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Summary

Introduction

5 This memorandum reports on the inquiry that I commenced on 22 April 2025 in response to a self-referral from Charlie Maynard MP. The inquiry concerned a breach of Rule 5 of the Code of Conduct for Members, consisting of a failure to register the receipt of pro bono legal advice before the 28-day deadline set by the House expired.

Rule 5 - Registration of Interests

10 During my investigation I reviewed Mr Maynard's entry in the Register of Members' Financial Interests. I noted that Mr Maynard had received further pro bono advice, which he had registered outside the 28-day deadline set by the House. I also noted that Mr Maynard had not updated his Register entry before the 28-day deadline set by the House expired, to show that his role as District Councillor for West Oxfordshire District Council had ceased.

15 Subsequently, Mr Maynard made additional self-referrals for late registration of:

- the use of a family member's flat in London; and
- shares valued over the registration threshold.

I extended my investigation to include these additional interests.

20 During my investigation, I sought information from Mr Maynard and the Registrar of Members' Financial Interests.

Having considered the evidence, I am of the view that the pro bono advice, the use of the London flat and the shares are all registrable, and that by failing to register them within the 28-day period set by the House, Mr Maynard breached Rule 5 of the Code of Conduct.

25 It is also my view that by failing to update the Register within the 28-day period allowed by the House to show that his role as District Councillor for West Oxfordshire District Council had ceased, Mr Maynard committed an additional breach of Rule 5 of the Code of Conduct.

30 It is my view that these failings are not apt for resolution by me through the rectification process under Standing Order No. 150(4) as minor interests or inadvertent failures; accordingly, I am referring this matter to the Committee on Standards for consideration.

Rule 12 - Failure to Co-operate with the Commissioner's Inquiries

5 During my investigation Mr Maynard twice informed me incorrectly (on 30 April 2025 and 28 May 2025) that his Register entry was accurate and up to date. In view of this, I extended my inquiry to consider whether, by providing that incorrect information, he failed to co-operate with my investigation and thereby breached Rule 12 of the Code of Conduct.

10 Having reviewed the evidence I concluded that, although Mr Maynard's actions do not reflect a conscientious approach to the registration of interests and resulted in my inquiry being extended on three occasions, there was no evidence that his actions were deliberate or that he intended to adversely impact my investigation. On that basis I have found no breach of Rule 12 of the Code of Conduct.

Daniel Greenberg CB
Parliamentary Commissioner for Standards
29 September 2025

15

Report

1. Background to the inquiry

- 5 1.1 On 14 March 2025, Charlie Maynard MP informed me that he had failed to register two financial interests before the 28-day deadline set by the House expired.¹ Mr Maynard said that he had been in receipt of pro bono legal advice to support his intervention in the sanctions hearing of Thames Water United Limited's restructuring plan at the High Court and subsequently at the Court of Appeal. Mr Maynard subsequently confirmed that the advice had been provided by:
- 10
- William Day of 3VB Chambers, (advice from 27 December 2024; valued at £242,500 plus VAT; registered 103 days late).
 - Marriott Harrison, (informal advice from 10 January 2025, and formal advice from 20 January 2025; valued at £235,000 plus VAT; registered 78 days late).²
- 15 1.2 On 22 April 2025 I informed Mr Maynard of my intention to start an inquiry into this matter, and he was given the opportunity to make representations.³
- 20 1.3 Mr Maynard responded on 30 April 2025, accepting that the interests were registrable and that he had failed to register them before the 28-day deadline set by the House expired. Mr Maynard said that it did not occur to him that the pro bono legal advice required registration, and that as soon as the matter was brought to his attention, he contacted my office. Mr Maynard also stated that he was otherwise satisfied that his Register was up to date.⁴
- 25 1.4 Having considered Mr Maynard's response, I concluded that Mr Maynard's failure had been inadvertent, and the matter was suitable for resolution through the rectification process available to me under Standing Order No. 150(4). I wrote to Mr Maynard on 2 May 2025 offering to resolve the matter through the rectification process. As part of the rectification, I asked Mr Maynard to confirm that his *"entry on the Register has now been updated to include these interests."*⁵
- 30 1.5 On 9 May 2025, Mr Maynard wrote to me accepting the offer of rectification and stating:

¹ Appendix 2, Page 22, Document 1.

² Appendix 2, Pages 23-24, Documents 3 and 5.

³ Appendix 2, Page 27, Document 8.

⁴ Appendix 2, Page 31, Document 9.

⁵ Appendix 2, Page 32, Document 10.

*"I have now updated entries to the register which reflect all of the pro bono legal advice I have received. I understand from contacting the registrar's office that they should be included in the next version of the register which is due to be published early next week. This will then bring my entry in the register of interests up to date – and I will ensure it continues to be."*⁶

1.6 In accordance with my usual procedure when handling investigations concerning a Member's registered interests, I undertook a review of Mr Maynard's entry in the Register of Members' Financial Interests. My review discovered that, in addition to the pro bono legal advice Mr Maynard had mentioned in his original email of 14 March 2025, he had also registered, outside the 28-day deadline set by the House, pro bono legal advice received from:

- Rix Mokai, (advice between 1 March 2025 and 1 May 2025; valued at £79,560; registered 33 days late);
- Rabin Kok, (advice between 1 March 2025 and 1 May 2025; valued at £29,160; registered 33 days late);
- Lucas Jones, (advice between 27 December 2024 and 1 May 2025; valued at £27,300; registered 103 days late) and;
- Marriott Harrison (additional advice between 10 April 2025 and 7 May 2025; valued at £17,842.80; registered 1 day late).

1.7 I also discovered that Mr Maynard had failed to update the Register within 28-days, as required by Rule 5 of the Code of Conduct, to record a change in registrable interests when his role as District Councillor for West Oxfordshire District Council had ended; the change was recorded 29 days late.

1.8 On 21 May 2025, I wrote to Mr Maynard informing him of my decision to withdraw the offer of rectification and to extend my investigation of a breach of Rule 5 to include these additional matters. I also informed Mr Maynard that I intended to extend the inquiry to include consideration of whether, by incorrectly stating on 30 April 2025 that his entry in the Register of Members' Financial Interests was up to date, he failed to co-operate in the conduct of my investigation and thereby breached Rule 12 of the Code of Conduct.⁷

1.9 Mr Maynard responded on 28 May 2025.⁸ In his email, Mr Maynard accepted that he had failed to register the additional pro bono advice before the 28-day deadline set by the House expired. Mr Maynard said that he had

⁶ Appendix 2, Page 35, Document 11.

⁷ Appendix 2, Page 35, Document 12.

⁸ Appendix 2, Page 42, Document 13.

misunderstood the structure of the legal team; as they had been instructed by Marriott Harrison, he had believed their fees to have been included in the figures provided by Marriott Harrison. Mr Maynard said that as soon as he became aware of the additional interests, he added them to the Register. Mr Maynard said that this had been an inadvertent error on his part and not an attempt to hide the fact that he had received the support.

1.10 Mr Maynard also accepted that he had failed to update the Register to show the cessation of his role as a District Councillor before the 28-day deadline set by the House expired. Mr Maynard said that this had been an oversight as he had not remembered that the interest was coming to an end. Mr Maynard said that it was drawn to his attention when he was updating the Register with the pro bono advice. Mr Maynard said that the fact that he was stepping down as a Councillor was in the public domain and that he had not attempted to hide it.

1.11 Finally, Mr Maynard accepted that on 30 April 2025, he had incorrectly informed me that his Register entry was up to date. He stated that the provision of incorrect information had been unintentional, and he confirmed that his Register entry was now up to date.

1.12 On 2 June 2025, Mr Maynard emailed my office notifying me of an unregistered interest. Specifically, he explained that since his election to Parliament in July 2024, a family member had allowed him to stay in her London flat while in Westminster. Mr Maynard also enclosed advice received from the Registrar of Members' Financial Interests on this point.⁹

1.13 Accordingly, on 10 June 2025, I wrote to Mr Maynard informing him of my decision to extend the investigation of a breach of Rule 5 to include the failure to register the use of the London flat, and to extend the investigation of a breach of Rule 12 of the Code of Conduct to include the assurance he made on 28 May 2025 that his Register entry was up to date.¹⁰

1.14 On 18 June 2025, Mr Maynard responded to my letter.¹¹ He accepted that he had not registered the use of the flat before the 28-day deadline set by the House expired. He said that the use of the flat was an informal arrangement with a family member, with no money involved, nor any contract or discussion as to the equivalent monetary value, as the flat was not available on the open rental market. Mr Maynard said that it had not occurred to him that he would need to register it, but he had been prompted to think of the matter more closely given the other inquiries and realised, as with the pro bono legal advice, that this was a registrable interest.

⁹ Appendix 2, Page 44, Document 14.

¹⁰ Appendix 2, Page 45, Document 15.

¹¹ Appendix 2, Page 50, Document 16.

1.15 Mr Maynard also accepted that he had been incorrect stating on both 30 April and 28 May 2025 that his Register entry was up to date, given he had not registered the use of the flat.

1.16 In the course of that response Mr Maynard also provided details of shareholdings in two Vietnamese companies. He said that he still owned shares in one company, but that interest was below the registrable threshold. The other shares in 315 Holding Company Pte Ltd (Nhi Dong 315) were, however, a registrable interest because he sold them in February 2025 for approximately £126,865.59. Mr Maynard said that the failure to register the shares had been down to his own *"incompetency and distraction rather than by design"* and that he should have remembered the shares when registering his interests but did not.¹² Mr Maynard said that he never played a role in the management or governance of the company and his stake was well below 5%.

1.17 On 23 June 2025, I wrote to Mr Maynard stating that I intended to extend my investigation of a breach of Rule 5 to include his shareholdings in the Vietnamese companies.¹³

1.18 Mr Maynard responded on 30 June 2025 accepting that he had failed to register the interest before the 28-day deadline set by the House expired, stating that it was *"completely unintentional"* and a *"regrettable mistake"* on his part.¹⁴ Mr Maynard added that:

"By reporting the information to you late I realise now have the very real risk of being sanctioned and I take that possibility very seriously. However, I have brought this to your attention because I really want to own this mistake and put it right. I can only say again that I sincerely apologise for this and previous errors."

1.19 On 27 August 2025, Mr Maynard confirmed that on the day he was elected (4 July 2024) the value of the shares in 315 Holding Company Pte Ltd (Nhi Dong 315) was approximately \$185,707.¹⁵

2. The scope of my inquiry

2.1 Overall my investigation has considered whether Mr Maynard breached Rule 5 of the Code of Conduct by failing to register before the 28-day deadline set by the House expired:

¹² Appendix 2, Page 50, Document 16.

¹³ Appendix 2, Page 51, Document 17.

¹⁴ Appendix 2, Page 56, Document 18.

¹⁵ Appendix 2, Page 65, Document 22. Based on the exchange rate at the time, this equates to £138,166.01 ([US Dollar to British Pound currency exchange rates for 2024](#)).

- pro bono legal advice received from William Day;
 - two sets of pro bono legal advice received from Marriott Harrison;
 - pro bono legal advice received from Riz Mokal;
 - pro bono legal advice received from Rabin Kok;
 - 5 • pro bono legal advice received from Lucas Jones;
 - the provision of free accommodation to Mr Maynard since his election in July 2024 for his use while in Westminster; and
 - shareholdings in two Vietnamese companies (one of which was sold on 14 February 2025).
- 10 2.2 My investigation also considered whether Mr Maynard breached Rule 5 of the Code of Conduct by failing to update the Register before the 28-day deadline set by the House had expired, in order to show the termination of his position as District Councillor for West Oxfordshire District Council.
- 15 2.3 Finally, my investigation also considered whether, by incorrectly stating that his entry in the Register of Members' Financial Interests was accurate and complete on 30 April and 28 May 2025, Mr Maynard failed to co-operate with my investigation, contrary to Rule 12.

3. Safe harbour and advice from the Registrar

Safe Harbour

- 20 3.1 On 28 March 2025, I asked the Registrar of Members' Financial Interests ("the Registrar") if Mr Maynard had sought advice regarding the registration of pro bono advice and if the "safe harbour" provisions applied.¹⁶ The Registrar responded on 2 April confirming that there was no record of correspondence with Mr Maynard on this matter.¹⁷
- 25 3.2 In his response to the factual accuracy check,¹⁸ Mr Maynard referred to Code of Conduct advice that he received from me on 19 January 2025.¹⁹ Specifically, that my advice did not mention the duty to register the pro-bono advice. A review of Mr Maynard's request shows that his advice request related to his decision to act as an "intervener" in the Thames Water restructuring plan

¹⁶ Paragraph 16 of the [Guide to the Rules relating to the Conduct of Members](#)

¹⁷ Appendix 2, Page 25, Document 7.

¹⁸ Appendix 2, Page 66, Document 24

¹⁹ Appendix 2, Page 68, Document 24

sanctions hearing in the High Court, and that he did not request advice on the registration of an interest.²⁰ As such, advice was provided to Mr Maynard on his decision to act as an "intervener" only.

