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From: STEWART, Bob
Sent: 21 June 2023 16:06
To: Standards Commissioner
Cc: HARRIS, Rebecca
Subject: REFERRING MYSELF TO YOU

Dear Commissioner,

I wish to refer myself to you because I omitted to register a change in 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.

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

Bob Stewart

Office of the Parliamentary Commissioner for Standards

Highly Restricted: Parliamentary Commissioner for Standards

Colonel Bob Stewart MP
House of Commons
London
SW1A 0AA

By email only

28 June 2023

Dear Colonel Stewart

On 21 June 2023 you wrote to me referring yourself in relation to a registration issue. I am writing now to confirm that I have decided to open a formal inquiry into the matter.

The scope of my inquiry

My inquiry will focus on your following roles:

- VES Consultancy – with whom you were involved from 2012 until 2015, according to your email.
- Ksantex SARL – with whom you were involved with from 2015 until 2017 according to your email.

I have reviewed your register entries and can confirm that you first registered a payment from VES Consultancy on 22 July 2010 which appears 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.

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

Any reference to this role remains in the register until 5 March 2012 with the last payment being received from VES Consultancy on 27 October 2010.

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

These entries do not appear to correlate with the contents of your email which states that you were involved with VES Consultancy from 2012 to 2015.

In addition, you state that your involvement with VES Consultancy changed to Ksantex SARL in 2015. You did not register this change or any involvement with Ksantex SARL. You explain that both VES Consultancy and Ksantex SARL are in the same group of companies with the same boards.

My inquiry will focus on whether you have breached the relevant registration rules.

¹ Register 13 January 2012

You were a member of the Defence Select Committee from 2010 to 2017. My inquiry will also focus upon whether appropriate declarations were made.

If the scope of my inquiry changes, I will update you in writing.

The relevant rules of the House

The overarching 2012 and 2015 rules are found in the [House of Commons Code of Conduct and Guide to Rules - UK Parliament](#). Paragraph 13 of the both the 2012 and 2015 Codes states:

'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.'

The 2015 Guide to the rules relating to the conduct of Members, which is appended to the Code, contains more detail about registration and declaration.

Chapter 1 states:

Requirements of the House

*"2. The House requires new Members, within one month of their election, to register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election. After that, Members are required to register within 28 days any change in those registrable interests. Such a change includes both the acquisition of a new interest and the ceasing of any registered interest, for example because an employment has ceased or because a holding has reduced in value or been sold."*²

Chapter 2 states:

REQUIREMENTS FOR DECLARATION

4. Members are required, subject to the paragraphs below, to declare any financial interests which satisfy the test of relevance, ...

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. These are circulated under the authority of the Chair (if elected by the

² [House of Commons - The Code of Conduct together with The Guide to the Rules relating to the Conduct of Members - House of Commons - The Code of Conduct \(parliament.uk\)](#)

*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;*³

The 2012 Guide to the rules relating to the conduct of Members, which is appended to the Code, contains more detail about registration and declaration.

Chapter 1 states:

RULES OF THE HOUSE

"For the purposes of the Resolution of the House of 22 May 1974 in relation of disclosure of interests in any proceeding of the House or its Committees, any interest declared in a copy of the Register of Members' Financial Interests shall be regarded as sufficient disclosure for the purpose of taking part in any division of the House or in any of its Committees."

*(Part of the Resolution of the House of 12 June 1975, amended on 9 February 2009)*⁴

DUTIES OF MEMBERS IN RESPECT OF REGISTRATION

13. Members of Parliament are required to complete a registration form and submit it to the Commissioner within one month of their election to the House (whether at a general election or a by-election). 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 registrable interests within four weeks of each change occurring.

*14. Any Member who has a registrable interest which has not at the time been registered, shall not undertake any action, speech or proceeding of the House (except voting) to which the registration would be relevant until he or she has notified the Commissioner of that interest.*⁵

Chapter 2 states:

RULES OF THE HOUSE

"In any debate or proceeding of the House or its Committees or transactions or communications which a Member may have with other Members or with Ministers or servants of the Crown, he shall disclose any relevant pecuniary interest or benefit of whatever nature, whether direct or indirect, that he may have had, may have or may be expecting to have."

*(Resolution of the House of 22 May 1974)*⁶

³ [House of Commons - The Code of Conduct together with The Guide to the Rules relating to the Conduct of Members - House of Commons - The Code of Conduct \(parliament.uk\)](#)

⁴ [House of Commons - The Code of Conduct together with The Guide to the Rules relating to the conduct of Members \(parliament.uk\)](#)

⁵ [House of Commons - The Code of Conduct together with The Guide to the Rules relating to the conduct of Members \(parliament.uk\)](#)

⁶ [House of Commons - The Code of Conduct together with The Guide to the Rules relating to the conduct of Members \(parliament.uk\)](#)

Next steps

I would welcome your comments on the allegation that your alleged actions have amounted to a breach of paragraph 13 of the 2012 or 2015 Code of Conduct for Members. I would also be grateful for your answers to the following specific questions:

1. Please tell me about your role with VES Consultancy, including the following:
 - a) How did you become involved with VES Consultancy?
 - b) When did you become involved with VES Consultancy?
 - c) When did you receive the first and last payment from VES Consultancy?
 - d) When did your role with VES Consultancy end?
 - e) What is VES Consultancy's nature of business?
 - f) What were you required to do for VES Consultancy?
 - g) Please provide a copy of the contract.
2. Please tell me about your role with Ksantex SARL including the following:
 - a) How did you become involved with Ksantex SARL?
 - b) When did you become involved with Ksantex SARL?
 - c) When did you receive the first and last payment from Ksantex SARL?
 - d) When did your role with Ksantex SARL end?
 - e) What is Ksantex SARL's nature of business?
 - f) What were you required to do for Ksantex SARL?
 - g) Please provide a copy of the contract.
3. Please advise if you made any declarations of your interests to the Defence Committee. Please provide a record of any declarations, in the form of those circulated by the chair.

It would be helpful to receive any evidence to support your responses when you reply to this letter. Any other points you wish to make to help me with this inquiry would also be welcome.

Important information

My inquiries are conducted in private. However, following the decision taken by the House on 21 April 2021, I will shortly publish on my webpages the fact that I am conducting an inquiry about your alleged breach of the Code of Conduct. If contacted, my office will not comment on any aspect of this specific inquiry to third parties. They will answer direct factual questions about the processes I follow, and the standards system more generally, but will not provide any comment or details about the particulars of this inquiry.

This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege. It should be kept confidential until the outcome of my inquiry is published.

The Members' Services Team (MST) can support and signpost you and/or your staff to appropriate support services. You can contact them confidentially on 020 7219 4141 or at mst@parliament.uk for a range of issues, including support with handling the impact of media attention.

Procedure

Please see attached the Procedural Protocol in relation to the Code of Conduct, which was approved by the House on 18 October 2022. This sets out detailed information about the House's standards procedures, including the investigation process that I follow.

While I do not, at this stage, know whether it will be necessary to interview you about this matter, it would be open to you to be accompanied at any such interview. I am, of course, very happy to meet with you at any stage if you would find that helpful.

I should say now, as a matter of courtesy, that I may seek the advice of the House authorities and others as part of this inquiry. If I do so, I will share that correspondence with you.

Information provided to me during the course of my inquiry will be retained, and disposed of, in accordance with the House of Commons' Authorised Records Disposal Policy.

Potential outcomes

Inquiries are generally concluded in one of three ways.

1. If the evidence does not substantiate the allegation, I will report that I consider there has been no breach of the Code. If the allegation is particularly serious or the investigation raises matters of wider interest or relevance, I may decide nevertheless to submit a memorandum to the Committee on Standards, which the Committee will consider and then submit its own report to the House.
2. If the evidence demonstrates a breach of the rules, I may, in circumstances defined by Standing Order No. 150, report that I consider there has been a breach of the Code, and conclude the inquiry using the rectification procedure, without making a referral to the Committee on Standards.

For inquiries that either result in a not upheld outcome or a rectification of the breach of the Rules, the investigation material, including our correspondence, will be published on the Parliament website, and the Committee will be notified.

3. If I consider there has been a breach of the Code, and
 - it is either unsuitable for the rectification procedure; or
 - you do not accept my opinion that there has been a breach of the Code; or
 - you do not take (or do not agree to take) any remedial action required; or
 - the investigation raises issues of wider importance

I must make a referral to the Committee on Standards. The Committee will then decide whether there has been a breach of the Code. My memorandum to the Committee will be published as an appendix to the Committee's own Report.

Regardless of the outcome of my inquiry, I must emphasise that all the relevant evidence, including our correspondence, will be published when this inquiry is concluded. I routinely redact the personal data of third parties unless it is relevant to my decision. Please tell me if you provide sensitive material that you think I should redact. I will consider carefully any such request.

Action

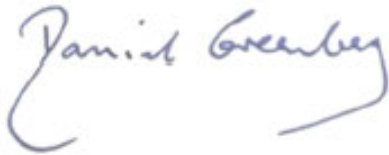
I would be grateful to have your response to this letter as soon as possible and no later than 4pm on 12 July 2023 please.

If you would prefer me to communicate with you by a different email address, please give the details when you reply to this letter. It would also be helpful if you were willing to provide a telephone number through which I might contact you.

I would be grateful if you could send your response electronically to standardscommissioner@parliament.uk.

Thank you for your cooperation with this matter.

Yours sincerely

A handwritten signature in blue ink that reads "Daniel Greenberg". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel Greenberg CB
Parliamentary Commissioner for Standards

Bob Stewart DSO MP
House of Commons
London
SW1A 0AA

Daniel Greenberg CB
Parliamentary Commissioner for Standards

6 July 2021

Dear Commissioner.

I write in reply to your letter to me dated 28 June 2023 with responses as you requested.

I will explain my involvement with two companies:

- VES Consultancy.
- Ksantex SARL.

Although I was involved with VES Consultancy for a year in 2010, I was not involved with the company from October 2011 until 2015. Obviously, I knew the company continued in existence but I received no monies or indeed had contact with it. My previous suggestion that I had was erroneous.

With regard to the specific questions, you asked me on my involvements I answer as follows.

1. My role with VES Consultancy.

a. How did I first become involved with VES Consultancy?

In 2005, before I was an MP, I was hired to accompany the leader of Azerbaijan's Democratic Party, Rasul Guliyev, to Azerbaijan to give advice as to how he could be elected to his country's Parliament. In the event President Aliyev stopped our entry to Azerbaijan. We were forced to land at Simferopol in the Crimea and then return to UK. I held a news conference in Simferopol. It was widely reported on BBC too. Then in 2010 Khagani Bashirov, the owner of VES Consultancy, who had watched what happened at the press conference suggested I gave his company executives some leadership training. I had produced a book on business leadership in 2009 which he had also seen and liked.

b. When did I become involved with VES Consultancy?

I first became involved with VES Consultancy in July 2010.

c. When did I receive the first and last payments from VES Consultancy?

From July 2010 – October 2011.

d. When did my involvement with VES Consultancy end?

October 2011.

e. What was VES Consultancy's nature of business?

Registration of companies, preparing documents for notary public purposes and translation of documents, I was not involved in the business though.

f. What was I required to do for VES Consultancy?

I gave occasional lectures on leadership and decision-making based on the principles I outline in my book 'Leadership under Pressure' which was published in 2009.

g. Was there a contract?

I never signed a contract, and my involvement was informal until they no longer wanted me.

2. My role with KSantex SARL.

a. How did I become involved in KSantex SARL?

The Group Chairman, Khagani Bashirov, requested that I do some more leadership training along the lines I had done previously for VES Consultancy.

b. When did I become involved with KSantex SARL?

February 2015.

c. When did I receive the first and last payments from KSantex SARL?

February 2015 – September 2017.

d. When did my role in KSantex SARL end?

September 2017.

e. What was KSantex SARL's nature of business?

Consultancy and construction contracts.

f. What was I required to do for KSantex SARL?

Provide leadership and decision-making lectures.

g. Copy of Contract?

See attached contract.

Summary

I am sorry. Clearly, I should have particularly registered my involvement with KSantex SARL and I was wrong not to have done so. Thinking back, I must have believed I had done so but clearly I did not. I am certainly at fault, and I fully accept and apologise for 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. 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.

A handwritten signature in black ink that reads "Bob Stewart". The signature is written in a cursive style, with the first letter of each word being capitalized and prominent.

Bob Stewart

KSANTEX S.à.r.l.

Limited liability company

Head office: [REDACTED]
[REDACTED]

RCS Luxembourg: B 152.619

Registered capital: 12,500 euros

**RESOLUTIONS OF THE SOLE SHAREHOLDER
OF 26 FEBRUARY 2015
NO. /2015**

In the year two thousand and fifteen, on the twenty-sixth of February.

Before Us, [REDACTED] notary residing in Luxembourg, Grand
Duchy of Luxembourg.

Appeared:

IMMO PROPERTY S.A., public limited liability company governed by
Luxembourgish law, having its registered office at [REDACTED]
[REDACTED], registered with the Luxembourg Trade and Companies Register under number B
180.701, here represented by [REDACTED] private employee, residing
professionally at [REDACTED] by virtue of a power of
attorney privately established on 25 February 2015.

The power of attorney signed "*ne varietur*" by the party appearing and the
undersigned notary shall remain annexed to the present act and shall be formally
registered with it.

That party appearing is the sole partner (the "Sole Shareholder") of the company
KSANTEX S.à.r.l (the "Company"), a limited liability company with head office located at
[REDACTED] incorporated as recorded in a deed
established by the notary [REDACTED] notary resident in Luxembourg, on 20 April
2010, published in Mémorial C, Compendium of Companies and Associations, of 1 June
2010 under number 1140. The company statutes were modified most recently as recorded
in a deed established by [REDACTED] notary resident in Luxembourg, on 7
May 2014, published in Mémorial C, Compendium of Companies and Associations, of 22
July 2014 under number 1908.

The Sole Shareholder, representing the entirety of the share capital, takes the
following resolutions.

FIRST RESOLUTION

The Sole Shareholder decides to modify the Company's purpose and, consequently, to modify article 4 of the statutes as follows:

“Art. 4. 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.

The company's purpose shall also be any provision of services in the area of communication by means of objects and images and via all media outlets.

It may carry out all operations relating directly or indirectly to the acquisition of holdings in any form whatsoever, in any company taking the form of a capital company or partnership, as well as the administration, management, control and development of those holdings.

It may in particular use its funds for the creation, management, enhancement and liquidation of a portfolio composed of all securities, participate in creation, development and control, acquire by way of contribution, subscription, underwriting or call option and in any other manner all securities, realise them by means of sale, transfer, exchange, grant any assistance, loans, advances or guarantees to any company in which it has a direct or indirect interest. It may acquire, develop, receive and license patents, brands and other industrial property rights.

The company may manage its own property assets through purchase, rental, development and the sale of any property and property rights.

In general, the company may carry out all other commercial, industrial, financial, security and property transactions directly or indirectly connected with its purpose or likely to assist its operation and development.”

WARNING

The notary advised the party appearing of the fact that before any commercial activity of the Company whose purpose is hereby modified, they must be in possession of a trading permit in due form relating to the company's purpose, which the party appearing expressly acknowledged.

SECOND RESOLUTION

The Sole Shareholder decides to modify article 11 of the company's statutes in order to introduce the concepts of technical manager and administrative manager and in consequence to modify the signing authority, in such a way that henceforward article 11 will have the following content:

“Art.11 The Company is managed by one or more managers named by a resolution of the shareholders, which sets the duration of their mandate. The managers are not necessarily shareholders.

The managers may be dismissed at any time, with or without reason, by a decision of the shareholders.

If several managers are named, they shall form the management board (the **Board**). The shareholders may decide to name technical managers and administrative managers of two different classes, that is, one or more technical managers and one or more administrative managers.

The Company is considered to have entered into an undertaking in respect of a third party either by the individual signature of the technical manager, or by the joint signature of a technical manager and an administrative manager.

The Company is also considered to have entered into an undertaking in respect of a third party by the signature of any person to whom the Board has delegated special powers.”

THIRD RESOLUTION

The Sole Shareholder decides to redefine the current sole manager [REDACTED] as technical manager.

FOURTH RESOLUTION

The Sole Shareholder decides to name the following persons as administrative managers for an indefinite period:

- Mr Robert Alexander STEWART, born [REDACTED] at [REDACTED], [REDACTED], residing professionally at House of Commons, London, SW1A 0AA; and
- Mr Mohamed Reza REZAI-TABRIZI, born [REDACTED] [REDACTED] residing at [REDACTED]

Costs

The parties have evaluated the total costs and expenses, remuneration and charges, in whatever form, that are the responsibility of the Company or are charged to it by reason of its constitution at around one thousand three hundred euros (€ 1,300).

Witnessed, in Luxembourg, on date indicated above.

Further to reading hereof and interpretation hereof being provided to the party appearing, known to the notary by name, usual first name, status and residence, the party appearing signed the present document with the notary.

Highly Restricted: Parliamentary Commissioner for Standards

Colonel Bob Stewart MP
House of Commons
London
SW1A 0AA

By email only

30 August 2023

Dear Colonel Stewart

Thank you for making time to meet with us on 22 August 2023.

When we met, it was explained that our meeting would be recorded and that I would share a transcript of the conversation with you. Please find a copy of the meeting transcript enclosed alongside this letter. I have redacted parts of the interview which I felt were either irrelevant to this investigation or were of a personal nature.

Upon reviewing the evidence, I have one further question:

1. Upon reviewing VES Consultancy records held at Companies House, I note that the company filed dormant accounts for the year ending 31 October 2009 up to all the years to 31 October 2012. Could you please explain how you were receiving a monthly retainer from a dormant company.

You indicated that Dr Tabrizi may wish to send me some written correspondence in relation to this investigation. Please ensure that your response to my question above and any correspondence from Dr Tabrizi is received by **4pm 6 September 2023**.

This correspondence remains protected by parliamentary privilege, and I must ask that you maintain the strict confidentiality of the inquiry.

Yours sincerely



Daniel Greenberg CB
Parliamentary Commissioner for Standards

Tuesday 22 August 2023

Colonel Rt Hon. Bob Stewart DSO MP interview with OPCS

SP: So the aim of this meeting Mr Stewart, is really to ask you some questions to assist with the investigation that the Commissioner is currently carrying out. The way the meeting will go is I will ask you the main questions. [REDACTED] will then have an opportunity to ask any at the end of sort of the rounds, and then the Commissioner can also intervene if he feels there's a question that needs to be asked and we will also give you an opportunity to ask any questions as well. And if I can just remind you about any information about this investigation should remain confidential.

We did do an evidence pack for you but I can see you have printed it out as you're very organised. So question one - do you remember your initial email referral to the Commissioner. I've got it in front of you, it's not in the evidence pack but your initial email said that you omitted to register a change in the name of companies which you were involved in between 2012-17. You said in 2012 your involvement changed from VES Consultancy to Ksantex SARL both in the same group of companies with the same boards.

In your letter then, once we sent the initiation letter. I mean your letter dated 6 July 2021 is wrongly dated, but it's meant to be '23. You told the Commissioner you had become involved with VES Consultancy from July 2010, with the last payment received in October 2011.

BS MP: Yes, that's right. I was wrong earlier forgive me. I mean, I was just going on what I thought you know. I had nothing to do with these companies between 2011 and 2015.

SP: When we've looked at the register, your first payment was registered 22 July 2010. Last payment on 27 October 2010 and then the role remained on the register until 5 March 2012. So there's quite a lot of discrepancies between all three of these sources.

BS MP: Forgive me, as far as I know. What I gave you in the answer to your questions is accurate insofar as - when did your involvement with VES Consultancy end? October 2011 ok and I started it in July 2010. That I think it's as accurate as I can be. I mean, forgive me for discrepancies before I'm sometimes daft but human, I didn't you know, go back that long and I was just thinking, I also thought I was more involved with them than I was, and I wasn't. I'm just thinking of the money that came in really.

SP: Could you just explain then why no payments were registered on the register after 27 October 2010? Because that's the last registered payment, so there's a whole year where there's no payments registered.

BS MP: It was registered because I said it. So I'm at fault if I've done wrong there. I totally accept I'm guilty as charged and all I can say is forgive me, I'm sorry and I accept whatever the Commissioner decides.

SP: Ok then are you able to explain why the role remained in the register then until 5 March 2012?

BS MP: No, no.

SP: Right, so would you accept...

BS MP: I was pretty slack about it, but I do know that that's when the payments were made.

SP: Would you accept then that this represents a breach of rule 16 of the Code of Conduct at that time?

BS MP: Yes of course

SP: Ok that's really the questions on VES Consultancy. [REDACTED] did you have any questions?

HR: No, thank you.

BS MP: Can I explain about VES Consultancy?

SP: Yes, please do.

BS MP: I was asked to do it by this guy Bashirov who I only met - in his evidence to people -he said he'd met me once. In fact, he's met me twice. The whole paper pack that you sent me. I mean, it hardly refers to anything that I was involved with. It's to do with them, Hajiyev who runs the Afghan Kazakhstan bankroll. Whatever it is, it's nothing to do with me. I've never met the guy. Bashirov equally has never been in prison despite the allegations against him and I had absolutely...I categorically denied that they were anything to do with defence, this company. I thought I was just doing leadership training, which I was and you know, it was all on [inaudible] mostly. But that's the book that I wrote in 2009 about leadership in business and you know trying to say the right thing, and in those early days as an MP, I clearly wasn't. And I accept that I got it wrong. There's no excuse. I should have got it better. I'm not blaming my staff. I'm blaming myself. There is no other person I should blame but myself. And I really beat myself up. It's been a pretty horrendous couple of months because I've been beating myself up very badly on the whole thing. Is that all right?

SP: Yes of course.

BS MP: That explains, I hope. And the reason Reza Tabrizi, who a member of my staff. I met him in 2005 and he's [REDACTED] by birth. [redacted information]

His father was Finance Minister under the Shah and got on extremely well. He's British. He's utterly British in now because he's got [REDACTED] and [REDACTED] passport and when he got his PhD he worked in the Royal Aircraft Establishment as an engineer. Therefore, I knew that he'd been vetted.

Because you don't work there initially without being vetted and so that's when...and it was him, Reza that said look, this company, wants some leadership training with their startup or something and that's how I got involved. Now that's the background I screwed up on the way I have dealt with things and I'm wrong and at fault and there's absolutely no excuse for it. I should have been better, I'm old enough to know better. I just didn't keep a grip on it and that's the truth.

SP: What was your understanding of what VES Consultancy actually did?

BS MP: Yeah well, there we are because suggesting it's a defence company. It is not a defence company. Even the thing at the end of your package doesn't say it's a defence company. This morning, I checked with the woman

who I know who used to run the companies there. She said it was not a defence...it's not a defence company in Luxembourg. It's just an accusation.

SP: It's actually VES consultancy, sorry not Ksantex SARL, we haven't got that far. What was it VES consultancy, in your understanding did?

BS MP: Well, they gave advice and that sort of thing, that's what they were doing. I think I put it down what they did somewhere forgive me I can't read these without my glasses.

SP: You say registration of companies, preparing documents ...

BS MP: In fact, I visited them once in Luxembourg and that was what I understood it to be. One of the reasons why I didn't declare it to the Defence Committees, I just didn't think of...it wasn't defence. It wasn't defence, it was just a minor little thing that was a follow on from my previous work and it didn't last long because it didn't go very far but they did actually think I was good enough to come back to me cause the same bloke that ran VES years ago was so going into that bit which we'll will come to, of course.

Why the hell didn't I declare it? It's such a simple, bloody thing. Commissioner, I'm, you know, I'm really upset about that. Well, it was no skin off my nose not to declare it. I didn't. Maybe I'd had a brainstorm, maybe I thought I'd declared it. Obviously, I'm the slack. Obviously, I've got things wrong and I bitterly deeply regret it because this is gonna hurt my reputation.

BS MP: In macro I know I've done wrong things, I know I'm going to be punished in one way or another and you know that's a fact, I don't dispute it.

SP: Ok, we'll just going to the next - we're going to talk about Ksantex SARL now so we've sort of left VES Consultancy. You told the Commissioner again in your letter that you were involved with Ksantex SARL until September 2017. But the documents show that you formally resigned on 18 July 2017. It's page 44 of the evidence bundle. Can you just explain?

BS MP: No, I can't. I really can't because you know I didn't pay much attention, I never read that much about the companies. If I formally resign, I formally resigned and in other words, they cut me out. You know, the way they stop my consultancy and again I'm guilty of slacking. It's a bit like, why didn't I inform this office I was being taken on again? God knows. I don't know. Maybe I was under some mistaken illusion that I'd done it. I know I didn't and therefore and yeah.

SP: Do either of you have any questions on that point? Right, I'll go onto the next one then. So you accept you did not register your involvement with Ksantex in the register at anytime.

BS MP: No, I didn't.

SP: So do you accept that this represents a breach of rule 13 of the Code?

BS MP: Yes, I do.

SP: Alright, I'll move on from that point. Right, so there's an archived image of the website Ksantex SARL and that's page 109 and you probably had a look at it. The black and white photo. There's also a change of purpose that the company registered on 20 March 2017, and basically they changed it, which was the purpose, to include all articles of sporting equipment, tactical equipment and professional clothing intended for security or defence.

