman of the Committee should invite all members of the Committee to declare any interests they may have which relate to the terms of reference of that Committee, or which are likely to be relevant to a substantial part of the work which the Committee may be expected to undertake”.

The Guide to the Rules 14 April 2015 states as follows:

OCCASIONS WHEN DECLARATION IS REQUIRED

7. Subject to paragraphs 1 to 6 of this chapter, Members must declare a relevant interest:

c) In Select Committees:

i) at the Committee's first meeting. Members must provide details of any registered financial interests, and of any non-registrable interests which meet the test of relevance.[54] These are circulated under the authority of the Chair (if elected by the House) or in other cases the senior Member before the Committee's first meeting. Members who do not attend the Committee's first meeting must make their declaration at the beginning of the first meeting they do attend;

ii) when the Committee is deciding on the subject of an inquiry;

iii) at the beginning of any inquiry to which their interest particularly relates;

iv) at sessions of evidence, and in any hearings involving witnesses to whom the interest is particularly relevant and before any questions which might reasonably be thought by others relevant to that interest.

These declarations will be recorded in the Committee's proceedings.

If the subject matter of the inquiry is of direct concern to an outside body in which a Member has a financial interest, he or she must consider whether it is proper to take part in the inquiry without conflict of interest, and whether it is possible to participate effectively in the inquiry without crossing the borderline into paid advocacy. And a Member who has a personal interest which may reflect upon the work of the Committee or its report should stand aside from the Committee proceedings relating to it.

5.3 The test of relevance is explained in the Guide to the 2012 Code as follows:

74. It is the responsibility of the Member, having regard to the rules of the House, to judge whether a financial interest is sufficiently relevant to a particular debate, proceeding, meeting or other activity to require a declaration. The basic test of relevance should be the same for declaration as it is for registration of an interest; namely, that a financial interest should be declared if it might reasonably be thought by others to influence the speech, representation or communication in question. A declaration should be brief but should make specific reference to the nature of the Member's interest.

Paragraph 12 of the 2023 Code⁷⁶ states:

Members must co-operate at all times with the Parliamentary Commissioner for Standards in the conduct of any investigation and with the Committee on Standards and the Independent Expert Panel in any subsequent consideration of a case.

6. Points to establish

6.1 I undertook relevant enquiries to resolve the following:

- a.** Did Colonel Stewart accurately register his role with VES Consultancy?
 - Was the start date of the role correct?
 - Was the correct employer registered?

- Were all the payments received from this company registered accurately?
- Was the role removed from the Register at the right time?
- If the answer to any of the above is ‘no’ then Colonel Stewart has breached the Code in relation to the registration rules.
- b.** Should Colonel Stewart have registered his role with Ksantex and the payments he received?
 - If the answer to this is ‘yes’ then Colonel Stewart has breached the Code of Conduct in relation to the registration rules.
- c.** Was Colonel Stewart required to declare his role with Ksantex to the Defence Select Committee?
 - If the answer to this is ‘yes’ then Colonel Stewart has breached the Code of Conduct in relation to the declaration rules.
- d.** Has Colonel Stewart cooperated with my inquiry?
 - If the answer to this is ‘no’ then Colonel Stewart has breached paragraph 12 of the 2023 Code of Conduct.

7. Registration - Position with VES Consultancy

7.1 Colonel Stewart, registered his role with VES Consultancy on the Register as follows:⁷⁷

Provision of leadership/planning training and advice for VES Consultancy (UK) Ltd 30 Borough High St London SE1 1XU for one year from 1 July 2010, for which I am paid a retainer of £3,000 a month.

Received £3,000 for two meetings in July 2010. Hours 4 days (Registered 22 July 2010)

(a) Was the start date of the role correct?

7.2 In his initial self-referral email, Colonel Stewart told me that he was involved with VES Consultancy from 2012 to 2015.⁷⁸ In his response letter to me dated 6 July 2023, Colonel Stewart told me that he became involved with VES Consultancy in July 2010 and that his involvement ended in October 2011.⁷⁹

⁷⁷ [Register of Members' Financial Interests as at 6 September 2010](#)

⁷⁸ Page 2 of Evidence Bundle

⁷⁹ Pages 9–11 of Evidence Bundle

7.3 When asked about the discrepancies with the dates, Colonel Stewart explained that he had made an error in his initial self-referral email.⁸⁰

7.4 Even though Colonel Stewart provided two different dates for starting this role, there is no supporting evidence to suggest the commencement date of Colonel Stewart's role was inaccurately registered.

7.5 I find on the balance of probabilities that the correct start date was registered by Colonel Stewart.

(b) Was the correct employer registered?

