

Company Name Royal Dutch Shell
Industry Extractives
Overall Score (*) 57.1 out of 100

Theme Score	Out of	For Theme
4.8	10	A. Governance and Policies
18.1	25	B. Embedding Respect and Human Rights Due Diligence
7.1	15	C. Remedies and Grievance Mechanisms
9.4	20	D. Performance: Company Human Rights Practices
11.3	20	E. Performance: Responses to Serious Allegations
6.5	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note that Occidental Petroleum and Anadarko Petroleum merged as the assessment process was taking place and as such most of the assessment is based on pre-merger reporting by Occidental Petroleum.

Please note also 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 2019 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	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: 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: s03.static-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"> Not met: UNGPs: The Company states in the sustainability report: 'We recognise our responsibility to respect human rights in all aspects of doing business. [...] Our approach applies to all our employees and contractors and is informed by the Universal Declaration of Human Rights, the core conventions of the International Labour Organization, and the United Nations Guiding Principles on Business and Human Rights'. However, the use of the expression 'informed by' is not considered a formal statement of commitment according to CHRB wording criteria. [2018 Sustainability Report, 02/04/2019: shell.com] Not met: OECD

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 that 'As a founding member of the UN Global Compact, we also continue to support its corporate governance principles on human rights, environmental protection, anti-corruption and better labour practices'. [2018 Sustainability Report, 02/04/2019: 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 that: 'Our values and policies are informed by the Universal Declaration of Human Rights and the core conventions of the International Labour Organization 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. The Company states in the 2016 Sustainability Report '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 this neither in 2017 Sustainability Report nor 2018 report (at least collective bargaining). [2018 Modern Slavery Statement, 22/05/2019: shell.com] • 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.1.3.EX	Commitment to respect human rights particularly	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: Voluntary Principles (VPs) participant: The Company is a VPs participant, and publishes an annual report to the VPs detailing their implementation of the VPs in

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry (EX)		<p>their operations. [VPSHR – Overview of Shell’s implementation in 2018, 2019: shell.com]</p> <ul style="list-style-type: none"> • Met: UN Declaration on the Rights of Indigenous People (UNDRIP): The Company states 'In some countries, for example in Canada, Australia, Bolivia and Philippines, indigenous peoples hold specific rights recognised by law that protect their cultures and ways of life. In line with Shell’s General Business Principles, and in support of the UN Declaration on the Rights of Indigenous Peoples, our approach is to continue seeking the support and agreement of indigenous peoples potentially affected by our projects.' [Working With Communities, 05/07/2018: shell.com] • Not met: Expects BPs to respect these rights: In its Sustainability Report, the Company indicates: 'We do not have direct control over how these ventures embed sustainability in their operations but seek instead to exert a positive influence on their operations and offer our support. For instance, our 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.' In addition, in its latest VPSHR Report, the Company states that it implemented the VP approach in its joint venture operation in Iraq centre on the Basrah Gas Company (BGC). However, it is not clear if it expects from business partners both respecting indigenous rights and commit to the Voluntary Principles (or using security providers who are members of the International Code of Conduct of Private Security Providers Association). [2018 Sustainability Report, 02/04/2019: shell.com & VPSHR – Overview of Shell’s implementation in 2018, 2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC commitment: The Company discloses 'We recognise the principle of free, prior and informed consent (FPIC), as interpreted by the International Finance Corporation Performance Standards, as a safeguard for indigenous peoples’ rights.' The Company states in its 2018 sustainability report: 'Our activities in certain parts of the world affect indigenous peoples who hold specific rights for the protection of their cultures, traditional ways of life and special connections to land and water. Shell has developed a public position statement on Free Prior Informed Consent (FPIC), a principle recognised in the United Nations Declaration on the Rights of Indigenous Peoples. Our statement is based on a prerequisite to engage in dialogue with local indigenous communities and come to a joint agreement on the way forward in project development'. [Working With Communities, 05/07/2018: shell.com & 2018 Sustainability Report, 02/04/2019: shell.com] • Not met: Voluntary Guidelines on Tenure Rights [Shell General Business Principles, 2014: s03.static-shell.com] • Met: IFC performance standards: On the Company website the Company discloses 'When we work with local communities, we use international standards as our benchmark, including the International Finance Corporation’s Environmental and Social Performance Standards – as well as our own standards. We develop a social performance plan for all our major projects and assets, which includes a summary of our impact assessment findings.' [Working With Communities, 05/07/2018: shell.com] • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to commit to all these rights: Although the General Business Principles and the Supplier Principles include provisions related to Health, Safety, Security and Environment and to relations with local communities there is no specific reference to FPIC, tenure rights or the right to water in these documents. [Shell General Business Principles, 2014: s03.static-shell.com & Shell Supplier Principles, 31/01/2019: shell.com]
A.1.4	Commitment to engage with stakeholders	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: 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.' [Working With Communities, 05/07/2018: shell.com]

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			<ul style="list-style-type: none"> • Met: Regular stakeholder engagement: In its Sustainability Report, the Company discloses information of its stakeholder engagement activities, such as: '[...] in 2018, original plans for an above ground pipeline in Germany, which would have impacted three roads, were changed to a tunnel design following community engagement and agreement with the road agency.'; 'SPDC is working with the relevant stakeholders to implement the 2011 UN Environmental Programme (UNEP) report on Ogoniland. Over the last seven years, SPDC has taken action on all, and completed most, of the UNEP recommendations addressed specifically to it as operator of the joint venture.'; 'Shell has engaged in constructive multi-stakeholder dialogues to help grow responsible tax into a better understood and more widely practiced business norm.' [2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The Company 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. However, these examples are not clear how the regular stakeholder engagement influences the Company's human rights approach through monitoring or design. [Working With Communities, 05/07/2018: 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'. However, the company does not have a broader commitment to remedy or published any commitment that mention not obstructing access to other remedies or collaborating in initiatives that provide access to remedy. [Human Rights, 06/07/2018: 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 case where a devastating roll-over incident from a road tanker hired by a company in Pakistan caused the lost of 200 lives and left many other people seriously injured: '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'. However, this indicator looks for evidence of commitment to work with business partners to remedy adverse impacts through the business partners' own mechanisms or through collaborating in the development of third party non-judicial remedies. [2018 Sustainability Report, 02/04/2019: shell.com & Shell Supplier Principles, 31/01/2019: shell.com]
A.1.6	Commitment to respect the rights of human	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: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

