

**Keith Garwood**  
**Third Witness Statement**  
**Party: Claimant**  
**Exhibit: KG3**  
**Date: 30 March 2023**  
**Claim No: QB-2022-001259**

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**  
**BETWEEN**

**SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED**

**Claimant**

**- and -**

**PERSONS UNKNOWN ENTERING OR REMAINING IN OR ON THE BUILDING KNOWN AS SHELL CENTRE TOWER, BELVEDERE ROAD, LONDON ("SHELL CENTRE TOWER") WITHOUT THE CONSENT OF THE CLAIMANT, OR DAMAGING THE BUILDING OR DAMAGING OR BLOCKING THE ENTRANCES TO THE SAID BUILDING**

**Defendants**

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**Third Witness Statement of Keith Garwood**

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I, **Keith Garwood** of Shell Centre, London SE1 7NA **WILL SAY AS FOLLOWS:**

**1. INTRODUCTION**

- 1.1 I am an Asset Protection Manager employed by Shell International Limited ("**SIL**"), which is a company within the Shell group of companies providing services to Shell International Petroleum Company Limited ("**SIPC**") who is the Claimant in these proceedings.
- 1.2 Unless I state otherwise, the facts in this statement are within my knowledge and true. Where the facts are not within my knowledge, they are true to the best of my knowledge and belief, and I identify the source of my knowledge.
- 1.3 References to page numbers in this statement are to page numbers in **Exhibit KG3**.

- 1.4 These proceedings are injunction proceedings which concern the building known as the Shell Centre Tower on Belvedere Road in London ("**Shell Centre Tower**").
- 1.5 I make this witness statement in support of SIPC's application for the continuation of the injunctive relief granted by order dated 3 May 2022 ("**the Shell Centre Tower Injunction Order**") beyond 2 May 2023.
- 1.6 In these proceedings, I have previously given:
- 1.6.1 a witness statement dated 14 April 2022 ("**My First Witness Statement**"); and
- 1.6.2 a witness statement dated 22 April 2022 ("**My Second Witness Statement**");
- 1.7 This witness statement is made in conjunction with Christopher Gamble's witness statement dated ("**Christopher Gamble's First Witness Statement**") – which is made:
- 1.7.1 also in support of SIPC's abovementioned application in these proceedings; and
- 1.7.2 in support of separate applications made in related injunction proceedings involving other members of the wider Shell group of companies in respect of Shell Haven Oil Refinery, the Manorway, Stanford Le-Hope ("**Shell Haven**") and Shell-branded filling stations across England and Wales ("**Shell Petrol Stations**").
- 1.8 I would like to make clear from the outset that SIPC does not seek to prevent protestors from undertaking peaceful lawful protests whether any such protests arise near to the Shell Centre Tower or otherwise.
- 1.9 However, for the reasons explained in this statement and Christopher Gamble's First Witness Statement, there is considered to be a very real and continuing threat to health and safety and wellbeing to SIPC's employees, contractors and visitors (and to the Defendants themselves).
- 1.10 Therefore, SIPC has made its application to seek the continuation of the injunction granted in an attempt to prevent potentially unlawful actions and activities.

## 2. **THE SHELL CENTRE TOWER**

2.1 As is more fully explained in My First Witness Statement and My Second Witness Statement:

2.1.1 Shell Centre Tower is the global headquarters of the wider Shell group of companies, set in an iconic and prominent location on the South Bank of the River Thames and forming the backdrop to the London Eye.

2.1.2 The Shell Centre Tower forms part of Shell Centre and fronts onto Belvedere Road and then onto Jubilee Gardens and is made up of 25 office floors and a further two levels underground.

2.1.3 There remains around 5,000 employees of the wider Shell group of companies registered to the Shell Centre Tower (though the capacity at Shell Centre Tower remains around 3,000). Generally speaking, the level of staff, contractors and visitors at Shell Centre Tower is around 2,200.

