

# Sustainability Committee Community Investment Policy

**POL.21-01**

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**WE SODA LTD**  
**SUSTAINABILITY COMMITTEE**  
**COMMUNITY INVESTMENT POLICY**  
**Adopted by the Board in November 2025**

**1. PURPOSE**

To update the community investment, policy presented in November 2024, with intention of signing this at this month's board meeting.

**2. SCOPE**

In November 2024, the WE Soda Board approved a draft of a Community Social Investment Policy aimed at developing a common governance model of community initiatives across the company. Regarding this, onsite sessions with critical partners were held at UK, Eti Soda and Kazan Soda between July and September; to test the principles, how they applied to existing community projects and how this new policy will be operationalised. As a result, this paper includes an updated version ready for board approval. **The work completed this year includes:**

- Preparation and development of evaluation forms to log and test the current and potential community projects.

- Consultation with colleagues in UK, Eti and Kazan Soda to make sure that there are reflection of operational reality and the local needs in the templates.

- Coalescence of stakeholder responses, resulting in edits to the draft submitted last year, but producing that we believe work at group and site level.

- Introduction of digital-based tracker to track the regularity of monitoring, which will allow taking KPI-based control, and will provide a more significant quantification of impact.

As a result, WE Soda has established a robust, site-level system to manage community investments, ensuring transparent governance and clear accountability. This enables our community projects to better demonstrate their contribution to sustainability goals and to be presented to shareholders in a more meaningful and trackable way.

**3. BACKGROUND**

WE Soda's operations are inherently site-based and closely integrated with local communities, particularly at the Kazan site near Ankara where the mine sits amid small villages. As a responsible operator, WE Soda implements projects around employment, environmental protection and community wellbeing locally, while also running community programmes at scale in Turkey, the UK and the US.

However, heightened regulatory and stakeholder scrutiny means we must set clearer objectives and robust monitoring to demonstrate impact and safeguard our social license to operate. Strengthening local and global project objectives, and applying rigorous measurement and monitoring, will both improve the effectiveness of WE Soda's community investments and ensure that local communities derive meaningful benefits. Therefore, the work we have undertaken this year, is outlined in the table below.

<b>Objective</b>	<b>Method(s)</b>
Revise policy for real-world community needs	<ul style="list-style-type: none"> <li>• Talks with NGOs</li> <li>• Public Research</li> </ul>
Review and improve programmes	<ul style="list-style-type: none"> <li>• Conducting Site Visits</li> <li>• Discussions with Key Personnel</li> </ul>
Identify and fix site-level issues	<ul style="list-style-type: none"> <li>• Review of Yearly Projects</li> <li>• Follow-up Assessments</li> </ul>
Create a standard evaluation template	<ul style="list-style-type: none"> <li>• Community Program Site Visit to Understand the Process</li> </ul>
Digitalise M&E into a central database	<ul style="list-style-type: none"> <li>• Discussion with IT Personnel</li> </ul>

#### **4. WORK CONDUCTED AND EVALUATION**

Within this project, initiatives at Eti Soda and Kazan Soda, as well as nationwide programmes, were assessed under four pillars:

- Water, Nature & Climate Resilience
- Gender Equality & Diversity
- Community Wellbeing
- Education & Skills Development

The pillars in more detail,

##### **Water, Nature & Climate Resilience**

- Beyond the plant boundary, WE Soda supports reliable water access for neighbouring communities. In this drought-prone region, we have installed four public fountains in surrounding villages and provided targeted supply during shortages. Strengthening local water resilience remains a core priority.
- Forward plan includes elevating water stewardship with a focused project pipeline to reach water-positive performance at priority sites, while embedding site-level climate resilience measures across operations.

##### **Gender Equality & Diversity**

- Ongoing efforts support the social inclusion of local women. Under WE Soda's sponsorship, the greenhouse initiative with the Metropolitan Municipality promotes women's employment, providing local women with sustainable income opportunities and greater participation in community life.
- Aligned with UN Global Compact (UNGC) and Women's Empowerment Principles (WEPs), WE Soda will develop new Gender Equality and Diversity plans covering both internal operations and local stakeholders. These will go beyond employment, addressing wellbeing, inclusion and diversity through stronger NGO partnerships in the coming period.

