



Belastingdienst

Belastingdienst, Postbus 9007, 6800 DJ Arnhem

Royal Dutch Shell PLC.
Carel van Bylandtlaan 30
2596 HR 's-Gravenhage

**Centrale
Administratieve
Processen**
Woonplaatsverklaringen

Groningensingel 21
6835 EA Arnhem
Postbus 9007
6800 DJ Arnhem

woonplaatsverklaring@
belastingdienst.nl

Telefoonnummer
0800 - 0543

Datum
2 januari 2020

Kenmerk
BSN/RSIN: 8117.86.523
Volgnr: 2016260035

Behandeld door
Team Woonplaatsverklaringen

Betreft: Declaration

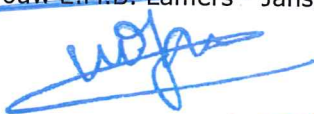
**Declaration on behalf of Royal Dutch Shell PLC. fiscal number
8117.86.523 for the year 2020**

**Regarding Directive 2011/96/EU dated 30 November 2011 on the
common system of taxation applicable in the case of parent
companies and subsidiaries of different
Member States of the Council of the European Union.**

The Inspector of the Tax authorities, Administration Office Arnhem, the
Netherlands, hereby declares that Royal Dutch Shell PLC. :

- is a company duly incorporated under UK company law as "Public Limited Company" as mentioned in Annex I, part A of article 2 of the Directive 2011/96/EU of the European Union,
- is according to Dutch tax law a resident in the Netherlands for tax purposes and, under the terms of a double taxation agreement concluded with a third State, is not considered to be resident for tax purposes outside the European Union,
- is subject to "vennootschapsbelasting" in the Netherlands as mentioned in Annex I, Part B of article 2, of the Directive 2011/96/EU of the European Union, without the possibility of an option or of being exempt.

Respectfully,
on behalf of the Inspector
Mevrouw E.M.B. Lamers - Janssen


E.M.B. Lamers-Janssen
Belastingdienst Kantoor Arnhem

Official stamp:

