

ETİ SODA SUSTAINABILITY REPORT

2021

A never ending
sustainability journey

ETİ SODA 

An aerial photograph of a dense, lush green forest. A narrow, light-colored dirt or gravel road winds through the center of the forest. A small white car is visible on the road, positioned in the lower-middle section of the frame. The trees are tall and closely packed, creating a thick canopy of green. The lighting is soft, suggesting an overcast day or late afternoon/early morning.

ETİ SODA SUSTAINABILITY REPORT 2021

A never ending
sustainability journey

ETİ SODA 

CONTENTS

4	MESSAGES FROM THE EXECUTIVES	52	DIGITALISATION
8	ABOUT ETI SODA	56	ENVIRONMENTAL MANAGEMENT
14	CORPORATE GOVERNANCE	70	OPERATIONS
38	PRODUCT QUALITY AND SAFETY	76	WORK LIFE
42	CUSTOMER RELATIONS	86	SOCIAL INVESTMENTS
48	INNOVATION	92	APPENDICES

ABOUT ETI SODA

We are publishing the third Eti Soda Sustainability Report in order to present our approach in managing the value and impact we create with our activities, our sustainability priorities, our activities and performance results in support of United Nations (UN) Sustainable Development Goals.

This report was prepared in accordance with GRI Standards: Core Option. The material issues that form the basis of the report were obtained as a result of the processes carried out in accordance with the reporting principles specified in the GRI Standards. The scope of the report consists of the activities carried out by Eti Soda Üretim Pazarlama Nak. ve Elektrik Üretim San. ve Tic. A.Ş. (Eti Soda) for the year ending 31 December 2021.

Feel free to send us all your opinions and suggestions regarding our sustainability activities and reporting studies via sustainability@etisoda.com.

MESSAGE FROM THE CHIEF EXECUTIVE OFFICER



Alasdair WARREN
CEO / WE Soda

**We are very proud that
Eti Soda's carbon footprint
is half the benchmark
target determined by the
European Union.**

Dear stakeholders,

Improving our Environmental, Social and Governance ("ESG") performance is one of our corporate goals and we believe that the integration of ESG best practices into our everyday operations is fundamental to the continued and future success of our business, makes sound business sense and adds intrinsic value for our stakeholders.

We are committed to further improving our ESG performance and we have developed a vision for our business to help us achieve this goal. The three

key components of this framework and vision focus on compliance, leadership and transformation. Through compliance, the Group meets its regulatory requirements and also looks to fulfil industry standards in areas such as product quality, environmental performance, health and safety, supply chain sustainability and responsible procurement, ethical business conduct and in its selling practices. Through leadership, the Group aims to lead the industry through best practices in key areas such as emissions, water usage and waste, inclusive recruiting and employment, creating high quality local job opportunities and active community engagement. We aim to ensure that our workplaces are safe, inclusive and rewarding, allowing employees and contractors to perform at their best whilst prioritising their safety and creating a workplace that promotes equality, diversity, inclusion, health and wellbeing.

In 2021, we continued to feel the effects of Covid-19 which was further compounded by the emerging energy crisis and global economic uncertainties. With this backdrop, Eti Soda continued to perform well and in line with expectations; increasing production volume and sales, despite the market headwinds. This achievement is underpinned by our continuing focus on creating social, economic, and environmental value for the Company and our stakeholder base.

Climate change and its negative effects have become an existential threat to our world, as a Group, all our emission targets have been checked with the Science Based Targets Initiative's ("SBTi") target-setting tool and our emission targets are all aligned with a "well-below 2°C" global warming outcome. We have the objective to further reduce our emissions, so that our emissions reduction pathway will be consistent with a "below 1.5°C" global warming outcome.

In 2020, Eti Soda renewed its Environmental Product Declaration ("EPD") which is an

independently verified and registered document that communicates transparent and comparable information about the life-cycle environmental impact of products. Eti Soda is the first and so far the only Soda Ash and Sodium Bicarbonate products worldwide. In 2021, we continued to implement practices that will further reduce our environmental impact and as an important result of the technology we use and our focus on sustainably operating our facility, we are very proud that Eti Soda's carbon footprint is half the benchmark target determined by the European Union; we see this as a key business and operational differentiator.

In addition to the focus on our environmental impact, we have always recognised the importance of continuously improving and managing our relations with the communities in which we operate and we aim to have a positive impact on these communities. In this regard, Eti Soda management and employees regularly meet with their local communities, on a formal and informal basis, to discuss any issues or complaints and how best to work together for the benefit of local communities as a whole and through our well received and regular engagement. In 2021, we continued to support the local people and communities in which we operate with the development of special projects promoting arts, culture and history as well as infrastructure and construction.

We are proud of what we have already achieved and our leadership position within our industry. Notwithstanding this, we continue to strive for even better performance and have set ourselves challenging targets in the years ahead, further improving our performance and practices in all areas. I would like to thank all of our stakeholders who contributed to our ongoing success at Eti Soda and for their continuing support.

MESSAGE FROM THE GENERAL MANAGER



Mustafa Tanzer ERGÜL
Member of the Board of Directors and
General Manager/Eti Soda

**We improved our
Ecovadis rating from
“Silver Medal” in 2020
to “Gold Medal “ in 2021.**

Dear stakeholders,

2021 was as a demanding period as our operations at Eti Soda adapted to the ongoing Covid-19 pandemic, whilst at the same time continuing to capitalise on the sustainable business practices which provide us with our unique competitive advantage over other Soda Ash producers. Operationally, Eti Soda continued to perform well, producing 1.95 million tonnes of Soda Ash and Sodium Bicarbonate, delivering a 37% increase in revenues compared to the previous year and with an export rate of 72%.

Alongside the strong operating performance, Eti Soda maintained a continuing strict focus on environmental, social and governance performance. During 2021, ISO 26000 Social Responsibility Management System and Anti-Corruption Management System Certificates were awarded, which when taken alongside the upgraded Ecovadis Gold Medal also awarded in 2021, clearly shows a momentum in ESG performance to match that of the physical operations.

In 2021, we also carried out important environmental sustainability studies; firstly, we committed to take the necessary steps to reduce our emissions further and set new targets in accordance with the requirements of the Paris Agreement and as a signatory to the CEO Water Mandate, an undertaking of UN Global Compact (“UNGC”), we started reporting our water management performance, as well as supporting global water protection policies.

Eti Soda was awarded the above sector average of A-, for climate change and A for water security under the Carbon Disclosure Project (“CDP”) in 2021, an independent non-profit organisation that communicates information about the life-cycle environmental impact of products and processes for more than 13,000 companies worldwide. We also carried out corporate carbon footprint and corporate water footprint calculation and verification studies, in accordance with ISO 14064 and ISO 14046.

We also continued our focus on the social and economic development of the local community in the Ankara Beypazarı region, where we operate. We provided financial support of approximately TL 3 million (USD 162 thousand) for social responsibility and infrastructure projects in the Beypazarı district, sponsoring cultural festivals, as well as donating to multiple societies that support local communities. We have also undertaken several projects focusing on assisting agriculture, which is an important source of livelihood for local communities

Specifically in regards to social engagement; the Eti Soda Special Educational Practice School in Beypazarı, continues to thrive, supporting equal access education for children with special educational needs, living not only in Beypazarı, but also in different districts of Ankara. Importantly work has also continued in 2021, in supporting the empowerment of women, where we continued our efforts to improve women's participation in the workforce and the economy and increase the female employment rate.

I am pleased to present our third sustainability report to you and I would like to thank all our stakeholders, especially our valuable colleagues, who contributed to our sustainability efforts.

102-2;102-4;102-5;102-6;102-7

ABOUT ETI SODA

Eti Soda was established in 1998 by the Ciner Group, following the discovery (in 1979) of a trona ore deposit in the Beypazarı district of the Ankara province, Turkey. Eti Soda, 74% owned by Ciner Group and 26% by Eti Maden İşletmeleri A.Ş., is one of Turkey's most successful public-private partnerships.

Eti Soda uses solution extraction rather than traditional mining methods to retrieve the trona ore to surface. Solution extraction is a safer,

more energy and water efficient, lower cost and more environmentally friendly extraction process, compared to conventional underground mining techniques. Eti Soda is not only the first natural Soda Ash and Sodium Bicarbonate producer in Europe, but it is also the first facility in the world to produce commercial-scale Soda Ash and Sodium Bicarbonate using solution extraction technology.

Eti Soda, which started commercial operations in 2009 with an initial investment of USD 700 million,

increased its production capacity in 2017, to now produce 1.95 million tonnes of Soda Ash and Sodium Bicarbonate per annum.

Eti Soda, is one of the largest chemical exporters in Turkey, meeting the needs of many sectors from glass production to baking powder and exports its products all over the world, with its globally integrated logistics and supply chain network.



VISION, MISSION AND STRATEGY

OUR VISION



Our vision is to remain a world leader in the production of natural Soda Ash by further raising the standard of our products and services, ensuring consistent growth in sodium carbonate and Sodium Bicarbonate production, through sustainable development.

OUR MISSION



Our mission is to bring our high quality and natural products to the market by using an environment and people-oriented approach with a dynamic, productive and innovative team; being aware of our social responsibility at all times.

OUR STRATEGY



Our strategy is to create a positive impact for our employees, customers and the communities in which we operate, while maintaining and improving our leadership position in product quality, reliable supply chain, innovation, occupational safety and environmental standards.

ETI SODA AT A GLANCE

Europe's first **natural Soda Ash** and **Sodium Bicarbonate** producer

Annual turnover over TL
3 billion (USD 161 million)

215,000 tonnes
of Sodium Bicarbonate
production per annum

1.735 million tonnes
of Soda Ash production per
annum

8 km²
mining and production area

20 years
of workable trona reserve

Export to more than
70 countries

72%
export rate

The first facility in the world to use innovative
solution extraction technology

World's first EPD certification
for Soda Ash and Sodium Bicarbonate

593 employees

Around
17,000
person*hour training

22.04% ratio of
recycled water reused

More than 15%
energy supply
from own cogeneration
plant

Soda Ash (sodium carbonate) and Sodium Bicarbonate production

Soda Ash (chemically known as sodium carbonate or Na CO_3) is the tenth most used inorganic compound in the world. It is an alkali salt that is highly soluble in water and its aqueous solution is clear and colourless. Soda Ash is a simple, safe, inorganic raw material which is an essential component in a variety of industrial processes, with no economically feasible and environmentally viable substitute, including the manufacture of glass (which accounts for over 50% of global Soda Ash demand), powdered soaps and detergents and in various chemical processes, including the production of lithium carbonate used in lithium-ion batteries.

Soda Ash can be produced by processing naturally occurring trona ore (so-called “natural Soda Ash”) or via synthetic production processes, referred to as the Solvay and Hou processes (so-called “synthetic Soda Ash”). Natural Soda Ash and synthetic Soda Ash are chemically identical but the production of natural Soda Ash is more environmentally friendly, with Scope 1 and 2 CO_2 emissions of between 0.37 and 0.76 mt of CO_2 per mt of natural Soda Ash production by comparison with a range between 0.96 and 1.38 mt of CO_2 per mt of Soda Ash for Solvay-process based synthetic production.

At Eti Soda, Soda Ash and Sodium Bicarbonate are only produced naturally, from trona ore. In order to extract trona ore, we use innovative solution extraction technology. With this method, used by Eti Soda for the first time in the world; pressurised, heated, low-concentration brine is injected into the subsurface ore body, which dissolves the trona into a more concentrated brine solution that is then extracted to the surface before being pumped to a central facility and processed to produce Soda Ash and Sodium Bicarbonate. We hold a number of patents associated with different elements of our production process at both Eti Soda and. As well as being environmentally better, this closed loop system is safer as there are no underground operatives.

AREAS OF USAGE

Soda Ash

- Glass Industry
- Soap and Detergent Industry
- Textile Industry
- Chemical Industry
- Paper Industry
- Water and Wastewater Treatment
- Flue Gas Treatment
- Other Industrial Applications (e.g. lithium carbonate)

Sodium Bicarbonate

- Food Additive (Baking powder, drinks)
- Feed Ingredient (Stomach acid regulator)
- Personal Care Products
- Cleaning Products
- Chemical Industry
- Pharmaceutical Industry
- Textile Industry
- Paper Industry
- Leather Industry
- Water and Wastewater Treatment
- Flue Gas Treatment





CORPORATE GOVERNANCE

102-18;102-19

At Eti Soda, we are committed to operating sustainably in an environmentally and socially responsible way, with strong corporate governance. We aim to further strengthen our position as a leading producer of Soda Ash and Sodium Bicarbonate with the lowest production cost position globally, while continuing to expand our production capacity and ensuring the long-term sustainability of our operations. We pride ourselves on our safety record in terms of incident rates and workplace injuries. We maintain a rigorous safety programme, which includes continuous training, site audits and hazard identification.

We are proud to have been given third party assurance on our corporate governance structure with various certificates in the fields of quality, environment, occupational health and safety, energy, food and feed safety, information security, social compliance and laboratory accreditation; and we regularly monitor our targets and performance.

In 2020, Eti Soda became a signatory to the UN Global Compact and taking the principles as a basis for supporting human rights, eliminating forced and child labor, promoting environmentally friendly technologies and fighting corruption.

BOARD OF DIRECTORS AND ORGANISATIONAL STRUCTURE

Eti Soda as a subsidiary operating entity to our parent company WE Soda Ltd has a Board of Directors, consisting of eight people, including the Chairperson, the Vice Chairperson and six members.

Primary organisational units are Mine Planning, Mine Production, Soda Ash and Sodium Bicarbonate Production, Energy Production, Packaging and Logistics Management and Water Supply-Treatment. The supporting departments are Quality Control, Management Systems, Customer Relations, Sustainability, Supply Chain and Sales Marketing.

BOARD STRUCTURE

Gürsel USTA
Chairperson

Ali Coşkun DUYAK
Vice Chairperson

Ömer ÇATAL
Member of the Board of Directors

Cevdet ÖZÇEVİK
Member of the Board of Directors

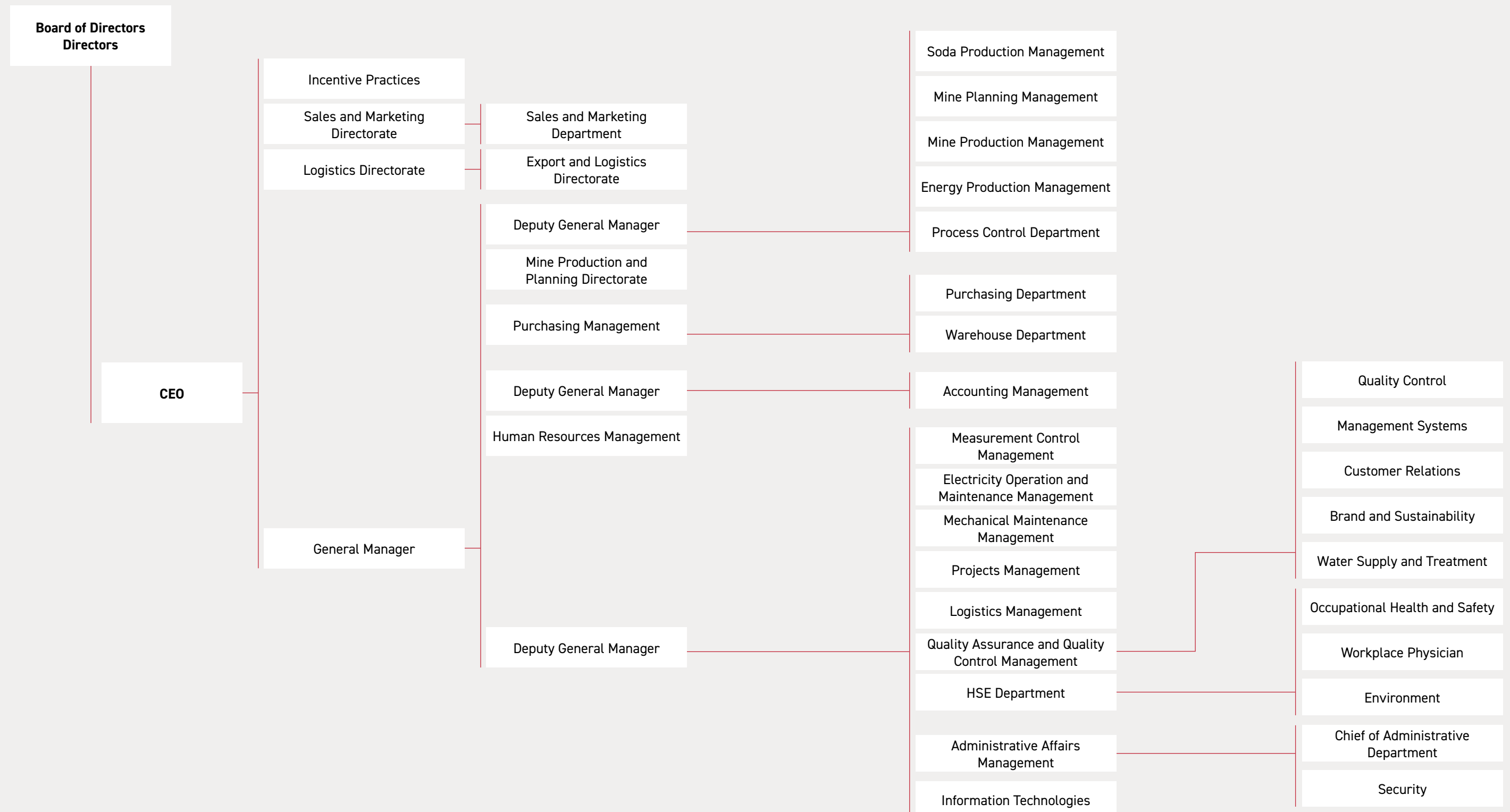
Selçuk YEŞİLTAŞ
Member of the Board of Directors

Mustafa Tanzer ERGÜL
Member of the Board of Directors / General Manager

Mehmet TUNTAŞ
Member of the Board of Directors

Suat İNCE
Member of the Board of Directors

ORGANISATIONAL CHART



102-11;102-15;102-29;102-30;102-31

RISK MANAGEMENT

At Eti Soda, we ensure financial and operational integrity by promptly implementing actions and measures aimed at complementing effective risk management and early risk detection. Through our Risk and Opportunity Identification Procedure, we have created a Risk Committee and associated documentation, which facilitates the necessary analysis in accordance with international standards.