Further advice from the Registrar

- 5 3.3 On 21 July 2025 I sought further advice from the Registrar in relation to Mr Maynard's use of the London flat, and the shareholdings.²¹
- 3.4 The Registrar responded on 29 July 2025 stating that he advised Mr Maynard to register the use of the London flat under Category 5 as he was not certain that the family member was resident in the UK.²²
- 10 3.5 The Registrar also confirmed that no specific advice was sought on the shareholding in 315 Holding Company Pte Ltd (Nhi Dong 315).

4. The House of Commons Code of Conduct and the Guide to the Rules relating to the Conduct of Members

4.1 I have outlined the relevant rules and guidance in full at Appendix 2.

15 **5. The registration of interests (Rule 5)**

Agreed facts

(a) The pro bono advice

- 5.1 In his emails dated 14 March 2025,²³ 30 April 2025,²⁴ and 28 May 2025,²⁵ Mr Maynard confirmed that:
- 20 a) he received pro bono legal advice from Marriott Harrison; William Day; Riz Mokal; Rabin Kok; and Lucas Jones;
- b) the value of the pro bono advice from each donor exceeded the £300 threshold set by the House for the registration of gifts benefits and hospitality from UK sources under Category 3 in Chapter 1 of the Guide to
- 25 the Rules relating to the Conduct of Members;

²⁰ Appendix 2, Page 69, Document 24

²¹ Appendix 2, Page 59, Document 19.

²² Appendix 2, Page 60, Document 20.

²³ Appendix 2, Page 22, Document 1.

²⁴ Appendix 2, Page 31, Document 9.

²⁵ Appendix 2, Page 42, Document 13.

- c) the pro bono advice was a registrable interest, being received in connection with Mr Maynard's political activities;
- d) the interests were eventually registered under Category 3 (Gifts, benefits and hospitality from UK sources); and
- 5 e) the interests were registered outside the 28-day period set by the House.

(b) The cessation of Mr Maynard's role as District Councillor

5.2 In his email dated 28 May 2025,²⁶ Mr Maynard confirmed that:

- a) his position as a District Councillor for West Oxfordshire District Council had ended; and
- 10 b) he had failed to amend the Register to reflect this change before the 28-day period set by the House.

(c) The London flat

5.3 In his emails dated 2 June 2025²⁷ and 18 June 2025²⁸ Mr Maynard confirmed that:

- 15 a) since his election in July 2024, he has had an informal agreement with a family member to use their London flat free of charge while he is in Westminster;
- b) the flat was not available to rent on the open market, however the estimated annual commercial rent for the flat exceeded the £300
- 20 threshold set by the House for registration;
- c) the interest was registrable; and
- d) the interest was registered outside the 28-day period set by the House.

²⁶ Appendix 2, Page 42, Document 13.

²⁷ Appendix 2, Page 44, Document 14.

²⁸ Appendix 2, Page 50, Document 16.

(d) The Shareholdings

5.4 In his emails dated 18 June 2025,²⁹ 30 June 2025,³⁰ and 27 August 2025,³¹ Mr Maynard confirmed that:

- a) he had owned shares in two Vietnamese companies;
- 5 b) the value and percentage of the shares owned in One Trip Asia Limited did not meet the threshold for registration;³²
- c) he bought the shares in 315 Holding Company Pte Ltd (Nhi Dong 315) in February 2021;
- 10 d) in July 2024,³³ the approximate value of Mr Maynard's shares in 315 Holding Company Pte Ltd (Nhi Dong 315) exceeded the threshold for registration;
- e) when the shares in 315 Holding Company Pte Ltd (Nhi Dong 315) were sold in February 2025, their value exceeded the threshold for registration;
- 15 f) the interest in 315 Holding Company Pte Ltd (Nhi Dong 315) was registrable; and
- g) the interest was registered outside the 28-day period set by the House.

Disputed facts

5.5 There are no disputed facts.

Analysis

- 20 5.6 I conclude, and Mr Maynard has accepted, that he failed to register before the 28-day period set by the House:
 - pro bono legal advice;
 - use of the London flat;

²⁹ Appendix 2, Page 50, Document 16.

³⁰ Appendix 2, Page 56, Document 18.

³¹ Appendix 2, Page 65, Document 22.

³² On 30 June 2025 Mr Maynard confirmed that he acquired the shares in February 2019 and that the shares were valued below the £75,000 threshold set by the House and less than 1% of the shareholding (Appendix 2, page 56, Document 18).

³³ The date Mr Maynard was elected.

- shareholding in 315 Holding Company Pte Ltd (Nhi Dong 315).

5.7 I also conclude, and Mr Maynard has also accepted, that he failed to update the Register before the 28-day deadline set by the House had expired, in order to show the termination of his role as District Councillor for West Oxfordshire District Council.

6. Mr Maynard's response to the draft memorandum

6.1 In accordance with paragraph 55 of the Procedural Protocol in respect of the Code of Conduct, on 11 September 2025 I sent Mr Maynard a copy of my draft memorandum along with the written evidence that I relied, in order to give him the opportunity to make any comments on the factual accuracy of the document.³⁴

6.2 Mr Maynard responded on 15 September 2025.³⁵ In his response Mr Maynard again acknowledged and apologised for the breaches.

6.3 With respect to the pro bono legal advice, Mr Maynard added that when planning to intervene in the Thames Water High Court proceedings, he wrote to me, the Public Bill Office and the Chief Whip in order to notify each party, *"seek their advice on the fact that [he was] seeking to act as an 'intervener' in the High Court proceedings relating to Thames Water's restructuring plan"*, and state that he would be engaging legal advice on a pro bono basis. Mr Maynard said that he had never attempted to do anything like this before and was very keen to make sure that he did it correctly. Mr Maynard said that I was the only party to respond for his request for advice, and that the reply did not include any reference to the registration of interests. Whilst I note Mr Maynard's comments, for the reasons set out in paragraph 3.2 above, it is my view that the safe harbour provision³⁶ does not apply, as Mr Maynard's advice request related to his actions as an "intervener" and not to registrability.

6.4 Mr Maynard said that whilst he was not attempting to absolve himself of his registration responsibilities, at the time he had only been an MP for six months and, in his view, his actions showed his desire to be compliant. Mr Maynard said that he also believed that his actions showed *"conscientiousness, integrity, a willingness to be accountable for my actions and a desire to be open about my actions"*.

6.5 With respect to the use of the London flat, Mr Maynard said that he discussed his accommodation plans with the Independent Parliamentary Standards Authority ("IPSA") verbally and in writing, shortly after becoming an MP. Mr

³⁴ Appendix 2, Page 66, Document 23

³⁵ Appendix 2, Page 66, Document 24

³⁶ Paragraph 16 of the [Guide to the Rules relating to the Conduct of Members](#)

Maynard said that IPSA did not advise him that he should register the interest in the Register of Members' Financial Interests.

6.6 Again, Mr Maynard said that he was not seeking to absolve himself of his responsibility to register interests, however, in his view, the communications demonstrate that from the outset he was discussing the issue with Parliamentary staff with the *"goal of being compliant"*, and that he was seeking advice on how to be compliant. Mr Maynard added that *"I was pleased to be saving the taxpayer this money and I have now fallen foul by doing so. I think these actions show that I was being conscientious, open and accountable and the act of saving the taxpayer up to £31,840 in the last full financial year suggests integrity rather than a lack of it."*

6.7 Finally, Mr Maynard said that the failure to register the Vietnamese shares was a:

"mistake, plain and simple. I forgot I owned these shares and I should not have forgotten. So yes, I fully accept that I should have been more conscientious here. As soon as I realised that I should have registered them and have registered that I sold them, I did so. I realised that disclosing my mistake would result in a number of negative impacts, but I decided that I would rather fully disclose it than not, as I believe in the Nolan principles and my obligations as an MP".

Mr Maynard added that neither owning nor selling the shares had any bearing on his Parliamentary work and no advantage, financial or otherwise, was gained by Mr Maynard by not registering them.

6.8 I have considered these representations from Mr Maynard and am satisfied that they do not alter my conclusions set out in paragraphs 5.6 and 5.7 above.

7. The failure to co-operate with the Commissioner's investigation (Rule 12)

7.1 To determine whether a Member has failed to co-operate with an inquiry I consider the following:

- Has there been a refusal to provide information or carry out an instruction, for example attending an interview?
- Has the Member provided inaccurate information or been inconsistent in their responses?
- Is there evidence that the Member has attempted to mislead or conceal evidence?

Agreed facts

- 5 7.2 Mr Maynard has accepted that on 30 April 2025 and 28 May 2025, he incorrectly informed me that his Register entry was accurate and complete, because, at that time, his use of the London flat and his shareholding in 315 Holding Company Pte Ltd (Nhi Dong 315) had not been registered.

Disputed facts

- 7.3 There are no disputed facts.

Analysis

- 10 7.4 Mr Maynard has apologised and provided an explanation for his provision of inaccurate information to my inquiry.
- 7.5 During the course of my inquiry, Mr Maynard has provided complete answers to my questions and responded within each deadline that I have set. Apart from the inaccuracies that I have identified, there do not appear to have been any inconsistencies or inaccuracies in his responses.
- 15 7.6 I have reviewed Mr Maynard's explanations and have found no evidence that he deliberately provided incorrect information during my inquiry, or that he attempted to conceal information or frustrate my decision making. On the contrary, when Mr Maynard identified additional interests that had not been registered before the 28-day deadline set by the House expired, he informed
20 me of them.
- 7.7 It is my view that Mr Maynard failed to undertake proper and thorough checks before providing his assurances to me. These failures resulted in a delay in my investigation, as they required the scope of my inquiries to be extended on three occasions.
- 25 7.8 Mr Maynard's piecemeal approach to informing me of additional interests does not reflect a properly conscientious approach towards the registration of interests. However, I have found no evidence that Mr Maynard's provision of inaccurate information was deliberate nor that he intended to obstruct my investigation; and he did not prevent me from reaching a decision.
- 30 7.9 Accordingly, while strongly deprecating the provision of inaccurate information to me in the course of an investigation, I conclude that the evidence does not support a finding that Mr Maynard breached Rule 12 of the Code of Conduct.

8. The relevant Nolan Principles

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

5 Integrity

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

Accountability

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

Openness

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

9. Recommendations

20 9.1 For the reasons given, I consider that Mr Maynard has breached Rule 5 of the Code of Conduct by failing to register before the 28-day period set by the House, the following interests:³⁷

- pro bono legal advice as detailed above;
- use of the London flat as detailed above; and
- shares in 315 Holding Company Pte Ltd (Nhi Dong 315) as detailed above.

25 9.2 For the reasons given, I also consider that Mr Maynard has breached Rule 5 of the Code of Conduct by failing to update the Register before the 28-day period set by the House to show the termination of his role as a District Councillor.

9.3 For the reasons given, I consider that Mr Maynard has not breached Rule 12 of the Code of Conduct.

³⁷ Paragraphs 43 and 53 of the [Procedural Protocol in respect of the Code of Conduct](#)

10. Referral to the Committee on Standards

- 10.1 Standing Order No. 150(4)(a) provides for a rectification procedure for failures of registration or declaration in certain cases involving minor interests or inadvertent failures.
- 5 10.2 Given the high values of the pro bono advice, the Vietnamese shares Mr Maynard sold in February 2025, and the rental costs of the flat, I do not consider the interests in question in this case to be minor.
- 10 10.3 When considering whether Mr Maynard's actions were inadvertent, I have taken into account Mr Maynard's representations during the course of the inquiry and in his email dated 15 September 2025. I have concluded that this was not a case of inadvertence. The number of interests involved, the sporadic nature of Mr Maynard's discoveries and disclosures to me, and his continuing failures while under investigation, all suggest behaviour falling well short of the conscientious fulfilment required by Rule 5 of the Code of Conduct.
- 15 10.4 For those reasons, in accordance with paragraph 53 of the Procedural Protocol in respect of the Code of Conduct, I am referring this case to the Committee on Standards.
- 20 10.5 Although Mr Maynard's representations in his email dated 15 September 2025 do not affect my conclusions, the Committee may wish to have regard to them if and when it comes to consider mitigating factors.

Daniel Greenberg CB

Parliamentary Commissioner for Standards
29 September 2025

Appendix 1: The Code of Conduct and The Guide to the Rules relating to the Conduct of Members

Rule 5

5 Rule 5 of the Code of Conduct ("the Code") states that:

10 *Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days.*

The Guide to the Rules relating to the Conduct of Members provides additional guidance on the application of the Code. Chapter 1 paragraph 2 states:

15 *2. The House therefore 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*
 20 *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.*

Chapter 2 also provides guidance on the threshold for registering an interest:

25 **Category 2: Donations and other support for activities as a Member of Parliament**

Threshold for registration

30 *14. Members must register, subject to the paragraphs below, support for their activities as a Member, or for candidacy at an election for parliamentary or non-parliamentary office, which has a value of more than £1,500, either as a single donation or in multiple donations of more than £500 from the same source in a calendar year.*

Requirements for registration under Category 2(a) and 2(b)

15. This category has two parts:

....

