



**Shell plc**  
**Statement under**  
**the Modern**  
**Slavery Act**  
for financial year ending  
31 December 2023

This is published by Shell plc and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.

#PoweringProgress

**This statement has been approved by the Board of Shell plc and each of its relevant subsidiaries, as listed, in compliance with the UK Modern Slavery Act. It was approved by the Board of Shell plc on March 13, 2024**

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The companies in which Shell plc directly and indirectly owns investments are separate legal entities. In this report "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. 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 report refer to entities over which Shell plc either directly or indirectly has control. The term "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.

#### **Relevant subsidiaries of Shell plc**

BG International Limited  
Derivatives Trading Atlantic Limited  
Enterprise Oil Limited  
Limjump Energy Limited  
Shell Catalyst & Technologies Limited  
Shell Chemicals U.K. Limited  
Shell Clair UK Limited  
Shell Energy Europe Limited  
Shell Energy UK Limited  
Shell Global LNG Limited  
Shell Information Technology International B.V.  
Shell Information Technology International Limited  
Shell International Ltd  
Shell International Petroleum Company Limited  
Shell International Trading and Shipping Company Limited  
Shell Research Ltd  
Shell Trading International Limited  
Shell Trading Rotterdam B.V.  
Shell U.K. Limited  
Shell Western LNG B.V.



