

GROSS & CO.
S O L I C I T O R S

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Your ref

Our ref

JCC/GP/KIR001/8

24th April 1995

J. Donovan Esq
Don Marketing (UK) Ltd
St Andrews Castle
33 St Andrews Street South
Bury St Edmunds
Suffolk

Dear Mr Donovan,

I now enclose the completed Affidavit (with exhibit) for your records. I also enclose my account.

If I can be of any assistance in the future, then please let me know.

With kind regards.

Yours sincerely

J. C. Cobbold

Enc

AFFIDAVIT OF JONATHAN CHARLES COBBOLD

I JONATHAN CHARLES COBBOLD Solicitor a partner in Messrs Gross & Co Solicitors of 84 Guildhall Street, Bury St. Edmunds, Suffolk
MAKE OATH and say as follows:-

1. On 13th April 1995 I attended a meeting at my above offices, to act as an independent observer in connection with the opening of replies to a Shell Retailer Survey undertaken by the Shell Corporate Conscience Pressure Group.
2. Those present when the envelopes were opened and the results collated were myself and John Alfred Donovan ("Mr. Donovan"), of the Shell Corporate Conscience Pressure Group.
3. Prior to 13th April 1995, my firm had not acted for Mr. Donovan in his personal capacity. In addition, I had never met Mr. Donovan prior to the 13th April 1995. My firm had on the 23rd March 1995 previously acted as an independant observer in a similar transaction for the Shell Corporate Conscience Pressure Group.
4. The envelopes I was to observe opening contained completed response forms in the same form as that now produced to me and marked "JCC1". The envelopes were all opened in front of me and were stapled to the respective response form. These were then handed to me for verification.
5. I confirmed that each response had been completed correctly and checked the postmark on the envelope against the address of the particular respondent; there were only six postmarks that I was unable to read.
6. Following such verification I placed each form in three

corresponding piles according to the box that had been ticked by the respondent, making a note of whether the response was yes or no.

7. The forms were all counted by me.
8. On 20th April 1995 Mr. Donovan attended at my firm's offices at 84 Guildhall Street, Bury St. Edmunds, Suffolk with a further four envelopes.
9. These further envelopes were opened and checked in the same manner as before.
10. The total number of responses was 102, of which 14 were incorrectly completed and were judged by myself as "spoils". Of the remaining replies, the responses were as follows:-

first question 10 - yes, 77 - no

second question 80 - yes, 8 - no

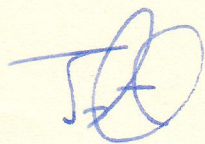

third question 77 - yes, 10 - no.

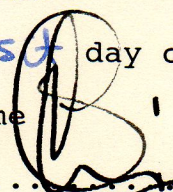
SWORN by the above named deponent
at 84, GUILDHALL STREET
Bury St. Edmunds in the County
of Suffolk

this 25th day of APRIL 1995

before me

.....
Solicitor/Commissioner for Oaths

 [G.B. Golez]
Solicitor/Commissioner for Oaths

SWORN 25th DAY OF April 1995

Exhibit "JCC1" as referred to in an Affidavit sworn by Jonathan Charles Cobbold the 25th day of April 1995.

Produced before me

..... [G.H. Brown]
Solicitor/Commissioner for Oaths

SHELL RETAILER SURVEY

We are conducting a further survey, this time by writing to over 1,400 Shell stations. Please answer each question by ticking the corresponding "Yes" or "No" box, as you deem appropriate.

YES NO

☐☐

Would you recommend any petrol retailer considering a brand change, to switch to Shell?

☐☐

Do you support our call for Shell to offer small businesses trading with them the option of referring disputes to independent binding arbitration.

☐☐

Given the recent SCCPG survey results, should Shell's discredited management resign and a fairer, more considerate policy to Shell retailers be introduced?

Please complete the name and address panel below and then fold and return this whole form in the FREEPOST envelope provided. Your name and address details will be treated in the strictest confidence. The results, in percentage terms for each option, will be announced in the Forecourt Trade Press.

