

Company Name Royal Dutch Shell
Industry Extractives
UNGP Core Score (*) 20.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
2	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
2	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
20.5	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company states that they have the responsibility to society to 'To conduct business as responsible corporate members of society, to comply with applicable laws and regulations, to support fundamental human rights in line with the legitimate role of business, and to give proper regard to health, safety, security and the environment.' [Shell General Business Principles, 2014: shell.com] • Met: UNGC principles 1 & 2: The Company is a signatory to the UN Global Compact. [2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: OECD: The Company indicates on its website section 'Transparency', together with human rights, tax and anti-corruption, that it supports 'External voluntary codes': 'The Shell General Business Principles and Shell Code of Conduct guide the business activities of Shell companies. We also support a number of external voluntary codes [...] Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises'. [External voluntary codes, N/A: shell.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: The Company states: 'We are a founding member of the UN Global Compact and we also continue to support its corporate governance principles on human rights,...' . [Sustainability Report 2019, 07/04/2020: reports.shell.com] • Met: Explicitly list All four ILO apply to EX BPs: The Company states that the code of conduct applies to every employee, director and officer in every shell company. The Company also states 'Contract staff working for a Shell company must also follow the Code. Contractors and consultants who are agents of, or working on behalf of, or in the name of a Shell company (through outsourcing of services, processes or any business activity), are required to act consistently with the Code when acting on our behalf. Independent contractors and consultants must be made aware of the Code as it applies to their dealings with our staff. Where a Shell company has formally been designated the operator of a Joint Venture, that Shell company must apply the Code to the operation of the Joint Venture'. In addition, in its 'Supplier Principles' document', the Company indicates: 'We will develop and strengthen relationships with contractors and suppliers who are committed to the principles set out below or to similar standards through their own activities and the management of their own suppliers and sub-contractors.' Among the principles set out in the document: 'Contractors and suppliers conduct their activities in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO) including ensuring: no use of child labour; no use of forced, prison or compulsory labour; no payment of recruitment fees by workers; compliance with all applicable laws and regulations on freedom of association and collective bargaining; a safe, secure and healthy workplace and not tolerating discrimination, harassment or retaliation; compliance with all applicable laws and regulations on working hours; and providing wages and benefits that meet or exceed the national legal standards'. [Code of Conduct, 01/11/2015 & Shell Supplier Principles, 31/01/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company states in the modern slavery statement: 'Values and policies: We recognise our responsibility to respect human rights in all aspects of doing business and have embedded human rights in the Shell General Business Principles, Shell Code of Conduct, and the Shell Supplier

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			<p>Principles. Our approach is informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the core conventions of the International Labour Organization (ILO), which covers; freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in respect of employment and occupation.' However, the use of the expression 'informed by' does not represent a formal statement of commitment, according to CHRB wording criteria. On the other hand the Che Company states in its Sustainability Report 2019: 'We respect our employees' and contractors' rights by working in line with the International Labour Organization's core conventions and the UN Global Compact. Labour rights include freedom of association, the right to collective bargaining, non-discrimination and equal opportunity, conditions of work, adequate remuneration and freedom from forced labour and child labour.' However, the use of the expression 'in line with' does not represent a formal statement of commitment, according to CHRB wording criteria. The Company states in the 2016 Sustainability Report (2017, about to be outdated) 'We respect the principles of freedom of association, the right to collective bargaining, non-discrimination and equal opportunity, along with adequate work conditions, adequate remuneration and the elimination of forced or child labour.' However, it is important to note that the Company does not highlight a commitment since this report (at least collective bargaining). [MSA 2019, 17/03/2020: shell.com & Sustainability Report 2019, 07/04/2020: reports.shell.com]</p> <ul style="list-style-type: none"> • Met: Respect H&S of workers: The Code of Conduct sets out the Company's commitment to respect the health and safety of workers. The Company states 'Our aim is to achieve Goal Zero, with No Harm and No Leaks. We are committed to the goal of doing no harm to people and protecting the environment, while developing energy resources, products and services in a way that is consistent with these objectives. ' [Code of Conduct, 01/11/2015] • Met: H&S applies to EX BPs: The company states 'Every Shell company, contractor and joint venture under Shell operational control is required to have a systematic approach to the management of Health, Safety, Security, the Environment and Social Performance (HSSE&SP), designed to ensure compliance with the law and to achieve continuous performance improvement, while promoting a culture in which all Shell staff and contractors share this commitment'. In addition, its Supplier Principles document also states: 'Contractors and suppliers have a systematic approach to HSSE & SP management, designed to ensure compliance with all applicable laws and regulations and to achieve continuous performance improvement.' [Code of Conduct, 01/11/2015 & Shell Supplier Principles, 31/01/2019: shell.com]
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company discloses 'Our projects can have an impact on neighbouring communities where we operate. Therefore, we work with subject matter experts (SMEs) to understand the effects that a project may have on land, livelihoods and culture. We also engage with communities to understand their priorities and concerns. We work to mitigate any possible negative consequences of a project, working alongside our technical and commercial teams.' In addition the Company states ' respectful engagement with local communities is critical to the success of projects and long-term operations. We need to understand the priorities and address the concerns or grievances people may have'. [Supporting Local Communities, N/A: shell.com] • Met: Regular stakeholder engagement: In its Sustainability Report, the Company discloses information of its stakeholder engagement activities, such as: 'Engaging with communities is an important part of our approach to managing human rights and providing access to remedy. Community engagement helps us design better projects, comply with social and environmental regulations and align with international standards, including those from the World Bank and the International Finance Corporation.[...] [community coordinator for the North Mindanao Import Facility says:] "We adopted a collaborative approach involving stakeholders, such as the government agencies, non-governmental organisations and the village leaders. We established an efficient communication strategy to coordinate all the different activities. We engaged in public consultation, open dialogue and negotiations until we reached agreement on the new site and the resettlement plan." [...] We collaborate with governments, non-governmental organisations, industry bodies, national oil and gas companies and many other businesses. These collaborations range from working together on a project to sponsoring a particular group. Collaborating and engagement with these groups helps us in many different ways.

