

# Reporting options (NL) for suspected violations of the Code of Conduct, of the Law, of the Shell General Business Principles and for undesirable situations or events

Shell has a policy to prevent violations of the [Code of Conduct](#), of the Law, of the [Shell General Business Principles](#) and to prevent and combat undesirable situations.

On this page you will find information about what you can do to report a suspected violation. Or what you can do if you experience events or situations that are undesirable.

- Who can use these reporting options?
- What can you do?
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- What are undesirable manners?
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- Undesirable situations in the field of HR, employment conditions and processes.
- Where can you go if you are confronted with an undesirable event in the field of HR, employment conditions and processes?

## Who can use these reporting options?

- All employees with an individual employment contract and those who otherwise (temporarily) work for a Shell company in the Netherlands.
- All contractors. However, the content of their request must be limited to dealing with colleagues and managers and cannot focus on the legal position and/or employment relationship with the manager.
- The Global Helpline can also be used by Shell customers, suppliers, and agents.

From a practical point of view, the term employee is used for all groups.

## What can you do?

If you would like advice on an issue relating to suspected violations of the Code of Conduct, of the Law, of the General Business Principles or if you would like advice on undesirable situations or events in the workplace or if you would like to report any other issue, please contact your line manager, the Shell Ethics & Compliance Office, a representative of Human Resources, Shell Health or Shell Legal.

The employee can also contact a Confidential Advisor or the Complaints Committee. Or you can report to the [Shell Global Helpline](#). The different options are described in the sections below.

Anyone involved in the handling of an incident as described below is bound by strict confidentiality.

## What are the consequences of undesirable manners?

Where people work together, there can always be a difference of opinion about the mutual cooperation. Everyone has their own ideas about what can and cannot be done in daily manners.

Undesirable manners can deeply affect the private lives of everyone involved, but they also have consequences for the organization. People are distracted from their work, become unmotivated and can become unfit to work or even resign as a result of undesirable behavior and the anxiety that this evokes.

The section *What are undesirable manners* indicates what Shell considers to be undesirable interactive conduct and what an employee who feels inconsiderately treated can do.

## What is undesirable interactive conduct?

Undesirable manners are unwanted intimate, humiliating, harassing, hostile or discriminatory behavior directed against an employee. Unwanted manners can be physical, psychological, verbal, or non-verbal. This can also be emails or messages on social media that are perceived as unwanted intimate, humiliating, harassing, hostile or discriminatory. The determining factor is that the activity or situation, is

perceived by the person concerned as undesirable and is related to the work situation. Examples include (sexual) harassment, aggression, and violence, bullying and discrimination.

#### *Sexual harassment*

Sexual harassment is understood to mean: unwelcome sexual approaches, requests for sexual favors, or other verbal, nonverbal or physical behavior comprising any one of the following features:

- Submission to such behavior is used, either explicitly or implicitly, as a condition of the victim's employment;
- Submission to or rejection of such behavior by the victim is used or co-used as a basis for decisions that affect the victim's work;
- Such behavior is intended to affect the victim's work performance and/or creating an intimidating, hostile or unpleasant work environment, or has the effect of impairing the victim's work performance and/or creating an intimidating, hostile or unpleasant work environment.

#### *Aggression and violence*

Aggression and violence are incidents in which someone is psychologically or physically harassed, threatened, or attacked.

#### *Bullying*

Bullying is hostile, humiliating, or intimidating behavior, which constantly directed at the same person. It happens often and over a longer period of time. The targeted person has no effective defence against it. Examples of bullying behavior are: isolating someone socially, making the work unpleasant or impossible, ridiculing someone and spiteful gossip (backbiting).

#### *Discrimination*

Discrimination on any grounds is prohibited. It is provided by law that a person may not be treated unequally because of religion, beliefs, political opinion, race, sex, nationality, sexual orientation, marital status, disability, or chronic illness, working hours (full-time or part-time work), type of contract (permanent or temporary) or age.

The prohibition applies to both direct and indirect distinctions. This is unless the law makes an exception to this or there are objective justification grounds for the distinction.

### **Where can you go if you are confronted with undesirable manners?**

Shell does not tolerate undesirable behavior. If an employee is the victim of sexual harassment, aggression, and violence, bullying or discrimination or any other form of undesirable behavior, something can be done about it. The victim can personally address the person acting inconsiderately. Perhaps the person does not realize at all that the behavior is hurtful. If the employee finds it difficult to enter into such a conversation, several opportunities are offered to talk about the undesirable situation and (possibly) to take action.

#### ***Option 1: Direct working environment***

The employee discusses the situation with the (direct) line manager, HR advisor and/or Shell Health, such as company doctor or company nurse or an advisor from [Resilians](#).

#### ***Option 2: Local Confidential Advisors***

If the above option is not desired or has not yielded anything, the employee can contact the Confidential Advisor in the work location. In consultation and with the consent of the person concerned, the Confidential Advisor will examine which steps can or should be taken.