5 *Category 2(b): any other support received by a Member. This includes support received indirectly, for example via a political club.¹⁴ Before accepting any donations registrable under this category, Members must check that they are from a permissible donor. Under the Political Parties, Elections and Referendums Act, Members must not accept impermissible donations and must notify the Electoral Commission within 30 days of receipt.*

16. Under this category Members must register:

10

15 *c) Support in kind, including any of the following, if provided either free or at concessionary rates: advice or information services; receptions and events; training or development for the Member or his or her staff; the services of staff or interns; the provision of office space or equipment; hospitality or travel benefits such as season tickets or parking;*

Category 3: Gifts, benefits and hospitality from UK sources

Threshold for registration

20 *21. Members must register, subject to the paragraphs below, any gifts, benefits or hospitality with a value of over £300 which they receive from a UK source. They must also register multiple benefits from the same source if these have a value of more than £300 in a calendar year.*

Requirements for registration

25 *22. Under this category Members must register: Any benefits which relate in any way to their membership of the House or political activities, if provided by a UK source either free or at concessionary rates,*

....

Legal funds

30 *29. Members should normally register under this category contributions to legal funds (including in-kind contributions). This would apply if, for example, the legal action arose out of activity as a Member of Parliament but the donation was not specifically in support of the Member's activities as a Member of Parliament.*

Category 5: Gifts and benefits from sources outside the UK

Requirements for registration

39. Under this category Members must register:

5 Any benefits which relate in any way to their membership of the House or parliamentary or political activities, if provided by a source outside the UK either free or at concessionary rates, including:

....

b) hospitality in the UK, including receptions, meals and accommodation;

10 Category 7: Shareholdings

Threshold for registration

50. Members must register, subject to the paragraphs below, any holdings which:

15 i) amount to more than 15% of the issued share capital of that company, or more than 15% of a partnership;

ii) are valued at more than £70,000.

Category 8: Miscellaneous

Requirements for registration

54. Under this category Members must register:

20 ...

c) Funds established to defray legal costs arising out of the Member's work, including 'crowdfunded' legal funds for action to which the Member is a party, including stating what (if any) benefit has been received by the Member;

25 d) Any relevant financial interest or material benefit which does not clearly fall into one of the other categories, including any shareholding which falls below the relevant threshold, or any other financial asset, including an asset held in trust, if this meets the test of relevance; in

other words, that it might reasonably be thought by others to influence a Member's actions or words as a Member;

Rule 12

Rule 12 of the Code states that:

- 5 *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.*

10

15

20

Appendix 2: Written Evidence

1. Email from Charlie Maynard MP to the Commissioner, 14 March 2025

Guido Fawkes has just contacted me, correctly stating that I should have updated my Register of Financial Interests to reflect the pro-bono legal advice I have been receiving. I have therefore just forwarded the below message on to the Registrar and am writing to you here to inform you of that. As I state below, I had not appreciated until now that I needed to do this, (but I should have).

From: MAYNARD, Charlie
Sent: 14 March 2025 08:28
To: Registration of Members' Financial Interests
Cc: [redacted]
Subject: Notification

I am writing here to inform you that I have been receiving pro-bono legal advice in order to be able to intervene in the Sanctions Hearing of Thames Water United Limited's Restructuring Plan at the High Court and subsequently at the Court of Appeals. This pro-bono advice has been given by Mr. William Day at 3VB Chambers and Marriott Harrison. I received informal advice from late December and formally engaged Marriott Harrison on 21st January 2025, who in turn engaged Mr. Day.

I would also like to give you my apologies for not registering this sooner. I had not appreciated that I needed to do so.

14 March 2025

2. Letter from the Commissioner to Charlie Maynard MP, 20 March 2025

Thank you for your email of 14 March 2025 and the information you have provided. Before I respond to the substantive issues you have raised, I will first explain the process I follow.

The manner in which I am to deal with allegations and conduct investigations is set out in the Procedural Protocol in respect of the Code, which is approved by the House. The Procedural Protocol states that I can start an investigation into an alleged breach of the rules that has been brought to my attention by the Member concerned (self-referral). When assessing a breach of the rules I must consider whether:

- a) the allegations fall within my remit;
- b) there is sufficient evidence to justify the initiation of an investigation into whether a breach of the Code of Conduct has occurred; and

c) an investigation would be proportionate.

When a matter that could be a breach of the Code is brought to my attention by a Member, I will assess it against the test set out in the Protocol.

5 From the information you have provided, I propose to consider whether this matter engages Rule 5 of the Code of Conduct.

To enable me to assess the matter that you have raised in a fair and timely fashion, and to determine whether to start an inquiry, in accordance with the procedure set by the House, please can you supply the following information by 3 April 2025.

- 10 1. Please provide the date you started receiving informal pro bono legal advice from Marriott Harrison.
2. Please state the value of the legal advice that you have received from Marriott Harrison.
3. Please provide the date you started receiving advice from Mr Day.
4. Please state the value of the legal advice that you have received from Mr Day.
- 15 15 Along with the answers to these questions, please also provide any additional information or evidence you would like me to consider.

20 March 2025

3. Email from Charlie Maynard MP to the Commissioner, 20 March 2025

20 Thank you for your email, please see my answers below. Please let me know if there are any other questions I can help on.

- 25 1. Please provide the date you started receiving informal pro bono legal advice from Marriott Harrison. The first conversation I had with Marriott Harrison was on 10th January. It's reasonable to take that as the first day that they gave any informal advice. I formally engaged the firm on 20th January.
2. Please state the value of the legal advice that you have received from Marriott Harrison. All the advice Marriott Harrison has provided has been on a pro-bono basis.
- 30 3. Please provide the date you started receiving advice from Mr Day. The first conversation I had with William Day was on 27th December 2024. As above, that's a reasonable start date for him providing advice to me.

4. Please state the value of the legal advice that you have received from Mr Day. All the advice that William has provided has been on a pro-bono basis. I have not formally engaged him. He has taken instruction from Marriott Harrison.

20 March 2025

5 **4. Email from the Office of the Parliamentary Commissioner for Standards to Charlie Maynard MP, 21 March 2025**

Thank you for your email.

10 With respect to questions 2 and 4, the Commissioner notes that the advice was provided pro bono, however, in order to assess the matter fully, the Commissioner requires you to state the value of the legal advice you have received, by reference to the charging structure that the persons providing the advice would have applied, had they not agreed to act pro bono.

21 March 2025

15 **5. Email from Charlie Maynard MP to the Office of the Parliamentary Commissioner for Standards, 27 March 2025**

Thank you for your email below regarding what would have been these costs if the lawyers had not been willing to work pro-bono. I have now received the below information:

- 20
- Marriott Harrison have quantified their pro-bono work as solicitors at £235,000, which would have attracted VAT.
 - William Day of 3VB Chambers has written to state that his chambers would have charged a total of £242,500, plus VAT for the four day trial and three day appeal.

Taken collectively, this is a total of £477,500, plus VAT.

25 *27 March 2025*

6. Email from the Office of the Parliamentary Commissioner for Standards to the Registrar of Members' Financial Interests, 28 March 2025

30 We have been notified that Charlie Maynard MP breached the Code of Conduct by failing to register, within the 28-day deadline set by the House, receipt of pro-bono legal advice from:

- William Day - start date 27 December 2024 and value £242,500 + VAT
- Marriott Harrison – start date 10 January 2025 and value £235,000+VAT

The purpose of the advice was to enable Mr Maynard to intervene in the Sanctions Hearing of Thames Water United Limited's Restructuring Plan at the High Court and subsequently at the Court of Appeals.

5 The Commissioner is considering whether Mr Maynard should have declared these interests in accordance with the Rules of Conduct and the Guide to the Rules. In order to assist the Commissioner with his consideration:

1. Please may you confirm, whether, according with the safe harbour provision, Mr Maynard approached you for advice regarding the registration of this interest, and, if he did, what advice he was given.
- 10 2. Please may you also let me know how you would have advised Mr Maynard if he had sought advice from you; and the factors you would take into account when giving that advice.

15 Please note, if an inquiry does result, the material you provide to me would be confidential to the Commissioner's inquiry, but it may be shared with the Member during the investigation. If the material you provide is used during the Commissioner's inquiry, it is likely to be published once the inquiry is closed.

Please can you reply by 11 April 2025

28 March 2025

20 **7. Letter from the Registrar of Members' Financial Interests to the Commissioner, 2 April 2025**

Thank you for your email on 28 March 2025 in relation to Mr Mayard MP.

I have set out my responses to your questions below.

[name redacted]

25 **Please may you confirm, whether, according with the safe harbour provision, Mr Maynard approached you for advice regarding the registration of this interest, and, if he did, what advice he was given.**

I have no record of correspondence in relation to the pro bono advice provided to Mr Maynard.

30 **Please may you also let me know how you would have advised Mr Maynard if he had sought advice from you; and the factors you would take into account when giving that advice.**

Had I been approached for advice, I would have first asked for more detail on what his role was in the legal cases and whether or not he was intervening in the case as part of his activities as a Member of Parliament. If this was in support of his activities as a Member of Parliament, donations that met the threshold, including the provision of pro bono advice, would require registration under Category 2(b) if Mr Maynard received it directly, in accordance with paragraph 16 below:

16. Under this category Members must register:

a) Financial support and sponsorship;

b) Loans and credit arrangements;

c) Support in kind, including any of the following, if provided either free or at concessionary rates: advice or information services; receptions and events; training or development for the Member or his or her staff; the services of staff or interns; the provision of office space or equipment; hospitality or travel benefits such as season tickets or parking;

d) Bequests;

e) Gifts of property.

The threshold for registering support under Category 2 is as follows:

14. Members must register, subject to the paragraphs below, support for their activities as a Member, or for candidacy at an election for parliamentary or non-parliamentary office, which has a value of more than £1,500, either as a single donation or in multiple donations of more than £500 from the same source in a calendar year.

The pro bono advice could fall to be registered under Category 3 if the pro bono support met the provisions of paragraph 29 (below)

Legal funds

29. Members should normally register under this category contributions to legal funds (including in-kind contributions). This would apply if, for example, the legal action arose out of activity as a Member of Parliament but the donation was not specifically in support of the Member's activities as a Member of Parliament.

The threshold for registering under that category is as follows:

21. Members must register, subject to the paragraphs below, any gifts, benefits or hospitality with a value of over £300 which they receive from a UK source. They must also register multiple benefits from the same source if these have a value of more than £300 in a calendar year.

In either case, the support would require registration within 28 days of acceptance.

I would also have advised Mr Maynard that would need to check the permissibility of the donors with the Electoral Commission in accordance with paragraphs 15 and 23 of the Code of Conduct and Guide to the Rules.

2 April 2025

8. Letter from the Commissioner to Charlie Maynard MP, 22 April 2025

Further to my letter of 20 March 2025 and your emails of 14, 20 and 27 March 2025 about your compliance with Rule 5 of the House of Commons Code of Conduct and the Guide to the Rules relating to the Conduct of a Member, I am writing to inform you of my decision to open a formal inquiry.

My inquiries

Although I have decided to open a formal inquiry, this does not mean that I have formed a view on whether a breach of the House's rules has occurred. My investigations are inquisitorial, and I will seek to establish the facts in a fair, independent, and thorough manner, taking evidence from you, and any other sources as necessary, before reaching a conclusion on the balance of probabilities. How I conduct my inquiries is laid out in the Procedural Protocol in respect of the Code of Conduct, which was drafted by the Committee on Standards and has been approved by the House.

What I am investigating

I initially intend to investigate the following issue:

1. Whether by failing to register the pro-bono legal advice that you received from Mr William Day and Marriott Harrison within the 28-day deadline set by the House, you have breached Rule 5 of the Code of Conduct.

At the conclusion of my investigation, I will reach an opinion on both the facts of what has happened and whether those facts amount to a breach of Rule 5 of the Code of Conduct. As outlined above, I will use the balance of probabilities to form that opinion.

If during my investigation new evidence comes to light that changes the scope of my inquiry, I will update you formally in writing.

The relevant rules of the House

5 The overarching rules are found in the House of Commons' Code of Conduct for Members. Rule 5 of the Code states:

10 "Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days."

15 The Guide to the rules relating to the conduct of Members, which is appended to the Code, contains more detail about the registration of financial interests. Chapter 1, paragraphs 14, 16 and 29 state:

"Category 2: Donations and other support for activities as a Member of Parliament

Threshold for registration

20 14. Members must register, subject to the paragraphs below, support for their activities as a Member, or for candidacy at an election for parliamentary or non-parliamentary office, which has a value of more than £1,500, either as a single donation or in multiple donations of more than £500 from the same source in a calendar year.