Indicator Code	Indicator name	Score (out of 2)	Explanation
	rights defenders		

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy: The Code of Conduct, which includes human rights policy, has been signed by the CEO. [Code of Conduct, 01/11/2015] • Met: Board level responsibility for HRs: One of the four Board Committees is Corporate and Social Responsibility Committee (CSRC). It reviews and advises on sustainability policies and practices including human rights to ensure that these are discussed, understood, owned and promoted at Board level. [Shell Sustainability Report 2017, 2018: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: In its CEO Letter included in its 2018 Sustainability Report, it is said: 'As a founding member of the UN Global Compact, we also continue to support its corporate governance principles on human rights, environmental protection, anti-corruption and better labour practices.' However, there is no discussion about the importance of human rights for its business, or about the Company's approach to human rights. [2018 Sustainability Report, 02/04/2019: shell.com]
A.2.2	Board discussions	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: Board/Committee review of salient HRs: In 2018, the CSRC committee, which is a board level committee, meets regularly to review and discuss a wide range of sustainability-related topics and to assess the company's sustainability performance, audit results and the sustainable development metrics that apply to the Executive Committee scorecard. This includes human rights related issues. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Examples or trends re HR discussion: 'In 2018, the CSRC balanced its time between safety, environment and ethics, with a strong focus throughout on corporate culture and conduct. The topics discussed in depth included personal and process safety, road safety, the energy transition and climate change, [...] and its ethics programme. [...] In December, the committee spent a day visiting the Moerdijk facility in the Netherlands, where they discussed process safety performance and local site challenges, including Shell's relationship with the local community.' [2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both examples and process
A.2.3	Incentives and performance management	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: Incentives for at least one board member: The Company describes its incentive mechanism for its Executive Directors, including CEO: 'The Executive Directors' remuneration structure is made up of a fixed element of basic pay and the majority of the package is tied to two variable elements: the annual bonus (50% delivered in shares) and the Long-term Incentive Plan (LTIP). [...] Annual bonus = base salary x target bonus % x scorecard result (0–2); adjusted for individual performance with a 0–1.2 multiplier. Taking the Shell operating plan into consideration, REMCO sets stretching scorecard targets and weightings which support the delivery of the strategy. Measures are related to financial performance, operational excellence and sustainable development. Indicative weightings are 30%, 50% and 20% respectively.' The sustainable development performance measures include Safety and environmental performance. [2018 Annual Report, 2019: reports.shell.com] • Not met: At least one key EX RH risk, beyond employee H&S: As indicated above the sustainable development performance measures include Safety and environmental performance. However, it is not clear whether health and safety performance indicators include local communities and workers of extractive business partners. [2018 Annual Report, 2019: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria made public: As indicated above, the Company explains the remuneration structure and percentages related to safety and environment. [2018 Annual Report, 2019: reports.shell.com]

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

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. [Governance, 06/07/2018: 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, 06/07/2018: 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, 06/07/2018: shell.com]
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights: The Company describes its incentive mechanism for its Executive Directors: 'The Executive Directors' remuneration structure is made up of a fixed element of basic pay and the majority of the package is tied to two variable elements: the annual bonus (50% delivered in shares) and the Long-term Incentive Plan (LTIP). [...] Annual bonus = base salary x target bonus % x scorecard result (0–2); adjusted for individual performance with a 0–1.2 multiplier. Taking the Shell operating plan into consideration, REMCO sets stretching scorecard targets and weightings which support the delivery of the strategy. Measures are related to financial performance, operational excellence and sustainable development. Indicative weightings are 30%, 50% and 20% respectively.' The same annual bonus scorecard approach applies to Senior Management and other senior executives, supporting consistency of remuneration and alignment of objectives.' The sustainable development performance measures include Safety and environmental performance. [2018 Annual Report, 2019: reports.shell.com] • Not met: At least one key EX HR risk, beyond employee H&S: As indicated above the sustainable development performance measures include Safety and environmental performance. However, it is not clear whether health and safety performance indicators include local communities and workers of extractive business partners. [2018 Annual Report, 2019: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria made public: As indicated above, the Company explains the remuneration structure and percentages related to safety and environment. [2018 Annual Report, 2019: reports.shell.com]
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: The Company states 'We have embedded human rights into our existing frameworks and processes to demonstrate we respect human rights across the business.' In its Annual Report, the Company identifies its risks factors, which include: 'The nature of our operations exposes us, and the communities in which we work, to a wide range of health, safety, security and environment risks.' [2018 Sustainability Report, 02/04/2019: shell.com & 2018 Annual Report, 2019: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Company also states that they have collaborated closely with The Danish Institute of Human Rights since 1999 to assess and improve their human rights 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. The Company reports how the CSRC (The Corporate and Social Responsibility Committee), which is a board committee, review and advise Shell on our strategy, policies and performance against the Shell General Business