BS MP: I knew nothing about that.

SP: Right ok. Now, did you ever check the website?

BS MP: No.

SP: Right, you say you didn't know anything about the change of purpose either.

BS MP: Yeah.

SP: Right, you explain that your role with Ksantex was to provide leadership training. Would you agree though to carry out this role you'd need to have a bit of an understanding about what that company did?

BS MP: Well to be honest, I didn't. What I was talking about is general principles of how you make decisions and you know how you assess a situation. For example you know when you're when you're given a problem the three things you've got to know is, you know, what they really wanted to achieve, what tasks are required to achieve that and what advantages and disadvantages. And that's the sort of line I took and in decision making which was in military terms called mission analysis and SWOT analysis in business terms, you know, all of you, that sort of thing and that sort of old stuff. I didn't actually have any idea beyond I thought the company was just involved in sort of business type arrangements but it was not doing anything.

I don't think actually they...having checked this morning with the woman that ran it, I don't think they've ever had a defence contract at all. There was no defence contracts at all granted to the company. My ignorance on that there was no defence, so I didn't think it was necessary to declare it to the Defence Committee. I mean, I have never ever, Commissioner, advocated this company, said anything about the company or you know supported it in any way in Parliament. One reason is I knew little about it. Now that may well have been stupidity on my part, I totally accept that and now I'm guilty of that too. There we are.

SP: Just looking at the website I know you say you didn't see the website. Would you agree that looks like...

BS MP: Yes, it does, but it's not true. And you know, I've been talking to Dr Tabrizi this morning. I said, look one of the things the Commissioner's going to ask me is that. He said absolutely not it's not defence related in any way. He and I, well he rang the lady, the woman that ran the company this morning and that's what she said. Not one defence contract was ever dealt with so but she also said that that's the sort of thing you put up to attract business. That's what she said this morning. But as I've never seen it until you showed it to me and there we are.

SP: Right, just my final question on that point. What due diligence did you actually carry out in order to ascertain what the company did before you accepted the position?

BS MP: Well, I assumed it was to do very much what I'd done before, which was I've earned my living doing lectures to companies, corporates, lawyers and that sort of thing, particularly on decision making and working

under pressure and I use military principles. That's the book I wrote, which was fundamentally called Leadership under Pressure. It was for business, it got a five star rating on Amazon and damp sales. But, you know, that's the life of it, I mean, I used it. I did presentations with PowerPoint and I also used - going back - once I was a soldier, I used a lot of video stuff from Bosnia when I was in Bosnia and like, you know, decision making on opening a road block and trying to stop fighting, so negotiation when you're talking about ceasefires and the principles of that.

The sort of stuff that I'm quite sure all of you would understand, you know, having a red line, walking away, you know, all the stuff and it's been sort of my bread and butter, that sort of thing. Ever since I left the army, but when I was at university the army sent you there I did all these courses on decision making and crisis management and it actually it came good for me insofar as I could use those principles for lecturing and you know give lots of examples when I do lecture and of you know not doing the obvious thing. But actually everyone's got to be a winner. You mean negotiation, which we know you think it's cracked. You think it's normal but I don't wanna go into it.

That's why I was employed by these people who frankly, Bashirov I met once in Luxembourg and once I had lunch with him here with a whole group of people, and in the evidence which I have read, he says he can only remember meeting me once and I was certainly no decision maker in any of those companies. I was actually whatever they call me an Executive Director or whatever, I was actually a consultant. But what I did wrong was not declare that. And that is what I've done wrong and that is why, I'm before the Commissioner, and that is why I am deserving of punishment you know, if that is the Commissioner's wish, there will be no appeal frankly. I've been a bad boy and I should have known better.

SP: Did you want to have a little break and have some water maybe?

BS MP: No I'm fine, I think you're being very kind.

SP: We'll move on then to the next...

HR: I'd like to talk to you about these seminars, just to make sure I completely understand. Were they regular?

BS MP: Well infrequent actually, it was sort of we go...they had an office here, which my brother at one stage was involved in. We'd do things either in the office when people came in or they'd do something in a hotel and I set up a slide thing. It was much less than I thought it would be. I thought it was money for old rope actually. You know, I've got all these packages of things which wasn't even hard work for me because, you know, been doing it since 2003. So I got all these packages but it wasn't difficult. In fact, it's quite good fun, although slightly repetitive.

HR: So how many would you say over the years? I don't need an exact answer, it would just give us like...

BS MP: I don't know, in a year, six, seven.

HR: Thank you, and what were the format of these seminars?

BS MP: 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.

HR: So you described a lecture, was there a more interactive side?

BS MP: Yeah I didn't mind people asking me, cause it was their seminar. I wasn't telling them how to do it, I was just saying how I did it.

HR: And were any of the questions in anyway related to defence or anything similar?

BS MP: No.

HR: Thank you, that's helpful. Just a couple of points I wanna pick up on, you've talked about, I think it was VES doing their business, doing business type arrangements. Could you explain a little more what you mean?

BS MP: Yeah, to be honest it was all to do with setting up companies and trying to get contracts. That's what they were all about. It certainly wasn't defence. I understood it to be, you know working out arrangements, getting contracts and it was in Kazakhstan, Azerbaijan, that sort of area and I had worked in Kazakhstan before, when I worked for Group 4 Securicor briefly beforehand. So I knew the area and of course one of the reasons why I got very friendly,

well, he's a really good friend Reza Tabrizi, he's upstairs and my office is in this building at the moment and I told him you're not coming with me this morning because the Commissioner thinks it's inappropriate and fine. You know that's fine by me. I just thought he would be here. And I can't remember, one of you said you don't want him intervening. You can't have him intervening on this and that I totally get, you know. But he may well, if you wish it, explain more Commissioner, by sending you a letter, you know, explaining how I was fundamentally, I hope, prove, show that I was totally innocent of any sort of deviousness.

I had no idea about any defence stuff. I don't think...they haven't got a defence contract. The most they might have done is buy some tables and chairs off the Luxembourg army. It's never touched this country and it's never touched NATO as far as I know. So that's it.

HR: You mentioned contracts. What sort of contracts that you thought they were going after?

BS MP: They were fixers, you know, like Reza himself was an international fixer he'd arrange contracts with companies and his background having been [REDACTED] having come here, he started in industry and then moved into business the sort of contracts were arranging for buildings in...or a factory being built or setting up a factory. Fish, fish factory, or something in Azerbaijan, sturgeon or something like that. I don't know. I mean, to be honest, it was pretty vague to me and the reason it was vague is I didn't really need either need or want to know because I didn't need it for what I was doing, which was fundamentally the principles of leadership and it was principles of leadership based on my experience, not showing them how to do it.

HR: And apart from these seminars, did you have any other contact or role with either company?

BS MP: No.

HR: You mentioned that you met and...sorry...

BS MP: Bashirov.

HR: Bashirov in Luxembourg. Was that in relation to this role?

BS MP: Yeah, it was just, I think it was shortly after I was there and they were thinking of hiring my brother at some stage and they did hire my brother. My brother was an ex-Wing Commander in the Air Force and I think he was employed for about two years by them in their office where I did seminars and things here up in Mayfair, but that didn't come good. I mean, the company seemed to go into the sand, which is why they got rid of me or, you know the, you know, my usefulness was over.

HR: I see, what was your brother hired to do?

BS MP: He was hired to try and get, with his experience, get contracts. I mean, he was particularly still involved with doing, recording things that can go to court for policemen. So when they have a police interview, say, they've got a video and recorder and these work pretty well and that's what he was doing, I think. That sort of thing.

HR: So when you say his experience...

BS MP: I didn't have much to do. I didn't...apart from going...you know, clasping my brother's hand and having a drink with him and you know, he's my younger brother and you know, apart from that, I didn't really have much. I didn't have anything to do with him being hired or fired. Or you know, his...I just knew he got a damn sight more money than I did.

HR: And in this meeting, or any other contact you had with either company, did you ever, were you ever asked about or did you ever discuss your role on the Defence Committee?

BS MP: No.

HR: Thank you that's helpful.

BS MP: The honest truth is I just didn't connect it. There was nothing to do with defence. Apart from the only thing I can say is I use the example of my decision making in Bosnia when I was a military officer and you know, for example I do a whole presentation on breaking through a road block and the negotiations or ceasefire negotiations or you know that sort of thing.

[redacted information]

BS MP: Leadership and decision making. How do you make a decision? Why do you make a decision? Always be prepared to answer up. Don't blame someone else. And I hope I feel that, you know, I could blame my staff for this. I do not in one moment even suggest that my staff should be blamed. I am responsible for my actions. There is a difference...you know I'm responsible and I'm at fault.

HR: Thank you, I just want to clarify one point. So you've said that the meeting was regards to your brother because of his experience at that point, are we talking about experience from a defence perspective?

BS MP: No, I think it was, I think it was from a business perspective. He was a businessman for much longer than I was.

HR: Right. So at that point, did that make you consider whether or not the company was involved in defence?

BS MP: No, not at all. He wasn't involved in defence stuff really.

HR: Thank you that's very helpful.

SP: There's a few more questions and I'm sorry if some of them might sound like a duplication because you have answered, but I do have to clarify so it's not to catch you out or anything. It's just so we know we've got the right answer. Right so the next thing we're going to talk about is declarations and you have touched upon this, but you were on the Defence Select Committee from 2010 to 2017. You involved with Ksantex SARL from February 2015 to September 2017. Unfortunately, two different conduct rules apply during this period. It's the 16 April 2012 and 14 April 2015, and I have just printed out the relevant sections, so if you could just take a moment to have a look through those are the relevant guidance in relation to declarations for Select Committees.

BS MP: I've read that and the truth of the matter is, I didn't think they were relevant.

SP: Right.

BS MP: I did actually ask people, I remember asking. Because they thought it was totally irrelevant. I may have misread it, but you know, I didn't think it was relevant.

SP: Why would you say that?

BS MP: Because it was nothing to do with defence.

SP: Right, ok so if you can confirm at any time during involvement with Ksantex, did you make any declarations about your involvement with Ksantex?

BS MP: No, I don't think I did because otherwise it would show, wouldn't it? And I haven't and that's my mistake. God knows why, Commissioner. I don't know why. Because they sent me a contract which showed, you know, dug up. Why didn't I twig. Did I think I've worked with these people before, was it necessary? After all, I was pretty slack about that. So I'm pretty slack and I'm not anymore. I'm really on the ball now but it was a long time ago. That's no excuse. Same sort of excuses saying someone that murdered someone is an old man now you should let him get away with it. No way. No, I didn't.

SP: Reading the rules now do you...do you accept you should have made a declaration?

BS MP: Which bits? Because I've felt even these ones, as far as I've read, I've only done a quick skim.

SP: Right, so this basically...

BS MP: I still don't think that there was a direct concern to defence.

SP: Right.

BS MP: There was nothing there concerned to defence.

SP: Right, okay so you already told us that you carried out no due diligence. You told us that earlier.

BS MP: I didn't say that, but I implied that.

SP: Yes you were quite clear that you hadn't done any homework. How would you have expected then to meet your declaration obligations if you didn't know what the companies you were working for were doing? How would you have met these?

BS MP: I mean, I knew they weren't anything to do with defence that's why.

SP: How did you know that though if you hadn't...

BS MP: Well because, Reza and I spoke to them, you know, when I spoke to them I said there's nothing to do with the defence. They said no.

HR: Was that at the time?

BS MP: Yeah, at the time. There's nothing to do with defence.

DG: Is that when you said sort of a moment ago, you asked people and they thought there was no relevance – are those the people?

BS MP: That's asking people in the Defence Committee.

DG: Will come back that in a moment...

SP: So at the time you asked then?

BS MP: No I asked Defence Committee, you know, doing leadership. This has got nothing to do with defence, is it? Anything to do with defence? No. Did I go to these companies and ask them about it? No, because Reza assured me and you know, there was nothing to do with defence. And he would tell you that if you wish to get evidence from him. And I trust Reza Tabrizi with my life having done quite a lot of involvement with the guy since because we live quite close together.

SP: Right ok did either of you have any questions on that point?

HR: Just to make sure I'm 100% clear on the timeline of this. So you have said you are...I have understood from what you said that you asked people at the time whether you should declare this interest is that right?

BS MP: I think I did. I mean I was on the Defence Committee for seven years, ok, with people. I mean when you have a start in probably 2010 or 2015 said do you need to declare anything - that's what the chairman says - and I said, do I need to declare you know that I'm doing some leadership training? No. Why would you. You know,

unless it's defence and it wasn't. And then...and I honestly believed...slack maybe? For not doing due diligence on the internet, but I'm not great on the internet clearly. Well not clearly, I'm not. And as I did believe it was defence and it isn't to do with defence. There's not one defence contract they can...openDemocracy haven't found a defence contract, have they? No, they haven't.

You know so it just looks like it and towards the end of my time there's this paragraph where they took in putting, but I didn't know anything about it. And then I got a month or so later I was out.

HR: You refer to the assurances that you've had from them that they are not involved in defence? When did you get those assurances?

BS MP: Right at the start. When I started, you know, in 2010 and when 2017 or 2015, whenever it was.

HR: So you asked at the time?

BS MP: Yeah.

HR: And who was that you would have asked?

BS MP: Well actually, it's Reza. And the contact whose name I've got. He's got a strange name, who wasn't into defence. And he said yeah no. And where we are.

HR: And what was the format of those questions?

BS MP: Just asked on the phone, on the phone.

HR: I see, thank you. So how did this contract come to an end? You mentioned earlier being...I've written the phrase down..."chucked me out".

BS MP: Well, they just said it's no longer required. You know, we're not paying you anymore that's the end.

HR: Was there any reason given or?

BS MP: I think it's because the company weren't doing very well.

HR: Thank you. That's everything from me.

BS MP: I mean, I think the 2010 company went into the sand and I'm not sure whether the other one still going. I don't know, maybe.

SP: Right just going back to the website, I know we've covered the website. Just a quick question. Why would you say they emphasise soldiers and helicopters on the website if they had nothing to do with defence?

BS MP: I don't know, it looks good. I mean, [REDACTED] who I spoke to or Reza spoke to this morning, who I know quite well actually used to run, she's a Kurdish woman who, you know, was very, very clever. Said that when we asked her why is that...she said just did that to make it look better. You know.

DG: Sorry, who asked her when?

BS MP: Well, this morning. Dr Reza Tabrizi who is in my office.

DG: Got it, got it.

BS MP: Actually rang and spoke twice.

DG: I see.

BS MP: She doesn't work for the company anymore and she's in Luxembourg.

DG: You mentioned earlier, you think they may have done...they may have had one contract in buying some office equipment and its surplus equipment from...did you say the Luxembourg...

BS MP: That's what she said this morning.

DG: That's again, that's what she said this morning. Because you said that's the most they might have done. So is that her sort of trying to be helpful and trying to

BS MP: I don't think so she's just trying to be truthful during.

DG: No, no, sorry I mean. Is that her? When she says the most, they might have done. She's trying to be as accurate as possible.

BS MP: Yeah. The reason why they got rid of her is because she was too good.

DG: I see.

[redacted information]

SP: Did you speak to or approach any public officials or other Members on behalf of either VES Consultancy or Ksantex SARL?

BS MP: Absolutely not. I didn't even know the name of the bloody companies to be honest. Forgive me using a swear word. I just thought that what I was doing was neutral, you know, teaching people how to do their job. Whatever their job was, whether it's cleaning lavatories or running companies.

SP: We did ask you for contract of your work with Ksantex and you did kindly provide something, but that was more sort of registration as an Administration Manager. Did you ever sign a contract for this work? Do you remember?

BS MP: I signed that thing, didn't I? I can't remember signing anything. I mean, if I signed it...

SP: Yes, it was this on page 5 of your...

SP: That's what you sent in, yeah. I can't see a signature but that's what you sent in. We've had it translated, because the one you sent is not in English, but is that all you have?

BS MP: Yeah.

SP: So you never actually had a job description or anything?

BS MP: No.

SP: Do you think it would be helpful for us to speak to anyone else in relation to this investigation?

BS MP: Well, Dr Reza Tabrizi who was the key guy is quite prepared to come give evidence to Commissioner if you wish it to happen. He could do that now, he's upstairs. Or he could do it at your convenience. Or he could write. What he would say is Bob Stewart's pretty innocent of this of knowing anything about defence thing because it wasn't a defence company. He confirmed that and you know he was the guy that got me in these contracts, he knew Khagani from a long time ago. Khagani actually in fairness to him when I met him, didn't seem a bad bloke. And Reza Tabrizi assures me he's being set up by the government there because the President's trying to steal the money from the bank and it's all [redacted information].

When he I think he gave evidence to this man from openDemocracy, saying Bob Stewart had nothing really to do with any decision making, he said that and he said, I think I can remember it and you know, and it was nothing to do with, you know, the company's running or anything. And you know, I'm not an arms dealer and I don't think I'm particularly corrupt, obviously I'm stupid on some things and this is one of them, but that's it.

SP: I mean, that's the end of my questions. So unless [redacted] or? Do you have any questions? Do you have any questions for us just before...?

BS MP: No. All I ask is I know the Commissioner's reputation, so I'm not trying to be...the Commissioner's reputation as being extremely fair and decent man, that's the reputation I asked to be treated fairly. I'm not a bad man. I'm a foolish man sometimes, particularly when it comes to business, because I haven't had that much experience in it. And you know, contracts and that sort of thing. Someone says to me - would you do some leadership training? I say yeah. We'll pay you. Thanks very much, good, thank you, you know, I'll have that. Because that's how I worked from 2003 to 2010. You know, I was what they call a sole trader, solo trader or something. That was my status, I didn't make much money. And you know, but it was...my business was from, you know, Cambridge University to small companies where I'd go in and tutor someone. Goodness knows how I could teach anyone defence. But leadership perhaps I had some sort of kudos on and man management or woman management these days, whatever it is person management, then it probably changed the title, but that's what I did.

So when Reza said they want some leadership thing, it's up your street, Bob, you know I said ok.

[redacted information]

BS MP: I'm bloody awful because that was all over the place when I was talking to you, so it's pretty, pretty awful. But you know, I presume I'll be in front of the Committee at some stage for my crimes that would be the decision of the Commissioner. I'm totally expecting that and I hope, I will make, put up a good case for leniency if not. But I am guilty, there's no doubt about that. I'm perfectly willing to apologise publicly in the House of Commons for my slackness. It was slackness, not deliberate criminality, it was slackness. It was...I just don't know why.

It's the main thing, the main two things that I've done wrong is if you think that I should have declared to the Defence Committee. I don't. I didn't think I needed to. If the Commissioner thinks I should have done, then I'm guilty, ok.

And the second thing is I certainly didn't declare...and that I'm guilty of and that I apologise for profusely, because actually, for God's, for goodness sake, why did I not do it? Maybe...I've been through that, I won't repeat it. Maybe I was just having a brainstorm. There are other factors, but not relevant to this meeting. My honest truth is I didn't mean to do it. I'm very sorry. Please believe me that actually I don't want to bring the house into disrepute. I didn't mean to and you know I'm a good MP I think. Not as good as some and not as bad as some. But the one thing I am not is someone that wants to bring anyone into disrepute. My brother won't like this either, cause if he's involved, my brother was...has got a good reputation. Mind you he was in the RAF.

SP: So we'll try and get the transcript to you in the by the end of the week. Definitely for you to have a check.

BS MP: Can I ask one question, Commissioner? Having heard, do you want to listen, do you want to hear what Tabrizi has said to say or do you not need it?

DG: I think we'll have a little chat about when we've looked at the...

BS MP: And when you send me the transcript, if you say perhaps we could have a word with Tabrizi, if you feel. I mean, I don't think he's going to say anything more than I've said he was telling you frankly that he's my best friend now. And as I said, I would trust him with my life so obviously, and I might be biased, but the fact of the matter is he would tell you that Bob Stewart did not know anything about this being a defence company because it wasn't a defence company and he made a mistake. Which he and I have discussed that we should have, we should have declared it.

DG: We'll think whether we'd like to ask him to come and see us and if he decides he'd like to write. He is, of course, able to do that. He, is perfectly at liberty to write to me if he wants to do that.

BS MP: That's very nice of you, thank you.



Colonel Bob Stewart DSO MP
House of Commons
London
SW1A 0AA

Daniel Greenberg CB
Parliamentary Commissioner for Standards
Parliament
SW1A 0AA

1st September 2023

Dear Commissioner,

Thank you for your letter dated 30 August.

I have no problem with the transcript which is accurate. However, with regard to my breaking Rule 16 may I clarify that I did not believe my work was in any way Defence related and I wonder whether I should have replied 'No' when asked the question about my breaching it? I honestly did not believe a declaration was necessary.

In answer to your specific question about monies which might seem to have come from a dormant company, I gather that my payments from VES Consultancy were from VES Azerbaijan. This entity is not a dormant company and continues to this day.

Finally, I hope you do not mind but I did discuss the transcript with Dr Reza Tabrizi. He knows more than me about VES Consultancy and KSANTEX. You kindly suggested Dr Tabrizi might wish to write to you as well and he is going to do so by 6th September.

I am sending this letter by e mail and by post.

Yours Sincerely,

Bob Stewart

Highly Restricted: Parliamentary Commissioner for Standards

Colonel Bob Stewart MP
House of Commons
London
SW1A 0AA

By email only

3 October 2023

Dear Colonel Stewart

I have tried to contact a representative from Ksantex SARL as I require further information to assist me with my investigation. Unfortunately, all efforts to establish contact have not succeeded.

Therefore, I require the following information from you.

2. You have told me your role for Ksantex SARL required you to provide leadership training to members of staff. You also advised me during your interview that you gave approximately 6 training sessions per year.
 - a) Please provide me with the dates of each seminar you delivered during your employment with Ksantex SARL.
 - b) Please provide me with details of venues at which each of these seminars were delivered.
 - c) Please provide me with your training brief from Ksantex SARL, and the training materials you utilised for the delivery of these seminars.
3. A copy of the minutes of the 2015/2016, 2016/2017 and 2017/2018 annual general meetings for Ksantex SARL.
4. The Ksantex SARL archived website which we showed you during the interview states that Ksantex SARL can provide military equipment and weapon accessories. Could you explain why you state that Ksantex SARL has not been involved with defence matters.

Additionally, during your interview, you said that you had discussed whether you had a registerable and/or declarable interest with a number of people. Please provide a copy of **all** advice that you received, in writing, regarding this matter.

If you do not have this information in your possession, I suggest you contact Ksantex SARL who would be able to provide this to you.

Please ensure that your response is received by **4pm 17 October 2023**.

This correspondence remains protected by parliamentary privilege, and I must ask that you maintain the strict confidentiality of the inquiry.

Yours sincerely



Daniel Greenberg CB
Parliamentary Commissioner for Standards

Bob Stewart DSO MP
House of Commons
London
SW1A 0AA

Daniel Greenberg CB
Parliamentary Commissioner for Standards
House of Commons
London SW1A 0AA

13 October 2023

Dear Commissioner,

I write in reply to your letter to me dated 3 October. I am sorry you have been unable to contact Ksantex SARL and, of course, I have tried to do so too but with little response.

1a. I believe that I gave presentations or took Q & A sessions at Ksantex SARL's office in London, mainly on Mondays. Dates were as follows:

2015: 9 March, 20 April, 29 May, 17 August, 11 September and 11 December.

2016: 4 January, 16 May, 27 June, 18 July, 10 October and 28 November.

2017: 30 January, 4 April, 5 June, 17 July.

1b. The presentations were held in Ksantex SARL's offices at 25 Bruton Lane, London, W1J 6JQ. Sometimes they were really just discussion sessions. One was cancelled when I got there. I did things mainly by the internet on Skype as people on the call were sometimes in Azerbaijan.

1c. I had no written brief from Ksantex SARL except I was told the main aim was how to lead, how to plan. My talks were based on my 2009 book called 'Leadership under Pressure'. I attach a copy of one of the main PowerPoint lectures I used at the time. Prior to becoming an MP I earned my living giving very similar presentations to all sorts of companies and organisations.

2. I had nothing to do with the running of the company and certainly never saw any minutes. Neither was I ever asked to attend any AGMs. I have no idea how to get hold of such documents especially as they are not responding to me.

3. As I mentioned in my interview the Ksantex SARL website appears to be exaggerating and I gather it was a marketing ploy to try and get more business. At the time I never saw it either. Most recently, after your investigation began, 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.

With regard to advice about declarable interests I recall discussing the matter with other colleagues and they felt, like I, that if my relationship with Ksantex SARL was purely leadership training and it was not defence related, which I believed it was not. Thus I felt there was no need to inform the matter to the Defence Select Committee. I am sorry but I do not recall exactly who were those people.

With best wishes,



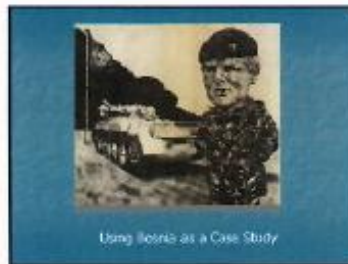
Bob Stewart

PRESENTATIONS MEETINGS
BRUTON LANE

[illegible]



1



4



7



2



5



8



3



6



9





Early Lessons in Care by
Major General The Earl Cathcart



Sergeant Pauline C. Gault

Sacredist at Camp Pele in February 1993



The Power of Positive Psychology in a World of Uncertainty

Morale
Vital to cope with Uncertainty



A soldier 'repping' news. 11th Centigra

In Bosnia, tactical commanders always estimated the Mujahideen Group strength at 3rd - 4,000. It was only 650.

High morale was a force multiplier!

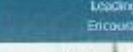


Encouraging High Morale

- Leadership crucial
- Know the team
- Care about them
- Explain things clearly
- Don't blame others – blame yourself
- Trust others



He fought once in the presence of Darius III at the battle of Issus (333 BC) where he was worth 40,000 soldiers.



Leading from the Front
Encourages High Morale

Major armored units led by
HQ Buffalo Company
Major, Carolyn Roeder

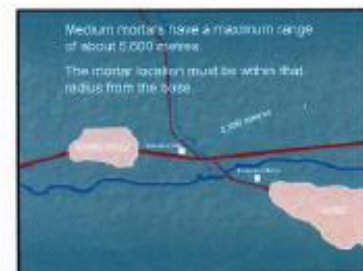
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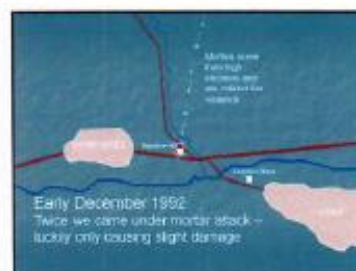
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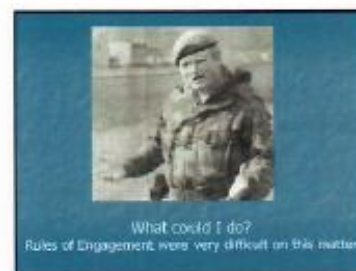
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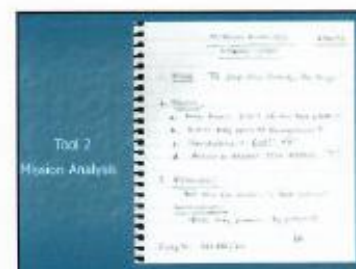
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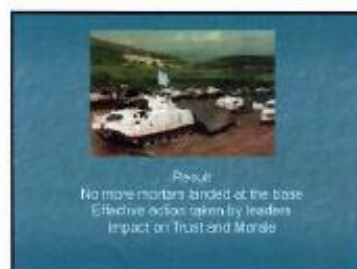
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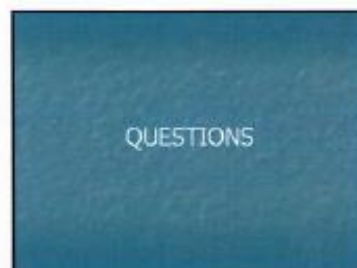
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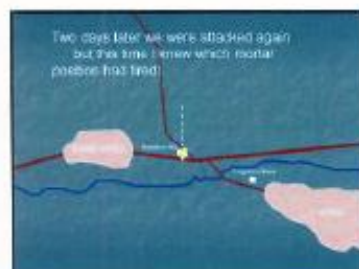
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48



51

Office of the Parliamentary Commissioner for Standards

Highly Restricted: Parliamentary Commissioner for Standards

Colonel Bob Stewart MP
House of Commons
London
SW1A 0AA

By email only

23 November 2023

Dear Colonel Stewart

We have now received a response from the current CEO of Ksantex. Please find a copy of that response in the evidence bundle attached.¹

In order to conclude my investigation, I require the following information from you.

1. In your letter to me dated 1 September 2023, you explained that your payments from VES Consultancy were actually received from VES Azerbaijan. I am unable to find any information about VES Azerbaijan. In addition, when interviewed by Open Democracy, Mr Bashirov does not mention VES Azerbaijan but accepts he was an economic beneficiary and director of VES Consultancy UK Ltd and Ksantex.² Please can you provide any information you have about VES Azerbaijan, including the following:
 - a) how you know that the payments were received by that company;
 - b) confirmation that it was not a dormant company;
 - c) what VES Azerbaijan's nature of business was.
2. During his interview with Open Democracy, Mr Bashirov states that you were on the board of directors and your duties were limited to consultancy.³ He does not mention that you were employed to provide seminars to his staff members. Please explain this discrepancy.
3. Mr Ahmadov (current CEO of Ksantex) states he is not aware of any seminars being provided during his mandate, which commenced on 1 February 2017.⁴ In your recent evidence to me you told me that you provided seminars on the following dates; 4 April 2017, 5 June 2017 and 17 July 2017.⁵ You have also attached a record of seminars on these dates on your document titled 'Presentation Meetings Bruton Lane'.⁶ Please explain this discrepancy.
4. You have provided me with a document titled 'Presentation Meetings Bruton Lane'.⁷ Please advise what this document is, when it was filled in and by whom.

¹ Pages 44-49 of Evidence Bundle

² Page 146 of Evidence Bundle

³ Page 146 of Evidence Bundle

⁴ Page 44 of Evidence Bundle

⁵ Page 33 of Evidence Bundle

⁶ Page 35 of Evidence Bundle

⁷ Page 35 of Evidence Bundle

House of Commons London SW1A 0AA

standardscommissioner@parliament.uk

020 7219 3738 Text relay: 18001 207 219 3738

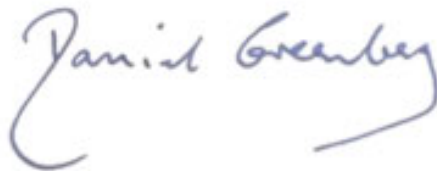
Independent | Impartial | Thorough | Fair

5. Mr Ahmadov has provided a document which shows you resigned as a director of Ksantex on 8 June 2017.⁸ Please explain why you have told me that you provided a seminar on 17 July 2017. Please also explain why you told me that you had continued to work for Ksantex until September 2017.⁹
6. Mr Ahmadov has provided a document relating to a payment you received in December 2015.¹⁰
 - a) Please explain what this payment was for and why you did not register this in the Register of Members' Financial Interests.
 - b) This document is signed by you as Administrative Manager and relates to a decision made by the directors of the company. You told me in your written correspondence and interview that you provided seminars only and were not involved in any decision making.¹¹ Please explain.
 - c) You told me that your involvement with VES Consultancy ended in October 2011. Please provide any evidence to support this. The role remained on the Register of Members' Financial Interests until 5 March 2012. Please explain what prompted you to remove the role from the Register.
 - d) When you are initially approached by Open Democracy you confirm that you were not aware of any connection between Khagani Bashirov and both VES Consultancy and Ksantex.¹² In your interview with me, you told me that Mr Bashirov had personally offered you both positions at VES Consultancy and Ksantex.¹³ Please explain this inconsistency.

Please ensure that your response is received by 4pm 7 December 2023.

This correspondence remains protected by parliamentary privilege, and I must ask that you maintain the strict confidentiality of the inquiry.

Yours sincerely



Daniel Greenberg CB
Parliamentary Commissioner for Standards

⁸ Page 49 of Evidence Bundle

⁹ Page 3 of Evidence Bundle

¹⁰ Page 46 of Evidence Bundle

¹¹ Page 4 and 15 of Evidence Bundle

¹² Page 51 of Evidence Bundle

¹³ Page 2 and 3 of Evidence Bundle

Bob Stewart DSO MP
House of Commons
London
SW1A 0AA

Daniel Greenberg CB
Parliamentary Commissioner for Standards
House of Commons
London SW1A 0AA

6th December 2023

Dear Commissioner,

I write in reply to your letter to me dated 23 November. I will respond to your points using the numbers/letters from your letter and will also refer to an e mail I have just received from Mr Bashirov in response to me asking for his comments. It is enclosed with this letter.

1. I am told that I was paid by Vnesh Expert Service (VES) which was registered in Azerbaijan in 1991 and it is still active. I presumed I was paid by VES Azerbaijan. As indicated in the note from Mr Bashirov payments were all made by VES. VES specialises in consultancy, registration of companies and translation.
2. Mr Bashirov, at page 146, para 10 of the evidence bundle indicates that I was a director but had no right to manage anything. I was employed to do online presentations and as a consultant.
3. I provided a whole series of leadership presentations when asked to do so – particularly by another company owned by Mr Bashirov (Ksantex). I cannot recall doing a presentation in the presence of Mr Ahmadov with whom I had no dealings. I acted on instructions on behalf of Mr Bashirov and not Mr Ahmadov.
4. It was a personal record of what I did and when.
5. I made the presentation as and when requested. To be straight it was irrelevant to me when exactly payments ceased. They were good to me, and I was quite prepared to give pro bono presentations as I enjoyed so doing.
6. a. To be honest I cannot recall and clearly, I made mistakes for which I apologise.
b. 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).

c. I am afraid I have no evidence that I ended my time with VES Consultancy in October 2011. I suppose I amended the Register of Financial Interests when I noticed I was still declared as being involved with it.

d. Open Democracy made several allegations such as Ksantex being a Defence-related business which sold Defence equipment and advice. It was not. What I said to you is correct. With regard to my response to Open Democracy I was not sure exactly who was the ultimate owner of these companies.

I end by accepting that I have done wrong and can only repeat that I apologise.

With best wishes,

Yours Sincerely,

Bob Stewart

STEWART, Bob

From: Kh. Bashirov [REDACTED]
Sent: 01 December 2023 00:26
To: STEWART, Bob
Subject: Clarification Letter

Dear Colonel Stewart

I would like to clarify a few points that were raised. One is your payments by VES. You provided your services to VES, as a group and the payments were arranged by our offices in Baku. Vnesh Expert Service was registered in 1991 and it is still one of the most successful Azeri companies. Your leadership presentations and advice helped the company to grow and we are grateful for that.

On Ksantex let me first touch upon the claim that it was a defence related company. As I indicated on numerous occasions Ksantex was never involved in military equipment or arms sales or defence advice. I believe Seymour Ahmadaovhas also made this clear to your Commission. These are unfounded and libellous accusations. You kindly provided the same leadership presentations and consultancy work to Ksantex as you did for VES. I don't understand where the problem is.

You were kind enough to help these companies grow with your leadership advice. You were neither involved nor were authorised in running or managing these companies. This is why I called your work with us a consultancy, as you call it in the UK, a non executive director.

Finally I have to add that the Open Democracy's report and allegations against me and you were unfounded, it was headline grabbing material and defamatory.

I hope this note will clarify the points raised by your commission.

Kind Regards

Khagani Bashirov
30 Nov 2023

Envoyé de mon iPhone

Office of the Parliamentary Commissioner for Standards

Highly Restricted: Parliamentary Commissioner for Standards

Colonel Bob Stewart MP
House of Commons
London
SW1A 0AA

By email only

22 January 2024

Dear Colonel Stewart

I need some final information from you in order to finalise my investigation into this matter.

Please provide answers to the following questions:

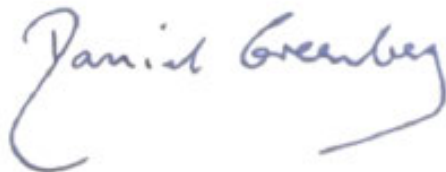
1. Please confirm that you were paid £3,000 per month for the duration of your roles for both VES and Ksantex.
2. You told me that you provided 6-7 seminars annually. Please explain who were attending these seminars.
3. Do you have any more information about the company Vnesh Expert Services?
4. Please explain if Mr Bashirov is connected to Vnesh Expert Services in any way. Please provide documentary evidence to support your response.
5. Do you agree that you breached the registration rules in relation to your role with VES in the following ways:
 - a) The name of the company paying for your services was registered incorrectly.
 - b) All the payments you received during your tenure with VES were not registered.
 - c) You failed to remove the register entry within 28 days of your role ending.
6. I need further information in relation to the payment of €45,600 you received from Ksantex in December 2015:
 - a) Do you accept you received this payment?
 - b) Why did you receive this payment?
 - c) In your last correspondence you told me that you do not recall this payment. Please explain why you are unable to recall such a large payment.
 - d) Did you receive any other payments from VES or Ksantex that you have failed to register? Please ensure you check all your records to confirm your response.
7. Do you agree that you breached the registration rules by failing to register your role with Ksantex and any of the payments you received including the payment of €45,600?
8. Do you accept you carried out limited checks in relation to both VES and Ksantex prior to accepting a position with both companies?

9. When you were initially approached by Opendemocracy, you told them that you were not aware of any connection between Khagani Bashirov and both VES Consultancy and Ksantex.¹ During this investigation, you told me that Mr Bashirov had personally offered you both positions at VES Consultancy and Ksantex.² Please explain this discrepancy.

Please ensure that your response is received by **4pm 29 January 2024**.

This correspondence remains protected by parliamentary privilege, and I must ask that you maintain the strict confidentiality of the inquiry.

Yours sincerely



Daniel Greenberg CB
Parliamentary Commissioner for Standards

¹ Pages 67-68 of Evidence Bundle

² Pages 9,10,18,22 and 25 of Evidence Bundle

From: STEWART, Bob
Sent: Monday, January 29, 2024 12:39 PM
To: Standards Commissioner
Subject: RE: Private and Confidential

Dear Commissioner,

I am so sorry to have made such a mess of things and apologise completely.

Below are your questions and my answers as far as I can ascertain.

1. Please confirm that you were paid £3,000 per month for the duration of your roles for both VES and Ksantex.

Answer: Yes that is correct.

2. You told me that you provided 6-7 seminars annually. Please explain who were attending these seminars.

Answer: They were attending remotely from Azerbaijan and I am afraid I do not recall their names.

3. Do you have any more information about the company Vnesh Expert Services?

Answer: Vnesh Expert Services was registered in Azerbaijan. I believe that happened in 1994. I also understand the company provided registration and translation services.

4. Please explain if Mr Bashirov is connected to Vnesh Expert Services in any way. Please provide documentary evidence to support your response.

Answer: Mr Bashirov was the founder of Vnesh Expert Services. I have no documentation on this.

5. Do you agree that you breached the registration rules in relation to your role with VES in the following ways:

a) The name of the company paying for your services was registered incorrectly.

Answer: I did not think that to be the case but if it was I am sorry..

b) All the payments you received during your tenure with VES were not registered.

Answer: I thought they were. If not I accept I am at fault and apologise.

c) You failed to remove the register entry within 28 days of your role ending.

Answer: Yes I am at fault for that and apologise again.

6. I need further information in relation to the payment of €45,600 you received from Ksantex in December 2015:

a) Do you accept you received this payment?

Answer: Yes.

b) Why did you receive this payment?

Answer: For providing consultancy in the form of leadership presentations.

c) In your last correspondence you told me that you do not recall this payment. Please explain why you are unable to recall such a large payment.

Answer: The whole issue raised by Open Democracy was that I did not register this income. I accept that I did not and apologise.

d) Did you receive any other payments from VES or Ksantex that you have failed to register? Please ensure you check all your records to confirm your response.

[Answer: No I do not believe so.](#)

7. Do you agree that you breached the registration rules by failing to register your role with Ksantex and any of the payments you received including the payment of €45,600?

[Answer: Yes I do and I apologise unreservedly.](#)

8. Do you accept you carried out limited checks in relation to both VES and Ksantex prior to accepting a position with both companies?

[Answer: Perhaps not but both companies are still running successfully. Apparently V.E.S. is still the most successful company in Azerbaijan. There is no evidence of wrongdoings either by V.E.S. or Ksantex.](#)

9. When you were initially approached by Opendemocracy, you told them that you were not aware of any connection between Khagani Bashirov and both VES Consultancy and Ksantex.¹ During this investigation, you told me that Mr Bashirov had personally offered you both positions at VES Consultancy and Ksantex.² Please explain this discrepancy.

[Answer: I am not great with names – particularly foreign ones. That was probably clear from my first interview when was mixing up V.E.S. and Kasantex.](#)

With best wishes and again apologies.

Bob Stewart

Bob Stewart

MP for Beckenham

(Bromley Common, Coney Hall, Copers Cope, Eden Park, Hayes, Kelsey, Keston, Shortlands and West Wickham)

Westminster Office: 020 7219 7011

bob.stewart.mp@parliament.uk



Bob Stewart DSO MP
House of Commons
London
SW1A 0AA

Daniel Greenberg CB
Parliamentary Commissioner for Standards
House of Commons
London SW1A 0AA

16 February 2024

Dear Commissioner,

Thank you for the opportunity to comment on your Draft Memorandum to the Committee on Standards. I have a few points I wish to make in response.

I was paid by Vnesh Expert Services in 2010 which was a part of the VES Group of companies. For that I received £3,000 a month which I believe I declared despite my dates were faulty. Ksantex in 2015 paid me £45,600 per annum which I erroneously did not declare. There was no additional payment.

Whether I was dubbed as a consultant or non-executive director my role was simply to provide leadership training (paragraph 68).

I do not believe that Ksantex had any links to Defence and never traded in Defence related materials (paragraphs 75 – 86) which the CEO and shareholders of the company confirmed. I gather that any Defence related images on a website was for marketing purposes only and I never saw such a website. I did not think my work on leadership with a non-defence company required registration with the Defence Select Committee.

I accept that I mistakenly did not register some payments in 2010 – 2011 and I failed to register £45,600 in December 2015. I was lapse and wrong in not doing so although I did register some payments. I do not know why – perhaps I thought I had done so already – but I should have done so.

I simply made honest mistakes. I really had nothing to gain by so doing. However, I accept full responsibility for being slack and I apologise absolutely.

With best wishes,

Yours Faithfully

Bob Stewart

Office of the Parliamentary Commissioner for Standards

Highly Restricted: Parliamentary Commissioner for Standards

Colonel Bob Stewart MP
House of Commons
London
SW1A 0AA

By email only

20 February 2024

Dear Colonel Stewart

Thank you for your response dated 16 February 2024, which has raised a further question. In your letter you have told me that you received a payment from Ksantex in 2015 of £45,600 'per annum'. Please clarify the following:

Please confirm which of the following is the correct position. Did you receive from Ksantex:

- a) A payment of £45,600 in December 2015 in addition to monthly payments of £3,000 for your duration with Ksantex (February 2015 to sometime in 2017) **or**
- b) Only one payment of £45,600 in December 2015 and no other payments for your duration with Ksantex?

If the correct position is b) the please explain why you told me the following in your response dated 29 January 2024:

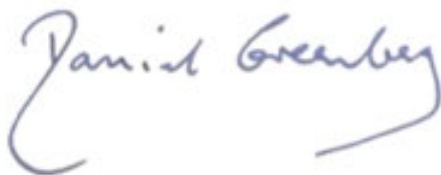
Q: Please confirm that you were paid £3,000 per month for the duration of your roles for both VES and Ksantex.

Answer: Yes that is correct.

Please ensure that your response is received by **10am 22 February 2024**.

This correspondence remains protected by parliamentary privilege, and I must ask that you maintain the strict confidentiality of the inquiry.

Yours sincerely



Daniel Greenberg CB
Parliamentary Commissioner for Standards

House of Commons London SW1A 0AA
standardscommissioner@parliament.uk
020 7219 3738 Text relay: 18001 207 219 3738

Independent | Impartial | Thorough | Fair

From: STEWART, Bob
Sent on: Tuesday, February 20, 2024 11:47:09 AM
To: Standards Commissioner
Subject: LETTER RECEIVED BY E MAIL ON 20 FEBRUARY 2024

Dear Commissioner,

I am out of the country at the moment but hope my response by e mail in reply to your letter is acceptable.

My net income from Ksantex SARL for the consultancy work was Euro 45,600/pa, which makes it Euro 3800 per month. The average exchange rate in 2015 was £1 = Euro 1.377. It can be concluded that I received £2758/m, not even £3000 I estimated in my statement. I did not receive an additional £3,000 a month as well.

With best wishes,

Bob Stewart

Bob Stewart
MP for Beckenham
(Bromley Common, Coney Hall, Copers Cope, Eden Park, Hayes, Kelsey, Keston, Shortlands and West Wickham)
Westminster Office: 020 7219 7011
bob.stewart.mp@parliament.uk

Office of the Parliamentary Commissioner for Standards

Highly Restricted: Parliamentary Commissioner for Standards

Colonel Bob Stewart MP
House of Commons
London
SW1A 0AA

By email only

26 February 2024

Dear Colonel Stewart,

I had been hoping to conclude this investigation shortly but unfortunately your email response to the draft memorandum, rather than clarifying outstanding issues, has raised significant additional concerns.

In essence, what you previously represented as a monthly payment of £3,000 in respect of providing a course of occasional lectures is now being represented as a single payment of €45,600, paid some months after delivery of the first lecture. Your email appears to be suggesting that these are the same payments and that you were previously estimating a monthly payment of £3,000 as a de-aggregation of an annual payment of €45,600. This is the first time you have represented the figure of £3,000 as an estimated de-aggregation of a single payment, and you raise this now as an explanation only sometime after I had discovered and put to you a €45,600 payment that you had previously not mentioned.

In the interests of trying to conclude this investigation which has already taken longer than I, and I am sure you, would have liked, I think the most efficient course of action is to ask you to attend for a second interview, for which I ask you to prepare by reference to the matters that I set out below.

Payment from Ksantex

During the interview I will be focusing on the following points:

- a) You confirmed in your letter of 29 January 2024 that you were remunerated at £3000 per month for your role with Ksantex. However, you have now indicated that Ksantex paid you €45,600 per annum. Your evidence is that you worked for Ksantex from February 2015 to approximately June 2017. This interview is intended to clarify exactly what you were paid by Ksantex and when, and for what purpose.
- b) You have told me that you did not have a contract for your work with Ksantex. At interview I will require you to explain how the payment amount and timing were agreed upon.

Paragraph 12 of the Code of Conduct

Paragraph 12 of the Code of Conduct 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."

I accept that you have responded to my questions promptly throughout this inquiry. Regrettably, however, a number of your responses have been incomplete and inconsistent with your earlier submissions. At times, your evidence has also been in direct contradiction to other evidence I have obtained. Your latest email is such a fundamental contradiction of earlier evidence on a key point of my investigation that I now feel it necessary to extend the scope of this inquiry to include a potential breach of paragraph 12. In order to assess your cooperation with my inquiry, I therefore propose at the interview to invite you to explain, in addition to the matters set out above, the inconsistencies and alterations that I had previously been content to list as unresolved matters in the draft memorandum that I showed you and that I list below.¹

- In your self-referral email to me on 21 June 2023, you told me you were involved with VES Consultancy from 2012 to 2015. In your response letter to me dated 6 July 2023 you told me that you became involved with VES in July 2010 and your involvement ended in October 2011. You have not been able to provide any documentary evidence to support this or given me any explanation as to why the role ended in October 2011.
- During the course of this inquiry, you have told me that you were paid £3,000 per month for the duration of your role at Ksantex. You also confirmed this in your letter to me dated 29 January 2024. You have recently told me that you received a payment of €45,600 per annum for this role but only received one payment.
- Your initial position has always been that you were paid by VES Consultancy UK for your first role. When it was pointed out to you that this was a dormant company you told me that you were in fact paid by VES Azerbaijan. Failing to find any information on VES Azerbaijan, I requested further clarification from you. It was at this point that you told me you were actually paid by Vnesh Expert Service, which you say was a company founded by Mr Bashirov. You have not provided any documentary evidence to either support your position that you were paid by Vnesh Expert Service or that Mr Bashirov has any connection to Vnesh Expert Service. Mr Bashirov in his interview to the media does not mention Vnesh Expert Service but confirms you were employed by VES Consultancy UK and Ksantex.
- Mr Ahmadov (current CEO of Ksantex) stated he is not aware of any seminars being provided by you during his mandate, which commenced on 1 February 2017. You have told me that you provided seminars on the following dates; 4 April 2017, 5 June 2017 and 17 July 2017 and attached a record of seminars on these dates.

¹ Not all the Outstanding Issues highlighted in the memorandum are included here as I do not propose to consider them when assessing any breach of paragraph 12

- In your written response to me on 6 July 2023, you told me that you stopped working for Ksantex in September 2017. Mr Ahmadov provided a document showing that you resigned as a director of Ksantex on 8 June 2017. However, you have provided documentary evidence to show that you provided a seminar on 17 July 2017.
- You told me that he had provided approximately 6-7 seminars annually. In addition, you have provided documentation which shows that you facilitated 16 seminars from 9 March 2015 to 17 July 2017. When asked who attended the seminars provided during your tenure with both VES and Ksantex, you stated in your correspondence of 29 January 2024 that the attendees were attending remotely from Azerbaijan, but you were unable to recall their names. However, during the interview I conducted with you on 22 August 2023, you 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."*

I remind you of your obligations under paragraph 12 of the Code, and to encourage you that before the next interview you undertake a very careful and thorough search of all relevant documents, and clarify your recollections as far as possible, with a view to enabling you to explain the apparent gaps and inconsistencies in the evidence so far. I will rely on this evidence to determine whether there has been a breach of paragraph 12.

Additionally, of course, if your explanations of the inconsistencies require me to revisit the substantive findings as set out in the draft memorandum that I sent you, I will embody my conclusions in a new draft memorandum on which you will have an opportunity to comment.

