



ÅRSREGNSKAPET FOR REGNSKAPSÅRET 2020 - GENERELL INFORMASJON

Enheten

Organisasjonsnummer: 878 679 172
Organisasjonsform: Aksjeselskap
Foretaksnavn: SHELL NEW ENERGIES NORWAY AS
Forretningsadresse: Tankvegen 1
4056 TANANGER

Regnskapsår

Årsregnskapets periode: 01.01.2020 - 31.12.2020

Konsern

Morselskap i konsern: Nei

Regnskapsregler

Regler for små foretak benyttet: Nei
Benyttet ved utarbeidelsen av årsregnskapet til selskapet: Forenklet IFRS

Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Severin Berget
Dato for fastsettelse av årsregnskapet: 01.07.2021

Grunnlag for avgivelse

År 2020: Årsregnskapet er elektronisk innlevert
År 2019: Tall er hentet fra elektronisk innlevert årsregnskap fra 2020

Det er ikke krav til at årsregnskapet m.v. som sendes til Regnskapsregisteret er undertegnet. Kontrollen på at dette er utført ligger hos revisor/enhetens øverste organ. Sikkerheten ivaretas ved at innsender har rolle/rettighet for innsending av årsregnskapet via Altinn, og ved at det bekreftes at årsregnskapet er fastsatt av kompetent organ.

Brønnøysundregistrene, 28.09.2021



Resultatregnskap

Beløp i: NOK	Note	2020	2019
RESULTATREGNSKAP			
Inntekter			
Sales income	4		52 859 620
Other operating income	5		20 224 535
Sum inntekter			73 084 155
Kostnader			
Other operating expenses	10	1 079 656	11 297 664
Materials, goods and services	10		44 435 441
Sum kostnader		1 079 656	55 733 105
Driftsresultat		-1 079 656	17 351 050
Finansinntekter og finanskostnader			
Renteinntekt fra foretak i samme konsern	10	188 374	717 361
Sum finansinntekter		188 374	717 361
Rentekostnad til foretak i samme konsern	10	44	1 139
Other finance expense	3	1 009 717	992 195
Sum finanskostnader		1 009 761	993 334
Netto finans		-821 387	-275 973
Ordinært resultat før skattekostnad		-1 901 043	17 075 077
Tax (expense)/credit	15	-2 387	3 738 197
Ordinært resultat etter skattekostnad		-1 898 656	13 336 880
Årsresultat		-1 898 656	13 336 880



Balanse

Beløp i: NOK	Note	2020	2019
BALANSE - EIENDELER			
Anleggsmidler			
Immaterielle eiendeler			
Intangible fixed assets	9	26 340 900	26 340 900
Sum immaterielle eiendeler		26 340 900	26 340 900
Sum anleggsmidler		26 340 900	26 340 900
Omløpsmidler			
Varer			
Fordringer			
Other short-term receivables	12	36 037 685	41 509 125
Sum fordringer		36 037 685	41 509 125
Sum omløpsmidler		36 037 685	41 509 125
SUM EIENDELER		62 378 585	67 850 025
BALANSE - EGENKAPITAL OG GJELD			
Egenkapital			
Innskutt egenkapital			
Share capital	16,17	50 000 000	50 000 000
Sum innskutt egenkapital		50 000 000	50 000 000
Opptjent egenkapital			
Retained earnings	16	11 322 849	13 221 505
Sum opptjent egenkapital		11 322 849	13 221 505
Sum egenkapital		61 322 849	63 221 505
Gjeld			
Langsiktig gjeld			
Utsatt skatt	15	9 547	11 934



Balanse

Beløp i: NOK	Note	2020	2019
Sum avsetninger for forpliktelser		9 547	11 934
Annen langsiktig gjeld			
Sum langsiktig gjeld		9 547	11 934
Kortsiktig gjeld			
Current tax	15		3 726 263
Other payables and accruals	12	1 046 189	399 344
Accounts payable	12,13		490 979
Sum kortsiktig gjeld		1 046 189	4 616 586
Sum gjeld		1 055 736	4 628 520
SUM EGENKAPITAL OG GJELD		62 378 585	67 850 025



Statsautoriserte revisorer
Ernst & Young AS

Vassbotnen 11a Forus, NO-4313 Sandnes
Postboks 8015, NO-4068 Stavanger

Foretaksregisteret: NO 976 389 387 MVA
Tlf: +47 24 00 24 00

www.ey.no
Medlemmer av Den norske revisorforening

INDEPENDENT AUDITOR'S REPORT

To the Annual Shareholders' Meeting of Shell New Energies Norway AS

Report on the audit of the financial statements

Opinion

We have audited the financial statements of Shell New Energies Norway AS, which comprise the balance sheet as at 31 December 2020, the income statement and statements of cash flows the year then ended and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the financial statements have been prepared in accordance with laws and regulations and present fairly, in all material respects, the financial position of the Company as at 31 December 2020 and its financial performance and cash flows for the year then ended in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway.

