

# Statement on Modern Slavery

For the financial year ending 31 December 2020



## Our business



## Introduction

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

## Organisational Structure

WE Soda's head office is in the United Kingdom and with production sites in Turkey and the USA, operations are governed by 3 separate legal, political and economic jurisdictions. Following a restructuring exercise between 2017 and 2018, WE Soda has grown from a company with 4 employees in 2017 to group with over 1,750 employees at the end of 2020. 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.





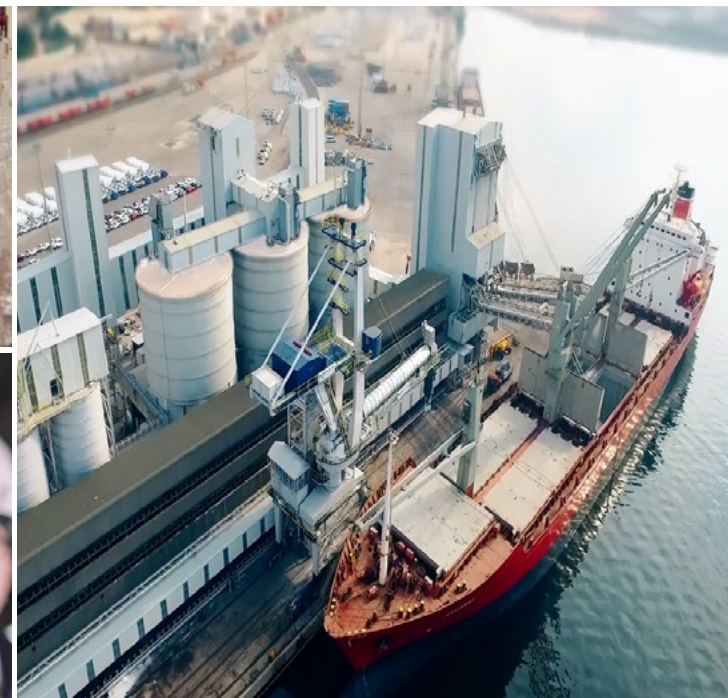
Our three mines all hold  
EcoVadis Silver Medals

## Operating Responsibly

During Q4 2020 all our production sites were audited and awarded Silver Medals by EcoVadis the renowned universal sustainability ratings provider. WE Soda and our three production sites are also all Supplier Members of Sedex. Sedex is one of the world's leading online platforms designed to help companies manage and improve working conditions in global supply chains, improve their responsible and sustainable business practices, and source responsibly.

**Sedex**<sup>2</sup> | Member





## 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 over 2000 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.





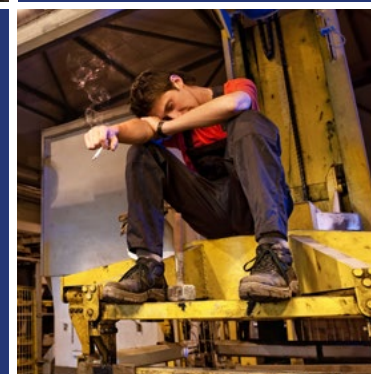
## Tackling modern slavery



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



**5.4 victims of modern slavery for every 1,000 people**



**1 in 4 victims of modern slavery are children**

## 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 has set out a number of initiatives which steer the Group's approach to modern slavery compliance.

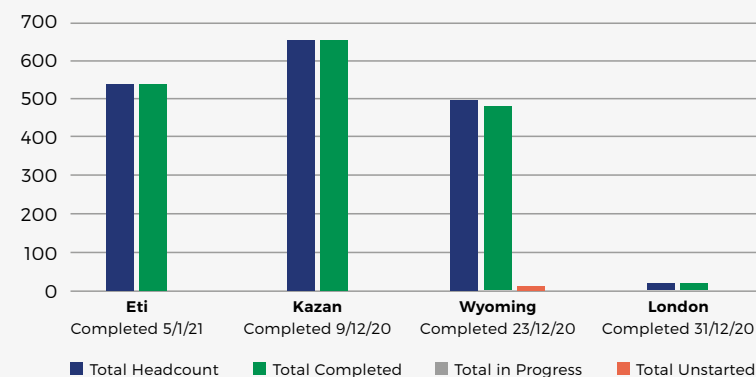




- **Adopt Group-wide policies on modern slavery and ensure that the policies are communicated to the whole Group by end of 2020.**

*Update:*

**Modern Slavery Statement & Policies -  
Training & Communications**



99% of our staff had completed training by end Q4 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.**

*Update:*

Our Supplier Code of Conduct human dignity and labour clauses were updated. These set the expectations of our suppliers in relation to modern slavery, human trafficking, child & forced Labour, working hours and wages along with other ethical trading standards such as environment, health & safety. The 2021 Supplier Code of Conduct was distributed to all our suppliers by 31 March 2021 and is available to view on our website.





- **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.**

**Update:**

Eti Soda and Kazan Soda are ISO26000 certified which includes completion of a Modern Slavery Audit. Ciner Wyoming and our offices in Atlanta and London completed self-assessments against the same third-party audit questionnaire.



