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**AN BILLE UM CHLÁRÚ BRÚSTOCAIRÍ 2008**  
**REGISTRATION OF LOBBYISTS BILL 2008**

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*Mar a tionscnaíodh*  
*As initiated*

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**ARRANGEMENT OF SECTIONS**

**Section**

1. Short title and commencement.
2. Interpretation.
3. Restriction on application of Act.
4. Returns relating to lobbying activities of agents.
5. Returns relating to lobbying activities of employees.
6. Obligation to certify returns.
7. Register of returns.
8. Lobbying activities by public officials.
9. Code of conduct.
10. Guidelines and advice.
11. Investigation by Commission.
12. Reports of Commission.
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14. Regulations.
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**SCHEDULE 1**

**PUBLIC BODIES**

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**LOBBYISTS' CODE OF CONDUCT**

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# ACTS REFERRED TO

Companies Act 1963	1963, No. 33
Companies Acts 1963 to 2005	
Electoral Act 1997	1997, No. 25
Ethics in Public Office Act 1995	1995, No. 22
Ethics in Public Office Acts 1995 and 2005	
Local Government Act 2001	2001, No. 37
Ministers and Secretaries Acts 1924	1924, No. 16
Prevention of Corruption Acts 1889 to 2005	
Public Offices Fees Act 1879	42 & 43 Vic., c. 58
Standards in Public Office Act 2001	2001, No. 31



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**AN BILLE UM CHLÁRÚ BRÚSTOCAIRÍ 2008**  
**REGISTRATION OF LOBBYISTS BILL 2008**

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# **BILL**

*entitled*

5 AN ACT TO PROVIDE IN THE PUBLIC INTEREST FOR THE  
REGISTRATION OF PAID LOBBYISTS AND, TO THE  
GREATEST EXTENT POSSIBLE CONSISTENT WITH  
THE PUBLIC INTEREST IN FREE AND OPEN ACCESS  
10 TO CENTRAL AND LOCAL GOVERNMENT, FOR THE  
DISCLOSURE OF THEIR ACTIVITIES, AND TO  
PROVIDE FOR RELATED MATTERS.

BE IT ENACTED BY THE OIREACHTAS AS FOLLOWS:

1.—(1) This Act may be cited as the Registration of Lobbyists Act 2008. Short title and commencement.

15 (2) This Act comes into operation on the day that is 6 months  
after the day of its passing.

2.—(1) In this Act, except where the context otherwise requires— Interpretation.

“benefit” includes—

20 (a) a right, privilege, office or dignity and any forbearance to  
demand money or money’s worth or a valuable thing,

(b) any aid, vote, consent or influence or pretended aid, vote,  
consent or influence,

25 (c) any promise or procurement of or agreement or endeavour  
to procure, or the holding out of any expectation of,  
any gift, loan, fee, reward or other thing aforesaid,

or other advantage and the avoidance of a loss, liability, penalty,  
forfeiture, punishment or other disadvantage;

“Code of Conduct” means the Lobbyists’ Code of Conduct given  
effect to by *section 9* and set out in *Schedule 1*;

30 “the Commission” means the Standards in Public Office Commission  
established by section 21 of the Ethics in Public Office Act 1995 as  
amended by section 2 of the Standards in Public Office Act 2001;

“company” means any body corporate;

“government” means the government of any state other than the State;

“Minister” means the Minister for Finance;

“payment” means money or any valuable consideration and includes a contract, promise or agreement to pay money or any valuable consideration; 5

“person” includes a government, government agency or other organ of public administration of another state;

“prescribed” means prescribed by regulations made by the Minister; 10

“public official” means—

- (a) a Minister of the Government or a Minister of State,
- (b) the Attorney General,
- (c) a member of Dáil Éireann or Seanad Éireann,
- (d) a person employed by a member of Dáil Éireann or Seanad Éireann in that member’s capacity as such or by a political party registered in the Register of Political Parties, 15
- (e) a special adviser, within the meaning of section 19 of the Ethics in Public Office Act 1995, 20
  - (i) a person who is a director, within the meaning of the Companies Acts 1963 to 2005, of a public body,
  - (ii) in the case of a public body that is not a company (within the meaning of those Acts) and that stands prescribed for the purposes of paragraph (2) of Schedule 1, a person who is a member of it or a member of any board or other body that controls, manages or administers that public body, and 25
  - (iii) a person who occupies a position of employment in a public body, 30
- (f) a member of the Defence Forces, and
- (g) a member of the Garda Síochána; and

“public body” shall be construed in accordance with Schedule 1.