Basis for opinion

We conducted our audit in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the financial statements in Norway, and we have fulfilled our ethical responsibilities as required by law and regulations. We have also complied with our other ethical obligations in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other information

Other information consists of the information included in the Company's annual report other than the financial statements and our auditor's report thereon. The Board of Directors and Chief Executive Officer (management) are responsible for the other information. Our opinion on the audit of the financial statements does not cover the other information, and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information, and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of management for the financial statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting, unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that



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includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including International Standards on Auditing (ISAs) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with law, regulations and generally accepted auditing principles in Norway, including ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also

- ▶ identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- ▶ obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control;
- ▶ evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
- ▶ conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern;
- ▶ evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Report on other legal and regulatory requirements

Opinion on the Board of Directors' report

Based on our audit of the financial statements as described above, it is our opinion that the information presented in the Board of Directors' report concerning the financial statements and the going concern assumption is consistent with the financial statements and complies with the law and regulations.

Opinion on registration and documentation

Based on our audit of the financial statements as described above, and control procedures we have considered necessary in accordance with the International Standard on Assurance Engagements (ISAE) 3000, *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, it is our opinion that management has fulfilled its duty to ensure that the Company's accounting information is properly recorded and documented as required by law and bookkeeping standards and practices accepted in Norway.

Independent auditor's report - Shell New Energies Norway AS

A member firm of Ernst & Young Global Limited

Pennco Dokumentnøkket: XYKKT-GIZFO-N4623-E3AJG-OKAU8-EWTF3



Stavanger, 1 September 2021
ERNST & YOUNG AS

The auditor's report is signed electronically

Erik Søreng
State Authorised Public Accountant (Norway)

Penneo Dokumentnrøkket: YYYYT-GIZFO-N4623-E3AJG-OKAJ8-EWTF3

Independent auditor's report - Shell New Energies Norway AS

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"By my signature I confirm all dates and content in this document."

Erik Søreng

State Authorized Public Accountant (Norway)

On behalf of: EY

Serial number: 9578-5999-4-1529830

IP: 92.220.xxx.xxx

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Shell New Energies Norway AS

ANNUAL REPORT 2020

Organization no. 878 679 172

Annual Report 2020

for

Shell New Energies Norway AS



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Shell New Energies Norway AS

ANNUAL REPORT 2020

Organization no. 878 679 172

Annual report 2020

Business

Shell New Energies Norway AS (hereinafter referred to as “the Company”) is a wholly-owned subsidiary of A/S Norske Shell and is part of the Downstream sector.

The Company is a contracting company that owns contracts with international marine customers. The Company purchases lubricating oil products from other Shell companies and sells them on to its customers for use in marine transport, offshore operations and other marine activities. The Company also provides technical and commercial advice.

During the year 2019, as part of Shell group's business model simplification process, the Company has discontinued its marine business and has transferred the customer contracts to its another Group division, Shell Marine Products Singapore (“SMPS”) based in Singapore under the legal entity Shell Eastern Trading (Pte) Limited.

In 2019, the Company was exploring new business opportunities with new energies in the Scandinavian countries. In view of this, the Board has proposed to change the name to “Shell New Energies Norway AS” which was later approved by the shareholders formally effective from 16 January 2020.

The staff providing services to the Company are employees of the parent company. Also, personnel related administrative services are mainly received from the parent company. Technical services, marketing activities, activities such as handling customer enquiries, billings, and managing accounts receivable/payable are performed and managed centrally in the Shell Marine Business with teams spread across all their Shell offices.

No such services were provided to the Company in 2019 and 2020 as a result of discontinued operations.

Going concern

The Company has discontinued marine business during the year and continues to explore business opportunities with new energies. Hence, the Company continues to prepare the financial statements on a going concern basis.

Operations

After discontinuation of its marine operations, the Company has explored business opportunities with new energies and has funded an amount of NOK 26.3 million to a third party towards development phase of bio-fuel project.

