



Modern Slavery Statement 2024

Financial Year Ending
31 December 2024

WE Soda is committed to preventing slavery and human trafficking in our business and our supply chain.

In line with Section 54 of the Modern Slavery Act 2015, our Modern Slavery Statement sets out the steps we have taken to prevent, detect and respond to slavery in our business and throughout our supply chain during the year ending 31 December 2024.



Read more about our **Anti-Slavery & Human Trafficking Policy** [here](#).

Our Business

Organisational Structure

Since starting production in 2009, the WE Soda Group has developed into a market leader in the manufacture and supply of natural soda ash.

With our registered Head Office located in London, UK, we produce around 5.1 million metric tonnes (mt) of sodium carbonate (soda ash) and sodium bicarbonate from our two production facilities in Türkiye.

Denmar is our port handling services operation, giving us full and direct control of port logistics for our bulk product exports from Türkiye as well as via a comprehensive 'hub and spoke' distribution network across Europe.

In Wyoming US, a small team of around 30 have been working on both a greenfield development project and the acquisition of Genesis Alkali, which was announced in March 2025.

Our total workforce at the end of December 2024 was 1,405 full time employees.

In January 2019, WE Soda appointed a Board of Directors to manage the Group and provide leadership and oversight of its operations. In early 2023, our Sustainability Committee was constituted and has formal responsibility for ensuring that our business operates sustainably, including the oversight of our corporate social responsibilities.

Our Purpose

Our purpose is to responsibly produce essential ingredients for a sustainable future.

The principal activity of our Group is the extraction and processing of trona ore to produce sodium carbonate (soda ash) and sodium bicarbonate.

Soda ash is an essential ingredient used in the manufacture of a wide variety of everyday products such as glass and powdered detergents and, more recently, it has become an important energy transition material used in the manufacture of PV solar panels and the rapidly expanding lithium-ion battery market for electric vehicles.



Operating Sustainably

We publish an [Integrated Annual and Sustainability Report](#) each year in April which details our strategic approach to operating sustainably.

We are very proud that the WE Soda Group was awarded a Platinum medal by EcoVadis for the second year in a row. EcoVadis, an internationally renowned sustainability ratings provider, focus their assessments on key sustainability performance indicators grouped into four themes: Environment, Labour & Human Rights, Ethics and Sustainable Procurement.

The criteria used for their assessments are based on international sustainability standards such as the Global Compact Principles, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI) standard, the ISO 26000 standard, and the CERES principles.

The Labour & Human Rights pillar focusses not only on internal labour practices but also on human rights (including child and forced labour) and human trafficking within our supply chain.

Being awarded a Platinum medal, places us in the top 1% of basic chemicals companies assessed by EcoVadis globally.

Our Group scored strongly above average in all four pillars. Obtaining a rating with EcoVadis provides our stakeholders with third party assurance that we are continuously striving to operate in a responsible manner.

We started working with the Initiative for Responsible Mining Assurance (IRMA), a sustainability mining standard and certification scheme for mines that sets standards for key performance metrics, including human rights, and our objective is to achieve IRMA certification within the next two years.

In Wyoming US, a small team of around 30 have been working on both a greenfield development project and the acquisition of Genesis Alkali, which was announced in March 2025. Our total workforce at the end of December 2024 was 1,405 full time employees.

In January 2019, WE Soda appointed a Board of Directors to manage the Group and provide leadership and oversight of its operations. In early 2023, our Sustainability Committee was constituted and has formal responsibility for ensuring that our business operates sustainably, including the oversight of our corporate social responsibilities.

Sustainability Performance

Our EcoVadis medal and scores



Supply chain



We sell our products to industrial customers in over 80 countries around the world.

Our two production facilities in Türkiye, Eti Soda and Kazan Soda, work with over 1,000 suppliers globally which provide our business with many different products and services from inbound raw materials and equipment to the transportation of outbound finished goods and recycling services.

During 2024, we have been working hard to further improve our sustainable procurement programmes. Since 2021, we have been encouraging our suppliers to become registered members of Sedex, the world's largest data platform for supply chain assessment.



Designed to help companies analyse risk in their supply chain, it has enabled us to screen and vet our suppliers, giving us greater visibility into their ethical trading practices and sustainability performance. We are also working with our lime suppliers to help them achieve Initiative for Responsible Mining Assurance (IRMA) certification.

In 2024, 75% of our core upstream suppliers (those critical to our production process who we used on a repeat basis and represent approximately 90% of total WE Soda Group spend) were on-boarded to the Sedex platform. This enables us to audit suppliers using self-assessment questionnaires submitted to the Sedex platform. On-site supplier visits are made, on a risk-based approach, during which we collaborate and provide support to help them enhance their own practices.

Our Supplier Code of Conduct sets out the criteria and expectations we have of our upstream

suppliers in relation to their business ethics, modern slavery and anti-human trafficking commitments and environmental targets.

Also, during 2024, we appointed experts in sustainable procurement to work with us to develop and implement an enhanced sustainable procurement programme.