##### **Community Wellbeing**

- In villages neighbouring both plant sites, an estimated 4 of every 25 employable residents work within WE Soda, indicating strong local livelihood impact. Also with beyond organised programmes we deliver responsive local infrastructure & community well-being projects to meet the most immediate needs (e.g., small renovations, public amenities, emergency assistance).

- We believe this pillar represents one of WE Soda's strongest areas. The company maintains healthy, long-standing relationships with the communities surrounding its plants, supported by an effective and well-structured communication system.

### **Education & Skills Development**

- WE Soda's largest community investment is the Koç University Scholarship programme, providing full funding for 40 students with an average support of US\$13,950 per student, around 2.6 times the Turkish national average. In addition, about 80 students from the Kazan and Eti regions receive local scholarships focused on industry-related fields that offer clear pathways to internships and employment.
- Extend education impact beyond university to middle-school level through STEM outreach, teacher support, site visits and mentorship, linking to internships and apprenticeships to build a pipeline from school to employment; in parallel, expand collaborations with leading Ankara universities to co-develop curricula, research placements and talent pathways.

## **5. ACTIONS**

- Assessment templates were developed (attached) to evaluate both large-scale and local community projects.
- These templates agreed with key people: 1 Tuğçe Beşir (Eti Soda), Faruk Sülüki (Kazan Soda), and Craig Rood (WE Soda USA).
- The Community Social Investment Policy was revised and expanded to include previously missing areas such as Health & Safety and Human Rights, ensuring a more comprehensive governance structure.
- A number of existing projects have entered the reassessment phase, being reviewed against the revised policy and updated assessment templates.
- Initial discussions have begun with NGOs to explore new project opportunities under the revised framework, with an emphasis on measurable and strategic partnerships.

## **6. NEXT STEPS**

### **Policy**

- This has been revised and is included in this paper for approval.

### **Digital tracking of projects**

- A digital tracker will be introduced so project leads can upload documents for both large- and small-scale projects after approval.
- This will create a robust database, enable better project oversight, and provide valuable data for future planning.

### **NGO collaborations**

- We aim to expand WE Soda's programmes and partnerships, particularly around these in the sustainability plan, water stewardship and Nature Positive, through stronger NGO collaboration.
- We have contacted 15+ NGOs in Türkiye and are discussing potential programmes for the upcoming period.

- The most suitable programmes for WE Soda will be selected within a defined budget and evaluated accordingly.

### West Soda (US operations)

- The same sustainability project framework and digital tracking system will be established across WE Soda’s US operations.
- In the next phase, we intend to assess all US projects using this standardised approach.

## 7. IMPACT

	Before November 2024	November 2024- August 2025	August 2025 -
<b>Program Policy Alignment</b>	-	New programs adjusted to align with the policy	Programs continue to be developed in compliance with the new policy.
<b>Corporate Social Investment Policy</b>	-	Introduced following pre-implementation brainstorming.	Revised and ready for implementation.
<b>NGO Partnerships &amp;</b>	Collaborations previously conducted without a formal policy framework.	Partnerships and NGO collaborations now developed in accordance with the policy at the community level.	New partnerships established both at the community level and in environmental areas, particularly focusing on water stewardship.
<b>Governance</b>	-	Introduced	Implemented under the new policy using the new assessment forms.
<b>Monitoring</b>	-	-	Community programs and expenditures are being monitored digitally.

## 8. REVIEW AND EVALUATION

We are shifting the non-integrated, ad-hoc community responses to a single, policy-driven initiative with effective governance, uniform assessment forms, and online monitoring, which provides transparency, accountability, and quantifiable outcomes. The updated Community Involvement Policy, which is developed in partnership with site teams and stakeholders, now informs project selection and evaluation, whereas expanded NGO partnerships will provide more robust and KPI-monitored results. This combined strategy should make WE Soda placed in a continuous betterment of its social investments, evidence to shareholders, and development of long-term value to the local communities.

# Corporate Social Investment Strategy

## 1. Setting the Context

Acting as a good neighbour, in a fair and ethical way in all markets where we conduct business is of the utmost importance in achieving business and operational excellence at Kew Soda Ltd/WE Soda Ltd and its subsidiaries (and references to “Company”, “WE Soda”, “Group”, “we”, “our”, “us”, and similar shall refer to the Kew Soda Group). We are committed to conducting our business in a manner that is ethical, right, and that does not intentionally negatively impact any competitor, customers or actor in our market or supply chain.