Risks

With the discontinuation of operations, the Company has no exposure to credit risk and is exposed to a limited extent to liquidity related risks. The Company assumes a certain currency exchange risk, as it has elected not to hedge its foreign currency exposure.

Other

There are no research and development activities in the Company, but the Company has access to the Shell Group's R&D knowledge and this is used actively in the sales process.

The Company's business does not affect the external environment directly, and it experienced no personnel injuries in 2020.

The working environment, absence due to illness and equal opportunities, etc. for employees that have performed services for the Company, is described in the Annual Report of A/S Norske Shell.

There is one female Director.



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Shell New Energies Norway AS

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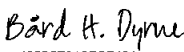
For more information, please refer to the notes to the financial statements.

Stavanger, 1 July 2021

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B. W. Melaa
Chairman of the Board of Directors

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B. Dyrnes
Director

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Kristina Anderberg Wittmeyer
Director



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Shell New Energies Norway AS

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PROFIT AND LOSS ACCOUNT FOR THE YEAR ENDED 31 DECEMBER 2020

(in NOK)

	Note	2020	2019
Discontinued operations			
OPERATING INCOME AND EXPENSES:			
OPERATING INCOME			
Sales income	4	-	52,859,620
Other operating income	5	-	20,224,535
TOTAL OPERATING INCOME		-	73,084,155
OPERATING EXPENSES			
Materials, goods and services	10	-	44,435,441
Other operating expenses	10	1,079,656	11,297,664
TOTAL OPERATING EXPENSES		1,079,656	55,733,105
OPERATING PROFIT/(LOSS)		(1,079,656)	17,351,050
FINANCE INCOME & FINANCE EXPENSES:			
FINANCE INCOME			
Interest income from group companies	10	188,374	717,361
Other finance income		-	-
TOTAL FINANCE INCOME		188,374	717,361
FINANCE EXPENSES			
Interest expense to group companies	10	44	1,139
Other finance expense	3	1,009,717	992,195
TOTAL FINANCE EXPENSES		1,009,761	993,334
NET FINANCE ITEMS		(821,387)	(275,973)
NET PROFIT/(LOSS) BEFORE TAX FROM DISCONTINUED OPERATIONS		(1,901,043)	17,075,077
Tax (expense)/credit	15	2,387	(3,738,197)
NET PROFIT/(LOSS) FROM DISCONTINUED OPERATIONS		(1,898,656)	13,336,880
TRANSFERS AND DISPOSITIONS			
Provisions for dividend		-	-
Transfer to other equity		-	-
TOTAL TRANSFERS AND DISPOSITIONS		(1,898,656)	13,336,880



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Shell New Energies Norway AS

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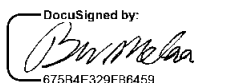
BALANCE SHEET AS AT 31 DECEMBER 2020

(in NOK)

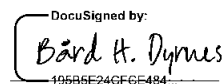
ASSETS	Note	2020	2019
Intangible fixed assets	9	26,340,900	26,340,900
CURRENT ASSETS			
Receivables			
Accounts receivables	13	-	-
Other short-term receivables	12	36,037,685	41,509,125
TOTAL CURRENT ASSETS		36,037,685	41,509,125
TOTAL ASSETS		62,378,585	67,850,025

EQUITY AND LIABILITIES	Note	2020	2019
Paid-up equity capital			
Share capital	16, 17	50,000,000	50,000,000
TOTAL PAID-UP SHAREHOLDERS' EQUITY		50,000,000	50,000,000
Retained earnings			
Retained earnings	16	11,322,849	13,221,505
TOTAL RETAINED EARNINGS		11,322,849	13,221,505
TOTAL EQUITY CAPITAL		61,322,849	63,221,505
LIABILITIES			
Provisions			
Deferred tax	15	9,547	11,934
Current liabilities			
Accounts payable	12, 13		490,979
Other payables and accruals	12	1,046,189	399,344
Current tax	15		3,726,263
TOTAL CURRENT LIABILITIES		1,046,189	4,616,586
TOTAL LIABILITIES		1,055,736	4,628,520
TOTAL EQUITY AND LIABILITIES		62,378,585	67,850,025

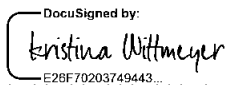
Stavanger, 1 July 2021

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B. W. Melaa
 Chairman of the Board of Directors

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B. Dyrnes
 Director

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Kristina Anderberg Wittmeyer
 Director



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CASH FLOW STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2020

(in NOK)