The risk management matrix is developed and approved by the Risk Committee. Risk maps

are reviewed annually and updated periodically. Accordingly, the risk assessments of five units were renewed in 2021. Action plans were created for the risks identified as a result of the evaluation, in order of importance.

In addition to financial risks, social, environmental and ethical risks are also included in the definition of risk. Risks in the field of sustainability are also evaluated by the Sustainability Committee.

Every process which carries reputational risks, are evaluated meticulously:

- › Climate change - we use the scenarios in national and international publications (for example the World Resource Institute - water risk atlas tool) and evaluate the financial impacts based on these scenarios. In this context in 2021, we prepared CDP Climate Change and Water Security reports.
- › Information security - risks are handled in compliance with the ISO 27001 Information Security Management System and within the framework of the Eti Soda A.Ş. Information Security Policy and Information Security Risk Analysis Document.



While determining the risks of climate change, we use the scenarios in national and international publications and we report on CDP Climate Change and Water Security.

ENVIRONMENTAL	Risks	Climate change and drought	Water Scarcity Security	Waste	Loss of Biodiversity	Energy Source				
	Opportunities	Product with Low Emission Intensity	Science Based Emission Reduction Target Commitment	Energy Efficiency Practices	Solution Extraction Technology	Using Alternative Energy Resources	New Sustainability Practices	High Environmental Performance with High Grade Purity		
SOCIAL	Risks	Poor Relationship with Local Communities	Negative Impact On Employee Health	Low % of Female Employees	Value Chain Non-Compliance					
	Opportunities	Ensuring High Product Safety and Quality	Employee Loyalty and Satisfaction	Sector Leading Sustainability Culture	Social Compliance Audits	Compliance Certificates	Local Employment Opportunity			
ECONOMIC & GOVERNANCE	Risks	Exchange Rate Fluctuations	Anti-Corruption	Loss of Reputation	Compliance with Law	Production Loss	Economic Crisis	Global Fluctuations In The Energy Supply		
	Opportunities	Increase In Demand for Environmentally Friendly Products	Increase In The Use of Flat Glass	Fair Competition In The Soda Industry	Wide Export Network	Current Government Incentives	High Production Quality	Competitive Production Cost	Internal Sustainability Governance System	Product with Low Emission Intensity

INTERNAL AUDIT AND CONTROL

At Eti Soda, regular internal audits are carried, to ensure the effective implementation of all management systems and continuity. The scope of internal audit processes includes quality, food and feed safety, environment, occupational health and safety, and social compliance (business ethics, anti-corruption, etc.). Accounting, Procurement and Human Resources departments are specifically audited for bribery and corruption. In 2021, 27 internal audits were carried out for 22 different processes.

A recommendation form was integrated into the internal audit reporting process. We collect individual suggestions and ensure continuous improvement. In addition, we published a new internal audit questionnaire to outline the Social Compliance requirements and implemented the Social Compliance internal audit study.

Due to the pandemic and the decrease in the number of internal auditors in 2021, we experienced problems in undertaking some internal audit activities. Therefore, we aim to increase integrated internal audit training in 2022, as the effects of the pandemic are diminishing.

In addition to internal audits, we are audited by independent organisations and our customers, in line with our management system requirements. As a result, 27 external audits were completed in 2021. As a consequence of all external audits, six minor non-conformities were identified and corrective actions were taken.

BUSINESS ETHICS AND ANTI-CORRUPTION

As a member of SEDEX, one of the world's leading platforms designed to help companies manage and improve working conditions in their global supply chains, we work to improve the understanding of corporate ethics amongst our suppliers and subcontractors.

We developed the Eti Soda Business Code of Conduct, which covers all business processes, and codes of conduct for working life, modern slavery and human trafficking, external stakeholder human rights, anti-bribery and corruption, money laundering, gifts and hosting, information security, non-governmental organisations or political activities.

We created the Code of Business Ethics to guide our employees. With annual training, all employees are informed about the Code of Business Ethics and 551 person*hours training was delivered in 2021. In addition, we created the Code of Business Ethics for Suppliers who were asked to sign the Code of Ethics Contract in 2021 and we aim to increase the number of suppliers signing this contract in 2022.

We established an Ethics Committee with the aim of investigating complaints and violations of the Code of Business Ethics and evaluating and resolving any such occurrences. In addition, within the scope of the Whistleblowing Policy, there is an Eti Soda Ethics Hotline for reporting concerns about behaviour with is deemed unethical. The hotline is accessible to all our stakeholders.



102-17

No personal information is requested and all information provided is kept confidential. Any employee who uses the Ethics Hotline to report their concerns, remains anonymous to protect them from any kind of retaliatory behaviour as a result of their whistleblowing. All reported violations are evaluated transparently by the Ethics Committee and necessary actions are taken.

Eti Soda has a particular focus in the fight against modern slavery and human trafficking. In this regard, in 2020, the Eti Soda Anti-Slavery and Human Trafficking Policy was established and a Modern Slavery and Human Trafficking Compliance Manager was appointed. The role was created to review and improve the Policy and to report to the Board of Directors. In addition, Anti-Slavery and Human Trafficking training was given to all employees.

Anti-corruption activities are managed in line with the framework of our ISO 37001 Anti-Bribery and Corruption Management System. The Anti-Corruption and Compliance Administrator was appointed to develop the related management system, fulfill the requirements, ensure coordination with the members of the Ethics Committee and to report the performance of the anti-bribery management system to the Board of Directors. Annual reporting is made by the Quality Assurance Department within the scope of Anti-Corruption and Compliance. In addition, we carry out third-party audits covering the Management System standard.

In 2021, there were no violations of the Code of Business Ethics and no cases of corruption.

[Click here](#) for the Eti Soda A.Ş. Anti-Slavery and Human Trafficking Policy, Anti-Bribery and Corruption Policy, Supplier Code of Conduct and Whistleblowing Policy.



Eti Soda Ethics Hotline:
etik@etisoda.com

[Click here](#) for the Eti Soda
Business Code of Conduct.



MEMBERSHIPS AND SUPPORTED INITIATIVES

Ankara Chamber of Commerce
(ATO)Beypazarı Chamber of Commerce
(BTO)İstanbul Minerals and Metals
Exporters' Association (İMMİB)Science Based Targets Initiative
(SBTi)

UN Global Compact



CDP

Central Anatolian Exporters'
Association (OAİB)İstanbul Chamber of Commerce
(İTO)European Chemical Industry
Council (CEFIC)

CEO Water Mandate



SEDEX



Turkish Statistical Institute (TÜİK)



Ecovadis



EPD Turkey

Central Bank of the Republic of
Turkey (TCMB)National Mining Development
Foundation (YMGV)European Soda Ash Producers
Association (ESaPa)İstanbul Chemicals and Products Exporters'
Association (İKMİB)

SUSTAINABILITY MANAGEMENT

Sustainability is an important part of our business culture and strategy. One of our main goals is to implement our sustainable business model through our value chain. As such in line with the United Nations Sustainable Development Goals, we aim to keep our environmental impact at minimum levels, to ensure the continuity of a fair and equitable workplace and to continuously improve our

sustainability performance, with the support of our stakeholders.

The Sustainability Committee is responsible for making decisions on environmental, social and governance issues with the approval of the Chairperson of the Sustainability Committee/ General Manager; who reports directly to the Chairperson of the Board of Directors.

The role of the Chairperson in the assessment of the economic, environmental and social impact of risk management processes is assured by the Deputy Chairperson of the Sustainability Committee/Vice President of the Sustainability Committee, who is also the Leader of the Risk Committee.

In accordance with sustainability principles and policies, the Sustainability Committee was established in 2017, to set short, medium and long-term sustainability goals, implement procedure

and to ensure their continuity. The Sustainability Committee holds regular meetings in which all risk issues are discussed and addressed. Sustainability policy and objectives, integrated management system performance evaluations and resources required for continuous improvement are the responsibility of committee members.

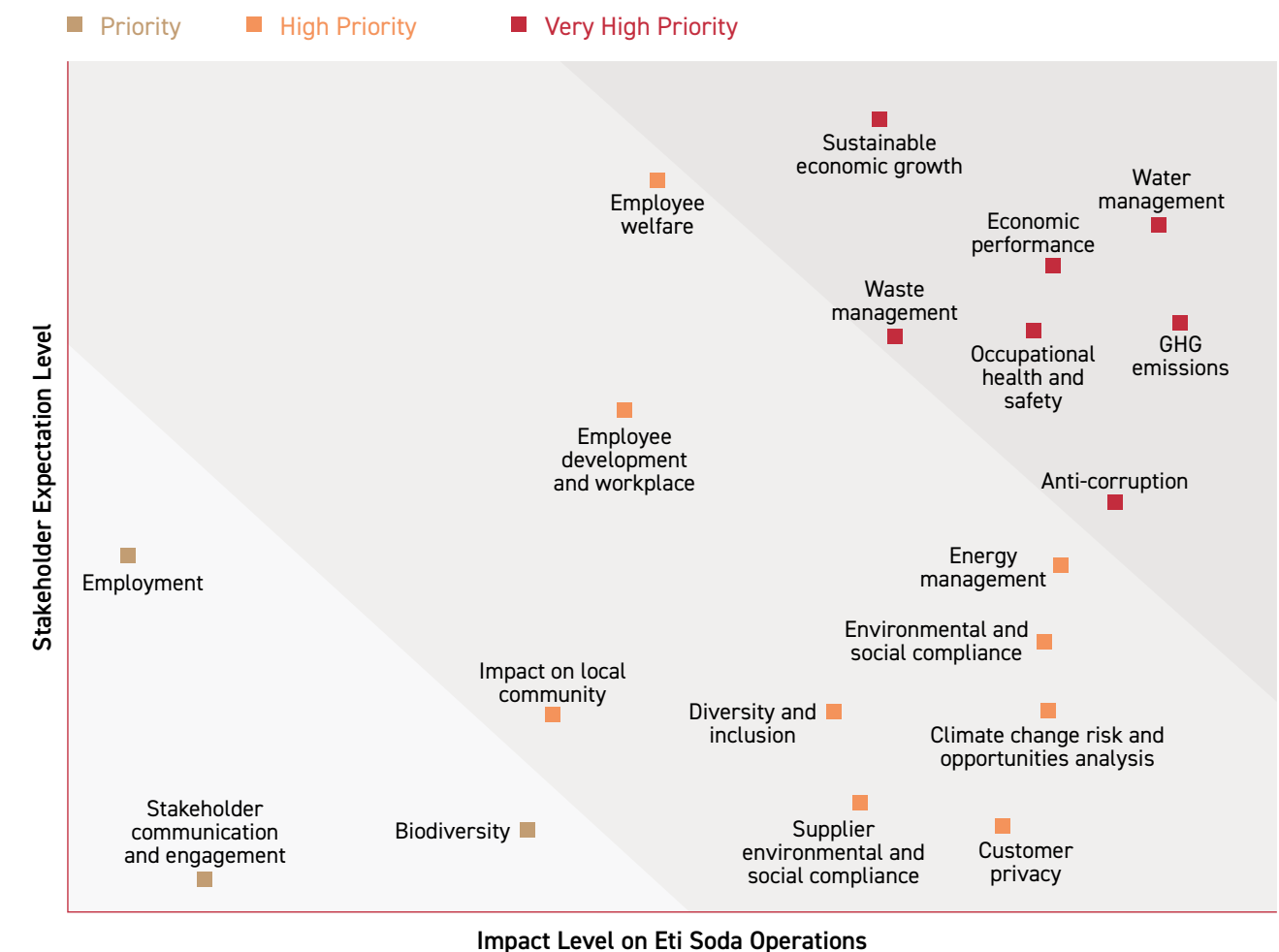
[Click here](#) for the Eti Soda A.Ş. Sustainability Policy.



Sustainability Management Structure at Eti Soda

Sustainability Committee	Ethics Board	Stakeholder Relations Board	Risk Committee	Board of Discipline	Supreme Disciplinary Board
General Manager (Lead)	Deputy General Manager (Lead)	Deputy General Manager (Lead)	Deputy General Manager (Lead)	Deputy General Manager (Lead)	General Manager (Lead)
Deputy General Manager (Deputy)	Deputy General Manager (Deputy)	Administrative Affairs Manager	Health, Safety and Environment Manager	Human Resources Manager	Deputy General Manager
Quality Assurance and Quality Control Manager	Mine Planning Manager	Accounting Manager	Quality Assurance and Quality Control Manager	Accounting Manager	Deputy General Manager
Health, Safety and Environment Manager	Health, Safety and Environment Manager		Management Systems Supervisor	Employee Representative	Deputy General Manager
Brand & Sustainability Supervisor	Administrative Affairs Manager				Employee Representative
Customer Relations Supervisor	Quality Assurance and Quality Control Manager				
Management Systems Supervisor					
Environmental Engineer					
Water Supply & Treatment Supervisor					

In 2021, we reviewed our material issues, which we created by taking the opinions of our internal and external stakeholders in the previous evaluation period. Our material issues, which were updated after we assessed the effects of Eti Soda operations and the decision-making processes of our stakeholders, are as follows:



SUSTAINABILITY MILESTONES

Trona ore deposits were found in Ankara's Beypazarı district during coal drillings conducted by MTA (the General Directorate of Mineral Research and Exploration).

1979



1985

1979-1985 trona mine reserve studies continued.



Eti Soda A.Ş. was established.

1998



2003

Pilot plant works started.



Soda production facilities and power plant installation started.

2007



2009

First commercial production took place. Quality Management Systems studies started.



ISO 9001 Quality Management System and ISO 22000 Food Safety Management System Certificates were obtained. FEMAS product certification work has been completed.

2010



2011



Production volume reached 1.1 million tonnes. ISO 14001 Environmental Management System, OHSAS 18001 Occupational Health and Safety Management System Certificates were obtained. ISO/IEC 17025 test accreditation certification work has been completed.

Received the BRC (British Retail Consortium), Kosher, and Halal Food product certifications.

2012



2013



Eti Soda submitted information to the SEDEX, Ecovadis, and CDP reviews.

Codes of Ethics were created and the first SEDEX Social Compliance audit was conducted.

2014



2015



Work started on the capacity increase. We obtained GIMDES (Association for the Inspection and Certification of Food and Supplies) Halal product certification.

Production volume reached 1.7 million tonnes. Life Cycle Assessment ("LCA") study was done and verified and the EPD was published. Eti Soda Sustainability Committee was established. Long-term strategic goals regarding sustainability were developed. The first Eti Soda Sustainability Report was published.

2017



2018



Corporate carbon and water footprint calculation and verification studies were carried out. GMP+ (Good Manufacturing Practices) certification was completed.

First Eti Soda Sustainability Report was published. Eti Soda became a global leader with an A rating in the CDP Water Safety Programme.

2019



2020



ISO 14064 Greenhouse Gas and ISO 14046 Water Footprint calculation and verification studies were completed. LCA study and EPD document were renewed. Transition to ISO 45001 Occupational Health and Safety Management System was achieved. Eti Soda became a signatory to the UN Global Compact. Eti Soda became the leader of Turkey with an A- rating in the CDP Water Safety Programme.

2021







A commitment to SBTi was made and we became a signatory to the CEO Water Mandate. The second Eti Soda Sustainability Report was published. ISO 26000 Social Responsibility Management System and ISO 37001 Anti-Bribery and Corruption Management System certification studies were completed. The Code of Ethics for Suppliers was created. The first Anti-Slavery and Human Trafficking audit was conducted. Eti Soda was rated with a Gold Medal on the Ecovadis platform. We became the leader in Turkey with an A- rating in the CDP Climate Change Programme and have a global leadership position with an A rating in the Water Security Programme.















Our Commitments

- ▣ To identify and evaluate issues that affect our economic, social, and environmental sustainability.
- ▣ To identify, measure, monitor and improve all materiality issues for Eti Soda, and its stakeholders.
- ▣ To adopt a system of transparency, accountability, trust, and ethics in our business.
- ▣ To ensure that all relevant process owners embrace all priority issues and act to make progress.
- ▣ To shape and guide strategic objectives according to the needs, concerns, and interests of stakeholders.
- ▣ To address sustainability issues throughout the supply chain to the best of our ability.
- ▣ To extend our positive impact for all stakeholders in the local community.
- ▣ To set and achieve sustainability goals for Eti Soda and contribute to the WE Soda Ltd goals.
- ▣ To set and achieve sustainability goals for Eti Soda and contribute to the Global Development Goals and WE Soda Ltd goals.



