

Purpose of the Helpline

The core values on which Shell companies are founded are honesty, integrity and respect for others. Our reputation will only endure if we act with honesty and integrity in our activities and transactions, and if we always do what we believe is right in the legitimate execution of our activities.

There may be instances where a member of our staff, concerned about a matter or in need of clarification, or faced with a dilemma in relation to compliance with national or European laws, or our Shell General Business Principles (SGBP) or our Code of Conduct is unsure of what to do. He/she may have witnessed or become aware of a situation where a Shell company (*) or one or more of its employees do not comply with a national or European law, with our SGBP or our Code of Conduct.

The Global Helpline is intended to assist our staff and other third parties in raising such concerns or dilemmas, and/or seeking advice on such matters in confidence and without fear of retaliation. Shell's Global Helpline makes it easier to communicate such issues and helps to handle alerts more seamlessly. However, Shell France has local points of contact if the staff member or third party specifically requests that their alert be dealt with locally. However, the Alert Report may then be processed at any time by a global team in accordance with Shell's internal procedures, in particular where the alleged situation is serious or complex or requires expertise or resources that are not available locally.

**Companies in which Shell plc has direct or indirect interests are separate entities. In this document, the terms "Shell", "group" and "Shell group" are sometimes used for simplicity when referring to group companies in general. Similarly, the expressions "we" and "our" always refer to group companies in general or to those who work there. These expressions are also used when it is unnecessary to identify a particular company.*

1. What is Shell Helpline?

The Shell Helpline enables Shell employees and partners to report behaviours or situations that may be contrary to the law, our SGPB or our Code of Conduct, confidentially and without fear of retaliation, as required by French law**.

***In accordance with French law, whistleblowers defined in I of Article 6 of Law No. 2016-1691 of 9 December 2016 as modified benefit of a protective status when the legal conditions are met.*

2. How do I use the Global Helpline?

You can ask for advice or clarification and especially report any wrongdoing, violation of laws, our SGPB or of our Code of conduct, in several ways. You can talk to your line manager or an advisor in our legal or human resources departments, or your compliance officer. You can also report to an external body (see point 8). However, if you prefer to contact someone else, you can use this helpline.

In order to comply with French legislation, it is recalled that this system is open to any physical person who reports or discloses, without direct financial consideration and in good faith, facts that have occurred or are very likely to occur in the entity concerned (the "Information") concerning:

- a felony or misdemeanour;
- a threat or harm to the public interest;

- a breach or attempted concealment of a breach of an international commitment duly ratified or approved by France;
- a breach or attempted concealment of a breach of a unilateral act of an international organization taken on the basis of such an undertaking;
- a violation or attempted concealment of a violation of European Union law, law or regulation (including competition law, export and import law, anti-money laundering regulations, intellectual property infringement, theft, fraud, misuse of assets or company assets, falsification of accounts, conduct contrary to the interests of the environment, safety, health, safety, discrimination, harassment);
- the existence of conduct or situations contrary to the company's SGBP and Code of conduct that amount to crimes and offences, for example acts of corruption or influence peddling.

The alert may not, however, relate to elements covered by national defence secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of investigations, including judicial investigation or the client - lawyer confidentiality.

This helpline is not intended for purely local human resources issues (e.g. on individual working conditions or performance evaluation) or labour relations which should be dealt with local management or according to national procedures.

3 Who can use the helpline?

The helpline is intended for staff members, persons whose employment relationship has ended, persons who have applied for employment, external and occasional collaborators, contracting parties of the entity concerned, their subcontractors, any other third party as provided for by law, and who have obtained, in the course of their professional activities, Information as referred to in point 2 above and relating to events that have occurred or are very likely to occur in the entity concerned.

Where the Information has not been obtained in the course of professional activities, the person must have had personal knowledge of such Information.

This device should not be used for customer complaints or customer service requests.

4. How to report via the Shell Helpline?

The Shell Helpline is available 24 hours a day, 365 days a year. Calls and reports via the Helpline are received on behalf of Shell by an independent specialist support provider, Navex company.

There are two ways to report to the Shell Helpline:

1. Visit the Helpline website: You can submit a report on this secure website using a form to submit your question or concern. The website is available in 19 languages and is available to third parties as well as Shell employees.

2. Call the Shell Global Helpline using the Country Specific telephone number listed on the following website: <https://secure.ethicspoint.eu/domain/media/en/gui/109403/phone.html>. You can call the helpline toll-free from any country in which Shell operates. If requested, an interpreter may be brought into the conversation to assist the English-speaking interviewer. If you do not hear an invitation for the required language, say the name of the required language when you connect with the interviewer.

It is specified that an oral report may be made by telephone and, on request and according to your choice, at a videoconference or a physical meeting organized no later than twenty working days after receipt of your request.

In order to deal effectively with the alert, it is strongly recommended that you identify yourself. In the event that you wish to remain anonymous, you can make a report without your name being registered.