(2) For the purposes of this Act, a person engages in lobbying activities where he or she— 35

- (a) communicates with a public official, or
- (b) arranges a meeting between a public official and any other person,

in an attempt to influence—

- (i) the development of any legislative proposal by the Government, a Minister of the Government or a 40

Minister of State or by a member of Dáil Éireann or Seanad Éireann,

- (ii) the introduction of any Bill or resolution in either House of the Oireachtas or the passage, defeat or amendment of any Bill or resolution that is before either House of the Oireachtas,
- (iii) the making, revocation or amendment of any statutory instrument,
- (iv) the development or amendment of any policy or programme of a public body, or
- (v) the awarding of any contract, grant, contribution or other benefit by or on behalf of a public body.

**3.—(1)** This Act does not apply to the following persons when acting in their official capacity: Restriction on application of Act.

- (a) diplomatic agents, consular officers or official representatives in the State of a foreign government;
- (b) officials of the institutions of the European Union; or
- (c) officials of a specialised agency of the United Nations in the State or officials of any other international organisation to whom there are granted, by or under any enactment, privileges and immunities.

**(2)** Nothing in this Act compels the disclosure or production by any person of any information or document—

(a) consisting of or wholly related to—

- (i) legal advice, communicated in confidence by that person's lawyer, or
  - (ii) a communication between that person and another person, or that person's lawyer and another person, made for the purposes of pending or contemplated litigation, or
- (b) which he or she would, were the information or document required to be disclosed or produced by him or her in legal proceedings, be entitled to refuse to disclose or produce by reason of any privilege other than legal professional privilege.

**(3)** Nothing in this Act shall be construed as requiring the disclosure of the name or identity of any person where that disclosure could reasonably be expected to threaten the safety of that person.

**4.—(1)** A person who, for payment or any other consideration, on behalf of another person (in this section referred to as “the client”), undertakes to engage in lobbying activities shall— Returns relating to lobbying activities of agents.

- (a) not later than 10 days after entering into that undertaking, file with the Commission in the prescribed form a return setting out the information referred to in *subsection (3)*, and

- (b) as soon as is reasonably practicable thereafter, send to the relevant public official a copy of that return.

(2) Where a person undertakes to engage in lobbying activities in consideration of a donation (within the meaning of section 22 of the Electoral Act 1997) being made to a political party of which he or she is a member, that person shall be deemed to have entered into that undertaking for payment and *subsection (1)* shall apply accordingly. 5

(3) The return mentioned in *subsection (1)* shall set out the following information with respect to the undertaking: 10

- (a) the name and business address of the person and, if applicable, the name and business address of the firm where the person is engaged in business;
- (b) the name and business address of the client and the name and business address of any person or organisation that, to the knowledge of the person, controls or directs the activities of the client and has a direct interest in the outcome of the person's activities on behalf of the client; 15
- (c) where the client is a company, the name and business address of each subsidiary of the company that, to the knowledge of the person, has a direct interest in the outcome of the person's activities on behalf of the client; 20
- (d) where the client is a company that is a subsidiary of any other company, the name and business address of that other company; 25
- (e) where the client is funded in whole or in part by a government, the name of the government or government agency and the amount of funding received by the client from that government or government agency;
- (f) particulars to identify the subject matter in respect of which the person has undertaken to communicate with a public official or to arrange a meeting and such other information respecting the subject matter as is prescribed; 30
- (g) where applicable, whether the payment to the person is in whole or in part contingent on the outcome and degree of success of the lobbying activities; 35
- (h) particulars to identify any relevant legislative proposal, Bill, resolution, regulation, policy, programme, grant, contribution, benefit or contract;
- (i) the name of the public body in which any public official with whom the person has communicated or expects to communicate, or with whom a meeting is to be or has been arranged, is employed or serves; 40
- (j) where the person has undertaken to communicate with a public official for the purpose of engaging in lobbying activities, particulars to identify any communication technique (including appeals to members of the public through the mass media or by direct communication that seek to persuade members of the public to communicate directly with a public official in an attempt to persuade the public official to endorse a particular opinion) that 45 50

the person has used or expects to use in an attempt to influence that matter; and

(k) such other information relating to the identity of the person, the client, any person or organisation referred to in *paragraph (b)*, any subsidiary referred to in *paragraph (c)*, the other company referred to in *paragraph (d)*, or any public body referred to in *paragraph (j)* as is prescribed.