STRATEGIC GOALS OF ETİ SODA

SDGs	Goal	Target	Actual vs 2021 Target
   	Continuity of Production	Procurement of raw material required for production	37%
  	Sustainable Brand	Raising the brand value	100% completed.
  	Sustainable Market Network	Finding new markets for future production volume increases	86%
       	Combating Water Scarcity	<p>Keeping the amount of recycled water between 20-25%</p> <p>Keeping the discharged water amount between 15-20%</p>	<p>100% completed.</p> <p>46%</p>
 	Effective Use of Natural Resources	Reduction of raw solution/tonne product density by 8% (Base Year: 2020 Target Year: 2025)	New target

SDGs	Goal	Target	Actual vs 2021 Target
		50% reduction in emission intensity (Base year 2012: 0.648 tCO ₂ e - Target year 2025: 0.324 tCO ₂ e)	92%
		Reduce Scope 1 & 2 Absolute Emissions by 29.4% to 480,317 mt CO ₂ e (Base Year: 2021 Target Year: 2028 Target Motivation: Compatible with 1.5°C)	New target
		Scope 1,2 & 3 reduction of absolute emissions to net zero and investment in permanent decarbonisation projects for residual emissions (Base Year: 2021 Target Year: 2050 Target Motivation: Net Zero compliant)	New target
      	Emission Reduction and Energy Efficiency	<p>Reducing Scope 1 & 2 emissions intensity by at least 90% and investing in permanent decarbonisation projects for residual emissions (Base Year: 2012 Target Year: 2050)</p> <p>Reducing the absolute emission amount of Scope 3 by 15% (Base Year: 2021 Target Year: 2027)</p> <p>Investing in afforestation activities</p> <p>Transition to renewable energy sources (2 Mega-watt ("MW") SPP Project)</p> <p>Transition to renewable energy sources (6 MW Floating SPP Project)</p> <p>Recovery of waste condensate/steam (Greenhouse project-driven activity)</p>	<p>New target</p> <p>New target</p> <p>93%</p> <p>30%</p> <p>New target</p> <p>100% completed.</p>
      	Increasing Awareness on Supply Chain	<p>Practice on risk analysis to 100% of our approved suppliers</p> <p>Developing a Supplier Portal</p>	<p>New target</p> <p>60%</p>

STAKEHOLDER ENGAGEMENT

An important element in improving our sustainability performance is the feedback from our stakeholders. We actively use dialogue platforms which can receive feedback from our stakeholders in an effective and efficient manner. We gather opinions and feedback regarding our sustainability performance and then we convey the opinions on environmental, social and governance issues to the Eti Soda Board.

In 2021, we collected feedback from our customers, suppliers, local people, and sectoral organisations in order to influence our sustainability priorities. The key issues highlighted by our stakeholders were amongst others energy efficiency, economic performance, water use, climate change, emissions, and customer priorities.

The opinions of local communities directly affected by our activities are of particular importance to us. We also took the opinions of the representatives from the villages around us, kept in touch with them and subsequently hosted them at our facility. We talked to neighbourhood representatives (mukhtars) about our sustainability efforts and asked them about their priorities for the villages they represent. As a result of the survey, we found out that the people around us mostly had questions about the impact of our facility's processes on themselves and their living spaces.

Therefore, we conducted a more focused study on the direct impact of our activities on local people. The result of this study shows that our stakeholders mostly care about the success and efficiency of our water management systems, the impact of our activities on local air pollution and greenhouse gas emissions, and the occupational safety of the local people working at Eti Soda facilities.

STAKEHOLDER COMMUNICATION PLATFORMS

Stakeholder Groups	Communication Platforms	Communication Frequency	Key Topics
Employees	Employee satisfaction surveys, Occupational Health and Safety ("OHS") reports, regular employee meetings, one-to-one interviews, social media account, website, intranet network, WhatsApp, ethics hotline, internal notification announcements, employee trainings, employee suggestion and complaint system, sustainability reporting and priority issue analysis	Regularly	Employee rights, employee development, employee awareness, health and safety systems, relations with senior management, career opportunities, responsible management, ethical business practices
Customers	Customer satisfaction surveys, regular meetings, social media, audits and site visits, conferences, website, sustainability reporting and priority issue analysis	Regularly	Product health and safety, customer complaints expectations and recommendations, service, product quality, uninterrupted supply chain, certifications, transparency, implementation of management systems, low-impact product lifecycle
Suppliers	Supplier surveys, regular supplier meetings, supplier evaluation process, audits and site visits, supplier days, certificates, social media, website, sustainability reporting and priority issue analysis	Periodically	Supplier engagement, supplier evaluation and development process, long-term contracts, timely payment, increased purchasing volume, notification of certification requirements
Local People	Open door practices, stakeholder committee meetings, corporate social responsibility projects, social media, website, sustainability reporting and priority issue analysis, visits to neighboring villages, community events	Weekly	Public health and safety, natural resource conservation, donations and support to local organisations, environmental impact of mining operation, water quality and safety, transparency, stakeholder engagement, employment opportunities, certifications, community investments
Shareholders and Investors	Committee meetings, legal financial and sustainability reporting, reporting as needed, social media, website, industry trade fairs, conferences and panels	Periodically	Transparency in communication and reporting with stakeholders, stakeholder rights, profitability, changes in perceived market value, establishment of corporate governance systems
Public Institutions	Official correspondence, regular meetings, audits and visits, legal and financial reporting, social media account, website, sustainability reporting and priority issue analysis	Regularly	Compliance with laws and regulations, contribution to the national economy, mandatory EIA, improvement of business conditions
NGOs	Stakeholder Committee meetings, site visits, social media account, website, sustainability reporting and material issue analysis, certificates, corporate social responsibility projects, memberships	Project based	Natural resource use, social and environmental compliance, equal opportunity, participatory governance, compliance with laws and regulations, employment, community investments
Educational Institutes	Internship programmes, career days, conferences, graduate programmes, social media account, website, sustainability reporting and priority issue analysis	Regularly	Internship programme, post-internship recruitment, cooperation with academy



PRODUCT QUALITY AND SAFETY

Sustainable control processes ensure our customer health and safety, and we are regularly subject to both customer and independent third party audits. Ensuring product quality and safety is amongst our highest priorities. We satisfy national and international regulatory and industry standards to ensure we meet the necessary requirements of domestic and export markets.

Our Quality Control Laboratory, which is ISO/IEC 17025 accredited, is staffed by our team of experts. We train our Food Safety Team members to enhance their skills and knowledge in accordance with our Corporate Culture and Product Defence Plans (against sabotage or food fraud).

[Click here](#) for Eti Soda's A.Ş. Quality Control Laboratory Quality Policy



We track our products through their life cycle using our traceability system and we employ an early warning and recall system based on international standards, in the unlikely event our products fail to meet standards and legal requirements. Traceability and recall exercises are carried out at regular intervals and during 2021, no non-compliance events occurred.

[Click here](#) for Eti Soda's A.Ş. Quality, Food and Animal Safety Policy.



We take our responsibility for producing one of the world's most widely used compounds seriously and to ensure the safety of these products, which are used in many industrial processes, human health and the environment, they are registered under the REACH (Registration, Evaluation, Authorisation and Restrictions of Chemicals) Regulations. This registration system controls the evaluation, authorisation and restriction of chemicals in use in the European Union. Our products are also pre-registered with the KKDIK (The Turkish Ministry of Environmental and Urbanization (MoEU) Regulation on chemicals and their safe use) regulation, which has come into force in Turkey, with the aim of completing registration by the end of 2023.

We meet food and feed safety management systems standards and all packaging materials come with migration test reports and declaration of conformity. We submit our products to an external competent laboratory for periodic content and safety assessment in line with our analysis plan and customer requirements. No complaints regarding product quality and safety were received during 2021.

Labelling regulations require that products carry EINECS (European Inventory of Existing Chemical Substances) and CAS (Chemical Abstract Services) numbers, production dates, recommended expiry dates and GHS (Globally Harmonised System of Classification and Labelling of Chemicals) displayed directly on the packaging. In addition, Safety Data Sheets are prepared and provided in the language of the country to which the product is exported.

OUR PRODUCT AND MANAGEMENT SYSTEMS DOCUMENTS

TS EN ISO 9001: Quality Management System	ISO 14046: Water Footprint Verification Certificate
TS EN ISO 22000: Food Safety Management System	BRC Food Safety Product Certificate
TS EN ISO 14001 : Environmental Management System	FEMAS Feed Safety Product Certificate
TS EN ISO-IEC 17025: Laboratory Test Accreditation	GMP+Feed Safety Management System
TS ISO 26000: Social Responsibility Management System	TSE Halal Product Certificate
TS ISO 37001: Anti-Bribery and Corruption Management System	GIMDES Halal and Tayyib Product Certificate
ISO 50001: Energy Management System	HAFSA Halal Product Certificate
ISO 27001: Information Security Management System	Kosher Product Certificate
ISO 45001: Occupational Health and Safety Management System	EPD Environmental Product Statement
ISO 14064: Carbon Footprint Verification Certificate	Zero Waste Certificate
	TSE Covid-19 Safe Production Certificate

Highlights of Quality Management Systems Practices in 2021:

- ▣ All audits carried out in 2021 were completed successfully, ensuring the continuity of our product and quality management systems certifications
- ▣ We became ISO 26000 Social Responsibility and ISO 37001 Anti-Bribery and Corruption Management Systems for the first time
- ▣ During 2021, across 27 audits, only six minor issues were identified and these non-conformities were resolved within the required reporting period.
- ▣ During shipment, quality control and field inspections conducted at our customers' request, no cases of non-compliance was detected
- ▣ Workshops and document updates ensured continuous improvement.
- ▣ The percentage of remedial activities within the system increases year on year. In 2021, 56% of all corrective and remedial activities were remedial



In 2021, we increased the number of remedial activities by 40%. Remedial activities play an important role in the development of management systems and form the basis of Kaizen studies. Of a total of 131 corrective and remedial activities carried out, 58 were corrective and 73 remedial.

CUSTOMER RELATIONS

In line with our customer-oriented approach, we have established a transparent and bilateral communication mechanism to prioritise the demands, requests and suggestions of our customers and to produce the most appropriate response. We comply with the principles of fairness, equality, transparency and professionalism in our relations with customers.

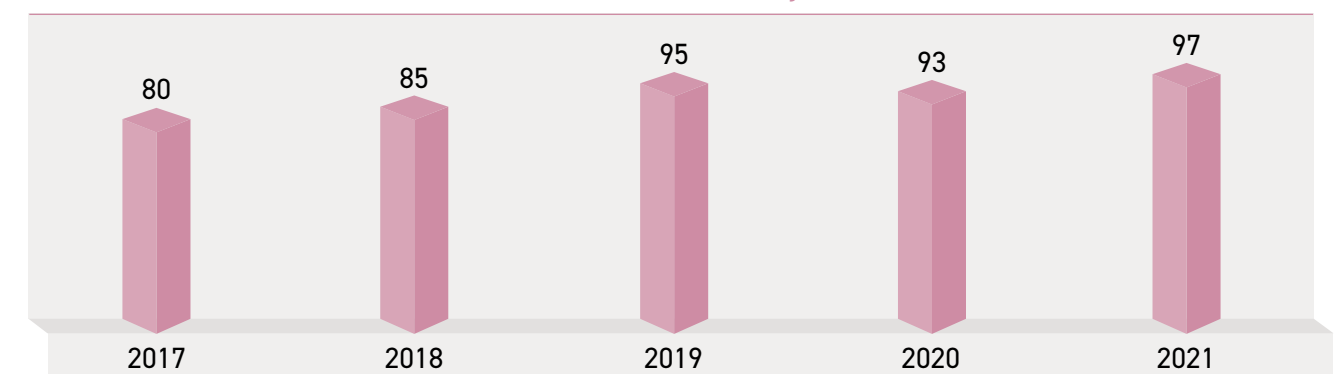
Through our Customer Relations team, we interact directly with customers in sales and after-sales, understanding their needs and expectations, defining customer-specific approaches and considering their suggestions and complaints. We facilitate communication between process owners and the Customer Relations team and create solutions to prevent the recurrence of complaints. We review and follow up customer complaints at periodically held meetings, with the participation of senior management. In 2022, in order to further improve the complaints process for customers, we will be adhering to the ISO 10002 Customer Satisfaction Management System framework.

We host our current and potential future customers at our facility, offer them the opportunity to see our production operations and provide information about the activities we conduct. We also visit our customers at their facilities in order to maintain good lines of communication. We conduct our customer visits with an interdepartmental team consisting of Customer Relations, Management Systems, Quality Control, Foreign Trade and Logistics and Sales-Marketing. Thanks to this active cooperation, we are able to effectively manage our customer service.



Soda Ash customers and producers, all come together at the World Soda Ash Conference, which is held in a different country every year. This annual gathering (online for 2020 and 2021) gives us the opportunity to meet with our customers and engage with them on the current business, market dynamics and our future plans.

Customer Satisfaction Rate by Year (%)



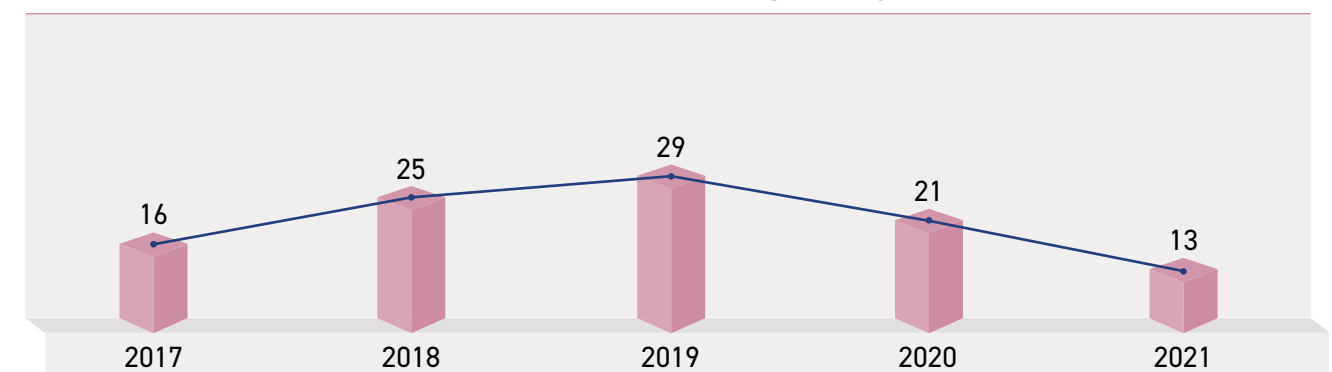
CUSTOMER SATISFACTION AND BRAND PERCEPTION RESEARCH

In 2021, we conducted the Customer Satisfaction and Brand Perception Survey with a more comprehensive and professional approach to determine the awareness, perception and satisfaction of Eti Soda's customers. In this study, carried out in cooperation with a third-party company, broad based interviews were conducted with 47 customers and in-depth interviews were conducted with three customers. According to the results, the area with the highest performance was "product quality", followed by "easy communication". "Honest and ethical behavior towards its customers", "competent firm" and "reliable firm" are the top three areas in which Eti Soda scored highest in the expectation-performance analysis. "Solution-oriented" was also scored highly by customers. Almost all of our current customers stated that they are satisfied working with Eti Soda. The satisfaction rate was 97%, above the sector average score of 91.3%.



We care about being able to respond quickly and effectively to our customers' requests and complaints. In 2021, a total of 13 complaints were received from our customers, which was the lowest level in the last five years. In 2021, the relevant units organised internal meetings at which reasons for the complaints were investigated and evaluated. In addition, port visits were conducted in order to investigate and reduce complaints in regards to loading.

Total Number of Customer Complaints by Year



INNOVATION

Achieving and maintaining global leadership means placing innovation at the core of our business strategy.

In addition to continuing to enhance and exploit our industrial know-how, we seek continuous innovation in our trona extraction and production processes in order to improve efficiency, maximise production output and further lower our unit production costs, to maintain the highest possible margins and the lowest possible emissions, water usage and waste. As part of this strategy, we encourage and support a culture of continuous improvement among our employees.

At Eti Soda we use solution-extraction and we are the only company in the world to successfully use solution-extraction on a commercial scale to exploit trona ore. Solution-extraction consists of injecting a pressurised, heated, low concentration brine into the subsurface ore body, which dissolves the trona into a more concentrated brine solution that is then extracted to the surface before being pumped to a central processing facility.

The closed-loop solution-extraction and processing system is safer and uses less energy and water. It also produces less CO₂, solid and liquid waste per unit of production than any other Soda Ash or Sodium Bicarbonate production method.

We hold a number of patents associated with different elements of our production process at Eti Soda. During the period, we benefited from tax advantages of more than 119 million TL (6.4 million USD), primarily from patent grants.