7.6 A review of the company's profile on Companies House shows that VES Consultancy was dormant for the year ending 31 October 2009 up to 31 October 2012.⁸¹

7.7 Mr Bashirov in his interview with openDemocracy stated, *"It should also be noted that VES Consultancy UK Ltd had no activity. It has always remained inactive. Banking and accounting records can easily prove this."*⁸²

7.8 When asked about this Colonel Stewart stated *"... I gather that my payments from VES Consultancy were from VES Azerbaijan. This entity is not a dormant company and continues to this day."*⁸³

7.9 I was unable to find any substantial information on VES Azerbaijan and therefore requested further clarification from Colonel Stewart. Following enquiries he made with Mr Bashirov, he confirmed *"I am told that I was paid by Vnesh Expert Services (VES) which was registered in Azerbaijan in 1991 and it is still active VES specialises in consultancy, registration of companies and translation."*⁸⁴ Colonel Stewart provided an email from Mr Bashirov confirming this information.⁸⁵

7.10 I was unable to find any further information about Vnesh Expert Services, save for a website,⁸⁶ and I therefore pressed Colonel Stewart for more information.⁸⁷ Colonel Stewart responded as follows *"Vnesh Expert Services was registered in Azerbaijan. I believe that happened in 1994. I also understand the company provided registration and translation services."*⁸⁸

80 Page 16 of Evidence Bundle

81 [V.E.S Consultancy \(UK\) Ltd](#)

82 Page 91 of Evidence Bundle

83 Page 29 of Evidence Bundle

84 Page 42 of Evidence Bundle

85 Page 44 of Evidence Bundle

86 [VneshExpertService LLC EN](#)

87 Page 45 of Evidence Bundle

88 Page 47 of Evidence Bundle

7.11 When asked whether Mr Bashirov is connected to Vnesh Expert Services, Colonel Stewart stated that Mr Bashirov was the founder of Vnesh Expert Services but, in his email to me dated 29 January 2024, said that he was unable to provide any documentation to support this.⁸⁹ However in an email to Colonel Stewart dated 1 December 2023⁹⁰ Mr Bashirov states:

... You provided your services to VES, as a group and the payments were arranged by our offices in Baku. Vnesh Expert Services was registered in 1991 and it is still one of the most successful Azeri companies.

7.12 Colonel Stewart did not agree that he had breached the registration rules by registering the wrong employer but provided no explanation for this position; however, he did apologise in the event that the rules had been breached.⁹¹

7.13 When asked how he was paid during this period by a dormant company, Colonel Stewart initially responded that he gathered the payments were from VES Azerbaijan. However, when asked for further clarification Colonel Stewart provided a different response, that he was actually paid by Vnesh Expert Services.⁹² It is clear that Colonel Stewart's Register entry is inaccurate as it states he was paid by VES Consultancy (UK) which is wrong according to his own evidence.

7.14 I find that the correct employer was not registered.

(c) Were all the payments received from this company registered accurately?

7.15 Colonel Stewart registered the following payments from VES Consultancy:⁹³

Received £3,000 for two meetings in July 2010. Hours 4 days (Registered 22 July 2010)

Received £3,000 for three meetings. Hours: 8 hrs. (Registered 13 September 2010)

Received £3,000 on 1 October 2010 for two meetings. Hours: 4hrs. (Registered 27 October 2010)

7.16 Colonel Stewart told me that he received a payment of £3,000 per month for the duration of his role with VES Consultancy.⁹⁴

89 Page 47 of Evidence Bundle

90 Page 44 Of Evidence Pack

91 Page 47 of Evidence Bundle

92 Pages 42 and 44 of Evidence Bundle

93 [Register entry 19 July 2011](#)

94 Page 47 of Evidence Bundle

7.17 The last payment from VES Consultancy was registered on 27 October 2010.

7.18 Colonel Stewart confirmed that he received payments until October 2011, when the role ended.⁹⁵

7.19 He was unable to explain why the payments were not all registered and why no payments were registered after 27 October 2010.⁹⁶ When pressed, Colonel Stewart stated that he thought all the payments had been registered but if not, he accepted he was at fault and apologised.⁹⁷

7.20 In accordance with Colonel Stewart's own evidence, not all the payments he received have been registered. The Register clearly shows registration of three payments only. In 2010–2011 Members had to register individual payments received within 28 days of receipt.⁹⁸ Consequently, the rules required each individual payment received by Colonel Stewart to be registered.

7.21 I accept that Colonel Stewart's Register entry indicated that he would be paid on a monthly basis but I find that all the payments received for this role have not been registered as required by the rules.

(d) Was the role removed from the Register at the right time?