### 3. **BACKGROUND TO THE SHELL CENTRE TOWER INJUNCTION ORDER**

3.1 As is more fully explained in My First Witness Statement, My Second Witness Statement, and Christopher Gamble's First Witness Statement:

3.1.1 As well as other businesses operating within the oil and gas industry, the wider Shell group of companies became the subject of an increasing number of protests last year which went well beyond peaceful protest.

3.1.2 A summary of the wider incidents experienced by the wider Shell group of companies and their businesses in the lead up to the grant of the injunction order in respect of Shell Centre Tower (**"the Shell Centre Tower Injunction Order"**) is provided in Christopher Gamble's First Witness Statement.

3.1.3 In relation to the Shell Centre Tower specifically and the events leading up to the grant of the Shell Centre Tower Injunction Order, members of Extinction Rebellion targeted the Shell Centre Tower on 15 April 2019 and caused significant damage to Shell Centre Tower. As well as protestors painting symbols and physically gluing themselves to the revolving doors affronting Shell Centre Tower, one of the protestors smashed one of the glass panes and was very fortunate not to have injured herself or others in the process.

- 3.1.4 Worryingly, on the same occasion, two further protestors climbed onto the canopy (which is not designed to be load-bearing) which overhangs the revolving doors. The health and safety risks to the Defendants and others is obvious and I consider it extremely lucky that no one was seriously hurt on this occasion.
- 3.1.5 On 13 April 2022 a further incident occurred where eight protestors, disguised in business attire, managed to evade security and make their way actually inside Shell Centre Tower.
- 3.1.6 Aside from gluing themselves to different parts of the reception area, one of the protestors managed to make his way up to the fourth floor of the Shell Centre Tower where he then proceeded to take pictures of employees and videos of himself which he then posted on Twitter. The protestor was not physically violent towards employees and security staff and did not cause damage to property but employees were understandably distressed by the incident and concerned by the lengths some protestors are willing to go to in order to evade security and enter their place of work within Shell Centre Tower.
- 3.1.7 On 15 April 2022, around 30 protestors which are believed to be associated with Extinction Rebellion held banners and other signs outside of the Shell Centre Tower before moving to obstruct Belvedere Road entirely, causing a significant health and safety risk by restricting access for emergency vehicles.
- 3.1.8 On 20 April 2022, protestors ignited flares outside of Shell Centre Tower and then moved to the rear access area to Shell Centre Tower to set up directly outside the doors. My primary concern with such activity is if a fire alarm were to be activated or emergency services are required to attend the offices within Shell Centre Tower. In such circumstances, delays could be caused by the protestor's activity and the blocking of entrances and exists. This could, in turn, lead to very serious (and potentially life-threatening) situations if, for example, employees or visitors in Shell Centre Tower required urgent medical attention.

