Company: Shell PLC

Submission date: 02 March 2023

In response to:

We are writing from <u>Business & Human Rights Resource Centre</u> in London to invite Shell plc to respond to allegations of importing Russian oil through Turkish refineries after embargo had been imposed. More information can be found in the article mentioned below and we hope to publish your response alongside it, when we draw international attention to this issue in our Weekly Update to be released on Wednesday 8 March 2023.

Shell & Vitol bring Russian-origin diesel into Europe, despite swearing off Russian oil, 19
 February 2023. Global Witness: https://www.globalwitness.org/en/campaigns/stop-russian-oil/

Shell PLC response:

"We remain fully committed to our pledge and have stopped purchases of Russian origin crude, as well as cargos of refined products exported from Russia. It is a decision we made with conviction, carefully aligned with government guidance and in compliance with sanctions, which do not exclude purchasing products refined from Russian crude in third countries where this is legally permitted.

"We acknowledge the difficult dilemma that governments face between putting pressure on the Russian government and ensuring stable, secure and affordable energy supplies for consumers in the rest of the world, including Ukraine."

ENDS

Background Information:

- We have already stopped purchasing Russian-origin petroleum products. Through a range of
 controls, including strict no Russian-origin product contract clauses with suppliers, we seek
 to avoid any fuels that may contain products refined in Russia (ie where they may have been
 blended further up the supply chain).
- Other refinery-operating companies in third countries may import Russian crude to transform it. Often this is done in refineries using a mix of crude feedstocks from different sources. In compliance with sanctions and aligned with government guidance, Shell does not currently exclude purchasing products that may have been refined from Russian crude by third parties in such countries.
- To be clear, products manufactured outside Russia are not considered Russian origin. For
 instance, under US Customs laws "Russian Federation origin" excludes goods that have been
 "incorporated or substantially transformed into a foreign-made product". We will always
 comply with applicable sanctions and local laws.