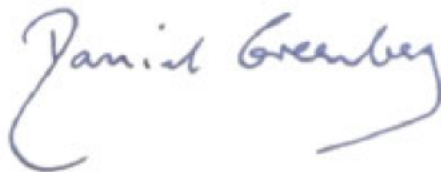
What you need to bring to the interview

Please look through your records or alternatively contact the relevant institutions to obtain documentary evidence to support your responses to the above. This may mean you need to contact Ksantex directly. I also specifically need bank statements or other financial records to show the exact payments you received from Ksantex.

My Office Manager [REDACTED] will be in touch shortly to arrange a mutually convenient interview time with you.

This correspondence remains protected by parliamentary privilege, and I must ask that you maintain the strict confidentiality of the inquiry.

Yours sincerely



Daniel Greenberg CB
Parliamentary Commissioner for Standards

Tuesday 19 March 2024

Colonel the Rt Hon. Bob Stewart DSO MP interview with OPCS

DG: The transcript will be provided to you in due course the same as last time and a copy of the recording will be held securely in accordance with the House's data protection policies.

DG: OK. So when we last met, I had not expected that it would be necessary to hold a second interview, and it's rare to have to revert to an interview at this stage, when we've provided the respondent with the draft memorandum, so I want to explain why we're doing this.

DG: In your response to the draft memorandum, you told me that Ksantex had paid you €45,600 per annum. That was your phrase and that was in direct contradiction of your earlier reference that you received a monthly payment, in respect of the provision of training. At no point in the earlier investigation had you made any mention of a payment of €45,600. I discovered that from the evidence of the current Ksantex CEO.

DG: Because the amount and timing of payments are central to this investigation, that is why it's essential for me to have clarity in relation to them. As a result of this contradiction in evidence on such a central issue, adding to some other inconsistencies that we will come to that have already caused me some concern, I reluctantly formed the view that your earlier answers to my questions may have failed to comply with the requirement in paragraph 12 of the Code of conduct to cooperate with my investigation, and I further decided that it was justified and proportionate in accordance with the procedural protocol to extend my investigation to a possible breach of Rule 12. So this interview is your opportunity to explain why this and other inconsistencies in your evidence are not failures of cooperation. I'm also going to take this opportunity to ask you about the other apparent inconsistencies in your evidence and again give you the chance to resolve any conflicts in the evidence that I've gathered so far, and it will be an opportunity for you to say anything further to me that you want to put on the record.

DG: To start with, are there any documents that you have brought to support this interview that you want to break off and present at this stage, or do you want to refer...

BS: I've got my bank account to show you. Let's start with the 3000, to be honest, Commissioner, I thought I got 3000 in a month, which was what the agreement was. In fact, they didn't give it me 3000 a month. They gave me it in lump sums. And that is why I mucked up, because the first time I worked for Bashirov 2010 to 2011, an informal agreement, I got 3000 a month and it came into my bank account, and that bank account triggered me to put, you know, declare it. A second time, I thought it was 3000 again. Again, I wasn't looking at documents when I wrote my submission to you.

BS: Forgive me for that, but when I looked it's taken me a heck of a long time to get my bank accounts. I've got them now. It's actually a joint bank account with my wife and there are two payments in there, which total up if you divide them by the amount of time to 3000 a month. That is where I misled you. If I did mis..., I didn't mean to mislead you. I was doing my best after seven or eight years to remember, and of course the original one was 14 years ago or 13 years ago. So, I mean, I admit I'm not a great memory, but I've always thought that Bashirov, Khagani Bashirov gave me £3000 a month and that is where I thought. Now I have the bank accounts here.

BS: My bank account, this is my wife's and my bank account for three years 2015. I don't want to leave them with you but please because this is my wife's account too. But I would like to show you that the amount of money, they're both flagged was what I got and that's what. I was confused. I didn't mean to fib. I'm not a fibber. I didn't mean to obscure and not that. I had no reason to disguise this thing. What is clear to me that because I wasn't getting the money every month I failed to declare it each month, because of course I wasn't getting it, but I got it in two sums, it was like 2 1/2 years or something and it sort of totals up to, totals up to 73,000 or something, but it's 3000 a month roughly. And it was paid in euros and then converted. And those are my bank accounts there. There's no other payment from Ksantex whatsoever and there's actually, there was never, ever an agreement on money in in any form, written form.

BS: Bashirov hired me again in 2015. I mucked up when I first wrote to you. I thought I was working from 2010 to 2015. It was a mistake. I wasn't. I ended it in 2011, October 2011. I've actually been more assiduous as you are.

More assiduous I know I work for Vnesh, for from about July 2010 to October 2011. Then I was sort of let go. Bashirov came back to me in..., it's all to do with this book that I wrote. That and I use the chapters in it for my presentations, which I've sent a copy of the photographic stuff to you. The real mistake I made, Commissioner, was not to declare from 2015 to 2017, but I wasn't getting money when I should have started declaring it. What actually confuse... I don't know. I really, I admit I mucked up. I should have declared it. I didn't declare it when the money was put in the bank and the bank there were two payments there, which I flagged up in, in my accounts.

BS: I didn't get 3000 a month. I thought in my mind I was getting 3000 a month, but it wasn't going to my bank account. It came in in two payments at the end of the year sort of thing. And that's I think possibly why I failed to declare it. I failed to declare it, it was stupidity. Slackness. And I accept I'm in the wrong. I didn't mean not to declare it cause in the first time I worked for Bashirov, I was assiduous in doing it every month when the money came into the account. I suppose that's probably why I didn't. It might be a reason why I didn't do it. I can't think of any other reason why I didn't. It was not in my interest not to declare it. I should have declared it. And I didn't, and that's as far as I can see. I've shown you my bank accounts, its three years' worth there.

DG: So just before I come to the bank accounts, I think it's very important we're very clear because you've mentioned this is a joint account.

BS: Yeah.

DG: I'll just consult with [REDACTED] here. I think it's very important to say there is no reason why any details of any payment relating to Colonel Stewart's wife should appear in any of the papers that [inaudible]. I think we will, we will form a view as to whether we want to simply note certain entries.

BS: I don't mind you keeping them, Sir. But can I have them back? Because this is my joint account with my wife and I've got enough to be honest, I've got enough problems on that score at the moment.

DG: No, absolutely understood. The reason why I wanted to just focus on this before we move on any further is I want firstly to assure you and I think this I can certainly do that the most we might want to reproduce in some form in anything would be the amount of those particular entries. Whether we do that as a, whether we photograph that one entry. But what I can assure, I think I'm right in saying [REDACTED] is that we will not have any other details of the bank account recorded or shown in any way in what we produce.

HR: No, absolutely not. And I don't think that we'd hold it either. My suggestion would be that it would be helpful if we, if you could leave it with us just for a little while, because I will need to get a team member to just verify, but then we can either, we won't scan it onto our system. But what we could do is either just hold this one copy. I'll keep it in the safe so it's not open to anyone apart from and then it would just take a little time just to kind of verify....

BS: It's taken me a heck of a long time to get from the bank. You know, that's why I couldn't meet you last week. I mean they promised me they were sending it and they didn't. And of course they charged.

DG: We will just note the entries we want. How do you want us to send you this back?

BS: Just in an envelope to me in this office.

DG: Right. OK, that's that is all very clear. Thank you. There will be some overlap and again the record of this interview will form part of the evidence bundle. We're going to have to redo that whole thing. We will rework the memorandum and send it to you again in draft to be checked and effectively we're going to redo that stage of the process.

DG: So I'm going to cover 3 topics. The payment from Ksantex, some of which you've just dealt with, but we'll do it in this fashion. I am going to put to you some other apparent inconsistencies in the evidence you've provided. And as I said a moment ago, the purpose of putting that to you is to give you an opportunity to resolve any conflicts and explain any conflicts in the evidence that I've gathered so far. And then, if necessary, insofar as necessary, I will also cover the specific question of the breach of paragraph 12, the cooperation requirement you have already talked about that just now.

BS: I didn't. There's no intention on my part to deceive.

DG: You've made that very clear. I'll decide at the end whether I need to go over that formally or not, just for the sake of the order of the record, but I will try. I am trying not to waste your time, so I'm trying not to go over things unnecessarily, but there will be some overlap. Please make your answers honest and full recollection as much detail as you remember. Don't worry if it seems trivial, we'll decide later if it's relevant. If we ask the question and you're not sure of the answer, just say so. Some of the questions may appear repetitive or overlapping. But please answer each one in full. Please take as much time as you need and please obviously make sure that your answers are relevant to the question that I ask on each occasion. If a question isn't clear, if you don't hear it clearly, please tell me. If you need a break at any time for any reason, please tell me. And of course we will accommodate any break that you need. If we need to pause the interview, then we'll tell you.

DG: So I'm going to start asking questions about those 3 topics. Is there anything you'd like to say or ask before I begin those questions.

BS: No.

DG: I'll remind you again that the investigation is confidential. OK, so payments, the payment from Ksantex. In your letter of 29th January 2024, you confirmed that you were remunerated at £3000 a month for your role with Ksantex. You've now indicated that Ksantex paid you €45,600 per annum and your evidence is that you worked for Ksantex from, approximately from February 2015 to June 2017. What we need to do now is we're going to clarify exactly what you were paid by Ksantex and when and for what purpose. And I'm going to do that by asking you a series of short questions, some of which return to matters we previously addressed with the aim of giving you an opportunity at this point to provide a single explanation of the payments and the purpose. So what were you paid by Ksantex?

BS: I thought it was about £3000 a month. The actual amount was that I received £32,277.87 on the 14th of December 2015 and another amount of £41,385.20 on the 18th of September 2017. I added those up as £73,663.07. And my rough calculations for dividing the time I work for them by that was £3000 a month and that's where the 3000 came from and the 3000 was in my head because that was what I was paid for, paid by, in 2010, 2011.

DG: Thank you. And when where you paid, you've dealt with that. Yeah. If you've answered that. What was the purpose of the payment?

BS: Well. You said I was a, well, I wasn't a non-executive director. They called it director, remember, it's written in Luxembourgish. But I was a consultant. And what Bashirov wanted me to do was to talk periodically about how this book I've written was for business. On business principles. He liked what I did first in 2010, 2011, but I'd run out. Vnesh was a small organisation, Ksantex, it's a bit bigger I think. And what I was asked to do was to talk about things like morale, teamwork, planning and that sort of thing. And I did. And of course, I used a lot of photographs, so it involved the internet whenever it was, they set that up. I did it in an office off Berkeley Square, which was the Ksantex office. There were one or two people there normally. And I normally spoke to people who I didn't know. Somewhere in, I presume, Azerbaijan. I didn't know their names because you're gonna ask me who they were. I had no, even, I mean, even at the time I wouldn't remember their names because they were strange names.

DG: So there were a couple of people there?

BS: Well, one or two people normally in the office and others are out. Yeah. And they provided coffee and drinks. Biscuits maybe.

DG: Thank you. How was this all agreed without a formal contract?

BS: Well Bashirov, I'd worked for Bashirov before he, I presume, watched one of my performances from Luxembourg and he liked it. I did it in English. Sometimes someone might have translated. I don't know, but it was very visual. Lots of pictures. It normally lasted 40, 45 minutes. There weren't many questions actually. I liked doing it, Commissioner. It was what I earned a living doing prior to becoming an MP. I didn't really do it for

money. I guess I did. But I didn't care. It was an enjoyment and it was I'd written I'd done a lot of packages like that, so it wasn't even a big imposition on me. And that's what I did.

DG: Thank you. What I was trying to get at was without a formal contract how was it actually agreed? What was the mechanism for agreeing?

BS: Bashirov really let me have carte blanche actually, there wasn't. He'd seen presumably what I'd done 2000 and 2011 and I think they wanted a repeat. I mean, there wasn't a contract in 2010, 2011. I don't think there was a contract on money terms in 2015 to 2017. And I worked for Bashirov, Khagani Bashirov, who I met a couple of times. He owned the companies, you see, he owned Vnesh Express Services. And he owned, you know, Ksantex. They were his companies.

DG: Without a contract or agreed terms, how did you know what you could be asked to do for the payment? How did you know what the payment was?

BS: He told me. He said just present. You know what you think of. I mean this, I kept on holding this book up, but I didn't show him. I'm sure he's never read it. But you know, it was on which I based all my work on, on it. And you know on each of the chapters comes a presentation. I worked for him and I didn't really go much. I think I went once to Luxembourg, for a dinner.

DG: Once you've been paid and there was no contractual obligation on you [inaudible], what discussions did you have with Ksantex to ensure that you would continue conducting the seminars?

BS: Sorry I didn't. I didn't really, I mean the...Someone rang me and said can you do something? Yeah. And I didn't even know who it was. And I said, of course, you know, because my usual rate before I was an MP was £3000 a lecture. So things didn't change in that respect in money terms.

DG: Yeah and so the payment was provided to you after the time when you explained the seminars started for Ksantex.

BS: Yeah.

DG: Do you know why that was?

BS: No, I mean, that's why I'm confused. Because, to be honest it's seven or eight years ago. I remembered it was 3000, 3000 is in my head. That's why I'm mucked up when I said, I presumed it was 3000. I didn't even realise I wasn't getting it but now when I look back now, I slightly understand why I was stupid enough not to declare it, because actually each month it wasn't coming into my account. And I'm at fault. I accept that, and I'm sorry.

BS: And one of the questions you asked me, Sir, was Vnesh UK, I thought it was Vnesh UK, but the whole company Vnesh is a group of companies. Where the money came from I didn't even look at it. You know, I really didn't look at it. It just appeared in my bank account.

BS: And that's it. So when I wrote to you and I said Vnesh UK, I presumed it's UK because there was an office here and you said it was a dormant company. Well dormant companies don't provide money. It was the group that did it.

DG: Yeah.

BS: And I didn't even know it was a dormant company.

DG: I have to ask formally why you did not tell me at the beginning of the investigation that the payment was provided after the seminar started and you disclosed that when I asked you about the payment of....

BS: To be honest, I had forgotten or didn't realise. I mean the figure 3000 was in my head. As I say, the money wasn't something I was primarily motivated about. I like the people. I didn't mean to deceive you, Commissioner, I really didn't. I produced the evidence that I thought, I thought immediately I was paid £3000 a month. Well I was,

but it was not at the time, it was retrospective and that's probably why I slightly mucked up. I don't know. I mean, I'm mea culpa I'm at fault. I certainly didn't mean to, certainly didn't mean to deceive anyone.

DG: Apart from the two payments that you've mentioned today. The payment of £32,000, and the payment £41,000 so that's 14th of December 2015 and 18th of December 2017. Apart from those two payments, are there any other payments from Ksantex that you have received?

BS: No. And, if you have a scan through my bank account. My joint bank account. You'll see there's no other payment.

DG: Thank you. That finishes my questions on the payment. So that's the first block of questions. [REDACTED], is there anything you would like to follow up on this?

HR: Just one, what discussions do you recall around why these payments will be paid in two lump sums?

BS: To be honest, I can't remember. I mean, it wasn't, it wasn't a discussion I had, actually. I wasn't looking to do it just for £3000 a month lovely amount, but I wasn't doing it thinking of that. I was just doing it because I enjoyed doing it and it took me back to the old days actually. And I quite like talking to people. And it's certainly, I never even ever discussed... they asked my bank account details and I gave them my bank account details.

HR: I see. That's everything from me.

DG: Thank you. OK, I'll need to move on to the other inconsistencies, unless there's anything else that you want to say on the first question.

BS: No.

DG: OK. At this point, I'm going to, [REDACTED]s going to pass you a sheet and I'll explain why. I'm going to put some inconsistencies, some apparent inconsistencies to you. And the questions I'm going to ask are quite complicated and I didn't want you to be having to follow what I was saying. Yeah, I want you to be able to follow it on the page.

BS: OK.

HR: Might be helpful to say these were all in the letter that were sent.

DG: So I'm going to go through each one and then as I said, this is your opportunity to explain them and I accept that you've already been asked to respond to some of these. This is the, I hope, the last occasion which will be necessary to ask you to provide an explanation. I will put each inconsistency to you at a time and opportunity for you to respond to each individually.

DG: So, firstly in your self referral e-mail to me of 21st of June 2023, you told me that you were involved with VES consultancy from 2012 to 2015. In your response letter to me of 6th July 2023, you told me you became involved with VES in July 2010 and your involvement ended in October 2011. You haven't been able to provide any documentary evidence to support this or give me any explanation as to why the role ended in October 2011.

BS: Well, I was involved with the companies twice, Commissioner. First when I was first an MP, when I seem to be more assiduous, frankly, 2010 and 2011. And then I was involved again in 2015 and to be honest, I was, I seem to think that I was involved right the way through. I didn't do anything. So my point that I was involved in consultancy from 2012 to 2015 is incorrect and I was wrong. And I apologise for that. I was clearly wrong. I wasn't involved with them, but in my mind, I kind of was.

BS: But I didn't do anything and I didn't get any payment. But the July 2010 to October 2011, I think I declared properly then I think I declared properly. I haven't got documentary evidence because that's not how Bashirov operated and the role ended in October 2011. I think he'd had enough of me. You know, they got what they wanted. Why should they give money out? For nothing.

BS: So in answer to that question, firstly I was wrong, I'm sorry. I wasn't involved. 2012 to 2015.

BS: Secondly, I did actually declare properly. And documentary evidence I have now. Because Bashirov didn't give me any. And the role ended. Because I think I finished. I think I'd done all the chapters, actually.

DG: Thank you very much.

HR: Can I just check so, but where has the date October 2011 come from?

BS: Well, I think it's when I last. That's when I ended I think.

HR: No, I understand that. But what have you based that date on?

BS: I don't know. I thought that was when I finished declaring.

HR: I see. Yeah, I think I'm just having a look. We have got an evidence bundle for you here, if you would. So this is the evidence we've got so far if you would like to peruse.

BS: I think that's when I ended.

HR: OK, I think what I'm getting at is that having a look, just looking at the initial letter that was sent to you and I believe it says that, OK, so you registered a payment from VES in July 2010 and then the reference to the role remained on the register until March 2012, with the last payment being received from VES Consultancy in October 2010. So if it hasn't come from the register, do you remember where you've got this date of 2011 from?

BS: No, sorry.

HR: As the Commissioner said if you don't remember that's fine. We just need to be really clear. Thank you. Yeah, as the Commissioner said, if you don't recall or you're not sure, it's really important you say. Yeah, that's everything for me. Thank you.

DG: Your initial position has always been that you were paid by VES Consultancy UK for your first role. When it was pointed out to you this was a dormant company, you told me that you were in fact paid by VES Azerbaijan. Failing to find any information on VES Azerbaijan, I requested further clarification. It was at this point that you told me you were actually paid by Vnesh Expert Service, which you say was a company founded by Mr Bashirov.

BS: It's the same thing, I think.

DG: OK, you haven't provided any documentary evidence either to support your position you were paid by Vnesh Expert Service or that Mr Bashirov has any connection to Vnesh Expert Service. Mr Bashirov, in his interview to the media, does not mention Vnesh Expert Service, but confirms that you were employed by VES Consultancy UK and Ksantex.

BS: Well he's probably confused. That's Vnesh Expert Services from the Internet, which is a company. You can have that.

HR: Thank you very much.

BS: He owns Vnesh Expert Services VES. It's got very big companies in Azerbaijan and it's quite a, it's quite a very a well-known company in Azerbaijan. At the back you'll see some of the companies, including British companies that it deals with, OK. Again, Bashirov didn't mention it, but he's definitely, he's the guy that owns it. Or, you know or was. There's been some jiggery pokery in Azerbaijan because Aliyez has tried to take over the company, the President.

BS: OK, so when I said VES Consultancy UK, that's what I assumed it was when I pointed out it was VES Azerbaijan I presume it was VES Azerbaijan because I was talking to people in Azerbaijan. Vnesh Expert Services is the long title. And I understand that's where the money came from. Group of companies owned by Bashirov.

DG: Thank you.

HR: How do you know that Mr Bashirov owns this company?

BS: Well, I don't. Yeah I'm told that he does. He told me. Or, you know, I understand he owns it. I mean, that's who paid it. And he organised it and I presume he was, you know, to be honest, it's difficult to get information out of Azerbaijan. That I got off the internet. Bashir... to my information and I'm talking about member of my office Dr Reza Tabrizi who speaks the language. Bashirov definitely owns Vnesh.

HR: Just to make sure I've understood, so have you been told by Mr Bashirov that he owns Vnesh Expert?

BS: Well, I can't remember.

HR: OK. But Mr Tabrizi has told you.

BS: Yeah. Yeah.

HR: Thank you. That's very helpful.

BS: If he doesn't own it, why the heck is he giving me three? You know, I mean, I'm just, just confused if that's... People don't give up that sort of money.

DG: Yeah. Thank you very much. Mr Ahmadov, so this is now I'm moving to the third bullet point in front of you, Mr Ahmadov, who is the current CEO of Ksantex, has stated that he is not aware of any seminars being provided by you during his mandate which commenced on 1st of February 2017. You have told me that you provided seminars on 4th of April 2017, fifth of June 2017 and 17th of July 2017 and you've attached a record of seminars on those dates.

BS: That's true.

DG: So,

BS: and that was Bashirov working. I didn't work for Mr Ahmadov. I never saw him. I think I might have met him once. But didn't work for him. I worked for Bashirov, who had his own people. Who set up these things in the office it was. He wouldn't necessarily have known that was happening. Bashirov is quite a strange character full of life. Brilliant. And hail fellow well met. Doesn't necessarily operate with much paper. Obviously, and I work for Bashirov. Bashirov is the guy that ordered me around, asked me to do things. That's what I did. He paid and I cooperated. That's what I did.

HR: When you say ordered you around asked you..

BS: He didn't order me around. But you know he was the guy that wanted me to do it. He didn't order me around. Sorry, that's. My wife does that. Order me around.

HR: When you say asked you to do things?

BS: Yeah.

HR: What things?

BS: Well, things was that? It was always the presentations. I wasn't ever on a board. I never went to a board meeting. I never made anything on. There was some contract they said I was a non-executive director. I don't think I directed anything. It was their way of saying I was a consultant.

DG: Pause on that for a second. There was a contract that described you as a non-executive director. And I think you used before. You used the phrase sort of Luxembourgish.

BS: Sorry.

DG: You used the phrase before this afternoon that it was Luxembourgish.

BS: Yes I presumed it was.

DG: There's a proof... there was a contract that described you as a non-executive director. And you'll say that that was their way of desc... of saying that you were a consultant, giving lectures,

BS: I presume so. Well, I wasn't ever. If there, I would never ever attended any board meeting or any meeting whatsoever. I was a freelance. We went in and did these presentations when asked. That's it. And I would not describe myself as a non-executive director. The contract may have described it, but I wasn't. I was, I would describe what I was, which was a consultant to provide leadership training.

DG: I just want. Are you gonna, I mean. Does that, with hindsight, not appear to you slightly unusual.

BS: Yeah. Well, it's not unusual. I don't know. I've never operated in Luxembourg before or in, you know, the contract, as I understand, was in French, not great at French.

DG: Yeah

BS: I didn't mind what they called me. As long as I did what I thought I was gonna. You know, they didn't ask me to do something I couldn't do. So I wasn't actually concerned about it.

DG: No, I can see that I can see that I'm and I say I just want to tease this out a little bit, because with hindsight. I mean.

BS: With hindsight, Sir, I should have said, could you change that word to consultant? But I didn't.

DG: No, I mean, I'm just trying to get my head around this because, OK, this is Luxembourg. Luxembourg isn't, it's not. Companies in Luxembourg operate in a similar way and if a company was contracting someone to give a series of seminars. I'm genuinely struggling to see why in any language you wouldn't put a contract to say we're contracting to give same.

BS: I do not say.

DG: [unclear] That. I'm just. I'm just saying. Again. If I want to.

BS: I mean, I don't think Bashirov was in any way involved in that contract.

DG: Yeah,

BS: I doubt Bashirov saw that contract. And sure as heck, I didn't really consider it to be binding on me 'cause I knew what I was doing. As directed by Bashirov and I think Bashirov probably never saw that contract. It's done by people, other people. And I wasn't particularly concerned about being a non. I've been a non-executive director before, but it certainly wasn't the same way as this which was a consultant. And I honestly thought it was probably. The way they do it in Luxembourg. I certainly didn't do anything.

DG: No,

BS: Apart from provide these lectures.

DG: Yeah,

BS: I think I went to a dinner. Once.

DG: And when was it you went for dinner, was that part of. Was it related to

BS: When I was visiting. Actually.

DG: Yeah. It wasn't dinner relating to a board meeting or anything?

BS: No, no, it was just, you know, just a dinner.

DG: And you mentioned before that you said you never saw Mr Ahmadov and then,

BS: Well, I I've checked on that. I've checked with Reza Tabrizi, he said you've met him.

DG: Yes.

BS: But, you, I can't remember him.

DG: No. OK.

BS: And it was at that dinner I think.

DG: I would. That's what I was wondering.

BS: Yeah, probably at the dinner. And it certainly wasn't for business. Bashirov was there.