	2020	2019
Cash flows from operating activities		
Loss before tax from discontinued operations.	(1,901,043)	17,075,077
<u>Non-cash adjustment to reconcile profit before tax to net cash flows</u>		
Unrealized foreign exchange (gain)/loss	(55,498)	(293,130)
Interest expense	44	1,139
Interest income	(188,374)	(717,361)
Operating profit before working capital changes	(2,144,871)	16,065,725
Movements in working capital:		
(Decrease) in Account payables	(490,979)	(28,749,148)
(Decrease)/increase in Other payables and accruals	646,845	(41,924,031)
Decrease in Accounts receivables	-	32,525,742
Decrease in Other receivables	5,526,937	23,116,705
Cash generated from/(used in) operations	3,537,932	1,034,993
Direct taxes paid (net of refunds)	(3,726,262)	-
Net cash flow from/(used in) operating activities (A)	(188,330)	1,034,993
Cash flows from investing activities		
Interest received	188,374	717,361
Purchase of Intangible fixed asset	-	(26,340,900)
Net cash flow from/(used in) investing activities (B)	188,374	(25,623,539)
Cash flows from financing activities		
Movements with STCL	-	24,589,685
Interest paid	(44)	(1,139)
Net cash flow from/(used in) financing activities (C)	(44)	24,588,546
Net increase/(decrease) in cash and cash equivalents (A+B+C)	-	-
Cash and cash equivalents at the beginning of the year	-	-
Cash and cash equivalents at the end of the year	-	-



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Shell New Energies Norway AS

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Notes to the financial statements

1. Accounting principles

The annual statements were prepared in accordance with the Norwegian Accounting Act of 1998. They were prepared in accordance with Norwegian accounting rules and standards. There were no changes to the accounting principles this year.

The immediate parent Company is A/S Norske Shell.

The ultimate parent Company and controlling party is Royal Dutch Shell plc, which is incorporated in England and Wales. Royal Dutch Shell plc is the parent undertaking of the largest group to consolidate these accounts.

The consolidated accounts of Royal Dutch Shell plc are available from:

Royal Dutch Shell plc
Tel: +31 888 800 844
email: order@shell.com

Assets and Liabilities in Foreign Currency

Cash items in foreign currency are translated at the prevailing exchange rate as on the date of the balance sheet.

Intangible fixed assets

Intangible fixed assets are valued at cost less accumulated amortisation less any impairment applicable. The cost price of these assets are amortised on a straight-line basis over its estimated economic life.

Development costs are capitalized if they satisfy the technical, commercial and financial feasibility criteria set for them. Capitalised development expenses are amortised as soon as the commercial production process has commenced, with amortisation being based on the estimated economic life of the asset on a straight-line basis.

Receivables

Accounts receivables and other receivables are recorded at face value after deduction of provisions for expected losses. Provision for losses are made on the basis of an individual assessment of each claim.

Accrual of income

Income on the sale of goods is accrued at the time of delivery. Services are accrued concurrently with performance. The portion of sales revenue related to future service performance is recognized in the balance sheet as unearned income at the time of the sale and recognized thereafter as income in time with delivery.

Bank deposits

Bank deposits include cash, time deposits with bank and short-term investments with a maturity of three months or less from the time of acquisition. The bank deposit is included in a Zero-balancing Group agreement requiring that the bank account is swept into a top account, of which the Company's accumulated balance is decisive for whether there is a current receivable or payable.



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1. Accounting principles (continued)

Current tax and deferred taxes

The tax expense is related to the accounting profits and consists of the tax payable and changes in deferred taxes. The applicable tax rate for ordinary tax is used for the calculation of the tax expense.

In the balance sheet, deferred taxes are calculated on the positive temporary differences between the accounting and tax related balance sheet values after reconciliation of negative temporary differences.

A provision for deferred taxes according to the liability method without discounting has been made. Deferred tax liabilities and deferred tax assets are represented by a net amount in the balance sheet.

Cash flow statement

The cash flow statement has been prepared in accordance with the indirect method of the Norwegian Accounting Standard.

2. Discontinued operations

Following the Board's decision and as part of Shell group's business model simplification process, in the year 2019, the Company has discontinued the marine business and transferred its customer contracts to its another Group division, Shell Marine Products Singapore ("SMPS") under the legal entity Shell Eastern Trading (Pte) Limited during the year.