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Principles, our Code of Conduct and our Health, Safety, Security, Environment and Social Performance (HSSE&SP) standards (which includes human rights). 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'. However, CHRB could not find further information about the external assessing of the adequacy of the enterprise risk management system in managing human rights risks, or the Audit Committee overseeing such assessment. Current evidence seems to focus in advice. [Shell Sustainability Report 2017, 2018: reports.shell.com & 2018 Sustainability Report, 02/04/2019: shell.com]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: In its 2018 Modern Slavery Statement, the Company indicates that 'All Shell staff undertake regular refresher training on our Code of Conduct and associated Ethics and Compliance policies. Training participation is documented, repetition cycles are clearly defined and follow-up is automated. Also both the Code of Conduct and Shell General Business Principles are available on our website in a number of languages. [...] There is an e-learning tool on human rights which is available to all employees and contractors. It includes a specific supply chain case study.' The Code of Conduct, which covers the Company's human rights commitment. In addition, in its Ethics and Compliance Manual, the Company indicates: 'Staff must complete appropriate Shell Ethics and Compliance Training. The Ethics and Compliance training programme uses a risk based approach. The type of Ethics and Compliance training that Staff must take will depend on the level of risk associated with their role: "at risk" or "at higher risk". Businesses and Functions are accountable for Staff training nominations.' [2018 Modern Slavery Statement, 22/05/2019: shell.com & Shell Ethics and Compliance Manual, Oct 2018: https://shell.com companies list of Disclosure - Easy format.docx#_Hlk3568522_1,23766,23975,0,,shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder: The Company describes how it communicates its policy commitments under the Voluntary Principles of Security and Human Rights to communities and contractors. However, the Company does not describe how it communicates its broader human rights policy commitments to stakeholders, including local communities and potentially affected stakeholders more broadly. [VPSHR – Overview of Shell’s implementation in 2018, 2019: shell.com] • Met: How policy commitments are made accessible to audience: The Code of Conduct, which includes human rights policy, has been translated into 14 different languages. [Code of Conduct, 01/11/2015]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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 all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Communicating policy to EX contractors and joint ventures: The Company indicates in its 2018 Modern Slavery Statement that 'In conjunction with the Shell Supplier Principles, Shell companies have a Supplier Qualification System (SQS). Suppliers accept registration in SQS and, as a part of registration, are required to certify that they follow the Shell Supplier Principles or similar standards and their company complies with all applicable laws and regulations of the country or countries in which they do business. Under the standard procurement terms generally used by Shell, contractors and suppliers agree to adhere to the Shell General Business Principles and the Shell Supplier Principles.'; 'All Shell companies and Shell operated joint ventures must comply with local legislation and regulations and must conduct their activities in line with the Shell General Business Principles and our core values of honesty, integrity and respect for people. We also encourage joint ventures we do not operate to apply materially equivalent business principles.' In addition, in its Supplier Principles document, the Company states: '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.' In addition, in its 2018 VPSHR Report, the Company indicates: 'Awareness of the basic principles of the VPs and the risk profile at country or region level is a key requirement for the successful implementation of the VPs. We deliver training and awareness briefings on VPSHR – such as online modules, regional workshops, onsite training delivered by independent third parties, and train the trainer sessions – to both our own staff and third party security providers.' [2018 Modern