- **Complete appropriate and relevant “know your supplier” due diligence and auditing by end of 2021 to monitor supplier conduct.**

**Update:**

We have upgraded our Sedex membership in order to enhance our ability to risk assess suppliers using this internationally recognised platform. In future we will require our suppliers to become members of Sedex and complete their own SAQ (self-assessment questionnaire), thereby encouraging greater transparency and ethical trading practice within the industry.

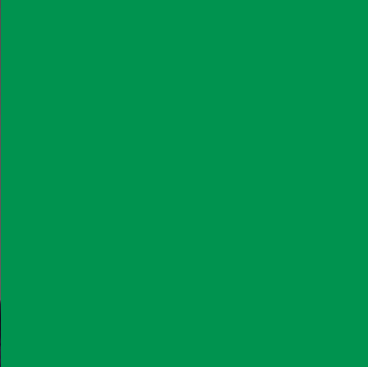
- **During 2021 we plan to work with a verified charitable organisation to support their work helping victims and eradicating modern slavery.**



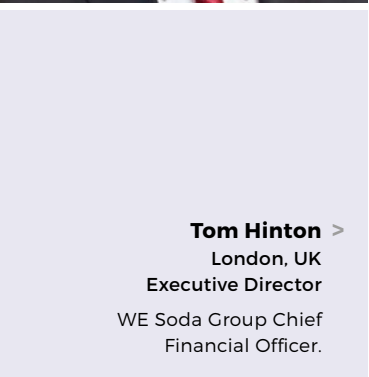
< **Gürsel Usta**  
Istanbul, Turkey  
Chairman of the Board  
President & CEO of Glass and  
Chemical, Ciner Group.



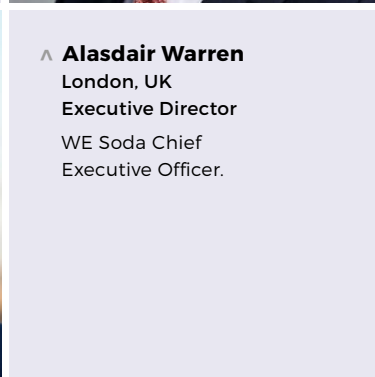
^ **Alasdair Warren**  
London, UK  
Executive Director  
WE Soda Chief  
Executive Officer.



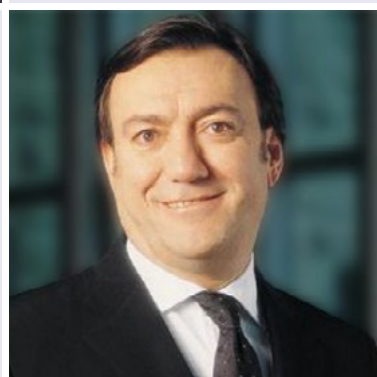
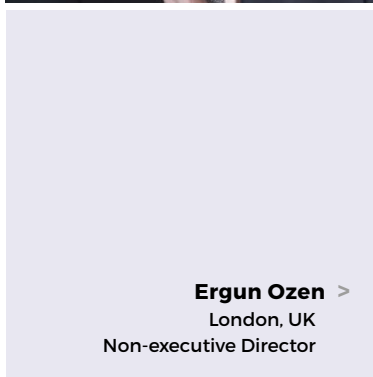
< **Mehmet Ali Erdogan**  
London, UK  
Executive Director  
WE Soda Chief Legal Officer.



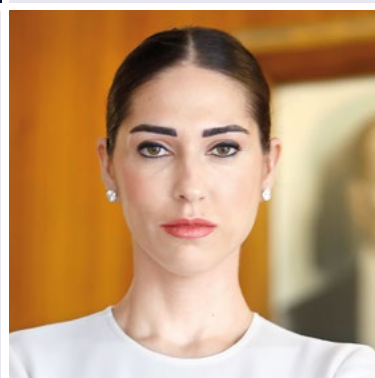
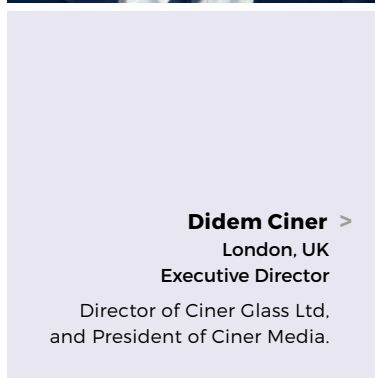
**Tom Hinton** >  
London, UK  
Executive Director  
WE Soda Group Chief  
Financial Officer.



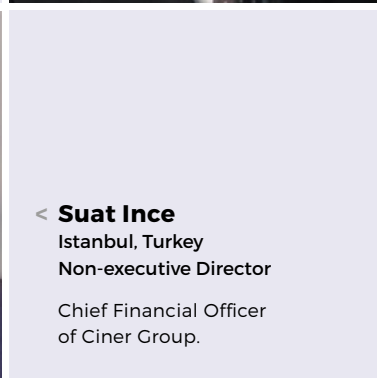
**Ergun Ozen** >  
London, UK  
Non-executive Director



**Didem Ciner** >  
London, UK  
Executive Director  
Director of Ciner Glass Ltd.  
and President of Ciner Media.



**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 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

26th May 2021





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

[www.wesoda.co.uk](http://www.wesoda.co.uk)