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			<p>It is a proven way to learn new things, share best practice, achieve specific objectives, set future goals and build trust with the stakeholders who have an interest in Shell.' [Sustainability Report 2019, 07/04/2020: reports.shell.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Regular stakeholder design engagement: See above. The Company also discloses 'Shell has dedicated in-house specialists who are experienced in engaging with communities, including indigenous peoples, managing impacts related to resettlement and livelihoods, and identifying and managing impacts on cultural heritage'. There is evidence that the Company regularly engages with stakeholders and their legitimate representatives. The Company provides the example of working with local communities in Colombia around safety concerns whilst fishing at sea. Additionally, the Company indicates in its Sustainability Report 2019: 'We manage the impact we may have on people living near our operations in line with the International Finance Corporation's Performance Standards and the UN Guiding Principles on Business and Human Rights. Our Health, Safety, Security, Environment and Social Performance Control Framework expects us to first avoid or, where this is not possible, minimise our impacts on people through project design. We work with local communities to jointly identify solutions and opportunities. [...] We engage with communities and other stakeholders to discuss projects. Their input helps us to design better projects, comply with relevant social and environmental regulations, and align with international standards. This includes standards from the World Bank and the International Finance Corporation'. [Supporting Local Communities, N/A: shell.com & Sustainability Report 2019, 07/04/2020: reports.shell.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company states 'We have community feedback procedures in place to enable people living close to our operations to raise concerns about the impacts of our activities and remedy any issues'. It also states in its Sustainability Report: 'Engaging with communities is an important part of our approach to managing human rights and providing access to remedy'. In addition, the Company reports about cases where it put in place actions to correct human rights issues, such as the case of the construction of the floating liquefied natural gas (FLNG) facility in South Korea where 'the local community was concerned about noise levels from the construction of the Prelude floating LNG plant. We responded by installing industrial silencers to reduce disturbance from the shipyard.[website section 'Working with communities]' or the fuel terminal in Cagayan de Oro - Philippines resettlement plan [website section 'Laying the foundations for new lives']. However, this indicator looks for a broader statment of commitment to remedy anyd adverse impact caused or contributed to. Current evidence seems to focus in providing remedy following specific concerns raised (commitment looks for any adverse impact caused or contributed to). [Human Rights, N/A: shell.com & Sustainability Report 2019, 07/04/2020: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts: In its 2018 Sustainability Report, the Company indicates: 'Recognising the impact suppliers can have on local communities where we operate, we have also expanded our social performance requirements. The updated supplier principles include the requirements for contractors to respect their neighbours, to manage the social impacts of their activities, to enhance local benefits, and to listen and respond honestly and responsibly to local communities – including responding to community feedback as a means of providing access to remedy.' However, the Suppliers Principles does not make a specific reference to remedy, only that suppliers must 'recognize that regular dialogue and engagement with stakeholders is essential. In interactions with employees, business partners and local communities, seek to listen and respond to them honestly and responsibly.' In addition, the Company discloses information of a spill case in Nigeria where 'The Shell Petroleum Development Company of Nigeria Ltd (SPDC), the operator of the SPDC Joint Venture (SPDC interest 30%), is run according to the same technical standards as other Shell companies globally. SPDC is working to eliminate spills from operational activities, remediate past spills and prevent spills caused by crude oil theft, sabotage of pipelines or illegal oil refining.' However, this case seems to be focus in environmental impacts. This indicator looks for evidence of commitment to work with business partners to remedy adverse impacts on human rights through the business partners' own mechanisms or through collaborating in the development of third party non-judicial remedies with them. [2018 Sustainability Report,

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			02/04/2019: shell.com & Sustainability Report 2019, 07/04/2020: reports.shell.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: The overall accountability for sustainability within Shell lies with the Chief Executive Officer (CEO) and the Executive Committee. This covers human rights, and the company commits to the core ILO. [Sustainability Governance, N/A: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The CEO is assisted by the health, safety, security, environment and social performance (HSSE & SP) executive team. The Corporate and Social Responsibility Committee (CSRC) was established in 2005. The Committee's role is to review and advise on policies and performance against the Shell General Business Principles, the Shell Code of Conduct and mandatory HSSE & SP standards. A human rights working group (HRWG) of experts co-ordinates its activities for human rights across the Company which is overseen by the HSSE SP Executive. [Human Rights, N/A: shell.com] • Met: Day-to-day responsibility for EX BRs: These committees and working groups oversee human rights issues with its extractive business partners as well as its own operations. [Human Rights, N/A: shell.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company states in its Sustainability Report 2019: 'We focus on four areas where human rights are critical to the way we operate: communities, security, labour rights and supply chains. [...] Human rights due diligence is embedded into our existing processes and frameworks, such as the Health, Safety, Security, Environment and Social Performance Control Framework.' In addition, in its Sustainability Report 2018, the Company describes that they consult with international organisations, companies and civil society to understand and respond to current and emerging human rights issues relevant to our business.' The Company also describes how they have collaborated with The Danish Institute of Human Rights, and in 2018 'provided insight into emerging human rights issues and advice on employee communications material, along with critical thinking and constructive challenge in discussions at our annual human rights meeting'. [Sustainability Report 2019, 07/04/2020: reports.shell.com & 2018 Sustainability Report, 02/04/2019: shell.com] • Met: identifying risks in EX business partners: In its modern slavery statement the Company