Below you will find an overview in which it is indicated per location who the Confidential Advisor is and how to reach them, with a detailed description of the role and responsibilities of the Confidential Advisor.

Click [here](#) for the overview of Confidential Advisors.

#### ***Option 3: National Confidential Advisors***

In addition to the local Confidential advisors, Shell also has two national Confidential Advisors in the Netherlands. The names of these Confidential Advisors can be found [here](#).

One of them can be contacted if options 1 and 2 are not desired in the opinion of the employee. The national Confidential Advisor is particularly to be thought of in cases that transcend locations.

#### **Option 4: Shell Global Helpline**

The [Shell Global Helpline](#) allows Shell employees and other data subjects to report on a confidential basis concerns about compliance with or suspected violations of the Code of Conduct, of the Law, of the General Business Principles, or of undesirable situations or events in the workplace.

As an employee you can, anonymously if you wish, contact the Shell Global Helpline. It is available 24 hours a day, seven days a week and is staffed by an independent third party who can provide assistance in multiple languages.

Once a complaint has been registered with the Global Helpline, we are guided by the [Shell PLC Investigation Principles](#) and [CoC Incident Management](#). Please find more information at [Shell Internal Audit & Investigations - Methodology and tools](#).

An acknowledgement of receipt will be provided within 72 hours of submitting a report to the Shell Global Helpline. Reporters will need to choose a password and receive a report key so that they can track the status of their entry. Within three months of submission, the reporter receives feedback/a status update, subject to legal considerations and confidentiality requirements. Only members of the Business Integrity Department (BID) and Human Resources professionals have the authority to direct, manage or conduct incidents related to the Code of Conduct, the Law, the General Business Principles or incidents surrounding undesirable situations or events and they may seek the assistance of other functions or third-party specialists.

When contacting the Shell Global Helpline online or by telephone, you can report your concern about a situation or event in Dutch. Keep note that when you call and want to speak in Dutch, you may need to speak via an interpreter.

In addition, when you report your concern via the Shell Global Helpline at +31 800-266-7272, you can also ask for the "local reporting" option. In the web form, you can also select the "local reporting" option or submit a request in the "PLEASE DESCRIBE YOUR CONCERN" section of the Shell Global Helpline intake questions. [For more information click here](#).

When you have selected the "local report" option during web or telephone submission, your report will be routed to a local Dutch-speaking investigator from the Business Integrity Department (BID) (or by exception a local Dutch-speaking HR advisor) for further assessment and, if applicable, for investigation.

If you wish, you can also request a personal discussion with a local Dutch-speaking BID investigator (or by exception an HR advisor) at a location in the Netherlands (to be agreed). A request for such a personal discussion at a location can be made in the "PLEASE DESCRIBE YOUR CONCERN" section of the Shell Global Helpline's intake questions, or by indicating this, when you submit your concern via telephone.

Reference is also made to [frequently asked questions](#) about the handling of CoC incidents [on the Report a Concern](#) site on the Hub.

As mentioned above, if you would like advice on any matter relating to suspected breaches of the Code of Conduct, of the Law, of the General Business Principles you can speak to your line manager, the Shell Ethics & Compliance Office, a Human Resources, Shell Health, or Shell Legal representative. In the Netherlands, you can also contact a Confidential Advisor for support with and advice on concerns you might have. For matters not related to potential breaches of the Code of Conduct, such as complaints about Human Resources processes, you have the option in the Netherlands to report your concern to a local Complaints Committee. We refer to [this link](#) for further info.

In certain events, a concern of wrongdoing can be reported externally to a competent authority as well. The [Dutch Whistleblowers Authority](#) can be requested for further advice on the requirements, competent authority and/or procedure.

**Option 5: Complaints Committee**

The employee may decide to log a complaint with the local Complaints Committee. A situation of undesirable behavior is preferably submitted to the Shell Global Helpline. It is not possible to submit a complaint that has been handled by the Complaints Committee to the Shell Global Helpline or vice versa.

Click [here](#) for the Complaints Regulations, which describe the complaints procedure.

Below you will find an overview in which the members of the Complaints Committee are indicated per company, location, or business. Here you will also find a detailed description of the role and responsibilities of the Complaints Committee.

Click [here](#) for the overview of the Complaints Committees.

**Undesirable situations in the field of Human Resources, employment conditions and processes**

It is possible that the employee disagrees with the individual application of a personnel arrangement or procedure, or other decision in the field of HR affected the one personally. This explicitly concerns the individual application of HR employment terms and benefits and HR processes and not the terms and benefits or the HR policy itself. Below is indicated what the employee can do in such a situation.

**Where can you go if you are confronted with an undesirable event in the field of employment conditions and HR processes?**

To report an undesirable event or situation in the field of employment conditions or HR processes, you can choose one of the possible reporting routes as mentioned above. An undesirable situation or event in the field of employment conditions and HR processes is not handled by the Shell Global Helpline, but by the Complaints Committee.