Low-carbon, solution extraction based natural Soda Ash prices at substantially the same level

ROCK MECHANICS PROJECT

In 2021, a Rock Mechanics Project was undertaken to determine the rock mass characterisation of four different geological formations in the extraction field and study the effects of solution extraction activities and the coal ore on each other. Core drilling samples were examined at the Middle East Technical University Rock Mechanics laboratory, and the structural integrity and permeability of the formations were identified. In subsequent stages of the project, 3D modeling will take place to optimise the heel distance between the production caverns.

as higher-carbon synthetic product. Management expects that this will change in the future, particularly in the EU, as the world becomes more carbon conscious and companies and consumers strive to reduce their carbon footprint, enabling the Group to capture a potentially significant economic "green premium" for its low-carbon products. To facilitate this, the Group is investing in and developing block-chain technology that will allow its customers (and ultimately end consumers) to have full supply chain environmental certification for its products.

Research and Development (R&D) studies are carried out by our Production and Quality Control team and in collaboration with universities. In 2021, we conducted studies to increase technical efficiency and reduce cost associated with solution extraction.



Tax advantages (TL)

	2019	2020	2021
Patent grant	85,543,095	95,315,327	117,251,745
Investment incentive	85,363,349	70,853,088	2,423,542

DIGITALISATION



Digitalisation is used in our production processes to enhance our competitiveness and sustainability, as well as increasing our brand value.

In 2021, we invested approximately EUR 0.75 million in digitalisation. In the coming period, we plan to invest nearly EUR 0.8 million in the digitalisation of our water disposal, extraction and logistics units.



ETİ SODA DIGITALISATION PROJECTS

Update Studies: We aim to upgrade our cyber security and technical support OT (operational technology) used in the cogeneration plant with the latest state-of-the-art software and hardware systems.

Mining Automation System (Phase 6): The objective of this project is to ensure traceability and control of data from newly drilled wells via an automated system, which records the process data digitally and reduces errors caused by manual field observation.

Common Reporting Infrastructure: To be established throughout the production facilities, we will manage reporting from a single source. Standardised templates for relevant data requests will ensure reports are generated automatically, analysing the process data and identify improvement points in the production processes. Data will be traceable and archived, reducing human error and leading to a more efficient use of the workforce.

Digitalisation in Logistics: The planned digital platform will improve efficiencies in the management of planning and logistics. It will be possible for port and land operations to be tracked in real time by our logistics team and customers.

Supply Chain Digitalisation: A Supplier Portal will ensure effective supply chain management and allow us to respond more rapidly to the increasing needs and expectations of our customers.

INFORMATION SECURITY

In 2018, we launched our ISO 27001 accredited Information Security Management System, Information Security Policy and Personal Data Protection Policy in accordance with which we manage the confidentiality, integrity and usability of all corporate and personal data. We operate based on the principles of legality, honesty and transparency in the protection and processing of data and we ensure employees follow these principles.

During 2021, we revised our Information Security Policy. In addition we reviewed all HR documentation and procedures and minimised the amount of data held in order to comply with Personal Data Protection Law,

[Click here](#) for the Eti Soda A.Ş. Information Security Policy.



ENVIRONMENTAL MANAGEMENT

By producing natural Soda Ash and Sodium Bicarbonate with solution extraction technology, we consume less energy and water, and generate less waste and carbon emissions compared to other production methods. We take a life cycle approach to the environmental impact of our operations, evaluating the effects on factors such as population, air, soil, water, flora, fauna and other natural resource consumption. We determine the probability and severity of risk to the environment and implement action plans to mitigate those risks

Our management approach considers not only sustainable development and growth but also efficient and controlled use of natural resources. We act with integrity and responsibility, taking all necessary measures to reduce our environmental impact whilst meeting the needs of the current generation and ensuring we are protecting the ecological balance of our environment to transfer on to future generations. We ensure continuity of communication with our employees, local communities and stakeholders and in 2021, provided training to 1,203 employees and subcontractors on relevant environmental topics.

Our mineral extraction and processing operations are subject to strict regulations by governmental authorities, with respect to protection of the environment and we operate a rigorous compliance programme to ensure that our facilities comply with all applicable Turkish environmental laws and regulations. We comply with international management standards such as ISO 9001 Quality Management System, ISO 14001 Environmental Management System and ISO 50001 Energy Management System and our greenhouse gas and water management calculations made according to ISO 14046 and ISO 14064 standards.

Local and Accidental Pollution



In 2021, there were no notifications, non-compliances or environmental accidents resulting from our activities. We measure and monitor the environmental impact of our activities and at our facility dust and emission measurements are recorded and monitored by accredited third-party organisations. We also hold an Environmental Noise Exemption Certificate. Our facility is located in a rural area where the traffic is light and the timing of transport and dispatch routes are planned, to reduce the likelihood of traffic congestion.



In December 2017, Eti Soda received an EPD certificate¹, which is an independently verified and registered document that communicates transparent and comparable information about the life cycle environmental impact of products. We believe Eti Soda is the first and, to date, the only Soda Ash producer globally to hold an EPD certificate for Soda Ash and Sodium Bicarbonate products. The voluntary EPD-related information presented by Eti Soda was prepared within the scope of ISO 14025 and ISO 14040/44 (LCA-Life Cycle Assessment), approved by independent accredited validators and published on an internationally accredited EPD platform. We value staying up-to-date in our business approach, and we renewed our EPD and LCA studies for Eti Soda in 2020, even though such an update was not required for two more years.

An Environmentally Friendly Product



By reducing the melting temperature of silica sand in the glass manufacturing process, Soda Ash significantly reduces energy consumption and contributes to the reduction of emissions. It is used in the production of lithium carbonate, which is used in lithium ion batteries, which are widely used in electric vehicles. In addition, Sodium Bicarbonate contributes to the protection of the environment by absorbing air pollutants such as sulfur dioxide and other harmful chemicals from shipping and other industrial flue gas emissions.

Eti Soda reports environmental impact data to the CDP annually, calculated and verified in accordance with the ISO 14064 standard. For 2021, Eti Soda became the leader in Turkey with an A- rating in the CDP Climate Change Programme and have a global leadership position with an A rating in the Water Security Programme . A water security grade of A means that Eti Soda is in the global leadership band of fewer than 120 organisations that are implementing current global best practices.

In 2021, Eti Soda received an EcoVadis gold medal. EcoVadis is a leading provider of business sustainability ratings. EcoVadis determined that our performance was above average in each of the four major assessment categories of environment, labour & human rights, ethics and sustainable procurement.

¹As a voluntary declaration, having an EPD certificate for a product does not imply that the product is environmentally superior to alternatives, but it does allow us to better assess the environmental impact of our production processes, and supports a more efficient and environmentally responsible use of resources.

²LCA is a method of assessment where the environmental effects of a product, service or process can be calculated, measured and reported, starting from the extraction and processing of the raw material, through to production, usage and end of life disposal, and which provides information on the efficiency of resource usage and waste material management.

³CDP is an independent non-profit organisation that communicates information about the life-cycle environmental impact of products and processes for more than 13,000 companies globally.

⁴Under CDP, the global average climate change grade is B-, the European average is B and the global mineral mining industry average is C; the global average water security grade is B, the European average is B and the global mineral mining industry average is B-.

WATER MANAGEMENT

Efficient use of water and sustainable water resources management is one of the important principles for achieving the Sustainable Development Goals of the United Nations' 2030 Agenda for Sustainable Development. Better water resource management is required to improve global water security and we have been investing in projects which support water efficiency in addition to setting short and long-term targets aimed at minimising our water usage.

Water is essential to Eti Soda's trona extraction operations. Solution-extraction consists of injecting a pressurised, heated, low-concentration brine into the subsurface ore body, which dissolves the trona and a more concentrated brine solution that is then pumped to the surface before being transferred to a central facility and processed to produce Soda Ash and Sodium Bicarbonate via a closed-loop system, with minimal impact on the surface and using significantly less energy and water than other production methods. However, solution extraction is dependent on a continuous supply of water, disruption of which represents a business continuity and operational risk. The physical safety of the Sarıyar Dam basin, the only water source

[Click here](#) for the Eti Soda A.Ş. Water Policy.



used in our operations, along with respecting the legal water withdrawal limits from this basin, are important risk management considerations.

In 2018, a water management system was established at Eti Soda to manage water related risks and to calculate our water footprint in accordance with the ISO 14046 standard. In 2021, Eti Soda became a signatory of the CEO Water Mandate, an undertaking of the UN Global Compact.

As part of our sustainability reporting, we have committed to the following water usage targets:

- › Maintaining recycled water volumes at between 20% and 25% (defined as recycled water divided by total withdrawal water); and
- › Maintaining the amount of discharged water at between 15% and 20% (defined as discharged water divided by total withdrawal water).

As of 2018, the water footprint calculations we carry out in accordance with the ISO 14046 standard are verified by third-party organizations. In addition, we have been reporting within the scope of the CDP Water Security Program since 2013. In 2021, we achieved a global leadership rating with an A score in the CDP Water Security Program.



Annual evaluations are carried out according to ISO 31001 Risk Management Standards, using environmental impact and life cycle assessments as well as national and international database tools and resources. Since 2018 our water footprint is calculated annually in accordance with the ISO 14046 standard verified by third-party independent external organisations such as the British Standards Institution ("BSI").

Efficiency improvements during the reporting period resulted in a 3.3% decrease in water usage per tonne of production (water intensity) to 1.75 m³/tonne compared to the previous reporting period.

Quality criteria for water discharge is determined according to the Water Pollution Control Regulation and requires the profile of the wastewater reservoir and the characteristics of the wastewater to be evaluated. On a weekly basis, the discharge water from both treatment plants is analysed in our laboratory, in addition to the analysis performed by independent accredited laboratories. The quality of our discharge water complies with the limit values determined in the Water Pollution Control Regulation and during the reporting period there were no cases of discharge standards being exceeded.

	2018	2019	2020	2021
Total water withdrawal (m³)	3,039,140	2,989,875	3,185,567	3,419,308
Recycled and reused water (m³)	755,989	713,854	675,339	753,629
Recycled and reused water percentage (%)	24.88	23.88	21.2	22.04
Industrial wastewater discharge (m³)	532,727	505,297	588,976	673,968
Domestic wastewater discharge (m³)	21,155	35,305	34,683	57,918
Water intensity (Total water withdrawal m³/tonne product)	1.67	1.61	1.81	1.75

Reverse Osmosis Equipment Membrane Replacement

In 2021, membrane replacement was carried out to reduce the amount of reverse osmosis wastewater washing, to improve its quality, achieving the following improvement:

- ▣ Reverse osmosis equipment wastewater washing amount before change: **14,409 m³/month**
- ▣ Reverse osmosis equipment wastewater washing amount after change: **13,030 m³/month**
- ▣ Conductivity value of water produced before replacement: **33 µS**
- ▣ Conductivity value of water produced after replacement: **23.1 µS**

ENERGY AND EMISSION MANAGEMENT

The deterioration, and ultimately loss, of ecosystems, water scarcity and food security, impact on infrastructure, human migration and increased inequality are all consequences of climate change which adversely affect our environment and is considered the greatest existential threat faced by today's world.

[Click here](#) for the Eti Soda A.Ş. Climate Change Policy.



Aware of these effects and risks, managing our operations through responsible energy consumption and greenhouse gas emissions management is a priority. Our focus on improvements in energy efficiency and reduced greenhouse gas emissions is key, with the aim to implement multiple projects which improve our performance and produce energy from renewable sources.

ENERGY MANAGEMENT

As producers of Soda Ash we operate in an energy-intensive sector. For this reason, we strive to keep our environmental impact to a minimum, meeting our energy needs in a highly efficient manner. Our Energy Production and Environment departments continuously work on projects to improve our carbon footprint, to reduce our impact on energy-induced climate change and achieve our emissions targets.

[Click here](#) for the Eti Soda A.Ş. Energy Efficiency Policy.



	2018	2019	2020	2021
Electricity generation (KWh)	61,412,009	93,572,582	82,905,604	89,797,956
Total net electricity consumption (KWh)*	509,199,345	474,604,127	451,676,937	498,212,620
Total steam consumption (TOE)**	68,238	69,878	64,590	68,735
Total energy consumption (TOE)**	130,732.68	128,146.46	121,082	128,967
Total energy intensity (TOE**/tonne)	0.0719	0.0689	0.0687	0.0661

*Amount of electricity received from the grid kilo-watt hours (KWh)

** Tonne of equivalent oil

Energy Efficiency Projects in the Reporting Period

- By starting to swap to LED lighting at site in 2021, we achieved energy savings of 11.3 MJ mega joules in 2021. These conversion works will continue into 2022.
- To reduce the ambient temperature of the Atlas compressor building and to prevent dust from the coal/lime stock area entering, an external fan with the clean air inlet on the boiler side was installed. This resulted in compressor air intake temperature reduction of 100C, airflow increase and electricity consumption reduction.
- Work on a biomass boiler project as an alternative energy source commenced and investigations with suppliers continue.

Projects to Increase Productivity

In 2021, an energy audit was conducted to assess energy consumed at our site, identify energy-saving opportunities, protect the environment and reduce the burden of energy costs on the operating budget. As a result of this study, 33 Efficiency Increasing Projects (EIP) were identified. We plan to complete five EIP projects in 2022. With the completion of these projects, we aim to save 7,408 MWh of electricity and expect to reduce the amount of CO₂ by 4,324.89 tonnes/year.

EMISSION MANAGEMENT

Our industry is energy-intensive, and therefore, emission management is essential. As a producer of natural Soda Ash and Sodium Bicarbonate using solution extraction techniques, we are in an environmentally, socially and economically advantageous position. Our carbon emission value is almost half of the benchmark value published by the European Union for Soda Ash producers.

Science-Based Goals

In accordance with the requirements of the Paris Agreement and our aim to reduce our carbon emissions, we started the application process for the SBTi by submitting our letter of commitment on 4th May 2021.

CDP Climate Change Programme

We have participated in the CDP Climate Change Programme since 2013 and in 2021 became one of the leading companies in Turkey by raising our 2020 B rating to an A- rating

In 2021, we completed our corporate carbon (Scope 1,2 and 3) footprint verification studies in accordance with ISO 14064 standards. The table summarises our GHG emissions data.

Greenhouse Gas Emissions	2012	2018	2019	2020	2021
Scope 1 (tonne CO ₂ e)	470,750	441,892	437,184	435,145	464,688
Scope 2 (tonne CO ₂ e)	192,606	227,166	218,181	207,550	215,648
Scope 3 (tonne CO ₂ e)	-	123,613	119,937	103,056	337,747*
Carbon Emission Intensity (Scope 1+2 tonne CO ₂ e/tonne production)	0.649	0.368	0.352	0.365	0.349
Total Greenhouse Gas Emissions	663,356	792,671	775,302	745,751	1,018,083

*Calculation was made in 2021 according to the 2018 version of the ISO 14064 standard, and scope 3 emissions were reviewed in detail.

In addition to carbon footprint calculations, we also measure flue gases according to environmental legislation. Dust, SO₂, NO_x, CO and benzo(a)pyrene parameters are measured in compliance with external emissions criteria every two years. In addition, PM₁₀, settled dust, SO₂ and NO₂ measurements are also taken as a part of air quality control every two years.

The energy efficiency projects carried out in the reporting period and planned for the upcoming periods are as follows:

- ▣ Elimination of compressed air leaks
- ▣ Replacement of injection pumps and motors
- ▣ Frequency converter application
- ▣ Pump application efficiencies
- ▣ Replacement of cooling tower fans
- ▣ Optimisation studies (isolation, etc.)
- ▣ 2 megawatt hours (MWh) solar panel installation (2022)
- ▣ 6 MWh solar panel installation (2024)
- ▣ Combustion of biomass with coal in the boiler (2022)
- ▣ Obtaining renewable energy certification (2022)



WASTE MANAGEMENT

We aim to create less waste by using resources more efficiently. Where possible, we aim to recycle by-products and improve the sustainability of our production processes through the reduction or elimination of waste through recycling, reusing and recovery in a manner that does not harm people or the environment and contributes to the circular economy by recycling, reusing, and recovering waste.

At the Eti Soda facility, solid waste is produced by the coal fueled cogeneration unit, comprising fly ash which is sold to local cement companies, and slag which is permanently stored in the tailings dam. We are currently evaluating the use of woodchip biomass in the cogeneration unit, enabling us to reduce the amount of fly ash and slag, and also reduce emissions intensity. Eti Soda also produces a small quantity of liquid waste in the form of purge solution which is stored temporarily in the purge dam before being partly reprocessed into soda ash. Lime mud (CaCO_3) obtained from the caustic production unit is currently sold as a by-product to

nearby power plants for flue gas desulphurisation. We are evaluating the construction of a calcination unit to convert lime mud into CaO for re-use in caustic soda production, further increasing the efficiency of the plant (by recycling a by-product) and improving sustainability (through the reduction, elimination and commercialisation of waste).

Conducting our operations with minimum environmental impact is the basis of our environmental management approach. We separate the hazardous from non-hazardous waste in the most appropriate way and carry out disposal in tandem with approved suppliers and meticulously carry out all the necessary follow-ups and measurements.

We have established a Zero Waste Management System for which we have earned a Zero Waste Certification. As a result of the processes we have implemented we aim to achieve a platinum level rating in the next assessment period.