(4) A person who files a return shall provide the Commission with—

(a) any change to the information provided by the person in the return, and

(b) any information required to be provided under *subsection (2)* the knowledge of which the person acquired only after the return was filed,

not later than 30 days after the change occurs or the knowledge is acquired.

(5) A person who completes or terminates an activity in respect of which the person has filed a return shall advise the Commission of that fact not later than 30 days after the activity is completed or terminated.

(6) A person who files a return shall provide the Commission with such information as the Commission may request to clarify any information that the person has provided to the Commission pursuant to this section, and shall do so not later than 30 days after the request is made.

(7) This section does not apply in respect of anything that an employee undertakes to do on the sole behalf of his or her employer or, where that employer is a company, in respect of anything that the employee, at the direction of the employer, undertakes to do on behalf of any subsidiary of the employer or any company of which the employer is a subsidiary.

(8) A person who undertakes to communicate with a public official as described in *subsection (1)(a)* is required to file only one return under that subsection notwithstanding that the person may, in connection with that undertaking, communicate with one or more public officials on one or more occasions.

5.—(1) Where a person employs another person a significant part of whose functions as an employee is to engage in lobbying activities with public officials on behalf of the employer, the employee shall—

Returns relating to lobbying activities of employees.

(a) file with the Commission, in the prescribed form and at the time or times required by *subsection (2)*, a return setting out the information referred to in *subsection (3)*, and

(b) as soon as is reasonably practicable thereafter, send to the relevant public official a copy of that return.

(2) An employee to whom *subsection (1)* applies shall file a return—

- (a) where the functions described in that subsection commenced to be a significant part of his or her duties before the date on which this Act comes into force, within 2 months after that date,
  - (b) where the functions described in that subsection commence to be a significant part of his or her functions on or after that date, within 2 months after the date on which those functions commence to be a significant part of his or her functions, and 5
  - (c) within 2 months after the end of each year, beginning with the year in which the employee is required to file a return pursuant to *paragraph (a)* or *(b)*. 10
- (3) The return shall set out the following information:
- (a) the name and business address of the employee;
  - (b) the name and business address of the employer; 15
  - (c) where the employer is a company, the name and business address of each subsidiary of the company that, to the knowledge of the employee, has a direct interest in the outcome of the employee's activities on behalf of the employer; 20
  - (d) where the employer is a company that is a subsidiary of any other company, the name and business address of that other company;
  - (e) where the employer is an organisation, a description of the organisation's membership and such other information to identify its membership as is prescribed; 25
  - (f) where the employer is funded in whole or in part by a government, the name of the government or government agency and the amount of funding received by the employer from that government or government agency; 30
  - (g) where the employee is attempting to influence any matter described in *section 2(2)(b)(i)* to *(v)* at the time the return is filed, particulars to identify the relevant subject matter and such other information respecting the subject matter as is prescribed; 35
  - (h) particulars to identify the subject matters in respect of which the employee has communicated or expects to communicate with public officials during the year to which the return relates, in an attempt to influence any matter described in *section 2(2)(b)(i)* to *(v)*, and such other information respecting those subject matters as is prescribed; 40
  - (i) particulars to identify any relevant legislative proposal, Bill, resolution, regulation, policy, programme, grant, contribution or benefit; 45
  - (j) the name of any public body in which any public official with whom the employee has communicated or expects to communicate, in connection with any matter referred to in *paragraph (g)* or *(h)*, is employed or serves;