### 1.1 Purpose of this Policy

This policy provides guidance in relation to our Social Investment Strategy the decisions we make regarding resources we commit to various initiatives which have community and social impact.

### 1.2 Scope of this Policy

This policy applies to all employees of Kew Soda Group including both full-time and part-time employees, contractors, interns and any other affiliates of the Kew Soda Group wherever we do business and compliance with the Policy and law is mandatory for every employee, regardless of his/her location.

### 1.3 Roles & Responsibilities

To ensure effective understanding and implementation of this Policy, the Company has delegated roles and responsibilities as set out below.

The primary point of contact for any questions or concerns related to the contents of the Policy is the CSO.

## 2. Social Investment Strategy Purpose

Our corporate social investment purpose is to ensure we are and seen to be, a proactive member of the community, providing contribution to the communities that are close to our sites (or an occasions value chain).

Our focus is on helping address the most pressing needs of the community, and where we have a unique or important contribution to offer (through the skills, we have, assets or other).

## 3. What Are Our Social Investment Selection CRITERIA & Principles

### 3.1 Type of Support will be allocated according to one of four core themes:

- Local needs: as identified and justified by the site GM
- Global support: to help create and strengthen soda-ash’s contribution to a low carbon and circular economy
- Shared value: partnerships with academics and others to further sustainability thinking that helps both society and our business
- Emergency relief

### 3.2 Themes will be categorised into:

- Water, Nature & Climate Resilience

- Gender Equality & Diversity
- Community Wellbeing
- Education & Skills Development

**3.3 Nature of Support** will be classified into: Financial, Support in Kind or, a combination of both.

### 3.4 Governance

**Identification:** projects will be shaped by working within local communities to find what projects emerge as being optimum.

**Selection:** projects will be written up by the recipient according to a framework in order to allow assessment of the project and approval of funding before the project is commenced. The completed WE Soda Social Project Assessment Template must be submitted with each proposal and will be used to assess and select projects; no project will be approved without a completed template.

**Approval:** Projects will be presented to the site GM for approval. Projects are reviewed annually by the Sustainability Committee. All existing and new projects will have such a proposal, and no new project will be funded without one. Existing projects will have one created and agreed retrospectively, if the intended duration is beyond Dec 2024

**In-Kind:** support will be dealt with on a case-by-case basis but will be signed off by the Site GM and shared with the Sustainability Committee

**Digital Tracking:** All community projects must be recorded in the Corporate Community Projects Tracker. The Tracker will store project metadata, theme tags, owner, country, dates, budget, KPIs, SROI estimate, documents and status, and will be used for quarterly and annual reporting.

**3.5 Sites, Allocation & Resources** Sites are defined as our sites where we manage, make and move our product. The budget is proposed by the respective Site General Manager, with no formal upper limit. Allocation of budget and resources will ensure that there will be capacity and capability across the business to manage these projects

**3.6 Health and Safety Governance** require WE Soda to ensure that all projects it undertakes or supports are implemented in accordance with appropriate health and safety (H&S) standards.

**3.7 Human Rights & Labour Standards** WE Soda needs to ensure that its activities and those carried out on its behalf do not violate human rights or labour standards. Compliance must be confirmed at project initiation, during implementation and at project closure, and any breaches must be remediated and reported to the Sustainability Department.

**3.8 Measurement and monitoring** will ensure our social investment strategy is effective and adding social value or giving a return on investment. Ongoing monitoring is required during implementation and a post-implementation evaluation should be completed within 90 days. Monitoring data, supporting evidence and evaluation reports must be uploaded to the Corporate Community Projects Tracker.

### 3.1 Type of Support

We will allocate/target our support in four ways

- Local - Neighbouring communities to our sites (where we make, move or manage our products). The intended outcome is support for projects that provide solutions to identified needs.

The value to WE Soda should be outlined but may be no more than goodwill and recognition. The budget will be fixed and come from the site's budget. Each site will fix their own budget.

