

DE BRAUW  
BLACKSTONE  
WESTBROEK

**By courier**

Stichting Greenpeace Council  
a.k.a. Greenpeace International  
Attn. Mr Kumi Naidoo, President  
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Date 20 July 2012

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Our ref. M14170661/1/20537514

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Re: Shell/Greenpeace (our ref: 20537514)

Dear Sirs,

We act for *Shell Nederland Verkoopmaatschappij B.V.* ("SNV") of Rotterdam, and must ask your immediate attention for the following.

SNV and related Shell companies which it represents in this matter (jointly: "Shell") strongly object to recent actions carried out by Greenpeace International and its foreign offices and members (jointly: "Greenpeace").

Shell supports the rights of all people to engage in a free and frank exchange of views and to engage in lawful, peaceful protest. However, many of the actions taken by your organisation around the world do not constitute legitimate protest: these actions have posed a real risk to the health and safety of Shell retailers, staff, customers, the protesters themselves and indeed the general public.

We would like to address two issues in particular:

**Shell premises**

On 13 July 2012 Greenpeace members trespassed upon Shells' Headquarter premises in The Hague. The included members accessing the offices themselves, as well as blocking the entries to the building by chaining themselves together and to the doors. When requested to do so, Greenpeace members refused to leave the premises and indeed some individuals were removed by the police and subsequently arrested.

Preventing access to, and exit from, the premises, posed a threat to the health and safety of Shell's personnel, visitors and other third parties.

### **Shell retail sites**

This week, outside of the Netherlands, in particular in the United Kingdom, but also in Denmark, Sweden and Hungary (to date), Greenpeace members have entered Shell retail sites and engaged in the following activities:

- blocked entries or exits;
- disabled fuel pumps, by locking them using chains or bicycle locks;
- switched off the 'power switch' (also known as: 'fireman switch'), shutting off power, sometimes removing fuses or cutting wires leading to them or locking them;
- spilled fuel when tying pump hoses together;
- caused these and other safety risks to persons and goods present.

The above list is non-exhaustive. For the avoidance of doubt Shell objects to all of the above activities and any other similar activities which are unlawful and which pose a clear threat to the health and safety of Shell's customers, staff, contractors, and operations as well as the general public, your members and their would-be rescuers, together, "Unlawful Actions".

In light of the above instances, together with recent campaigns by Greenpeace members in New Zealand, Denmark and Finland by which they trespassed upon and/or impeded the movement of Shell vessels bound for the US waters offshore Alaska, and attempted to shut down a refinery in Argentina, Shell has serious and justified concerns at the manner in which such campaigns orchestrated by Greenpeace are conducted and that members of Greenpeace will on or after the date of this letter, commit further Unlawful Actions. As outlined above, this is unacceptable to Shell.

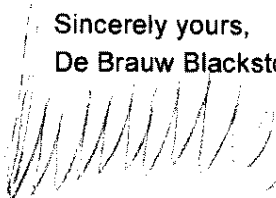
Shell has duly noted, that Greenpeace has announced an 'International Shell Day of Action' for 21 July 2012.

In view of the seriousness and unlawfulness of the actions, we must insist that you and your members desist. You are, therefore, requested to confirm to us in writing no later than Friday, 20th July 2012 at 18.00 hours that you will refrain from such Unlawful Actions at any of Shell's premises in the Netherlands and anywhere else in the world, including, but not limited to Shell's office premises, its branded retail sites, refineries and other operational premises, not only on 21 July 2012, but also going forward; and that you will cause your members to refrain from the same.

Shell will revert to the courts, if necessary, in order to obtain relief.

Shell reserves all its rights, including the right to commence proceedings against Greenpeace without further notice, should the above requested confirmation not be forthcoming by return.

Sincerely yours,  
De Brauw Blackstone Westbroek N.V.



**K. Limperg**