
ETI SODA SUSTAINABILITY REPORT

2019–2020



Contents





About the Report

The 2nd sustainability report of Eti Soda covers the 2019 and 2020 financial years. It evaluates the sustainability performance of Eti Soda Üretim Pazarlama Nak. ve Elektrik Üretimi San. ve Tic. A.Ş.. Eti Soda sustainability reports are prepared biennially, and the previous report belongs to the financial years of 2017 and 2018.

Eti Soda was founded in Beypazarı in the city of Ankara, Turkey. Eti Soda is one of Turkey's most successful public-private partnerships, with 74% and 26% of its shares owned by Ciner Group and Eti Maden İşletmeleri A.Ş., respectively.

Eti Soda is one of the biggest chemical exporters in Turkey, offering sodium carbonate (soda ash) and sodium bicarbonate products to the world market. **The report includes the social, environmental, and financial impacts of soda ash and sodium bicarbonate production at Eti Soda and the goals set and governance progress.**

This report has been prepared in accordance with the GRI Standards: Core option. External assurance has been obtained from independent institutions for the data shared within the report's water footprint, carbon footprint, LCA, and EPD studies.

Messages from the Executives

Message from Eti Soda Chairman of the Board and CEO



“...We will pave the way for a greener, more sustainable industry hand in hand with the whole world.”

Dear Stakeholders,

We went through the most challenging two years together with the whole world. Families, communities, and businesses faced many hardships. Eti Soda was not an exception in terms of struggling. However, we managed to overcome the difficulties through our clear and effective strategies.

From employees to shareholders, all our stakeholders create a different set of values that keeps Eti Soda strong and standing. That's why I think it is crucial to target the best practices that will result in the most convenient outcomes socially, economically, and environmentally.

Sustainability is a must in this era, and I am proud to say that we have already made sustainability a habit of ourselves. While we still have a lot to accomplish due to the modern world's fast-paced nature and continuing deterioration of the planet, we strive to build up our strong base and grow even more.

I believe solution mining technology is a unique innovation for the soda ash industry and a great success for us. However, it would be deceptive to tie all our achievements to this. Technology and innovation are tools for us to be better as we aim at our best.

Our operating standards are set to be the best in our industry because we produce and supply the highest quality product for our global customer base in an environmentally and socially responsible way with a highly reliable global supply chain. What makes Eti Soda ecologically and socially responsible? We manage all our production processes with the human factor in our minds. We have a mission to support natural production, which we produce with solution mining technology that minimizes the impact on the environment by respecting the dynamics of the local people within our sphere of influence. We

meet regularly with local people and neighborhood representatives to ensure their voices are heard and needs are met. We gather information about their priorities when it comes to the social development of the village, providing them with facilities and farmlands that result in an environmentally and economically better way of living.

Our focus is always on transparency, integrity, and responsible business practices. We value building long-standing partnerships with our distributors, customers, and other stakeholders. When it comes to the workforce, I believe the best people work in the best places as Eti Soda. We aim to attract, develop and retain the best people; we form a company culture where people work with motivation and purpose, build their skills accordingly, and contribute to the vibrant performance culture.

As Eti Soda, we dream of mutual growth with everyone we impact. We count communities in which we operate as our own. We provide support and resources to the communities to foster cooperation, development, and economic independence.

This report reveals all our achievements from the past and all our commitments for the future. At Eti Soda, we will pave the way for a greener, more sustainable industry hand in hand with the whole world. On behalf of the Eti Soda family, I would like to thank all our stakeholders for their support, contribution, and suggestions throughout this journey.

Gürsel Usta
Chairman of the Board & CEO

Messages from the Executives

Message from Eti Soda Member of the Board & General Manager



“...greater the power we have, greater the impact we will have”

Dear Stakeholders,

As we leave two more years behind with financial success, I would like to look back on what we have achieved as Eti Soda and thank all people who have been a part of this journey. This time, we have gone through struggles that no one would guess. We faced the Covid-19 pandemic crisis, which has disturbed the economy, on top of the ongoing economic fluctuations.