3. Other finance income & expense

The company's purchases and sales are accounted in USD. Thus, the profit margin is exposed to foreign currency exchange risk. Currency exchange losses and gains are recognized via the income statement as part of other finance income/expense and are as follows:

(in NOK)

	2020	2019
Other finance expense		
Net currency loss	1,006,387	969,561
Bank charges	3,330	22,634
	1,009,717	992,195
Other finance income		
Net currency gain	-	-
	-	-

4. Sales revenue

The Company's sales revenue is from the sale of international marine products and all income in 2019 is related to the sale of Marine lubrication oil.

	2020	2019
International lubricating oil	-	52,859,620
International fuel	-	-
	-	52,859,620



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5. Other operating income

The Company's other income includes commission received from Intragroup companies based on their Marine Lubrication services where the Company does not sell directly to its customers. Income from Services relates to technical services that the Company offers to its customers

(in NOK)

	2020	2019
Commission received	-	221,949
Income from services	-	858,481
Consideration received in lieu of marine business transfer	-	19,144,105
	-	20,224,535

6. Losses on accounts receivable

An amount of NOK 6,754 has been written off as bad debts against accounts receivable in the current year.

7. Remuneration to members of management

All personnel administration is governed by different Service Level Agreements between Shell New Energies Norway AS and its internal Group service providers. Shell New Energies Norway AS itself has no employees but procures all types of services from other Shell companies. The total amount recognized for these services amounted to NOK Nil in 2020 (2019: NOK Nil).

The fee recognized for mandatory audit services amounts to NOK 69,007 excluding VAT (2019: NOK 79,241 excluding VAT). No compensation has been paid to the Directors.

8. Number of employees

The company has no employees. Administrative services are mainly purchased from A/S Norske Shell, which also ensures compliance with the requirements related to mandatory company pension.

9. Intangible fixed assets

The contribution made to the third party of NOK 26.3 million towards development phase of bio-fuel project was treated as a development cost and hence capitalised as an intangible fixed asset as the management and the business is of the view that it is probable that the future economic benefits attributable to the asset will flow to the entity.



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Shell New Energies Norway AS

ANNUAL REPORT 2020

Organization no. 878 679 172

10. Transactions with related parties and others

(in NOK)

	2020	2019
Other operating income		
Other group companies	-	(221,949)
Others	-	(858,481)
Total income	-	(1,080,430)
Operating expenses		
Shell Eastern Trading (PTE) Limited	-	14,760,905
Shell Nederland Verkoopmaatschappij B.V.	-	-
Shell Markets (Middle East) Limited	-	2,443,446
Shell Deutschland Oil GmbH	-	3,584,401
Hankook Shell Oil Co Ltd	-	1,266,575
Other group companies	-	6,559,654
Others	-	15,820,460
Purchases	-	44,435,441
Shell International Petroleum Company Limited	918,831	9,523,747
Other group companies		98,205
Shell India Markets Private Limited	6,754	
Shell Polska Sp. Z O.O. Oddzial		
Others	154,071	1,675,711
Other costs	1,079,656	11,297,663
Total operating expenses	1,079,656	55,733,104
Finance (income)/expenses from group companies		
Shell Treasury Centre Limited	(188,374)	(717,361)
Finance income from group companies	(188,374)	(717,361)
Shell Treasury Centre Limited	44	1,139
Finance expense from group companies	44	1,139
Net finance (income)/expense from group companies	(188,330)	(716,222)

The input for the table is based on incoming and outgoing invoices and accruals recorded in 2020 and 2019 comparatives.

11. Bank deposits and other cash equivalents (Zero-Balancing)

The bank accounts of the Company are part of a Group account system called Zero-Balancing. This means that accounts are swept daily into a top-level account in which accumulated receivables or payables are reported as claims or liabilities against Shell Treasury Company Limited (STCL). As of 31 December 2020, the Company's outstanding balance from STCL amounted to NOK 35,270,449 and is part of the claim on inter-group companies (Please refer to Note 12 below). There are no joint and several liabilities for the Group account arrangement.



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12. Accounts between companies in the same corporate group

(in NOK)

	2020	2019
Other short-term receivables		
- Related parties	36,037,681	41,210,571
- Others	4	298,554
	36,037,685	41,509,125
Account payables		
- Related parties	-	454,857
- Others	-	36,122
	-	490,979
Other payables and accruals		
- Related parties	900,195	232,299
- Others	145,994	167,045
	1,046,189	399,344

Other short-term receivables from related parties includes outstanding balances in Zero-Balancing.