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Slavery Statement, 22/05/2019: shell.com & Shell Supplier Principles, 31/01/2019: shell.com</p> <ul style="list-style-type: none"> Met: Including to EX BPs (removed) <p>Score 2</p> <ul style="list-style-type: none"> Met: How HR commitments made binding/contractual: As indicated above: 'Under the standard procurement terms generally used by Shell, contractors and suppliers agree to adhere to the Shell General Business Principles and the Shell Supplier Principles'; 'All Shell companies and Shell operated joint ventures must comply with local legislation and regulations and must conduct their activities in line with the Shell General Business Principles and our core values of honesty, integrity and respect for people. We also encourage joint ventures we do not operate to apply materially equivalent business principles'. In addition, in its 2018 Sustainability Report, the Company indicates that it includes 'VPHSR clauses in our private security contracts and raise the principles in engagements with public security forces.' [2018 Modern Slavery Statement, 22/05/2019: shell.com & 2018 Sustainability Report, 02/04/2019: shell.com] Met: Including on EX BPs: See above.
B.1.5	Training on 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: Scores at least 1 on A.1.2: See indicator A.1.2 Met: Trains all workers on HR policy commitments: The Company indicates in its 2018 Modern Slavery Statement that 'All Shell staff undertake regular refresher training on our Code of Conduct and associated Ethics and Compliance policies. Training participation is documented, repetition cycles are clearly defined and follow-up is automated. Also both the Code of Conduct and Shell General Business Principles are available on our website in a number of languages.' Its Code cover human rights commitments. In addition, in its Ethics and Compliance Manual, the Company states: 'Staff must complete appropriate Shell Ethics and Compliance Training. The Ethics and Compliance training programme uses a risk based approach. The type of Ethics and Compliance training that Staff must take will depend on the level of risk associated with their role: "at risk" or "at higher risk". Businesses and Functions are accountable for Staff training nominations.' [2018 Modern Slavery Statement, 22/05/2019: shell.com & Shell Ethics and Compliance Manual, Oct 2018: https://shell.com/companies-list-of-disclosure-easy-format.docx#_Hlk3568522 1,23766,23975,0,,shell.com] Met: Trains relevant EX managers including security personnel: The Company discloses 'We provide a training supplement called Human Rights Dilemmas to help managers to understand their responsibilities and take action to support human rights.' The Company also discloses how they provide human rights training to security staff. For example the Company states 'worked with the Danish Institute for Human Rights to train staff and contractors in Nigeria since 2005 in managing difficult situations, like responding to conflict in local communities. With CLEEN Foundation a leading Nigerian NGO we are also training security staff on our security standards.' [Shell BHRRC Survey Response, 09/07/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> Met: Score of 2 on A.1.2: See indicator A.1.2 Met: Both requirements under score 1 met: The Company has demonstrated that it provides training on human rights to all employees, the company's relevant managers and some security personnel. The Company discloses in their report the VPSHR 'We deliver training and awareness briefings on VPSHR – such as online modules, regional workshops, onsite training delivered by independent third parties, and train the trainer sessions – to both our own staff and third party security providers.' [VPSHR – Overview of Shell's implementation in 2018, 2019: shell.com]
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2 Met: Monitoring implementation of HR policy commitments: The Company describes its screening for integrity and compliance, however, it is not clear whether this covers human rights compliance. In its 2018 Modern Slavery Statement, the Company reports how on an annual basis the Company collects performance data against internal mandatory requirements such as the Shell General Business Principles and our Code of Conduct - which cover human rights. Senior Shell representatives are required to confirm such performance data where Shell is the operator or has a controlling interest. [2018 Sustainability Report, 02/04/2019: shell.com & 2018 Modern Slavery Statement, 22/05/2019: shell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Monitoring EX BP's: The Company has Supplier Principles. The Company indicates in its 2018 Sustainability Report that: 'Certain areas of our supply chain may pose a higher risk to labour rights due to their location and the nature of the goods and services we procure. We use a defined set of criteria to identify potential supply chain risks and, where we see risk, we ask suppliers and contractors to respond to our due diligence assessments before awarding a contract. This assessment requires our suppliers and contractors to declare whether they have a process in place to assess and manage social risks with their own suppliers. If gaps are identified, 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'. It also adds that in non-operated joint ventures Shell appointed members of the board expect partners to adopt Shell commitments or one materially equivalent: 'when these joint ventures implement our control framework, or a similar approach, Shell teams carry out independent audits or participate in the joint venture's own auditing programmes, which helps to assure the joint venture's compliance'. [2018 Sustainability Report, 02/04/2019: shell.com] Score 2 • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company states 'If gaps are identified, 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.' However, CHRB could not find figures about non compliance or incidents found. [2018 Sustainability Report, 02/04/2019: shell.com & Shell Sustainability Report 2017, 2018: reports.shell.com] • Met: Example of corrective action: In its Modern Slavery Statement, the Company indicates: 'One of the suppliers to be audited was found to have significant gaps in its controls. We immediately suspended purchasing from that supplier until a follow-up audit confirmed that factory conditions had been improved and that workers' rights were being fully respected'. However, it seems to refer to goods procurement rather than extractive business partners. In 2017 report, the Company describes The Company describes an example of identifying an opportunity to improve on-site and off-site welfare of workers and clarify worker recruitment practices in their Singapore operations after having this identified as an issue for the operation. 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'. [2018 Modern Slavery Statement, 22/05/2019: shell.com & Shell Sustainability Report 2017, 2018: reports.shell.com] • Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging business relationships	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: HR affects selection EXs business partners: The Company states 'Certain areas of our supply chain may pose a higher risk to labour rights due to their location and the nature of the goods and services we procure. We use a defined set of criteria to identify potential supply chain risks and, where we see risk, we ask suppliers and contractors to respond to our due diligence assessments before awarding a contract.' [2018 Sustainability Report, 02/04/2019: shell.com] • Met: HR affects on-going EX business partner relationships: The Company states, in relation to the Shell General Business Principles, and the Shell Supplier Principles, which cover the Company's requirements with regards to labour and human rights, 'If gaps are identified, 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.' The Company also describes in their Modern Slavery reporting 'Through our supplier qualification process, contractors or suppliers may be subject to onsite audits, which may be announced or unannounced, and which may be performed by either Shell personnel or third-party auditors. Allegations of practices running contrary to our Supplier Principles that are raised to us will be investigated and may result in suppliers being required to develop corrective action plans backed up by onsite audits. In addition, contracts may be terminated with immediate effect if suppliers breach Business Principles.' The Company also describes how operated joint ventures must comply with the Company's human rights policies, and how non-operated joint venture partners are encouraged to 'apply materially equivalent