7.22 The role remained on the Register until March 2012.⁹⁹

7.23 Colonel Stewart's evidence is that his involvement with the company ended in October 2011, but he was unable to explain why the role remained in the Register until 5 March 2012, and what eventually prompted its removal.¹⁰⁰

7.24 Colonel Stewart agreed that his failure to remove the Register entry within the permitted 28 days was a breach of the registration rules.¹⁰¹

7.25 Colonel Stewart confirmed that his involvement with the company ended in October 2011, and in accordance with the rules this change should have been registered within 4 weeks. However, the role remained on the Register until March 2012.

7.26 I find that the role was not removed from the Register at the right time.

(e) Colonel Stewart's position on the VES registration issue

95 Page 9 of Evidence Bundle

96 Pages 16–17 of Evidence Bundle

97 Page 47 of Evidence Bundle

98 Paragraph 24 of the 2009 Code of Conduct Guide

99 Appears in Register of 5 March 2012 but does not appear in Register of 12 March 2012

100 Page 43 of Evidence Bundle

101 Page 47 of Evidence Bundle

7.27 Colonel Stewart accepts my finding that he failed to register this role accurately in the following way:¹⁰²

- *The end date of his involvement with the company was wrong.*

7.28 In his letter dated 29 January 2024 Colonel Stewart said that he did not believe he breached the Code in the following ways, but said if he had breached the Code he apologised:¹⁰³

- The name of the company paying for his services was wrong.
- All the payments he received were not registered.

7.29 *Despite this, for the reasons given above my findings are that Colonel Stewart has breached the registration rules in relation to the VES role in the ways set out above.*

8. Registration - Position with Ksantex

(a) Should Colonel Stewart have registered his role with Ksantex and the payments he received?

8.1 Colonel Stewart told me that he was involved with Ksantex from February 2015 to September 2017.¹⁰⁴ He initially told me that he received remuneration of £3,000 per month.¹⁰⁵ However, having put the evidence from the current CEO of Ksantex to Colonel Stewart showing that he was paid €45,600 in December 2015, Colonel Stewart then confirmed he received an annual payment of €45,600.¹⁰⁶ However during his interview on 19 March 2024, Colonel Stewart provided his bank statements which confirmed he received two payments of £32,277.87¹⁰⁷ on 14 December 2015 and £41,385.20¹⁰⁸ on 18 September 2017¹⁰⁹ for his role with Ksantex, to provide “*leadership and decision-making lectures*”.¹¹⁰

8.2 Colonel Stewart was registered on the Luxembourg Business Register as an Administrative Manager with Ksantex on 26 February 2015. His contact address is recorded as the House of Commons.¹¹¹

102 Pages 43 and 47 of Evidence Bundle

103 Page 47 of Evidence Bundle

104 Page 10 of Evidence Bundle

105 Page 47 of Evidence Bundle

106 Page 47 of Evidence Bundle

107 [Exchange rate](#) €1 = £0.7251

108 [Exchange rate](#) €1 = £0.8794

109 Page 57 and 134 of Evidence Bundle

110 Page 10 of Evidence Bundle

111 Page 14 of Evidence Bundle

8.3 Documents sent by the current CEO of Ksantex, show that Colonel Stewart resigned as a director of the company on 8 June 2017.¹¹²

8.4 Colonel Stewart told me that he never signed a contract with Ksantex or agreed a job description.¹¹³

8.5 Colonel Stewart is clear that his only role with Ksantex was to make presentations and he had no decision-making powers.¹¹⁴

8.6 Mr Bashirov described Colonel Stewart's role as a "*non-executive director*".¹¹⁵

8.7 Both Mr Bashirov and the current CEO of Ksantex confirm that Colonel Stewart was appointed to the Board.¹¹⁶

8.8 Colonel Stewart accepted that this role should have been registered but never was.¹¹⁷ He stated it was an oversight, and that he thought it may have been the irregularity of the payments that led to him failing to register the role.¹¹⁸

8.9 The role with Ksantex should have been registered in accordance with the relevant registration rules and it was not, irrespective of the nature of the role.

8.10 I have accepted Colonel Stewart's final account that he was paid £32,277.87 on 14 December 2015 and £41,385.20 on 18 September 2017 as it was supported by bank statements. In accordance with the rules, these payments should have been registered.

8.11 By failing to register this role throughout its duration, and the payments received for this role, Colonel Stewart accepted that he breached both the 2012 and 2015 Code.

8.12 Colonel Stewart told me that his failure to register this role was an oversight on his part and he cannot provide any explanation for this.