#### **4. TARGETING OF SHELL CENTRE TOWER SINCE THE SHELL CENTRE TOWER INJUNCTION ORDER**

- 4.1 I am pleased to say that, on the whole, the injunction has proved effective as a deterrent and that the number of serious incidents at Shell Centre Tower has reduced as a result. As I have already said, SIPC has no interest in preventing lawful and peaceful protests and indeed a number of peaceful protests have taken place in the vicinity of Shell Centre Tower (on land owned by SIPC) since the Shell Centre Tower Injunction Order was granted.
- 4.2 Whilst that is encouraging, Shell Centre Tower continues to be in a prime location for protestors to enable them to achieve the "headline grabbing" status desired. As such, corporate buildings such as and including Shell Centre Tower continue to be a target for protestor action, and there remains a concern that individual protestors would be inclined to engage in unlawful actions and activities upon expiry of the Shell Centre Tower Injunction Order if it were not renewed, in furtherance of the publicity they are seeking for their campaign.
- 4.3 Since the grant of the Shell Centre Tower Injunction Order, I am aware of at least 22 protests taking place in the vicinity of Shell Centre Tower, and most recently on 24 March 2023.
- 4.4 I am also aware of other corporate buildings being targeted by the same or similar groups. For example, I am aware of Just Stop Oil specifically targeting prominent buildings and venues across London, as shown in the following video posted by Just Stop Oil: <https://www.youtube.com/watch?v=ubdLEY96Y18> and which is also found at page 20 of **Exhibit KG3**.
- 4.5 Similarly, I am aware from various new articles that other high-profile buildings have been targeted by Just Stop Oil such as the Rolex shop in Knightsbridge - [Just Stop Oil spray paint Knightsbridge Rolex shop in latest protest | Evening Standard](#) and various car-dealerships of Ferrari, Bugatti and Bentley - [Just Stop Oil protesters spray paint over Bentley, Ferrari and Bugatti showrooms in London | UK News | Sky News](#). Copies of these articles are also found pages 23 to 33 of **Exhibit KG3**.
- 4.6 I am also aware from news reports that Barclays' HQ and other corporate buildings occupied by Barclays (seemingly targeted due to Barclays' contribution to the fossil fuel industry) have been an attractive target for protestors. See further [Extinction Rebellion activists stage protest outside Barclays in Glasgow \(msn.com\)](#) which is also found at page 52 to 53 of **Exhibit KG3**.

- 4.7 Notably, members from Extinction Rebellion also chained themselves inside a Barclays branch in Guildford as an act of “solidarity for the seven brave women who were sentenced yesterday for breaking the glass at Barclays Headquarters to raise the alarm for the climate emergency and their complicity in the destruction of the natural world”. See further: [Guildford Barclays XR protesters dressed as Suffragettes chain themselves together - Surrey Live \(getsurrey.co.uk\)](#) which is also found at page 59 to 68 of **Exhibit KG3**.
- 4.8 Similarly, I am aware that Just Stop Oil protestors also targeted the Silver Fin building in Aberdeen (which is officed by both Barclays and Shell): [Just Stop Oil throw orange paint over offices of Barclays and Shell | News | Independent TV](#) and [Just Stop Oil supporters cover Barclays Aberdeen in paint – Just Stop Oil](#). Copies of these articles are also found at pages 38 to 41 of **Exhibit KG3** respectively.
- 4.9 SIPC’s solicitors have prepared a chronology setting these out (a copy of which is exhibited at pages 6 to 98 of **Exhibit KG3**). These include those set out below which were reported in the press or reported to me by members of SIPC’s security staff.

#### 8 May 2022

- 4.9.1 On the afternoon of 8 May 2022, around 70-80 protestors associated with Extinction Rebellion arrived outside Shell Centre Tower. The lead protestor confirmed that the protest would be peaceful and that the protest would move towards Downing St. Protestors used chalk to mark the building and then at around 15.25, the protestors dispersed before heading towards Westminster Bridge. Photographs are exhibited at 6 to 7 of **Exhibit KG3**.

#### 26 July 2022

- 4.9.2 On the evening of 26 July 2022 at around 18.32, around 20 protestors started to arrive in front of Jubilee Gardens opposite Shell Centre Tower. The protestors played instruments and handed out leaflets referencing “Stop Jackdaw Five”. Five protestors did make their way to the rear of Shell Centre Tower but stopped outside to take photographs and were then escorted back to Belvedere Road by security. At 19.30, the protestors packed up and left. Photographs are exhibited at 8 to 9 of **Exhibit KG3**.

#### 28 July 2022

- 4.9.3 At around 13.36 on 28 July 2022, 13 protestors arrived at Jubilee Garden and headed towards Shell Centre Tower, eventually taking up position at the rear of Shell Centre Tower and outside of a coffee shop nearby. Police were in attendance and at 13.56 the protestors left the area. Photographs are exhibited at 10 to 11 of **Exhibit KG3**.