Disposal Method	Hazardous Waste* (tonnes)				Non-Hazardous Waste (tonnes)			
	2018	2019	2020	2021	2018	2019	2020	2021
Incineration	-	0.03	0.08	0.07	-	0.02	0.01	0.02
Recycling of waste by other processes	0.30	0.74	0.96	15.8	4,710	1,274	270	93
Intermediate storage	32	33,340	46,127	19,420	-	3,900	1,760	4,580
Landfill	-	-	-	-	-	78,852	67,032	70,272
Reclamation of metals	3.2	6.02	9.06	6.42	-	-	-	-
Reuse of oils	4,82	2,30	35,54	7,42	-	-	-	-
Alternative raw material	-	-	-	-	24,395	35,980	61,194	68,881
Reclamation of inorganic materials	-	-	-	-	-	-	45.52	130.76

*Our hazardous waste is delivered to licensed companies in order to be disposed of in the most appropriate way and to minimise damage to the environment.

Prominent Practices in the Reporting Period

68,785 tonnes of fly ash were sent to licensed companies for reuse in cement manufacturing as an alternative raw material, instead of being sent to landfill.

Our Greenhouse Project, in cooperation with Ankara Metropolitan Municipality, which was commissioned in 2021, has enabled condensate recovery, contributed to the agricultural activities of the local community and supported women's employment.

All products which don't conform to standard in the input and production control processes are reintroduced to the system for reworking. In 2021, a total of 730 tonnes of product was reintroduced to the system.

A crystallisation pond was constructed and here solution which is recovered from the decahydrate units undergoes crystal precipitation. Product which is recovered is used in the Mineral Production process.

BIODIVERSITY

In recent years the loss of ecosystems and biodiversity due to the impact of climate change and industrialisation shouldn't be underestimated. We are conscious of and constantly assess the potential impact our operations have on the Ankara Beypazarı region where we operate; we monitor our impact on the wildlife in the region and develop projects that focus on protecting the ecosystem and maintaining biodiversity.

We implemented the 'Eti Soda Exemplary Vineyards' project introducing additional grape to the Beypazarı region and using cultivation methods to ensure high yield. We have provided training for local people to teach them how to grow these grape varieties, protect and harvest them for commercial benefit. In addition to the vineyard project, we continue to farm in the region to support local economic activities and resources, ensuring the sustainability of agricultural lands.

[Click here](#) for the Eti Soda A.Ş. Biodiversity Policy.



During this period, we created the Eti Soda A.Ş. Biodiversity Policy and the Biodiversity Protection and Monitoring system, to execute the policy.

In cooperation with a local environmental consultancy firm and academics, we carried out the Biological Diversity and Action Plan Preparation Project, which includes field and inventory studies, in order to protect and promote endemic species and wildlife in the region. As a result of these studies, we mapped local biodiversity and created the Eti Soda Biodiversity Inventory Report. In the report, 251 different plant species were identified, 30 of which are native to Turkey. The decision was made



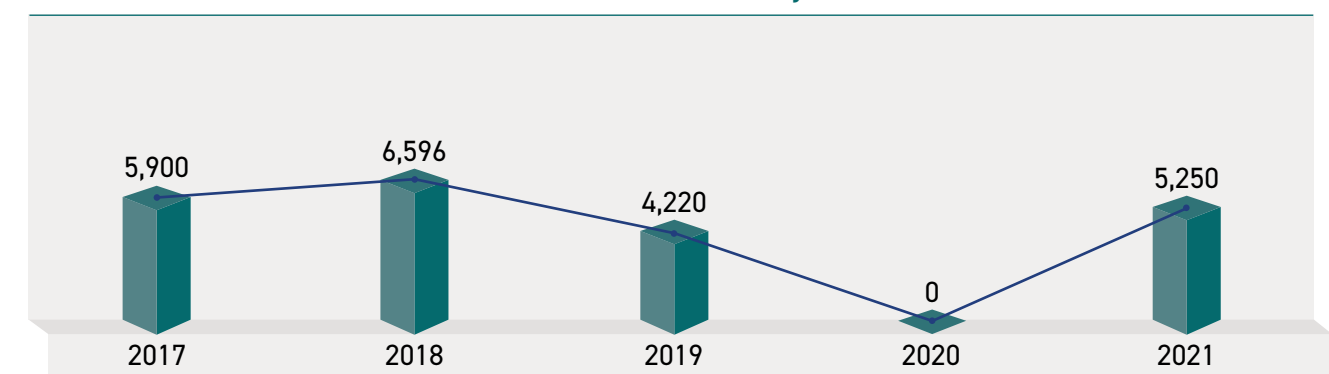
to protect six endemic plant species from the critical species group. An Eti Soda Endemic Plant Protection Garden will be established and the seeds of these six endemic plant species will be collected at appropriate times and delivered to the Turkey Seed Gene Bank, in order to ensure a future for these species.

We also conducted an inventory study, the first stage in monitoring the conservation and dissemination of wildlife in the region. Mammal species were monitored with photo traps placed around the facility. As a result of the study; 22 mammals, 142 birds, 16 reptiles and 508 invertebrate species were identified. Following this we initiated the Egyptian Vulture Monitoring, Conservation and Awareness Raising project. Through

this project, we aim to understand, monitor and protect the Egyptian Vulture and also study their migratory routes. In addition, we plan to organise a competition to name the vultures with Eti Soda Special Education and Practice students, and to increase awareness of this endangered species. In the project, online links will be shared in order to follow the vultures on social media. At the same time, a research paper on this bird will be prepared to contribute to understanding and literature on the vulture.

Even though works on afforestation stopped in 2020 due to the pandemic, in 2021 we re-commenced our efforts on this project and planted 5,250 blue cypress trees locally.

Number of Trees Planted by Years



An aerial photograph of a coastal region. On the left, a rugged, brownish coastline meets the sea. A winding road follows the shore. In the center, a bay with clear, turquoise water is filled with numerous white sailboats. To the right, a cluster of buildings with red-tiled roofs is nestled on a hillside, surrounded by greenery. The word "OPERATIONS" is overlaid in large white letters on a brown rectangular background in the lower-left quadrant of the image.

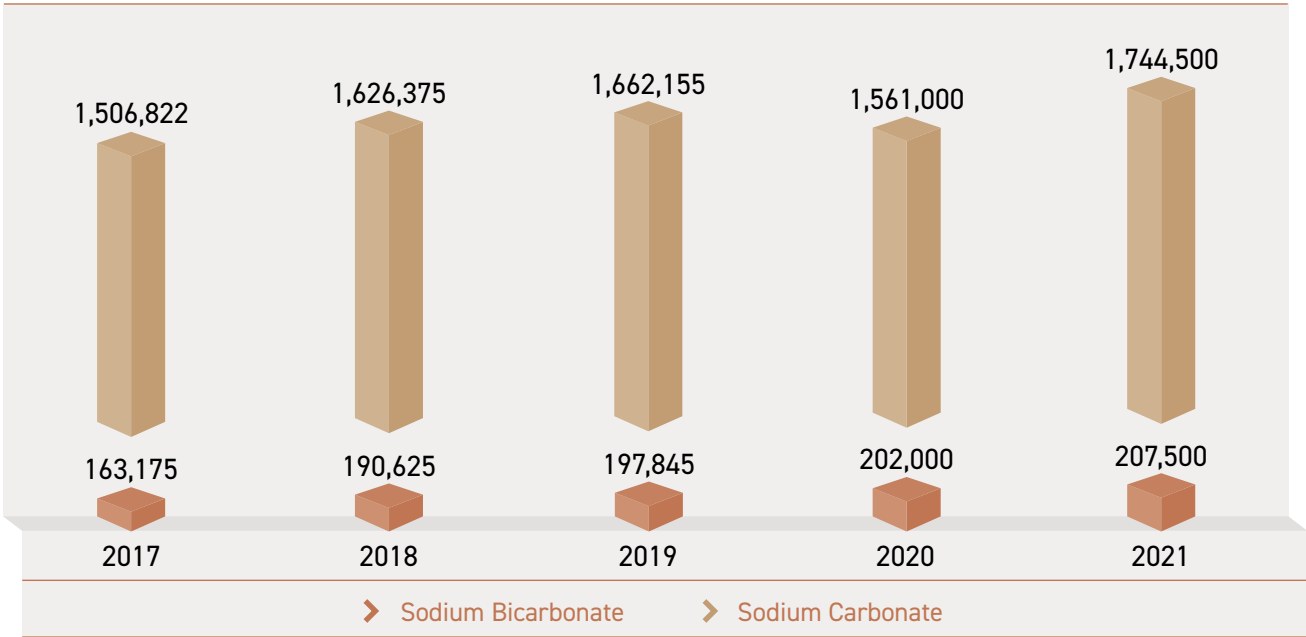
OPERATIONS

102-6;102-9

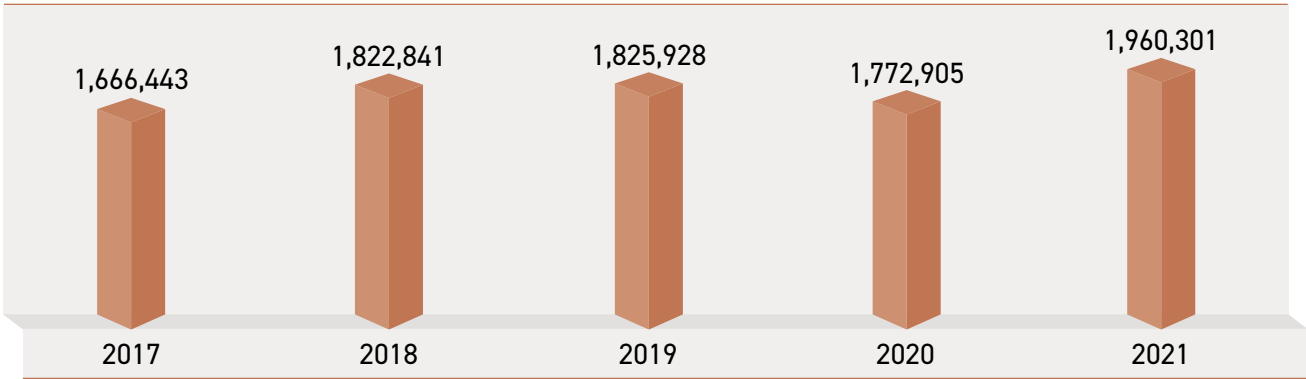
We have a customer-oriented approach to our sales and export processes, understanding the needs and expectations of our customers through regular meetings, account management processes, audits, visits and stakeholder engagement. We analyse any risks which might result in customer dissatisfaction and take the necessary actions to improve. We are working to expand our current customer portfolio and have built solid commercial relationships, ensuring that we optimise benefits for current and potential customers, closely monitoring the market to identify further opportunities.

Eti Soda's current sales network extends to more than 70 countries from Europe to Africa, America to Asia, and includes the Middle East and island countries.

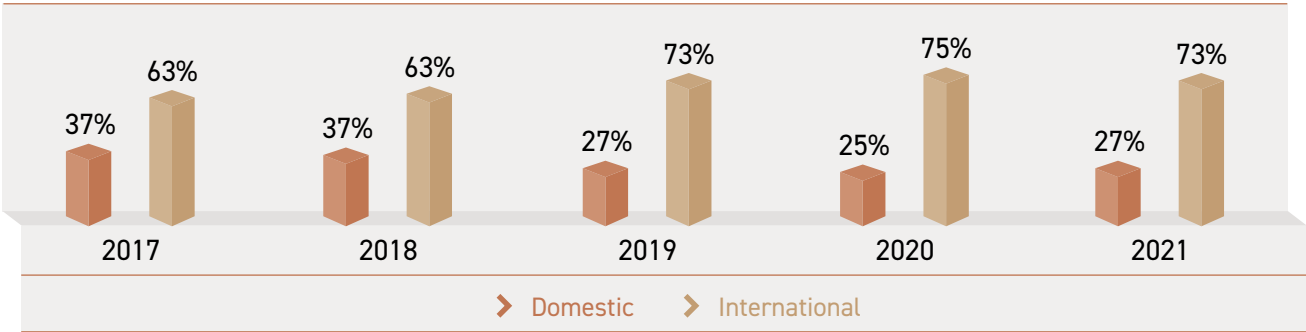
Production Amount (Tonnes)



Net Sales (Tonnes)



Distribution of Net Sales (%)



MOST EXPORTED COUNTRIES (tonnes)

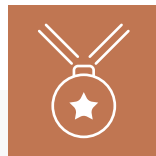
Country	2020	Country	2021
Italy	167,675	Italy	161,700
Spain	106,175	England	101,586
England	98,490	Ukraine	98,788
Portugal	83,325	Belgium	97,880
India	78,338	Spain	86,550

We deliver
our products
all over the
world.



RESPONSIBLE SUPPLY CHAIN

We focus on developing long-term and ethical trading relationships with companies in our supply chain, in line with our principle of providing sustainable products and services to our customers. We carry out screening and procurement processes in accordance with legal requirements and Eti Soda Code of Ethics.



We improved our Ecovadis rating from “Silver Medal” in 2020 to “Gold Medal” in 2021. Post period end in 2022, we created a programme called ‘Connexsa’ which is a blockchain enabled system designed to ensure assured/certified transparency of full life cycle environmental impact of our product in the value chain.

Suppliers in our value chain provide us with raw and other production materials. We are members of the SEDEX platform and through this we work to spread our sustainability values throughout our supply chain. We expect our suppliers to adopt the same working principles as Eti Soda, in accordance with human rights requirements and to act responsibly towards third parties. We have zero tolerance for discrimination, human trafficking, child or forced labour in our operations or those of our suppliers, distributors or customers.

We monitor the environmental and working conditions of our suppliers and all suppliers who wish to work with us are obliged to sign our OHS & Environmental Specification. In addition, approximately 38% of our approved suppliers have ISO 14001 Environmental Management System certificate. In 2021, no suppliers were determined as having any negative environmental impact, required a warning or whose contract was terminated due to violation of environmental criteria.

We evaluate our suppliers within the framework of the Supplier Evaluation Procedure. In 2021, we updated our Supplier Evaluation Procedure to include food and feed safety. In addition to our purchasing policy, we require them to complete our Supplier Sustainability Evaluation Questionnaire, in which management systems, food and feed safety, OHS, environment and social compliance criteria are assessed. Suppliers with satisfactory scores are included in our approved supplier list.

We establish close relations with our suppliers based on mutual communication and trust, ensuring that our suppliers adopt the ethical and technical requirements of our responsible supply chain expectations. At our Supplier Event Days, we ensure that our suppliers are informed about our sustainability efforts and current developments. We set out our expectations to suppliers and provide training for their continuous improvement. In 2021, we provided 504 person*hours training for suppliers.

Our procurement policy aims to support both development of the local economy and continuity of the annual mining plan, by providing opportunities for local suppliers. For example in 2021, we awarded a contract to a local drilling contractor for new wells.

We have established the Eti Soda Supplier Portal (partially completed) in order to ensure that supply chain management is carried out more effectively and to respond more quickly to the increasing needs and expectations of our customers and suppliers.

As a result of supply chain sustainability studies in 2021:

- › We created the Eti Soda Supplier Code of Conduct. 38% of our approved suppliers signed the code.
- › In tandem with Anti-Modern Slavery and Human Trafficking Policy, we have published procedures which outline our control systems against modern slavery and human trafficking crimes in our supply chain, and we are working to ensure that modern slavery does not occur at any stage of our supply chain. In the coming period, we will continue our efforts to notify all our suppliers of the Anti-Slavery and Human Trafficking Policy and all our suppliers have been asked to sign the Supplier Code of Conduct.
- › In 2022, we continued our efforts to encourage suppliers to become members of the SEDEX (a globally recognized ethical trading platform) and fill out the on-line SAQ (Self-Assessment

Questionnaire). Eight out of the 38 companies contacted as part of the SEDEX membership project have completed their registrations and have linked relationships with Eti Soda in the SEDEX system. After the completion of the SEDEX and SAQ processes, we will have greater transparency of our supply chain and be able to conduct supplier risk analyses.

- › As a result of our ISO 26000 social compliance audits, our suppliers also underwent social compliance audits in 2021 and no violations were detected. In the future, where risk analysis indicates a need, we aim to request third-party social compliance audits for companies in our approved supplier pool.
- › We started to use the Refinitiv World Check One platform for sanctions compliance screening, which became increasingly important globally in recent years. The programme allows us to research all our old and new suppliers and follow up on any sanctions or embargo matters.

Suppliers who have signed the Supplier Code of Conduct (% spend value vs total spend)

Target
50%

Actual
51%

% of suppliers with ISO 14001 and ISO 45001/TS 18001 certificates vs total number of approved suppliers

Target
20%

Actual
20%

WORK LIFE AT ETI SODA



102-35

We believe that our employees are our most valuable asset and core to our success and we strive to be a preferred employer.

We attach importance to a diverse, dynamic and well-educated workforce. We empower operational

management and we invest substantially in the training and development of our employees to continuously develop their skills. We believe that employees who are well trained, empowered and accountable for their actions, work most effectively and are best able to achieve their full potential.



