

EXTERNAL PUBLICATION



THE VOLUNTARY PRINCIPLES ON
SECURITY AND HUMAN RIGHTS:
OVERVIEW OF IMPLEMENTATION BY
SHELL IN 2025

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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 providers and contractors have been, and are being trained in the VPSHR, and Shell has incorporated the principles into its core security-related processes and contracts.
- In 2025, implementation of the VPSHR continued across prioritised Shell companies (identified based on set threat assessment criteria). Practical implementation included: conducting and updating VPSHR threat and risk assessments and questionnaires; briefing key internal and external stakeholders on human rights risks; delivering VPSHR training to staff and contractors; including VPSHR and Use of Force legal clauses in contracts of private security providers; and ensuring that we monitor 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

2. 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.

¹ The companies in which Shell plc directly and indirectly owns investments are separate legal entities. In this VPSHR Annual Report "Shell", "Shell Group" and "Group" are sometimes used for convenience to reference 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. These terms are also used where no useful purpose is served by identifying the particular entity or entities. "Subsidiaries", "Shell subsidiaries" and "Shell companies" as used in this VPSHR Annual Report refer to entities over which Shell plc either directly or indirectly has control. The terms "joint venture", "joint operations", "joint arrangements", and "associates" may also be used to refer to a commercial arrangement in which Shell has a direct or indirect ownership interest with one or more parties. The term "Shell interest" is used for convenience to indicate the direct and/or indirect ownership interest held by Shell in an entity or unincorporated joint arrangement, after exclusion of all third-party interest.

Nigeria

3. In Nigeria, Shell has interests in several companies that produce, distribute and export oil, gas, Liquefied Natural Gas (LNG) and other energy products. These entities are known as Shell Companies in Nigeria (SCiN). On 13 March 2025, Shell completed the sale of The Shell Petroleum Development Company of Nigeria Limited (SPDC) to Renaissance. Completion followed approvals from the Federal Government of Nigeria.
4. Shell continues to rely on Government Security Agency (GSA) who provide armed security for many of their facilities/activities. Armed security is assessed as necessary due to both the extreme threat environment, as well as government regulations mandating the use of armed security for all Critical National Infrastructure. Armed security is used for escort, maritime security, facility/asset security, and other company activity assessed as requiring the use of armed security to bring the risk to As Low As Reasonably Practicable (ALARP). Shell also employs unarmed private security personnel. Private security companies in Nigeria are legally barred from bearing arms and only perform civil guard duties within facility perimeters.
5. Implementation of the VPSHR in Nigeria included the following steps:
 - The VPSHR Threat Assessment, Risk Assessment & Implementation Plan, and Armed Security Approval were reviewed, and the Annual Questionnaire was updated.
 - VPSHR and Use of Force legal clauses were incorporated into all contracts with private security companies. Private security personnel received both VPSHR induction and refresher training.
 - GSAs deployed in support of SCiN activities were briefed on the VPSHR and use of force requirements. Periodic refresher sessions were provided, and a zero-tolerance approach to non-compliance was maintained.
 - SCiN's VPSHR commitments were explicitly stated in deployment letters to public security forces.
 - The General Manager Security held sessions with senior GSA personnel to discuss the provision of personnel and vehicles for escort duties, along with a reminder on adherence to the VPSHR and a review of the overall performance of their personnel.
 - Shell did not provide GSAs with any equipment that could be used for lethal purposes, such as firearms or ammunition.
 - The procurement of logistics support during GSA deployment (such as accommodation and vehicles) was restricted to supporting company activities. SCiN makes use of contractors to provide these equipment/services.

- Shell does not directly pay salaries or statutory allowances to GSA personnel. Instead, agreed reasonable allowances at approved daily rates are transferred to designated GSA institutional unit accounts. Cash payments are strictly prohibited.
- All transfers and payments were recorded and retained.
- Shell retains its Community Feedback Tool (CFT) post share-sale, with Shell Nigeria Exploration and Production Company Limited and Shell Nigeria Gas Ltd assets reporting into the tool. The CFT provides a structured process for receiving, responding to, investigating, and resolving all types of feedback (complaints, questions, requests) as well as positive feedback from communities affected by Shell's business activities. This includes feedback related to security.