Anonymous alerts will only be processed if they contain sufficient information; if not, communication with the anonymous reporter is maintained via the Shell helpline (see below) to compensate for this lack of information. The information must remain factual and directly related to the subject of the alert.

Provide as much information as possible about your concerns, but keep it relevant, especially if you are making an allegation about someone else. The information collected will only be passed on to those who need to know it to carry out the investigation and take the necessary measures. Elements likely to identify the issuer of the alert may not be disclosed.

5. What happens when I contact Shell Helpline?

Reporting a concern, whether online or over the phone, results in a report that is forwarded to Shell. Before submitting your report, you will be required to choose a password. After the submission, you will instantly receive a Report Key. The Report Key and Password will allow you to follow up on the status of your Helpline report (online or by phone), and to find out if it is necessary to provide additional information. You will receive an acknowledgement of receipt within 72 hours of submitting a report to the Global Helpline.

Any oral reports shall be recorded, as follows:

- When collected via the Shell Helpline telephone line, by documenting the conversation in the 'report details' section accessible with your tracking number;
- When it is collected as part of a videoconference or a physical meeting, by establishing a meeting report.

The reporter shall have the possibility to verify, correct and approve the report.

The recipient of the alert verifies that the alert corresponds to the conditions set by law (nature of the facts and ability to report). To this end, the recipient may request any additional information from the reporter.

In the event that the alert does not meet the conditions set by law, the recipient will inform the reporter, specifying the reasons why the report does not comply with these conditions, and will close the file.

6. What happens when an alert report is sent to Shell?

If the report is a matter or situation for which advice is sought, it will be forwarded to a person qualified to provide that advice, such as a designated subject matter expert or a member of our legal teams.

In the event that the report meets the conditions set out in points 2 and 3, whether anonymous or not, it is forwarded to a coordinator of Shell's Ethics and Compliance team at the global level (or local, where specifically requested by the reporter) who will assess the report and assign it to a specialist manager to decide on the appropriate action.

If the report is likely to raise a situation provided for in 2° above, an investigation will be conducted in line with the applicable Shell policies by the Business Integrity Department or the Human

Resources team. If the reported incident requires expertise that is not available within Shell, an external expert may be involved under the same strict confidentiality.

The investigation will focus on an objective and factual analysis of the case. The details of the case, and in particular the identity of the person who was the subject of the report as well as any other person mentioned in the report, are kept confidential and shared only on a strict need-to-know basis.

For efficiency purposes, alert reports processed at local level may at any time be forwarded to a global team for processing, in accordance with Shell's internal procedures, in particular when the reported situation is severe or complex or requires expertise or resources that are not available locally.

Shell will provide you in writing, within a reasonable period not exceeding three months from the acknowledgement of receipt of the report, information on the measures envisaged or taken to assess the accuracy of the allegations and, where appropriate, remedy the subject matter of the alert and the reasons for it.

Where the allegations are substantiated, the Shell company concerned will decide on the measures to be taken to remedy the subject matter of the report. Where the allegations are inaccurate or unfounded, or if the report has become redundant, Shell will close the report. In any case, you will be informed in writing of the closure of the report via the Shell Global Helpline website.

7. Confidentiality and guarantee against retaliation:

The identity of the reporter is treated confidentially.

The procedure for collecting and processing reports shall ensure strict confidentiality of the reporter(s), of the persons targeted by the report, of any third parties mentioned in the report and of the information collected by all the recipients of the report.

Elements likely to identify the reporter may only be disclosed (apart from the authorised persons responsible for collecting and processing the report) with the latter's consent. They may, however, be communicated to the judicial authority, where the persons responsible for collecting or processing reports are required to report the facts to the latter. The reporter is then informed, unless this information would jeopardise the legal proceedings.

The use of the Shell Helpline is optional. If you choose not to use it, it cannot result in any sanction against you as an employee. The use in good faith of the device, even if the facts subsequently prove to be inaccurate or do not give rise to any follow-up, will not expose its author to any disciplinary sanction or reprisals, threats or attempts at reprisals. Misuse of the device, on the other hand, may expose the reporter to disciplinary sanctions as well as legal proceedings.

8. How can I report a behaviour or situation externally?

You can send a report externally, either after making the internal report, or directly by contacting:

- 1 ° The competent authority among those designated by the regulations in force (in particular the Directorate General for Competition, Consumer Affairs and Fraud Control, the High Authority for Health, the National Commission for Informatics and Freedoms, the General Directorate of Labour or the General Delegation for Employment and Vocational Training);

- 2° The Defender of Rights, who will direct you to the authority or authorities best able to know;

- 3° The judicial authority;

- 4° An institution, body, office or agency of the European Union competent to collect information on infringements of European Union law.

You will find more information on the list of authorities empowered in this capacity, in the annex to Decree No. 2022-1284 of 3 October 2022 on the procedures for collecting and processing reports issued by whistleblowers and setting the list of external authorities established by Law No. 2022-401 of 21 March 2022, available on www.legifrance.gouv.fr

Last modified: December 2023