states: 'Certain areas of our supply chain may pose a higher labour rights risk due to their location and the nature of the goods and services procured. Our risk assessment is a combination of both country and category risk. Supply chain country risk is derived from external indices provided by Verisk Maplecroft that indicate the potential for modern slavery risks. Supply chain category risk has been determined by analysis of typical contract work-scopes, identifying those such as branded merchandise and construction or maintenance services where there may be higher risks of unethical labour practices in the recruitment of migrant workers. We review our approach to improving our labour rights risk assessment in our supply chains'. [MSA 2019, 17/03/2020: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company conducts impact assessments when they plan new projects. The Company states that they 'We carry out detailed environmental, social and health impact assessments when planning major projects, [...].' These impact assessment cover human rights elements- such as indigenous peoples rights. The Company implements the VPSHR across Shell which covers security related human rights risk-identification process. The Company describes in its MSA 2019 how certain areas of their supply chain pose higher labour rights risks 'due to their location and the nature of the goods and services procured.' [Sustainability Report 2019, 07/04/2020: reports.shell.com & MSA 2019, 17/03/2020: shell.com] • Met: In consultation with stakeholders: The Company consults with 'civil society to understand and respond to current and emerging human rights issues relevant to our business.' No new relevant evidence found in latest revision. [2018 Sustainability Report, 02/04/2019: shell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: In consultation with HR experts: 'We have collaborated closely with the Danish Institute for Human Rights since 1999 to assess and improve our approach. In 2018, the institute provided insight into emerging human rights issues and advice on employee communications material, along with critical thinking and constructive challenge in discussions at our annual human rights meeting.' No new relevant evidence found in latest reports. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Triggered by new circumstances: As indicated above, process is conducted when planning new projects. [Sustainability Report 2019, 07/04/2020: reports.shell.com] • Met: Explains use of HRIAs or ESIA (inc HR): The Company conducts an environmental, social and health impact assessment for every major project. The Company states 'We carry out detailed environmental, social and health impact assessments when planning major projects, [...]'. These impact assessment cover human rights elements- such as indigenous peoples rights. [Sustainability Report 2019, 07/04/2020: reports.shell.com]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company has grouped their human rights risks in four key areas - 'communities, security, labour rights and supply chain'. It also indicates the following in the modern slavery statement: 'Certain areas of our supply chain may pose a higher labour rights risk due to their location and the nature of the goods and services procured. Our risk assessment is a combination of both country and category risk. Supply chain country risk is derived from external indices provided by Verisk Maplecroft that indicate the potential for modern slavery risks. Supply chain category risk has been determined by analysis of typical contract work-scopes, identifying those such as branded merchandise and construction or maintenance services where there may be higher risks of unethical labour practices in the recruitment of migrant workers. We review our approach to improving our labour rights risk assessment in our supply chains. We also review our approach to improving our labour rights risk assessment in our businesses. Following our assessment activities in 2019, we have started work to identify where labour rights controls or mitigations may be needed in our trading activities and our New Energies organisation. Our risk assessments are one of the tools we use to implement or improve risk-based controls if we identify any areas for improvement'. [Human Rights, N/A: shell.com & MSA 2019, 17/03/2020: shell.com] • Not met: Public disclosure of salient risks: According to its website section 'Human rights': 'We focus our efforts through four areas where human rights are critical to the way we operate, and where we have identified the risks are highest for potential impact on human rights: labour rights, communities, supply chain and security.' The Company discloses how they mitigate and assess human rights risks in these four categories, but do not publish a list of the risks that they consider salient within each of them. Although the Company identifies the priorities and concerns of local communities to prevent any possible negative consequences of a project, no further information of which are the specific salient human rights risks and impacts. [Human Rights, N/A: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met [Human Rights, N/A: shell.com]
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: The Company indicates: 'We assess and manage the potential social impact of all our projects as part of integrated environmental, social and health impact assessments.' ; 'Our Health, Safety, Security, Environment and Social Performance (HSSE&SP) Control Framework sets out how we identify, assess and manage our impacts on communities where we operate - including any impact on human rights - and how we engage respectfully with our neighbours.' No new relevant evidence found in latest revision. [2018 Sustainability Report, 02/04/2019: shell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Including amongst EX BPs: The Company describes how they work with suppliers and contractors to help them understand how to close the gaps between the Company's policies (covering human rights) and their own processes. The Company also has a set of criteria to identify potential supply chain risks, and where they see risk, they ask suppliers to undertake due diligence assessments prior to the award of a contract. The Company states 'we may work with suppliers and contractors to help them understand how to close these gaps, implement corrective action – which may include on-site audits from Shell – or we may consider terminating the contract.' No new relevant evidence found in latest revision. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Example of Actions decided: The Company describes an example of improving on-site and off-site wellbeing and recruitment practices after identifying this as a potential area for improvement. The Company describes: 'An element of this included building awareness of worker welfare and the correlation to increased performance in safety, productivity, quality and retention with government and local industry bodies. Several changes have been made, including in on-site and off-site infrastructure, fatigue management, and transport, all done with a strong voice from the workers themselves'. No new relevant evidence found in latest revision. [Shell Sustainability Report 2017, 2018: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: As above.