- 5 (k) particulars to identify any communication technique (including appeals to members of the public through the mass media or by direct communication that seek to persuade members of the public to communicate directly with a public official in an attempt to persuade the public official to endorse a particular opinion) that the employee has used or expects to use in an attempt to influence any matter referred to in *paragraph (g)* or *(h)*; and
- 10 (l) such other information relating to the identity of the employee, the employer, any subsidiary referred to in *paragraph (c)*, the other company referred to in *paragraph (d)* or any public body referred to in *paragraph (j)* as is prescribed.
- 15 (4) An employee who files a return shall provide the Commission with—
- (a) any change to the information provided by the employee in the return, and
- 20 (b) any information required to be provided under *subsection (3)* the knowledge of which the employee acquired only after the return was filed,
- not later than 30 days after the change occurs or the knowledge is acquired.
- 25 (5) An employee who files a return shall advise the Commission if the functions described in *subsection (1)* cease to be a significant part of his or her functions or he or she ceases to be employed by the employer, and shall do so not later than 30 days after the event.
- 30 (6) An employee who files a return shall provide the Commission with such information as the Commission may request to clarify any information that the employee has provided to the Commission pursuant to this section, and shall do so not later than 30 days after the request is made.
- (7) In this section, “employee” includes an officer who receives remuneration for the performance of his or her duties.
- 35 6.—Every person who submits a return or other document to the Commission pursuant to this Act shall certify on the return or other document or, where it is submitted in electronic or other form, in the prescribed manner, that the information contained in it is true to the best of his or her knowledge and belief. Obligation to certify returns.
- 40 7.—(1) The Commission shall establish and maintain a register, organised in such manner and kept in such form as the Commission may determine, in which are kept a record of all returns and other documents submitted to it under this Act. Register of returns.
- (2) The register shall be open to public inspection at such place and at such reasonable hours as the Commission may determine.
- 45 (3) The Commission shall also arrange for the publication of the register in electronic form by means of the Internet and without charge.

Lobbying activities  
by public officials.

**8.—(1)** A member of Dáil Éireann or of Seanad Éireann shall not engage in any lobbying activities to which *section 4* or *5* applies.

(2) A person who is a director or member of, or who occupies a position of employment in a public body, shall not for the duration of such appointment, membership or employment, and for 2 years thereafter, engage in lobbying activities to which *section 4* or *5* applies, in respect of the business or affairs of that body. 5

(3) A special adviser shall not, for the duration of his or her service as such an adviser and for 2 years thereafter, engage in lobbying activities to which *section 4* or *5* applies, in respect of the business or affairs of any public body in relation to which the office holder who appointed that adviser has or had functions under any enactment. 10

Code of conduct.

**9.—(1)** The Code of Conduct is set out in *Schedule 2* and has effect in respect of lobbying activities. 15

(2) Every person who is required to file a return under *section 4(1)* or *5(1)* shall comply with the provisions of the Code of Conduct.

Guidelines and  
advice.

**10.—(1)** The Commission—

(a) shall from time to time draw up and publish to persons to whom a provision of *section 4* or *5* applies guidelines concerning the steps to be taken by those persons to ensure compliance by them with this Act generally and, in particular, with the provisions of those sections, and 20

(b) may, at the request of a person to whom a provision of *section 4* or *5* applies, give advice to the person in relation to any provision of this Act or as to the application, in any particular case, of any such provision. 25

(2) When a request is made under *subsection (1)(b)* in relation to a particular case, the provision concerned of this Act does not, as respects the person who made the request, apply in relation to that case during the period from the making of the request to the time when advice is given by the Commission in relation to the case or it declines to give such advice. 30

(3) The Commission shall, within 21 days of the receipt by it of a request for advice under *subsection (1)(b)*, furnish the advice to the person concerned or notify him or her of its decision to decline to do so. 35

(4) A person shall act in accordance with guidelines and advice published or given to the person under this section unless, by so doing, the act concerned would constitute a contravention of another provision of this Act. 40

Investigation by  
Commission.

**11.—(1)** The Commission shall consider all returns and other documents and information submitted to it under this Act.

(2) Subject to the subsequent provisions of this section, where the Commission believes on reasonable grounds that a person may have breached any provision of this Act, the Commission shall investigate and determine whether a breach has occurred. 45

5 (3) (a) Where the Commission, following consideration by it under *subsection (1)* or an investigation under *subsection (2)*, finds an error or omission which it considers to be minor and inadvertent, it shall furnish to the person by whom the documents or information was submitted details of the error or omission and inform that person that he or she may correct the error or make good the omission within the period of 14 days from the date on which the notification issued to that person.

10 (b) Where a person to whom notification has been given under *paragraph (a)* corrects the error or makes good the omission to which the notification relates, to the satisfaction of the Commission, it shall take no further action in the matter.

15 (4) (a) For the purposes of an investigation under *subsection (2)*, the Commission may make such inquiries as it considers appropriate and may require any person to furnish any information, document or thing in the possession or procurement of the person which it may require for the purposes aforesaid.