DIVERSITY AND INCLUSION

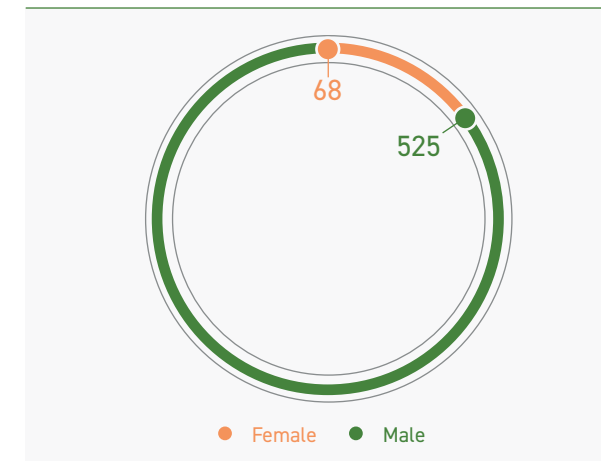
We aim to create a respectful, fair and diverse work environment for our employees, where they can work with confidence. To achieve these goals we structure our efforts around the Eti Soda Human Resources Regulation and Business Ethics Framework.

Human resources processes prevent discrimination based on religion, language, ethnicity, gender, age, disability, political thought, philosophical belief. We adopt the principle of equal pay for equal work. Through Eti Soda's Corporate Policy and Guiding Principles booklet we raise employee's awareness of the principles. Accordingly, there were no cases of discrimination in the reporting period.

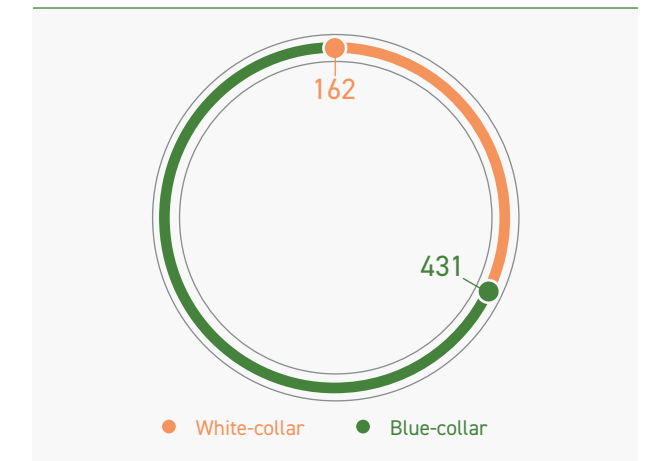
At Eti Soda, we seek to eliminate gender inequality. We support female employment and conduct studies to support existing female employees. In 2021, our female employment rate was 11.5% and we aim to increase this ratio in order to improve equality in the workplace. We intend to become a signatory to and implementer of the Women's Empowerment Principles, an initiative to empower women in business life, developed in partnership with the United Nations Gender Equality and Women's Empowerment Unit and the United Nations Global Compact.

During the period, we celebrated International Women's Day on 8th March as a mark of respect for

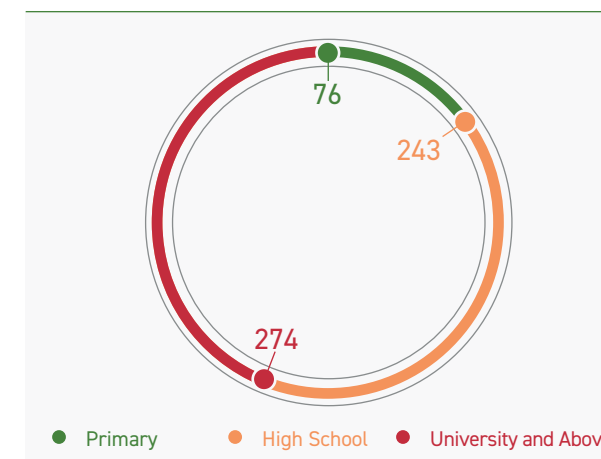
Total Number of Employees by Gender



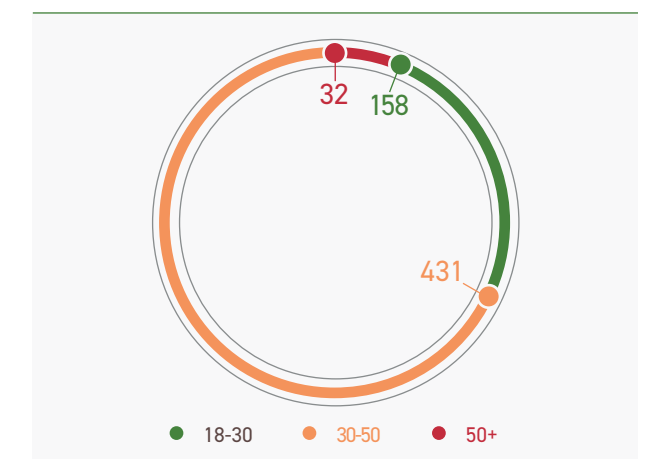
Total Number of Employees by Category



Total Number of Employees by Education Level



Total Number of Employees by Age Group



all of our female employees at Eti Soda. In addition, we provided self-defense training to 26 female employees and will continue providing this training in 2022.

We also carry out activities for our disabled employees based on our principle of facilitating and supporting the participation of disabled employees in the workplace and corporate social activities. Our 22 employees with disabilities and their next of kin were given a day of administrative leave on World Disabled Persons Day on 3rd December. As part of this special day, we organised a dinner event which brought our employees with disabilities and managers together.

We also attach importance to youth employment and in 2021, the ratio of our employees under the age of 30 was 27%. We participated in career days at various universities, including Middle East Technical University and Istanbul Technical University, in order to enhance the brand value of our organisation whilst encouraging and attracting young talent to our company.

[Click here](#) for the Eti Soda A.Ş. Equality Diversity and Inclusion-Policy.



EMPLOYEE DEVELOPMENT AND TALENT MANAGEMENT

We carry out regular training and development activities, with the aim of strengthening the social, technical and professional knowledge and skills of our employees.

12,086 person*hours of training was targeted for 2021 and 16,970 person*hours of training was delivered to 593 employees. The average training hour per person was 28.6 person*hours. Our blue-collar employees were given 10,982.5 person*hours, and our white-collar employees were given 5,987.5 person*hours of training. In the same period, a total of 504 person*hours training was delivered to 672 subcontractor employees.

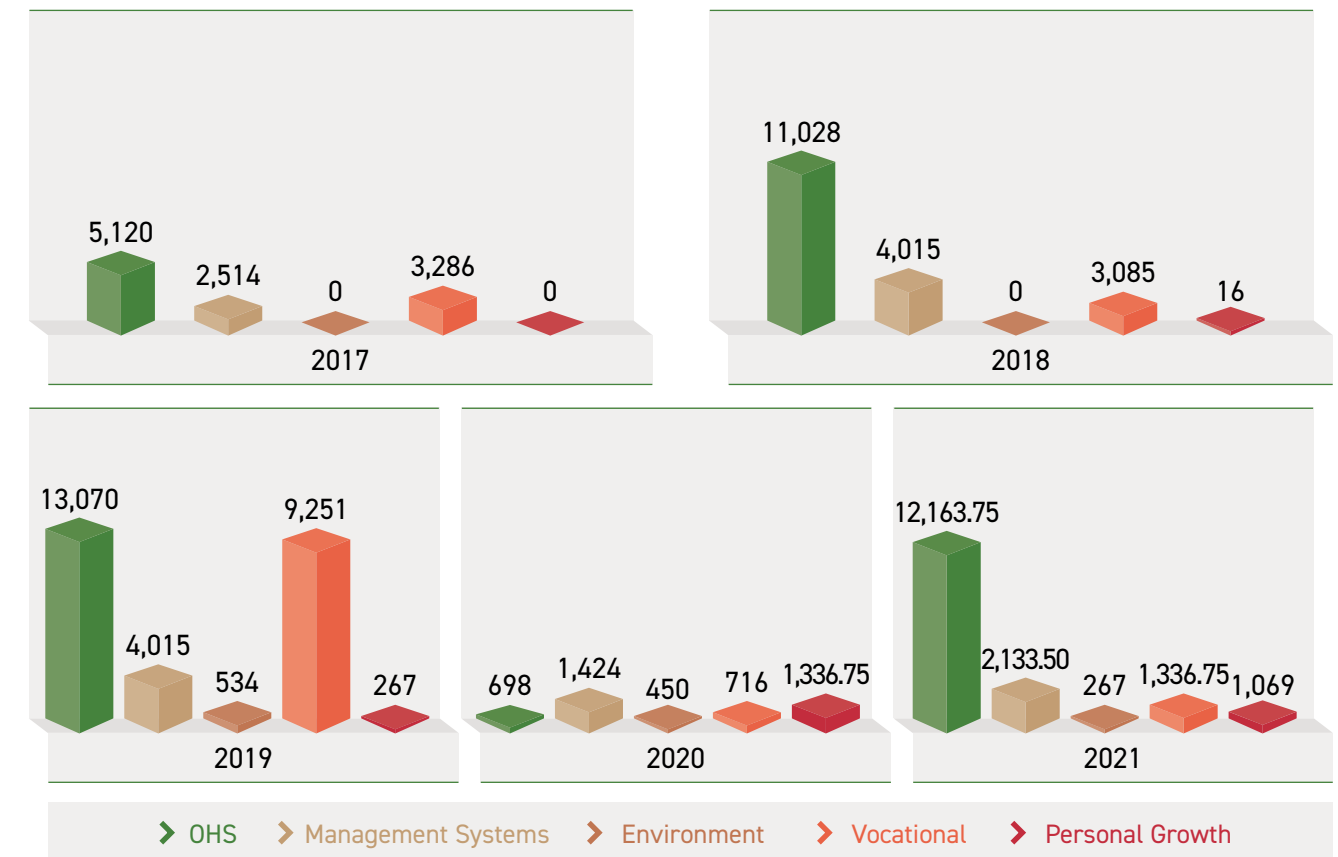
2021 Training Data

Title	Training (person*hours)	Share of Total
Occupational Health and Safety	12,163.75	72%
Management Systems	2,133.50	12%
Vocational	1,336.75	8%
Personal Growth	1,069	6%
Environment	267	2%

Average Number of Training Hours per Person 2017 - 2021



Distribution of Education Type 2017 -2021



Due to the ongoing Covid-19 pandemic in 2021, we organised Stress Management Training, Post-Pandemic Psychological Health Protection Training and Emotional Resilience and Agility Training to reduce the level of anxiety and increase motivation of the employees.

Thanks to our talent management approach, we closely follow the career and performance developments of our employees; and we hold performance evaluations in line with specified and objective criteria. After the evaluation, results are discussed in detail with effective feedback methods in employee interviews. In 2021, 423 blue-collar and 145 white-collar employees received personal development performance feedback.

Internship Programme for Local Students



We provide internship programmes for engineering students from technical high schools and universities every year. We make it a priority for local students to access the programme - university students do internships for one month and technical high school students for four months.

EMPLOYEE ENGAGEMENT

We are aware of the fact that employee satisfaction has an important role to play in the formation and development of employee loyalty. Therefore, we focus efforts on employee well-being and take into account their work-life balance, in order to increase employee motivation and satisfaction. We strive to create a participatory and communicative corporate culture which allows our employees to express and see their ideas and suggestions implemented in the best way possible.

As part of our efforts to improve employee well-being and to establish a work-life balance, we allow social leave and absence leave for special situations. We are also planning to implement two extra days of bereavement leave in addition to the three-days of legal bereavement leave already in place, where an employee loses a close relative.

We make additional payments to employees for social assistance in cases such as birth, death or marriage. In 2021, 33 employees benefited from the additional payment.

We provide certifications to our newly recruited and promoted employees by making donations to a national children's cancer charity on behalf of them. With this practice, we increase employee satisfaction and contribute to relevant organisation.

In 2021, we created Complementary Health Insurance (CHI) Policies, so that our employees can benefit from a broader range of health services. Spouses and children of employees can benefit from the CHI at a discount. In 2022, we aim for spouses to benefit from CHI free of charge. Additional remuneration equal to one months salary was paid to all our employees and a wage increase was also delivered to employees to offset some of

the impacts of the current inflationary environment in Turkey.

We care about enriching the social lives of our employees. We organise outdoor events throughout the year and increase employee awareness by inviting NGO's to these events. In addition to social activities, we opened a sports hall, volleyball, basketball and tennis courts, green park area and social facilities for use by all our employees in 2021.

96% of our employees participated in our Human Resources Unit Satisfaction Survey, which we conducted in 2021, to measure employee satisfaction, with levels of satisfaction reported as 88%. (2020: 74.7%).

We encourage our employees and related stakeholders to participate in company decision-making processes and share their ideas and suggestions through the Employee, Supplier and Subcontractor Suggestion Form, HR WhatsApp line, Employee Satisfaction Survey and Unit Satisfaction Survey channels. We evaluate all incoming requests and suggestions and provide feedback. In 2021, seven out of the nine suggestions received from the employees were implemented. In 2022, we plan to establish a Communications Board in order to increase the internal communication and provide greater transparency around ideas, suggestions and employee demands, as well as to evaluate and resolve topics raised.

OCCUPATIONAL HEALTH AND SAFETY

We consider providing a safe and healthy working environment a fundamental responsibility. We created our strategy for occupational health and safety within the framework of ISO 45001 Occupational Health and Safety Management System, ISO 31000 Risk Management System and the Occupational Health and Safety Policy of Eti Soda, following the current legislation and regulations.

[Click here](#) for the Eti Soda A.Ş. Occupational Health and Safety Policy.



There are two OHS Committees operating at Eti Soda: Regulatory OHS Committee and OHS Managers Committee. The OHS Committees have 42 members and the number of employee representatives is 20. Employee representatives on the committees are encouraged to ensure that all employees participate in occupational health and safety processes. All decisions taken by the committees are published openly on bulletin boards and on our intranet systems.

To avoid overlooking any potential risks, the Eti Soda Risk Committee carries out risk assessment analysis. In 2021, the risk assessments of the Warehouse, Energy Production and Mechanical

Maintenance units were renewed. In addition, a separate risk assessment was made for our employees in the special working group.

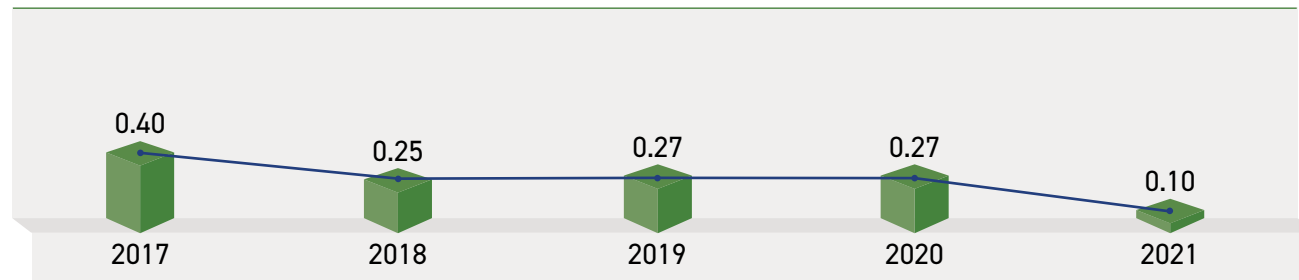
Near-miss reports, occupational hazards and non-compliance in our facilities are reported to the Regulatory OHS Committee. All notifications are evaluated by the Committee and necessary precautions are taken. In 2021, 16 near-miss notifications were made. As a result of the controls carried out by the OHS unit and employee notifications, non-conformities can be detected and work programmes are then created to follow-up and eliminate identified nonconformities.

REWARD / DISCIPLINARY PRACTICE

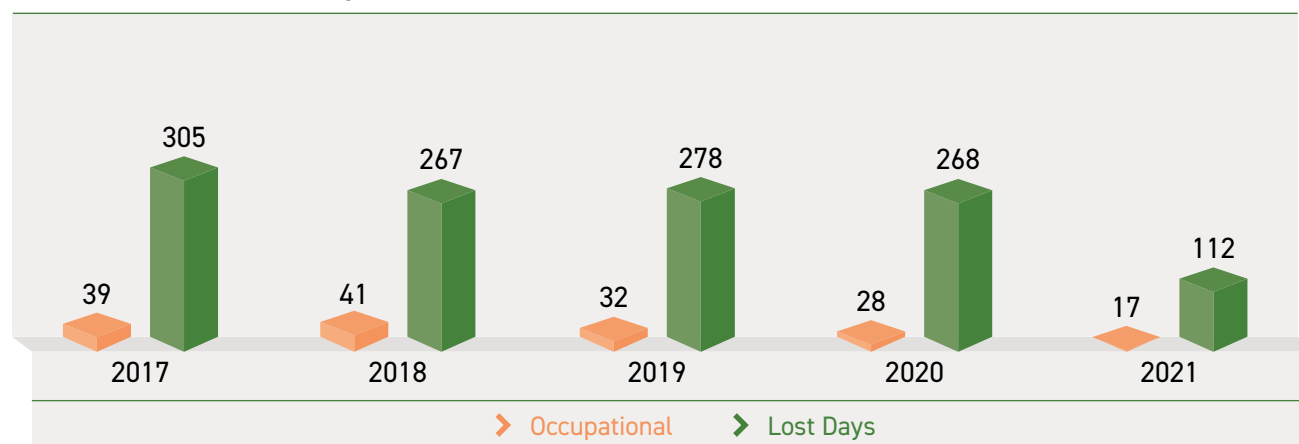
The Occupational Health and Safety Unit implements a reward and disciplinary system in order to create a safety first OHS culture and to prevent OHS risks more comprehensively through increased employee participation in occupational safety-oriented practices. Thanks to this system, we achieved an active participation of employees in OHS processes and an increased number of employees reporting dangerous situations.