13. Receivables / payables

The Company has classified all the receivables as current assets. The investment receivables included in the other receivables are related to customer contracts in which the Company offers discounted arrangements related to the first filling of lubricating oil for new vessels (initial fill - IF) or the refilling of lubricating oils related to new contracts where the customer previously has had an agreement with another oil company (changeover - CO). The negative margin on these sales are moved from the income statement to the balance sheet. From thereon, the amount is amortized monthly in line with the contract period.

14. Accounting currency

The Company records its transactions in USD, but the reporting currency is NOK. All exchange rate differences are recognized in the income statement as other finance income or other finance expense. The conversion rate to NOK in the income statement is based on an average monthly rate, whereas the conversion rate in the balance sheet is the exchange rate as on 31 December 2020. The exchange rates used for conversion are from Norges Bank.



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15. Taxes

(in NOK)		
Basis for current year's tax payable:	2020	2019
Net (loss)/profit before tax from discontinued operations	(1,901,043)	17,075,077
Permanent differences	32,169	-
Basis for current year's tax	(1,868,874)	17,075,077
Change in temporary differences	10,849	13,561
Basis for tax credit/payable in the profit and loss account	(1,858,025)	17,088,638
Group relief paid		(151,082)
Taxable income prior to group contribution	(1,858,025)	16,937,556
Tax expense in current year consists of:		
Current tax on result of the period (2020: 22%; 2019: 22%)	-	3,726,263
Current tax on result of previous periods	-	-
Change in deferred tax	(2,387)	11,934
Total tax (credit)/expenses	(2,387)	3,738,197
Tax payable in the balance sheet:		
Tax payable on current year's result	-	3,738,197
Tax on group relief received	-	-
Tax payable	-	3,738,197

Specification of basis for deferred tax	Change	2020	2019
Current assets	-	-	-
Profit and loss account	10,849	43,397	54,246
Carry forward loss	(1,858,025)	1,858,025	-
Basis for deferred tax in the balance sheet	10,849	43,397	54,246
Deferred tax (asset)/liability in the balance sheet	2,387	9,547	11,934

The company chose not to account the deferred tax asset on the carried forward loss of 1.85 million

16. Equity

(in NOK)			
	Share Capital	Retained earnings	Total equity
Equity as at 01.01.2020	50,000,000	13,221,505	63,221,505
Current year's change in equity			
Result of the year from discontinued operations	-	(1,898,656)	(1,898,656)
Equity as at 31.12.2020	50,000,000	11,322,849	61,322,849



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17. Share capital and shareholder information

The company's share capital is NOK 50,000,000, comprises 5,000 shares with a face value of NOK 10,000 per share. A/S Norske Shell is the sole shareholder.

18. Subsequent events

There are no subsequent events with a significant impact on the annual accounts.



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Ernst & Young

Att.: Erik Sjøreng

This letter of representations is provided in connection with your audit of the financial statements of *Shell New Energies Norway AS* ("the Company") for the year ended December 31, 2020. We recognize that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion as to whether the financial statements give a true and fair view of (or 'present fairly, in all material respects,') the financial position of *Shell New Energies Norway AS* as of *December 31, 2020* and of its financial performance (or operations) and its cash flows for the year then ended in accordance with *Norwegian accounting rules and standards*.

We understand that the purpose of your audit of our (consolidated) financial statements is to express an opinion thereon and that your audit was conducted in accordance with International Standards on Auditing, which involves an examination of the accounting system, internal control and related data to the extent you considered necessary in the circumstances, and is not designed to identify - nor necessarily be expected to disclose - all fraud, shortages, errors and other irregularities, should any exist.

Accordingly, we make the following representations, which are true to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

A. Financial Statements and Financial Records (See note B.)

1. We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated *May 20, 2016*, for the preparation of the financial statements in accordance with *Norwegian accounting rules and standards*.
2. We acknowledge, as members of management of the Company, our responsibility for the fair presentation of the financial statements. We believe the financial statements referred to above give a true and fair view of (or 'present fairly, in all material respects') the financial position, financial performance (or results of operations) and cash flows of the Company in accordance with *Norwegian accounting rules and standards*, and are free of material misstatements, including omissions. We have approved the financial statements.
3. The significant accounting policies adopted in the preparation of the financial statements are appropriately described in the financial statements.
4. As members of management of the Company, we believe that the Company has a system of internal controls adequate to enable the preparation of accurate financial statements in accordance with *Norwegian accounting rules and standards* that are free from material misstatement, whether due to fraud or error.

There are no unadjusted audit differences identified during the current audit and pertaining to the latest period presented.