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>business principles.' [2018 Sustainability Report, 02/04/2019: shell.com & 2018 Modern Slavery Statement, 22/05/2019: shell.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Met: Working with EX business partners to improve performance: The Company also describes how in Shell contracts, suppliers agree to provide and maintain safe and healthy working conditions of all supplier personnel. In 2017, they ran a series of engagements with Shell procurement teams in higher-risk locations to raise awareness and improve understanding of contractor worker welfare. No new relevant evidence found in last year reports. [Shell Sustainability Report 2017, 2018: reports.shell.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: The Company describes in the diagram 'A guide to sustainability across the life of a project' that the Company has a process of identifying people who may be interested in or affected by the project. The Company states that they 'work with subject matter experts (SMEs) to understand the effects that a project may have on land, livelihoods and culture.' As indicated below, the Company has engaged with affected stakeholders in relation to human rights issues. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Frequency and triggers for engagement: The Company discloses 'The first stage of project planning involves carrying out an impact assessment to understand the potential effects on local communities, including people's health and the environment. Impact assessments are usually carried out by specialist external consultants, under the management of Shell's experienced impact assessment practitioners....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. The specialists work with our project and technical teams to investigate opportunities to first avoid or, where this is not possible, to minimise impacts.' The Company also indicates 'Our network of around 100 community liaison officers acts as a bridge between the local community and the business. [...] Together, the officers and the business that they represent aim to continually improve the effectiveness of community engagement, impact management and how we share benefits with the community.' [Working With Communities, 05/07/2018: shell.com & 2018 Sustainability Report, 02/04/2019: shell.com] • Met: Engagement includes EX business partners workers: The Company provides examples of engagements with the workers in their supply chain. For example, the case discloses in its 2018 VPSHR Report: 'Regular engagements were held on VPSHR for staff within BGC [Basrah Gas Company (BGC), a joint venture with the Iraqi government], with a VPSHR component also included as part of their broader security training.' [VPSHR – Overview of Shell's implementation in 2018, 2019: shell.com] • Met: Engagement includes EX business partners communities: The Company provides the example of restoring land, as part of work to decommission a gas project in China. 'After extensive consultation with land owners and local authorities on how best restore the site [...] this helped local population -made up mainly of elderly people, women and children - to more easily reap in early harvest. [Respecting our neighbors, 08/2019: shell.com & Farming for future generations, N/A: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: 'We focus on four areas where human rights are critical to the way we operate: communities, security, labour rights and supply chains'. 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 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'. [2018 Sustainability Report, 02/04/2019: shell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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. Country risk is derived from external indices provided by Verisk Maplecroft that indicate the potential for modern slavery risks to people in a given country. Category risk has been determined by an expert analysis of typical contract work-scopes, identifying those such as construction or maintenance services where there may be higher risks of unethical labour practices in the recruitment of migrant workers and in our supply chains for branded merchandise'. [2018 Modern Slavery Statement, 22/05/2019: shell.com] Score 2 • Met: Ongoing global risk identification: The Company conducts impact assessments when they plan new projects. The Company states that they 'We assess and manage the potential social impact of all our projects as part of integrated environmental, social and health impact assessments.' These impact assessment cover human rights elements- such as indigenous peoples rights. The Company describes 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.' The Company states 'The number of assessments follows our risk-based approach and is dependent on the level of project activity and the number of new contracts awarded throughout the year.' Furthermore, the Company also undertakes risk assessments and works with key stakeholders to mitigate risks identified with a view to reducing harm to people through their security provisions. The Company implements the VPSHR across Shell which covers security related human rights risk-identification process'. [2018 Sustainability Report, 02/04/2019: shell.com & Shell Sustainability Report 2017, 2018: reports.shell.com] • Met: In consultation with stakeholders: The Company consults 'with international organisations, companies and civil society to understand and respond to current and emerging human rights issues relevant to our business.' [2018 Sustainability Report, 02/04/2019: shell.com] • 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.' [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Triggered by new circumstances: As indicated above, process is conducted when planning new projects. [2018 Sustainability Report, 02/04/2019: shell.com & Shell Sustainability Report 2017, 2018: 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 assess and manage the potential social impact of all our projects as part of integrated environmental, social and health impact.' The Company also states that they train project teams to understand how to use impact assessments to embed sustainability into project decisions, and they cover areas such as indigenous peoples rights, cultural heritage and resettlement. [2018 Sustainability Report, 02/04/2019: 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: Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company discloses that they have a human rights working group within Shell where representatives from across Shell's businesses meet to discuss and evolve our human rights approach. Furthermore, the Company consults with international organisations, companies, civil society, and relevant bodies to understand and respond to current and emerging human rights issues. 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: 'Our risk assessment is a combination of both country and category risk. Country risk is derived from external indices provided by Verisk Maplecroft that indicate the potential for modern slavery risks to people in a given country'. [Human Rights, 06/07/2018: shell.com & 2018 Modern Slavery Statement, 22/05/2019: shell.com] • Not met: Public disclosure of salient risks: Human rights within Shell focuses on four key areas: communities, Security, Labour Rights and the Supply Chain. 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, CHRB

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>could not find further information of general salient human rights risks and impacts. [Human Rights, 06/07/2018: shell.com & Working with communities, 08/2019: shell.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met [Human Rights, 06/07/2018: 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 describes "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." [2018 Sustainability Report, 02/04/2019: shell.com] • 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.' [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 report. [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.' [2018 Sustainability Report, 02/04/2019: shell.com & 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 report. [Shell Sustainability Report 2017, 2018: reports.shell.com & 2018 Sustainability Report, 02/04/2019: 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: The Company has demonstrated communicating how it identifies its human rights risks and impacts including its own activities and business partners (see b.2.1) • Not met: Comms plan re assessing risks • Met: Comms plan re action plans for risks: The Company has demonstrated that it has a system to take action to prevent, mitigate ore remediate its salient issues including its own activities and business partners (see b.2.3) • Met: Comms plan re reviewing action plans: The Company has demonstrated that it has a system to track actions taken to prevent, mitigate ore remediate its salient

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>issues including its own activities and business partners, and provides an example of lessons learned (see b.2.4)</p> <ul style="list-style-type: none"> • Met: Including EX business partners: See above <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 Jinqu 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 Jinqu. "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 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, 08/2019: shell.com & Respecting our neighbors, 08/2019: shell.com] • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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. [Shell Global Helpline, 29/06/2018: shell.com & 2018 Sustainability Report, 02/04/2019: 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 370 substantiated breaches of the Code of Conduct in 2018 compared with 261 in 2017. As a result, we dismissed or terminated the contracts of a total of 92 employees and contract staff, compared with 73 in 2017. Most Code of Conduct violations related to protection of assets, conflicts of interest and harassment.' However, It is not clear how many of these are human rights specific. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Channel is available in all appropriate languages: The Shell Global Helpline is available in 11 different languages. [Shell Global Helpline, 29/06/2018: shell.com] • Not 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.' However it is not clear whether the Company requires business partners to convey the same expectations to their own business partners. [Shell Supplier Principles, 31/01/2019: 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 individuals and communities	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 Shells principles. The Company states that 'The Shell Global Helpline, is also accessible to third parties with whom Shell has a business relationship (such as customers, suppliers, agents) if they observe wrongdoing by a Shell company or employee'. <p>The Company also states ' Complaints can be filed for a variety of issues, including bribery and corruption, concerns related to the activities of the company that affect human rights and/or the wellbeing of communities within which the company works, and concerns related to the activities of the company that affect society and environment. [Shell Global Helpline, 05/07/2018: accessfacility.org]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Company states 'Both employees and other individuals as described above can report concerns through the Shell Global Helpline. The Helpline is open 24 hours a day, 365 days a year through two channels: <ul style="list-style-type: none"> -local telephone number in each country. Complainants can call the helpline from any country in which Shell operates without a charge. Local telephone numbers can be found here. If requested, an interpreter can be brought into the call to assist the English-speaking interviewer. -Global Helpline website. The complainant can fill in a form to submit their query or concern. The website is available in 14 languages' [Shell Global Helpline, 05/07/2018: accessfacility.org] • 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.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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"> • Not met: Response timescales: Calls and reports over the Helpline are received on behalf of Shell by an independent third party specialist Helpline provider. The Company states that 'Reports are passed to a Regional Coordinator who will assess the report and allocate it to a Case Manager to decide the appropriate action. If the report is a query, or perhaps a dilemma for which advice is sought, it will be passed to someone qualified to provide that advice. If the report is in the nature of an allegation that requires careful investigation, an investigator or investigation team will be assigned. This will usually involve a suitably-trained investigator from the country to which the report refers, who has local expertise'. No details found, however, in relation to timescales. [Shell Global Helpline, 05/07/2018: accessfacility.org & 2018 Sustainability Report, 02/04/2019: shell.com] • Met: How complainants will be informed: The Company states 'At the end of the telephone interview or submission of a web report, the complainant will be given a report number and PIN code in order to be able to call back or access the website to check if there is a response from the company, or to provide additional information. Reported concerns will be logged and handled in accordance with consistent case management and investigation guidelines.' [Shell Global Helpline, 05/07/2018: accessfacility.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: The Company states 'If the report is in the nature of an allegation that requires careful investigation, an investigator or investigation team will be assigned. This will usually involve a suitably-trained investigator from the country to which the report refers, who has local expertise. If the reported incident requires expertise not available within Shell, an outside expert may be involved under similar strict confidentiality.' [Shell Global Helpline, 05/07/2018: accessfacility.org]
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: The Company states in its 2018 Modern Slavery Statement: 'We have a Global Helpline in place for all employees and contract staff in Shell and for third parties with whom Shell has a business relationship (such as customers, suppliers, agents) to raise concerns and report instances of potential non-compliance with our values and principles, in full confidence and without fear of retaliation'. Elsewhere it discusses how other external stakeholders can utilise the Global Helpline. The Company states 'We