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: System to check if Actions are effective: The Company states 'We have collaborated closely with The Danish Institute of Human Rights since 1999 to assess and improve our approach. In 2017, the institute developed an analysis to help us improve our transparency, advised us on industry benchmarking, and supported us to strengthen the application of internal metrics in some of our key areas.' No new relevant evidence found in latest revision. [Shell Sustainability Report 2017, 2018: reports.shell.com] • Met: Lessons learnt from checking effectiveness: The Company states 'We investigate all incidents and aim to learn from them. Since 2014, around 100,000 employees and contractors have taken part in learning sessions. The sessions focus on how an incident with a potential safety risk could have been prevented and teach participants how to apply the lessons learned in their line of work.' The Company utilises the example of Nigeria, and how they are working to reduce health and safety incidents there. No new relevant evidence found in latest revision. [Shell Sustainability Report 2017, 2018: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: See indicator B.2.1 • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Met: Comms plan re action plans for risks: See B.2.3 • Met: Comms plan re reviewing action plans: See B.2.4 • Not met: Including EX business partners: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Responding to affected stakeholders concerns: The Company discloses information on its website about how it responded to local community concerns about how the Company would restore an area used for drilling wells: 'Shell started to drill appraisal wells in Jinjia back in 2010, but decided to exit six years later due to challenging geology. "Villagers living around our well site were not concerned whether the well was technically or economically successful," says Bill Li, who led Shell's work with the community in Jinjia. "What was important to them was they could harvest again from the land that would be returned." After extensive consultation with land owners and local authorities on how best to restore the site, Shell began by planting vegetables, including green beans. The roots of the beans lock nitrogen in the soil to increase the fertility of land. This helped the local population - made up mainly of elderly people, women and children - to more easily reap an early harvest. We also reused top soil from ponds dug for fish farming, an additional source of income for villagers.' In addition, it also discloses information in its website section 'Respecting our neighbours' about how it engaged with local communities to find a solution to minimise the noise in the construction of a floating liquefied natural gas (FLNG) facility in South Korea built by its contractors Technip Samsung Consortium (TSC). [Farming for future generations, N/A: shell.com & Respecting our neighbors, N/A: shell.com] Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company has a third-party operated grievance mechanism for reporting and addressing 'suspected violations of the law or the Shell General Business Principles (SGBP) is of critical importance in protecting our reputation and the value of the Shell brand.' The Shell General Business Principles covers human rights. The Helpline is available to customers, suppliers, partners, advisors and employees of Shell. The Company reports that 100% of the countries that the company operates in has staff access to a grievance procedure, staff forum or other support system. [Global Helpline, N/A: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: The Company reports: 'Internal investigations confirmed 263 substantiated breaches of the Code of Conduct in 2019 compared with 370 in 2018. As a result, we dismissed or terminated the contracts of a total of 93 employees and contract staff, compared with 92 in 2018. Most Code of Conduct violations related to harassment, conflicts of interest and protection of assets'. However, It is not clear how many of these are human rights specific. [Sustainability Report 2019, 07/04/2020: reports.shell.com] Met: Channel is available in all appropriate languages: The Shell Global Helpline is available in 14 different languages. [Global Helpline, N/A: shell.com] Met: Expect EX BPs to have equivalent grievance system: In its 'Supplier Principles' document, the Company states: 'Contractors and suppliers should provide workers with a dedicated whistle-blowing mechanism where grievances related to below topics can be logged confidentially'. In addition, in its Annual Report 2019, the Company indicates: 'We expect joint ventures not operated by Shell to apply standards and principles similar to our own. We support these joint ventures in their implementation of our HSSE & SP Control Framework, or of a similar framework, and offer to review the effectiveness of their implementation. Even if such a review is not carried out, we periodically evaluate HSSE & SP risks faced by the ventures which we do not operate. If one of these joint ventures does not meet our expectations, we work to put remedial action plans in place, in agreement with our partners, to improve performance'. [Shell Supplier Principles, 31/01/2019: shell.com & Annual Report 2019, 2020: https://shell.com] Not met: Opens own system to EX BPs workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Grievance mechanism for community: The Royal Dutch Shell Global Helpline allows employees and stakeholders to raise concerns and report instances of potential non-compliance with Shell's principles. The Company states that 'The Global Helpline is for all employees and contract staff in Shell and for third parties with whom Shell has a business relationship (such as customers, suppliers, agents) if they observe wrongdoing by a Shell company or employee. [...] Our Global Helpline allows employees and stakeholders to raise concerns and report instances

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		<p>of potential non-compliance with our values and principles'. [Global Helpline, N/A: shell.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Company states: 'The Global Helpline is available 24 hours a day, 365 days a year. Calls and reports over the Helpline are received on behalf of Shell by an independent third party specialist Helpline provider.' There are two ways to submit a report: 1. Global Helpline website: You can fill in a form to submit your query or concern. The website is available in 14 languages, including English, and is available to third parties as well as Shell employees; 2. Global Helpline in your country: You can call the helpline without a charge, from any country in which Shell operates. If requested an interpreter can be brought into the call to assist the English-speaking interviewer. If a prompt for the required language is not heard, say the name of the required language when you connect to the interviewer. [Global Helpline, N/A: shell.com] • Met: Expects EX BPs to have community grievance systems: The Company states that Joint Venture companies not under Shell control are encouraged by Shell to adopt similar principles and standards. [Code of Conduct, 01/11/2015] • Met: EX BPs communities use global system: The Global Helpline allows employees and stakeholders to raise concerns and report instances of potential non-compliance with Shells principles. The Shell Code of Conduct states that 'Contractors or consultants who are our agents or working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with the Code when acting on our behalf. Independent contractors or consultants will be made aware of the Code as it applies to our staff in their dealings with them.' [Code of Conduct, 01/11/2015]