8.13 My finding is that this role and the payments received should have been registered.

112 Page 77 of Evidence Bundle

113 Page 27 of Evidence Bundle

114 Pages 31, 42–43 of Evidence Bundle

115 Page 44 of Evidence Bundle

116 Pages 72 and 92 of Evidence Bundle

117 Page 11 of Evidence Bundle

118 Page 55 of Evidence Bundle

9. Declaration

9.1 The question to determine in relation to declaration is whether Colonel Stewart was required to declare his role with Ksantex to the Defence Committee.

9.2 Colonel Stewart served on the Defence Committee from 12 July 2010 to 3 May 2017.¹¹⁹

9.3 Colonel Stewart told me that *“Neither VES Consultancy nor Ksantex SARL had or have had any involvement with Defence matters during my period of working for them to the best of my knowledge. Certainly, I did not think my work with them impacted on any Defence matter.”*¹²⁰

9.4 I have had sight of an archived homepage of Ksantex’s website. The following image was captured on 10 January 2016, which was during Colonel Stewart’s involvement with the company.

119 Bob Stewart MP for the Beckenham Constituency [website](#)

120 Page 11 of Evidence Bundle

ksantex Services Products Brands Contact us

Founded in 2012, KSANTEX provides a wide range of technologies, tactical equipment and services across a number of business sectors specifically designed to assist and support companies operating in our regions. Headquartered in Luxembourg, Ksantex has its key offices located in London and Baku with representational offices in Kazakhstan, Moldavia, Belarus, Russia and Georgia.

SERVICES

01. Technical and Commercial Support
02. Production and Creation Management
03. Assistance
04. Recruitment and Self-Defense Training System
05. Decoration, Medals, Insignia

PRODUCTS

- Selected Tactical Equipment
- Encrypted Technology
- Recording Systems
- Lightening Systems
- Tactical Optics
- UAVs
- Belts

BRANDS

Arthus-Bertrand
suprabeam®
CONDOR

9.5 Ksantex also registered a change of purpose on the Luxembourg Business Register, on 20 March 2017.¹²¹ Again, this was during Colonel Stewart's involvement with the company. The company changed its purpose from:

"The company's purpose shall be the provision of services in support, assistance and advice to companies and international project management particularly in civil engineering, transport, telecommunications and civil aviation."

to include:

"The company's purpose shall also be the wholesale and retail of all articles of sporting equipment, tactical equipment or professional clothing intended for security or defence." (my emphasis)

9.6 Documents provided by openDemocracy include a response received from Mr Bashirov. Mr Bashirov explained that *"Ksantex has never sold or bought military equipment. It is a consulting company in the field of civil and military radars."*¹²²

9.7 Dr Reza Tabrizi wrote to me in support of Colonel Stewart. He emphasised that Ksantex was not involved in any defence work. He confirms that *"[t]hey were trying to secure projects such as construction of airports, runways, control towers, and secure contracts for bodycams."*¹²³

9.8 I asked Colonel Stewart if he had looked at the website at any time and he told me that he had not.¹²⁴ I also enquired as to whether he was aware that Ksantex had changed its purpose in March 2017, and again Colonel Stewart confirmed he had not been aware of this registration change.¹²⁵

9.9 Colonel Stewart was presented with both a copy of the website homepage and the company's change of purpose registration during his interview with me. He told me that despite the website and the company's purpose strongly suggesting Ksantex was involved in defence, he was sure that they had no links to defence work whatsoever. He stated, *"... it was nothing to do with defence."*¹²⁶

9.10 Colonel Stewart confirmed that he had carried out limited checks in relation to both VES Consultancy and Ksantex prior to accepting a position with both companies.¹²⁷

121 Page 111 of Evidence Bundle
122 Page 93 of Evidence Bundle
123 Page 69 of Evidence Bundle
124 Page 19 of Evidence Bundle
125 Page 19 of Evidence Bundle
126 Page 23 of Evidence Bundle
127 Pages 18–20 of Evidence Bundle

9.11 During his interview Colonel Stewart confirmed that he had read and was aware of the declaration requirements.¹²⁸ However, his position is that as Ksantex were not involved in defence, the “*test of relevance*” was not met. He explained that he had spoken to members of the Defence Committee at the time who confirmed declaration was not required. He also told me that he spoke to representatives of Ksantex at the time who told him that the company had no links to the defence sector. Colonel Stewart was not able to provide me with any details about the individuals he spoke to.¹²⁹

9.12 Colonel Stewart explained that his work with both companies involved providing leadership seminars. He clarified that it was not necessary to have any awareness of the company’s business activity in order to provide these seminars as most of his material was based on his own experiences.¹³⁰

9.13 When asked how Colonel Stewart expected to meet his declaration or registration obligations when no research about the company employing him had been carried out, he was unable to answer this and stated “... *I knew they weren’t anything to do with defence that’s why*”.¹³¹

9.14 The declaration obligations are clear. Any Member who receives a financial interest that *might reasonably be thought by others to influence their representation in question, must declare that interest. In relation to Select Committees, the requirement for declarations is clearly explained in the Guide.*

9.15 The following evidence suggests Ksantex may have been involved in defence:

- The website depicts defence images.
- The change of purpose registered by the company clearly shows the company’s business activity involved equipment for the purposes of defence.
- Mr Bashirov confirms that they had some involvement with military radars.
- Dr Tabrizi states that the company were involved with contracts for bodycams.

