

A close-up photograph of several purple flowers with green stems and leaves, serving as the background for the document's title page.

# Modern Slavery Statement

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Financial Year Ending 31st December 2022



WE Soda is committed to preventing slavery and human trafficking in our business and 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 2022.

# 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. We produce over 5 million tonnes of sodium carbonate (soda ash) and sodium bicarbonate from our two production sites in Türkiye, with our registered Head Office located in London. At the end of December 2022, we had 1,373 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 our business operates sustainably, including the oversight of our corporate social responsibilities.

## Purpose and supply chain

Our purpose is to responsibly produce essential ingredients for a sustainable future. The principle activity of the Group is extracting and processing trona ore to produce sodium carbonate and sodium bicarbonate, used in the manufacture of a wide variety of everyday products such as glass, detergents and more recently the rapidly expanding lithium-ion battery market for electric vehicles.

During 2022, the Group's two operating entities in Türkiye, Eti Soda and Kazan Soda, sold our products to industrial customers in almost 80 countries around the world, as well as working 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 Sustainably

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.

Obtaining a rating with EcoVadis provides our stakeholders with third party assurance that our Group is continuously striving to operate in a responsible manner. We are very proud that Eti Soda was awarded a Gold medal by EcoVadis for the 2021-2022 period, this was followed by a Silver medal for Kazan in early 2022.

Later in the year the WE Soda Group submitted its first EcoVadis assessment and was awarded a Gold medal. This places the group in the 97th percentile of companies rated in the same chemicals sector.

Our sites and the Group scored strongly above average in all four pillars. The Labour & Human Rights pillar focusses not only on internal labour practices but also external human rights including child and forced labour, and human trafficking.

Kazan Soda will receive its new rating in early 2023. We have a target of achieving at least Gold in all EcoVadis assessments during 2023 and you can check on our progress [here](#).

## Sustainability Performance and Labour & Human Rights Scores



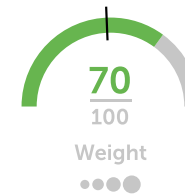
WE Soda 22/23



Insufficient Partial



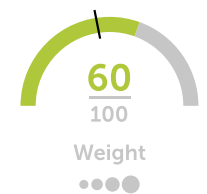
Eti Soda 21/22



Good Advanced



Kazan Soda 22/23



Outstanding Av. score



# Our work with Hestia

As part of our corporate social responsibility programme, we have been working in partnership with Hestia in the UK since early 2022. Amongst other essential services, Hestia provides safe houses and outreach support to victims of modern slavery in London. Hestia's modern slavery service started in 2011 supporting more than 5,000 victims since then. You can read more about the great work Hestia does [here](#).

During 2022, through our work with Hestia WE Soda has funded three important programmes for survivors of modern slavery during 2022: The undergarment project which provides dignity for survivors who very often access Hestia's services with limited personal possessions; art therapy workshops to aid mental health recovery and combat isolation; and wellbeing activities aimed specifically at child survivors.

*When we start working with a survivor, being able to offer them this support not only gives them something they often desperately need, it is a gesture of kindness and can go a long way in helping them to know that they now have autonomy.*

**Hestia Manager**  
regarding "The Undergarment Project"

27 survivors of modern slavery were able to take part in 10 art workshops thanks to WE Soda's support. These workshops included two photography courses (one three-day course and one seven-week course).

After the workshops were completed, the artwork was curated into an exhibition which opened on Anti-Slavery Day, 18 October 2022, in multiple locations across London.

This included at Trafalgar Square and in London Bridge, Waterloo and South Kensington train stations. Network Rail estimated the exhibits were seen by 4.5 million people. This type of programme not only helps survivors but increases awareness of modern slavery amongst the public in general.

In 2022, for the first time, the art exhibition was co-curated by survivors of modern slavery alongside HRH Princess Eugenie and her organisation, The Anti-Slavery Collective.

*It is inspiring to see the project give survivors the opportunity to express their feelings, emotions and stories through art. This exhibition serves as a space to dispel the stigma around survivors, and let their stories speak for themselves.*

**HRH Princess Eugenie,**  
Co-founder of The Anti-Slavery Collective



IN PARTNERSHIP  
WITH



## Art Is Freedom Collage

A collaborative piece created by  
14 survivors of modern slavery.



