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## Eti Soda Inc. Anti-Slavery and Human Trafficking Policy

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### Purpose of the Policy

Modern slavery is a fundamental violation of human rights and must be struggled globally. The modern slavery term includes slavery, servitude, forced and compulsory labor, bonded labor, child labor, and human trafficking crimes. Although these crimes seem similar, they are legally different from each other.

**Slavery:** Having to work without an affordable payment or appreciation.

**Servitude:** The state of being a slave or being completely subordinate to someone stronger.

**Forced and compulsory labor:** Any work or service in which a person is compelled under the threat of punishment and without the full will of that person.

**Bonded labor:** The payment of debts not in money but directly by labor and production power.

**Child labor:** The work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

**Human trafficking:** The illegal transport of individuals by force or deception for the workforce or activities that benefit others financially.

This policy demonstrates Eti Soda Inc.'s commitment and approach to fighting against modern slavery.

### Policy Statement

- This policy applies to all level members of staff working at Eti Soda Inc.
- As Eti Soda Inc., we have a zero-tolerance approach to modern slavery and human trafficking in our operations and supply chain. We are committed to developing, implementing, and controlling systems that aim to ensure that modern slavery does not occur in any area of our organization or at any stage of our supply chain.
- Responsibilities of employees within our company:
  - Working in coordination with the company in fighting against modern slavery and human trafficking,
  - Being alert to the risks of modern slavery and human trafficking in our operations and at any stage of our supply chain,
  - To report the crimes detected within the scope of modern slavery and human trafficking in our operations and at any stage of our supply chain to the relevant authorities as soon as possible,
  - Not being linked to any crime or issue related to modern slavery and human trafficking inside and outside the company that could damage the company's reputation.
- Our company expects from every company in its supply chain to comply with the requirements of this policy in their businesses and their supply chains.
- Our company will carry out due diligence, periodically evaluate the risks and ensure that the necessary measures are taken about modern slavery and human trafficking issues in the company and its supply chain,

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- Our company will include modern slavery/behavior clauses in all supplier contracts until the end of 2021.
- It is ensured through audits that modern slavery and human trafficking crimes are not committed within the company.
- Until the end of 2021, it will be ensured through audits that modern slavery and human trafficking crimes are not committed within the supply chain.
- In our operations and supply chain, we act with the principle of transparency in our fight against modern slavery and human trafficking.
- Our company provides safe and fair working conditions for all workers and against child labor in the Labor Law and the side of the Republic of Turkey as the International Labor Organization (ILO) is to comply with the agreement. It is observed that the companies in our supply chain comply with the legal regulations applicable in their countries.

#### **Responsibilities**

- The Company's Board of Directors has general responsibility for this policy, including ensuring compliance with legal and ethical obligations.
- The Quality Assurance & Quality Control Department is primarily responsible for the implementation of the policy actively, including monitoring the effectiveness of the policy and ensuring that all staff knows, understand, and comply with the policy.
- All staff is responsible for following the policy.
- The Quality Assurance & Quality Control Department will welcome any questions, comments, or suggestions about this policy.

#### **Application of the Policy**

- Everyone working on behalf of the company in any capacity, including employees at all levels, interns, contractors, third-party representatives, and suppliers, must read, understand, and apply this policy.
- The prevention, detection, and reporting of modern slavery in any part of the company's operations and supply chain is the responsibility of everyone working. Employees working on behalf of the company are required to avoid any activity that may violate this policy.
- In cases where there is a conflict with this Policy or it is believed or suspected to be in the future, the Quality Assurance & Quality Control Department should be informed as soon as possible.
- In case of any risk, violation, or concern about modern slavery or human trafficking should be reported to etik@etisoda.com. Our company also has a Whistleblowing Policy and Procedure.

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### Training

- Eti Soda Inc. ensures that all its employees receive the necessary training to comply with these policies and procedures, to recognize and avoid crimes within the scope of modern slavery.
- Our company expects companies in its supply chain to provide training to their employees within this scope.

### Breaches of the Policy

- In the case of any Eti Soda Inc. employee is involved in modern slavery and human trafficking and breaches this policy, necessary disciplinary procedures will be applied with the principle of zero tolerance.
- In cases where modern slavery and human trafficking crime is detected in company operations;
  - The responsible person is determined and disciplinary procedures are applied.
  - Corrective action is taken as soon as possible to end the situation and protect the victim,
  - The effectiveness of the measures taken is monitored.
- If a crime against modern slavery and human trafficking is detected in a company in the supply chain;
  - The company is expected to act transparently and provide the information requested by our company,
  - Corrective action is expected as soon as possible to end the situation and protect the victim,
  - It is expected to monitor the effectiveness of the measures taken,
  - A report is expected to be submitted to our company regarding all steps taken,
  - Depending on the content of the contract signed with the firm, the relationship can be terminated, suspended or the business volume can be reduced.

### Revision

This policy will be reviewed annually by the Board of Directors of Eti Soda Inc. concurrent with the Modern Slavery Statement.

**General Manager**

**05/10/2020**