I did not see evidence that Ksantex had entered into defence contracts.

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129 Pages 24–25 of Evidence Bundle

130 Page 19 of Evidence Bundle

131 Page 24 of Evidence Bundle

9.16 I am not required to make a finding as to whether Ksantex was involved in defence or what Colonel Stewart knew about the nature of Ksantex's business. I only need to be satisfied that the test of relevance was met in relation to his role requiring him to make a declaration to the Defence Committee. The judgment on the test of relevance is for the Member, however in making that judgment, the Member needs to be able to assess if the interest might reasonably be thought by others to influence the speech, representation or communication in question. The Member cannot make that assessment if they are only in possession of very limited information on the nature of the employer company.

9.17 Colonel Stewart states that he did not need to declare his financial interest with Ksantex to the Defence Select Committee as the company was not involved in defence and as even if they were he was not aware of any connection. Colonel Stewart did not believe a declaration was necessary.¹³²

9.18 Colonel Stewart has been able to give me very limited information about the nature of Ksantex's business. Despite significant efforts, I have been unable to find out any substantial information about what Ksantex was involved with at the time of Colonel Stewart's appointment. Without this information it is not possible for me to assess whether Colonel Stewart had made the right decision when he applied the test. Consequently, I am unable to make a finding as to whether Colonel Stewart breached the Code of Conduct in relation to the declaration rules.

10. Cooperation with my inquiry

(a) Introduction

10.1 During the course of the investigation, Colonel Stewart provided evidence which was incomplete, inconsistent, and at times in direct contradiction to other evidence. In view of this I extended my inquiry to consider Colonel Stewart's cooperation.

(b) VES Consultancy

10.2 In his letter of self-referral, Colonel Stewart told me that he was employed by VES Consultancy (UK) Ltd. between 2012 to 2015.¹³³ Then in his subsequent letter of 6 July 2023 he told me that he was initially incorrect and that his involvement with VES Consultancy (UK) Ltd. was between July 2010 and October 2011.¹³⁴ Colonel Stewart has failed to provide any evidence to confirm the start and end dates of his employment.

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133 Page 2 of Evidence Bundle

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10.3 In his letter dated 6 July 2023, Colonel Stewart said he was employed and paid by VES Consultancy (UK) between July 2010 and October 2011.¹³⁵ When informed that VES Consultancy (UK) was a dormant company during his tenure, Colonel Stewart informed me in writing on 1 September 2023 that he was in fact paid by VES Azerbaijan.¹³⁶ Having been unable to find any information about VES Azerbaijan I requested further clarification from Colonel Stewart who told me on 6 December 2023 that he was paid by a company called Vnesh Expert Services.¹³⁷

10.4 Contrary to Colonel Stewart's statement to openDemocracy that he was not aware of any connection between Mr Bashirov and both VES Consultancy and Ksantex,¹³⁸ in his interview with me on 22 August 2023, Colonel Stewart told me that Mr Bashirov had personally offered him both positions at VES Consultancy and Ksantex.¹³⁹

10.5 Colonel Stewart has provided two different dates for employment at VES Consultancy (UK) Ltd. yet has not been able to provide any documentary evidence categorically supporting any of the dates provided.

10.6 The role was registered until 5 March 2012. Colonel Stewart was not able to explain what prompted him to remove the role from the Register.

10.7 Despite being employed by a branch of VES Ltd for at least 15 months¹⁴⁰ Colonel Stewart was unable to provide any documentary evidence of the nature of the role or any expectations of him by his employer.