Philippines

6. The Shell companies in the Philippines (SciP) represent various companies operating in oil and gas importation, storage, distribution and marketing, delivery to consumers and processing services related to finance, human resources, procurement, and customer service. Close protection agents are armed with firearms. The threat environment in the Philippines remains high, primarily driven by terrorism, criminality, and organised crime. The role of Country Chairman has been assessed as being exposed to the prevailing threats mentioned.
7. Implementation of the VPSHR in the Philippines included the following steps:
 - The VPSHR Threat Assessment, Risk Assessment & Implementation Plan, Annual Questionnaire, and Armed Security Approval were reviewed and updated by the Country Security Managers.
 - In 2025, the Security and Human Rights Advisor visited the Philippines for an internal line-2 audit on VPSHR. The audit revealed no serious findings, recommendations have been actioned and implemented by the team.
 - The security team continued to be in close contact with the Social Performance (SP) team, who track security-related entries in the CFT. The SP team are responsible for communicating security arrangements to fenceline communities. In particular, engagements were held with the local fishing community at the SHIFT terminal on the 50-meter safe distance within the port area.
 - Internal company engagements on VPSHR were held with the Country Coordination Team, Health, Safety, Security, and Environmental Managers, Shell Shareholder Representatives for Greenlight non-operated joint venture and the Worker Welfare team.

- In 2025, the Corporate Security Team audited the private security providers that provide services to SciP, including on training requirements, Key Performance Indicators (KPIs), security and human rights policies, incident review and reporting, spot checks, safety performance, and security protocols.
- VPSHR and Use of Force legal clauses are included in all contracts with private security providers.
- Executive protections personnel are armed with firearms. The use of armed security is assessed by Corporate Security as a viable and necessary way of reducing risk to ALARP and is approved by the Country Chair.
- A train-the-trainer VPSHR training pack was created by the Security and Human Rights Advisor and training was given to all by the Country Security Manager (CSM). CSM Philippines shared the pack with private security companies in-country and held refresher trainings.
- VPSHR and use of force posters (both in English and the local language) are visible in all man guarding posts and use of force pocket cards were distributed to all security personnel.

Brazil

8. With approximately 800 employees, we have a wide range of activities in the country: Upstream, Downstream, Marine, Gas and New Energies. In Upstream, Shell Brasil operates in post- and pre-salt. In Downstream, Shell Brasil has a 44% stake in JV Raízen, which holds the brand license for the mobility business, with more than 6,000 retail stations. Raízen is one of the world's largest sugarcane ethanol producers, responsible for more than 2 billion litres per year. Shell created a new company in 2017: Shell Energy Brasil, to commercialise electric energy.
9. Implementation of the VPSHR in Brazil in 2025 included the following steps:
 - The VPSHR Threat Assessment, Risk Assessment & Implementation Plan, Annual Questionnaire were reviewed and updated by the Country Security Manager.
 - In 2025, the Security and Human Rights Advisor conducted a review of the implementation of the Voluntary Principles in Brazil. Recommendations for improvement were shared with stakeholders and have since been addressed and implemented.
 - Regular internal engagements are conducted with Asset Protection Managers, Project Teams, Shell Shareholder Representatives, and Social Performance to discuss VPSHR requirements and the use of force.
 - VPSHR and Use of Force legal clauses are incorporated into contracts with private security companies and dedicated training is delivered to private security personnel.

- Shell liaises with private security providers on a quarterly basis to discuss KPIs, including security incident reviews, dropped shifts, performance reviews, and training requirements.
- Shell Brasil actively participated in the Voluntary Principles Initiative's Brazil In-Country Working Group and contributed to the annual IPIECA Social Responsibility Group meeting in Rio de Janeiro.
- Brazil is a reporting country in Shell's Social Performance-managed CFT, enabling monitoring of security related entries and collaboration with Social Performance on community related security concerns.
- At our non-operated joint ventures (JV Raízen), Corporate Security liaises with the Shell Shareholder Representative to ensure standards acceptable to Shell are implemented for VPSHR.
- This includes ensuring that: security risk management is conducted in accordance with the Voluntary Principles on Security and Human Rights; armed security is not used unless it is a legal or government requirement or there is no acceptable alternative to manage the risk; payments and/or resources provided to host governments for the provision of security to Shell are approved and recorded.

LESSONS LEARNED

- Shell continues to collaborate with, and influence, operating partners in non-operated joint ventures to advance implementation of the Voluntary Principles on Security and Human Rights (VPSHR). Key security and human rights risks are identified through Shell Corporate Security's VPSHR Risk Assessments, and recommended mitigations are communicated to operating partners via Shell Shareholder Representatives, Corporate Security counterparts, and relevant functional teams (Corporate Relations, Social Performance, etc.).
- The March 2025 divestment of SPDC to Renaissance has significantly reduced Shell's exposure to VPSHR-related risks in Nigeria. However, due to our continued reliance on armed government security forces and private security providers, Nigeria remains designated as a VPSHR Focus Country.
- Shell has strengthened its leadership role within the Voluntary Principles Initiative (VPI), assuming the position of Chair of the Corporate Pillar on the VPI Board in October 2025. Shell also participates actively in several VPI-led workstreams, including the Executive Director Search Committee and the Implementation Working Group developing draft guidance on security-related human rights due diligence.