

WE Soda Limited
Statement on Modern Slavery for the Financial Year
ended 31 December 2019

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015.

Organisation's structure

WE Soda's head office is in the United Kingdom. As a result of a restructuring exercise that spanned from 2017 to 2018, WE Soda has grown from a company with 4 employees in 2017 to group with 1,600 employees by the end of 2018. WE Soda operates through a number of companies based in Turkey and the USA. The Group's operation is governed by 3 legal, political and economic jurisdictions; UK, USA and Turkey. In January 2019, WE Soda appointed a board of directors to manage the Group and provide leadership and oversight over its operations and corporate social responsibilities.

Our business and supply chain

The principal activities of the Group are mining for trona and producing sodium carbonate (soda ash) and sodium bicarbonate in Turkey and USA. The Group has 3 main operating companies, Eti Soda and Kazan Soda in Turkey and Ciner Wyoming LLC. (Ciner Wyoming) in the USA. These three entities supply product to customers located in over 40 countries around the world. We work with approximately 2200 suppliers globally who provide our business with many different products and services such as inbound raw materials and equipment along with outbound finished goods transport and recycling services

Our policies on slavery and human trafficking

WE Soda acknowledges that modern slavery is a heinous crime resulting in the abuse of human rights and must be dealt with. WE Soda is committed to ensuring there is transparency in our approach to tackling modern slavery within our organisation and throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. In order to meet these obligations, the Company plans to:

- Adopt Group-wide policies on modern slavery and ensure that the policies are communicated to the whole Group by end of 2020
- Develop and distribute a Supplier Code of Conduct to all suppliers by end Q1 2021 and incorporate Modern Slavery/Conduct clauses in all supplier contracts by end 2021, or on contract renewal date, whichever earlier
- Conduct a complete review of the Group's exposure to modern slavery. Ensure modern slavery is not taking place anywhere within our own business by end Q1 2021 and within our distributor network by end 2021
- Complete appropriate and relevant "know your supplier" due diligence and auditing by end of 2021 to monitor supplier conduct

Responsibility for the policy

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

For and on behalf of WE Soda Group:

Mehmet Ali Erdogan
Director
23 September 2020