(c) Ksantex

10.8 During the course of my inquiry, Colonel Stewart amended his statement regarding the amount of remuneration he received from Ksantex. Colonel Stewart initially said he received £3,000 per month, then, after the current CEO of Ksantex provided me with a document relating to a payment of €45,600 for attendance fees appearing to be received by Colonel Stewart in December 2015,¹⁴¹ he confirmed that he received the higher sum.¹⁴² When asked about this Colonel Stewart explained he could not recall and apologised.¹⁴³ However, when pressed on this issue, Colonel Stewart accepted he had received the payment, but was not initially able to explain why he told me he could not recall this payment when previously asked.¹⁴⁴

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136 Page 29 of Evidence Bundle

137 Page 42 of Evidence Bundle

138 Pages 84 of Evidence Bundle

139 Pages 17, 42 and 47 of Evidence Bundle

140 Based on the dates July 2010 - October 2011 provided by Colonel Stewart on 6 July 2023

141 Page 73 of Evidence Bundle

142 Page 47 of Evidence Bundle

143 Page 48 of Evidence Bundle

144 Page 58 of Evidence Bundle

10.9 Then, having confirmed that he had been paid €45,600 per annum by Ksantex, and there was no additional payment,¹⁴⁵ Colonel Stewart provided his bank statements for the relevant period during the interview on 19 March 2024, these showed Colonel Stewart had in fact received two payments from Ksantex; £32,277.87 on 14 December 2015 and £41,385.20 on 18 September 2017.¹⁴⁶

10.10 Colonel Stewart stated he had given the wrong amount of £3000 per month as he had thought the payment from Ksantex was the same amount as that from VES Consultancy.¹⁴⁷ Colonel Stewart apologised and said he had not meant to mislead and was doing his best from memory several years after the event.

10.11 Colonel Stewart said that he was employed by Ksantex to provide “*leadership and decision-making lectures*”.¹⁴⁸ Colonel Stewart told me that he had provided approximately six or seven seminars annually,¹⁴⁹ and provided documentation which shows that he facilitated 16 seminars from 9 March 2015 to 17 July 2017, including a record of seminars for 4 April 2017, 5 June 2017 and 17 July 2017.¹⁵⁰ However, the current CEO of Ksantex said he was not aware of any seminars being provided by Colonel Stewart during his mandate, which commenced on 1 February 2017.¹⁵¹ Colonel Stewart said that he had no dealings with the current CEO of Ksantex and acted on instructions from Mr Bashirov.¹⁵²

10.12 When asked who attended the seminars provided during his tenure with both VES and Ksantex, Colonel Stewart, in his letter of 29 January 2024 stated that the attendees were attending remotely from Azerbaijan but he was unable to recall their names.¹⁵³ However, during the interview I conducted with Colonel Stewart on 22 August 2023, he had told me, “*Well, people come in we’d have a drink. We’d have coffee together, probably it might be in the boardroom of the office. And then we’d sit down and I say I’m gonna talk about decision making and then I put up the viewpoint and normally could be 120 photographs say. If you’re asking me for detail, it would be something like I’d use Bosnia as the case study.*”¹⁵⁴

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146 Pages 57 and 134 of Evidence Bundle
147 Page 55 of Evidence Bundle
148 Page 10 of Evidence Bundle
149 Page 20 of Evidence Bundle
150 Page 33 of Evidence Bundle
151 Page 72 of Evidence Bundle
152 Page 42 of Evidence Bundle
153 Page 47 of Evidence Bundle
154 Page 21 of Evidence Bundle

10.13 During his interview with openDemocracy, Mr Bashirov states that Colonel Stewart was on the board of directors and his duties were limited to consultancy.¹⁵⁵ He does not mention that Colonel Stewart was employed to provide seminars to his staff members.

10.14 Colonel Stewart has repeatedly told me that he only provided seminars for Ksantex and had no decision-making powers.¹⁵⁶ However, the current CEO of Ksantex provided documents signed by Colonel Stewart accepting the role of Administrative Manager for Ksantex on 3 February 2015, resigning his role as Administrative Manager on 8 June 2017 and in his capacity as an Administrative Manager on 10 December 2015.¹⁵⁷ Colonel Stewart was unable to account for this.

10.15 Despite formally resigning his post with Ksantex on 8 June 2017, Colonel Stewart told me that he had provided a seminar on 17 July 2017. When asked about this he stated that he was happy to do the seminars on a pro bono basis.¹⁵⁸

(d) Assessment

10.16 Although on the surface it appears that Colonel Stewart has cooperated with this investigation by responding within the deadlines set and attending two interviews, my view is that there has been a reluctance to fully engage with my inquiry. As shown above, responses have been contradictory, sparse or continually changing. This has not only prolonged the timeline of this investigation but has also changing. This has not only prolonged the timeline of this investigation but has also resulted in unanswered questions and gaps in the evidence. Although, some leeway can be given for the passage of time, the lack of inquiry or responsibility shown by Colonel Stewart is discouraging.