# Introduction

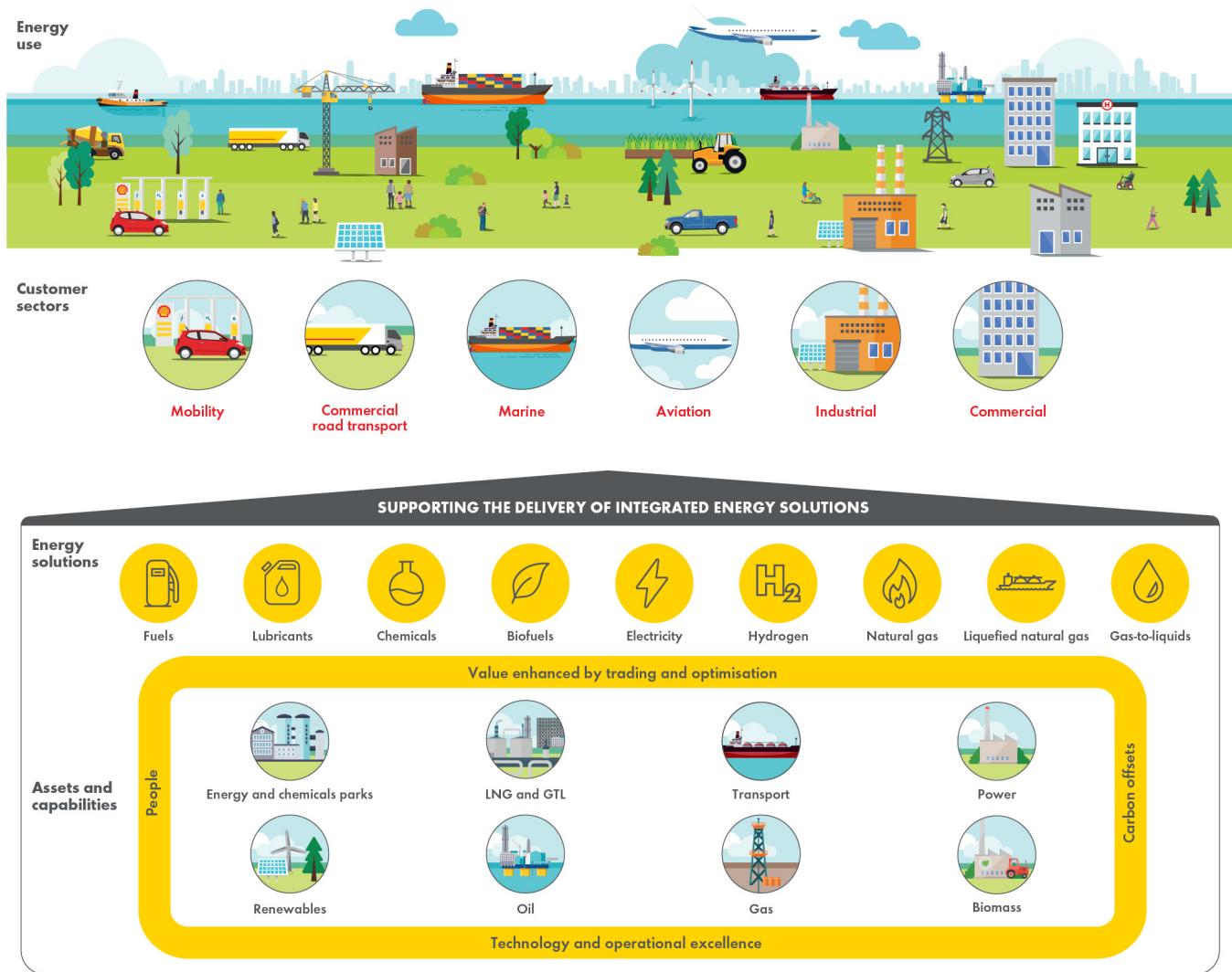


Shell is opposed to all forms of modern slavery. Such exploitation is against Shell's commitment to respect human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization's 1998 Declaration on the Fundamental Principles of Rights at Work. This is Shell's eighth published UK Modern Slavery Act statement setting out the steps we have taken against modern slavery in our business and supply chains.

## Our business and supply chains

Our operations are divided into our businesses: Integrated Gas and Upstream and, Downstream, Renewables and Energy Solutions. Projects & Technology manages the delivery of Shell's major projects and drives our research and innovation. Each of these organisations have supply chains that provide labour, goods, and services. We operate in more than 70 countries and employ around 103,000 people [A].

## Our business activities



[A] At December 31, 2023.

# Our organisation



## Integrated Gas and Upstream

Integrated Gas and Upstream (IGU) explores for and extracts crude oil, natural gas and natural gas liquids. It delivers hydrocarbon products from conventional oil and gas operations, deep-water exploration and production, liquefied natural gas (LNG) activities, and converts natural gas into gas-to-liquids (GTL) fuels and other products. The marketing, trading and optimisation of LNG are included in IGU. IGU provides the secure energy customers need and we aim to do this with lower emissions.



## Downstream, Renewables and Energy Solutions

Downstream, Renewables and Energy Solutions (R&ES) provides products and services to more than 1 million business customers. It includes Chemicals and Products, and Marketing, which includes Mobility – a business that serves around 33 million retail customers a day at more than 47,000 service stations. Marketing also includes Lubricants, and Sectors and Decarbonisation activities. Downstream and R&ES, underpinned by Trading and Supply, aims to meet the evolving energy needs of our customers.



## Innovation

Technological innovation is integral to our pursuit of more and cleaner energy solutions as we work towards becoming a net-zero emissions energy business by 2050. Projects & Technology (P&T) manages major projects, driving innovation, while delivering technical services to our businesses. P&T provides essential functional leadership across Shell, addressing safety and environment, contracting and procurement, and greenhouse gas emissions management. Our research and development activities also encompass safety, performance products, and automation and artificial intelligence.



## Procurement

Shell's procurement team comprises some 2,700 people. In 2023, we spent around \$44 billion on goods and services from around 24,000 suppliers globally. Our focus, for the purpose of this statement, is on our direct suppliers. Our procurement team aims to develop and strengthen relationships with contractors and suppliers who are committed to the Shell Supplier Principles or to equivalent standards through their own activities and the management of their own suppliers and subcontractors. Each of Shell's contractors and suppliers has its own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights.



Read more about our organisation in our Annual Report:

[www.shell.com/annualreport](http://www.shell.com/annualreport)

# Our values and policies

We recognise our responsibility to respect human rights in all aspects of doing business and have embedded human rights in the Shell General Business Principles, Shell Code of Conduct, and the Shell Supplier Principles.

Our approach is informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the 1998 Declaration on the Fundamental Principles of Rights at Work of the International Labour Organization (ILO), which covers; freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in respect of employment and occupation.