25 Requirements for registration under Category 2(a) and 2(b)

15. This category has two parts:

....

30 Category 2(b): any other support received by a Member. This includes support received indirectly, for example via a political club. Before accepting any donations registrable under this category, Members must check that they are from a permissible donor. Under the Political Parties, Elections and Referendums Act, Members must not accept impermissible donations and must notify the Electoral Commission within 30 days of receipt.

16. Under this category Members must register:

....

- 5 c) Support in kind, including any of the following, if provided either free or at concessionary rates: advice or information services; receptions and events; training or development for the Member or his or her staff; the services of staff or interns; the provision of office space or equipment; hospitality or travel benefits such as season tickets or parking;

Category 3: Gifts, benefits and hospitality from UK sources

10 Legal funds

29. Members should normally register under this category contributions to legal funds (including in-kind contributions). This would apply if, for example, the legal action arose out of activity as a Member of Parliament but the donation was not specifically in support of the Member's activities as a Member of Parliament."

15

Next steps

In order for me to progress my inquiry, I require the following from you:

1. Write to me immediately in confidence if you are not currently well enough to participate in my inquiry. If you need to write to me about your wellbeing, please ensure you outline the nature of your current health issues and if you are currently receiving medical care. This correspondence will not form part of the information published at the end of my inquiry but will enable me to decide whether to suspend my inquiry or to make adjustments to enable your participation. If your health and wellbeing changes during my inquiry, please let me know at that time.
 2. Ensure that you understand what I will be investigating. If you do not understand, please let me know immediately.
 3. Read carefully the appendices attached to this letter. If you have any questions about the content of those appendices, please let me or a member of my team know as soon as possible.
 4. Reply to this letter by 2 May 2025 with:
 - a) Your general comments on the allegation that your alleged actions have amounted to a breach of Rule 5 of the Code of Conduct for Members.
- 20
- 25
- 30

- b) Your answers to the following specific questions. Please submit any relevant evidence to support your responses when you reply to this letter.

5 Question 1: Do you accept that the legal advice received from Mr Day and Marriott Harrison, was registered outside the 28-day window set by the House? If you do accept this, please can you outline the circumstances that led to the late registration of these interests. If you do not accept that these interests were registered outside the 28-day window set by the House, please explain your reasoning.

10 Question 2: Are you otherwise satisfied that your entry in the Register of Members' Financial Interests is complete and accurate and in line with the requirements of Chapter 1 of the Guide to the Rules?

- i) If it is not, please inform me of any omissions or errors and contact the Registrar to bring it up to date.
- 15 ii) If it is, please tell me the steps you have taken to satisfy yourself of this.

- c) Any other points you wish to make to help me with my inquiry.

5. If you would like to request a meeting under paragraph 35 of the Procedural Protocol, please let me know by return.

Important information

20 Attached to this letter are several appendices which provide important information on:

- Appendix 1: Support for you.
- Appendix 2: Confidentiality.
- Appendix 3: How my investigations are conducted.
- 25 • Appendix 4: Possible outcomes from my inquiry.

Contact details

If you would prefer me to communicate with you by a different email address, please give the details when you reply to this letter. I would be grateful if you could send your response electronically to standardscommissioner@parliament.uk

30 Thank you for your cooperation with this matter.

22 April 2025

9. Email from Charlie Maynard MP to the Commissioner, 30 April 2025

Thank you for your letter of 22nd April, informing me that you are planning to open an investigation into my not having registered the pro bono legal advice I received from William Day and Marriott Harrison within the 28-day deadline.

I would like to be very clear from the outset that I accept that the pro bono legal support I received both exceeded the threshold for registration for 'Donations and other support'; and would qualify as "advice or information services" as per section 16 (c) of the guide to the conduct of Members, which is appended to the Code.

My failure to declare this within the necessary timeframe was a very regrettable mistake on my part. It simply had not occurred to me that I needed to do so. It was in no way an attempt to hide the fact that I was receiving this pro bono legal advice.

From the start I have been clear about the fact I received this support for the Thames Water court hearing and that this advice was provided to me for free. I wrote to you on January 16, 2025 to notify you of the fact that I was seeking to act as an "intervener" in the proceedings and stated at that point that I would be working with pro-bono legal representatives. I have also been clear about this in conversations with journalists (for example: [Feeding frenzy: how army of advisers is making millions from Thames Water | Thames Water | The Guardian](#)). Campaigners who have been supporting me in this work are also aware of this fact and have written publicly about it (for example: [Windrush Against Sewage Pollution blog post: High Court - it's happening](#)).

To answer your specific questions:

Question 1: Do you accept that the legal advice received from Mr Day and Marriott Harrison, was registered outside the 28-day window set by the House? Yes, I do. The circumstances are simply that it had not occurred to me that this pro-bono advice would need to be registered and therefore I had not requested from either legal party what was the monetary value of the advice that they were providing. As soon as this fact was drawn to my attention, by an article published on 14th March, I wrote to you straight away to bring this to your attention and I also wrote the same day to the Registrar of Interests to request an update of my register.

Question 2: Are you otherwise satisfied that your entry in the Register of Members' Financial Interests is complete and accurate and in line with the requirements of Chapter 1 of the Guide to the Rules? Yes, I am otherwise satisfied that my entry in the Register of Members' Financial Interests is complete and accurate. I will ensure that all further legal advice received from William Day and Marriott Harrison is recorded within the 28 day deadline.

In terms of any other comments, I would like to apologise. I completely accept that I made an inadvertent mistake and that the mistake is mine.

I would like to take you up on your offer of a meeting. I am keen to work with you to reach a conclusion on this matter as soon as professionally possible.

5 30 April 2025

10. Letter from the Commissioner to Charlie Maynard MP, 2 May 2025

Thank you for your email of 30 April 2025, and the additional information you have provided.

10 Having considered the evidence carefully, I now have sufficient information to consider whether there has been a breach of the Code of Conduct, in respect of the allegation that you did not register the pro bono legal advice that you received from Mr William Day and Marriott Harrison within the 28-day deadline set by the House.

My decision

15 I have considered our correspondence and the published rules. I consider that the interests were registrable and that by not registering them within the 28-day time limit set by the House you breached Rule 5 of the Code of Conduct. However, for the reasons outlined below, I do not intend to refer this matter to the Committee on Standards. Instead, I have decided this matter is suitable for the rectification process provided by Standing Order No. 150.

20 Reasoning

The overarching rules are found in the House of Commons' Code of Conduct for Members. Rule 5 of the Code states:

25 *Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days.*

30 The Guide to the Rules contains more detail about the registration of interests.

Chapter 1, paragraph 2 states:

The House therefore 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.

Chapter 1, paragraphs 15 and 16 state:

Category 2(b): [Members must register under this category] any other support received by a Member. This includes support received indirectly, for example via a political club...

16. Under this category Members must register:

...

c) Support in kind, including any of the following, if provided either free or at concessionary rates: advice or information services; receptions and events; training or development for the Member or his or her staff; the services of staff or interns; the provision of office space or equipment; hospitality or travel benefits such as season tickets or parking;

In your email of 14 March 2025, you stated it had been brought to your attention by a journalist that you should have included pro-bono legal advice you had received in your entries in the Register of Members' Financial Interests. This advice was to support you in a court hearing in which you were appearing as intervener. You told me you had not appreciated until that point that you needed to register this advice. You have explained that you formally engaged Marriott Harrison on 20 January 2025, and that the value of this legal support was £235,000. You confirmed that you started receiving legal support from Mr William Day from 27 December 2024 and that its value was £242,500. You accepted that the value of the legal support you received exceeded the threshold for registration for 'Donations and other support'; and would qualify as "advice or information services" as specified in section 16(c) of the Guide.

You have accepted that these interests were not registered within the 28-day time-limit set by the House, apologised and explained that the delay arose because it had not occurred to you that this pro bono advice would need to be registered. You have confirmed that you are satisfied that your register entry is otherwise up to date.

When a breach of the rules has occurred, in certain circumstances Standing Order No. 150 allows me to offer the Member the chance to rectify their breach. One of

those circumstances is if “...the Member concerned has agreed that he has failed to register or declare an interest...(and) it is the Commissioner’s opinion that the...failure was inadvertent”. Given your explanation, I am satisfied that the failure to register these interests on time was inadvertent.

5 Next Steps

As I explained above, Standing Order No. 150 makes provision for me to conclude an inquiry using the rectification process, rather than by making a referral to the Committee on Standards. The Committee would generally expect the Member to have acknowledged and apologised for their breach of the rules, and to have taken any steps necessary to rectify their breach. You have already acknowledged and apologised for your breach of the rules. Therefore, in order to use the rectification process to conclude this inquiry, I will require the following from you:

- a) Confirmation that you have read and accepted my decision.
- b) An explanation of what steps you intend to take to ensure that future interests will be registered in line with the House’s requirements.
- c) Confirmation that your entry on the Register has now been updated to include these interests.

If you are content for me to conclude the inquiry in this way, please write to me with the above information by 9 May 2025.

(In cases concerning the registration of interests, I also ask the Registrar to arrange for the relevant entry to be italicised in the Register of Members’ Financial Interests to indicate to the reader that entry has been the subject of an inquiry and rectification process.)

If you agree to my proposal, I will share my draft written evidence pack with you in due course, so that you can check its factual accuracy before publication. I will also report the outcome of the inquiry at its close to the Committee on Standards as a matter of routine.

If you do not accept my opinion, you should tell me the reasons for that by reply. After which, I will prepare a memorandum to the Committee on Standards, so that they may consider the matter. I would give you the opportunity to see and comment on a draft of the memorandum, but the content of it would, in the final analysis, be for me alone.

In the meantime, our correspondence remains protected by parliamentary privilege, and I must ask that you continue to maintain the strict confidentiality of the inquiry.

In your email to me of 30 April you request a meeting to discuss this matter. As this is a current investigation, you are entitled to request a meeting in accordance with paragraph 35 of the Procedural Protocol in respect of the Code of Conduct. It may be that the terms of this letter will have obviated the necessity for a meeting, but if you would still like to meet please let me know.

2 May 2025

11. Email from Charlie Maynard MP to the Commissioner, 9 May 2025

Thank you very much for your letter, outlining that you are minded to conclude your inquiry using the rectification process rather than making a referral to the Committee on Standards. I'm very grateful for your consideration of the issue.

I am writing to confirm, as requested, that:

- a) I have read and accept your decision.
- b) I will ensure any future interests are registered in line with requirements. In order to do so, I will review the value of any further gifts or benefits (including of course, further legal advice) and make updates to my register in good time, well within the 28-day window.
- c) I have now updated entries to the register which reflect all of the pro bono legal advice I have received. I understand from contacting the registrar's office that they should be included in the next version of the register which is due to be published early next week. This will then bring my entry in the register of interests up to date – and I will ensure it continues to be.

In light of your letter I agree we do not need a meeting at this point. However, I am of course very happy to meet now, or at any point in future, if you would like to discuss this further, or need me to provide any further clarification. Thank you again for your help in resolving this matter.

9 May 2025

12. Letter from the Commissioner to Charlie Maynard MP, 21 May 2025

Thank you for your email of 9 May 2025 accepting my offer to rectify your breach of Rule 5 of the Code of Conduct and informing me that:

"I have now updated entries to the register which reflect all of the pro bono legal advice I have received. I understand from contacting the registrar's office that they should be included in the next version of the register which is due to be published early next week. This will then

bring my entry in the register of interests up to date – and I will ensure it continues to be”.

I have reviewed the Register and identified that, in addition to the two interests that you had previously identified, the following interests appear to have been added or updated:

1. Employment and earnings

Role, work or services: District Councillor

Until: 13 March 2025.

Payer: West Oxfordshire District Council (District Council), Wood Green, Witney, Oxon, OX28 1NB

(Registered 1 August 2024; updated 9 May 2025)

3. Gifts, benefits and hospitality from UK sources

Name of donor: Riz Mokal

Address of donor: private

Amount of donation or nature and value if donation in kind: Pro Bono Legal Advice, value £79,560

Date received: 1 March 2025 to 1 May 2025

Date accepted: 1 March 2025

Donor status: individual

(Registered 7 May 2025)

Name of donor: Rabin Kok

Address of donor: private

Amount of donation or nature and value if donation in kind: Pro bono legal advice, value £29,160

Date received: 1 March 2025 to 1 May 2025

Date accepted: 1 March 2025

Donor status: individual

(Registered 7 May 2025)

Name of donor: Lucas Jones

5 *Address of donor: private*

Amount of donation or nature and value if donation in kind: Pro bono legal advice, value £27,300

Date received: 27 December 2024 to 1 May 2025

Date accepted: 27 December 2024

10 *Donor status: individual*

(Registered 7 May 2025)

Name of donor: Marriott Harrison

Address of donor: 80 Cheapside, London, England EC2V 6EE

15 *Amount of donation or nature and value if donation in kind: Pro bono legal advice, value £17,824.80*

Date received: 10 April 2025 to 7 May 2025

Date accepted: 10 April 2025

Donor status: company, registration OC372774

(Registered 9 May 2025)

20 In my initiation letter to you of 22 April 2025 I asked whether you were satisfied your entry in the Register of Members' Financial Interests was complete. You replied on 30 April 2025:

25 *"Yes, I am otherwise satisfied that my entry in the Register of Members' Financial Interests is complete and accurate. I will ensure that all further legal advice received from William Day and Marriott Harrison is recorded within the 28-day deadline."*

It appears from the information set out above that the assertion that your entry was complete may have been inaccurate.