In 2021, there were no fatal occupational accidents at Eti Soda. The accident severity rate was 0.27 with 27 work accidents in 2020, the accident severity rate was 0.10 with 17 work accidents in 2021. 17 work accidents caused 112 workdays lost. Injuries caused by hand tool injuries, equipment strikes and burns accounted for 67% of occupational accidents.

Accident Severity Rate Year on Year



Occupational Accidents Year on Year Lost Time Distribution



In 2021, compulsory Occupational Health and Safety Training was held online due to the pandemic, and 12,163.75 person*hours of training was delivered.



Eti Soda employs one full-time occupational physician, a patient transport ambulance and driver, along with five full-time health workers who provided infirmary services. A psychosocial risk analysis study will be carried out by the occupational physician in 2022, to identify potential psychological disorders that may occur in employees.

EMERGENCY MANAGEMENT

Emergency management procedures at Eti Soda, are governed by the Emergency and Actions Procedure, Emergency Action Plan and Emergency Plan Crisis Management Board.

We carried out three planned emergency drills across all shifts in 2021. In advance of the drills, employees were informed about the emergency drill scenario. During the period, 35 employees and 336 subcontractor employees were given two-hour training by the Disaster and Emergency Management Presidency (DEMP).

COMBATING COVID-19

Eti Soda has the Turkish Standards Institute ("TSI") Safe Service Certificate. Human Resources,

Occupational Health and Safety and Administrative Affairs Units implemented measures against the Covid-19 pandemic. During the period:

- › We carried out works on the cafeteria seating arrangements, factory-wide hygiene and sanitation studies, and the disinfection of service vehicles and company vehicles, in line with the decisions taken by the Ministry of Health.
- › Our Occupational Health and Safety, Administrative Affairs and Purchasing Units ensured the provision and distribution of all the necessary materials for hygiene and sanitation for our employees.
- › The Human Resources Unit informed employees about various Covid-19 related matters through SMS and e-mails, to increase their awareness on the matter.



SOCIAL INVESTMENTS

We aim to contribute to the social and economic development of the Ankara Beypazarı region, where we operate, and the surrounding villages of Bağözü, Çakıloba and Başören. In line with this, we identify needs and expectations of local governments, local communities and people through the transparent and trust-based communication methods which we have established and we develop social responsibility and infrastructure projects to meet these expectations and needs.

Thanks to solution extraction technology, we use only about 2% of the 8 km² mining area in which we operate. Therefore alongside our commercial operations, social and agriculture activities within our neighbouring local communities, continue as normal.

In addition to the landscaping of the villages around our facilities, opening water wells, carrying out construction works such as roads and canals; we also provided financial support for equipment. This is used in fabricating wire mesh fencing, for the protection of agricultural activities and to repair and maintain the barrier used by the villagers to protect their crops or livestock.

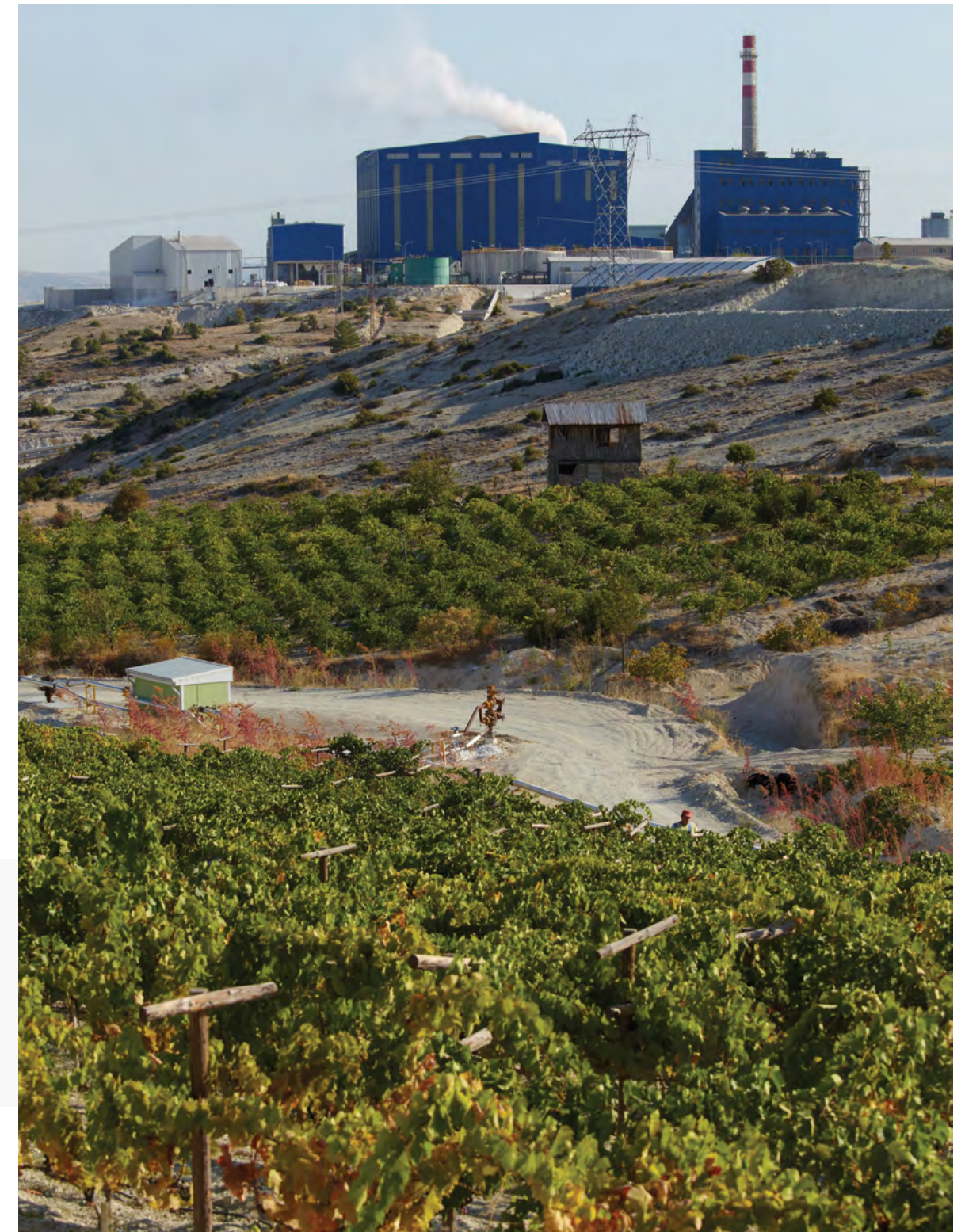
We provide financial assistance for the landscaping, maintenance and renovation works of many schools affiliated with the Beypazarı National Education Directorate. We also provide scholarships to approximately 30 university students living in the Beypazarı region. We donated 1,494 books to the Book Collection Campaign during 2021, in order to meet the needs of the schools in our district and to encourage good reading habits amongst the students.

We support sports and local arts by sponsoring the Beypazarı Municipality Youth and Sports Club Association and the annual Beypazarı Festival.

In order to strengthen engagement with the communities, we organise an Iftar that brings together the local people of Bağözü, Çakıloba and Başören villages, with the entire Eti Soda workforce every year in the month of Ramadan.



**We invested approximately
TL 3 million (USD 162,000) in
social investments 2021.**



PROJECT HIGHLIGHTS

ETİ SODA EXEMPLARY VINEYARDS

In 2009, we established vineyards in the vicinity of the Eti Soda topside facilities. Through this project, we aimed to develop viticulture skills in the region by providing training and support, encouraging the use of new grape varieties, constructing irrigation systems and grape molasses facilities, and providing irrigation water and electricity infrastructure for local vineyards. This also results in improved economic outcomes for local producers by encouraging transition to more modern viticulture methods. In these vineyards, we planted six different grape varieties, three of which are suitable for wine production and three of which are table grapes. The project was a finalist in the SEDEX Responsible Business Awards for Best Environmental Sustainability Programme in 2020.



GREENHOUSE GARDEN PROJECT

In 2021, we initiated the Greenhouse Garden Project, creating environmental and socio-economic value in cooperation with Ankara Metropolitan Municipality (ANFA). We provided support through land supply, ground excavation, hot and cold water and energy supply with our partner ANFA, giving a purchase guarantee for the products grown in the greenhouse. With this project, we aim to contribute to the socio-economic development of the local people by increasing the cultivation of vegetables, fruits and flowers in the Beypazarı region. In addition, the most important purpose of this project is to support the employment and empowerment of women from the local communities. From an environmental point of view, it has enabled us to recycle excess condensate water and waste steam produced in our facility in the greenhouse.

MOLASSES PRODUCTION SITE IN BAĞÖZÜ AND ÇAKILOBA VILLAGES

In the villages of Bağözü and Çakıloba, where viticulture activities are common, we built a molasses boiling plant, which is owned and operated by the villagers. The 80m² reinforced concrete structure with squeezing, shredding, separating machines and four boilers, allows the villagers to make molasses from the grapes they produce and in turn create a further revenue stream from the vineyards.

IRRIGATION SYSTEM IN ÇAKILOBA AND BAŞÖREN VILLAGES

We established a 300m³ irrigation pool for agricultural irrigation and a hydrophore system, with approximately 8,000m of piping in the villages of Çakıloba and Başören. We supported the agricultural activities of the villages with a continuous supply of clean water from the facility to the pool. Thus, we were able to replace the well method irrigation system, which caused excessive water consumption and have, through this initiative, ensured the efficient use of water.

Volunteer Employee Activities

Our Measurement Control Unit shares informative and educational videos in English and Turkish on our YouTube channel, giving helpful tips and advice on specific system and machinery servicing and maintenance. Through these videos, we aim to contribute to the knowledge base within the sector and create a local resource library.

SPECIAL EDUCATION PRACTICE SCHOOL

We built the Eti Soda Special Education Practice School, with a capacity for 180 students, in accordance with European standards for students with special educational needs in the Beypazarı district of Ankara. We handed it over to the Ministry of National Education in 2017 and continue to support the school with regular visits. Thanks to this school, which hosts students from many districts of Ankara, we touch the lives of not only students but also their families. The school slogan is "happy children come from happy families". Since the care of students with special educational needs requires sensitivity and dedication, the time that families allocate for themselves decreases. Thanks to the project, it is possible for families to gain a little respite, making time for themselves while their children receive education from expert educators.

APPENDICES

INDEPENDENT ASSURANCE REPORT

Independent Assurance Opinion Statement

To the Management of Eti Soda Elektrik Üretim A.Ş.

Scope and Objectives :

BSI was commissioned by Eti Soda Elektrik Üretim A.Ş. (hereinafter “Eti Soda”) to conduct independent assurance of its Eti Soda 2021 Sustainability Report (‘the Report’), and to carry out an independent verification of total water withdrawal, recycled and discharger water, carbon emissions, health and safety performance indicators, employee distribution indicators, production and sales amounts, produced and used electricity, training man-hours and waste.

Our assurance engagement was planned and carried out in accordance with AA1000 Assurance Standard AA1000AS v3.

BSI’s approach

BSI’s assurance engagements are carried out in accordance with our verification procedure. Reviewing the data collection and consolidation processes used to compile selected data, including assumptions made, and the data scope and reporting boundaries; We planned and performed our work to obtain the evidence we considered necessary to provide a basis for our assurance opinion. We were engaged to provide Type 2 moderate level assurance, which covers:

- Evaluation of adherence to the AA1000AS v3 principles of inclusivity, materiality and responsiveness (the Principles); and
- The reliability of specified sustainability performance information along with related claims in the report including:
 - Desk review
 - Site visit
 - Data sampling
 - Reporting

Inclusivity, Materiality, Responsiveness and Impact principles;

Eti Soda has made a commitment to it’s stakeholders. The participation of stakeholders has been initiated in developing and achieving an accountable and strategic response to Sustainability Report.

Eti Soda publishes Sustainability Report information that enables its stakeholders to make informed judgments about the company’s management and performance. In our professional opinion the report covers the Eti Soda’s materiality issues.

Eti Soda has implemented the practice to respond to the expectations and perceptions of its stakeholders.

Assurance level

The moderate level assurance provided is in accordance with AA1000 Assurance Standard v3 in our review, as defined by the scope and methodology described in this statement.

Independence/Responsibilities of Eti Soda and of the Assurance Providers

BSI was not involved in collecting and calculating data, or in the development of the Report. BSI’s activities are independent from Eti Soda. Eti Soda has sole responsibility for preparation of the Report. In performing our assurance work, our responsibility is to the management of Eti Soda.

The assurance team was composed of Lead auditors and Carbon Footprint Verifiers experienced in industrial sector, and trained in a range of sustainability, environmental and social standards including AA1000AS, ISO 14001, ISO 45001, and ISO 9001, EU ETS, GS, VCS, ISO 50001 etc. BSI is a leading global standards and assessment body founded in 1901. The assurance is carried out in line with the BSI verification procedure. There is no limitation.

BSI’s Opinion

Based on BSI’s approach, we believe that Eti Soda A.Ş. has:

- Met the requirements above
- Disclosed accurate and reliable data and information

Verified Data

Water consumption: 3,419,308 m3

Direct water intensity: 1,75 m3/ton product

Recycled water: 753.629 m3

Recycled water ratio: 22,04%

Domestic discharged water: 57,918 m3

Industrial discharged water: 673,968 m3

Production volume: 1,952,000 ton

Net product sales: 1,960,301 ton

Electricity production: 89.797.956 kWh

Electricity consumption (from the grid): 498,212,620 kWh

Training man-hour: 16970 man*hour

Hazardous waste: 49,06 ton

Medical waste: 0,08 ton

Fly ash and Slag: 139,262 ton

Scrap Waste: 88,7 ton

INDEPENDENT ASSURANCE REPORT

Packaging Waste: 135,3 ton

Recycled Materials

Plastic: 122,840 ton

Paper and board: 7,080 ton

Glass: 2,280 ton

Metal: 87,040 ton

CO2 Emissions

Scope 1: 464,688 tCO₂e.

Scope 2: 215,648 tCO₂e.

Scope 3: 337,747 tCO₂e.

Emission intensity (Scope 1 + 2/ production amount): 0.349 tCO₂e/ton product

AFR - Accident Frequency Rate: 16

AIR - Accident Incidence Rate: 3.069

ASR - Accident Severity Rate: 0.10

LTIR- Lost Time Injury Frequency Rate: 13

Headcount (Total employee number):593

Employee Distribution According to Gender: 525 male 68 female

Employee Distribution According to Contract Type: 593 indefinite-term employment contract

Employee Distribution According to their Status (Blue collar/white collar)

white collar: 162 blue collar:431

Employee Distribution According to Age Group

Younger than 30: 158

Between 30-50: 403

Older than 50: 32

Number of Senior Managers

Female: 2

Male: 8

Number of disabled employees: 17

Number of employees hired: 51

Number of employees left: 27

Number of employees on Maternity/Paternity Leave

Female: 2

Male: 31

Number of employees returned from Maternity/Paternity Leave

Female: 2

Male: 31

Number of employees who returned after maternity/paternity leave and continued to work for minimum 12 months

Female: 2

Male: 31

The opinion expressed is formed on the basis of a moderate level of assurance and at the materiality of the professional judgement of the verifier.

Mehmet Kumru

GHG Products Champion IMETA Region

Date: 23 September 2022





AA1000
Licensed Assurance Provider
258

BSI Group Eurasia Belgelendirme Hizmetleri Ltd. Şti.