10.17 The obligation on a Member to co-operate at all times with the Parliamentary Commissioner for Standards in the conduct of an investigation is clear and unequivocal. During the course of my inquiry Colonel Stewart has repeatedly failed to provide accurate and complete information. Whilst it is not clear from the evidence whether the failings identified are deliberate or inadvertent, the number identified highlight Colonel Stewart's failure to undertake due diligence before responding to my inquires and in my view, demonstrates Colonel Stewart's failure to treat this investigation seriously and therefore his failure to cooperate with my investigation to the standard required by the Code.

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156 Pages 2, 21, 31, and 49 of Evidence Bundle

157 Pages 73-77 of Evidence Bundle

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11. The relevant Principles

11.1 As required by paragraph B of the Code, I have considered the Seven Principles of Public Life which underpin the Code as part of my deliberations. The principles that I believe are most relevant to this inquiry are:

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

12. My recommendations

12.1 It is not disputed by Colonel Stewart that his registration entry that recorded work with VES Consultancy was not registered correctly and so represented a breach of the relevant registration rules.

12.2 I find the following inaccuracies with Colonel Stewart's registration of this role:

- Colonel Stewart did not register all the payments he received.
- The role was not removed from the Register within the time limit set by the House.
- Colonel Stewart was not paid by VES Consultancy (UK) as registered.

12.3 My recommendation is that Colonel Stewart should be found to have breached the relevant registration rules in relation to his role registered with VES Consultancy.

12.4 It is not disputed by Colonel Stewart that he failed to register his role at Ksantex and the payments, and he accepts that this was a registrable interest. My recommendation is that it should be found that by failing to register this role and these payments, Colonel Stewart breached the relevant registration rules.

12.5 I am unable to make any recommendation as to whether Colonel Stewart should be found to have breached the relevant declaration rules by not declaring his role with Ksantex to the Defence Committee.

12.6 Colonel Stewart has repeatedly failed to provide accurate, reliable and complete information during the course of this inquiry, resulting in unnecessary delays and difficulties. My recommendation is that Colonel Stewart's actions should be found to have been a breach of paragraph 12 of the 2023 Code of Conduct.

13. Referral to the Committee

13.1 In accordance with paragraph 43 of the Procedural Protocol, I consider that Colonel Stewart has breached the registration rules of the relevant Codes and paragraph 12 of the 2023 Code of Conduct.

13.2 I have decided to refer this case to the Committee on Standards for a decision. In my view it is not suitable for rectification for the following reasons:

- breaches of paragraph 12 cannot be rectified;
- the registration breaches are not minor or inadvertent for the following reasons:
 - the payments received by Colonel Stewart from Ksantex were significant, and were not disclosed to my investigation by Colonel Stewart until a record of a payment was provided to me by the current CEO of Ksantex;
 - Colonel Stewart received these large payments from a company about which he says he had limited knowledge. There was no contract or document that detailed the purpose of these payments or the company's expectations. The Guide makes it clear that when registering an interest the Member is responsible for judging whether the relevant tests are met. Where a Member is unable to do this because they have not sought the information required to make that assessment, the failure to register cannot

be considered truly inadvertent. It is in a Member's own interest to make vigorous enquiries about companies offering them money for services in order that any questions raised about their conduct can be defended robustly in accordance with the principles of openness and accountability.

- although Colonel Stewart affirms that he did not receive any other payments from either VES or Ksantex which he failed to register, it is difficult to have confidence in this given that a payment of €45,600 only came to light when documentation was sent by the CEO of Ksantex, and the payments of £32,277.87 on 14 December 2015 and £41,385.20 on 18 September 2017 only came to light after I requested sight of his bank statements.
- Members are expected to fulfil conscientiously the requirements of the House in respect of the registration of interests. Colonel Stewart's actions fell far below the bar of conscientious fulfilment for the following reasons:
 - he had limited information about who was employing him (including not knowing that his payments for VES were in fact being made by a company called Vnesh Expert Services);
 - he had limited information about what was expected of him in relation to the payments from Ksantex;
 - he had limited information about the background of those heading the companies employing him and the nature of the business;
 - he has shown an extremely poor approach to record keeping; and
 - he had poor knowledge about his actual working title and whether he was a Director of Ksantex.
- Colonel Stewart, despite being a senior Member of Parliament, has failed conscientiously to consider the rules as set out in the Code of Conduct and apply them to his affairs; and
- Colonel Stewart has through his actions shown indifference to a number of the Nolan Principles as described above.