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>maintain a stringent no retaliation policy to protect any person making a good faith allegation.' [2018 Modern Slavery Statement, 22/05/2019: shell.com & 2018 Sustainability Report, 02/04/2019: shell.com]</p> <ul style="list-style-type: none"> • Met: Practical measures to prevent retaliation: The Company states that 'a complainant can communicate anonymously, by identifying themselves and asking to communicate with just one person without their name being recorded, or they can provide name and contact details.' The Company also states 'Details of the case, and especially the identity of the person who made the report and any persons mentioned in the report, are kept confidential and only shared on a strict need-to-know basis.' Furthermore, the helpline is operated by a third party provider. [Shell Global Helpline, 05/07/2018: accessfacility.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice: The Company states that they 'maintain a stringent no retaliation policy to protect any person making a good faith allegation', however it is not clear whether the Company has not retaliated in practice. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Expects EX BPs to prohibit retaliation: The Modern Slavery Statement describes how The Global Helpline is in place for all employees, contract staff, and third parties, allows concerns to be raised 'in full confidence and without fear of retaliation.' Furthermore, the Company describes in the Modern Slavery Statement how 'All Shell companies and Shell operated joint ventures must comply with local legislation and regulations, and must conduct their activities in line with the Shell General Business Principles and our core values of honesty' and they 'encourage joint ventures we do not operate to apply materially equivalent business principles.' [2018 Modern Slavery Statement, 22/05/2019: shell.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
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 some cases where remedy was provided: '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, [...]. Tragically, the fuel ignited resulting in the loss of more than 200 lives and left many other people seriously injured. Following the incident, 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'; 'In 2018, the SPDC JV experienced an increase in the number of sabotage related spills. Regrettably, operational spills also increased (more below on Spill and response data). Regardless of the cause, SPDC cleans up and remediates areas impacted by spills that come from its facilities. In the case of operational spills, SPDC also pays compensation to people and communities impacted by a spill. Once the clean-up and remediation are completed, the work is inspected, and, if satisfactory, approved and certified by Nigerian government regulators'. [2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Met: Evaluation of the channel/mechanism: The Company has described in their Goals, Performance and Plans for 2017 that they made progress in 2017 by :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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			of the mechanism based on UN Guiding Principles and Human Rights criteria for implementation in all major facilities and projects'. [Shell Sustainability Report 2017, 2018: reports.shell.com & 2018 Sustainability Report, 02/04/2019: shell.com]