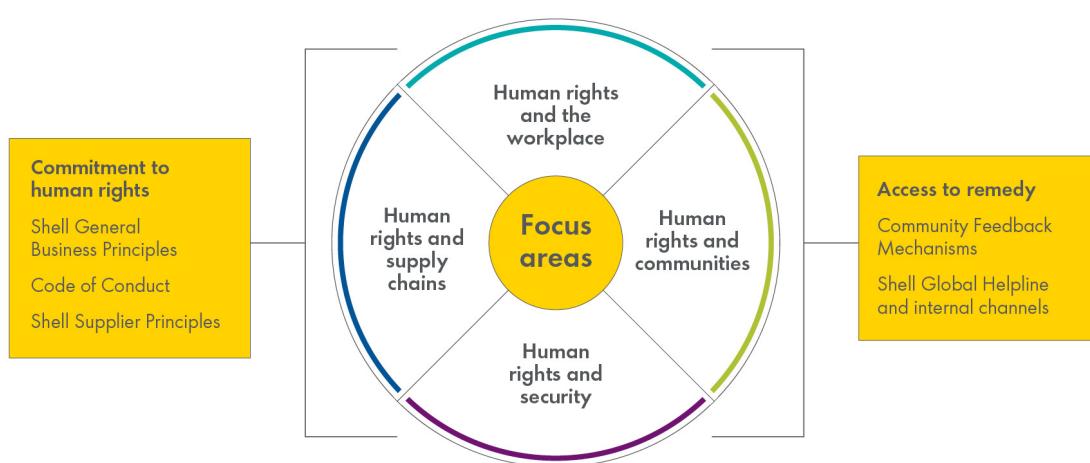
Where we have potentially caused or contributed to adverse impacts, we provide and facilitate access to remedy through our Community Feedback Mechanisms, the Shell Global Helpline, and cooperate in good faith through other channels facilitated by an independent provider. Shell does not require individuals or communities to permanently waive their legal right to bring a claim through a judicial process as a precondition of raising a grievance through a Shell grievance mechanism, nor will Shell otherwise take extrajudicial measures to obstruct state-based judicial processes. Our high-risk contracts contain requirements for the contractor to provide access to remedy provisions in accordance with our Worker Welfare ambition.

Our contractors and suppliers are required to 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 ILO. The Shell Supplier Principles further clarify the expectations we have from our suppliers and contractors on labour and human rights, including (but not limited to):

- 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.

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. When entering a joint venture operated by a partner, we expect them to apply standards, processes and principles that are materially equivalent to our own.

## Approach to human rights



### Human rights and the workplace

We respect our employees' and contractors' rights, including freedom from forced labour and non-discrimination by working in line with the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the UN Global Compact.

### Human rights and communities

Our activities can impact the communities where we operate. Through careful project design and responsible management we aim to minimise those impacts and avoid human rights infringements. We do this in line with the International Finance Corporation's Performance Standards and the UN Guiding Principles on Business and Human Rights. We work with local communities to jointly identify solutions and opportunities.

### Human rights and security

Shell aims to keep staff and facilities safe while respecting the human rights and security of local communities. We carefully assess the security threats and risks to our operations and work with governments and partners to provide a secure working environment. Shell only uses armed security in countries where the threats are most severe, or if it is a requirement under local laws.

### Human rights and supply chains

The Shell Supplier Principles outline what we expect from contractors and suppliers in areas such as human rights. This includes ensuring no use of forced, prison or compulsory labour or payment of recruitment fees by workers. The principles also ensure a safe, secure and healthy workplace for staff and contractors and payment of wages that meet or exceed national legal standards.

# Risk assessment

## Supply Chains

Shell assesses supply chain labour risk based on country and category risk. Supply chain country risk is derived from external indices provided by Verisk Maplecroft that indicate the risk of modern slavery both in country, as well as for migrant workers. Supply chain category risk has been determined by analysis of typical contract work-scopes, identifying those such as services where there may be higher risks of unethical labour practices in the recruitment of migrant workers by contractors or agents working on their behalf. Shell continues to strengthen its risk assessment to identify risks of modern slavery in our supply chains or where mitigations may be needed in our businesses, including in areas of new business development.

## Downstream retail

In our Downstream retail business, agreements with retailers, dealers, wholesalers, and licensees require such counterparties to abide by all relevant legislation, which includes the UK Modern Slavery Act where applicable.

## Trading and supply

In trading and supply, we have performed a risk assessment to identify our higher risk areas for modern slavery. In our biofuels and environmental products businesses where the biofuels and biofuels feedstock and carbon credits supply chains may pose an increased risk, the sustainability risk assessments we carry out on the feedstock, countries of origin and the underlying projects generating carbon credits, also include consideration of modern slavery risks.

Where the risk is high, a mitigation plan is developed. In addition, sustainability provisions are included in our biofuels and certain carbon credits purchase agreements, which include, amongst others, provisions relating to the prohibition of child labour and forced labour.