#### 22 August 2022

- 4.9.4 On 22 August 2022, a small number of Extinction Rebellion activists began playing drums in Jubilee Gardens. Shortly afterwards, more protestors joined reaching about 20 in number. A banner was held up which read "*SHELL NOT WELCOME, REMEMBER THE OGONI 9. KEEP THE FOSSIL FUEL IN THE GROUND*". At 20.30, the protest finished and members left. Photographs are exhibited at 12 to 14 of **Exhibit KG3**.

#### 26 August 2022

- 4.9.5 On 26 August 2022 at 17.27, a small group gathered in Jubilee Gardens with the crowd then lying down in front of Shell Centre Tower. At 19.15, the protest finished and left the area. Photographs are exhibited at 15 to 17 of **Exhibit KG3**.

#### 27 September 2022

- 4.9.6 At around 11.44 on 27 September 2022, around 50-60 protestors from Christian Action Group for Loss and Damage Action Day against Fossil Fuels arrived at Jubilee Gardens. Protestors held a vigil and left shortly afterwards at 12.10 and headed towards Parliament Square. Photographs are exhibited at 18 to 19 of **Exhibit KG3**.

#### 15 October 2022

- 4.9.7 At 11.45 on 15 October 2022, an initial 6 protestors from Extinction Rebellion arrived at Jubilee Gardens on bikes. The numbers began to slowly build and at around 12.30 reached approximately 30 in number. After walking around the area of Shell Centre Tower, protestors began to disburse and eventually left at 13.10. Photographs are exhibited at 21 to 22 of **Exhibit KG3**.

#### 10 November 2022

- 4.9.8 On 10 November 2022 a small (estimated between 30 and 40 individuals) demonstration took place outside of Shell Centre Tower. At 15.18 the Security Control Room were informed of protesters walking alongside the river towards the area around Shell Centre and external officers were advised to keep a watch for the group. Shortly after at 15.31 around 30 protesters were seen in Jubilee Gardens walking towards Shell Centre Tower. They stopped in Jubilee Gardens for a short period whilst playing drums and the Police arrived at 15.40. At 15.42 the protesters began to walk directly towards Shell Centre Tower, crossing over Belvedere Road and, as a result, Shell Centre Tower was placed into "Lockdown".
- 4.9.9 The protesters then proceeded to block Belvedere Road, holding out large banners and posters. It was noted that they were also distributing Ogoni 9 leaflets which suggests that the protestors were not (or at least all of them might not have been) environmental activists. At 16.15 the protesters walked back into Jubilee Gardens and finally dispersed at 16.22. Shell Centre Tower was placed out of "Lockdown" very shortly after at 16.25. Photographs are exhibited at 33 to 35 of **Exhibit KG3**.

#### 12 November 2022

- 4.9.10 On the morning of 12 November 2022, a large group (3,000) of protestors started to arrive in Jubilee Gardens and Belvedere Road and set up tents and stalls. The protestors were seen with banners, handing out leaflets and painting the floor. At 12.10 a small group gathered outside Shell Centre Tower with their banners but returned to Jubilee Gardens very shortly after. By 13.25 all protestors had left the area. Photographs are exhibited at 36 to 37 of **Exhibit KG3**.

#### 21 November 2022

- 4.9.11 At 13.35 on 21 November 2022, 4 protestors set up large speakers on Belvedere Road. Numbers eventually reached around 40 by 14.00, with Extinction Rebellion members playing drums. By 14.50 protestors began to leave the area. Photographs are exhibited at 42 to 43 of **Exhibit KG3**.

#### 12 December 2022

- 4.9.12 On 12 December 2022, activists from Fossil Free London protested outside of Shell Centre Tower in a bid to try and disrupt a function held



at Shell Centre Tower in relation to the departure of CEO, Ben van Beurden. See further:

[Fossil Free London on Twitter: "REVEALED: Celebrate CEO Ben Van Beurden's departure from Shell with noisy resistance & a more \\*ahem\\* honest portrayal of his 39 year legacy working at a leading purveyor of global ecocide. His party: ♀Monday 12th Dec 16:30. Shell Centre, Belvedere Rd https://t.co/6RBRJ3zHXg https://t.co/tEljUYEg2L"/> <https://t.co/tEljUYEg2L> / Twitter. A copy is also found at pages 44 to 45 of \*\*Exhibit KG3\*\*.](https://t.co/6RBRJ3zHXg)