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The Company discloses information about the North Mindanao Import Facility were remedy was provided: 'The North Mindanao Import Facility, Shell's largest terminal in the southern Philippines, resettled 83 informal settlers due to noise from the facility's fire-water reservoir and the expansion of the port authority's berthing area. The facility worked with local government and nongovernment organisations to provide housing and compensation. Work to restore peoples' livelihoods was ongoing in 2019; and an independent review found that resettled families were adjusting well'. [Sustainability Report 2019, 07/04/2020: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Met: Evaluation of the channel/mechanism: According its Sustainability Report 2019: 'In 2019, Shell developed a tool to check if our community feedback mechanisms were fully effective according to the UN Guiding Principles. The tool was used to assess where additional support was needed and laid out plans for improvements in 2020.' In addition, in its Sustainability Report 2017 it indicates: 'We conducted a full evaluation of our online community feedback tool to understand how it has been used across our projects and facilities. Following the evaluation, we identified a number of areas for improvement, which are now being considered to enhance the tool. We developed the CFM self-check to assess the effectiveness of the mechanism based on UN Guiding Principles and Human Rights criteria for implementation in all major facilities and projects'. No new relevant evidence found in latest revision. [Shell Sustainability Report 2017, 2018: reports.shell.com & Sustainability Report 2019, 07/04/2020: reports.shell.com]

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Niger Delta oil spills • Area: Environmental damage • Story: The Shell Petroleum Development Company of Nigeria Limited (SPDC) has been criticised for frequent oil spills in the Niger Delta, which have caused serious damage to the environment, human health and livelihoods. In November 2013, Amnesty International (AI) and the Centre for Environment, Human Rights and Development (CEHRD) published a report entitled 'Nigeria: Bad information: Oil spill investigations in the Niger Delta' that alleged specific cases in which the SPDC joint venture had falsely reported the cause of oil spills, the volume of oil spilt, or the extent and adequacy of clean up measures or compensation. In June 2014, a ruling by the London Technological and Construction Court ruled that where there are inadequate systems in place, the Company would be responsible for the resulting pollution caused by criminals. In January 2015, it was reported in the press that the Company had agreed to pay approximately USD 80m (GBP 55m) to compensate a Nigerian community for the two spills in 2008 and 2009. GBP 35m was to be split between individual villagers and GBP 20m would go to the Bodo community to build health clinics and refurbish schools. In 2017, Shell tried to strike out the lawsuit alleging that some members of the community had obstructed the clean up. The Court dismissed the claim. Later that year the company sought to prevent the community from going back to court by requesting to include a clause in the settlement, according to which any disruptive act by any resident of the Bodo community would lead to termination of the lawsuit. However, on 24 May 2018, a UK judge ruled that the Bodo community should retain the right to revive the claim for another year with no conditions attached, in the event of the clean-up not be completed to an adequate standard. During 2018, allegations related to these operations remained ongoing: Amnesty International exposed evidence that Shell and Eni were taking weeks to respond to reports of spills and publishing misleading information about the cause and severity, which may result in communities not receiving compensation. Similarly, the Nigerian Times reported that members of Bakiri community, in the area of Bayelsa State, conducted a demonstration against the alleged neglect by Shell Petroleum Development Company (SPDC), accusing the company of neither sending relief materials nor a medical team to care for the health challenges posed by an incident that took place in May 2018. It is reported that the oil spill occurred along the 24 inch Trans-Ramos pipeline of SPDC and had affected communities in Bayelsa and Delta states and that over 50 fishing settlements had been destroyed by the spill. During 2018, Nigerian Court ruled that Shell Nigeria Exploration and Production Company Limited, is liable to a USD 3.6 bn fine levied on it by the National Oil Spill Detection and Response Agency (NOSDRA) over a 2011 crude oil spill offshore on Nigeria's coastline; "Shell Nigeria Exploration and Production Company says court judgment on 3.6 billion dollars fine for the December 20, 2011 oil spill in parts of Niger Delta is not binding. Shell had approached the courts to challenge the powers of National Oil Spills Detection and Response Agency to impose fines on it." On July 24, 2019, the press reported that the Supreme Court in London will hear an appeal by Nigerian farmers and fishermen from Bille and Ogale communities, which allege they have suffered from decades of pollution, to pursue claims in England against Shell over oil spills in the Niger Delta. According to the press, the decision to hear the appeal re-opens the possibility for British multinationals to be held liable at home for their subsidiaries' actions abroad came after a London court ruled that the claim could not be pursued in England in February 2018. • Sources: [Amnesty International, 07/11/2013 -: amnesty.org][Premium Times, 24/07/2019: premiumtimesng.com][The Independent, 16/03/2018: independent.co.uk][Amnesty International, -: amnesty.org]
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: See below [Amnesty Report on Niger Delta, 2013: https://www.amnesty.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The Company has responded publicly to the allegation. <p>In January 2011 at a hearing in The Hague the Company said about 70% of oil spills averaged over the previous five years were caused by sabotage while the remainder could be blamed on SPDC; 80% of 2010 spill volume was due to sabotage and theft.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>In response to the 2013 AI report, a Shell spokesman said: 'SPDC firmly rejects unsubstantiated assertions that they have exaggerated the impact of crude oil theft and sabotage to distract attention from operational performance. We seek to bring greater transparency and independent oversight to the issue of oil spills, and will continue to find ways to enhance this. These efforts include publishing spill data online since January 2011 and working with Bureau Veritas, an independent third party, to find ways to improve the immediate response to a spill. It must be emphasised that the joint investigation process is a federal process that SPDC cannot unilaterally change, involving as it does representatives of regulatory bodies, the ministry of environment, the Nigerian police force, state government and impacted communities.'</p> <p>In terms of compensation, SDPC welcomed the January 2015 compensation agreement as a resolution of the case but blamed oil thieves for most of the many spills that occur every year in the delta.</p> <p>It has provided detailed information on each spills (including volume) in the recent years but does not respond to each allegations, namely those related to 'wrongly reporting the cause of oil spills, the volume of oil spilt, or the extent and adequacy of clean up measures'. The report also alleged systemic weaknesses in the way the cause of a spill and the volume are determined, with some significant errors in the volumes that are recorded as spilt', related to the effects of the spills on local livelihood and human health, etc. [Amnesty Report on Niger Delta, 2013: https://amnesty.org]</p>