- Global - Given the global nature of WE Soda, the company, especially when we factor in the customer base, we will support one Global cause over a 3 - 5 year period. The project chosen will need to demonstrate a clear link to one or more of the key strategic priorities of the WE Soda Global Sustainability Plan. There will be a fixed budget for this, from the UK office Sustainability Budget.
- Shared-value – where the successful outcome of the project may directly result in a positive impact, but is not obliged to, on WE Soda's commercial value as well as the various benefits it brings to the organisation being supported. For example - funding scientific research that leads to product development or process enhancement are valid. In this case, the value to the recipient and to us will be transparent. One historical example is the support for a carbon capture technology development project through a WE Soda Sustainability Scholarship at Imperial College, London. These can be located anywhere and budgets may come from various functions.
- Emergency Relief – this will be on a needs basis. This could be site specific, national or global, depending on the nature of the event. These are not budgeted for but managed as and when required.

### 3.2 Themes

WE Soda's projects can be grouped into five main themes

**Water, Nature & Climate Resilience:** Conserve, restore and sustainably manage water resources and natural ecosystems (e.g., community water supply, irrigation schemes, watershed rehabilitation, reforestation, biodiversity). Require an environmental baseline at approval and measurable social & environmental outcomes.

**Gender Equality & Diversity:** Increase women's participation and leadership in community programmes and supply chains; ensure inclusive access and non-discrimination, aligned with UNGC/WEPs. Embed targets, mentoring and safe-working provisions to sustain progress across sites.

**Community Wellbeing:** Committing to enhance the wellbeing of communities neighbouring WE Soda plants by sustaining local livelihoods, improving essential services, and responding to immediate needs through transparent engagement and accountable delivery.

**Education & Skills Development:** Expand vocational training, apprenticeships, scholarships and STEM outreach, build a pipeline from school to employment and improve local employability.

### 3.3 Nature of Support

will be classified into the following categories,

- Financial
- In-kind,
  - o Assets including access to land
  - o Free resources (i.e. water for farmers/agriculture at Eti Soda)
  - o Expertise
  - o Employees' time
- A combination of both. For in-kind, a proxy financial value will be assigned and reported.

### **3.4 Governance**

**3.4.1 Identification** - Projects will be shaped by working within local communities to find what projects emerge as being optimum

**3.4.2 Selection** - Proposal will be written up by the recipient according to the following framework in order to allow full assessment. The proposal will cover.

- Nature, purpose and the duration of the project for which the support is being requested
- The recipient's organisational structure, governance and funding model (money will not go to individuals, or for-profits businesses)
- The requested contribution from WE Soda, time-period, and the value that will bring to society, and suggested value for WE Soda.
- Metrics and milestones to measure success
- Risks and risk mitigations
- How impact will be tracked and measured
- The resilience of the project at the time WE Soda ends its support

#### **3.4.3 Approval –**

- ≤ £5,000 — complete the Community Project (Local) Assessment Template, review and approval by the Site GM.
- £5,001–£50,000 — complete the WE Soda Social Project Assessment Template, review and approval by the Site GM
- £50,000 — complete the Community Project Assessment Template, review and approval Sustainability Committee.

**3.4.4 In-Kind** - support will be dealt with on a case-by-case basis but will be signed off by the Site GM at the very least.

**3.4.5 Digital Tracking:** All community projects must be recorded in the Corporate Community Projects Tracker. The Tracker will store project metadata, theme tags, owner, country, dates, budget, KPIs, SROI estimate, documents and status, and will be used for quarterly and annual reporting.

### **3.5 Sites, Allocation & Resources**

Sites are defined as locations where products are managed, produced, or distributed. Budgeting is left to the discretion of the respective Site General Managers, and resources will be allocated to ensure sufficient capacity and capability across the business to manage these projects.

### **3.6 Health and Safety Governance**

Major projects require formal approval from the Head(s) of Health & Safety (current post-holders to be confirmed) before contractual commitment or start of works. Projects in mining regions or with site-specific risks require sign-off from the local Plant H&S Manager. Project Owners must maintain H&S plans, permits and incident records and report serious incidents immediately to H&S and CSO.

### **3.7 Human Rights & Labour Standards**

All WE Soda projects—and any work delivered on our behalf—must respect human rights and labour standards. Compliance will be verified at project initiation, monitored during delivery and confirmed at closure; breaches must be addressed and reported.

### **3.8 Measuring & Monitoring**

Projects must set KPIs at approval and record the baseline, progress and evidence in the Corporate Community Projects Tracker. After completion, a short evaluation (within 3–6 months) must be uploaded to the Tracker stating whether the objectives were met. Independent checks are recommended for medium/large projects. Tracker data will be extracted quarterly, and outcomes reviewed every six months.