Over the next five years, we aim to transform our procurement practices, integrating sustainability into every aspect of our supply chain.



Access our **Supplier Code of Conduct**



Our work with Hestia

As part of our corporate social responsibility programme, we have been working in partnership with Hestia since early 2022.

Amongst other essential services, Hestia provides safe houses and outreach support to victims of modern slavery in London. Initiatives which WE Soda have supported have helped hundreds of survivors of modern slavery in our communities rebuild their lives.

We have also sponsored Art is Freedom, Hestia's annual public art exhibition created by survivors of modern slavery.

→ Access our **the important work being delivered by the team at Hestia.**

→ Access **the On our Streets Report**



"Our partnership with WE Soda delivers impactful and practical help for survivors of modern slavery each year, directly supporting many hundreds of people recovering from exploitation. In addition to the many activities we are able to run thanks to WE Soda's support, the WE Soda Empowerment Fund helps survivors access essential items and pursue their dreams, whether that is accessing a university course, buying a sewing machine, or purchasing items to decorate a flat once they move out of safehouses, and make it their own. The ability to choose these items on their own is critical in helping them feel in control again, which is hugely important in their journey to recovery, but above all, WE Soda's continued support creates room for hope and purpose to flourish."

Alison Logier

Director of Modern Slavery Response,
Hestia

we • soda
WEST EAST SODA

IN PARTNERSHIP WITH



Our Policies on **Anti-Slavery and Human Trafficking**



WE Soda acknowledges that modern slavery is a heinous crime resulting in the abuse of human rights and must be eradicated.

We are committed to ensuring there is transparency in our approach to tackling modern slavery within our organisation and throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. To meet these obligations, we have committed to a number of initiatives which steer our approach to modern slavery compliance.

Our statement and policy on Anti-Slavery and Human Trafficking is communicated to all employees, and furthermore the policy forms part of our Business Ethics training programme and our Employee Handbook.

Both Eti Soda and Kazan Soda renew their ISO26000 Social Responsibility certification annually. In addition, we conduct an annual third-party audit at our production sites to ensure that no acts of modern slavery are committed within our business.

- Access our **Anti-slavery and human trafficking policy statement**
- Access our **Anti-slavery and human trafficking policy**
- Access our **Modern Slavery opinion statements**



Our Training Programmes

It is estimated that today around 17,000 people¹ suffer from modern day slavery in the UK. Across the world, the number rises to almost 50 million². 52%³ of forced labour and human exploitation occurs in high to middle income countries.

Our Supplier Code of Conduct, Statement on Business Ethics and other company policies require that our suppliers, employees, contractors and any third parties acting for, or on behalf of, our company do not commit, authorise or be involved in any unethical business practices. These policies set our expectations with regards to third-party management, health and safety, human dignity and labour, and anti-slavery and human trafficking.

WE Soda ensures that all staff are trained to recognise the signs of modern slavery and human trafficking and on a periodic basis employees refresh their knowledge of this important topic. This would include noticing that an individual

is providing inconsistent information, does not have their own bank account or is being transported to work at unusual times or in a group with others.



Our training and policies ensure all of our employees are actively aware of modern slavery and their responsibilities to report any concerns whether within our own business or within our supply chain.

→ Access our [Supplier Code of Conduct](#)

→ Access our [Statement on Business Ethics](#)

Our employees can convey any concerns and report potential violations of our Business Code of Ethics through any of the reporting channels detailed in our Whistleblowing Policy or via our designated **we • speakup** programme.

Email:
wespeakup@wesoda.com

**we
speak
up!**



Responsibility for the policy



The Board of Directors has overall responsibility for ensuring the Group's policies, systems and controls comply with our legal and ethical obligations, and that all those under our control comply with it.

For and on behalf of WE Soda Group.

Alasdair Warren
Director, Chief Executive Officer

19 June 2025



Didem Ciner
London, UK
Chair



Alasdair Warren
London, UK
Chief Executive
Officer



Ahmet Tohma
London, UK
Chief Financial
Officer



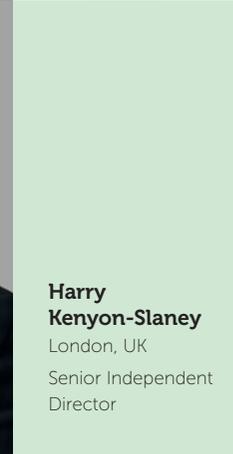
**Mehmet
Ali Erdogan**
London, UK
Chief Legal Officer



Nicholas Hall
London, UK
Chief Strategy
& Risk Officer



Rosalind Kainyah
London, UK
Independent Non-
Executive Director



**Harry
Kenyon-Slaney**
London, UK
Senior Independent
Director



**Sir Peter
Westmacott**
London, UK
Independent Non-
Executive Director



Sait Ergun Ozen
London, UK
Independent Non-
Executive Director



**Samantha
Hoe-Richardson**
London, UK
Independent Non-
Executive Director



Gürsel Usta
Istanbul, Turkey
Non-Executive
Director