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company states that 'we are committed to protecting the environment and respecting our neighbours.' [Environmental management, N/A: shell.com] • Met: Policies apply to the type of business relationships involved: In its sustainability report it states that 'Shell joint venture representatives and the Shell-appointed member(s) of the joint venture's board expect our partners to adopt the Shell commitment and policy on health, safety, security, environment and social performance (HSSE&SP) or one materially equivalent to our own. They are also expected to put in place standards to adequately address HSSE&SP risks.' [2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company has a commitment to preventing spills and leaks of hazardous materials and they state: 'we work hard to make sure our facilities are well designed, safely operated and appropriately inspected and maintained. We invest in the equipment and human expertise we need to deal with any spills that happen' [Environmental management, N/A: shell.com]
E(1).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: The company's previous engagement with the Bodo community along with the Corporate and Social Responsibility Committee (CSRC) of the board exploratory visit to the Niger Delta is sufficient to achieve this indicator. According to the company, "The CSRC conducted two major site visits in 2018. In February, the committee visited Nigeria, where over three days it met with Shell staff, government officials, and representatives from local non-governmental organisations to gain a deeper understanding of operations in the Niger Delta." Additionally, the company states that during site visits, the CSRC members "talk with local management, front-line staff and a wide range of stakeholders to gain a sense of how Shell's standards are being applied in practice.". Most recently, the company works to monitor the biodiversity remediation in 4 sites. It is done in collaboration with the IUCN and an advisory group which includes local experts. [2018 Sustainability Report, 02/04/2019: shell.com & SPILL RESPONSE & PREVENTION IN THE NIGER DELTA, 2020: shell.com.ng] • Met: Encourages linked business to engage affected stakeholders [2018 Sustainability Report, 02/04/2019: shell.com] • Not met: Provides remedies to affected stakeholders: IN one of the cases, the SPDC agreed to pay for the clean up following a court case. However, at a later stage, they attempted to prevent the community from pursuing legal action if the clean-up was not performed to an adequate standard. Therefore it cannot be considered to provide remedy satisfactory to the victims. Court cases are ongoing in the UK and in the Netherlands therefore, CHRB cannot award points for remedy to stakeholders.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Has reviewed management systems to prevent recurrence: The company states that it is implementing its 'ongoing work programme to appraise, maintain and replace key sections of pipelines and flow lines' in order to reduce operational spills. In its report on its work in the Niger Delta, the Company describes its actions to prevent spills and to remediate the situation. [2018 Sustainability Report, 02/04/2019: shell.com & SPILL RESPONSE & PREVENTION IN THE NIGER DELTA, 2020: shell.com.ng] Score 2 • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders: See above [2018 Sustainability Report, 02/04/2019: shell.com]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Pakistan orders Shell to pay USD 2.4 million following tanker fire that killed 218 people • Area: Health and safety • Story: In June 2017 A tanker contracted by Royal Dutch Shell's Pakistan subsidiary exploded killing more than 200 people. On July 7, 2017, Pakistan ordered Shell Pakistan to pay at least USD 2.4 million in compensation to victims of the accident. The tanker crashed on a main highway in central Punjab province while carrying some 50,000 litres of fuel from Karachi to Lahore. It exploded minutes later, sending a fireball through crowds from a nearby village who had gathered to scavenge for the spilled fuel, despite warnings by the driver and police to stay away. According to media reports, the Pakistan Oil and Gas Regulatory Authority (OGRA) found Shell Pakistan responsible for the accident. The OGRA's investigation reportedly found that Shell never checked if the private tanker it had hired complied with safety standards. The report said that Shell had informed the authority previously that its lorries met technical standards and that they upgrade contracted vehicles, but the tanker involved in accident had four axles instead of the five recommended to carry such a load. The report also claimed the tanker's fitness certificate was "fake", and that Shell Pakistan "failed to provide the pre-loading checklist". It lambasted Shell Pakistan's emergency response as "casual". • Sources: [Reuters - 07/07/2017: reuters.com][Shell's website: shell.com]
E(2).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: See below [2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The Company reports in a detailed way on its position to the case. Following the accident Jawwad Cheema, Managing Director Shell Pakistan stated on the company's website: 'We were extremely shocked and saddened to learn of the devastating road-tanker fire near Bahawalpur. Our hearts go out to the families of the victims and our prayers are with the injured. The tanker is owned by Marwat Enterprises which was transporting fuel from the Shell Oil Terminal in Kemari, Karachi to Vihari. Shell Pakistan has mobilised resources and is working with the authorities to assist the local emergency teams and will cooperate fully with subsequent investigations. Road safety is a priority at Shell and we have already started our own investigation into the cause of the incident'. In response to questions by AFP, a Shell Pakistan spokesperson said that the Company was still investigating the incident. "Shell Pakistan is presently reviewing the Oil and Gas Regulatory Authority Investigation report in detail. It would be unhelpful to speculate on factors that may have contributed to the incident whilst other investigations are still ongoing, but we respect the role of the regulator and will consider the report as we cooperate with investigations by authorities and as we conduct our own investigation," the spokesperson said. In Shell's 2018 Sustainability Report, the company reports the following: In June 2017, a devastating roll-over incident occurred in Pakistan involving a road tanker hired by a company that was providing road transport services to Shell Pakistan Limited, following which people from a nearby village approached the incident site to collect spilled fuel. Tragically, the fuel ignited resulting in the loss of more than 200 lives and left many other people seriously injured." [2018 Sustainability Report, 02/04/2019: shell.com]