In shipping, all vessels used for bulk transport of oil, chemicals or gas and their derivatives are subject to the Requirement for the Quality Assurance of Maritime Vessels, which includes verification that the vessel and operators comply with applicable industry legislative requirements, including those related to seafarer wellbeing. Furthermore, we conduct assurance of all shipyards and maritime facilities that we do business with including criteria that specifically relates to Modern Slavery and Human Rights. For vessels which are managed by Shell, there are additional measures which are implemented including use of recruitment agencies that are accredited by the Maritime Labour Convention (MLC). The convention sets out seafarers' rights to decent working conditions and recruiters are subject to regular verification and audit from Shell's ship management team. Seafarers on our managed vessels also receive Shell's Fleet Officer Handbook which covers the MLC and helps them understand their working rights. Further audits are performed onboard ship to ensure compliance with contractual obligations and working procedures, such requirements being additionally checked by Port State Control and Flag State Control.

For all contracted services within the shipping part of our supply chain, Shell employs the Worker Welfare program which lays out minimum criteria in relation to Shell employees and contractor workers on Shell operations including maritime assets, facilities and projects.



Read more about our worker welfare programme:

<https://www.shell.com/sustainability/communities/worker-welfare>

# Due diligence

We recognise the role of counterparty due diligence in bringing our commitments to life. Across Shell and in our supply chains, all direct suppliers undergo pre-contract screening, and this includes screening against sanctions lists and adverse media checks where reports of modern slavery and human rights abuse could be identified.

Our manual on worker welfare in our management system, the Health, Safety, Security, Environment & Social Performance (HSSE & SP) Control Framework, defines the steps we take with our suppliers to assess and mitigate labour rights risks, including those of modern slavery. The manual requires an assessment of worker welfare risks.

The HSSE & SP Control Framework is being transitioned to our new Safety, Environment & Asset Management (SEAM)

## Health, Safety, Security, Environment & Social Performance Control Framework

The HSSE & SP Control Framework defines mandatory standards, requirements and accountabilities. The framework applies to Shell entities and Shell-operated ventures, including employees and contractor staff.

Mandatory manuals describe:	• Purpose of the manual • Accountabilities and responsibilities	• Scope • Requirements to be met
 HSSE & SP Management System	 Health	 Personal Safety
 Process Safety	 Environment	 Social Performance
 Security	 Product Stewardship	 Transport
 Contractor HSSE Management	 Projects	 Resources

 Shell Commitment and Policy on Health, Security, Safety, the Environment and Social Performance:  
[www.shell.com/sustainability/our-approach/commitments-policies-and-standards](http://www.shell.com/sustainability/our-approach/commitments-policies-and-standards)

Contractors and suppliers deemed to be at higher risk for labour rights issues are engaged to undertake a detailed assessment of their labour rights management system prior to the award of a contract. This assessment questionnaire has been developed in collaboration with the Norwegian Oil and Gas Operators Association (NOROG). It includes a declaration of suppliers' own processes to assess and manage labour rights risks with their own suppliers. Shell continues to collaborate with its peers in creating a joint approach to human rights supplier assessments. The International Association of Oil and Gas Producers (IOGP) has added the assessment questionnaire to their suite of pre-qualification questions. We promote the initiative through our membership of Ipica, the global oil and gas association for advancing environmental and social performance and energy transition.

The results of these supplier assessments performed by Shell's procurement team are summarised in a rating depending on the number and significance of any gaps between our requirements and the supplier's policies or performance. The most common areas of improvement found during our supplier assessments typically relate to the following:

- freely chosen employment [B];
- child labour avoidance;
- working hours, wages and benefits;
- dormitory, housing and working conditions;

- humane treatment, equal opportunities and freedom of association; and
- supply chain and performance management.

To address this, we contractually require suppliers and contractors to develop a worker welfare plan to ensure compliance with the Building Responsibly principles [C]. That includes actions to address ethical recruitment practices and no use of forced labour, as well as any gaps identified in the assessment of their management system. Building Responsibly has detailed guidance for every principle. In addition, we require industry recognised standards, such as the International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD)'s joint guidance note on Workers' Accommodation Processes and Standards, for the design of worker accommodation and facilities. We also have additional internal guidance that establishes minimum global standards with emphasis on the elements of worker welfare and respect for people.

In our procurement contracts, contractors and suppliers agree to adhere to the Shell General Business Principles, the Shell Supplier Principles and the Shell Code of Conduct. Suppliers are required to comply with all applicable laws and regulations and agree to provide and maintain safe and healthy working conditions for all supplier personnel.

[B] Forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used

[C] <https://www.building-responsibly.org/worker-welfare-principles>

# Effectiveness and performance management

Through our procurement team's supplier qualification process, contractors or suppliers may be subject to on-site audits, which could be announced or unannounced, and which may be performed by either Shell personnel or third-party auditors. In addition, we run Health, Safety, Security, Environment & Social Performance Control Framework audits (self-assessments, peer reviews and independent audits) to verify compliance with our Worker Welfare Manual.