### **4. Training**

All employees undertaking any kind of interaction regarding corporate social activities will be trained on this Policy every two years unless there is change in the Policy.

### **5. How to raise a concern**

We encourage all employees to speak up with concerns that they may have and have a policy of non-retaliation for any issues raised in good faith. Please see our Whistleblowing Policy for more information and details on how to raise any concerns.

### **6. Policy Review and Sanctions**

#### **6.1 Policy Review**

The Policy and its related statements and objectives should be reviewed on an annual basis or, if subject to legislation or other material changes, sooner if required to uphold its accuracy and validity and to reflect the progress against time-bound objectives.

The review will be conducted by the CSO. The review process will consist of the identification of any outdated measures and objectives that are no longer relevant or do not apply, and to amend any procedural information or steps presented within the present policy.



Any exception to the Policy is subject to written approval by CSO.

#### **6.2 Corrective Action**

In the event of non-compliance with this Policy, we reserve the right to take corrective and/or disciplinary action as appropriate.

## WE Soda Social Project Assessment Template - LOCAL STAKEHOLDER TEMPLATE

<b>Project Name:</b>				
<b>Project Description:</b>				
<b>Location:</b>				
<b>Duration:</b>				
<b>Start date:</b>				
<b>Funding Amount Requested for Future:</b>				
<b>Budget Holder:</b>				
<b>Date of Assessment:</b>				
<u>Community perception of the project</u>				
<b>Is this the first time the project is being implemented?</b>	Yes	Ⓚ	No	Ⓚ
<b>Project Category</b>	Basic Needs (Food, heating, clothing)	Ⓚ		
	Infrastructure (Water well, water line)	Ⓚ		
	Agricultural Support (equipment, seeds, animal watering troughs)	Ⓚ		
	Social Area Support (Mosque, village hall improvements)	Ⓚ		
	Other			
<b>Urgency</b>	Emergency	Ⓚ		
	Planned	Ⓚ		
	Routine	Ⓚ		
<b>Target Beneficiaries</b>	No. Households		No. People	

Recurring need (Does this support need repeating (e.g. every winter?))	Yes		No	
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<b>Any additional comments:</b>	
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Evaluating the value of the project to WE Soda

<b>Theme</b>	Water, Nature & Climate Resilience	
	Gender Equality & Diversity	
	Community Wellbeing	
	Education & Skills Development	

<b>Any additional comments:</b>	
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<b>What are the categories of projects that can be outlined in the draft Corporate Social Investment Strategy?</b>	Local	
	Global	
	Emergency Relief	
	Shared-value	

<b>Any additional comments:</b>	
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Defining the Key Performance Indicators

Define KPIs					
KPI Title	What does it measure?	Target value	Unit	Method	Frequency

**Qualitative Assessment**

Has a site visit been conducted?	Yes		No	
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Have the site visit observations been documented by the assessor?	Yes	<input type="radio"/>	No	<input type="radio"/>
Was feedback from the local residents or leaders collected?	Yes	<input type="radio"/>	No	<input type="radio"/>
Does the assessor believe the project delivers meaningful social value beyond the measurable KPIs?	Yes	<input type="radio"/>	No	<input type="radio"/>
Does the project appear contextually appropriate and locally relevant?	Yes	<input type="radio"/>	No	<input type="radio"/>
<b>Any additional comments, for qualitative assessment purposes:</b>				

### Ethics, Health & Safety Compliance

<b>Human Rights &amp; Labour Standards</b>				
Checked for fair and safe working practices (no child or forced labour, non-discrimination, fair pay and hours):	Yes	<input type="radio"/>	No	<input type="radio"/>
<b>Health &amp; Safety Governance</b>				
Responsible H&S person for this project:				
Reviewed and approved by site H&S representative:	Yes	<input type="radio"/>	No	<input type="radio"/>

### Financial Assessment

<b>Cost Overview</b>				
Cost Item	Description	Estimated Amount	Co-funding? (Yes/No)	If yes, by whom?
<b>WE Soda's contribution</b>				
Type of Contribution	Category	Amount	Notes	
<b>Grant / Financial Support</b>	<b>Financial</b>			
<b>Volunteer Time (hours)</b>	<b>In-kind</b>			

<b>Equipment / Materials</b>	<b>In-kind</b>		
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