
THE VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS: OVERVIEW OF IMPLEMENTATION BY SHELL IN 2022

Introduction

1. Since their development in 2000, companies in the Shell Group¹ have actively implemented the Voluntary Principles on Security and Human Rights (VPSHR), which guide companies in assessing human rights risks when working with public and private security. Security staff and contractors have been trained in the VPSHR and we have incorporated the principles into our core security-related processes and contracts.
2. In 2022, implementation of the VPSHR continued across prioritised Shell companies (these countries are identified based on set threat assessment criteria). Practical implementation included: conducting and updating VPSHR threat/risk assessments and questionnaires; briefing key internal and external stakeholders on human rights risks; delivering VPSHR training to staff and contractors; and ensuring that we monitored for any incidents, allegations or grievances related to our security operations. This report summarises our overall approach and key activities, with country-specific examples.

Country Implementation

3. Progress was made on the in-country implementation of the VPSHR throughout the Shell Group. Below are summaries of activities carried out by Shell companies in some of the VPSHR priority countries.

Nigeria

4. The Shell Companies in Nigeria ('SCiN') have their main operations located in the Niger Delta as well as offshore. Government Security Agencies (GSA) provide (armed) security for many facilities/activities. Shell also employs unarmed private security personnel. Staff of the various SCiN devote time and resources to ensuring that the VPSHR continue to be a key focus area.
5. Implementation of the VPSHR in Nigeria included the following steps:

¹ The companies in which Shell plc directly and indirectly owns investments are separate legal entities. In this letter "Shell", "Shell Group" and "Group" are sometimes used for convenience where references are made to Shell plc and its subsidiaries in general. Likewise, the words "we", "us" and "our" are also used to refer to Shell plc and its subsidiaries in general or to those who work for them."

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- The VPSHR threat and risk assessment was reviewed, and the annual questionnaire updated.
 - VPSHR training sessions were held for relevant SCiN personnel, including the Corporate Relations team, frontline security staff, and functional teams. Training is interactive and includes discussions of VPSHR scenarios and challenges, and how to manage these. Train the trainer programmes were also conducted, with 12 human rights trainers receiving VPSHR training.
 - Private security personnel received pre-deployment VPSHR briefings and quarterly refreshers. VPSHR clauses were included in all contracts. Private security providers are also monitored against contractual performance indicators.
 - GSAs at SCiN operations were engaged on VPSHR at deployment, during onboarding, and at quarterly refresher briefings. In particular, GSAs were briefed on the VPSHR, Shell's commitments to human rights, and the Use of Force (UoF) Principles.
 - Meetings with senior GSAs were also held at the tactical and operational levels. In addition, weekly meetings with the commander of Operation Delta Safe were held to ensure GSA security operations are conducted in alignment with the VPSHR.
 - Quarterly engagements were planned with stakeholders in civil society through the Nigeria Working Group, where host communities' security and human rights concerns are discussed.
 - Engagements were also held with the National Human Rights Commission at the national and regional level to promote the VPSHR.

Bolivia

6. Shell's operations in Bolivia centre around decommissioning and restoration activities of well projects and gas processing activities. Shell relies on private security companies, which are unarmed.
7. Implementation of the VPSHR in Bolivia included the following steps:
 - The Bolivia VPSHR threat and risk assessment was reviewed and updated in 2022, and an annual questionnaire was conducted.
 - The Corporate Security team had regular VPSHR engagements with relevant Shell staff, including on intelligence assessments, training on the implementation of the VPSHR and UoF Principles.
 - The Corporate Relations teams conducted regular meetings with community representatives and engaged with stakeholders in civil society, including journalists and union leaders.
 - The Corporate Relations team also maintained close relationships with government officials to discuss security arrangements, amongst other things.

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- The Intelligence & Assessment team, in collaboration with facility managers, conducted regular analyses of external developments around Shell's area of operations that could have a potential security impact.
 - Private security personnel were screened during tender and trained on VPSHR and the UoF on an annual basis as part of their contractual agreement. These trainings included practical examples and discussions of lessons learned. Their performance on VPSHR and the UoF is continuously monitored.

Philippines

8. The Shell companies in the Philippines (SciP) represent various companies operating in oil and gas exploration, extraction, delivery to consumers and processing services related to finance, human resources, procurement, and customer service. Private security personnel at several terminals are equipped with batons; close protection agents are armed with firearms. Shell relied on the Joint Task Force Malampaya (JTFM) public security forces for the protection of the Malampaya Natural Gas Project until its divestment in November 2022.
9. Implementation of the VPSHR in the Philippines in 2022 included the following steps:
 - The VPSHR threat and risk assessment, as well as annual questionnaire, were reviewed and updated in 2022.
 - Monthly VPSHR discussions were held with relevant SciP personnel as part of Corporate Security's monthly meeting, including with the Real Estate Asset Protection team and the team lead for close-protection staff.
 - Private security companies received quarterly briefings on VPSHR and the UoF. Due to ongoing COVID and related travel restrictions in-country, many of these engagements were still held virtually.
 - Furthermore, private security companies were screened on their human rights records and their performance was evaluated through quarterly key performance indicator reviews. VPSHR and UoF clauses were also included in the contract of Shell's private security providers.
 - The Country Security Manager and Business Security Manager conducted VPSHR awareness trainings with the JTFM officers and personnel in mid-2022. The Shell security team also engaged with the JTFM leadership on VPSHR and the UoF.
 - Furthermore, Site Security Focal Points held regular meetings with government stakeholders.
 - The Corporate Relations team had regular engagements with local communities as part of the stakeholder management programme. A number of these communities have benefited from Shell's assistance programs when these areas have been affected by natural disasters, like storms, volcano eruptions and earthquakes.

Lessons learned

10. The following were some of the broader lessons learned through the course of implementation in 2022:

- Frontline security staff in direct contact with GSAs have received training to identify VPSHR risk situations and to proactively report on them. This has allowed Shell to reduce its VPSHR risk exposure.
- Making training scenario-based and including real videos and examples in VPSHR briefings has led to improved awareness on security and human rights issues.
- Private security companies in some priority countries are not familiar with the VPSHR, resulting in push back to include VPSHR provisions in contracts. In that case, we work closely with these companies to show them how implementing the VPSHR contributes to better and safer security. VPSHR provisions were then successfully included in those contracts.
- Cultural differences on human rights in some priority countries can present a challenge when engaging with local stakeholders. However, through a process of education and mentorship, best practice, and leadership, we have witnessed that commitments to protect human rights can be achieved through time.