**SHELL CORPORATE
CONSCIENCE
PRESSURE GROUP**
St Andrews Castle,
33, St Andrews Street South
Bury St Edmunds Suffolk.
IP33 3PH

YourName:.....
Station Name:.....
Address
.....
.....Post Code:.....
Tel:.....

SHELL CORPORATE CONSCIENCE PRESSURE GROUP

AIMS & OBJECTIVES

The main objective of the pressure group is to persuade Shell UK Ltd to offer companies trading with them the option of referring disputes to an independent binding Arbitration Service. The group may from time to time at the founders discretion, assist members who are in dispute with Shell UK Ltd.

FURTHER INFORMATION

All members will be updated on developments on a quarterly basis. Shell retailers in most areas of the UK, plus suppliers of goods and services to Shell, and Shell shareholders, are already members of the pressure group. New members should contact us if they are currently in dispute with Shell as we may be able to help.

MEMBERSHIP TERMS

I agree to accept free membership only on the basis that I will not be associated with any action undertaken by the pressure group other than actions designed to promote the said "Aims & Objectives" on a legal and proper basis. It is also on the understanding that I will not be required to make any financial contribution whatsoever.

Tick One
Box Only

CONFIDENTIALITY

☐

I have no objection to my membership in the pressure group being made public knowledge.

☐

I do not, under any circumstances, wish my membership to be made public or disclosed to Shell.

Your Signature:.....Date:.....

(PLEASE COMPLETE DETAILS BELOW IN BLOCK CAPS)

Your Own Name :.....

Your Business Name:.....

Address:.....

.....Post Code.....

Tel No:.....



WITH COMPLIMENTS FROM PEBLEY BEACH

1-3 Moormead Road, Wroughton, Swindon, Wilts. SN4 9BS

Tel: (0793) 812235 Fax: (0793) 814990



SUZUKI



Retail Motor
Industry
Federation

PLEASE SEND ME DETAILS OF THE SHELL
CORPORATE CONSCIENCE PRESSURE GROUP. AS A LICENCEE
WHO HAS JUST LOST ONE SITE (REMOVING WAY SERVICES) TO
CITY AND AS LICENCEE OF MARLBOROUGH SWINDON WHICH
IS SCHEDULED TO GO TO CITY LATER THIS YEAR. I AM
NOT AT ALL HAPPY WITH SHELL. I BELIEVE THE CURRENT
REGIME IS TOTALLY IMMORAL. REGARDS

Reg. in England No. 1288208

Directors: R. C. Threlfall V. B. Threlfall

VAT No. 196 0287 41

J. SIMPSON & SONS LTD.

Park Road, Glasshoughton
Castleford, West Yorkshire
Telephone: Castleford 511601



FAO Mr A. Donovan.
07/04/95.

Dear Sir,

Having recieved the letter from your pressure group today and after my telephone conversation with one of your associates I felt I must write to add our own concerns to that of others you have obviously recieved recently.

We as a company have sold shell petrol at this location for sixty years. The last fifteen of which we acted as both landlord and tennant in respect of our forecourt retailing operation. And up untill the last five years have had an extremely good and cordial relationship with SHELL UK. However the last five years have seen a drastic change in this relationship. With SHELL UKs apparent policy change from an aggressive pricing structure within its retailing operation to one of a non aggressive stance and since this inception its savage attitude towards its own retailing network.

It would appear to ourselves that since many of SHELL UKs own staff have left the company (staff I would suggest of long and experianced standing) they appear to have been replaced by what I can only call college boys who would appear to be operating on the text book mentality of business operation to the cost of all else.

With the above in mind as our contract with SHELL UK expired in july of 1994 we were faced with the choice of running our forecourt ourselves as independants or to lease our site and have no more involvement in its daily operations, as we did not want to remove shell petrol from our site we chose to lease the site to shell for a further 15yrs but even this was not straight forward. The fickle nature and lack of honour within our negotiations were a shock to our selves coming from a large company as Shell obviously is. But in retrospect we are now not suprised.

we would hope this letter may help you and serve as a warning to others contemplating any form of activity with this company.

yours faithfully.

I. N. Ainsley.