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B. Non-compliance with laws and regulations, including fraud

1. We acknowledge that we are responsible to determine that the Company's business activities are conducted in accordance with laws and regulations and that we are responsible to identify and address any non-compliance with applicable laws or regulations, including fraud.
2. We acknowledge that we are responsible for the design, implementation and maintenance of internal controls to prevent and detect fraud.
3. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
4. We have disclosed to you, and provided you full access to information and any internal investigations relating to, all instances of identified or suspected non-compliance with laws and regulations including fraud known to us that may have affected the Company (regardless of the source or form and including, without limitation, allegations by "whistle-blowers"), including non-compliance matters:
 - Involving financial improprieties
 - Related to laws and regulations that have a direct effect on the determination of material amounts and disclosures in the Company's financial statements
 - Related to laws and regulations that have an indirect effect on amounts and disclosures in the financial statements, but compliance with which may be fundamental to the operations of the Company's business, its ability to continue in business, or to avoid material penalties
 - Involving management, or employees who have significant roles in internal control, or others
 - In relation to any allegations of fraud, suspected fraud or other non-compliance with laws and regulations communicated by employees, former employees, analysts, regulators or others

C. Information Provided and Completeness of Information and Transactions

1. We have provided you with:
 - Access to all information of which we are aware that is relevant to the preparation of the financial statements such as records, documentation and other matters
 - Additional information that you have requested from us for the purpose of the audit and
 - Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.
2. All material transactions have been recorded in the accounting records and are reflected in the financial statements.



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3. We have made available to you all minutes of the meetings of shareholders, directors and committees of directors (or summaries of actions of recent meetings for which minutes have not yet been prepared) held through *January 1, 2020 to December 31, 2020* to the date of this letter.
4. We confirm the completeness of information provided regarding the identification of related parties. We have disclosed to you the identity of the Company's related parties and all related party relationships and transactions of which we are aware, including sales, purchases, loans, transfers of assets, liabilities and services, leasing arrangements, guarantees, non-monetary transactions and transactions for no consideration for the period ended, as well as related balances due to or from such parties at the December 31, 2020 end. These transactions have been appropriately accounted for and disclosed in the financial statements.
5. We have disclosed to you, and the Company has complied with, all aspects of contractual agreements that could have a material effect on the (consolidated) financial statements in the event of non-compliance, including all covenants, conditions or other requirements of all outstanding debt.
6. We have disclosed to you any cybersecurity breach that either occurred or that third parties (including regulatory agencies, law enforcement agencies and security consultants) had brought to our attention during the period under audit and up to the date of the representation that could potentially be material to the financial statements.

D. Assets

1. Company has satisfactory title to all assets appearing in the balance sheet, and there are no liens or encumbrances on the Company's assets, nor has any asset been pledged as collateral.
2. All assets, including intangible assets, are correctly reflected in the financial statement.

E. Liabilities and Contingencies

1. All liabilities and contingencies, including those associated with guarantees, whether written or oral, have been disclosed to you and are appropriately reflected in the financial statements.
2. We have informed you of all outstanding and possible litigation and claims, whether or not they have been discussed with legal counsel.
3. We have recorded and/or disclosed, as appropriate, all liabilities related litigation and claims, both actual and contingent, and have disclosed in the financial statements all guarantees that we have given to third parties.
4. No other claims in connection with litigation have been or are expected to be received.

F. Subsequent Events

1. We confirm that we have provided you with information about effects of Covid-19, and that these effects have been adequately considered and presented in the Financial Statements.



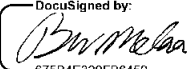
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G. Other information

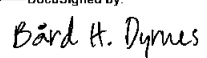
1. We acknowledge our responsibility for the preparation of the other information.
2. We confirm that the content contained within the other information is consistent with the financial statements.

Stavanger, 21.06.2021

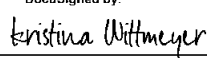
Shell New Energies Norway AS

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B. W. Melaa
Chairman

DocuSigned by:

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B. Dyrnes
Director

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Kristina Anderberg Wittmeyer
Director



Skattedirektoratet

Saksbehandler Rune Tystad	Deres dato 31.01.2017	Vår dato 13.02.2017
Telefon 977 59 464	Deres referanse Håvard Zeiler-Sørensen	Vår referanse 2017/96981

A/S Norske Shell
Postboks 40
4098 TANANGER

Tillatelse til å utarbeide årsregnskap og årsberetning på engelsk språk for Shell Marine Products AS, org.nr. 878 679 172

Vi viser til deres brev mottatt 31. januar 2017 der dere søker om dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk språk for Shell Marine Products AS.