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Member of EITI: Shell is a member of the EITI. [Royal Dutch Shell: EITI Website, 05/07/2018: eiti.org] • Met: Reports of taxes and revenues beyond legal minimums: The EITI website states 'From 2016 onwards, Shell makes mandatory disclosures under the Reports on Payments to Governments Regulations 2014, and files its 'Report on Payments to Governments' with the UK's Companies House. The Company has published its 2018 Report on Payments to Governments. The report includes the detailed payments and royalties on a project by project basis in 34 countries. [Royal Dutch Shell: EITI Website, 05/07/2018: eiti.org & Report on Payments to Governments for the Year 2018, 2019: shell.com] Score 2 <ul style="list-style-type: none"> • Met: Steps taken re non EITI countries: Shell contributed USD 60,000 to the EITI in 2018. Shell participates in the multi-stakeholders groups', (MSG) in several countries. Most recently Shell joined the MSG in the Netherlands. [Royal Dutch Shell: EITI Website, 05/07/2018: eiti.org]
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: Although the Company 'is committed to respecting human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization core conventions.', no evidence found of an statement where the Company commits against and describes the measures put in place to prohibit any form of intimidation or retaliation against workers seeking to exercise their rights to form or join trade unions and to bargain collectively. [2018 Sustainability Report, 02/04/2019: shell.com & 2018 Modern Slavery Statement, 22/05/2019: shell.com] Score 2 <ul style="list-style-type: none"> • Not met: Discloses % covered by collective bargaining • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company records the Lost Time Injury Frequency and the Total Recordable Case Frequency. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Fatalities disclosures: The Company reports the Fatal Accident Rate (FAR) of fatalities per 100 million working hours. [2018 Sustainability Report, 02/04/2019: shell.com] Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company states their goals of 2018: TRCF <= 0.7 - Achieve total recordable case frequency (TRCF) – the number of injuries per million working hours – of 0.7 or below for employees and contractors. Goal Zero has been our ambition for personal safety since 2007. [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Met targets or explains why not: The Company states their goals for 2018, discloses the progress made in 2018 and priorities in 2019. The Company states whether they have achieved their goals, and also has a qualitative breakdown on their safety performance. [2018 Sustainability Report, 02/04/2019: shell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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"> • Not met: Process to identify indigenous rights holders: The Company states ' In line with Shell's General Business Principles, and in support of the UN Declaration on the Rights of Indigenous Peoples, our approach is to continue seeking the support and agreement of indigenous peoples potentially affected by our projects. We do this through mutually agreed, transparent and culturally appropriate consultation and impact management processes. It requires open dialogue, good faith negotiations, and, where appropriate, the development of agreements that address the needs of indigenous peoples'. In its country specific website from Shell Canada, the Company discloses information describing its commitments and strategy with respect Indigenous Peoples. However, it is not clear what the Company's process is to identify indigenous rights holders. [Working with communities, 08/2019: shell.com & Shell Canada - Indigenous Peoples, 08/2019: shell.ca] • Not met: How engages with communities in assessment <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to FPIC (or ICMM): In its 2018 Sustainability Report, the Company states that it 'has developed a public position statement on Free Prior Informed Consent (FPIC), a principle recognised in the United Nations Declaration on the Rights of Indigenous Peoples. Our statement is based on a prerequisite to engage in dialogue with local indigenous communities and come to a joint agreement on the way forward in project development. For example, the LNG Canada joint venture (Shell interest 40%) was planned and designed by working closely with local communities, First Nations (indigenous peoples) and governments. We continue to seek the support and agreement of indigenous peoples potentially affected by our projects. We do this through mutually agreed, transparent and culturally appropriate dialogue and impact management processes.' [2018 Sustainability Report, 02/04/2019: shell.com] • Met: Gives recent example FPIC or dropping deal: See above. In the Context of FPIC, a joint venture was planned and designed by working closely with local communities, First Nations (indigenous peoples) and governments. [2018 Sustainability Report, 02/04/2019: shell.com]
D.3.6	Land rights (in own extractive operations, which includes JVs)	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: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	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: How implements security (inc VPs or ICOC): The Company publishes an annual report to the VPSHR. The Company describes how they actively implement the VPSHR and contains an overview of Shell's implementation of VPSHR through 20178 including country implementation examples. [VPSHR – Overview of Shell's implementation in 2018, 2019: shell.com] • Met: Example of respecting HRs in security: The Company provides examples of how the Shell Companies in Nigeria, Indonesia and Iraq ensure the VPSHR continue to be a key focus area. The Company describes their stakeholder engagements and trainings related to security and human rights. [VPSHR – Overview of Shell's implementation in 2018, 2019: shell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Ensures Business Partners follow security approach: The Company describes how Language on the VPs and the Shell Group requirements on the Use of Force are included in our private security contracts. The Company also states 'We continuously work to maintain the safety, security and human rights of our employees, contract staff, and local communities. The Voluntary Principles on Security and Human Rights (VPSHR) are implemented across Shell operations where there are identified threats of infraction.' The Company also states in its 2018 Sustainability Report: 'More than half of Shell's joint ventures are not operated by Shell. We do not have direct control over how these ventures embed sustainability in their operations but seek instead to exert a positive influence on their operations and offer our support. For instance, our 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.' [The Voluntary Principles on Security and Human Rights - Overview of Shell's implementation in 2017, 2017 & 2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Assesses and involves communities: The Company describes how they involved community within the stakeholder engagements and training related to security and human rights in Nigeria and Iraq. [VPSHR – Overview of Shell's implementation in 2018, 2019: shell.com] • Met: Working with local community: The Company describes how they involved community within the stakeholder engagements and training related to security and human rights in Nigeria and Iraq. The Company describes how they conducted community engagement through their community relations platforms to discuss security issues and allow communities to raise concerns that they may have. [VPSHR – Overview of Shell's implementation in 2018, 2019: shell.com]
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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: Action to prevent water and sanitation risks: The Company indicates in its 2018 Sustainability Report: 'We carefully manage our water use and discharges. We design and operate our facilities to help reduce fresh water use, and we tailor our use of fresh water to local conditions because water constraints affect people at the local or regional level. Our environmental, social and health impact assessments help us to better understand the water risks for our projects and broader watershed impacts. We evaluate the long-term sustainability of water resources to select the option that avoids or minimises disruption to the environment and other users. We assess risks based on water availability, quality and accessibility. To help us define water stress conditions, we use a combination of publicly available water stress tools, such as the World Resources Institute's Aqueduct Water Risk Atlas, and information specific to the local environment. In water-scarce areas, we develop water management plans for our facilities. These plans describe the long-term risks to water availability and define measures to minimise our use of fresh water or recommend alternatives, such as recycled water, processed sewage water and desalinated water. For example, in 2018, Shell affiliate QGC Pty Limited's natural gas project in Queensland, Australia, continued to conduct research into groundwater-dependent ecosystems in the Surat Basin. We want to determine the impact of water use in areas where surface water is absent for large parts of the year and where ecosystems are dependent on groundwater'. [2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