Daniel Greenberg CB
Parliamentary Commissioner for Standards
9 May 2023

Appendix 1: Timeline of my inquiry

Date	Event	# working days since previous action		
		1	2	3
21 June 2023	Colonel Stewart's self-referral received / openDemocracy publishes article			
28 June 2023	Colonel Stewart is notified of the start of my inquiry and information requested			5
4 July 2023	Request to openDemocracy for information		4	
5 July 2023	openDemocracy submits evidence		1	
6 July 2023	Colonel Stewart responds to my initial letter		1	
8 August 2023	Colonel Stewart informed of decision to interview him			23
22 August 2023	Interview with Colonel Stewart conducted	11		
30 August 2023	Interview transcript shared with Colonel Stewart, further question asked and information requested from Dr Reza Tabrizi			5
1 September 2023	Responses received from Colonel Stewart and Dr Tabrizi	2		
3 October 2023	Further information requested from Colonel Stewart			22
13 October 2023	Response received from Colonel Stewart		8	
24 October 2023	Information requested from CEO of Ksantex S.à.r.l		7	
15 November 2023	Response received from CEO of Ksantex S.à.r.l	17		
23 November 2023	Ksantex S.à.r.l information shared with Colonel Stewart and further information requested			6
6 December 2023	Response received from Colonel Stewart	9		
22 January 2024	Information requested from Colonel Stewart			30

Date	Event	# working days since previous action		
		1	2	3
29 January 2024	Response received from Colonel Stewart	5		
1 February 2024	Draft memorandum sent to Colonel Stewart for factual accuracy check			3
16 February 2024	Response from Colonel Stewart	11		
20 February 2024	Information requested from Colonel Stewart			2
20 February 2024	Response from Colonel Stewart	0		
26 February 2024	Colonel Stewart invited for a second interview			4
19 March 2024	Second interview with Colonel Stewart	16		
26 March 2024	Transcript of second interview sent to Colonel Stewart to check			5
2 April 2024	Transcript approved by Colonel Stewart	3		
29 April 2024	Second draft memorandum sent to Colonel Stewart for factual accuracy check			18
8 May 2024	Response from Colonel Stewart	6		
9 May 2024	Memorandum passed to the Committee on Standards			1

This investigation has taken 225 working days.

Of this:

- For 80 working days, PCS was awaiting responses and documentation from witnesses or the Member.
- For 21 working days, PCS was awaiting responses and documentation from witnesses or the Member whilst progressing other enquiries.
- For 124 working days, PCS was conducting investigative enquiries and drafting the memorandum.

¹. Awaiting response from member/witness.

². PCS progressing investigation and awaiting responses from Member/witnesses.

³. PCS progressing investigation.

Appendix 2: Written evidence to the Committee from Colonel Stewart

Colonel Rt Hon Bob Stewart DSO MP

House of Commons
London
SW1A 0AA

22nd May 2024

Clerk of the Committee on Standards and of Privileges
Journal Office House of Commons

Please may I submit this letter to the Committee on Standards and of Privileges. I will keep it short because I fully accept I made a mistake.

With regard to my work with KSantex, I never for a moment considered it to be, a Defence related company which it isn't. Thus, I did not think there was any need for me to declare my involvement with it to the Defence Committee.

However, I accept fully that I am at fault for not declaring my association with KSantex in 2015. I had worked for the same group of companies before and had declared that, albeit imperfectly. I cannot recall why I did not again. In truth there was nothing I would gain or lose by so doing. I made a careless mistake and not a deliberate one. I have never been great with my finances and have always rather lived day to day. Certainly I had no intention of breaching the Nolan Principles and my answers to the Commissioner for Standards were given in good faith and also what I believed to be the case at the time.

I am truly sorry, highly embarrassed and humiliated by what happened. I accept I was slipshod in my approach to registration of interests but it was a mistake of incompetence not deliberation. It has also borne heavily on me since I discovered my error, at a time when I have had many other worries. In truth, I am very sorry for my errors and apologise without reservation.

Finally, I stand ready to come before the Committee to answer for my mistakes should the Committee decide that be appropriate.

Yours faithfully
Bob Stewart

Formal minutes

Tuesday 3 December 2024

Members present:

Alberto Costa, in the Chair

Paula Barker

Mark Ferguson

Sir Francis Habgood

Dr Michael Maguire

Mehmuda Mian

Melanie Onn

Dr Rose Marie Parr

Anna Sabine

Victoria Smith

Gareth Snell

Dr David Stirling

Carys Williams

Sir Francis Habgood declared that he would take no further part in the inquiry.

Report consideration

Draft report (Bob Stewart), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 45 read and agreed to.

Two papers were appended to the Report.

Resolved, That the Report be the First Report of the Committee to the House.

None of the lay members present wished to submit an opinion on the Report (Standing Order No. 149(8)).

Ordered, That the Chair make the Report to the House.

The following written evidence was ordered to be reported to the House for publication:

Written evidence bundle from the Parliamentary Commissioner for Standards.

Adjournment

The Committee adjourned.