DG: OK. Alright, I think I've probably exposed that. I know, expose what's troubling me as much as I can and I think you've.

BS: I'm sorry. I wish I'd not, they'd not use that term but they did.

DG: Yeah. OK. And I think we've probably taken that particular issue as far as we can, OK. The next bullet point. In your written response to me on 6th of July 2023. You told me that you stopped working with Ksantex in September 2017. Mr Ahmadov provided the document showing that you resigned as a director of Ksantex on 8th of June 2017. But you've provided documentary evidence to show that you've provided a seminar on 17th July 2017. So we've got three statements there that are. Not entirely consistent. Can I ask you to respond to those?

BS: Well, firstly, I didn't actually care whether I was employed or not. They were nice people. I enjoyed doing it. I didn't even. I can't even remember realising I stopped working for them. Clearly I had. But it wouldn't have made any difference to me. I just still gone and presented because I enjoy doing that sort of thing and that's what I do. And that's what I did. I did it in the London office. I didn't, but they're all done in the London Office, which is not a particularly nice office behind Berkeley Square. So I mean, I don't think I can't remember that I stopped working for them. I thought they were decent. Good. As I say, the money wasn't actually something I kept an eye on. If I had it done, I'd have been a damn sight more assiduous and declared it. My mistake was not to declare it when those lump sums came in because I just that's a mistake.

DG: Yeah. Just when you say you can't remember that you stopped working for them particularly. So the document that Mr Ahmadov provided, showing that you resigned as a director on 8th June 2017. Is it? You just don't remember anything about it?

BS: Just don't remember. I'm not even sure I signed it. You know. OK. And perhaps I did, I don't know the. The fact of the matter was it didn't really worry, particularly worry me.

DG: Yeah.

BS: I mean Reza Tabrizi works in my office. Who I would like to have brought with me because he was the brains behind it. He said just go do it, you know.

DG: Just go and do what?

BS: Just do just do presentation if you want to. The presentations normally came through him.

DG: Yeah.

BS: Said do you want to do a presentation, can you do it? Is it after parliamentary time? Yes, I'll do it then, you know, walk up there. He was present whenever I did a presentation.

DG: And it was. It was Mr Bashirov who asked for the presentation.

BS: Well, he spoke to. They're very good friends.

DG: Who would he speak to.

BS: But Bashirov is very good friends with Dr Reza Tabrizi, who he's known since the 80s. Well, 90's that's how I got involved actually. And that's why it's so informal. Presumably.

DG: Yeah. You haven't. You say there was no. You've said there wasn't a contract apart from this one contract describing you as a non-executive director and you've told us all about that. You weren't. There weren't a lot of other documents?

BS: No

DG: And but this the resignation documents you it just I mean

BS: To be honest, Commissioner, can't even bloody remember it.

DG: Yeah.

BS: You know, I just can't remember it.

DG: Yeah. OK.

BS: It was Bashirov. It was Reza Tabrizi, and Bashirov that were my guiders on this and Dr Reza Tabrizi, I would trust with my life, actually.

DG: Yeah.

BS: I've known him since 2005.

DG: Helen, anything on that?

HR: No, nothing for me thank you.

DG: OK. Last one of these. And then we are nearly done. You told me that you had. Sorry. You told me that you had provided approximately 6 to 7 seminars annually. In addition, you've provided documentation that shows that you facilitated 16 seminars from 9th of March 2015 to 17 July 2017. When asked who attended the seminars provided during your tenure with both VES and Ksantex, you stated in your correspondence of 29th January 2024 that the attendees were attending remotely from Azerbaijan, but they were unable to recall their names. However, during the interview I conducted with you on 22nd of August last year. You 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 going to 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. So there's a little bit of inconsistency there as to whether this was people attending remotely or it was people coming in physically.

BS: Well, I think it was both, actually. When I come into the office, there was sometimes more people there than were, you know, we'd have a drink, coffee normally, tea, biscuits. Some would, some would peel off, some might show some interest. As far as I was concerned, I just they set up the screen, I put a memory stick in with what it is, and then I did it. I don't know how much people at the far end understood, but I tried to do it with lots of pictures.

DG: Yeah.

BS: It isn't inconsistent. There were other people in the office. People that were listen probably one or two there might have been other people there visiting from Luxembourg or wherever. Ksantex is based in Luxembourg City.

DG: OK. Thank you very much, [REDACTED] anything you would like to add?

HR: No nothing from me.

DG: OK, so looking at those inconsistencies overall, is there anything else that you would like to say to help me to understand why there have been internal inconsistencies in your evidence as the investigation has proceeded?

BS: Well, all I could say is, Commissioner, I'm very sorry. It's a long time ago. I did my best when I self-reported myself to you. You know, immediately I self-reported, you know, I got a few things wrong like 2012 to 2015. I did my very best to check out things, but I'd there wasn't much documentation for me to go back on. The big mistake I made, I think, was not to declare working for Ksantex. That's my mistake. The rest of it I hope I can explain, but I really feel. I should have declared. And as I've explained, maybe it was because I didn't get it monthly that I didn't declare it monthly. And then. I was remiss in not declaring it. When I did get it because, frankly. I don't know why. Was not a sin of intention.

I did not wish to deceive anyone. I don't see what I would get out of not declaring it. I might have been idle. I might have been slack. But I was not trying to be dishonest. And uh, I understand the reason for declaring things. You know, I had a, you know. It was not a by the way. It wasn't a defence company at all. If it had of been, I'd been aware of that. So all I can say is I apologise profusely. I self-reported myself. I put my hand up when I realised I had mucked up. I did muck up. And I brought the record of to hopefully put the record straight as to the money I received. And you've got my bank statements. Forgive me. You can't forgive me, or you might forgive me, but you can't. I'm human. I dealt with all this stuff myself. I didn't. I'm not blaming my staff. This is my fault. My mistake and my responsibility. I should've actually used staff to do it, but I didn't. And I'm certainly not blaming my staff. I've had to rely quite a lot on Dr Reza Tabrizi, to remember. And it was through him that I worked for Bashirov directly. They are personal friends.

DG: I just want before we go on to the final thing. We I we need to be very careful here. You in the last couple of minutes of answers. You, started using the language of declaration and I just want to be very clear. I think you're still talking about registration.

BS: Yes I am yes.

DG: No. I just want to know.

BS: I mean. I'm slacking my language.

DG: I'm not. I'm not in any sense. I'm not.

BS: I should have registered this.

DG: I want to be sure what we are talking about registration and I don't think anything you've said is intended.

BS: It was registration.

DG: Thank you. [REDACTED] is there anything you want to add on that?

HR: No thank you.

DG: Thank you. OK, we will finally. Touch briefly as far as I'm concerned, I will so you take whatever time you feel you need. On paragraph 12, the Code of conduct, I've explained why I felt the need to extend the investigation

into paragraph 12, which is a requirement that Members cooperate with the Commissioner in the conduct of any investigation and obviously with the Committee on Standards and the Independent Expert Panel in any subsequent consideration. What is your view as to whether during the course of the investigation you have failed?

BS: Sought to obscure. No, I have not. My view is I've tried to be as honest as I can. I may have made mistakes. My memory is not brilliant obviously. I did not set out to deceive anyone. In fact, I think it would be appalling if I did. My honour is at stake, of course, at stake. I don't lie. I don't deceive. And if I've made mistakes, it's a mistake of honest intention, lack of understanding, lack of whatever. It has been very confusing. My relationship with Ksantex and with the other company VES. You're right, I didn't have proper paperwork. It was done almost on the old boy network. Which it was really. And my links to Bashirov were direct. He had his people throughout the companies. And actually I quite like the guy. So I had no wish to deceive. I had no wish to not help the companies. Both companies still exist. VES is quite big in Azerbaijan. If you look at the thing I've given you, it's got really big companies that it's working with at the back. And Ksantex does things like building projects and buying equipment to go to Azerbaijan.

DG: Yeah.

BS: And that is what Bashirov was all about. And he's been involved in this sort of thing for 30 years.

DG: OK. So would it, would it be fair to say that? You must put it in your own words. But I want to be clear. Would it be fair to say that you believe you have cooperated with the inquiry, with the investigation in the sense that you have not, you've said you had no wish to deceive and you've provided. You've tried to be honest and although you may have made mistakes in what you've provided to the investigation, you did not set out to deceive. Is that a fair summary?

BS: Yes, it is, Sir. It's actually. I tried my best at each stage to say what the facts were. You know, even the 2012 to 2015, I was involved, it was my memory. It was the fact that I was my best friend is Dr Reza Tabrizi, and he's always been with me and his link was to Bashirov. I didn't have any contact with Bashirov. I think I've met him twice. And I've tried obviously to contact these companies, VES and Ksantex. I don't know the staff, the people that run Ksantex at the moment. I do speak through Tabrizi to Bashirov. When I when you started, I said look, I need to need you to prove, for example, that, you know, Ksantex isn't a defence company and I did my best there. All the time I've tried to do my best. Cause the last thing I want to do is to lie to the Commissioner of Standards. That is the last thing I want to do. If I was the Commissioner of Standards, someone lied to me, I'd be really angry. End of. Whatever I have been at fault. I accept. I am sorry. I did not mean to be at fault. I'm an honest Indian. And in retrospect, I wish I'd never done it, but, you know, I mean get involved because it's caused me one heck of a headache. And it's worried me for the last nine months. Seriously worried me. Because people are suggesting the implication is that I'm dishonest. Well, I'm bloody well not. Sorry for my language, I'm not dishonest. Etcetera. Is that enough of a statement?

DG: It's you,

BS: Of course. I mean answer is that's my statement. I'm sorry.

DG: No, that's fine.

BS: If I made a mistake, it was a mistake of good in non-intention to deceive.

DG: Yeah. OK, that's very clear. Thank you. I have asked you whether there are any other payments from VES or Ksantex that you wish to mention now and you've said that there aren't.

Is there any further information of any kind that you would like to provide?

BS: No.

DG: OK if there is if anything occurs to you, you can always between now and when we send you a new draft memorandum, you can always send anything that occurs to you. We will handle the bank statements you've given

us. We will handle in the way we've discussed. We will extract the information we want nothing other than that information will appear in any information that we publish and the

BS: You'll return the bank statements?

DG: Hard copy and we will not keep a copy of the of the bank statements will extract the entries we need and the hard copy we return to you in the way we've discussed. A copy of the transcript of the meeting will be provided to you once we've once we've completed it. I will now rewrite the draft memorandum reflecting your responses today and you will be sent a new draft memorandum for factual accuracy checking in the same way we sent you the first one.

BS: Thank you, Commissioner,

DG: And that's how we will proceed, subject to anything else that you want to say, we will close the transcript.

Mr Daniel Greenberg CB
Commissioner for Standards
House of Commons
SW1A 0AA

01/09/2023

Dear Mr Greenberg,

Ref: The Rt Hon Bob Stewart MP

I am writing to you regarding your investigation into Colonel Bob Stewart MP's consultancy engagements with VES Consultancy and Ksantex.

Before I do that, I would like to give a brief history about my background and expertise.

After completing my PhD which was sponsored by RAE Farnborough, I started working at British Gas research station as a senior scientist (1989), and during my work with BG I was involved in the negotiations and the signing of the largest gas deal with Kazakhstan in 1992. From 1994 until 2000 I worked for one of Lloyds of London's largest insurance brokers as a consultant and at the same time, I represented the Office of the former President of Azerbaijan Heydar Aliyev in the UK. I attracted inward investments from major oil and gas companies, aviation, construction, chemical and mining sectors to Azerbaijan and was instrumental in signing over £800mln of foreign trades for British industries. In 1994 we needed to register the Lloyds' broking company's office in Azerbaijan, this is where I met Mr Khagani Bashirov. His company VES was number one company in the republic for registration of companies, notarisation of documents, translation etc. VES is still one the most successful companies in Azerbaijan.

In 2010 Mr Bashirov wanted to expand the operation of VES into Europe and other CIS republics. They asked me whether I knew anyone who could help them become a leader in their industry, this is when I recommended Mr Stewart being the commander of the UN forces in Bosnia saving tens of 1000s of lives and the writer of the book on leadership. After a few days they called me asking me whether I could approach Mr Stewart to work with them as a consultant and give presentations to their staff on leadership. I put the question to Mr Stewart and luckily, he agreed.

In 2015, Mr Bashirov contacted me regarding Ksantex. He asked me to help them in promoting the company and to introduce them to the governments of the CIS, Eastern Europe, Central Asia, and the UK. He also asked me whether we could use Mr Stewart's expertise in leadership as before. I discussed with Mr Stewart. He agreed to carry out the same work as he did for VES. Neither Mr Stewart nor I were involved in the operation of Ksantex. It is to be noted that Ksantex was not involved in any defence work. They were trying to secure projects such as construction of airports, runways, control towers, and secure contracts for bodycams. I am aware that their website was designed to attract business for airport construction, army bodycams, and although it did appear to be a military company, this was all for marketing purposes, nothing more.

I am attaching an email that I sent to the CEO of Ksantex on 27 February 2015 asking when Mr Stewart was due to start his consultancy role as he had to notify Parliament. This clearly indicates that he did intend to inform parliament, but we received no reply, and it now appears that he forgot about it.

Finally, I would like to add that Mr Bashirov was never imprisoned. His arrest was politically motivated and he was kept in custody for months for interview purposes. He has no criminal records neither in Azerbaijan nor in France or Luxembourg.

Yours sincerely,



Reza Tabrizi

Highly Restricted: Parliamentary Commissioner for Standards

Dr Seymour Ahmadli



By email only

24 October 2023

Dear Dr Ahmadli

Thank you for taking the time to make contact with my office.

I am investigating an allegation that the Member Rt Hon. Colonel Bob Stewart has not met his registration and declaration requirements under the Code of Conduct. These requirements relate to his role with Ksantex S.à.r.l, and prior to that VES Consultancy.

I am conscious that Colonel Stewart was working with Ksantex S.à.r.l from February 2015 to September 2017, but any assistance you can give me with the following would be really helpful.

1. Please explain the nature of Ksantex S.à.r.l's business presently and between 2015-2017. If the nature of the business has changed it would be helpful to understand the nature of any changes.
2. Please refer to the archived image of the website Ksantex SARL attached. This image is captured on 10 January 2016. The website states that Ksantex SARL can provide military equipment and weapon accessories and the homepage shows defence images.

On 20 March 2017 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**."*

Please explain to what extent, when and in what way Ksantex S.à.r.l has been involved with defence matters.

3. Please explain the nature of Colonel Stewart's appointment with Ksantex S.à.r.l.

4. I understand Colonel Stewart conducted seminars with Ksantex S.à.r.l.
 - a. Please provide the dates of each seminar Colonel Stewart delivered during his employment with Ksantex S.à.r.l.
 - b. Please provide details of venues at which each of these seminars were delivered.
 - c. Please provide training materials Colonel Stewart utilised for the delivery of these seminars.
 - d. Who attended these seminars?
 - e. What were the purpose of these seminars?
5. Could you kindly send us a copy of any written contracts between Colonel Stewart and Ksantex S.à.r.l, if available.

May I remind you that my inquiries are conducted in private. This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege and must be kept confidential until the outcome of my inquiry is published.

I would be grateful if you could provide this information by no later than **7 November 2023**.

Thank you for your assistance with this matter.

Yours sincerely

A handwritten signature in blue ink that reads "Daniel Greenberg". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel Greenberg CB
Parliamentary Commissioner for Standards

From: Seymour AHMADOV
Sent: 15 November 2023 13:16
To: Standards Commissioner
Subject: RE: Private and Confidential

Dear Sara,

Hope you're doing well. Sorry for my late reply I was waiting for feedback from past service providers, which you can imagine after so many years is extremely difficult.

1. Presently we provide project management services in different industries. For example, telecommunications, tactical equipment, clothing, and civil aviation. As far as I know from the accounting records before my appointment to the board the scope was the same.
2. According to the archived accounting documents I can see that Ksantex sold exclusively protective tactical equipment – helmets, masks, kneecaps, elbow caps, backpacks, glasses and clothes - belts, underwear, t-shirts. I assume that the web designer intended the images of a combat on the old website to simply illustrate such protective equipment and clothes. After thorough investigation I can certainly confirm that Ksantex never dealt directly or indirectly with military equipment or arms.
3. Sorry, but I have no idea why he was appointed to the board of Ksantex. Perhaps it was good for the credibility of the company to have British Colonel on the board.
4. I'm not aware of any seminars during my mandate. My mandate starts from 01.02.2017.
5. Please find the resolution dd 10.12.2015 and acceptance/resignation from board of directors. I can't find any contract or any mention of it.

Best regards,
Seymur.

CEO

[Redacted signature block]

www.ksantex.com



ksantex

RESOLUTION DU CONSEIL DE GESTION DU 10 DECEMBRE 2015

Les gérants de la société Messieurs [REDACTED] Mohammad Reza REZAI-TABRIZI, Robert STEWART ont pris ce jour les décisions suivantes :

Repartition des jetons de présence pour l'année 2015:

L'associé unique a décidé en date du 10 novembre 2015 d'attribuer des jetons de présence à titre exceptionnel aux membres du conseil d'administration pour l'année 2015 pour le montant global de € 114.000 (cent quatorze mille euros) à repartir entre les gérants-indépendants.

Le conseil de gérance décide de repartir des jetons de présence, comme suit:

Monsieur Reza Rezai-Tabrizi:

- 57.000 Euros dont 20 % de retenu à la source, soit un montant net de 45.600 euros

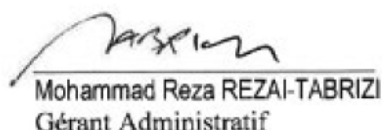
Monsieur Robert Stewart:

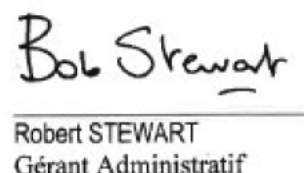
- 57.000 Euros dont 20 % de retenu à la source, soit un montant net de 45.600 euros

Monsieur [REDACTED] étant rémunéré mensuellement en tant que salarié ne recevra pas de jetons de présence pour l'année 2015.

Luxembourg, le 10 décembre 2015,


[REDACTED]
Gérant Technique


Mohammad Reza REZAI-TABRIZI
Gérant Administratif


Robert STEWART
Gérant Administratif

Ksantex S.à.r.l. [REDACTED]
Capital social [REDACTED]
[REDACTED]

RESOLUTION OF THE MANAGEMENT BOARD OF DECEMBER 10, 2015

The managers of the company, Messrs. [REDACTED] Mohammad Reza REZAI-TABRIZI, Robert STEWART, took the following decisions today:

Distribution of attendance fees for the year 2015:

The sole shareholder decided on November 10, 2015 to grant attendance fees on an exceptional basis to the members of the board of directors for the year 2015 for the total amount of €114,000 (one hundred and fourteen thousand euros) to be distributed between independent managers.

The board of managers decides to allocate attendance fees, as follows:

Mr. Reza Rezai-Tabrizi:

> €57,000 including 20% withholding tax, i.e. a net amount of €45,600

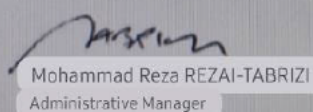
Mr. Robert Stewart:

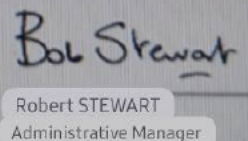
➤ 57,000 Euros including 20% withholding tax, i.e. a net amount of 45,600 euros

Mr. [REDACTED] being paid monthly as an employee, will not receive attendance fees for the year 2015.

Luxembourg, December 10, 2015.


[REDACTED]
Technical Manager


Mohammad Reza REZAI-TABRIZI
Administrative Manager

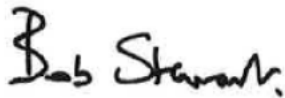

Robert STEWART
Administrative Manager

ACCEPTATION DE MANDAT

Par la présente, le soussigné STEWART Robert Alexander, né le [REDACTED]
[REDACTED] (UK) et demeurant House of Commons London SW1A 0AA, confirme
accepter le mandat de gérant administratif dans la société **KSANTEX S.à.r.l.**

Luxembourg, le 5 février 2015.

Signature :



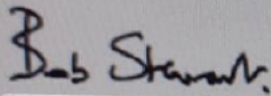
STEWART Robert Alexander

ACCEPTANCE OF MANDATE

Hereby, the undersigned STEWART Robert Alexander, born [REDACTED]
(UK) and residing at House of Commons London SW1A 0AA, confirms to
accept the mandate of administrative manager in the company KSANTEX S.à.r.l.

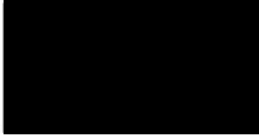
Luxembourg, February 5, 2015.

Signature :



STEWART Robert Alexander

Robert Alexander STEWART



KSANTEX S.à r.l.



RESIGNATION OF MANDATE

Hereby, the undersigned Mr. Robert Alexander STEWART, director of company, born [REDACTED] (United Kingdom), having his professional address at [REDACTED] United Kingdom, resign as director of the company **KSANTEX S.à r.l.** effective on the date hereof.

Luxembourg, June 8, 2017

Signature: 

Tory MP hid directorship at defence firm while sitting on defence committee

Exclusive: Bob Stewart failed to declare role at a defence firm linked to a controversial Azerbaijani businessman

[James Dowsett](#)



[Jim Fitzpatrick](#)

21 June 2023, 10:57am



Tory MP Bob Stewart failed to declare his role at a defence firm | openDemocracy via Wikipedia/Creative Commons and Westend61/Getty

Embattled Tory MP Bob Stewart hid his directorship of a foreign defence company controlled by a controversial Azerbaijani businessman while sitting on Parliament's influential defence committee.

An investigation by openDemocracy and the Organized Crime and Corruption Reporting Project (OCCRP) has found that Stewart failed to declare his role at the Luxembourg-registered firm.

A former member of Westminster's standards committee said the failure "looks like a clear and serious breach" of the rules.

It comes a week after Stewart, the Conservative MP for Beckenham, was charged with a public order offence over an alleged racially aggravated incident in December.

The latest revelations centre on Stewart's hitherto secret directorship of Ksantex SARL, a provider of defence equipment and advice, between February 2015 and July 2017. During this time, he was a member of the House of Commons defence select committee, which is tasked with overseeing the work of government on defence issues.

"It would be difficult to describe something which is more of a conflict of interest than this," the SNP's constitutional affairs spokesperson Tommy Sheppard told openDemocracy.

MPs are required to declare all relevant outside interests on the Register of Members' Financial Interests within one month of election and any changes to their interests within 28 days. Stewart failed to declare his position in the two and a half years that he was a director or at any stage since.

Parliament's own guidance states that the register's purpose is "to provide information about any financial interest which an MP has, or any benefit which they receive, which others might reasonably consider to influence his or her actions or words as an MP".

When asked by openDemocracy why he hadn't registered his interest in Ksantex, Stewart said: "I believe I had already registered my interest in that group of companies in 2012."

That year, Stewart did declare a consultancy arrangement with a separate company, VES Consultancy (UK) Ltd, where he earned £3,000 per month for the "provision of leadership/planning training and advice". Stewart's declaration said the work lasted for one year from 1 July 2010.

But there is no mention in the register at any stage of his two-year directorship with Ksantex SARL.

VES Consultancy (UK) Ltd, which was dissolved last year, didn't have any obvious corporate links to Ksantex SARL, so it was initially unclear why Stewart considers them part of a "group of companies".

But there is another significant person, beyond Stewart, who connects the two firms: a French-Azerbaijani businessman called Khagani Bashirov, who served time in jail in relation to an investigation into the disappearance of funds from the International Bank of Azerbaijan.

Commenting publicly for the first time, Bashirov confirmed to openDemocracy that he controlled both VES Consultancy (UK) Ltd and Ksantex SARL.

Shadowy connections

Bashirov was mentioned during the proceedings of the UK's first Unexplained Wealth Order (UWO), which was brought against the wife of Jahangir Hajiyev, the former chairman of Azerbaijan's state bank, in 2018.

UWOs hand authorities powers to investigate individuals, often corrupt foreign officials, who are suspected of having laundered stolen money through UK assets. They also ultimately ease the confiscation of these assets if the individuals are unable to explain the sources of their wealth.

In the 2018 proceedings, the UK National Crime Agency (NCA) named Bashirov as being connected to Hajiyev, who was jailed for 15 years in 2016 after being convicted of being part of a major fraud and embezzlement that saw tens of millions of pounds disappear from the International Bank of Azerbaijan (IBA).

The NCA revealed in a witness statement that Bashirov was also jailed in Azerbaijan in relation to an earlier investigation into the disappearance of tens of millions in local currency from the same bank. Bashirov served a four-month sentence from September 2010 to January 2011.

Bashirov confirmed to openDemocracy that he did spend this time in jail, but said he cooperated with the authorities in Azerbaijan and the NCA, adding that his "criminal record is clean everywhere".

He said his relationship with Hajiyev had soured because he (Bashirov) had worked with the Azerbaijani authorities to return bank assets to the state.

"Our relationship started to deteriorate in early 2013 and totally ended in November 2015," he said. "He told me that I had betrayed him."

Bashirov said he met Stewart "once or twice" and hired him to help with his consultancy business.