- 4.9.13 At 16:25 one lone protester was seen with a camera outside Jubilee Gardens, shortly after at around 16:35, the number of protestors had risen to about 20.
- 4.9.14 At around 16:55 approximately 30 to 40 activists proceeded across Belvedere Road to stand outside the Shell Centre Tower reception doors. They held Just Stop Oil banners and some had drums, as well as a small number of protestors with loud hailers giving speeches. There were also various people taking photos. There was a small police presence outside the Shell Centre Tower reception.
- 4.9.15 At 17:53 the group left Belvedere Road and walked around Shell Centre Tower, down Chicheley Street and York Road and to the rear barriers by the Black Penny restaurant seemingly looking for a way to get onto the rear Piazza.
- 4.9.16 At 19:24, the protestors eventually all left peaceably. Photographs are exhibited at pages 46 to 47 of **Exhibit KG3**.

#### 11 January 2023

- 4.9.17 On 11 January 2023 at 7.15 an individual was spotted walking from the rear of Shell Centre Tower holding an Extinction Rebellion flag. Shortly after, more individuals began to congregate in Jubilee Gardens and then at 10.06 gathered outside of the Shell Centre Tower reception on York Road. Very soon after at, 10.16, protesters had moved on and left the area. Photographs are exhibited at pages 48 to 49 of **Exhibit KG3**.

#### 24 January 2023

- 4.9.18 At 11.15 on 24 January 2023, 4 individuals tried to gain access to Shell Centre Tower via the revolving doors. Security were able to stop the individuals from accessing on this occasion. Although it is not clear what the individuals' intentions were, one of the individuals handed the welcome host a large plastic cheque and said "on behalf of the British public we want to donate a few billions of pounds to Shell". The individuals were asked to leave and did so promptly after. Photographs are exhibited at pages 50 to 51 of **Exhibit KG3**.

#### 29 January 2023

- 4.9.19 On Sunday 29 January 2023, a group of activists (around 9 protestors in total) used a handheld projector to project a static image onto Shell Centre Tower of flames and which included the words "Shell = Hell". Photographs are exhibited at pages 57 to 58 of **Exhibit KG3**.
- 4.9.20 Whilst it is of course pleasing that the terms of the injunction were abided by, this does show me that protestors continue to have Shell Centre Tower in their sights and will continuously look at finding ways to work around the technical scope and terms of an injunction. This further supports my firm view that if continued injunctive relief were not to be granted, there is a very real risk that protestors would resume the more "extreme" protestor actions such as those described in My First Witness Statement and My Second Witness Statement.

#### 2 February 2023

- 4.9.21 On 2 February 2023, two demonstrations took place; Greenpeace protestors set up a mock petrol station price board displaying profit figures outside Shell Centre Tower following Shell PLC's quarterly announcement – [Greenpeace protests outside Shell HQ in London after record profit announced | Evening Standard](#) and [Shell UK headquarters targeted as it reveals record £32.2bn profits – Activists tell Shell: Stop Drilling. Start Paying | Greenpeace UK](#).
- 4.9.22 The protest commenced at 06.55 with approximately 10 Greenpeace protesters installing a 6-7ft high mock petrol station sign in readiness of Shell PLC's Q4 results being released at 07.30. Once the results were released the profit figure was then displayed on the petrol station sign and a series of photographs were taken. At 08.10 they all left the area.

- 4.9.23 A second demonstration involved protestors dressing up as penguins protesting outside of Shell Centre Tower - [‘Penguins’ protest outside Shell’s London headquarters after record profits announced \(yahoo.com\)](#).
- 4.9.24 At 12.25, around 20 Global Witness protesters arrived in Belvedere Road, stood on the footpath opposite Shell Centre Tower and began singing, shouting and distributing leaflets. The majority of the protesters were wearing penguin costumes and appeared to be of student age (18-25). They continued to peacefully protest until 13.05 and they had all left by 13.15. Photographs are exhibited at pages 79 to 83 of **Exhibit KG3**.