20 (b) The provisions of subsection (11), (11A) and (11B) of section 32 of the Ethics in Public Office Act 1995, as amended by the Standards in Public Office Act 2001, shall apply and have effect in relation to the performance by the Commission of its functions under this Act.

25 **12.—**(1) Subject to *subsection (3)*, after conducting an investigation the Commission shall prepare a report of the investigation, including the findings, conclusions and reasons for the Commission's conclusions, and cause a copy of it to be laid before each House of the Oireachtas. Reports of Commission.

(2) The report may contain details of any payment received, disbursement made or expense incurred by a person who is required to file a return under *section 4* or *5*, if the Commission considers publication of the details to be in the public interest.

35 (3) Where, either during or after concluding an investigation, the Commission is of the opinion that—

(a) an offence under this Act, the Ethics in Public Office Acts 1995 and 2001 or the Prevention of Corruption Acts 1889 to 2005, or

40 (b) any other offence relating to the performance by a public official of his or her functions,

may have been committed by any person—

45 (i) it shall prepare a report in writing in relation to the matter and furnish it together with any relevant document or other thing in its possession to the Director of Public Prosecutions, who shall notify the Commission as to whether he or she has taken proceedings for an offence in respect of any matter mentioned in the report or has decided not to take any such proceedings and of the final outcome of any such proceedings (including any appeal, whether by way of case stated or otherwise, rehearing or retrial), and

- (ii) it shall add to its report under *subsection (1)* a copy of its report under *subparagraph (i)* and a statement of the notification or notifications aforesaid.

(4) The Commission shall, within 3 months after the end of each year, prepare a report with regard to the exercise of the functions conferred on it under this Act during that year and cause a copy of the report to be laid before each House of the Oireachtas. 5

Prohibition of disclosure of information.

**13.**—The Commission, and every person acting on behalf of or under the direction of the Commission, shall not disclose any information that comes to their knowledge in the performance of their functions under this Act, unless— 10

- (a) the disclosure is, in the opinion of the Commission, necessary for the purpose of conducting an investigation or establishing the grounds for any findings or conclusions, or 15
- (b) the information is disclosed in a report of the Commission or in the course of a prosecution for an offence.

Regulations.

**14.**—(1) The Minister may make regulations—

- (a) requiring a fee to be paid on the filing of a return or a return of a class of returns under *section 4* or *5*, or for any service performed or the use of any facility provided by the Commission, and prescribing the fee or the manner of determining it, 20
- (b) respecting the submission of returns or other documents to the Commission under this Act, including their submission in electronic form, the persons or classes of persons by whom they may be submitted in that form and the time at which they are deemed to be received by the Commission, 25
- (c) prescribing any matter or thing that by this Act is to be or may be prescribed, and 30
- (d) generally for carrying out the purposes and provisions of this Act.

(2) The Public Offices Fees Act 1879, does not apply to fees under this section. 35

Offence.

**15.**—A person who knowingly makes any false or misleading statement in any return or other document submitted to the Commission under this Act whether in electronic or other form, is guilty of an offence and is liable—

- (a) on summary conviction, to a fine not exceeding €10,000 or to imprisonment for a term not exceeding 12 months, or to both, or 40
- (b) on conviction on indictment, to a fine or to imprisonment for a term not exceeding 2 years, or to both.

## SCHEDULE 1

### PUBLIC BODIES

1. Each of the following is a public body for the purposes of this Act:

- 5 (1) a Department of State, including any body, organisation or group specified in relation to that Department of State in the Schedule to the Ministers and Secretaries Act 1924,
- (2) the Office of the Attorney General,
- (3) the Office of the Comptroller and Auditor General,
- 10 (4) the Office of the Ombudsman,
- (5) the Houses of the Oireachtas Commission,
- (6) a local authority, for the purposes of the Local Government Act 2001,
- 15 (7) any body, organisation or group standing prescribed for the time being, with the consent of such other (if any) Minister of the Government as the Minister considers appropriate having regard to the functions of that other Minister of the Government, and being—
- (a) a body, organisation or group established—
- 20 (i) by or under any enactment (other than the Companies Acts 1963 to 2005) or any scheme administered by a Minister of the Government,
- (ii) under the Companies Acts 1963 to 2005, in pursuance of powers conferred by or under another enactment, and financed wholly or partly, whether directly or indirectly, by means of moneys provided, or loans made or guaranteed, by a Minister of the Government or the issue of shares held by or on behalf of a Minister of the Government,
- 25
- 30 (b) any other body, aforesaid, organisation or group financed as aforesaid,
- (c) a company (within the meaning of the Companies Act 1963) a majority of the shares in which are held by or on behalf of a Minister of the Government,
- 35 (d) any other body, organisation or group appointed by the Government or a Minister of the Government,
- (e) subject to *paragraph (2)*, any other body, organisation or group on which functions in relation to the general public or a class of the general public stand conferred by any enactment, or
- 40 (f) a subsidiary of a body, organisation or group specified in any of the foregoing provisions of this subparagraph.