# Sustainable Procurement

WE Soda has been working to further improve its sustainable procurement achievements and in 2021 we introduced a vetting process using the Sedex platform, allowing us to screen our suppliers' sustainability approach and performance alongside our own supplier code of conduct criteria and expectations.

Sedex, one of the world's leading platforms designed to help companies manage and improve working conditions in their global supply chains.

During 2022 through Supplier-Buyer membership we registered nearly 60% of our suppliers (by value) onto the Sedex platform to allow us to more effectively screen our suppliers in relation to their ethical trading and responsible supply chain practices.

Our [Supplier Code of Conduct](#) was also updated to include clauses on conflict minerals and our expectations of suppliers in relation to their own modern slavery and anti-human trafficking commitments.

During 2023 we aim to register more than 80% of our core suppliers (with whom we do repeat business, by value) and by 2025, we aim to have all of our major distributors operating with our sustainability governance.

Also in 2023, a project we have initiated through a collaboration with Ernst & Young will develop a procurement tool, using a platform called Promena, which will further enhance our upstream supplier management, driving greater sustainability transparency within our supply chain. By encouraging our own suppliers to join Sedex and through the interlinked relationships between the two platforms, supply chain transparency will be further enhanced, leading to more responsible sourcing and ethical trading practises and improved corporate sustainability.



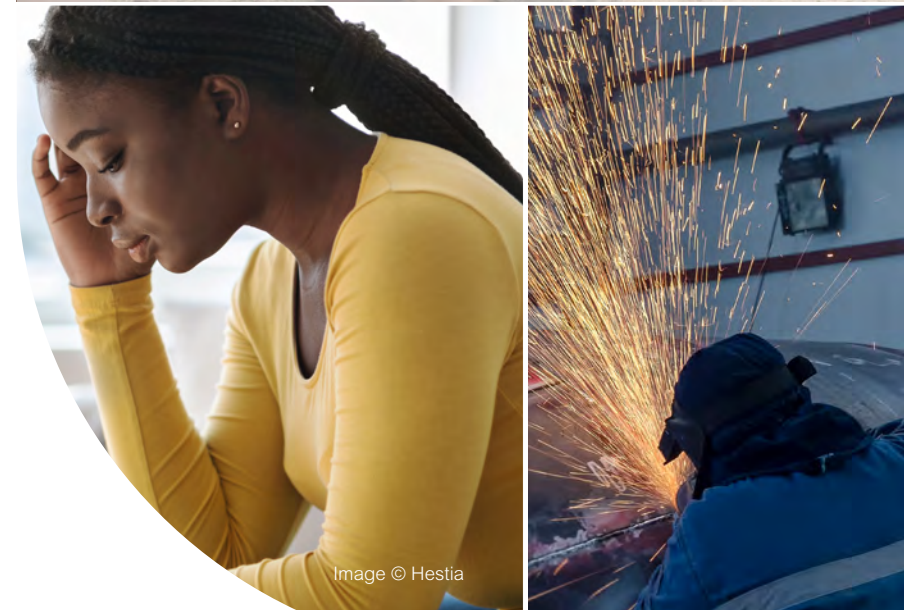
# Our Policies on Slavery and Human Trafficking

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.

**To meet these obligations, we have committed to a number of initiatives which steer the Group's approach to modern slavery compliance.**

Our policy on modern slavery is communicated to the whole Group and all new employees complete a modern slavery training module. On a periodic basis staff refresh their knowledge of this important topic, furthermore the policy forms part of our Business Ethics training programme & Employee Handbook.

Both Eti Soda and Kazan Soda renewed their ISO26000 certification during 2022 which included completion of annual audits to ensure there were no acts of modern slavery committed within our business and across our supply chain.



# 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  
16th June 2023







**Didem Ciner**  
London, UK  
Chair



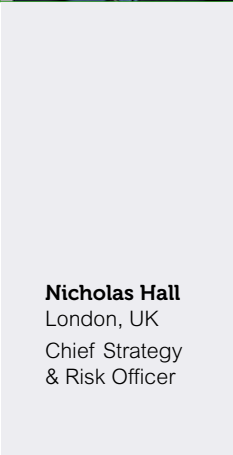
**Alasdair Warren**  
London, UK  
Chief Executive  
Officer



**Ahmet Tohma**  
London, UK  
Chief Financial  
Officer



**Mehmet  
Ali Erdogan**  
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Director



**Sir Peter  
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**Samantha  
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**Gürsel Usta**  
Istanbul, Turkey  
Non-Executive  
Director