#### 7 February 2023

- 4.9.25 On 7 February 2023, a small gathering by Extinction Rebellion activists took place. At 12.40 there was a small gathering of 5 protesters in Jubilee Gardens with placards. The protestors formed a line and slowly walked across Belvedere Road to the Shell Centre Tower entrance. They then made their way along the Belvedere footpath to Chichley Street where they turned left towards York Road. They then turned left and walked back onto the estate between the 20 York Road and Shell Centre Tower. At the rear of the Shell Centre Tower building, they were spoken to and claimed to be from Extinction Rebellion protesting against Shell profits. The protest was, however, carried out peacefully and at 13.40 they left the area. Photographs are exhibited at pages 84 to 85 of **Exhibit KG3**.

#### 17 February 2023

- 4.9.26 At 15.40 on 17 February 2023, there was a small gathering of 7 protestors in Jubilee Gardens. The protest involved the individuals meditating and holding up placards. At 17.12, the individuals walked around Shell Centre Tower and then packed up and left the area. Photographs are exhibited at pages 86 to 87 of **Exhibit KG3**.

#### 20 February 2023

- 4.9.27 On the morning of 20 February 2023 an individual approached Shell Centre Tower and attempted to force their way in in order to protest / complain about SIPC and / or the wider Shell group of companies (although further details were not provided by the individual). Thankfully on this occasion, the security team were able to physically

block the individual from entering Shell Centre Tower. This experience does reinforce to me that the Shell Centre Tower is a high profile building which is likely to be targeted and that individuals are willing to go beyond what is lawful to try and force their way in and, of particular concern to me is that it is not known what action they plan to take once they are physically inside. Photographs are exhibited at pages 88 to 89 of **Exhibit KG3**.

#### 21 February 2023

4.9.28 On 21 February 2023 at 12.35, a small group of protestors (4 in total) were in Jubilee Gardens with placards. At 13.31, the individuals began packing up and began their slow walk around Shell Centre Tower. The protestors were refused access to Shell Centre Tower and carried on down to York Road before returning to Belvedere Road and began packing up at 14.15. Photographs are exhibited at pages 90 to 91 of **Exhibit KG3**.

#### 26 February 2023

4.9.29 On 26 February 2023 at around 9.27am an individual tore down one of the 22 injunction warning notices that was placed on the hoarding on the staircase at the rear of Shell Centre Tower and, although it was quickly replaced on the same day, this reinforces to me that protestors are clearly paying close attention to the terms of the Shell Centre Tower Injunction Order and are no doubt mindful of the upcoming expiry date. Photographs are exhibited at pages 92 to 93 of **Exhibit KG3**.

#### 14 March 2023

4.9.30 At 13.01 on 14 March, 3 protestors gathered in Jubilee Gardens. The individuals meditated and then began a slow walk around Shell Centre Tower. By 13.42, the protestors returned to Jubilee Gardens and left the area shortly after. Photographs are exhibited at pages 94 to 95 of **Exhibit KG3**.

#### 24 March 2023

4.9.31 On 24 March 2023 at around 13.35, two protestors were spotted heading from Jubilee Gardens onto Belvedere Road and walking around Shell Centre Tower. It is not clear what protest group the individuals were

associated with but they had billboards with the phrases “stop burning fossil fuels” and the Shell logo. Shortly after, at around 13.52 the protestors left. Photographs are exhibited at pages 96 to 97 of **Exhibit KG3**.