Değirmen Sokak, No:16, Ar Plaza, Ofis: 61/62 A Blok, Kozyatağı / İstanbul

PERFORMANCE INDICATORS

ECONOMIC PERFORMANCE INDICATORS

	2017	2018	2019	2020	2021
Production and Sales Data (tonnes)					
Production Volume	1,670,000	1,817,000	1,860,000	1,763,000	1,952,000
Net Product Sales	1,666,443	1,822,841	1,825,928	1,772,905	1,960,301
Sales by Region					
Turkey	617,463	660,307	494,234	451,566	531,900
Europe	710,817	602,635	607,809	722,435	785,444
Other	338,163	559,899	723,885	598,904	642,957
Sales by Product Group					
Dense Soda Ash	1,506,822	1,626,375	1,662,155	1,561,000	1,744,500
Sodium Bicarbonate	163,178	190,625	197,845	202,000	207,500
Other Financial Data					
Total Current Liabilities (€m)	222.23	157.83	171.11	273.28	227.32
Total Liabilities (€m)	284.01	177.27	189.51	289.29	229.61
Equity (€m)	251.27	206.58	228.10	343.75	168.55
Dividends Paid (€m)	90.33	43.61	142.18	0.80	79.68
Investment Expenditures (€m)	39.81	24.34	11.83	6.09	5.21
Dividends (€m)	105.12	131.2	154.21	147.51	81.66
Personnel Expenses (million TL)	38.03	45.39	56.27	69.18	86.29
Corporate Tax Paid to the Government (million TL) *	32.14	65.92	88.72	159.60	305.65
Social Responsibility Projects (million TL)	2.05	3.17	1.65	2.21	2.82

* Accrual + investment allowance withholding included

SOCIAL PERFORMANCE INDICATORS

Employee Demography	2017	2018	2019	2020	2021
Total number of employees	505	516	572	575	593
Female	50	53	55	66	68
Male	455	463	517	509	525
Total number of employees by category					
White-Collar	107	115	140	143	162
Blue-Collar	398	401	432	432	431
Total number of employees by age group					
18-30	143	132	416	418	158
30-50	341	364	150	152	403
50 +	21	20	6	5	32
Number of senior managers					
Female			1	1	2
Male			7	8	8
Number of disabled employees	18	17	17	16	17

SOCIAL PERFORMANCE INDICATORS

Turnover	2017	2018	2019	2020	2021
Number of employees hired			56	33	51
Number of employees left			30	31	27
Number of employees on maternity/paternity leave					
Female			2	4	2
Male			24	35	31
Number of employees returned from maternity/paternity leave					
Female			2	4	2
Male			24	35	31
Number of employees who returned after maternity/paternity leave and continued to work for minimum 12 months					
Female			2	4	2
Male			24	35	31
Employee Development	2017	2018	2019	2020	2021
Employee Training- Total Hours (person*hours)	10,920	18,143	27,647	3,414	16,970
Occupational Health And Safety	2017	2018	2019	2020	2021
Accident Weight Ratio (Total number of lost days due to accident / Total number of person hour x 1000)	0.4	0.25	0.27	0.27	0.1
Accident Frequency Rate (Total number of accidents / Total number of person hour x 1,000,000)	39	29	25	27	16
Occupational Accident Probability Rate (Total Number of Accidents / Total Number of Employees x 100,000)	8,216	6,166	5,243	4,918	3,069
Lost Time Injury Frequency Rate (Number of lost time injuries / Total number of person hour x 1,000,000)	31	21	17	22	13
OHS Training- Total Hours (person*hour)	5,120	11,028	13,070	698	12,163.75

ENVIRONMENTAL PERFORMANCE INDICATORS

GHG Emissions	2012	2018	2019	2020	2021
Scope 1 (tonne CO ₂ e)	470,750	441,892	437,184	435,145	464,688
Scope 2 (tonne CO ₂ e)	192,606	227,166	218,181	207,550	215,648
Scope 3 (tonne CO ₂ e)	-	123,613	119,937	103,056	337,747*
Carbon Emissions Density (Scope 1+2 tonne CO ₂ e/tonne production)	0.649	0.368	0.352	0.365	0.349
Energy	2018	2019	2020	2021	
Electricity generation (KWh)		61,412,009	93,572,582	82,905,604	89,797,956
Total net electricity consumption (KWh)**		509,199,345	474,604,127	451,676,937	498,212,620
Total steam consumption (TOE)***		68,238	69,878	64,590	68,735
Total energy consumption (TOE)***		130,732.68	128,146,46	121,082	128,967
Total energy density (TOE***/tonne production)		0.0719	0.0689	0.0687	0.0661
Water Consumption	2018	2019	2020	2021	
Total water withdrawal (m ³)		3,039,140	2,989,875	3,185,567	3,419,308
Amount of water recycled and reused (m ³)		753,829	713,854	675,339	753,629
Recycled and reused water rate (%)		24.80	23.88	21.20	22.04
Industrial wastewater discharge (m ³)		532,727	505,297	588,976	673,968
Domestic wastewater discharge (m ³)		21,155	35,305	34,683	57,918
Water density (Total water withdrawal m ³ /tonne production)		1.67	1.61	1.81	1.75

*Calculated in 2021 according to the 2018 version of the ISO 14064 standard in 2021 and scope 3 emissions were reviewed in detail.

** The amount of electricity purchased from the grid.

***Tonne of equivalent oil

ENVIRONMENTAL PERFORMANCE INDICATORS

WASTE (tonnes)		2018	2019	2020	2021
Hazardous		40.46	42.4	91.69	49.06
	Medical waste	0.04	0.05	0.08	0.08
Non-Hazardous					
	Fly ash and slag	131,421	115,584	128,227	139,262
	Scrap waste	837.03	503.39	164.86	88.7
	Packaging waste	15	19.74	148.14	135.3
Amount of Waste Recycled					
	Plastics	218.54	151.19	146.56	122.84
	Paper-cardboard	5.78	6.47	7.56	7.08
	Glass	1.66	1.52	7.82	2.28
	Metal	26.05	363.6	152.3	87.04
Hazardous Wastes**** by Disposal Method (tonnes)		2018	2019	2020	2021
Incineration		-	0.03	0.08	0.07
Recycling of waste by other processes		0.30	0.74	0.96	15.8
Intermediate storage		32	33,340	46,127	19,420
Landfill		-	-	-	-
Reclamation of metals		3.2	6.02	9.06	6.42
Reuse of oils		4.82	2.30	35.54	7.42

**** Our hazardous wastes are delivered to licensed companies in order to be disposed of in the most appropriate way and to minimise the damage to the environment.

Non-Hazardous Wastes by Disposal Method (tonnes)		2018	2019	2020	2021
Incineration		-	0.02	0.01	0.02
Recycling of waste by other processes		4,710	1,274	270	93
Intermediate storage		-	3,900	1,760	4,580
Landfill		-	78,852	67,032	70,272
Reclamation of metals		24,395	35,980	61,194	68,881
Reuse of oils		-	-	45.52	130.76
Pollutant Load Chemical Oxygen Demand (COD) (tonne/year)		2018	2019	2020	2021
Domestic treatment		2.4	3.22	2.84	3.73
Industrial treatment		64.99	30.32	76.12	49.2

102-10,102-55

GRI CONTENT INDEX



Disclosures	Descriptions and Page Numbers
GRI 101: Foundation 2016	
GRI 102: General Disclosures 2016	
Corporate Profile	
102-1	About Report p.3
102-2	About Eti Soda p.8-9
102-3	Contact: Inside Back Cover
102-4	About Eti Soda p.8
102-5	About Eti Soda p.8
102-6	About Eti Soda p.8 ; Operations p.72-73
102-7	About Eti Soda p.8
102-8	Social Performance Indicators p.99-100
102-9	Operations p.72-73
102-10	GRI Content Index: During the reporting period, there was no significant change in the operational or financial structure and supply chain of the company.
102-11	Risk Management p.20-21
102-12	Memberships and Supported Initiatives p.26-27
102-13	Memberships and Supported Initiatives p.26-27
Strategy	
102-14	Message from the Executives p.4-7
102-15	Risk Management p.20-21
Ethics and Integrity	
102-16	Business Ethics and Anti-Corruption p.23-25
102-17	Business Ethics and Anti-Corruption p.23-25

102-41,102-48,102-51,102-52

Governance	
102-18	Corporate Governance p.18-19
102-19	Corporate Governance p.17; Sustainability Management p.28-29
102-20	Sustainability Management p.28-29
102-21	Stakeholder Engagement p.36-37
102-29	Risk Management p.20
102-30	Risk Management p.20
102-31	Risk Management p.20
102-32	Sustainability Management p.28
102-35	Working Life at Eti Soda p.78
Stakeholder Engagement	
102-40	Stakeholder Engagement p.37
102-41	GRI Content Index: The right to unionize at Eti Soda is free for all employees. All employees at all levels have the right to collective bargaining and are constantly informed about the issue.
102-42	Stakeholder Engagement p.36-37
102-43	Stakeholder Engagement p.36
102-44	Stakeholder Engagement p.37
Reporting Practices	
102-45	About Report p.3
102-46	About Report p.3
102-47	Sustainability Management p.29
102-48	GRI Content Index: None
102-49	About Report p.3
102-50	About Report p.3
102-51	GRI Content Index: The report is Eti Soda's third Sustainability Report.
102-52	GRI Content Index: Annual reporting.
102-53	About Report p.3
102-54	About Report p.3
102-55	GRI Content Index p.104
102-56	Independent External Audit Report p.94

For the Materiality Disclosures Service, GRI Services reviewed that the GRI content index is clearly presented and the references for Disclosures 102-40 to 102-49 align with appropriate sections in the body of the report.

Material Issues		
Standard	Disclosures	Descriptions and Page Numbers
Ekonomik Performans		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	About Eti Soda p.8-9 ; Operations p.72-73
	103-2 The management approach and its components	About Eti Soda p.8-9 ; Operations p.72-73
	103-3 Evaluation of the management approach	About Eti Soda p.8-9 ; Operations p.72-73
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Economic Performance Indicators p.98
Sustainable Economic Growth		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	About Eti Soda p.8-9 ; Operations p.72-73
	103-2 The management approach and its components	About Eti Soda p.8-9 ; Operations p.72-73
	103-3 Evaluation of the management approach	About Eti Soda p.8-9 ; Operations p.72-73
Anti-Corruption		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Business Ethics and Anti-Corruption p.23-25
	103-2 The management approach and its components	Business Ethics and Anti-Corruption p.23-25
	103-3 Evaluation of the management approach	Business Ethics and Anti-Corruption p.23-25
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Business Ethics and Anti-Corruption p.24-25
	205-2 Communication and training about anti-corruption policies and procedures	Business Ethics and Anti-Corruption p.23-24
	205-3 Confirmed incidents of corruption and actions taken	GRI Content Index: There was no case of corruption in the reporting period.
Climate Change Risk and Opportunity Analysis		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Risk Management p.20-21
	103-2 The management approach and its components	Risk Management p.20-21
	103-3 Evaluation of the management approach	Risk Management p.20-21
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	Risk Management p.21
Stakeholder Communication and Engagement		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Stakeholder Engagement p.36-37
	103-2 The management approach and its components	Stakeholder Engagement p.36-37
	103-3 Evaluation of the management approach	Stakeholder Engagement p.36-37

Supplier's Environmental and Social Compliance		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Responsible Supply Chain p.74-75
	103-2 The management approach and its components	Responsible Supply Chain p.74-75
	103-3 Evaluation of the management approach	Responsible Supply Chain p.74-75
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Responsible Supply Chain p.75
	414-2 Negative social impacts in the supply chain and actions taken	Responsible Supply Chain p.74-75
Impact on Local Community		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Stakeholder Engagement p.36; Social Investments p.88-91
	103-2 The management approach and its components	Stakeholder Engagement p.36; Social Investments p.88-91
	103-3 Evaluation of the management approach	Stakeholder Engagement p.36; Social Investments p.88-91
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Social Investments p.88-91
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Social Investments p.88-91
	413-2 Operations with significant actual and potential negative impacts on local communities	Stakeholder Engagement p.36
Customer Privacy		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Information Security p.55
	103-2 The management approach and its components	Information Security p.55
	103-3 Evaluation of the management approach	Information Security p.55
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	GRI Content Index: There was no case of violation of the confidentiality of customer information in the reporting period.
Energy Management		
GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Energy and Emission Management p.62-63
	103-2 The management approach and its components	Energy and Emission Management p.62-63
	103-3 Evaluation of the management approach	Energy and Emission Management p.62-63
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy and Emission Management p.63; Environmental Performance Indicators p.101
	302-3 Energy intensity	Energy and Emission Management p.63; Environmental Performance Indicators p.101
	302-4 Reduction of energy consumption	Energy and Emission Management p.63
	302-5 Reductions in energy requirements of products and services	Environmental Performance Indicators p.101

Water Management

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Water Management p.60-61
	103-2 The management approach and its components	Water Management p.60-61
	103-3 Evaluation of the management approach	Water Management p.60-61
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Water Management p.60-61
	303-2 Management of water discharge-related impacts	Water Management p.60-61
	303-3 Water withdrawal	Water Management p.61; Environmental Performance Indicators p.101
	303-4 Water discharge	Water Management p.61; Environmental Performance Indicators p.101
	303-5 Water consumption	Environmental Performance Indicators p.101

Biodiversity

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Biodiversity p.68-69
	103-2 The management approach and its components	Biodiversity p.68-69
	103-3 Evaluation of the management approach	Biodiversity p.68-69
GRI 304: Biodiversity 2016	304-2 Significant impacts of activities, products, and services on biodiversity	Biodiversity p.68-69
	304-3 Habitats protected or restored	Biodiversity p.68-69

Greenhouse Gas Emissions

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Energy and Emission Management p.64-65
	103-2 The management approach and its components	Energy and Emission Management p.64-65
	103-3 Evaluation of the management approach	Energy and Emission Management p.64-65
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Energy and Emission Management p.64; Environmental Performance Indicators p.101
	305-2 Energy indirect (Scope 2) GHG emissions	Energy and Emission Management p.64; Environmental Performance Indicators p.101
	305-3 Other indirect (Scope 3) GHG emissions	Energy and Emission Management p.64; Environmental Performance Indicators p.101
	305-4 GHG emissions intensity	Energy and Emission Management p.64; Environmental Performance Indicators p.101
	305-5 Reduction of GHG emissions	Energy and Emission Management p.65

Waste Management

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Waste Management p.66-67
	103-2 The management approach and its components	Waste Management p.66-67
	103-3 Evaluation of the management approach	Waste Management p.66-67
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste Management p.66-67
	306-2 Management of significant waste-related impacts	Waste Management p.66-67
	306-3 Waste generated	Environmental Performance Indicators p.102
	306-5 Waste directed to disposal	Environmental Performance Indicators p.102-103

Environmental and Social Compliance

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Environmental Management p.60-61; Product Quality and Safety p.40; Responsible Supply Chain p.74; Working Life at Eti Soda p.78; Occupational Health and Safety p.83
	103-2 The management approach and its components	Environmental Management p.60-61; Product Quality and Safety p.40; Responsible Supply Chain p.74; Working Life at Eti Soda p.78; Occupational Health and Safety p.83
	103-3 Evaluation of the management approach	Environmental Management p.60-61; Product Quality and Safety p.40; Responsible Supply Chain p.74; Working Life at Eti Soda p.78; Occupational Health and Safety p.83
GRI 307: Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	GRI Content Index: There was no non-compliance with environmental laws and regulations during the reporting period.
GRI 419: Socioeconomic Compliance 2016	419-1 Non-compliance with laws and regulations in the social and economic area	GRI Content Index: There was no non-compliance with laws and regulations in the social and economic fields during the reporting period.

Employment

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Working Life at Eti Soda p.78-79
	103-2 The management approach and its components	Working Life at Eti Soda p.78-79
	103-3 Evaluation of the management approach	Working Life at Eti Soda p.78-79
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Social Performance Indicators p.100
	401-3 Parental leave	Social Performance Indicators p.100
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Corporate Governance p.16
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Corporate Governance p.16

Diversity and Inclusion

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Working Life at Eti Soda p.78-79
	103-2 The management approach and its components	Working Life at Eti Soda p.78-79
	103-3 Evaluation of the management approach	Working Life at Eti Soda p.78-79
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Working Life at Eti Soda p.78-79; Social Performance Indicators p.99
	405-2 Ratio of basic salary and remuneration of women to men	GRI Content Index: There is no gender-based salary difference at Eti Soda. The principle of equal pay for equal work is applied.
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	GRI Content Index: There were no cases of discrimination during the reporting period.

Employee Development and the Workplace

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Working Life at Eti Soda p.80-81
	103-2 The management approach and its components	Working Life at Eti Soda p.80-81
	103-3 Evaluation of the management approach	Working Life at Eti Soda p.80-81
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Working Life at Eti Soda p.80
	404-2 Programs for upgrading employee skills and transition assistance programs	Working Life at Eti Soda p.80-81
	404-3 Percentage of employees receiving regular performance and career development reviews	Working Life at Eti Soda p.81

Occupational Health and Safety

GRI 103: Management Approach 2016	103-1 Explanation for reporting the management approach	Occupational Health and Safety p.83-84
	103-2 The management approach and its components	Occupational Health and Safety p.83-84
	103-3 Evaluation of the management approach	Occupational Health and Safety p.83-84
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Occupational Health and Safety p.83
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety p.83
	403-3 Occupational health services	Occupational Health and Safety p.84
	403-4 Worker participation, consultation, and communication on occupational health and safety	Occupational Health and Safety p.83
	403-5 Worker training on occupational health and safety	Occupational Health and Safety p.84; Social Performance Indicators p.100
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health and Safety p.83
	403-9 Work-related injuries	Occupational Health and Safety p.84; Social Performance Indicators p.100

CONTACT

Headquarters

Yeşilağaç Mah. Gurağaç Kümeevler No:47/A
06730 Beypazarı / ANKARA

P: +90 312 763 38 01
F: +90 312 763 38 02
E-mail: etisoda@etisoda.com

Sales

Paşalimanı Caddesi No:41 34674
Üsküdar / ISTANBUL

P: +90 216 531 24 00
F: +90 216 531 25 40
E-mail: sales@etisoda.com

Reporting Consultant & Design



www.kiymetiharbiye.com

LEGAL DISCLAIMER

This Sustainability Report ("Report") prepared by Eti Soda Üretim Pazarlama Nak. ve Elektrik Üretimi San. ve Tic. A.Ş. ("Eti Soda") was published solely for information and it is not intended for providing a basis for any investment decision. The information in the Report exclusively contains prospective statements, forecasts, and projections. As of the period of reporting, all information contained in the report and associated documentation are believed to be true and accurate whereas such information and documentation are disclosed in good faith. Eti Soda does not accept any responsibility for any mistakes that may occur during the writing and printing stages. Eti Soda does not make any representation, warranty, or commitment under any title whatsoever based on the information contained in the report. Eti Soda and/or their respective executive board members, consultants and employees of the company shall not be held liable against any direct or indirect damages or loss incurred by any party arising out of or in connection with any information regardless of whether such information is contained in this Report.

**ETİ SODA
SUSTAINABILITY
REPORT 2021**



ETI SODA[®]