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Llywodraeth Cymru
Welsh Government

The Rt Hon Vaughan Gething
Former First Minister of Wales

BY EMAIL:

15 June 2026

Dear The Rt Hon Vaughan Gething,

Thank you for seeking my advice under the Welsh Government's Business Appointment Rules for Former Ministers (the "Rules") in respect of the role of Non-Executive Director at N3XUS Ltd.

The Rules exist to protect the integrity of government and to safeguard public confidence in government by ensuring that former Ministers do not, and are not perceived to, derive improper advantage or profit from their time in office, or confer such advantage on others. In considering your application, my focus is therefore on whether any risks arise from your previous role and, if so, how these can be appropriately managed.

The material information and my consideration of your application are set out in the Annex. This formal advice is provided to establish the standard conditions that apply to all Level 2 applications, irrespective of their nature.

Standard Conditions

- **Privileged information condition** - You may draw on skills and experience gained from your time in office however you must not, at any time, draw on any privileged information gained in office. This is an ongoing duty irrespective of the time elapsed since you left office.
- **Lobbying condition** - Any contact with the Welsh Government, directly or indirectly must only be where it could not reasonably be perceived as lobbying. This applies for two years after leaving office.
- **Contracts and bids condition** - You must not work or advise on any bids to secure governmental funding or contracts. This applies for two years after leaving office.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



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I would also ask you to note the following points:

- This advice does not constitute an endorsement of the role with N3XUS. It is confined to the application of the Rules and the management of any risks arising from your former ministerial role.
- This advice relates solely to your previous role in government as First Minister. It does not extend to, or replace, any rules administered by other bodies, including the Senedd Commission in respect of your previous role as a Member. It is your personal responsibility to ensure that you understand and comply with any other applicable rules and regulatory requirements alongside this advice.
- In this context, “privileged information” means information to which you had access by virtue of your various ministerial roles and which is not publicly available. You may also continue to be bound by other confidentiality obligations, including those under the Official Secrets Act, the Ministerial Code, or similar requirements.
- As set out in the Rules, the lobbying restriction prevents former Ministers from engaging in communication with government (including Ministers, civil servants, special advisers, and other public office holders), wherever that communication takes place, with a view to influencing a government decision, policy, or the award of a contract or grant in relation to their own interests or those of the organisation with which they are associated.

Yours sincerely,



Dr Melissa McCullough

Independent Adviser on Ministerial Standards / Cynghorydd Annibynnol ar Safonau Gweinidogol

Annex – Material information and consideration of the risks

The Role

You submitted a Level 2 application in relation to the role of Non-Executive Director at N3XUS-AI Ltd (“N3XUS”) a technology business providing digital infrastructure to validate and improve ESG performance and governance. The role will involve supporting N3XUS on a strategic advisory basis for approximately two days per month. You state that the role would not require any dealings or interactions with your former department or the Welsh Government.

Assessment

You were approached by N3XUS after leaving the Senedd. You have been offered a part-time non-executive strategic advisory role with N3XUS.

Evidence indicates that during your time as First Minister and as Minister for Economy (which was more than two years ago) you had no interactions or engagements with N3XUS. There has been no financial links between the Welsh Government and N3XUS-AI Ltd since it was incorporated in 2024.

As recognised in the Business Appointment Rules, it is in the public interest that former Ministers are able to move into business or other areas of public life, including starting a new career or resuming a former one. It is equally important that, when a former Minister takes up any appointment or employment, there is no cause for concern as to its propriety.

Consideration of the risks

Having considered the factors set out above, together with the information you have provided, I have identified no reasonable basis for public concern in relation to your taking up the part-time role of Non-Executive Director at N3XUS. I therefore see no grounds on which to advise against your acceptance of the role. Any risks that do arise can be appropriately managed through the standard conditions.

Dr Melissa McCullough

15 June 2026