



Statement on Modern Slavery

For the financial year ending 31 December 2021



**Our
business**



Introduction

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 in the year ending 31 December 2021.

Organisational Structure

Since starting operations in 2009, the WE Soda Group has grown from one production site in Turkey, to three sites, two in Turkey and one in the US, with our registered Head Office located in London. In January 2019, WE Soda appointed a Board of Directors to manage the Group and provide leadership and oversight of its operations and corporate social responsibilities. In December 2021, the Group sold a 60% controlling interest in our US operations. For the majority of 2021, until the sale of a controlling stake in our US operations, we had over 1,750 employees and were governed by three separate legal, political and economic jurisdictions.



Our business and supply chain

The principal activity of the Group is extracting and processing trona ore to produce sodium carbonate (soda ash) and sodium bicarbonate, which is used in the manufacture of a wide variety of everyday products such as glass, detergents and lithium-ion batteries for electric vehicles. During 2021, the Group had three operating entities, Eti Soda and Kazan Soda in Turkey and Ciner Wyoming in the USA. Through these three entities, WE Soda supplied products to customers located in over 70 countries around the world and also worked with over 1,000 suppliers globally, who provided our business with many different products and services from inbound raw materials and equipment to outbound finished goods transportation and recycling services.



Operating Responsibly

During 2021, our production sites completed annual EcoVadis assessments and Gold medals were awarded to Eti Soda in Turkey and Ciner Wyoming in the US and a Silver medal was awarded to Kazan Soda, in Turkey. This is a significant improvement on the previous year, when all three sites we awarded Silver medals.



Our three mines all hold EcoVadis Medals

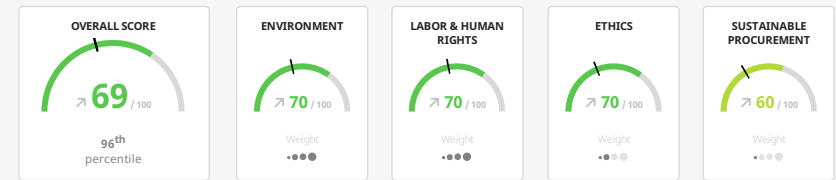
All operating entities gained an EcoVadis sustainability rating in the 90th percentile or better, when compared with all other companies in the same industry category.

EcoVadis, is an internationally renowned sustainability ratings provider and their assessments focus on key performance indicators which are grouped into four themes: Environment, Labour & Human Rights, Ethics and Sustainable Procurement. These criteria 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.

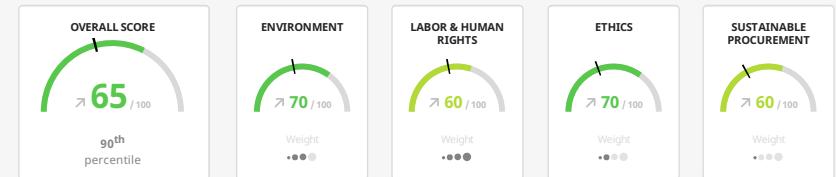


Credit: Hestia

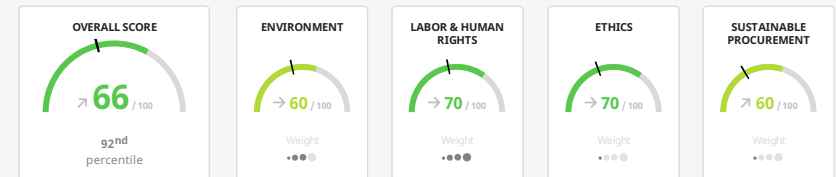
Eti Soda



Kazan Soda



Ciner Wyoming



In addition, all our sites scored strongly above average in all four pillars with both Eti Soda and Ciner Wyoming scoring 70% for Labour & Human Rights, which focusses not only on internal labour practises but also external human rights including child and forced labour, and human trafficking. During 2022, it is WE Soda’s objective to undergo a Group EcoVadis assessment with the target of achieving Gold medals at all sites during 2023.

During 2021, we updated our Supplier Code of Conduct to include clauses which set out our expectations of suppliers in relation to their own modern slavery and anti-human trafficking commitments. In addition, we also conducted annual audits to ensure there were no acts of modern slavery committed within our business and across our supply chain.



Sedex Member

WE Soda intends to further improve its sustainable procurement achievements through its Supplier-Buyer membership of Sedex, one of the world's leading platforms designed to help companies manage and improve working conditions in their global supply chains. By encouraging our own suppliers to join Sedex and through the interlinked relationships on the platform, supply chain transparency is enhanced leading to more responsible sourcing and ethical trading practises and improved corporate sustainability.

Our objective is to have over 100 of our largest suppliers on the Sedex platform by the end of 2022 which will represent approximately 50% of our total annual procurement spend. Additionally, in 2022 we have committed a budget of over £6,000 to support our suppliers with on-boarding and completing their Sedex Self-Assessment Questionnaires (SAQs).



Tackling modern slavery



1 in 4 victims of modern slavery are children



40 million people are trapped in modern slavery of which 71% are women and girls

Source: ILO 2017



The ILO estimates that **24.9 million people worldwide are victims of forced labour**

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 eradicated. 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, we have committed to a number of initiatives which steer the Group's approach to modern slavery compliance.



In 2020, we adopted a Group-wide policy on modern slavery, ensured that the policy was communicated to the whole Group and that 100% of our employees completed modern slavery training. During 2021, all new employees had modern slavery training incorporated into their induction programme.

Both Eti Soda and Kazan Soda renewed their ISO26000 certification which included completion of a Modern Slavery Audit. Ciner Wyoming and our offices in Atlanta, US and London, UK completed self-assessments against the same third-party audit questionnaire during 2021.



In 2021, we instructed a third party to carry out due diligence on a number of charitable organisations helping victims of modern slavery, in order to fulfil our objective of providing support for victims. As a result of this exercise, WE Soda has identified a partner with whom we will be working during 2022 on a number of initiatives.



< **Didem Ciner**
 London, UK
 Chair of the Board
 Director of WE Soda
 and Ciner Glass Ltd, and
 President of Ciner Media.



^ **Gürsel Usta**
 Istanbul, Turkey
 Chairman of the Board
 Deputy Chair of WE Soda.



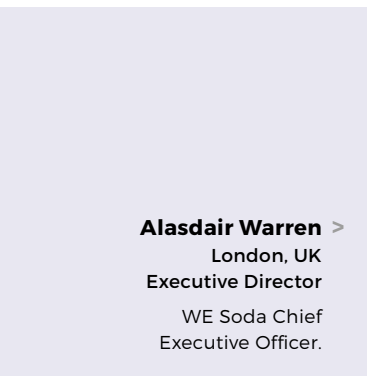
< **Mehmet Ali Erdogan**
 London, UK
 Executive Director
 WE Soda Chief Legal Officer.



Ergun Ozen >
 London, UK
 Non-executive Director



< **Vasileios Papakalodoukas**
 Istanbul, Turkey
 Non-executive Director



Alasdair Warren >
 London, UK
 Executive Director
 WE Soda Chief
 Executive Officer.



Ahmet Tohma >
 London, UK
 Executive Board Director
 WE Soda Group Chief
 Financial Officer.



Sir Peter Westmacott ^
 London, UK
 Non-executive Director



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. Our training and policies ensure that 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.

For and on behalf of WE Soda Group:

Mehmet Ali Erdogan
 Director, Chief Legal Officer
 21 April 2022



23 College Hill • London • EC4R 2RP • United Kingdom

www.wesoda.co.uk