"I wanted to start providing economic consultancy services to my clients and the presence of such a consultant could be a great help to me," he told openDemocracy.

“

As an MP, [Stewart] should have declared this position. As an MP on the Defence Committee, the omission is even worse

Bashirov's time in jail in Azerbaijan overlapped with the period Stewart worked for his company, VES Consultancy, in the UK.

Stewart confirmed having met Bashirov while he worked for the firm. "I believe I met him socially twice during my consultancy and we certainly did not discuss business," he said.

Stewart told openDemocracy he had no knowledge of Bashirov's ownership of VES or links to Ksantex SARL and said he would have declined the consultancy if he had known and been aware of Bashirov's jail time.

He also said his role at Ksantex "was actually a consultant/non-executive director." He added: "I advised on business leadership/planning based on my 2009 book 'Leadership under Pressure' which was all about business. But I was not in any way involved in running the company or any decisions it made. I was totally unsighted on decision-making."

'A clear and serious breach'

The Tory MP told this website he hadn't known that Ksantex was involved in defence work, saying: "At the time I believed the business of the group was about construction and in no way defence-related."

But a simple check of the company's website would have revealed its true business. Although Ksantex currently describes itself as a "boutique consultancy firm", it was much more explicit about its defence-related activities when Stewart was a director. [An archived version of its website from 2016](#) says the firm offers a "wide range of technologies, tactical equipment and services".

It also lists selected tactical equipment, encrypted technology, recording systems and UAVs (drones) among the products it sold, naming several brands and manufacturers it works with.

Bashirov said Ksantex had never sold or bought military equipment but is "a consulting company in the field of civil and military radars". He confirmed that Stewart had been registered in Luxembourg as a non-executive director of the company.

Throughout his time with Ksantex, Stewart, a former British army colonel and UN commander in Bosnia, was an active contributor to defence debates in Parliament. He argued for [greater spending on defence](#) and secured a debate speaking in [support of the regime in Kazakhstan](#).

Breaches of the rules by MPs can be referred to the parliamentary standards commissioner, whose work is overseen by the committee on standards.

The SNP's Tommy Sheppard, who served for two years on the standards committee, said: "This looks like a clear and serious breach of parliamentary rules. As an MP, [Stewart] should have

declared this position even if unpaid. As an MP on the Defence Committee, the omission is even worse.

"Most people will find it astonishing that an MP sitting on a committee which in part scrutinises UK government defence procurement is at the same time a director of a company which sells defence equipment and advice."

“

MPs should be prevented from taking up any employment outside of their official roles

It's unclear if Stewart was paid by Ksantex. The company accounts make no mention of him and Stewart himself was unable to clarify the situation. Asked by openDemocracy if his £3,000 per month consultancy with VES came to an end in 2011, as the register of interests suggests, or if he was subsequently paid by Ksantex, he replied: "I'm not sure to be honest. I think my remuneration lasted for two years but then they had no further need of me."

One curious anomaly is that VES Consultancy (UK) Ltd was a dormant company during the time Stewart worked with it. Both Bashirov and Stewart described it as a "start-up". It is unclear how Stewart was paid by a dormant company.

'Transparency is only part of the solution'

Ksantex's archived website said it was registered in Luxembourg, often cited as a corporate secrecy haven, but had its main offices in London and Baku, the capital of Azerbaijan. It also reported having offices in Russia, Belarus, Kazakhstan, Georgia and Moldova (as well as a branch in Kosovo), indicating that it could give "support to companies bidding into programmes in these countries".

Although Stewart hid his role with Ksantex from Parliament, there was no hiding his parliamentary connections from Ksantex. "House of Commons" was listed as his address on his director's registration form in Luxembourg.

The connections between Stewart and the company also went deeper than his own directorship. His business associate and now parliamentary staffer, Reza Tabrizi, took up a directorship with Ksantex on the same day Stewart did, remaining at the firm until they both resigned in July 2017.

And Stewart's brother, Andrew, was a director and minority shareholder of Ksantex's UK subsidiary between 2013 and 2016. He is a former sales representative for the French multinational defence firm Thales in the UK.

Rose Whiffen, senior research officer at Transparency International UK, said MPs should be prevented from taking second jobs outside of Parliament.

"MPs are elected to serve the public interest. When politicians take second jobs, especially in sectors closely associated with their parliamentary work, this could create the impression that their actions are unduly influenced by the interests of their employer.

"At the very least, MPs should always be candid about their financial interests, but transparency is only part of the solution.

"Save for a few exceptions involving public service, MPs should be prevented from taking up any employment outside of their official roles," she said.

Links between the Conservative Party and controversial figures from Azerbaijan have been under scrutiny recently.

Last month the BBC revealed that a major donor to the Tories was a businessman whose foreign companies were part of a global money laundering investigation. And last year openDemocracy revealed that Conservative MP Bob Blackman boasted that he was “fed” propaganda by the Azerbaijani embassy and used it to lobby the UK government.

Tuesday 13th June

Dear Mr Stewart,

I'm writing an article for openDemocracy (www.opendemocracy.net) which concerns you and your role as a director of Luxembourg-registered company Ksantex SARL and I'm contacting you now in advance to give you an opportunity to respond so that can be reflected in the published piece.

We intend to make the following points in the article:

1. Ksantex SARL is registered in Luxembourg. It is a defence-related business selling defence equipment and advice. You were a director of this company between February 2015 and July 2017. You did not declare this directorship on the Register of Members Interests and thereby hid your connection to the company.
2. Your business associate and parliamentary assistant Reza Tabrizi was also a director of the same company during the same period. Your brother Andrew was a minority shareholder and director of Ksantex SARL's UK subsidiary between 2013 and 2016.
3. During the period that you were a director you were also a member of the House of Commons Defence Select Committee, which is tasked with overseeing the work of government on defence issues. You also spoke in debates in support of greater defence spending and in support of the regime in Kazakhstan (where Ksantex did business).
4. A former member of Parliament's privileges and standards committee says in relation to your failure to declare the directorship: "This looks like a clear and serious breach of parliamentary rules. As an MP, [Stewart] should have declared this position even if unpaid. As an MP on the Defence Committee the omission is even worse. Most people will find it astonishing that a MP sitting on a committee which in part scrutinises UK government defence procurement is at the same time a director of a company which sells defence equipment and advice."
5. Ksantex SARL appears to be connected to Azerbaijani businessman Khagani Bashirov. His wife was previously registered as the Person of Significant Control (PSC) of the UK subsidiary. You were previously linked to Mr Bashirov through a £3,000-a month retainer at VES Consultancy (UK) Ltd for the "provision of leadership/planning training and advice" to this company which he controlled. You last listed this as an interest in February 2012.
6. Mr Bashirov served a five-month prison sentence in Azerbaijan between 12 September 2010 and 17 January 2011 in relation to the disappearance of tens of millions in local currency from the International Bank of Azerbaijan.

Why did you not register your interest in Ksantex SARL as the rules require?

What was the nature of your role with the company?

Were you paid for your directorship and, if so, how much?

Were you aware of the connection between Ksantex SARL and Khagani Bashirov and his former conviction in Azerbaijan?

Were you aware of Mr Bashirov's connection to VES Consultancy (UK) Ltd during your time as a paid consultant to the firm?

Did you at any stage have direct dealings with Mr Bashirov?

Would you like to add anything else to provide context or explanation in relation to any of this?

We are preparing to publish an article and would like to reflect your answers in our published piece and would therefore require your response by 5pm Wednesday 14th June.

Yours sincerely,


openDemocracy

[REDACTED]

RoR response received tuesday afternoon

Dear [REDACTED]

Thank you for your e mail. In response here are my answers to your questions.

Why did you not register your interest in Ksantex SARL as the rules require?

I believe I had already registered my interest in that group of companies in 2012. At the time I believe the business of the group was about construction and in no way defence related.

What was your nature of your role in the Company?

I was actually a consultant/non-executive director. It was a start-up company and I advised on business leadership/planning based on my 2009 book 'Leadership under Pressure' which was all about business. But I was not in any way involved in running the company or any decisions it made. I was totally unsighted on decision-making.

At no point did I refer to or lobby for these companies in the House of Commons.

Were you paid for your directorship and if so, how much?

I was paid £3000 a month as you indicated. Thereafter I had no further involvement although my brother started working for the Company.

Were you aware of the connection between Ksantex SARL and Khagani Bashirov and his former conviction in Azerbaijan?

No, I was not. If I had known that I would not have accepted the consultancy.

Were you aware of Mr Bashirov's connection to VES Consultancy (UK) during your time as a paid consultant for the firm?

No, I was not. As I have stated I was purely involved for leadership training.

Did you at any stage have direct dealings with Mr Bashirov?

I believe I met him socially twice during my consultancy and we certainly did not discuss business.

Bob Stewart

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Thank you for your response.

Can I clarify the answer to the question below:

Were you paid for your directorship and if so, how much?

I was paid £3000 a month as you indicated. Thereafter I had no further involvement although my brother started working for the Company.

The question related to the directorship with Ksantex SARL. Are you saying your remuneration from the "group of companies" ended in 2010/11 when your arrangement with VES Consultancy ended, or was there any ongoing payment in relation to your later work for Ksantex SARL?

Many thanks,



I'm not sure to be honest. I think my remuneration lasted for two years but then they had no further need of me.

Bob

From: [REDACTED]
Date: Wed, 5 Jul 2023 at 12:06
Subject: Bob Stewart
To: standardscommissioner@parliament.uk

Hi Sara,

Hope you're well! I believe you spoke to my colleague [REDACTED] yesterday about collecting evidence for your investigation into Bob Stewart, I'm just getting in touch to send some bits over.

Here is a copy of the right of reply we sent to Bob Stewart, with his response pasted below: https://docs.google.com/document/d/1_Cj5mxHX3hApvwEIMBm8u_Nd8Yi_pybbSHVSlkpkzWs/edit

Here is a copy of the response we received from Khagani Bashirov when we asked him for comment. (He responded in French but it is translated below): https://docs.google.com/document/d/1_80q5le_6C_KbJGdhE9eisyEWetHX9xQwjYkFujqh9c/edit

More recently, Bashirov has given a filmed interview about the story with an Azerbaijani journalist. In the clip (the relevant bit is roughly between 49:00 and 54:00) Bashirov is frank about Stewart's payment. He appears to confirm that Ksantex paid Stewart a £3000 salary, which he says Stewart declared to the tax authorities in the UK but "should have declared" to the parliamentary authorities. The video is in Russian, but it's available to watch here: <https://www.youtube.com/watch?v=UF-Y7Q28Czc&t=2976s>

Here is an archived version of the Ksantex website: <http://web.archive.org/web/20160110160524/http://ksantex.com/>

I'm also attaching documents from Luxembourg that show Stewart's appointment to Ksantex in 2015 and his resignation in 2017, as well as documents showing his parliamentary staffer Reza Tabrizi, worked at the firm and a 'social objet' document that shows the purpose of the company. These are publicly accessible via the Luxembourg business register: <https://www.lbr.lu/>

I've also attached the 2010 accounts of the other company Stewart worked for (which he declared), VES Consultancy (UK) Ltd. They show the company was dormant and it's unclear how Stewart was paid £3,000 a month by a dormant company.

And finally, I have attached a witness statement from the National Crime Agency, which contains details about Bashirov's jail time and connections to the former chairman of the International Bank of Azerbaijan in the context of the UK's first Unexplained Wealth Order.

I hope all of this is helpful, please do let me know if I can help in any other way.

Best wishes,

[REDACTED]

Cher Monsieur

Je voulais vous remercier tout d'abord parce que vous êtes le premier journaliste (enfin) qui c'est adressé à moi avant de publier un article . C'est très important pour moi parce que c'est ma réputation , qui est en cause et la réputation de ma famille . Depuis 2010 on a commencé à écrire des articles sur moi et mes relations lié à International Bank of Azerbaijan et son Chairman [REDACTED]

En septembre 2010 j'étais mis en examen en Azerbaïdjan au cours d'une investigation de détournement d'argent de l'International Bank of Azerbaijan. Ma seule participation était liée à mon activité en temps qu'un groupe des sociétés fiduciaires exerçant des services suivantes : créations des sociétés, services comptabilité, services juridiques par les biais des avocats , services nommée shareholders and nominees director , domiciliation , ouverture des comptes bancaires etc... Bref des services fiduciaires classiques. A l'époque tout cela était légal .

En 2010 et 2011 quelques journalistes azébaïdjanais ont publié des articles dans lesquels ils parlent de détournement des fonds de ma part etc . Depuis j'ai passé 13 ans et chaque année des journalistes des différents pays y compris européens écrivent des articles en ajoutant toujours l'info recopier des premières articles azébaïdjanais . C'est à dire ni avant de 2010 ni après rien ne se passe sauf cette affaire de banque IBA . Je pose la question à tous les journalistes comment ça se fait , que j'ai commis autant de crimes financiers et autres et je suis en liberté . Ils écrivaient des choses fantastiques sur moi et n'ont jamais demandé mon avis et jamais présenter aucun document qui prouve ma culpabilité .

Pour votre information j'ai eu une investigation en Azerbaïdjan qui est commencée en septembre 2010 et c'est terminée en novembre 2013 (non coupable) , même pas juger . Si quelqu'un peut prouver le contraire j'aimerais bien le voir .

Une deuxième investigation a commencée en mars 2019 au Luxembourg qui n'a rien avoir (comme pays) avec cette affaire et personne n'a jamais expliqué correctement à qui appartient l'initiative de cette investigation concernant la banque IBA , moi et [REDACTED] . Par contre sans aucun jugement on a fermé tous les comptes bancaires de mes sociétés, mes comptes à moi , les comptes de ma famille , de mes amis et de mes clients. C'est bien cela la présomption d'innocence et le droit de l'homme. J'étais obligé de déménager de facto en Turquie, mais je reste toujours résident fiscal luxembourgeois. On vient d'annoncer la faillite de ma société Suisse Tiara Swiss . Partout les banquiers m'embête par les questions sur les articles publiés .

En ce qui concerne [REDACTED] et sa famille . Oui je le connaissais depuis 1994 . Il n'était pas banquier encore . On avait des relations amicales . J'ai décrit nos relations en détails au NCA . J'ai bien coopéré avec eux (NCA) en expliquant tous les événements et ma participation . J'ai rien à cacher de personne. D'après les articles je dois logiquement être une personne très riche . Qu'on me prouve cela. Il me reste un seul appartement à Paris financé par une banque luxembourgeoise et qui m'a attaqué aujourd'hui parce que je ne peux pas rembourser le prêt et les juges français vont mettre notre appartement à la vente aux enchères en septembre au plus tard . Aujourd'hui c'est très facile de trouver les richesses cachées. Pourquoi on trouve rien sur moi. J'ai toujours déclaré mes revenus assez importants en France , Luxembourg et Suisse . Et j'ai payé beaucoup d'impôt surtout en France . J'ai eu un contrôle fiscal de 2018 jusqu'à 2022 pour la période 2006-2016 . Et j'ai sorti propre de ce contrôle . J'ai tous les documents qui prouvent ça .

Excusez moi de prendre trop votre temps , mais vous êtes le premier journaliste en 13 ans qui m'a honnêtement proposé de répondre aux questions avant de publier l'article . Bloomberg n'a pas fait ça tandis que ensemble avec les journalistes on pouvait clarifier plusieurs choses .. Je vous remercie beaucoup pour cela . Je veux annoncer à toutes les administrations de différents pays . Je suis toujours ouvert à toute sorte d'investigations. Mais un jour il faut terminer avec cela . J'ai 62 ans et c'est tragique de perdre la réputation surtout à cet âge . J'ai pas purgé un an de prison en Azerbaïdjan. J'étais arrêté et mis en détention pour 4 mois (11 septembre 2010 jusqu'à 07 janvier 2011) . J'ai quitté l'Azerbaïdjan le 13 septembre 2011 pour Paris . Mes casiers judiciaires sont propres partout . C'est prouvable .

A présent certain journaliste essaye d'utiliser moi et mon nom pour salir des personnes très honnêtes et correctes. Ce n'est pas votre cas . Je ne parle pas de vous .

Par exemple les journalistes de euroreporter voulait attaquer le sujet de free porte à Luxembourg parce que l'Union Européen critiquer beaucoup le concept de Free Porte comme un instrument de blanchissement. Pour attaquer le directeur générale de Free Porte Luxembourg [REDACTED] ils ont trouver l'information sur son amitié avec moi et notre business partenariat de l'époque . Lui il est toujours directeur générale de Free Porte très respecté par l'administration et moi de nouveau victime de la presse et des nouveaux problèmes avec les banquiers . Pareil avec un article de Bloomberg où les journalistes attaque les anciens avocats américains (Denton) de İBA et de [REDACTED] et de nouveau ils écrivent mon histoire d'investigation en Azerbaïdjan et l'affaire de détournement .

Mille excuses de trop prendre votre temps . Je fait cela pour pouvoir par votre article annoncer à tous le monde mon innocence dans cette affaire et si c'est le contraire qu'on présente d'abord les documents justifiant des soupçons et des accusations infondées et après on écrit sur moi des articles.

Dear Sir

I wanted to thank you first of all because you are the first journalist (at last) who has spoken to me before publishing an article. This is very important to me because it's my reputation that's at stake, as well as the reputation of my family. In 2010, articles began to be written about me and my relations with the International Bank of Azerbaijan and its Chairman, [REDACTED]

In September 2010 I was indicted in Azerbaijan during an investigation into the embezzlement of money from the International Bank of Azerbaijan. My only involvement was related to my activity as a group of trust companies providing the following services: setting up companies, accounting services, legal services through lawyers, nominee shareholders and nominees director services, direct debit, opening bank accounts, etc. In short, classic trust services. At the time all this was legal.

In 2010 and 2011 some Azerbaijani journalists published articles in which they talk about embezzlement of funds from me etc.. Since then it has been 13 years and every year journalists from different countries, including Europe, have written articles always adding information copied from the first Azerbaijani articles. That is to say, neither before 2010 nor afterwards has anything happened except this İBA bank affair. I ask all the journalists how come I committed so many financial and other crimes and I'm still free. They wrote fantastic things about me and never asked my opinion and never presented any document that proves my guilt.

For your information I had an investigation in Azerbaijan that began in September 2010 and ended in November 2013 (not guilty), not even tried. If anyone can prove the contrary, I'd love to see it.

A second investigation began in March 2019 in Luxembourg which has nothing to do (as a country) with this case and no one has ever properly explained who owns the initiative of this investigation concerning Bank İBA , me and [REDACTED] . On the other hand without any judgment they closed all the bank accounts of my companies , my own accounts , the accounts of my family , my friends and my clients . That's the presumption of innocence and human rights. I had to move de facto to Turkey, but I am still a Luxembourg tax resident. My Swiss company Tiara Swiss has just been declared bankrupt. Bankers everywhere are bothering me with questions about published articles.

Regarding [REDACTED] and his family. Yes I knew him since 1994. He was not yet a banker. We had a friendly relationship. I described our relationship in detail to the NCA. I cooperated well with them (NCA) by explaining all the events and my involvement. I have nothing to hide from anyone. According to the articles I must logically be a very rich person. Someone prove that to me. I still have just one flat in Paris, financed by a Luxembourg bank, which has now attacked me because I can't pay back the loan, and the French judges are

going to put our flat up for auction in September at the latest. These days it's very easy to find hidden wealth. Why can't they find anything on me? I've always declared my income in France, Luxembourg and Switzerland. And I've paid a lot of tax, especially in France. I had a tax audit from 2018 to 2022 for the period 2006-2016. And I came out clean from this audit. I have all the documents to prove it.

Excuse me for taking up too much of your time, but you are the first journalist in 13 years who has honestly offered to answer questions before publishing the article. Bloomberg didn't do that, whereas together with the journalists we were able to clarify a number of things. Thank you very much for that. I want to announce to all the administrations of different countries. I am always open to any kind of investigation. But one day we have to put an end to this. I'm 62 years old and it's tragic to lose one's reputation, especially at this age. I didn't serve a year in prison in Azerbaijan. I was arrested and detained for 4 months (11 September 2010 to 07 January 2011). I left Azerbaijan on 13 September 2011 for Paris. My criminal record is clean everywhere. It is provable.

Now some journalists are trying to use me and my name to smear very honest and decent people. This is not your case. I'm not talking about you.

For example the journalists of euroreporter wanted to attack the subject of Free Porte in Luxembourg because the European Union criticizes a lot the concept of Free Porte as an instrument of money laundering. To attack the general manager of Free Porte Luxembourg [REDACTED] they found information on his friendship with me and our business partnership at the time. He is still the Managing Director of Free Porte, highly respected by the administration, and I am once again the victim of the press and of new problems with the bankers. It was the same with a Bloomberg article in which the journalists attacked the former American lawyers (Denton) of İBA and [REDACTED] and once again they wrote about my investigation in Azerbaijan and the embezzlement affair.

A thousand apologies for taking too much of your time. I am doing this so that I can use your article to tell everyone that I am innocent in this case. If it is the other way round, first present the documents justifying the suspicions and unfounded accusations and then write articles about me.

A propos de vos questions

Oui j'étais bénéficiaire économique et peut être administrateur des sociétés VES Consultancy UK Ltd et aussi de la société Ksantex Sarl ou j'ai mis comme nommée (c'est à dire formellement) ma femme [REDACTED]. C'est moi qui contrôler les deux sociétés, qui vous intéresse .

Je ne me souviens pas des détails de l'organigramme, mais tous les sociétés (Chypriote ou autres), qui avez détenu des parts dans la société Ksantex m'appartenait .

A propos de la question de mon emprisonnement en Azerbaïdjan sur l'affaire de détournement j'ai déjà répondu . Et je le répète . J'étais mis en détention provisoire à cause d'une investigation menée par les impôts Azerbaïdjanais et mon casier judiciaire (criminal records) est clean . Mon criminal records est clean dans tous les pays où j'ai habité ou travaillé. Très facile de le prouver .

Ce qui démontre aussi qu'on peut pas me mettre dans une groupe criminel avec [REDACTED] démontre le nouveau contrat de gérance des sociétés lié au crédit İBA signé en janvier 2016 ([REDACTED] a quitté son poste mars 2015 et mis en prison pour 16 ans le 5 décembre 2015) avec le nouveau Chairman de banque İBA et mon fiduciaire luxembourgeois Fortrust Global . Et c'est moi avec mon équipe avez retourné tous les actifs à l'Etat Azerbaïdjanais , qu'on gère purement en qualité de fiduciaire . On a jamais ni choisi ni géré les projets eux même . C'était la prerogative des banquiers . Ils nous laissait pas faire .

Oui la NCA me designe comme étant lié à l'ancien Chairman de banque İBA

Oui j'étais lié à [REDACTED] et sa famille par les relations d'affaires et amicales à l'époque. Nos relations ont commencé à se détériorer début 2013 et totalement terminées en novembre 2015. Il m'a dit que je l'ai trahi parce que j'ai donné tous les actifs gérés par mon fiduciaire à l'état Azerbaïdjanais.

J'ai eu raison de le faire pour simple raison que l'achat des actifs était financé par IBA et c'était normal de le retourner à IBA.

Mon fiduciaire a aussi rendu des services fiduciaires à [REDACTED] et sa famille pour l'achat et le financement des différents biens. NCA à tous les détails.

A propos de M. Bob Stewart. D'après ma mémoire je l'ai rencontré une ou deux fois. Je ne me souviens pas qu'il était consultant auprès de la société VES Consultancy UK Ltd, mais ça change rien. Je voulais commencer de rendre des services de conseil économique à mes clients et la présence d'un consultant pareil pourrait fortement m'aider.

Je trouve ça normal.

Monsieur Bob Stewart n'était pas un directeur, qui avait le droit de gérer quoi que ce soit. Il était juste dans le board of directors. Comme je l'avais dit tous les deux sociétés appartenaient à moi. Il faut noter aussi, que VES Consultancy UK Ltd n'a pas eu d'activité. Elle a resté toujours inactive. Les documents bancaires et comptables peuvent le prouver facilement.

A propos des fonctions de M. Bob Stewart. Ses fonctions étaient très réduites aux consultations pour une société nouvelle (VES) qui voulait démarrer avec des conseils aux clients mais à la manière très moderne. On peut dire en anglais peut-être start up. Mais on n'a pas pu continuer pour des raisons purement économiques. On n'a même pas commencé on peut dire.

A propos de rémunération. D'après ma mémoire oui il était rémunéré 3000 GBP par mois pendant un an je pense.

Il n'y a eu aucune autres rémunérations directes ou indirectes.

Il faut noter aussi qu'il n'a jamais eu aucune relations liées à mon activité fiduciaire et surtout liées à IBA et aucun lobby politique ou autres. Je suis sûr qu'il connaît même pas l'existence de cette banque et même à propos de moi je pense il se souviendra avec des difficultés.

Je vous comprends, que après tous les articles dans les médias sociaux mon nom peut faire imaginer plein de choses. Mais l'imagination et les faits sont des choses différentes.