2. A body, organisation or group standing prescribed pursuant to regulations for the purposes of clause (e) of *subparagraph 1(7)* is a public body only as respects functions referred to in that clause.

## SCHEDULE 2

### LOBBYISTS' CODE OF CONDUCT

#### Introduction

This Code of Conduct is founded on the following five concepts:

- free and open access to government is an important matter of public interest; 5
- lobbying public officials is a legitimate activity;
- it is desirable that public officials and the public be able to know who is attempting to influence government;
- a system for the registration of paid lobbyists should not impede free and open access to government; and 10
- a defined code of conduct for those professionally involved in public affairs and lobbying will serve to enhance the integrity and transparency of the democratic process.

The purpose of this Code of Conduct is to assure the public that lobbying is done ethically and according to high standards, with a view to conserving and enhancing public confidence and trust in the integrity, objectivity and impartiality of government decision-making. 15

In this code, “lobbying” means lobbying activities to which the *Registration of Lobbyists Act 2008* applies and “lobbyist” is to be interpreted accordingly. 20

#### Rules

##### Professionalism

Lobbyists must observe the highest professional and ethical standards. In particular, lobbyists must conform fully with not only the letter but also the spirit of this Code of Conduct as well as all relevant laws, including the *Registration of Lobbyists Act 2008* and its regulations. 25

If a lobbyist forms the opinion that either the objectives or the proposed means of promoting the objectives of his or her client or employer may be unlawful, or contrary to the provisions of this code of conduct, he or she is required to so advise the client or employer. In circumstances where this advice is not acted upon in the appropriate manner, the lobbyist must forthwith cease to act on behalf of the client or employer in that matter. 30 35

##### Transparency

###### *Identity and purpose*

Lobbyists shall, when making a representation to a public official, disclose the identity of the person or organisation on whose behalf the representation is made, as well as the reasons for the approach. 40

###### *Openness*

Lobbyists must, at all times, be open and frank about their lobbying activities, while respecting confidentiality.

### *Integrity and Honesty*

Lobbyists must conduct with integrity and honesty all relations with public officials, clients, employers, the public and other lobbyists.

### *Accurate information*

- 5 Lobbyists shall provide information that is accurate and factual to public officials. Moreover, lobbyists shall not knowingly mislead anyone and shall use proper care to avoid doing so inadvertently.

### *Disclosure of obligations*

- 10 Lobbyists shall indicate to their client or employer their obligations under the *Registration of Lobbyists Act 2008*, and their obligation to adhere to this Code of Conduct.

## **Confidentiality**

### *Confidential information*

- 15 Lobbyists shall not divulge confidential information unless they have obtained the informed consent of their client or employer, or the law requires disclosure.

### *Insider information*

- 20 Lobbyists shall not use any confidential or other insider information obtained in the course of their lobbying activities to the disadvantage of their client or employer.

## **Conflict of interest**

- 25 Lobbyists shall not represent conflicting or competing interests without the informed consent of those whose interests are involved. They must properly inform clients about any potential conflicts of interest, or of any competing interests arising from their professional practice or other business, family or social associations.

- 30 Lobbyists must, in all cases where any conflict of interest or potential conflict arises between their professional duties and their personal activities, give precedence to their professional responsibilities and, where necessary, either cease the relevant personal activity or withdraw from their professional duty.

## **Improper influence**

- 35 Lobbyists shall not place public officials in a conflict of interest or propose or undertake any action that would constitute an improper influence on a public official. They must not either offer or give, nor cause a client or employer to offer or give, any inducement or reward, direct or indirect, to any public official, agent of a public official or political party of which a public official is a member. They must act at all times in a professional, ethical and reasonable manner and must not bring unreasonable or undue pressure or influence to bear. All public officials should, at all times, be treated with courtesy and respect.