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Code of Conduct sets out the Company's commitment to respect the health and safety of workers. The Company states 'Our aim is to achieve Goal Zero, with No Harm and No Leaks. We are committed to the goal of doing no harm to people and protecting the environment, while developing energy resources, products and services in a way that is consistent with these objectives.' [Code of Conduct, 01/11/2015]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: The Code of Conduct states that human rights policy, which covers health and safety, applies to extractive business partners. [Code of Conduct, 01/11/2015] Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company provides qualitative information on fatalities, injury rates and accident rates. [2018 Sustainability Report, 02/04/2019: shell.com]
E(2).3	The Company has taken appropriate action	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Engages with affected stakeholders [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Encourages linked business to engage affected stakeholders: Shell has engaged with affected stakeholders following the accident in Jawwad Cheema. The company reports: "Shell Pakistan Limited provided immediate relief support including providing food supplies for 150 affected families for nine months and medical supplies to hospitals. Shell Pakistan Limited has also contributed to long-term relief efforts for those impacted. For example, the CARE Foundation, in partnership with Shell Pakistan Limited, has 'adopted' two public schools within the impacted villages to improve infrastructure and education standards. Shell Pakistan Limited is also working with the National Rural Support Programme to help restore livelihoods of people in affected communities, providing vocational training and support for setting up small businesses." [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Provides remedies to affected stakeholders: In 2017 the Pakistan Oil and Gas regulatory authority ordered Shell to pay Rs258.5 million as fine & compensation for affected families of oil tanker accident. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Has reviewed management systems to prevent recurrence: The company has reviewed its management systems relevant to the allegation. The company states: "We finalised our internal investigations in 2018 and we continue to implement our learnings from the incident. This includes deep reflection by the Royal Dutch Shell plc Board and Executive Committee, who have initiated several improvement programmes to be adopted throughout Shell globally. We have developed and started the implementation of a road transport improvement project, specifically targeted at the management of fuel transport in high-risk countries. We are working with road transport companies in other locations where factors relevant to the Pakistan incident may exist and have also started sharing what we have learned with others in the fuel transport industry." Additionally, the company states "Shell Pakistan Limited continues to work with regulators, emergency services and the wider oil and gas industry in Pakistan with a view to improving safety standards. Shell Pakistan Limited has also required the road transport companies it hires to improve the safety of their transport fleets and has ongoing safety engagements with hauliers and their drivers, seeking to help them to identify and address the risks associated with driving fuel tankers. This has included emergency response drills to build and test capability." [2018 Sustainability Report, 02/04/2019: shell.com] Score 2 <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: In 2017 the Pakistan Oil and Gas regulatory authority ordered Shell to pay Rs258.5 million as fine & compensation for affected families of oil tanker accident. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Has improved systems and engaged affected stakeholders: See above [2018 Sustainability Report, 02/04/2019: shell.com]
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Shell continues to face allegations over precarious work in Nigeria • Area: Forced Labour & FoA &CB • Story: On October 24, 2018, IndustriALL published a report following an investigation into the exploitation of contract workers at Royal Dutch Shell oil and gas operations in Nigeria. According to the report there were allegations over poverty wages, including some workers not paid by contract companies for several months, abuse through contracts, fundamental rights violations, poor healthcare and health and safety hazards. Additional reports include forcing employees to sign documents saying they will not join a union or ask for a pay rise. • Sources: [Business and Human Rights Resource Centre - 05/11/2018: business-humanrights.org][IndustriALL - 24/10/2018: industrial-union.org][IndustriALL - 24/10/2018: industrial-union.org]
E(3).1	The Company has responded	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available [shareholder webchat, 13/05/2020: shell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	publicly to the allegation		<p>Score 2</p> <ul style="list-style-type: none"> Met: Response goes into detail: In a transcript of a shareholder webchat, the company's CEO explain their response to the allegations in detail following a question from a representative of IndustriALL. The response relates to health care, union membership and health and safety. [shareholder webchat, 13/05/2020: shell.com]
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company policies address the general issues raised: The company states: "Shell is committed to respecting human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization core conventions. Our human rights approach is informed by the UN Guiding Principles on Business and Human Rights and applies to all of our employees and contractors." [Sustainability - Our Approach, N/A: shell.com & Human Rights, N/A: shell.com] Met: Policies apply to the type of business relationships involved: The company's policies apply to all employees and contractors. [Code of Conduct, 01/11/2015] <p>Score 2</p> <ul style="list-style-type: none"> Met: Policies address the specific rights in question: Shell states that the company focuses on four key areas of human rights, including labour rights and supply chain. It states: "We respect our employees, contractors and supply chain workers' rights by working in line with ILO conventions and the UN Global Compact." The company also states "This Code applies to every employee, director and officer in every Shell company. Contract staff working for a Shell company must also follow the Code. Contractors and consultants who are agents of, or working on behalf of, or in the name of a Shell company (through outsourcing of services, processes or any business activity), are required to act consistently with the Code when acting on our behalf. Independent contractors and consultants must be made aware of the Code as it applies to their dealings with our staff. Where a Shell company has formally been designated the operator of a Joint Venture, that Shell company must apply the Code to the operation of the Joint Venture." The code states "Shell will not tolerate any form of retaliation directed against anyone who raises a concern in good faith about a possible violation of the Code. In fact, any act or threat of retaliation against Shell staff will be treated as a serious violation of our Code." [Code of Conduct, 01/11/2015 & Sustainability - Our Approach, N/A: shell.com]