4.10 Whilst it is certainly reassuring that the protests at Shell Centre Tower have been largely peaceful since the grant of the Shell Centre Tower Injunction Order, there is growing concern of a “ramping up” of activity to occur during Spring 2023 from certain groups (as is more fully set out in Christopher Gamble’s First Witness Statement). In particular, I note that Just Stop Oil has recently issued an “*ultimatum letter to 10 Downing Street*” on 14 February 2023 – which stated that:

*“Just Stop Oil is demanding that: The UK government makes a statement that it will immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK”.*

*If you do not provide such assurance by 10th April 2023, we will be forced to escalate our campaign – to prevent the ultimate crime against our country, humanity and life on earth...*

*We will not be bystanders”.*

4.10.1 A copy of the relevant statement is exhibited at pages 98 to 102 of **Exhibit KG3**.

4.10.2 Additionally, there also appears to be an increase in attention in the wider Shell businesses and the wider Shell group of companies from other protestor groups with broader interests (such as austerity protestor groups and others engaging in protests against the wider Shell group of companies more generally). Again, this is more fully set out in Christopher Gamble’s First Witness Statement.

## 5. **SECURITY AT SHELL CENTRE TOWER**

5.1 As a result of the activities that took place prior to the grant of the Shell Centre Tower Injunction Order, SIPC has increased security levels at Shell Centre from 10 officers to 13 officers per shift (of which there are four shifts) each day.

5.2 The front entrance opposite Belvedere road is secured by an access control system and single patrol officer. Two security officers now staff the rear entrance and

carry with them a visitor management list (with entry refused at the door if they do not appear on the list).

5.3 However, and as described above, there has been at least one instance of an individual attempting to force themselves past security to gain entry to the Shell Centre Tower. In reality, there are limits to the physical steps and actions officers can take against protestors in preventing access (particularly where there are a large number of protestors involved).

## 6. **RISK OF FURTHER ACTION**

6.1 The Shell Centre Tower Injunction Order appears to have had a positive effect as a deterrent, in light of the peaceful protests described above. However, it is my firm view (in light of other high-profile corporate buildings being targeted coupled with at least one instance of an individual attempting to gain unauthorised entry to the Shell Centre Tower), that if continued injunctive relief were not granted, then the building would be likely to be targeted by protestors who would likely resume the types of unlawful activities as previously experienced at Shell Centre Tower, with a resulting risk of damage and potentially significant disruption to SIPC and the occupants of and visitors to that building.

6.2 Given protestors have paid careful attention to the terms and scope of the Shell Centre Tower Injunction Order, naturally I am confident that protestor groups will also be aware of the upcoming expiry date and will be keeping a close eye on the outcome of these proceedings.

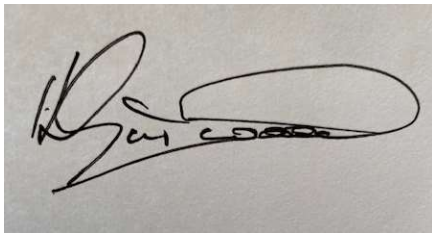
6.3 SIPC remains concerned to take steps to protect the health and safety of its employees, the public and the protestors. Given the further, recent activities carried out by protestor groups since the grant of the Shell Centre Tower Injunction Order, there is nothing to indicate that the action will cease. Indeed it seems protestor action is likely to only increase given the above statement from Just Stop Oil. Maintaining the safety of employees and visitors to the Shell Centre Tower remains my (and SIPC's) primary motivation.

6.4 Whilst I would reiterate again that the wider Shell group of companies, including SIPC, does not seek the continuation of injunctive relief to prevent protestors from undertaking peaceful lawful protests – whether any such protests arise near to or at any of the Shell Centre Tower or otherwise - the actions of the Defendants to date as outlined in detail in this witness statement, My First Witness Statement and My Second Witness Statement and the likelihood of increased activity in 2023

do, I believe, go beyond what can be reasonably tolerated and warrant the continuation of the injunction granted by the Shell Centre Tower Injunction Order.

**Statement of Truth**

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

A photograph of a handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read 'Keith Garwood'.

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Keith Garwood

Dated: 30 March 2023