My decision to exercise my power to rectify the breach of the Code under Standing Order No. 150 was based on the information that you provided in your emails of 14, 20 and 27 March 2025 and 30 April 2025. This included the assurance in your email of 30 April 2025 that your Register entry was complete and accurate. In view of the additional information that is now available to me, I must consider whether the rectification process remains the most appropriate resolution. In order to do this, I must extend the scope of my inquiry.

10 The extended scope of my inquiry

In addition to the inquiry into the late registration of the pro bono advice from Marriott Harrison and William Day, I will consider whether:

1. you failed to register the pro bono advice that you received from Riz Mokal, Rabin Kok, Lucas Jones as well as a further donation from Marriott Harrison within the 28-day time limit set by the House; and
2. you failed to update the register to show the cessation of your role as District Councillor for West Oxfordshire District Council within the 28-day time frame set by the House.

Further, as a result of what may have been an inaccurate assurance in your email to me of 30 April 2025 that your Register entry was accurate and complete, I consider it appropriate to extend my investigation to include a potential breach by you of Rule 12 of the Code of Conduct, which requires you to co-operate with my investigations.

My inquiries

As I have previously explained, although I have decided to extend this formal inquiry, this does not mean that I have formed a view on whether a breach of the House's rules has occurred. My investigations are inquisitorial, and I will seek to establish the facts in a fair, independent, and thorough manner, taking evidence from you, and any other sources as necessary, before reaching a conclusion on the balance of probabilities.

How I conduct my inquiries is laid out in the Procedural Protocol in respect of the Code of Conduct, which was drafted by the Committee on Standards and has been approved by the House.

At the conclusion of my investigation, I will reach an opinion on both the facts of what has happened and whether those facts amount to a breach of Rule 5 and / or Rule 12 of the Code of Conduct, and I will use the balance of probabilities to form that opinion.

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

The relevant rules of the House

The overarching rules are found in the House of Commons' Code of Conduct for Members.

5 Rule 5 of the Code states:

10 *"Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days."*

Rule 12 of the Code states:

15 *"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."*

The Guide to the Rules, which is appended to the Code, contains more detail about the registration of financial interests. Chapter 1, states:

20 *"2. The House therefore 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*
 25 *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.*

....

30 **Category 2: Donations and other support for activities as a Member of Parliament**

Threshold for registration

14. Members must register, subject to the paragraphs below, support for their activities as a Member, or for candidacy at an election for parliamentary or non-parliamentary office, which has a value of more

than £1,500, either as a single donation or in multiple donations of more than £500 from the same source in a calendar year.

16. Under this category Members must register:

....

5 *c) Support in kind, including any of the following, if provided either free or at concessionary rates: advice or information services; receptions and events; training or development for the Member or his or her staff; the services of staff or interns; the provision of office space or equipment; hospitality or travel benefits such as season tickets or*
10 *parking;*

....

Category 3: Gifts, benefits and hospitality from UK sources

....

Legal funds

15 *29. Members should normally register under this category contributions to legal funds (including in-kind contributions). This would apply if, for example, the legal action arose out of activity as a Member of Parliament but the donation was not specifically in support of the Member's activities as a Member of Parliament*

20 *Category 8: Miscellaneous*

Requirements for registration

54. Under this category Members must register:

...

25 *c) Funds established to defray legal costs arising out of the Member's work, including 'crowdfunded' legal funds for action to which the Member is a party, including stating what (if any) benefit has been received by the Member;*

30 *d) Any relevant financial interest or material benefit which does not clearly fall into one of the other categories, including any shareholding which falls below the relevant threshold, or any other financial asset, including an asset held in trust, if this meets the test of relevance; in*

other words, that it might reasonably be thought by others to influence a Member's actions or words as a Member;"

Next steps

To assist me with my consideration of this matter, I require the following from you:

- 5 1. Write to me immediately in confidence if you are not currently well enough to participate in my inquiry. If you need to write to me about your wellbeing, please ensure you outline the nature of your current health issues and if you are currently receiving medical care. This correspondence will not form part of the information published at the end of my inquiry but will enable me to
10 decide whether to suspend my inquiry or to make adjustments to enable your participation. If your health and wellbeing changes during my inquiry, please let me know at that time.
2. Ensure that you understand the scope of my extended investigation. If you do not understand, please let me know immediately.
- 15 3. Review the appendices attached to my letter dated 22 April 2025. If you no longer have access to those appendices or have any questions about their content, please let me or a member of my team know as soon as possible.
4. Reply to this letter with:
 - 20 a) Your general comments on the allegation that your alleged actions have resulted in further breaches of Rule 5 of the Code of Conduct for Members.
 - b) Your general comments on the allegation that you provided incorrect information to me on 30 April 2025 regarding the status of your Register entry, contrary to Rule 12 of the Code of Conduct for Members.
 - 25 c) Your answers to the following specific questions. Please submit any relevant evidence to support your responses when you reply to this letter.

30 Question 1: Do you accept that on 30 April 2025, you provided incorrect information regarding the status of your Register entry when you responded to my inquiries stating "Yes, I am otherwise satisfied that my entry in the Register of Members' Financial Interests is complete and accurate." If you do accept this, please can you outline the circumstances that led to you making this statement. If you do not accept this, please explain your reasoning.

35 Question 2: Do you accept that you have not registered the pro bono advice from Riz Mokal, Rabin Kok, Lucas Jones and the most recent advice from Marriott Harrison within the 28-day time limit set by the House? If you do

accept this, please can you outline the circumstances that led to the late registration of these interests. If you do not accept this, please explain your reasoning.

5 Question 3: Do you accept that you have not amended the register to reflect the cessation in your role as District Councillor for West Oxfordshire District Council within the 28-day time limit set by the House? If you do accept this, please can you outline the circumstances that led to the late registration of the termination of this interest.

Question 4: Please confirm that your Register entry is up to date.

10 d) Any other points you wish to make to help me with my inquiry.

5. As I am extending this inquiry, I remind you that if you would like to request a meeting under paragraph 35 of the Procedural Protocol, please let me know by return.

15 Please could you reply by 5 June 2025. In the meantime, our correspondence remains protected by parliamentary privilege, and I must ask that you continue to maintain the strict confidentiality of the inquiry.

21 May 2025

13. Email from Charlie Maynard MP to the Commissioner, 28 May 2025

Thank you for your letter of 21st May.

20 I understand why the additional changes to my register of interests have raised questions. I will try here to explain how these have arisen in order to assist with your extended inquiries. I would also like to take you up on the offer of an in-person meeting to discuss these points further, as helpful.

25 **General comments on the allegation that your alleged actions have resulted in further breaches of Rule 5 of the Code of Conduct for Members:**

Yes, I accept that I further breached Rule 5 of the Code, in terms of registering additional legal support after the 28 day deadline and failing to register the fact I had stepped down from West Oxfordshire District Council within the same deadline.

30 I will outline how each of these errors arose in more detail below. However, I would like to emphasise upfront that these were, as with my original breach of the code, due to mistakes on my part, rather than an attempt to deliberately disguise these interests.

General comments on the allegation that you provided incorrect information to me on 30 April 2025: I accept that this was the case for the reasons outlined below, although this was unintentional.

Question 1: Do you accept that on 30 April 2025, you provided incorrect information regarding the status of your Register entry when you responded to my inquiries stating “Yes, I am otherwise satisfied that my entry in the Register of Members’ Financial Interests is complete and accurate.”

Yes I accept this. To explain why these additional late entries to the register occurred:

10 Riz Mokal, Rabin Kok and Lucas Jones are barristers who have supported William Day and Marriott Harrison with the Thames Water legal proceedings I have been involved with. They became involved through William Day, who brought them onto the team during the course of the preparation for the case in order to support his work. All of this work is being done pro bono and at no point did I formally engage
15 any of them to work on my behalf or sign any form of contract. The only formal engagement I have in place now, or previously, is with Marriott Harrison who in turn has instructed the barristers.

20 Due to my own misunderstanding about the structure of the legal team, I believed that the estimate of the value of time spent on the case that William Day originally provided included the value of Riz’s, Rabin’s and Lucas’s time too. It was only when William asked if I needed full details of all legal counsel’s time in order to update the register after your original inquiry, that I realised that each of the barristers charge for their time separately and in some cases work in different chambers. When these facts became clear, I updated my register of interests to reflect this. I am reliant on
25 the goodwill of each of these parties to provide information on their working hours to me within the time period. Given they are all working pro bono and are busy, I don’t have 100% control over what information I receive when, but we have now made clear our timeline commitments to each of them and are assiduously following up to receive the data. As soon as we receive it, I register it.

30 I accept that my failure to record these pro-bono values was a failure on my part. However, this was on account of an inadvertent error in my understanding rather than a deliberate attempt to hide the fact I had received their support. No financial costs have actually been incurred, with all of the work being provided on a pro bono basis. Until your initial inquiries, I had no conversations with the legal team about
35 what their time would typically cost and no formal paperwork or contracts have changed hands, save for the contract with Marriott Harrison mentioned above.

I also accept that I missed the deadline for making the second entry for advice from Marriott Harrison by three days. In this case I missed the deadline due to other workload pressures and apologise for this oversight.

I further accept that I failed to register my role as a District Councillor coming to an end within the 28 day deadline. I expand on that point in response to Question 3 below.

Question 2: Do you accept that you have not registered the pro bono advice from Riz Mokal, Rabin Kok, Lucas Jones and the most recent advice from Marriott Harrison within the 28-day time limit set by the House? Yes, I accept this. In relation to the advice received by Riz Mokal, Rabin Kok and Lucas Jones, as outlined above, this was due to a misunderstanding on my part about the structure of the legal team, and that they were not all included within the one 'bill' that I had registered from William Day. In the case of the delay in registering the second batch of advice from Marriott Harrison, this was due to an oversight which meant I missed the deadline.

Question 3: Do you accept that you have not amended the register to reflect the cessation in your role as District Councillor for West Oxfordshire District Council within the 28-day time limit set by the House? Yes, I do accept this oversight on my part. I had not remembered that an interest coming to an end had to be updated in my register of interests. It was only when I was updating the register in line with your initial inquiry that it was drawn to my attention. That said, I completely accept that the rules are clear in this matter. I would also add that I have been very public about the fact that I was stepping down from the District Council in my local press and social media etc., so I have in no way sought to hide the fact that I no longer hold this role.

Question 4: Please confirm that your Register entry is up to date. Yes, it is now up to date.

28 May 2025

14. Email from Charlie Maynard MP to the Registrar of Members' Financial Interests (copied to the Office of the Parliamentary Commissioner for Standards), 2 June 2025

[name redacted] forwarded on your email below to me. My sister-in-law has let me stay in her apartment in London since I was elected in July 2024. She has never rented it out so we don't have an exact rental value, but I will now work on getting an estimate from a professional third party.

One further point, my sister-in-law is a Dutch national, working and living in the UK. Should this be registered as a Category 3 or Category 5 interest?

I am copying in [Name redacted] here as I am keen that the Standards Commissioner is aware of this issue while we are working out the exact registration. As soon as these points are settled, I will register it.

Kind regards,

Charlie

From: Commons Registrar
Sent: Friday, May 30, 2025 15:20
To: [Name redacted]
5 Subject: RE: Register inquiry
Dear [name redacted],

If this is a long-term arrangement, and the use of the apartment is being provided free of charge, it will require registration under Category 3: Gifts, benefits and hospitality from UK sources.

- 10 The threshold for this category is a value of over £300 in a calendar year. If you cannot get a value, you are able to use an estimate. I have attached the Commissioner's Advice Note on Estimates which may be helpful.

Regards,

[Name redacted]

- 15 *2 June 2025*

15. Letter from the Commissioner to Charlie Maynard MP, 10 June 2025

Thank you for your email of 28 May 2025 accepting my offer to rectify your breach of Rule 5 of the Code of Conduct and informing me that your Register entry "is now up to date".

- 20 However, I note that in an email to the Registrar copied to my office received 2 June 2025, you stated that:

- 25 *"My sister-in-law has let me stay in her apartment in London since I was elected in July 2024. She has never rented it out so we don't have an exact rental value, but I will now work on getting an estimate from a professional third party."*

One further point, my sister-in-law is a Dutch national, working and living in the UK. Should this be registered as a Category 3 or Category 5 interest?