E(3).3	The Company has taken appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Denies allegations, but has engaged affected stakeholders: In the 2020 Shareholder Webchat, the company vehemently denied all the allegations raised by IndustriAll. According to the company's CEO, Shell has exchanged letter and has been in contact with IndustriAll over the allegations. The CEO said the following: 'We have investigated them thoroughly, and we have found on each and every one of the allegations that they were fully unsubstantiated. I hope you will recognise that we have responded to IndustriALL with very detailed information, we have done so in a very timely manner and we have done so also with very country specific outcomes of the investigations that we have conducted on the basis of your allegations.' [Shell Nigeria September 2018 Mission report, Sept 2018: industrial-union.org & shareholder webchat, 13/05/2020: shell.com] Met: Denies allegations, but reviewed systems to prevent such impacts: As explained above, Shell investigated its systems in light of the allegations but it claimed that all the allegations are biased and therefore didn't need to change its systems [shareholder webchat, 13/05/2020: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Denies allegations, but implements review recommendations: As explained above, Shell investigated its systems in light of the allegations but it claimed that all the allegations are biased and therefore didn't need to change its systems Not met: Denies allegations, and ensures systems prevent such impacts: As explained above, Shell investigated its systems in light of the allegations but it claimed that all the allegations are biased and therefore didn't need to change its systems
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> Headline: Argentina: Toxic waste from fracking in Patagonia Area: Environmental damage Story: December 17, 2018, An investigative report by Greenpeace reported that its Andino team investigated the impacts of the oil and gas developments in northern Patagonia, an area where the indigenous group the Mapuche live. The report claimed that Royal Dutch Shell, Total and other companies were involved in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>illegal dumping of highly toxic oily sludge waste at various sites in the region. One of the alleged illegal waste ponds was estimated to cover an area of 6.3 to 13.6 Hectares of land and is located 6km north of the town Anelo. According to the report, the wastes are hazardous and can cause damage, directly or indirectly to living beings or contaminate the soil. The report says that a local whistleblower provided Greenpeace with video evidence of the dump site, with a subsequent investigation by the organisation claiming to have tracked the trucks dumping the waste to two sites, one operated by Royal Dutch Shell and the other by Total. In May 2019, it was published in local news sources that the local authorities took soil samples and according to Treater "The results of the soil samples taken by the experts of the Environmental Prosecutor's Office on the company's premises show that all the parameters analyzed are below the limits regulated by current environmental regulations". However, some of Greenpeace's claims relate to other issues like proximity to houses.</p> <p>• Sources: [Latin America Bureau - 11/03/2019: lab.org.uk][Greenpeace - 17/12/2018: greenpeace.org.ar][France 24 - 17/12/2018: france24.com][Vaca Muerta News - 28/05/2019: vacamuertanews.com]</p>
E(4).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <p>• Not met: Public response available: In its response to the CHRB, the company says that it responded with a letter directly to Greenpeace Argentina Chile y Colombia, however the details of that letter are not public. Additionally the company says that the allegation was addressed by CEO Ben van Beurden at the company AGM in May 2019, however there is no publicly available evidence of this statement. Treater has also issued a press release which states that the local authority taken soil samples. However, CHRB requires that the company itself (i.e. Royal Dutch Shell) will respond to the allegation. [Latin America Bureau article, 11/03/2019: lab.org.uk]</p> <p>Score 2</p> <p>• Not met: Response goes into detail: The company says that it responded with a letter directly to Greenpeace Argentina Chile y Colombia, however the details of that letter are not public. [Latin America Bureau article, 11/03/2019: lab.org.uk]</p>
E(4).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <p>• Met: Company policies address the general issues raised: The company states that it is committed to protecting the environment and that it conducts detailed assessments of the potential environmental, social and health impacts when it plans new projects. [Environmental management, N/A: shell.com & Impact Assessments, N/A: shell.com]</p> <p>• Met: Policies apply to the type of business relationships involved: The company says that "The [environmental] standards apply to every Shell company and to joint ventures where we are the operator. We encourage partners in joint ventures we do not operate to apply our standards." [Environmental management, N/A: shell.com]</p> <p>Score 2</p> <p>• Not met: Policies address the specific rights in question: Although the company states that "We assess and carefully manage the risks of potential soil and groundwater contamination. We conduct scientific research on the behavior and potential risks of contamination from petroleum activities and share our findings with government agencies, researchers and other stakeholders to support the development of environmental guidelines," it is not a participant in the UN Global Compact CEO Water Mandate and does not state that it recognises water and a human right. [Data - Sustainability Report 2019, 04/2020: reports.shell.com & Environmental management, N/A: shell.com]</p>
E(4).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <p>• Met: Denies allegations, but has engaged affected stakeholders: In its 2018 Sustainability report the company says "In 2018, we held extensive engagement sessions with indigenous people, local farmers, and nearby communities in the Vaca Muerta shales basin in Neuquén, Argentina. This included training programmes for local community members interested in joining the industry and a programme that promoted livestock production and farming, and helping local farmers gain better access to water. Through this outreach, we have managed to develop strong relationships with the community in the basin, avoiding impact on other people and disruption to our activities" [2018 Sustainability Report, 02/04/2019: shell.com]</p> <p>• Not met: Denies allegations, but reviewed systems to prevent such impacts: Treater has denied that the pollution happened and has been quoted saying that</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>following the local authorities soil sample, it has been proven that the company meet the environmental standards. [Working with us, N/A: shell.com & New story on soil samples in Treater Site in Argentina., 28/05/2019: vacamuertanews.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: There is no evidence that Treater has implemented a review. [New story on soil samples in Treater Site in Argentina., 28/05/2019: vacamuertanews.com] • Not met: Denies allegations, and ensures systems prevent such impacts: There is no evidence that Treater has ensured system to prevent such occurrences. [New story on soil samples in Treater Site in Argentina., 28/05/2019: vacamuertanews.com]

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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