In 2023 we launched a new internal reporting mechanism, as part of our existing health and safety reporting system, to allow both staff and contractors at site to raise worker welfare concerns.

We investigate allegations of practices running contrary to the Shell Supplier Principles that are raised with us. These may result in suppliers being required to develop corrective action plans backed up by on-site audits. In addition, our model procurement contract allows for termination with immediate effect if suppliers breach Shell General Business Principles. On an annual basis, we collect performance data against internal mandatory requirements such as the Shell General Business Principles and our Code of Conduct.

Senior Shell representatives are required to confirm such performance data where Shell is the operator or has a controlling interest.

We report annually through our Sustainability Report the percentage of countries in which we operate where we have procedures in place to prevent child labour and forced labour, and for 2023 reported 100%.

Shell has specialists who investigate concerns or allegations about a breach of our Code of Conduct. If a violation is confirmed, we take appropriate action up to and including contract termination or dismissal. We maintain a stringent, no-retaliation policy to protect any person making a good faith allegation.

We are working closely with industry associations to help raise the bar and drive consistency across the industry on worker welfare and labour rights in the industry. As an official supporter of Building Responsibly we continue to support them with running a practice sharing network with contractors, to enable wide practice sharing across many companies and industries. We also work closely with IOGP and Ipieca, who have become supporters of Building Responsibly. In Ipieca we were instrumental in setting up a working group to address Worker Welfare challenges in our industry, together with IOGP, particularly in relation to ethical recruitment and worker engagement

Shell is a member of the Business for Social Responsibility (BSR) human rights working group which provides an opportunity for a cross sector group of companies to openly share best practices, challenges, questions, and experiences implementing the UN Guiding Principles on Business and Human Rights across a diverse range of operational environments. In addition, BSR is a member of Shell's Human Rights Working Group, providing advice and challenge to our approach on human rights across Shell, including in our supply chains.

We have used our memberships of bodies including Ipieca, IOGP, the International Organisation of Employers (IOE), The Conference Board, the United Nations Global Compact Action Platform on Decent Work in Supply Chains, and our attendance and participation at the UN Annual Forum on Business and Human Rights, to test our approach, learn from others and contribute to the development of good practice that may be used both in our own business and with our suppliers.

## Training

With limited exception, 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. Both the Code of Conduct and Shell General Business Principles are available on our website in several languages.

As described above, attention to Modern Slavery and related human rights issues are an integral part of our contracting and procurement process. There is training provided for contract personnel to gain visibility on up-to-date accurate supplier information. Following the completion of assessments on their suppliers, our staff who manage contracts with a higher labour rights risk may be given individual coaching and support on how to manage supplier corrective action plan.

In 2020, we rolled out specific Worker Welfare training for staff at sites who are responsible for managing contractors, and for worker welfare assessments and plans. For our suppliers we have developed a Worker Welfare information pack to enhance their understanding of how to manage Worker Welfare and Labour Rights when working for Shell. We have supported Building Responsibly and Ipieca in the joint development of labour rights training which we offer, free of charge, to

all our contractors. In 2023, we continued to work on our salient human rights issues (salient human rights are those that are most at risk from our operations). We prioritise four focus areas where respect for human rights is critical to how we operate: communities, security, the workplace including labour rights, and supply chains.

Shell employees working in these focus areas need to complete mandatory human rights training. About 1,750 nominated employees had completed the training between its launch in 2021 and the end of 2023, which is 94% of all those that have been assigned the training.

In addition, we encourage all employees to complete the course regardless of their role, to build greater understanding of human rights across Shell.



Read more about our approach to worker welfare here:

[www.shell.com/sustainability/communities/worker-welfare](http://www.shell.com/sustainability/communities/worker-welfare)



**For more information read our webpages:**

Shell Powering Progress

[Read more at this link](#)

Shell General Business Principles

[Read more at this link](#)

Shell Code of Conduct

[Read more at this link](#)

Shell Supplier Principles

[Read more at this link](#)

Shell Sustainability Report

[Read more at this link](#)

Worker welfare in Shell

[Read more at this link](#)

Human rights in Shell

[Read more at this link](#)

The Shell Global Helpline

[Read more at this link](#)

For and on behalf of Shell plc

**Wael Sawan, Chief Executive Officer**

Date: 19/03/2024