

Subject: Letter of Response to Joint Communication from Special Procedures

Reference is made to your letter of 2 July 2025 with reference AL OTH 61/2025.

Shell has been active in Nigeria since 1937 and, over that time, has invested in multiple companies involved in the development and production of oil, gas, liquefied natural gas (LNG) and other energy products, often in a pioneering role and at the forefront of the development of Nigeria's energy sector.

Over this time, Shell Companies in Nigeria made substantial economic and social contributions to the Nigerian economy, contributing to Nigeria's GDP growth through the procurement of goods and services and the employment of a large workforce. Furthermore, the Shell Companies in Nigeria actively developed the technical capability of their Nigerian staff and made other contributions to Nigerian society, especially in education and other social sectors.

The Shell Group of Companies have embedded respect for human rights in the Shell General Business Principles and their Code of Conduct. Shell is committed to respecting human rights, as set out in the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Our approach is informed by the UN Guiding Principles on Business and Human Rights.

In March 2025, Shell announced completion of the sale of The Shell Petroleum Development Company of Nigeria Limited (SPDC) to Renaissance Africa Energy Holding Limited. The divestment aligns with Shell's global strategy and its intent to focus future disciplined investment in Nigeria in its offshore deep-water and integrated gas businesses. Shell remains a major investor in Nigeria, supporting the country's energy needs and its economy.

Renaissance is a consortium of five Nigerian exploration and production companies and an international energy group. It brings significant experience in oil and gas exploration and production operations in Africa, including in the specific context of the Niger Delta. The Renaissance leadership is also comprised of former Shell staff with extensive technical expertise in the operating environment in Nigeria.

Following completion of the divestment SPDC was renamed Renaissance Africa Energy Company Limited. The roles and responsibilities of the joint venture partners are unchanged. Hence Renaissance continues to hold a 30% stake in, and to operate, the unincorporated joint venture with the government-owned Nigerian National Petroleum Company Limited (NNPCL) (55%), Total Exploration and Production Nigeria Limited (10%) and Agip Energy and Natural Resources Nigeria Limited (5%) as its partners.

The divestment was designed to preserve the full range of operating capabilities of the operator of the joint venture, which includes the technical expertise of its staff, and the management systems and processes that Renaissance uses. Renaissance will continue to be accountable for its share of commitments within the joint venture which includes conducting any clean-up and remediation where spills may have occurred in the joint venture's operations.

Shell takes care to invest and divest responsibly and to screen its transactions and counterparties against multiple criteria, including the counterparty's technical and financial capability. Our internal acquisition and divestment processes are described in the 2024 Annual Results and Accounts. Furthermore, the divestment was subject to approval by the Federal Government of Nigeria. The Government conducted its own due diligence and probed various aspects of the buyer and the transaction. Upon completion of its extensive review, it granted its approval in 2024 in accordance with the applicable regulations.

Shell has been, and will continue to be, open to dialogue with all societal stakeholders on these important topics. We trust that this letter helps address any concerns with respect to the recent divestment in Nigeria.

Shell sees significant overlap between the information you have received and allegations made in a case that Shell plc and Renaissance are currently defending in the English Courts. We dispute the accuracy of the facts and circumstances set out in your letter. We also disagree with the letter's incomplete and out-of-context description of the preliminary issues judgment handed down by the English Court in June 2025. The Court has not yet made any ruling on the merits of the case, and the trial is scheduled to take place in 2027. You will appreciate that we are unable to comment further on the matters which are before the English Courts.

Shell International Limited, London, 26 August 2025