- 30 *I am copying in [name redacted] here as I am keen that the Standards Commissioner is aware of this issue while we are working out the exact registration. As soon as these points are settled, I will register it."*

As I explained in my letter dated 21 May 2025, on 30 April 2025, you inaccurately informed me that:

“Yes, I am otherwise satisfied that my entry in the Register of Members’ Financial Interests is complete and accurate. I will ensure that all further legal advice received from William Day and Marriott Harrison is recorded within the 28-day deadline.”

- 5 You repeated that assertion to me on 28 May 2025 when asked to confirm that your Register entry was up to date you stated “Yes, it is now up to date.”

As I previously explained, my decision to exercise my power to rectify the breach of the Code under Standing Order No. 150 was based on the information that you provided in your emails of 14, 20 and 27 March 2025 and 30 April 2025. This
10 included the assurance in your email of 30 April 2025 that your Register entry was complete and accurate. In view of this further information that is now available to me, I must consider whether the rectification process remains the most appropriate resolution. In order to do this, I must extend the scope of my inquiry further.

The extended scope of my inquiry

15 In addition to the inquiry into the late registration of the pro bono advice set out in my letters of 22 April 2025 and 20 May 2025, and the failure to register the cessation of your role as District Councillor for West Oxfordshire District Council, as set out in my letter dated 20 May 2025, I will consider whether:

- 20 1. You failed to register the provision of accommodation in London that you have been using since your election in July 2024, within the 28-day time frame set by the House.
2. In your email of 28 May 2025, you incorrectly stated that your Register entry was accurate and complete.

My inquiries

25 As I have previously explained, although I have decided to extend this formal inquiry, this does not mean that I have formed a view on whether a breach of the House’s rules has occurred. My investigations are inquisitorial, and I will seek to establish the facts in a fair, independent, and thorough manner, taking evidence from you, and any other sources as necessary, before reaching a conclusion on the
30 balance of probabilities.

How I conduct my inquiries is laid out in the Procedural Protocol in respect of the Code of Conduct, which was drafted by the Committee on Standards and has been approved by the House.

35 At the conclusion of my investigation, I will reach an opinion on both the facts of what has happened and whether those facts amount to a breach of Rule 5 and / or

Rule 12 of the Code of Conduct, and I will use the balance of probabilities to form that opinion.

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

The relevant rules of the House

- 5 The overarching rules are found in the House of Commons' Code of Conduct for Members.

Rule 5 of the Code states:

10 *"Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days."*

- 15 Rule 12 of the Code 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."

- 20 The Guide to the Rules, which is appended to the Code, contains more detail about the registration of financial interests. Chapter 1, states:

25 *"2. The House therefore 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."*

30

Category 3: Gifts, benefits and hospitality from UK sources

Threshold for registration

21. Members must register, subject to the paragraphs below, any gifts, benefits or hospitality with a value of over £300 which they receive from a UK source. They must also register multiple benefits from the same source if these have a value of more than £300 in a calendar year.

5 *Requirements for registration*

22. Under this category Members must register: Any benefits which relate in any way to their membership of the House or political activities, if provided by a UK source either free or at concessionary rates, including:

10 ...

b) hospitality in the UK, including receptions, meals and accommodation;

....

Category 5: Gifts and benefits from sources outside the UK

15 *Threshold for registration*

38. Members must register, subject to the paragraphs below, any gifts or benefits with a value of over £300 which they receive from a source outside the UK. They must also register multiple benefits from the same source if taken together these have a value of more than £300 in a calendar year.

20

Requirements for Registration

39. Under this category Members must register:

Any benefits which relate in any way to their membership of the House or parliamentary or political activities, if provided by a source outside the UK either free or at concessionary rates, including:

25

...

b) hospitality in the UK, including receptions, meals and accommodation;”

Next steps

30 To assist me with my consideration of this matter, I require the following from you:

1. Write to me immediately in confidence if you are not currently well enough to participate in my inquiry. If you need to write to me about your wellbeing, please ensure you outline the nature of your current health issues and if you are currently receiving medical care. This correspondence will not form part of the information published at the end of my inquiry but will enable me to decide whether to suspend my inquiry or to make adjustments to enable your participation. If your health and wellbeing changes during my inquiry, please let me know at that time.
2. Ensure that you understand the scope of my extended investigation. If you do not understand, please let me know immediately.
3. Review the appendices attached to my letter dated 22 April 2025. If you no longer have access to those appendices or have any questions about their content, please let me or a member of my team know as soon as possible.
4. Reply to this letter with:
 - a) Your general comments on the allegation that your alleged actions have resulted in further breaches of Rule 5 of the Code of Conduct for Members.
 - b) Your general comments on the allegation that you provided incorrect information to me on 30 April and 28 May 2025 regarding the status of your Register entry in respect of this interest, contrary to Rule 12 of the Code of Conduct for Members.
 - c) Your answers to the following specific questions. Please submit any relevant evidence to support your responses when you reply to this letter.

Question 1: Do you accept that on 28 May 2025 you provided incorrect information regarding the status of your Register entry when you responded to my inquiries stating “Yes, it is now up to date.” If you do accept this, please can you outline the circumstances that led to you making this statement. If you do not accept this, please explain your reasoning.

Question 2: Do you accept that you have not registered the provision of accommodation in London that is provided by your sister in law within the 28-day time limit set by the House? If you do accept this, please can you outline the circumstances that led to the late registration of these interests. If you do not accept this, please explain your reasoning.

Question 3: Please confirm that your Register entry is up to date.
 - d) Any other points you wish to make to help me with my inquiry.

5. As I am extending this inquiry, I remind you that if you would like to request a meeting under paragraph 35 of the Procedural Protocol, please let me know by return.

5 Please could you reply by 24 June 2025. In the meantime, our correspondence remains protected by parliamentary privilege, and I must ask that you continue to maintain the strict confidentiality of the inquiry.

10 June 2025

16. Email from Charlie Maynard MP to the Commissioner, 18 June 2025

10 Thank you for your letter to me of 10th June regarding my failure to register that I have stayed in my sister-in-law's flat, without being charged rent, within the 28-day deadline of this arrangement commencing.

As requested, please find below my response to your specific queries:

General comments on the allegation that this amounts to further breaches of Rule 5 of the Code of Conduct for Members: I accept this was a breach. This was
15 an informal arrangement with a family member, with no money involved, no formal contract, and no discussion at any point of what the equivalent monetary value of the flat would be. As such, it simply had not occurred to me that this was something I needed to register. It was when I was prompted to think more closely about my
20 entry to the register, in response to your earlier inquiries, that I realised this would qualify as a registrable benefit (as with the pro bono legal advice I have been receiving).

General comments on the allegation that I previously provided incorrect information to you about my Register of Interests being up to date: Yes I accept
25 this was incorrect. At the time of my last letter to you I had not thought about the fact that my sisters-in-law's flat would qualify as a registrable benefit, in the same way as pro bono legal advice. This was simply because it was a very informal arrangement with a family member.

1. **Do you accept you provided incorrect information on the status of your register entry:** I accept that it was incorrect for me to state in my previous
30 correspondence to you that my register of interests was up to date, when I had not yet registered this accommodation.

2. **Do you accept that you have not registered the provision of accommodation within the 28-day time limit:** I accept that the failure to
35 register this accommodation, which I am being allowed to stay in free of charge by a family member, amounts to a breach of Rule 5. I accept that this is a registrable benefit, as set out in the Guide to the Rules (Category 3, paragraph 22). This is hospitality which relates to my membership of the House as I stay in the flat during the days I am working late in Westminster.

3. **Please confirm that your Register entry is up to date.** I have one more historical entry which I wish to put on the register. I no longer own shares in the company, but I want to declare the situation all the same. When becoming an MP I forgot to register some shares I held in a private company called 315 Holding Company Pte Ltd (Nhi Dong 315) which manages a chain of health clinics in Vietnam. I received US\$159,418.94 on the 14th February 2025 (£126,865.59 equivalent at that day's exchange rate). The buyer of my shares in the company was the CEO of the company, Ms. Vy Van Huynh Nguyen.

Any other points you wish to make:

- 10 Regarding staying in my sister-in-law's flat: as above, I accept that it was an error on my part both not to register my accommodation at my sister-in-law's flat immediately and when I last wrote to you. This was and remains a completely informal arrangement with a family member. This gift was not given to influence my work as an MP in any way. My sister-in-law teaches economics and finance at [Redacted], but is not involved politically. I entered into this arrangement partly to avoid the cost to the taxpayer of renting a London property. As soon as I realised this would amount to a breach of the rules I proactively brought it to your attention.

- Regarding my prior stake in 315 Holding Company: I am completely distraught at finding yet another item that I have not declared but should have. Plenty of sleepless nights as a result. This failure is down to my own incompetency and distraction rather than design. By way of background, I previously founded and ran an Asia focussed Mergers & Acquisitions firm and a few years back there was an opportunity to invest in two Vietnamese companies. In one company I lost almost everything I invested. I continue to own shares in that company but their value is far below the parliamentary declaration threshold. Regarding 315, I never played any role in either the management or governance and my ownership stake was a long way below 5%. I should have remembered my investment in 315 when registering my interests but didn't. I have had no involvement in parliament for anything Vietnam-related during the period I held the shares. This continues to be the case, though I did attend a Vietnam-UK dinner held in the House of Lords last week, but this was several months after my interest in this company had ceased having sold the shares in February.

- Once again, I would like to apologise for these recent mistakes in relation to my entry in the Register. I am very willing to meet and talk these through face to face so you can put any further questions to me about this.

18 June 2025

17. Letter from the Commissioner to Charlie Maynard MP, 23 June 2025

Thank you for your email of 18 June 2025 in which you provided the additional information requested in relation to the use of your sister-in-law's London flat.

In your email you also provided additional information relating to shareholdings held by you in two Vietnamese companies. You said that whilst you continued to hold shares in one of the companies (unnamed), you sold the shares in 315 Holding Company PTE Ltd (Nhi Dong 315) on 14 February 2025.

- 5 These are further interests that you have not registered despite stating 30 April 2025 that:

10 *“Yes, I am otherwise satisfied that my entry in the Register of Members’ Financial Interests is complete and accurate. I will ensure that all further legal advice received from William Day and Marriott Harrison is recorded within the 28-day deadline.”*

You repeated that assertion to me on 28 May 2025 when asked to confirm that your Register entry was up to date by replying *“Yes, it is now up to date.”*

15 As I previously explained, my decision to exercise my power to rectify the breach of the Code under Standing Order No. 150 was based on the information that you provided in your emails of 14, 20 and 27 March 2025 and 30 April 2025. This included the assurance in your email of 30 April 2025 that your Register entry was complete and accurate. In view of this further information that is now available to me, I must consider whether the rectification process remains the most appropriate resolution. In order to do this, I must extend the scope of my inquiry again.

20 **The extended scope of my inquiry**

The inquiry previously aimed to consider:

- the late registration of the pro bono advice as set out in my letters of 22 April 2025 and 20 May 2025 (Rule 5);
- 25 • the failure to register the cessation of your role as District Councillor for West Oxfordshire District Council, as set out in my letter dated 20 May 2025 (Rule 5);
- the failure to register the use of the London flat as set out in my letter of 10 June 2025 (Rule 5); and
- 30 • whether you have failed to fully co-operate with my inquiry by stating on multiple occasions that your Register entry was accurate and complete (Rule 12),

I will now also consider whether:

1. You failed to register shareholdings in two Vietnamese companies, within the 28-day time frame set by the House.

2. You have failed to co-operate with my inquiries by stating on multiple occasions that your Register entry was accurate and complete despite not registering your shareholdings.

My inquiries

- 5 As I have previously explained, although I have decided to extend this formal inquiry, this does not mean that I have formed a view on whether a breach of the House's rules has occurred. My investigations are inquisitorial, and I will seek to establish the facts in a fair, independent, and thorough manner, taking evidence from you, and any other sources as necessary, before reaching a conclusion on the
10 balance of probabilities.

How I conduct my inquiries is laid out in the Procedural Protocol in respect of the Code of Conduct, which was drafted by the Committee on Standards and has been approved by the House.

- 15 At the conclusion of my investigation, I will reach an opinion on both the facts of what has happened and whether those facts amount to a breach of Rule 5 and / or Rule 12 of the Code of Conduct, and I will use the balance of probabilities to form that opinion.

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

The relevant rules of the House

- 20 The overarching rules are found in the House of Commons' Code of Conduct for Members.

Rule 5 of the Code states:

- 25 *"Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days."*

- 30 Rule 12 of the Code 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."

The Guide to the Rules, which is appended to the Code, contains more detail about the registration of financial interests. Chapter 1, states:

“2. The House therefore 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.

....

Category 7: Shareholdings

Threshold for registration

50. Members must register, subject to the paragraphs below, any holdings which:

i) amount to more than 15% of the issued share capital of that company, or more than 15% of a partnership;

ii) are valued at more than £70,000.⁴² Requirements for registration

51. Under this category Members must register:

a) Shareholdings or share options which they hold, either by themselves or with or on behalf of their spouse, partner or dependent children. This includes any shares which are managed by a trust (other than a blind trust or similar delegated management arrangement) and any holdings in sector-specific vehicles;

....