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. <p>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.</p> <p>During 2018, allegations related to these operations remain ongoing: On March 16, 2018, Amnesty International has exposed evidence that Shell and Eni are taking weeks to respond to reports of spills and publishing misleading information about the cause and severity of spills, which may result in communities not receiving compensation. Similarly, on August 4, 2018, 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.</p> <p>During 2018, Nigerian Court rules 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."</p> <ul style="list-style-type: none"> • Sources: [Amnesty International, 07/11/2013 -: amnesty.org][The Premium, 9/07/2018: 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 <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> <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</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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.</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 • Met: Policies apply to the type of business relationships involved <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'
E(1).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: 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." [2018 Sustainability Report, 02/04/2019: shell.com] • Not met: Encourages linked business to engage affected stakeholders • Met: Provides remedies to affected stakeholders: 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. In addition, SPDC has indicated: 'SPDC is pleased that after significant engagement in 2016 and 2017 with the communities and other stakeholders managed by the BMI, the clean-up and remediation activities commenced in September 2017. (...) Should activities continue uninterrupted it is expected to take approximately three years. Phase 1 of the clean-up is expected to be completed in early 2018 as per plan. However, for clean-up and remediation to be successful, the repeated re-contamination of cleaned-up sites due to crude oil theft and illegal refining must end. A coordinated approach among all stakeholders, particularly federal and state government agencies is essential to address the ongoing problem of re-pollution'. • Not 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. However, this is part of the company's operational system and there is no indication that this is in response to the allegation. [2018 Sustainability Report, 02/04/2019: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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".</p> <p>• Sources: [Reuters - 07/07/2017: reuters.com][Shell's website: shell.com]</p>
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 <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 • 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. <p>Score 2</p> <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	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 [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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>training and support for setting up small businesses.” [2018 Sustainability Report, 02/04/2019: shell.com]</p> <ul style="list-style-type: none"> • Not met: Provides remedies to affected stakeholders: In a speech in 2018 the company's CEO mentions 'Shell Pakistan is implementing a long-term relief plan for those affected' but there are no further details available • 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] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: UPDATE: 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 publicly to the allegation	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: Public response available: Shell’s response to the allegations stated that the company was looking into the allegations from IndustriALL’s and would respond to them directly in due time. [Shell's Response re labour abuses in Nigeria, 05/11/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
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: shell.com & Human Rights, 06/07/2018: 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: shell.com] <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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: shell.com & Sustainability - Our Approach: shell.com]</p>
E(3).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: There is no evidence to suggest that Shell has engaged with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that Shell has encouraged linked businesses to engage affected stakeholders. • Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that Shell has provided remedies to affected stakeholders. • Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that Shell has reviewed management systems to prevent recurrence. • Not met: Denies allegations, but has engaged affected stakeholders: IndustriALL reported that the company stated "Shell companies in Nigeria (SCiN) have a long history of recognizing the rights of its employees, including to join a trade union," and that "we do not recognize the allegations that Shell fails to implement its human rights commitments." However, there is no evidence that Shell's response has been made public by IndustriALL. There is no evidence that the company has engaged affected stakeholders. [Shell Nigeria September 2018 Mission report, Sept 2018: industrial-union.org & IndustriALL calls on Shell to intervene, Oct 2018: industrial-union.org] • Not met: Denies allegations, but reviewed systems to prevent such impacts: There is no evidence that Shell reviewed systems in light of the allegations. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no evidence to suggest that Shell has provided remedies to victims. • Not met: Has improved systems and engaged affected stakeholders: Following the allegations, Shell announced in September 2018 that it would work with BP, Equinor and Total to "create a collaborative approach to human rights supplier assessments in the energy industry." This would include the creation of an industry framework for human rights supplier assessments, with assessment results shared through an independent third party. However, the company states: "The initiative does not include collaboration on selection of suppliers, which continues to remain the independent decision of each participant." There is no evidence to suggest that Shell has engaged affected stakeholders. [Joint industry human rights supply chain engagement, 24/09/2018: shell.com] • Not met: Denies allegations, but implements review recommendations: There is no evidence to suggest that Shell has implemented review recommendations. • Not met: Denies allegations, and ensures systems prevent such impacts: There is no evidence to suggest that Shell has ensured its systems prevent such impacts in the future.
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 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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Sources: [Latin America Bureau - 11/03/2019: lab.org.uk][Greenpeace - 17/12/2018: greenpeace.org.ar][France 24 - 17/12/2018: france24.com]
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> <ul style="list-style-type: none"> 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. [Latin America Bureau article, 11/03/2019: lab.org.uk] <p>Score 2</p> <ul style="list-style-type: none"> 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]
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> <ul style="list-style-type: none"> 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. [Shell Environmental Approach: shell.com & Shell Impact Assessments: shell.com] 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." [Shell Environmental Approach: shell.com] <p>Score 2</p> <ul style="list-style-type: none"> 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.
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> <ul style="list-style-type: none"> Met: Engages with 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] Not met: Encourages linked business to engage affected stakeholders: There is no publicly available evidence of the company encouraging the linked business Treater Neuquén S.A. to engage with affected stakeholders. The company is only reported as saying that the authorities are responsible for supervising the company's [Treater's] operations. [Latin America Bureau article, 11/03/2019: lab.org.uk] Not met: Provides remedies to affected stakeholders: While the company provides evidence of mechanisms through which individuals can seek remedy, there is no evidence that remedy has been provided to the affected communities including the village of Anelo, following the allegations of dumping of toxic waste from fracking. [Latin America Bureau article, 11/03/2019: lab.org.uk] Not met: Has reviewed management systems to prevent recurrence: There is no publicly available evidence of Shell having reviewed its management systems to prevent recurrence. <p>Score 2</p> <ul style="list-style-type: none"> Not met: Remedies are satisfactory to the victims: There is no publicly available evidence of Shell providing remedy that is considered satisfactory to the affected stakeholders Not met: Has improved systems and engaged affected stakeholders: While Shell provides evidence of having engaged with the affected stakeholders, there is no evidence that it has improved its systems.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.26 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Royal Dutch Shell made data public that met one or more elements of the methodology in 31 cases, leading to a disclosure score of 3.26 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company reports in line with guidelines developed by in accordance with the Global Reporting Initiative (GRI) version 4. [2018 GRI Index, 02/04/2019: reports.shell.com]
F.3	Key, High Quality Disclosures	1.2 out of 4	Royal Dutch Shell met 3 of the 10 thresholds listed below and therefore gets 1.2 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

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

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and Wales.

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.