



Australian Government

Department of the Prime Minister and Cabinet

SECRETARY

DR MARTIN PARKINSON AC PSM

Mr Peter Costantini
Chief Executive, SAS Group
ICON Place
Level 8, 270 Adelaide Street
BRISBANE QLD 4000

Dear Mr Costantini

Thank you for updating your entity's details on the Australian Government Lobbyists Register (the Register) on 5 October 2017 as part of a regular update of information. I note you have removed four clients and revised some contact details.

Under the Lobbying Code of Conduct, the Register needs to contain the following information:

- (a) in the case of a person, company or organisation who conducts lobbying activities, or whose employees conduct lobbying activities on behalf of a client with a Government representative:
(ii) the names and positions of persons employed, contracted or otherwise engaged by the lobbyist to carry out lobbying activities.

In light of media reports on 30 September and 1 October 2017 about the SAS Group, I would be grateful if you could provide assurance that details of your lobbyists are complete and up to date and that SAS Group and its lobbyists continues to comply with the Code.

Yours sincerely

[Handwritten signature of Martin Parkinson]

9 October 2017

Senate F&PA Committee

Tabled Document

Inquiry: supplementary Budget estimate split D.C. 2017-18

Date/Time: 15 November 2017

Witness Name: Ms. Yaeli Lau, A/g. deputy secretary, Governance

Organisation: Department of the Prime Minister and Cabinet

11 October 2017

Dr Martin Parkinson AC PSM  
Secretary  
Department of Prime Minister and Cabinet  
PO Box 6500  
Canberra ACT 2600

Dear Dr Parkinson,

Thank you for your letter on 9 October 2017, in which you reference media reports relating to the SAS Group.

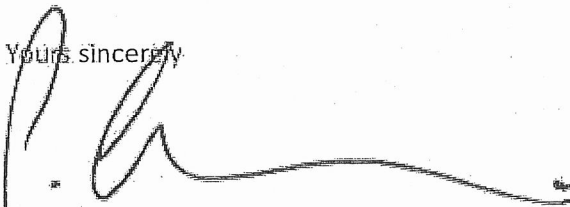
The SAS Group takes very seriously our responsibilities under the Lobbying Code of Conduct (the Code). The details contained within the Register of Lobbyists under Section 5.1(a)(ii) are complete and up to date, and I can assure you that the SAS Group and its lobbyists continue to comply with our obligations under the Code. We will, of course, continue regular updates to the register in future as necessary.

The SAS Group is a multi-faceted strategic communications agency, with lobbying representing only a small proportion of our work. Our directors and consultants use their expertise to assist clients with a broad range of corporate, policy, stakeholder, communications and media related matters. Most of our team are not engaged in lobbying activities as defined under the Code and are therefore not listed on the Register.

I note that neither the media reports to which you have referred, nor the protagonists quoted in those reports, have alleged any breach of the Code by the SAS Group or its personnel. The Directors have taken the decision that we will not dignify what we believe to be a personal political attack by responding to the media insinuation. However, should you wish us to address any specific detail or issue of concern, I am only too happy to assist you.

I understand and respect your duty to ensure compliance with the Code, and I thank you for your correspondence. I would appreciate if you are able, to provide confirmation that this written assurance assuages any concerns you may have.

Yours sincerely,



**PETER COSTANTINI**  
CHIEF EXECUTIVE OFFICER