Category 8: Miscellaneous

Requirements for registration

54. Under this category Members must register:

....

- 5 *d) Any relevant financial interest or material benefit which does not clearly fall into one of the other categories, including any shareholding which falls below the relevant threshold, or any other financial asset, including an asset held in trust, if this meets the test of relevance; in other words, that it might reasonably be thought by others to influence a Member's actions or words as a Member;"*

Next steps

To assist me with my consideration of this matter, I require the following from you:

- 10 1. Write to me immediately in confidence if you are not currently well enough to participate in my inquiry. If you need to write to me about your wellbeing, please ensure you outline the nature of your current health issues and if you are currently receiving medical care. This correspondence will not form part of the information published at the end of my inquiry but will enable me to decide whether to suspend my inquiry or to make adjustments to enable your participation. If your health and wellbeing changes during my inquiry, please let me know at that time.
- 15
2. Ensure that you understand the scope of my extended investigation. If you do not understand, please let me know immediately.
- 20 3. Review the appendices attached to my letter dated 22 April 2025. If you no longer have access to those appendices or have any questions about their content, please let me or a member of my team know as soon as possible.
4. Reply to this letter with:
- 25 a) Your general comments on the allegation that your alleged actions have resulted in further breaches of Rule 5 of the Code of Conduct for Members.
- b) Your general comments on the allegation that your alleged actions have resulted in further breaches of Rule 12 of the Code of Conduct for Members.
- 30 c) Your answers to the following specific questions. Please submit any relevant evidence to support your responses when you reply to this letter.

Question 1: Please provide the full details of your shareholding in the unnamed Vietnamese Company, specifically:

- the name of the company;
- the date you acquired the shares;

- the percentage of shares held; and
- the value of the shares.

Question 2: Please provide the date you acquired the shares in 315 Holding Company PTE Ltd (Nhi Dong 315).

5 Question 3: Please provide a fulsome explanation of how you overlooked these shareholdings both when initially registering your interests after your election and later when you sold the shares in 315 Holding Company PTE Ltd (Nhi Dong 315).

Question 4: Please confirm that your Register entry is up to date.

10 d) Any other points you wish to make to help me with my inquiry.

5. As I am extending this inquiry, I remind you that if you would like to request a meeting under paragraph 35 of the Procedural Protocol, please let me know by return.

15 Please could you reply by 30 June 2025. In the meantime, our correspondence remains protected by parliamentary privilege, and I must ask that you continue to maintain the strict confidentiality of the inquiry.

23 June 2025

18. Email from Charlie Maynard MP to the Commissioner, 30 June 2025

20 Thank you for your email to me of 23rd June. Please find my answers to your questions in section (4) of your letter below:

a) Your general comments on the allegation that your alleged actions have resulted in further breaches of Rule 5 of the Code of Conduct for Members:

25 Yes, I fully accept that by not registering my shares in 315 Holding Company PTE Ltd (Nhi Dong 315) within 28 days of being elected, I have breached Rule 5 of the Code. This was completely unintentional and as with the other breaches, is a highly regrettable mistake on my part.

30 I would like to emphasise that I have not benefitted in any way from failing to register these shares earlier. I also do not believe any of the work I did as an MP during the time I held these shares related to Vietnam or the business of the company (which operates paediatric clinics & specialty pharmacies in Vietnam).

b) Your general comments on the allegation that your alleged actions have resulted in further breaches of Rule 12 of the Code of Conduct for Members:

5 I completely accept that I made the mistakes in my previous correspondence to you, which you have set out in your letter. It was incorrect for me to claim that my entry into the register of interests was fully up to date, when I now know I had failed to register these shares.

10 It was never my intention to mislead or fail to cooperate with the inquiry. When I stated previously that my register was up to date, I honestly thought that it was – the need to register these shares and the use of my sister-in-law’s flat, had not occurred to me at that point.

15 I also hope I have demonstrated my intention to fully cooperate with your investigation by proactively bringing these other interests to your attention as soon as I realised I should do so and by giving frank explanations for my mistakes in my emails to you since.

c) Your answers to the following specific questions. Please submit any relevant evidence to support your responses when you reply to this letter.

20 **Question 1: Please provide the full details of your shareholding in the unnamed Vietnamese Company, specifically:**

- **The name of the company:** OneTrip Asia Limited, now registered in Singapore, doing business as VN Trip
- **The date you acquired the shares:** February 2019
- **The percentage of shares held:** 0.04%
- 25 • **The value of the shares:** £1,428.27 (based off a 15th April 2025 valuation estimate. Based on this valuation, my understanding is that I do not need to register this interest as it does not reach the threshold of £70,000 for registration of shareholdings.

30 **Question 2: Please provide the date you acquired the shares in 315 Holding Company Pte Ltd (Nhi Dong 315):** February 2021

Question 3: Please provide a fulsome explanation of how you overlooked these shareholdings both when initially registering your interests after your election and later when you sold the shares in 315 Holding Company PTE Ltd (Nhi Dong 315):

I simply forgot that I owned the shares in 315 when I was originally registering my interests after my election and I did not make the connection when I sold the shares in February, that I needed to register them. I fully recognise that this is entirely my mistake and I am at fault on both counts.

5 While it doesn't excuse this mistake, the only explanation I can offer is that from the point of my election, I have been working extremely long hours and found myself pulled in so many different directions that on reflection I should have taken a more thorough inventory. I really wish that I had made the connection both at the outset and at the points of the sale. I have self-reported this information to you because I
10 want to put my record straight. There has been no benefit to me from not reporting this earlier (and I would be happy to provide any further information to support this, for example my diary – in which you will see that I have not held any relevant meetings, for example).

15 By reporting the information to you late I realise now have the very real risk of being sanctioned and I take that possibility very seriously. However, I have brought this to your attention because I really want to own this mistake and put it right. I can only say again that I sincerely apologise for this and previous errors.

20 If there is further information which would be useful to you, either on the company or my prior investment in it or any of my parliamentary work (to demonstrate that I have not worked on anything related to the activities of 315) then please do let me know and I am happy to provide it.

Question 4: Please confirm that your Register entry is up to date: Yes. I have now updated my register of interests to reflect the 315 investment. That interest is now listed as in 'registrar review' status in my register of interests.

25 Any other points you wish to make to help me with my inquiry: I wrote to you in January highlighting that I was planning to work with a legal team on a pro-bono basis on a case involving Thames Water. This inquiry was triggered when I failed to register the pro-bono legal advice I received from this Thames Water case. I had not appreciated that I had needed to register that pro-bono advice until this was brought
30 to my attention.

Everything else covered in your extended inquiry I have self-reported which I hope shows that I have not purposely withheld information from you or your investigation.

35 The second event was triggered when I realised that I needed to report that I was staying at my sister-in-law's flat at no cost and with no written agreement in place. I was pleased to be saving money for the public purse and had not appreciated I needed to register the benefit derived from a close family member.

40 The third event was triggered by me self-reporting an interest in a company which I had forgotten I owned and which I sold in February.

As stated above, I have reported this information as I recognise I should have done so earlier and I want to put the record straight. While I entirely accept that these were breaches of the Code, I hope I have acted in a transparent manner by proactively bringing them to your attention.

- 5 (5) A meeting under paragraph 35 of the Procedural Protocol: I have explained here, as fully as possible, the reasons for my errors so I don't feel the need to request a meeting with you at this point. However, if you would find it helpful to discuss any of the above in person I am of course available and willing to do so at a time of your convenience.

10 *30 June 2025*

19. Letter from the Commissioner to the Registrar of Members' Financial Interests, 21 July 2025

15 I would like to ask your advice on an investigation I am undertaking into Charlie Maynard MP. I am investigating whether Mr Maynard has breached Rule 5 of the Code of Conduct by failing to register within the 28-day deadline set by the House:

- The free accommodation in a London flat provided by Mr Maynard's sister-in-law since his election in July 2024; and
- Shares in 315 Holding Company Pte Ltd (Nhi Dong 315).

20 As part of my investigation, I am seeking confirmation of whether Mr Maynard approached you or your team for advice in relation to the above interests. If they did, please provide me with the information they provided to you or your office, and what advice they were given in response, please include any specific advice given regarding the category under which the interest should be registered.

25 If they did not seek your advice, please can you outline what advice you would have provided had you been approached. Please can you also confirm which category you would have advised Mr Maynard to register each interest under and why.

When providing your advice, please state whether the following information was/would have been taken into account, and if so, what impact it had on your advice:

- 30
- Mr Maynard's sister-in-law lives and works in the U.K. however she is a Dutch national.
 - Mr Maynard sold the shares in 315 Holding Company Pte Ltd (Nhi Dong 315) on 14 February 2025 for approximately £126,865.59.

It would be helpful to understand the factors and rules you took into account/would have taken into account when giving that advice.

Please could you reply by 4 August 2025.

Thank you for your assistance.

5 21 July 2025

20. Letter from the Registrar of Members' Financial Interests to the Commissioner, 29 July 2025

Thank you for your email regarding the investigation into Charlie Maynard MP.

My answers to your questions are set out below.

10 If you need further information, please do not hesitate to contact me.

[Name redacted]

1. Accommodation provided by a family member

15 The Code of Conduct and Guide to the Rules has two categories for gifts, benefits and hospitality. Category 3 is for UK sources and Category 5 is for sources outside of the UK.

Category 3: Gifts, benefits and hospitality from UK sources

Threshold for registration

20 *21. Members must register, subject to the paragraphs below, any gifts, benefits or hospitality with a value of over £300 which they receive from a UK source. They must also register multiple benefits from the same source if these have a value of more than £300 in a calendar year.*

Category 5: Gifts and benefits from sources outside the UK

Threshold for registration

25 *38. Members must register, subject to the paragraphs below, any gifts or benefits with a value of over £300 which they receive from a source outside the UK. They must also register multiple benefits from the same source if taken together these have a value of more than £300 in a calendar year.*

Having regard to the email exchange below, I advised that this interest be registered under Category 5 as I was not certain the family member was resident in the UK. Mr Maynard followed my advice and registered this under Category 5.

The correspondence is set out below.

5 Email correspondence between the Registry Office and Mr Maynard's office.

From: Commons Registrar
Sent on: Tuesday, June 3, 2025 10:20:47 AM
To: [Name redacted]
Subject: RE: Register inquiry
Hi [Name redacted],

Please register this under Category 5: Gifts and benefits from sources outside the UK .

Regards,

10 [Name redacted]

From: [Name redacted]
Sent: 03 June 2025 11:11
To: Commons Registrar
Subject: Re: Register inquiry

15

Good morning [Name redacted],

We now have a quote for the value. Just waiting to find out what category Charlie should register under and then we will do so straight ahead.

Thank you in advance.

20 [Name redacted]

From: MAYNARD, Charlie
Sent: Monday, June 2, 2025 12:55
To: Commons Registrar
Cc: [Name redacted]
Subject: FW: Register inquiry

25

Dear [Name redacted]

[Name redacted] forwarded on your email below to me. My sister-in-law has let me stay in her apartment in London since I was elected in July 2024. She has never rented it out so we don't have an exact rental value, but I will now work on getting an estimate from a professional third party.

One further point, my sister-in-law is a Dutch national, working and living in the UK. Should this be registered as a Category 3 or Category 5 interest?

I am copying in [Name redacted] here as I am keen that the Standards Commissioner is aware of this issue while we are working out the exact registration. As soon as these points are settled, I will register it.

Kind regards,

Charlie

From: Commons Registrar
Sent: Friday, May 30, 2025 15:20
To: [Name redacted]
Subject: RE: Register inquiry

Dear [Name redacted]

If this is a long-term arrangement, and the use of the apartment is being provided free of charge, it will require registration under Category 3: Gifts, benefits and hospitality from UK sources.

The threshold for this category is a value of over £300 in a calendar year. If you cannot get a value, you are able to use an estimate. I have attached the Commissioner's Advice Note on Estimates which may be helpful.

Regards,

[Name redacted]

From: [Name redacted]
Sent: 27 May 2025 10:03
To: Commons Registrar
Subject: Register inquiry

Good Afternoon,

My boss recently moved into his sister-in-law's apartment in London. We were wondering if this needs to be declared as a gift as it is unclear in the guidance.

Kind regards,

5 [Name redacted]

2. Shares in 315 Holding Company Pte Ltd (Nhi Dong 315)

10 No specific advice was sought on the shareholding in 315 Holding Company Pte Ltd. However, general advice was provided as a follow-up to the induction conversation held with Mr Maynard following the General Election. Given the pressure on time to brief all new Members within the first month, no notes were taken of that meeting. Subsequent email correspondence is set out below.