Vous savez Cher Monsieur, que j'ai gardé presque tous les documents financiers liés à l'activité des sociétés liées à IBA. Et c'est très facile à démontrer mon honnêteté et surtout mon innocence, mais personne ne s'intéresse. C'est beaucoup plus facile de recopier et publier les calomnies sales des journalistes azérbaidjanais de l'époque. Aujourd'hui ils sont beaucoup plus honnêtes. Juste pour votre information la plupart des articles sur moi, étaient préparés et payés (2010-2015) par certains [REDACTED], qui a eu 13 ans de prison dans l'affaire IBA et qui était un proche de [REDACTED].

J'aimerais bien vous rencontrer un jour pour évoquer des sujets très intéressants, qui vous feraient mieux comprendre des choses me concernant ou autres.

Je vous remercie beaucoup pour avoir s'adresser à moi avant de publier et citer mon nom dans votre article, ce qui montre votre honnêteté et votre professionnalisme.

Cordialement

Khagani Bashirov

Merci d'adresser le lien sur votre article après la publication, que je puisse lire aussi

About your questions

Yes, I was an economic beneficiary and perhaps a director of VES Consultancy UK Ltd and also of Ksantex Sarl, where I nominated (i.e. formally) my wife [REDACTED] I'm the one who controls the two companies you're interested in.

I don't remember the details of the organisation chart, but all the companies (Cypriot or otherwise) that held shares in Ksantex belonged to me.

I have already answered the question about my imprisonment in Azerbaijan for embezzlement. And I repeat. I was remanded in custody because of an investigation by the Azerbaijani tax authorities and my criminal records are clean. My criminal records are clean in all the countries where I have lived or worked. It's very easy to prove.

What also proves that I cannot be put in a criminal group with [REDACTED] the new management contract for İBA credit-linked companies signed in January 2016 ([REDACTED] left his post in March 2015 and was put in prison for 16 years on 5 December 2015) with the new Chairman of İBA bank and my Luxembourg trustee Fortrust Global. And it is I with my team have returned all the assets to the Azerbaijani State, which we manage purely in a fiduciary capacity. We never chose or managed the projects themselves. That was the prerogative of the bankers. They wouldn't let us.

Yes, the NCA designated me as being linked to the former Chairman of the bank İBA

Yes I was linked to [REDACTED] and his family through business and friendship at the time. Our relationship started to deteriorate in early 2013 and totally ended November 2015. He told me that I had betrayed him because I had given all the assets managed by my trustee to the Azerbaijani state.

I was right to do so for the simple reason that the purchase of the assets was financed by İBA and it was normal to return them to İBA.

My trustee also rendered fiduciary services to [REDACTED] and his family for the purchase and financing of the various assets. NCA in all details.

About Mr. Bob Stewart. To the best of my memory I met him once or twice. I don't remember him being a consultant with VES Consultancy UK Ltd, but that doesn't matter. I wanted to start providing economic consultancy services to my clients and the presence of such a consultant could be a great help to me.

I think this is normal. Mr Bob Stewart was not a director, who had the right to manage anything. He was just on the board of directors. As I said, both companies belonged to me. 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.

About the functions of Mr. Bob Stewart. His duties were very limited to consulting for a new company (VES) that wanted to start with advice to customers but in a very modern way. You could say "start up". But we couldn't continue for purely economic reasons. You could say we didn't even start.

Talking about remuneration. According to my memory, he was paid 3000 GBP per month for one year I think.

There was no other direct or indirect remuneration.

It should also be noted that he never had any relationship whatsoever with my trust business and especially with İBA and no political or other lobby. I am sure he does not even know the existence of this bank and even about me I think he will remember with difficulty.

I understand you, that after all the articles in social media my name can make imagine a lot of things. But imagination and facts are different things.

You know Dear Sir, that I have kept almost all financial documents related to the activity of companies related to İBA . And it's very easy to demonstrate my honesty and especially my innocence, but nobody is interested. It's much easier to copy and publish the dirty slanders of the Azerbaijani journalists of the time. Today they are much more honest. Just for your information most of the articles about me , were prepared and paid for (2010-2015) by some [REDACTED] who got 13 years in prison in the İBA case and who was close to [REDACTED]

I would love to meet you one day to talk about some very interesting subjects, which would help you to understand things about me and others better.

Thank you very much for contacting me before publishing and quoting my name in your article, which shows your honesty and professionalism.

Sincerely

Khagani Bashirov

Please send the link to your article after publication, so that I can read it too.

Follow-up questions:

Cher Monsieur Bashirov,

Merci d'avoir pris le temps de répondre, c'est très apprécié et utile.

Puis-je apporter une précision concernant le rôle de Bob Stewart ? Les documents déposés au Luxembourg montrent qu'il a été directeur de Ksantex SARL, un fournisseur d'équipements de défense et de conseils, entre février 2015 et juillet 2017.

Cela s'est passé quelque temps après ses précédentes fonctions au sein de VES Consultancy UK Ltd.

Son collègue Reza Tabrizi était également un administrateur inscrit sur la liste au cours de la même période. Quant à son frère Andrew Stewart, il était directeur et actionnaire minoritaire de la filiale britannique de Ksantex SARL.

Pouvez-vous vous rappeler quel était le rôle de Bob Stewart chez Ksantex ? A-t-il été rémunéré pour ce rôle ? Quels étaient les rôles de Reza Tabrizi et d'Andrew Stewart ?

Answer:

[10:04, 15/06/2023] Bashirov: Merci pour vos questions

[10:06, 15/06/2023] Bashirov: Monsieur Bob Stewart n'a jamais été exécutive director on peut prouver ça par les documents de registre de commerce Luxembourgeois
Je vais essayer toute suite contacter Luxembourg pour quand même poser votre question

[10:08, 15/06/2023] Bashirov: Son frere était salarié dans la société je pense Ksantex Anglaise (je ne me souviens plus) . Il avait un contrat de travail et était rémunéré. Je vais me renseigner toute suite .

[10:08, 15/06/2023] Bashirov: Monsieur Bob Stewart n'a jamais participer à aucun contrat commercial ou autres .

[10:12, 15/06/2023] Bashirov: Son frère s'occuper de la société Thales

[10:12, 15/06/2023] Bashirov: Il devait m'accompagner dans mes projets avec la société Thales

J'étais consultant de la société Thales par le biais de ma société Chypriote de 2002 jusqu'à 2017

Ksantex n'a jamais vendu ou acheter des équipements militaires. C'est une société de conseil dans le domaine des radars civile et militaire tous d'abord

Reza Tabrizi c'est un ami à moi , que j'ai connu la première fois en Azerbaïdjan en 1994 .

Je viens de me renseigner dans la société Ksantex il y avait trois directeur M. Seymour Ahmadov , M. Reza Tabrizi , M. Bob Stewart

Fonction d'exécutif directeur de facto était à M. Seymour Ahmadov

M. Tabrizi et M. Stewart n'ont jamais jouer un rôle commercial , lobbying ou publicitaire.

A l'époque dans plusieurs sociétés luxembourgeoise on mettait souvent les noms des personnalités dans les board of director . Leur travail se limiter seulement en qualité de consultant.

Mr Bob Stewart has never been an executive director. This can be proven by the documents of the Luxembourg trade register.

I will try to contact Luxembourg immediately to ask your question.

His brother was an employee of the English company Ksantex (I don't remember). He had an employment contract and was paid. I'm going to find out right away.

Bob Stewart has never been involved in any commercial or other contracts.

[10:12, 15/06/2023] Bashirov: His brother was in charge of the Thales company.

[10:12, 15/06/2023] Bashirov: He was to accompany me in my projects with the Thales company.

I was a consultant to Thales through my Cypriot company from 2002 until 2017.

Ksantex has never sold or bought military equipment. It is a consulting company in the field of civil and military radars.

Reza Tabrizi is a friend of mine, whom I first met in Azerbaijan in 1994.

I have just found out that Ksantex had three directors: Mr Seymour Ahmadov, Mr Reza Tabrizi and Mr Bob Stewart.

Mr Seymour Ahmadov was the de facto executive director.

Mr Tabrizi and Mr Stewart never played any commercial, lobbying or publicity role.

At the time, in several Luxembourg companies, the names of these personalities were often put on the board of directors. Their work was limited to a consultancy role.

Registered Number 05953154

V.E.S CONSULTANCY (UK) LTD

Dormant Accounts

31 October 2010

V.E.S CONSULTANCY (UK) LTD

Registered Number 05953154

Balance Sheet as at 31 October 2010

	2010	2009
	£	£
Current assets		
Cash at bank and in hand	1000	1000
Net assets	1000	1000
Issued share capital		
1000 Ordinary Shares of £1 each	1000	1000
Total Shareholder funds	1000	1000

STATEMENTS

- For the year ending 31 October 2010 the company was entitled to exemption under section 480 of the Companies Act 2006 relating to dormant companies.
- The members have not required the company to obtain an audit in accordance with section 476 of the Companies Act 2006.
- The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of accounts.
- These accounts have been prepared in accordance with the provisions applicable to companies subject to the small companies regime.

Approved by the Board on 29 July 2011

And signed on their behalf by:

Khagani Bashirov, Director

This document was delivered using electronic communications and authenticated in accordance with the registrar's rules relating to electronic form, authentication and manner of delivery under section 1072 of the Companies Act 2006.

Submission references

Trade and Companies Register

Luxembourg

RCS

B152619 – L150045618 – submitted 11/03/2015.

Statutory change

Principal establishment

KSANTEX S.à.r.l.
B152619

Limited liability company

31, rue de Strasbourg
L – 2561 Luxembourg

Data to be modified

- | | |
|---|--|
| ☐ Company <u>name</u> | ☐ Fiscal year |
| ☐ Trading name(s) | ☐ Associates |
| ☐ Legal form | ☒ Administrator(s)/Manager(s) |
| ☐ Head office | ☐ Day-to-day managers |
| ☒ Company purpose | ☐ Person(s) responsible for financial audit |
| ☐ Share capital/Capital | ☐ Merger/Demerger |
| ☐ Duration | ☐ Voluntary liquidation |

In application of article 21 paragraph 2 of the amended Law of 19 December 2002 on trade and companies registration and business accounting and annual accounts and article 21 of the amended grand-ducal regulation of 23 January 2003 implementing the Law of 19 December 2002, this form contains as a minimum the up-to-date information communicated to the trade and companies register up to three days before the date of issuance of said form. If the trade and companies register has been notified of a modification since then, it is possible that it has not been taken into account when issuing this form.

Company purpose

Company purpose (indication)

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. The company's purpose shall also be any provision of services ~~in the area of~~ communication by means of objects and images and via all media outlets.

It may carry out all operations relating directly or indirectly to the acquisition of holdings in any form whatsoever, in any company taking the form of a capital company or partnership, as well as the administration, management, control and development of those holdings.

It may in particular use its funds for the creation, management, enhancement and liquidation of a portfolio composed of all securities, participate in creation, development and control, acquire by way of contribution, subscription, underwriting or call option and in any other manner all securities, realise them by means of sale, transfer, exchange, grant any assistance, loans, advances or guarantees to any company in which it has a direct or indirect interest. It may acquire, develop, receive and license patents, brands and other industrial property rights. (*)

☒ Company purpose incomplete

Administrator(s)/Manager(s)

Statutory rules for signature (indication)

The Company is considered to have entered into an undertaking in respect of a third party either by the individual signature of the technical manager, or by the joint signature of a technical manager and an administrative manager.

The Company is also considered to have entered into an undertaking in respect of a third party by the signature of any person to whom the Board has delegated special powers.

		Modify	Remove
1 ██████████	page 4	☒	☐
2 New administrator/manager: STEWART Robert Alexander	page 5		
3: New administrator/manager: REZAI-TABRIZI Mohamed Reza	page 6		

1

Modify ☒ Remove ☐**Natural person**

Name

First name(s)

Date of birth

Place of birth

Country of birth

Private or professional address

Number

Street

Building

Floor

Postcode

Town

Country

Mandate type

Company body

Role

Management board

technical manager

Signing authority (indication)

Duration of mandate

Date of appointment

Duration of mandate

26/02/2015

Indefinite

Mandate expires on

at the general meeting to take place in the year

DD/MM/YYYY

or

YYYY

2 STEWART Robert Alexander

Natural person

Name		First name(s)
STEWART		Robert Alexander
Date of birth	Place of birth	Country of birth
		United Kingdom

Private or professional address

Number	Street	
Building	Floor	
House of Commons		
Postcode	Town	Country
SW1A 0AA	London	United Kingdom

Mandate type

Company body	Role
Management board	administrative manager
Signing authority (indicated)	

Duration of mandate

Date of appointment	Duration of mandate
26/02/2015	Indefinite
Mandate expires on	at the general meeting to take place in the year
DD/MM/YYYY	or YYYY

3 REZAI-TABRIZI Mohamed Reza

Natural person

Name

REZAI-TABRIZI

First name(s)

Mohamed Reza

Date of birth

[REDACTED]

Place of birth

[REDACTED]

Country of birth

[REDACTED]

Private or professional address

Number

[REDACTED]

Street

[REDACTED]

Building

[REDACTED]

Floor

[REDACTED]

Postcode

[REDACTED]

Town

[REDACTED]

Country

[REDACTED]

Mandate type

Company body

Management board

Role

administrative manager

Signing authority (indication)

[REDACTED]

Duration of mandate

Date of appointment

26/02/2015

Duration of mandate

Indefinite

Mandate expires on

DD/MM/YYYY

or

at the general meeting to take place in the year

YYYY

Trade and Companies Register
B152619 – L150045618
submitted 11/03/2015

KSANTEX S.à.r.l.
Limited liability company
Head office: [REDACTED]

RCS Luxembourg: B 152.619
Registered capital: €12,500

RESOLUTIONS OF THE SOLE SHAREHOLDER
OF 26 FEBRUARY 2015
NO. 429/2015

In the year two thousand and fifteen, on the twenty-sixth of February,
Before Us, [REDACTED] notary residing in Luxembourg,
Grand Duchy of Luxembourg.

Appeared:

IMMO PROPERTY S.A., public limited liability company constituted
under Luxembourgish law, established and with its registered office at [REDACTED]
[REDACTED] registered with the Luxembourg Trade and
Companies Register under number B 180.701,
here represented by [REDACTED] private employee,
professionally resident in [REDACTED] by virtue of
a power of attorney privately established on 25 February 2015.

The power of attorney signed "*ne varietur*" by the party appearing and
the undersigned notary shall remain annexed to the present document and shall
be formally registered with it.

That party appearing is the sole shareholder (the "Sole Shareholder")
of the company KSANTEX S.à.r.l (the "Company"), a limited liability company
with head office located at [REDACTED]
incorporated as recorded in a deed established by the notary [REDACTED]
notary resident in Luxembourg, on 20 April 2010, published in [REDACTED]

~~Mémorial C~~, Compendium of Companies and Associations of 1 June 2010 under number 1140. The company statutes were modified most recently as recorded in a deed established by [REDACTED] notary resident in Luxembourg, on 7 May 2014, published in ~~Mémorial C~~, Compendium of Companies and Associations of 22 July 2014 under number 1908.

The Sole Shareholder, representing the entirety of the share capital, takes the following resolutions.

FIRST RESOLUTION

The Sole Shareholder decides to modify the Company's purpose and, consequently, to modify article 4 of the statutes as follows:

"Art. 4. 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.

The company's purpose shall also be any provision of services ~~in the area of~~ communication by means of objects and images and via all media outlets.

It may carry out all operations relating directly or indirectly to the acquisition of holdings in any form whatsoever, in any company taking the form of a capital company or partnership, as well as the administration, management, control and development of those holdings.

It may in particular use its funds for the creation, management, enhancement and liquidation of a portfolio composed of all securities, participate in creation, development and control, acquire by way of contribution, subscription, underwriting or call option and in any other manner all securities, realise them by means of sale, transfer, exchange, grant any assistance, loans, advances or guarantees to any company in which it has a direct or indirect interest. It may acquire, develop, ~~receive~~ and license patents, brands and other industrial property rights.

The company may manage its own property assets through purchase, rental, development and the sale of any property and property rights.

In general, the company may carry out all other commercial, industrial, financial, security and property transactions directly or indirectly connected with its purpose or likely to assist its operation and development.”

WARNING

The notary advised the party appearing of the fact that before any commercial activity of the Company whose purpose is hereby modified, they must be in possession of a trading permit in due form relating to the company's purpose, which the party appearing expressly acknowledged.

SECOND RESOLUTION

The Sole Shareholder decides to modify article 11 of the company's statutes in order to introduce the concepts of technical manager and administrative manager and in consequence to modify the signing authority, in such a way that henceforward article 11 will have the following content:

“Art.11 The Company is managed by one or more managers named by a resolution of the shareholders, which sets the duration of their mandate. The managers are not necessarily shareholders.

The managers may be dismissed at any time, with or without reason, by a decision of the shareholders.

If several managers are named, they shall form the management board (the **Board**). The shareholders may decide to name technical managers and administrative managers of two different classes, that is, one or more technical managers and one or more administrative managers.

The Company is considered to have entered into an undertaking in respect of a third party either by the individual signature of the technical manager, or by the joint signature of a technical manager and an administrative manager.

The Company is also considered to have entered into an undertaking in respect of a third party by the signature of any person to whom the Board has delegated special powers.”

THIRD RESOLUTION

The Sole Shareholder decides to redefine the current sole manager Mr [REDACTED] as technical manager.

FOURTH RESOLUTION

The Sole Shareholder decides to name the following persons as administrative managers for an indefinite period:

- Mr Robert Alexander STEWART, [REDACTED]
United Kingdom, residing professionally at House of Commons,
London, SW1A 0AA; and
- Mr Mohamed Reza REZAI-TABRIZI, [REDACTED]
residing at [REDACTED]

Costs

The parties have evaluated the total costs and expenses, remuneration and charges, in whatever form, that are the responsibility of the Company or are charged to it by reason of its constitution at around one thousand three hundred euros (€ 1,300).

Witnessed, in Luxembourg, on date indicated above.

Further to reading hereof and interpretation hereof being provided to the party appearing, known to the notary by name, usual first name, status and residence, the party appearing signed the present document with the notary.

Signed: [REDACTED]

Recorded at Luxembourg Registry Office 2, 5 March 2015.

2LAC/2015/4840

Received seventy-five euros (€75)

Recipient/signed/Paul Molling

FOR CERTIFIED COPY

delivered at the request of the abovementioned company,
on separate sheets, for publication in the Mémorial C, Compendium
of Companies and Associations.

Luxembourg, 11 March 2015

Trade and Companies Register
B152619 – L150045618
submitted 11/03/2015



NOTARY



**Luxembourg Trade and Companies
Register**

L-2961 Luxembourg

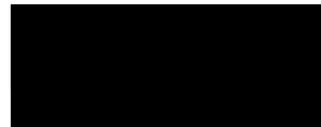
Re:	KSANTEX SARL
-----	--------------

Dear Sir or Madam,

In relation to the company under this heading, we are not in possession of the street name or house number for MR STEWART's address.

Our ordering party code is: 5770. Thank you in advance.

Yours faithfully,



Submission references

Trade and Companies Register
Luxembourg RCS

B152619 – L150050074 – submitted 19/03/2015

Correction or addition – [Non-statutory](#) modification

Principal establishment

KSANTEX S.à.r.l.
B152619*Limited liability company*31, rue de Strasbourg
L – 2561 LuxembourgData to be [modified](#)

- ☐ Company name
☐ Trading name(s)
☐ Head office
☐ Share capital/Capital
☐ Fiscal year
☐ Associates

- ☒ [Administrator\(s\)/Manager\(s\)](#) page 2
☐ Day-to-day managers
☐ Person(s) responsible for financial audit
☐ Merger/Demerger
☐ Voluntary liquidation

In application of article 21 paragraph 2 of the modified Law of 19 December 2002 on trade and [companies](#) registration and business accounting and annual accounts and article 21 of the modified grand-ducal regulation of 23 January 2003 implementing the Law of 19 December 2002, this form contains as a minimum the up-to-date information communicated to the trade and companies register up to three days before the date of issuance of said form. If the trade and companies register has been notified of a modification since then, it is possible that it has not been [taken into account](#) when issuing this form.

Administrator(s)/Manager(s)

Statutory rules for signature (indication)

The Company is considered to have ~~entered into~~ an undertaking in respect of a third party either by the individual signature of the technical manager, or by the joint signature of a technical manager and an administrative manager. The Company is also considered to have ~~entered into~~ an undertaking in respect of a third party by the signature of any person to whom the Board has delegated special powers.

		Modify	Remove
1 REZAI-TABRIZI Mohammad Reza	page 3	☒	☐

1 [REZAI-TABRIZI Mohammad Reza](#)Modify ☒Remove ☐**Natural person**

Name

[REZAI-TABRIZI](#)

First name(s)

[Mohammad Reza](#)

Date of birth

Place of birth

Country of birth

Private or professional address

Number

Street

Building

Floor

Postcode

Town

Country

Mandate type

Company body

[management board](#)

Role

[administrative manager](#)

Signing authority

Duration of mandate

Date of appointment

[26/02/2015](#)

Duration of mandate

[Indefinite](#)

Mandate expires on

DD/MM/YYYY

or

at the general meeting to take place in the year

YYYY

Trade and Companies Register

B152619 – L150050074

submitted 19/03/2015

KSANTEX S.à.r.l.

Limited liability company

Head office:

Registered capital: €12,500

RCS Luxembourg: B 152.619

Corrective copy

During the extraordinary general meeting of the limited liability company **KSANTEX S.à.r.l.**, established and with its registered office at [REDACTED] registered with the Luxembourg Trade and Companies Register under number B 152.619, as recorded in a deed established by the [REDACTED], notary resident in Luxembourg, on 26 February 2015, not yet published in Mémorial C, Compendium of Companies and Associations,

document registered at Luxembourg Registry Office, 5 March 2015, LAC/2015/4840, for a fee of seventy-five euros € and submitted to the Luxembourg Trade and Companies Register on 11 March 2015 under number L150045618, an error was introduced into the fourth resolution regarding the first name of the administrative manager REZAI-TABRIZI, which is "Mohammad Reza" and not "Mohamed Reza".

The fourth resolution should consequently read as follows:

"FOURTH RESOLUTION"

The Sole Partner decides to name the following persons as administrative managers for an indefinite period:

- Mr Robert Alexander STEWART, [REDACTED] residing professionally at House of Commons, London, SW1A 0AA; and
- Mr Mohammad Reza REZAI-TABRIZI, [REDACTED]

Copy certified as correct

signed:

Notary [REDACTED]

Luxembourg, 13 March 2015.

Registered at Luxembourg Registry Office 2, 17 March 2015

Related to: 2LAC/2015/5625

Fee paid twelve euros

€12.00

Submission references

Trade and Companies Register

Luxembourg

RCS

RCS number: B152619
Submission reference: L170043636
Submitted 20/03/2017

Statutory change

Principal establishment

KSANTEX S.à.r.l
B152619

Limited liability company



Data to be modified

☐ Company name

☐ Associates

☐ Trading name(s)

☐ Administrator(s)/Manager(s)

☐ Legal form

☐ Day-to-day managers

☐ Head office

☐ Person(s) responsible for financial audit

☒ Company purpose

page 2

☐ Merger/Demerger

☐ Share capital/Capital

☐ Transfer of assets, of business sector, of
totality, of corporate assets

☐ Duration

☐ Voluntary liquidation

☐ Fiscal year

In application of article 21 paragraph 2 of the modified Law of 19 December 2002 on trade and companies registration and business accounting and annual accounts and article 21 of the modified grand-ducal regulation of 23 January 2003 implementing the Law of 19 December 2002, this form contains as a minimum the up-to-date information communicated to the trade and companies register up to three days before the date of issuance of said form. If the trade and companies register has been notified of a modification since then, it is possible that it has not been taken into account when issuing this form.

Company purpose

Company purpose (indication)

2.1 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.

2.2 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.

2.3 It may carry out all operations relating directly or indirectly to the acquisition of holdings in any form, in any company taking the form of a capital company or partnership, as well as the administration, management, control and development of those holdings.

2.4 It may in particular use its funds for the creation, management, enhancement and liquidation of a portfolio composed of all securities, participate in its creation, development and control, acquire by way of contribution, subscription, underwriting or call option and in any other manner all securities, realise them by means of sale, transfer, exchange, grant any assistance, loans, advances or guarantees to any company in which it has a direct or indirect interest. It may acquire, develop, receive and license patents,

☒ Company purpose incomplete

Trade and Companies Register
RCS number: B152619
Submission number: L17003636
Submitted 20/03/2017

KSANTEX S.à.r.l.
Limited liability company
Head office: [REDACTED]
[REDACTED]
RCS Luxembourg: B 152.619

RESOLUTIONS OF THE SHAREHOLDERS
of 7 March 2017
No. 435/2017

In the year two thousand and seventeen, on the seventh of March,
Before Us, [REDACTED] notary residing in Luxembourg,
Grand Duchy of Luxembourg.

Appeared:

1) GOALSBRIDGE S.A., a public limited company incorporated under Luxembourgish law, established and with its principal office at [REDACTED] and registered on the Luxembourg Trade and Companies Register under number B 197.217;

2) Java Newtech Limited, a company incorporated under Cypriot law, established and with its principal office at [REDACTED]

3) [REDACTED], managing director, born [REDACTED] on 11 February 1987, whose professional address is at [REDACTED] and [REDACTED]

4) SERINI SARL, a limited liability company incorporated under Luxembourgish law, established and with its principal office at [REDACTED] registered on the Luxembourg Trade and Companies Register under number B 169.931.