Skattedirektoratet gir på bakgrunn av en konkret helhetsvurdering Shell Marine Products AS dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk språk, jf. regnskapsloven § 3-4 tredje ledd. Dispensasjonen forutsetter at opplysningene som vedtaket baserer seg på ikke endres vesentlig.

Kopi av dette brevet må sendes Regnskapsregisteret i Brønnøysund sammen med årsregnskapet. Det påligger den regnskapspliktige å dokumentere ved dette brev at tillatelsen er gitt.

Bakgrunn

Fra deres søknad gjengis:

Shell Marine Products(org nr. 878 679 172) er et kontraktsselskap som eier kontrakter med internasjonale marine kunder. Selskapet kjøper smøreoljeprodukter fra andre Shell-selskaper og selger disse videre til sine kunder. Det er ingen ansatte i selskapet, da de kjøper tjenester fra morselskap A/S Norske Shell og Danske Shell. Selskapet er et heleid datterselskap av AS Norske Shell som igjen er heleid av selskap i utlandet.

Engelsk er det klart dominerende språket i bransjen og konsernets arbeidsspråk er engelsk. Styret består av personer som har engelsk som primært arbeidsspråk. Regnskapet utarbeides følgelig på engelsk da dette er det språket som er nødvendig for å kommunisere med konsernselskap og styret. Det er ingen forhold rundt selskapets finansiering som skulle tilsi behov for regnskap på norsk, da selskapet ikke har noe ekstern gjeld. Etter vår vurdering er det ingen mulige brukere av årsregnskapet som blir negativt påvirket av at regnskapet kun utarbeides på engelsk, da alle aktører i bransjen antas å ha god kjennskap til det engelske språket.

Skattedirektoratets vurdering

Etter regnskapsloven § 3-4 tredje ledd skal "årsregnskapet og årsberetningen ... være på norsk. Departementet kan ved ... enkeltvedtak bestemme at årsregnskapet og/eller årsberetningen kan

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være på et annet språk.”

I Ot. prp. nr. 42 (1997-1998) Om lov om årsregnskap m.v., er det uttalt følgende om regnskapslovens formål, jf. pkt. 1.1:

”Regjeringen har som siktemål at regnskapsloven skal bidra til informative regnskaper for ulike grupper av regnskapsbrukere. Regnskapsbrukerne er dels investorer og kreditorer som tilfører kapital til foretakene, og dels andre grupper som har interesse av å vite hvordan foretaket drives, f.eks. de ansatte og lokalsamfunnet. Informasjonen til kapitalmarkedet skal gi grunnlag for riktig prising av finansielle objekter. Riktig prisdannelse på aksjer er en forutsetning for at ressursbruken i samfunnsøkonomien skal bli best mulig. Gode regnskaper vil også gjøre det vanskeligere for markedsdeltakere å ta ut spekulasjonsgevinster med basis i skjevt fordelt informasjon.”

Det fremgår således at et av hovedformålene med regnskapsloven er å bidra til “*informative regnskaper for ulike grupper av regnskapsbrukere*”. Regnskapsbrukere vil omfatte, jf. uttalelsen i proposisjonen, blant andre investorer, kreditorer, ansatte og lokalsamfunnet.

Det er etter Skattedirektoratets vurdering derfor avgjørende ved vurdering av om dispensasjon fra kravet til å utarbeide årsregnskap og/eller årsberetning på norsk kan gis, at det ikke foreligger mulige brukere av regnskapsinformasjon som blir vesentlig berørt negativt ved en eventuell dispensasjon.

Det er særlig hensynet til brukerne av regnskapsinformasjon som skal vurderes ved en dispensasjonssøknad. I denne vurderingen har Skattedirektoratet lagt vekt på at selskapet er et heleid datteselskap og at eierkretsen derfor er begrenset. Videre er det vektlagt at selskapet opererer innen en internasjonal bransje og at det antas at ingen mulige brukere av årsregnskapet blir negativt påvirket av at regnskapet kun utarbeides på engelsk.

Vennligst oppgi vår referanse ved henvendelser i saken.

Med hilsen

Torstein Kinden Helleland
seniorrådgiver
Rettsavdelingen, foretaksskatt
Skattedirektoratet

Rune Tystad

Dokumentet er elektronisk godkjent og har derfor ikke håndskrevne signaturer