If Mr Maynard had sought advice on this company, I would have explained that the thresholds for registration are as follows:

15 **Category 7: Shareholdings**

Threshold for registration

50. Members must register, subject to the paragraphs below, any holdings which:

20 *i) amount to more than 15% of the issued share capital of that company, or more than 15% of a partnership;*

ii) are valued at more than £70,000.

25 From the value of the shares you provided, the shareholding would have required registration as it met the threshold under paragraph 50(ii). That entry would have needed to be updated with the date on which the shareholding was sold. There is no requirement to register the amount that the shareholding was sold for.

Email correspondence between the Registry Office and Mr Maynard's office.

[Copies of irrelevant emails have been redacted]

From: Commons Registrar
Sent: Friday, July 26, 2024 4:24 PM

To: MAYNARD, Charlie (Private)
Cc: Commons Registrar
Subject: Registration of Financial Interests

5 Dear Mr Maynard,

Following on from our meeting earlier this week, I have spoken again to the Registrar and I hope the following information is helpful.

Dividends you receive from shares that you own do not require registration.

10 You are not required to register the investment fund we spoke about, as you do not have decision making responsibilities for this investment vehicle.

You mentioned that your shareholding in one company may be close to 15%, and that you have another shareholding in a windfarm company.

You will need to ascertain whether each shareholding is over 15% and if it is it will need registering under Category 7: Shareholdings.

15 If it does not and only if you consider it meets the test of relevance (that it might reasonably be thought by others to influence your words or actions as an MP) you must register this interest under Category 8: Miscellaneous, including the information that this holding falls below the threshold required under Category 7.

20 Finally, If your step-sibling's role meets the definition of lobbying in paragraph 61 of Chapter 1 of the Guide to the Rules, you must register it.

[Name redacted]

29 July 2025

21. Letter from the Commissioner to Charlie Maynard MP, 20 August 2025

25 I have now reached the end of my investigation and would like to give you a final opportunity to provide any last evidence or comments on the matters under investigation by 28 August 2025.

In addition to the above, I would ask that you provide the following information:

- 30 1. In your emails dated 18 and 30 June 2025 you confirmed that you had purchased the shares in 315 Holding Company Pte Ltd (Nhi Dong 315) prior to your election in July 2024, and you state that you should have registered this interest following your election. Please can you confirm the value of the shares at the time of your election.

Next Steps

If I do not uphold the allegation or decide to resolve it using the rectification procedure, you will receive a copy of my decision letter shortly. You will also receive a copy of my draft written evidence pack for your comments on its accuracy and as an opportunity for you to suggest any additional redactions.

If I decide to conclude this matter by referring a memorandum to the Committee on Standards, I will share with you shortly a draft copy of my memorandum and invite your comments on its factual accuracy.

In the meantime, our correspondence remains protected by parliamentary privilege, and I must ask that you continue to maintain the strict confidentiality of the inquiry.

Thank you for your continued co-operation with this matter.

20 August 2025

22. Email from Charlie Maynard MP to the Commissioner, 27 August 2025

Thank you for your letter attached to the email below. In that letter you ask me to confirm the value of the shares at the time of my election.

The Vietnamese company is private so there is no active market in the company's shares or day-to-day valuation. However, I do have one datapoint which is useful as I sold some shares in the company in August 2023 and I have set out below the information I have relating to that sale. As per the table below, the value of the shares declined 28% over the period between Aug 2023 and Feb 2025.

2023 sale		2025 sale	
Initial # of shares in 315	46,497	Remaining # of shares in 315	37,500
# of shares sold in 2023	8,997	# of shares sold in 2025	37,500
amount received in 2023 (US\$)	53,280	amount received in 2025 (US\$)	159,425
amount per share (US\$)	5.92	amount per share (US\$)	4.25

Given the lack of market data, I estimate below using a straight-line diminution of value over the time period between the two sales to come to an estimated value of the shares as of July 5th of US\$185,707.

implied value of remaining shares of 30 Aug 2023 (US\$)	222,079
value received as of 14 Feb 2025 (US\$)	159,425
loss in value (US\$)	62,654
30 Aug 2023 - 14 Feb 2025	534 days
loss in value per day over period (US\$)	117.33
30 Aug 2023 - 5 July 2024	310 days
estimated value as of 5 July using straight line method (US\$)	185,707

I hope this is helpful. Please let me know if I can help further.

27 August 2025

23. Letter from the Commissioner to Charlie Maynard MP, 11 September 2025

5 I enclose a copy of the draft of my memorandum to the Committee, along with the written evidence on which I have relied. This is in accordance with the arrangements under paragraph 55 of the Procedural Protocol in relation to the Code of Conduct.

10 There are three things I should explain about the draft memorandum. The first is that under paragraph 56 of the Procedural Protocol, the final content of my memorandum is a matter for me alone. However, I would welcome your comments on its factual accuracy.

Secondly, while I have included my draft analysis, I should highlight that this might change in the light of any comments you make on the factual accuracy of the memorandum.

15 Thirdly, you will note that the draft memorandum makes recommendations only to the Committee; the decision in this matter lies with the Committee. How the Committee reaches its decision is outlined in Section 4 of the Procedural Protocol.

20 You will see that I have redacted the personal details of third parties where that information is not relevant to my opinion and decisions. If you think I should consider redacting any additional material, please identify the material and explain why you think it should be redacted. I will consider carefully any such request.

I would be grateful to have your comments on the draft memorandum as soon as possible and by no later than 25 September 2025. I would be grateful if there is no delay to this response so the matter can be sent for conclusion to the Committee as soon as possible.

25 The Clerk would then let you know when a date has been arranged for the Committee to consider the memorandum and he will send you a copy of the final text shortly before the Committee meeting.

30 In the meantime, our correspondence about this inquiry remains protected by parliamentary privilege and you should continue to keep this matter strictly confidential.

11 September 2025

24. Email from Charlie Maynard MP to the Commissioner, 15 September 2025

Thank you for your letter dated 8th September and your draft memorandum. Thank you also for your offer for me to give comments regarding factual accuracy. I am

reverting here on that offer. As outlined in your draft, my conscientiousness, integrity, accountability and openness are all being examined. With that in mind, I am writing here to ask that you include the following facts in your memorandum and this email in the appendix.

- 5 I will address each of the matters in turn below.

Pro-bono advice

10 Please could you include the email I wrote to you on January 16th, which I have copied below as well as your reply which I received from you on January 19th, which I have attached. I think it is relevant to highlight that right at the start of this process, when I was planning to intervene in this process, that I wrote to you seeking your advice on this matter. It's also relevant that I sought advice both from the public bill office and from my Chief Whip. In each of the emails I sent I specifically stated that I was writing to notify each party and seek their advice on the fact that I am seeking to act as an "intervener" in the High Court proceedings relating to Thames Water's
15 restructuring plan. I also state that I will be engaging legal advice on a pro-bono basis. I had never attempted to do anything like this before and I was very keen to make sure that I did it correctly.

20 You were the only party to reply in writing. None of the replies I received referenced the need to update my register of interests. That does not mean that I am seeking to absolve myself of that responsibility, but as an MP just over six months into the job, I believe that my actions show my desire to be compliant. I also believe those actions show conscientiousness, integrity, a willingness to be accountable for my actions and a desire to be open about my actions.

25 You may not consider the next part relevant, but I think the background is important. I was seeking to intervene in this restructuring process because 16 million customers were unrepresented in the court. I believed this situation was unfair, as did the barrister and solicitors who decided to represent me over many months at no charge. I was warned at the outset that the parties on the other side of case could come after me personally, and they have, with them now exploring
30 whether they can put as yet unspecified legal costs on me for having the temerity to stand up for Thames Water's 16 million customers.

Staying at my sister-in-law's flat

35 I discussed my accommodation plans with the IPSA team both verbally and in writing (see August 7th email pasted below) a few weeks after becoming a MP. At no point in that discussion did the IPSA team tell me that if I was staying at [Redacted] flat that I needed to update my Register of Interests. Again, I am not seeking to absolve myself of the responsibility of registering this interest, but this communication does demonstrate that at the outset I was openly discussing the issue with parliamentary staff with the goal of being compliant and that I was
40 seeking advice on how to be compliant.

I understood that if I was staying at [redacted's] flat I could not claim accommodation expenses and I have never sought to do so. Ironically, I was pleased to be saving the taxpayer this money and I have now fallen foul by doing so. I think these actions show that I was being conscientious, open and accountable and the act of saving the taxpayer up to £31,840 in the last full financial year suggests integrity rather than a lack of it.

Vietnamese shares

This was a mistake, plain and simple. I forgot I owned these shares and I should not have forgotten. So yes, I fully accept that I should have been more conscientious here. As soon as I realised that I should have registered them and have registered that I sold them, I did so. I realised that disclosing my mistake would result in a number of negative impacts, but I decided that I would rather fully disclose it than not, as I believe in the Nolan principles and my obligations as an MP.

I think it is also important to state that neither owning these shares nor selling these shares has had any bearing on the parliamentary work I have done since being elected. Nor has there been any financial or other advantage to me from not registering them at the outset.

I would like to give my sincere apologies again. I hope the above new information materially changes your view of the overall situation. Finally, please can I meet with you as I am keen to understand better the next steps from here and what I need to prepare for. I know conference recess is looming, but if you are available, I would like to meet with you in person in Westminster as early as is convenient to you, including during recess.

Kind regards, Charlie

Attachment 1: Letter from the Commissioner to Charlie Maynard, 19 January 2025

This note responds to your e-mail to me of 16 January 2025 notifying me and seeking advice in respect of your intention to intervene in legal proceedings relating to a proposed restructuring plan under Part 26A of the Companies Act 2006.

It appears that you are proposing to intervene formally through legal representatives in accordance with rules of court and any orders of the judge.

On that assumption, your participation would appear to be the formal and transparent submission of evidence or arguments in the same way as any other interested party might seek to do, and not an attempt to use your status as an MP to interfere with the process of justice or with judicial independence.

On that basis, your proposal appears to engage paragraph 13 of my Advice Note PCS/AN/2023.05 (MPs Writing to Judges) rather than paragraph 2, and does not appear to offend against the principle of the separation of powers adumbrated in that Advice Note.

- 5 I note that you copied your e-mail to me to the Public Bill Office; I am accordingly copying this note to the Clerk of Legislation and to the Clerk of the Journals.

Attachment 2: Email from Charlie Maynard MP to the Commissioner, 16 January 2025

10 From: MAYNARD, Charlie (Private) [Redacted]
 Sent: Thursday, January 16, 2025 8:14 AM
 To: Standards Commissioner [Redacted]
 Cc: [Redacted]
 Subject: Thames Water restructuring plan sanctions hearing / seeking to intervene

15 Dear Daniel (if I may),

Thames Water, through Thames Water Utilities Limited (TWUL), is seeking to progress a restructuring plan, under Part 26A of the Companies Act 2006, which will extend its liquidity by adding a further £3bn in debt. A Sanctions Hearing is set for
 20 the first week of February. Creditors involved in the plan are granted the right to attend the convening hearing in person or through counsel to make representations.

I am writing here both to notify you and seek your advice on the fact that I am seeking to act as an “intervener” (that is, not an existing party to the proceedings), looking to put forward the interests of the wider community and to shed light on
 25 other matters which are considered to be important for the court to hear, but which are matters which are not considered to have been either properly or fully addressed by the other parties

I would not be a party to litigation but would be intervening to provide the Court with some assistance regarding the public interest considerations in respect of the restructuring, and the potential benefits of special administration. In many respects
 30 I would (through my pro-bono legal representatives) simply be saying in Court what I have been saying in Parliament and campaigning. But I would be putting those points to the judge for consideration, in circumstances where otherwise the judge is unlikely to be addressed on those points by the other parties in the restructuring
 35 process given their private interests as creditors.

A precedent with the Commons related bodies, would be where MPs from the APPG on Fair Business Banking intervened in this way at a Supreme Court appeal - <https://www.simmons->

simmons.com/en/publications/ck0akhnfdnedj0b36sgg2fi1p/10062019-reflective-loss-mps-have-intervened-in-the-marex-supreme-court-appeal

For your information, I have also written to the Public Bill Office and am also discussing this internally with Liberal Democrat colleagues.

5 Kind regards, Charlie Maynard

Attachment 3: Email from Charlie Maynard MP to IPSA, 7 August 2024

From: Charles Maynard [Redacted]

Received: Wed Aug 07 2024 09:29:42 GMT+0100 (British Summer Time)

10 To: Enquiries [Redacted]

Subject: Attn: [Redacted]

Dear [Redacted],

15 Hi there and thanks very much for calling yesterday. I have a couple of follow up questions regarding accommodation.

If was to buy a flat in London, would I be able to offset some of the mortgage costs in lieu of paying rent?

20 If I was to continue to stay at my sister-in-law's flat, pay her rent and not use my accommodation allowance, could I then transfer my unused accommodation allowance to be used for other business costs, such as staff costs?

Thanks, Charlie

15 September 2025