The four (4) parties are represented here by [REDACTED] a private employee, residing professionally at [REDACTED] Luxembourg, by virtue of four (4) powers of attorney privately established in Luxembourg, Grand Duchy of Luxembourg, on 7 March 2017.

Said powers of attorney signed "*ne varietur*" by the representative of the parties appearing and the undersigned notary shall remain annexed to the present document and shall be formally registered with it.

Said parties appearing are the sole shareholders (the Shareholders) of the company KSANTEX S.à.r.l. (the Company), a limited liability company with its head office at [REDACTED] incorporated as recorded in a deed established by the notary [REDACTED] notary residing in Luxembourg, on 20 April 2010, published in Mémorial C, Compendium of Companies and Associations of 1 June 2010, number 1140. The company statutes were modified most recently as recorded in a deed established by the senior notary, published in Mémorial C, Compendium of Companies and Associations on 23 April 2015 under number 1072.

The appearing parties, representing the entire share capital of the Company and having waived any invitation, considered the following agenda:

AGENDA

1. Complete overhaul of the statutes to bring them in line with the law of 10 August 2016 updating the law of 10 August 1915 concerning commercial companies, without changing the denomination, share capital, head office, signatory power or fiscal year, but modifying the company purpose, and adding to them a clause authorising the management board to proceed with interim dividends, as follows:

“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.

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.

It may carry out all operations relating directly or indirectly to the acquisition of holdings in any form, in any company taking the form of a capital company or partnership, as well as the administration, management, control and development of those holdings.

It may in particular use its funds for the creation, management, enhancement and liquidation of a portfolio composed of all securities, participate in its creation, development and control, acquire by way of contribution, subscription, underwriting or call option and in any other manner all securities, realise them by means of sale, transfer, exchange, grant any assistance, loans, advances

or guarantees to any company in which it has a direct or indirect interest. It may acquire, develop, receive and license patents, brands and other industrial property rights.

The company may manage its own property assets through purchase, rental, development and sale of any property and property rights.

In general, the company may carry out all other commercial, industrial, financial, security and property transactions directly or indirectly connected with its purpose or likely to assist its operation and development.”

“In conformity with article 198b of the 1915 Law, interim dividends may be distributed at any time by the Board, in compliance with the following cumulative conditions:

(i) an accounting statement is drawn up by the Board (the Interim Accounting Statement) (the Interim Accounting Statement must be subject to examination by a supervisory auditor or by a statutory auditor where such a statutory auditor has been nominated);

(ii) these interim accounts must show that sufficient profits and other reserves (including the share premium) are available for a distribution, it being understood that the amount to be distributed cannot exceed the total profits made since the end of the last fiscal year whose annual accounts have been approved, where necessary, augmented by deferred profits and the amounts to be allocated to the statutory reserve;

(iii) the decision to distribute the interim dividends must be adopted by the Board in the two (2) months following the interim accounts; and

(iv) taking into account the Company's assets, the rights of the Company's creditors must not be threatened.

If the interim dividends paid out exceed the total profits distributable at the end of the fiscal year, the excess in question, as recognised by the Annual General Meeting, should, in the absence of a decision to the contrary by the Board upon declaration of dividends, be considered as an interim payment on future dividends. Without prejudice to this rule, if the interim dividends that have been distributed exceed the profits distributable at the end of the fiscal year, the shareholders must immediately repay the excess to the Company.

22.2 Without prejudice to the Board's competence as set out in article 22.1 above, the Annual General Meeting may also distribute

interim dividends from time to time, while respecting the same conditions (including examination of the Interim Accounting Statement).

22.3 Any share premium, assimilated premium or other distributable reserve may be freely distributed to the shareholders subject to the provisions of the Law and the present statutes.”; and

2. Miscellaneous.

Having considered the points on the agenda, the party appearing asked the acting notary to record the following resolutions:

FIRST AND ONLY RESOLUTION

The general meeting has decided to approve the complete overhaul of the statutes to bring them in line with the law of 10 August 2016 updating the law of 10 August 1915 concerning commercial companies, without changing the denomination, share capital, principal office, signatory power or fiscal year, but modifying the company purpose and adding to them a clause authorising the management board to proceed with interim dividends. The Statutes shall henceforth be set out as follows:

“A. NAME – PURPOSE – DURATION – HEAD OFFICE

Article 1 Name – Form

There exists a limited liability company named “KSANTEX S.à.r.l.” (hereinafter the “Company”), which shall be governed by the law of 10 August 1915 concerning commercial companies, as amended by, among others, the law of 10 August 2016 (the “Law”), as well as by the present statutes.

Article 2 Purpose

2.1 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.

2.2 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.

2.3 It may carry out all operations relating directly or indirectly to the acquisition of holdings in any form, in any company taking the form of a capital company or partnership, as well as the administration, management, control and development of those holdings.

2.4 It may in particular use its funds for the creation, management, enhancement and liquidation of a portfolio composed of all securities,

participate in creation, development and control, acquire by way of contribution, subscription, underwriting or call option and in any other manner all securities, realise them by means of sale, transfer, exchange, grant any assistance, loans, advances or guarantees to any company in which it has a direct or indirect interest. It may acquire, develop, receive and license patents, brands and other industrial property rights.

2.5 The company may manage its own property assets through purchase, rental, development and the sale of any property and property rights.

2.6 In general, the company may carry out all other commercial, industrial, financial, security and property transactions directly or indirectly connected with its purpose or likely to assist its operation and development.

Article 3 Duration

3.1 The Company is established for an indefinite period.

3.2 It may be dissolved at any time and without cause by a decision of the general meeting of shareholders, adopted in accordance with the conditions required for a modification of the present statutes.

Article 4 Head office

4.1 The Company's head office is established in the municipality of Luxembourg, Grand Duchy of Luxembourg.

4.2 The head office may be transferred within the same municipality by a decision of the sole manager or, in the case of more than one manager, by the management board.

4.3 It may be transferred to any other municipality of the Grand Duchy of Luxembourg either (i) by a decision of the general meeting of shareholders, adopted in accordance with the conditions required for a modification of the present statutes, or (ii) by a decision of the sole manager or, in the case of more than one manager, by the management board. In the latter case, the sole manager or, in the case of more than one manager, the management board, shall have all powers to proceed with all the formalities by means of a notarised deed (statement) in order to reflect this modification in the Company's statutes.

4.4 Branches or offices may be created, both in the Grand Duchy of Luxembourg and abroad, by a decision of the management board.

4.5 In the instance that the management board feels that exceptional political, economic or social events or natural disasters have occurred or are imminent,

of a nature to interfere with the Company's normal activities at its company headquarters, it may provisionally transfer the company headquarters abroad until the complete cessation of these exceptional circumstances; these provisional measures shall however have no effect on the Company's nationality, which, notwithstanding this provisional transfer, shall remain Luxembourgish.

B. SHARE CAPITAL – COMPANY SHARES

Article 5 Share capital

5.1 The Company's share capital is fixed at twelve thousand five hundred euros (€12,500), represented by one thousand two hundred and fifty (1,250) company shares with a nominal value of ten euros (€10) each.

5.2 The Company's share capital may be augmented or reduced by a decision of the Company's general meeting of shareholders, adopted in accordance with the conditions required for the modification of the present statutes.

5.3 The Company may buy back its own shares.

Article 6 Company shares

The Company's share capital is divided into company shares each with the same nominal value.

6.2 The Company's shares are nominative.

6.3 The Company may have one or more shareholders, with a maximum number of one hundred (100) shareholders.

6.4 The death, suspension of civil rights, dissolution, liquidation, bankruptcy or insolvency or any other similar eventuality of one of the shareholders shall not lead to the dissolution of the Company.

Article 7 – Register of company shares – Transfer of company shares

7.1 A register of company shares is held at the Company's head office where it is made available to any shareholder for consultation. This register contains all the information required by the Law. Subscription certificates may be issued at the request of the shareholder and at their expense.

7.2 The Company recognises only one shareholder per company share. Undivided co-owners shall name a sole representative who shall represent them in respect of the Company. The Company has the right to suspend the exercise of all rights relating to that company share until such a representative has been designated.

7.3 The company shares are freely transferable between shareholders.

7.4 *Inter vivos*, the company shares shall be transferable to new shareholders solely on the proviso that such transfer has been

approved by the shareholders representing a majority of half (1/2) of the share capital.

7.5 Any transfer of company shares is enforceable against the Company or against third parties upon notification of the transfer to or after the acceptance of the transfer by the Company, in accordance with the provisions of article 1690 of the Civil Code.

C. DECISIONS OF THE SHAREHOLDERS

Article 8 Collective decisions of the shareholders

8.1 The general meeting of shareholders is invested with the powers expressly reserved to it by the Law and by the present statutes.

8.2 Each shareholder has the opportunity to participate in collective decisions, whatever the number of shares they hold.

8.3 In the instance that and as long as the Company has no more than sixty (60) shareholders, collective decisions that would ordinarily fall within the competence of the general meeting may be validly adopted by means of written decisions. In such an instance, each shareholder shall receive the text of these resolutions or decisions to be adopted, expressly formulated, and shall vote in writing.

8.4 In the case of a sole shareholder, this shareholder shall exercise the powers delegated to the general meeting of shareholders by virtue of the provisions of section XII of the Law and the present statutes. In this instance, any reference made to the "general meeting of shareholders" should be understood as a reference to the sole shareholder, depending on the context and if required, and the powers delegated to the general meeting of shareholders shall be exercised by the sole shareholder.

Article 9 General meetings of shareholders

In the instance that the Company has more than sixty (60) shareholders, a general meeting of shareholders must be held at a minimum within the six (6) months following the end of the fiscal year in Luxembourg at the Company's head office or at any other location specified in the invitation to said general meeting. Other general meetings of shareholders may be held in places and at times indicated in the invitations to the corresponding general meetings. If all the shareholders are present or represented at the general meeting of shareholders and waive the formalities of invitation, the meeting may be held without prior invitation or publication.

Article 10 Quorum and vote

10.1 Each shareholder has a number of votes equal to the number of shares they hold.

10.2 Subject to a higher quorum set out in the present statutes or in the Law, collective decisions of the Company's shareholders

shall only be validly adopted as long as they have been adopted by shareholders holding more than half (1/2) of the share capital. If this figure is not reached at the first meeting or consultation in writing, the shareholders may be invited or consulted a second time by registered letter with the same agenda and the decisions are validly taken by a majority of votes cast, whatever proportion of the share capital they represent.

10.3 Any shareholder may take part in the shareholder meetings by designating in writing, via fax, email or any other means of communication another person as their proxy.

10.4 Those shareholders taking part in a meeting via videoconference or any other means of communication that makes it possible to identify them are considered to be present when calculating quorums and votes. The means of communication used must make it possible for all persons participating in the meeting to hear one another continuously and should permit the effective participation of all these persons in the meeting.

Article 11 Modification of the statutes

Any modification of the statutes, including a change to the Company's nationality, requires the agreement of (i) a majority of the shareholders (ii) representing at least three quarters (3/4) of the share capital.

D. MANAGEMENT

Article 12 Powers of the sole manager – Composition and powers of management board

12.1 The Company may be managed by one or more managers. If the Company has more than one manager, the managers form a management board.

12.2 When the Company is managed by a sole manager, where necessary and where the term "sole manager" is not expressly mentioned in the statutes, a reference to "management board" in these statutes should be understood as a reference to the "sole manager".

12.3 The management board is invested with the broadest powers to act in the name of the Company and to take all measures necessary or useful to the fulfilment of the Company's purpose, with the exception of the powers reserved by the Law or by the present statutes to the general meeting of shareholders.

Article 13 Nomination, dismissal of managers and duration of mandate of managers

13.1 The manager(s) is (are) named by the general meeting of shareholders, which determines their remuneration and the duration of their

mandate. The general meeting of shareholders may decide to qualify designated members of the management board as category A managers (the "Category A Managers") or category B managers (the "Category B Managers").

13.2 The manager(s) is (are) named and may be freely dismissed at any time, with or without cause, by a decision of the shareholders representing more than half of the Company's share capital.

Article 14 Vacant management post

14.1 In the instance where a management post becomes vacant following a death, legal incapacity, bankruptcy, resignation or any other cause, this vacancy may be filled temporarily, and for a period that may not exceed that of the initial mandate of the manager replaced, by the remaining managers until the next shareholder meeting called to decide on the permanent nomination, in accordance with the applicable legal provisions.

14.2 In the instance where the vacancy occurs while the Company is managed by a sole manager, the vacancy is filled without delay by the general meeting of shareholders.

Article 15 Invitation to management board meetings

15.1 The management board meets when convened by any manager. The management board meetings are held at the Company's head offices unless otherwise specified in the meeting invitation.

15.2 Written notice of any management board meeting must be given to managers at least twenty-four (24) hours in advance of the time stated in the invitation, except in urgent cases, in which case the nature of and cause for such urgency will be mentioned in the invitation. Such an invitation may be omitted with the written agreement of each manager, by fax, email or any other means of communication. A signed copy of such a document shall constitute sufficient proof of such an agreement. No prior invitation shall be demanded for a management board if its place and time were determined by a decision adopted at a previous management board, communicated to all members of the management board.

15.3 No prior invitation shall be required in the instance where all the managers are present or represented at a management board and waive the invitation formalities, or in the instance of written decisions approved by all the members of the management board.

Article 16 Conduct of management board meetings

16.1 The management board may elect a chair of the management board from among its members. It may also designate a secretary, who may not be a member of the management board, and who will be responsible for taking the minutes of management board meetings.

16.2 The chair of the management board, where necessary, presides over all management board meetings. In their absence, the management board may provisionally name another manager as temporary chair on a vote by a majority of those present or represented at the meeting.

16.3 Any manager may be represented at any management board meeting by designating any other manager as their proxy in writing, by fax, email or any other means of communication, and a copy of the mandate shall constitute sufficient proof. A manager may represent one or more, but not all the members of the management board.

16.4 The management board meetings may also be held via teleconference or videoconference or by any other similar means of communication that enables all persons participating to hear one another without discontinuity and guarantees effective participation in the meeting. Participation in a meeting by such means is equivalent to participating in person and the meeting held by such means of communication is considered to be held at the Company's head offices.

16.5 The management board may only deliberate or act validly if the majority of its members are present or represented at a management board meeting and at least one (1) Category A Manager and one (1) Category B Manager.

16.6 Decisions are taken by a majority vote of managers present or represented at each management board meeting. The chair of the management board, where necessary, does not have a deciding vote.

16.7 The management board may unanimously take decisions by means of a circular letter by expressing its approval in writing, via fax, email or any other means of communication. Each manager may express their consent separately, with the total consents attesting to the adoption of the decisions. The date of the decisions shall be the date of the last signature.

Article 17 Minutes of management board meetings; minutes of decisions of sole manager

17.1 The minutes of all management board meetings shall be signed by the chair, where applicable, or, in their absence, by the temporary chair, and the secretary, where applicable, or by two (2) managers. Copies or extracts of these minutes that may be produced in court or otherwise shall be, where applicable, signed by the chair or by two (2) managers.

17.2 The decisions of the sole manager are transcribed in minutes that shall be signed by the sole manager. Copies or extracts of these minutes that may be produced in court or in any other context shall be signed by the sole manager.

Article 18 Relationships with third parties

18.1 The Company shall be considered to have entered into an undertaking in respect of third parties (i) via the individual signature of the sole manager or (ii) by the individual signature of the technical manager or (iii) by the joint signature of a technical manager and an administrative manager.

18.2 Nevertheless, if the shareholders have designated the managers as Category A Managers and Category B Managers, the Company shall only be considered to have entered into an undertaking in respect of third parties by the joint signature of one (1) Category A Manager and one (1) Category B Manager.

18.3 The Company shall likewise be considered to have entered into an undertaking in respect of third parties by the joint signature or by the individual signature of any person to whom the day-to-day management of the Company has been delegated, within the context of that day-to-day management, or by the joint signature or the individual signature of any person to whom that signing power has been delegated by the management board, but only within the limits of that power.

E. AUDIT AND OVERSIGHT

Article 19 Supervisory auditor(s) – statutory auditor(s)

19.1 In the instance where and as long as the Company has no more than sixty (60) shareholders, the Company's operations shall be overseen by one or more supervisory auditors. The general meeting of shareholders shall designate the supervisory auditors and determine the duration of their duties.

19.2 A supervisory auditor may be dismissed at any time, without prior notice and without cause, by the general meeting of shareholders.

19.3 The supervisory auditor has an unlimited permanent right of oversight and inspection over all the Company's operations.

19.4 If the Company's shareholders designate one or more statutory auditors in accordance with article 69 of the law of 19 December 2002 on the trade and companies register

and company accounting and annual accounts, as amended, the role of the supervisory auditor shall be done away with.

19.5 The statutory auditor may only be dismissed by the general meeting of shareholders for just cause or with their agreement.

F. FISCAL YEAR – ANNUAL ACCOUNTS – ALLOCATION OF PROFITS – INTERIM

DIVIDENDS

Article 20 Fiscal year

The Company's fiscal year shall begin on 1 January each year and end on 31 December of the same year.

Article 21 – Annual accounts – Allocation of profits

21.1 At the end of each fiscal year, the accounts are closed and the management board draws up an inventory of the Company's assets and liabilities, the balance sheet and the profit and loss account, in accordance with the law.

21.2 Of the Company's annual net profits, at least five per cent (5%) shall be allocated to the statutory reserve. This allocation shall cease to be obligatory as soon as and as long as the Company's statutory reserve reaches ten per cent (10%) of the Company's share capital.

21.3 The sums contributed to a reserve of the Company by a shareholder may also be allocated to the statutory reserve, if that shareholder consents to the allocation.

21.4 In the case of a reduction of share capital, the Company's statutory reserve may be reduced in proportion so that it does not exceed ten per cent (10%) of the share capital.

21.5 When proposed by the management board, the general meeting of shareholders decides the allocation of the Company's distributable profit balance in accordance with the Law and the present statutes.

21.6 The distributions to shareholders are made in proportion to the number of shares they hold in the Company.

Article 22 Interim dividends – Share premiums and assimilated premiums

22.1 In conformity with article 198b of the 1915 Law, interim dividends may be distributed at any time by the Board, in compliance with the following cumulative conditions:

(i) an accounting statement is drawn up by the Board (the Interim Accounting Statement) (the Interim Accounting Statement must be subject to examination by a supervisory auditor or by a statutory auditor where such a statutory auditor has been nominated);

(ii) these interim accountings must show that sufficient profits and other reserves (including the share premium) are

available for a distribution, it being understood that the total to be distributed cannot exceed the total profits made since the end of the last fiscal year whose annual accounts have been approved, where applicable, augmented by deferred profits and the amounts to be allocated to the statutory reserve;

(iii) the decision to distribute the interim dividends must be adopted by the Board in the two (2) months following the interim accounts; and

(iv) taking into account the Company's assets, the rights of the Company's creditors must not be threatened.

If the interim dividends paid out exceed the total profits distributable at the end of the fiscal year, the excess in question, as recognised by the Annual General Meeting, should, in the absence of a decision to the contrary by the Board upon declaration of dividends, be considered as an interim payment on future dividends. Without prejudice to this rule, if the interim dividends that have been distributed exceed the profits distributable at the end of the fiscal year, the shareholders must immediately repay the excess to the Company.

22.2 Without prejudice to the Board's competence as set out in article 22.1 above, the Annual General Meeting may also distribute interim dividends from time to time, while respecting the same conditions (including examination of the Interim Accounting Statement).

22.3 Any share premium, assimilated premium or other distributable reserve may be freely distributed to the shareholders subject to the provisions of the Law and the present statutes.

G. LIQUIDATION

Article 23 Liquidation

23.1 In the case of dissolution of the Company in accordance with article 3.2 of the present statutes, the liquidation shall be carried out by one or more liquidators named by the general meeting of shareholders that decided on the dissolution and which shall set the powers and fees of each liquidator. Unless otherwise stated, the liquidators shall have the broadest powers for the realisation of the Company's assets and liabilities.

23.2 The surplus resulting from the realisation of the assets and liabilities shall be distributed among the shareholders in proportion to the number of shares they hold in the Company.

H. FINAL DISPOSAL – APPLICABLE LAW

Article 24 Applicable law

Everything not governed by the present statutes shall be determined in conformity with the Law.”

WARNING

The notary advised the parties appearing of the fact that before any commercial activity of the Company whose purpose is hereby modified, they must be in possession of a trading permit in due form relating to the company's purpose, which the parties appearing expressly acknowledged.

Costs

The parties have evaluated the total costs and expenses, remuneration and charges, in whatever form, that are the responsibility of the Company or are charged to it by reason of its constitution at around one thousand eight hundred euros (€ 1,800).

Witnessed, in Luxembourg, on date indicated above.

Further to reading hereof and interpretation hereof being provided to the representative of the parties appearing, known to the notary by name, usual first name, status and residence, the representative signed the present document with the notary.

Signed: [REDACTED]

Recorded at Luxembourg Registry Office 2, 8 March 2017.

Related to: 2LAC/2017/4749

Received seventy-five euros

€ 75

Recipient/signed/ [REDACTED]

FOR CERTIFIED COPY

delivered at the request of the abovementioned company, for entry in the Trade Register.

Luxembourg, 20 March 2017

Submission references

RCS number: B152619
 Submission reference: L170143241
 Submitted [25/07/2017](#)

Trade and Companies Register

Luxembourg

RCS

Statutory change

Principal establishment

KSANTEX S.à.r.l.
 B152619
Limited liability company

Types of mandate covered by the [modification](#)☒ Administrator(s)/Manager(s) page 2☐ Person(s) responsible for financial audit☐ Day-to-day manager(s)

Administrator(s)/Manager(s)

		Modify	Remove
1 STEWART Robert Alexander	page 3	☐	☒
2 REZAI TABRIZI Mohammad Reza	page 4	☐	☒

1 STEWART Robert Alexander

Modify ☐Remove ☒**Resignation of officer**

The officer informed the trade and companies register of his resignation on 18/07/2017.

☐ Register a new [mandate](#)**Natural person**

Name

STEWART

First name(s)

Robert Alexander

Date of birth

[REDACTED]

Place of birth

[REDACTED]

Country of birth

[REDACTED]

Private or professional address

Number

[REDACTED]

Street

[REDACTED]

Building

[REDACTED]

Floor

[REDACTED]

Postcode

[REDACTED]

Town

[REDACTED]

Country

[REDACTED]

Mandate type

Company body

management board

Role

administrative manager

Signing authority (indication)

[REDACTED]

Duration of mandate

Date of appointment

26/02/2015

Duration of mandate

Indefinite

Mandate expires on

DD/MM/YYYY

or

at the general meeting to take place in the year

YYYY

2 REZAI-TABRIZI Mohammad Reza

Modify ☐Remove ☒

Resignation of officer

The officer informed the trade and companies register of his resignation on 18/07/2017.

☐ Register a new mandate

Natural person

Name		First name(s)
REZAI-TABRIZI		Mohammad Reza
Date of birth	Place of birth	Country of birth

Private or professional address

Number	Street	
Building	Floor	
Postcode	Town	Country

Mandate type

Company body	Role
Management board	administrative manager
Signing authority	

Duration of mandate

Date of appointment	Duration of mandate
26/02/2015	Indefinite
Mandate expires on	at the general meeting to take place in the year
DD/MM/YYYY	or YYYY

Trade and Companies Register
RCS number: B152619
Submission reference: L170143241
Submitted [25/07/2017](#)

KSANTEX S.à.r.l.
Limited liability company


B152619

Copy for [publication](#)

Nomination, [renewal](#) or end of mandate for officers and/or persons
responsible for financial audit.

KSANTEX S.à.r.l. submitted the following information to the trade and companies register on
25/07/2017:

Administrators/managers

Removal

STEWART Robert Alexander

Role: administrative manager

Body: management board

REZAI-TABRIZI Mohammad Reza

Role: administrative manager

Body: management board

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



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18/09/2017

CHAPS/International

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KSANTEX S.A.R.L.

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CHAPS/International

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KSANTEX SARL

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Bob Stewart DSO MP
House of Commons
London
SW1A 0AA

Daniel Greenberg CB
Parliamentary Commissioner for Standards
House of Commons
London SW1A 0AA

8th May 2024

Dear Commissioner,

Thank you for the opportunity to comment on your report. May I respond by making two points which matter to me?

Firstly, I never for a moment thought that KSantex was a Defence related company and thus felt no requirement to declare it as such in the Defence Committee. Indeed, it was not and is not to this day.

Secondly, 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. For the life of me, I cannot recall why I did not again. I gained nothing from such an omission. It was a mistake, but it was just that. I had no intention of breaching the Nolan Principles and certainly I had no wish to mislead you in any interviews we have had. My answers to your questions were given in good faith and also what I believed to be the case at the time.

In conclusion I am sorry for all the trouble I have caused and apologise again.

With best wishes,

Yours Faithfully,

Bob Stewart