Fortunately, we made an even more successful business out of this struggle with our effective management process. Our world is changing, and we are part of this change; we are fueling, affecting, and affected by it. The important thing is keeping the balance and respecting the world around us while encouraging positive change.

In the year of 2009, Eti Soda emerged as a new player in a market that is widely stable where there are almost no new facilities or brands in the past 20 years, with a deep-seated customer base.

As a new player in the market, we had to prove our work to the whole world. We have always made quality our priority, both in products and services. We gained experience by following the right strategies, correcting our mistakes on time, and accurately analyzing the expectations of suppliers and customers, which form the basis of the value chain. Eventually, global companies became loyal customers due to our product quality and continuity. From the first day onwards, we continue to produce high-quality products. As well as the production process that we carry out with natural raw materials and reliable methods, the trust of our stakeholders in our command of business that we have advanced over the years makes us stand out in this sector.

The success and reliability of Eti Soda come first and foremost from its respect for the environment.

Thanks to the solution mining technology, while we continue our production underground, social life, agriculture, animal husbandry, etc., can be continued over the ground. We are giving back to the local community and putting all our efforts into mutual growth.

At Eti Soda, we make local and global commitments for a socially, economically, and environmentally sustainable world. We became a UNGC signatory in 2020 and actively engaged with UN Global Compact Principles in our business practices such as supporting human rights, abolition of forced and child labor, encouraging environmentally friendly technologies, and anti-corruption. Our solution mining technology, strictly implemented anti-corruption, modern slavery, and human trafficking policies, respect, and support given to local people and employees work as a pledge to our commitment to 10 Principles. In 2021, we have initiated the application process for the Science Based Targets initiative and CEO Water Mandate. The Science Based Targets Initiative will provide us with a clear path to reducing carbon emissions in line with the Paris Agreement. We could take action by defining emission reduction targets based on the guidance of SBTi. On the other hand, we will report our water performance following the six elements of the UNGC CEO Water Mandate. We are improving our business every day and pushing the limits to contribute to society and the environment. I know that the greater the power we have, the higher the impact we will have. Thus, we plan on growing with our communities, enhancing our positive impact even more.

Our journey continues. I would like to thank all stakeholders for making Eti Soda possible.

Mustafa Tanzer Ergül
Member of the Board & General Manager

Message from a Stakeholder



“...helping us and our country be more productive, efficient, and economically independent..”

Dear Friends,

As the neighborhood representative, I am honored to have this chance to reflect on our experience with Eti Soda. In a village, you produce more than you consume. That's why we needed improvements to develop our agricultural activities and make our lives easier. At first, a large facility near our settlement worried us. We understood before long that Eti Soda is a company that cares for people and the environment.

Eti Soda has been responsible for many initiatives around our village and everywhere it has an impact. They have created employment opportunities for the needs of local people. Women's employment has risen significantly thanks to their initiatives. The village has a general water scarcity caused by drought. Eti Soda, as an environmentally conscious company, not only responsibly manages its operations but also provides solutions for the village's problems. They also established the entire irrigation system for the field.

We are feeling safe, and we know that our voice is heard. We can contact top management face to face whenever we want. We know that Eti Soda cares about stakeholder communication, which includes us. Even though they have the right to the land within our settlement, they let us use it for our agricultural works gratuitously. The company introduced electricity for the vineyard. They built the community house and a specific kitchen for molasses production, which occupies an important place in the local economy. Thanks to Eti Soda, we are much more efficient and independent in our production processes.

Eti Soda takes responsibility for its operations, ensuring a safe workplace, a natural process of soda ash production that does not disturb the environment, and efficient water management, which also provides for our village. We are glad that they are here, helping us and our country be more productive, efficient, and economically independent and develop socially.


We feel like we are a part of Eti Soda, and thank them for making a great and responsible business possible.

Kazım Uysal
Neighborhood Representative of Çakıloba Village

Eti Soda at a Glance

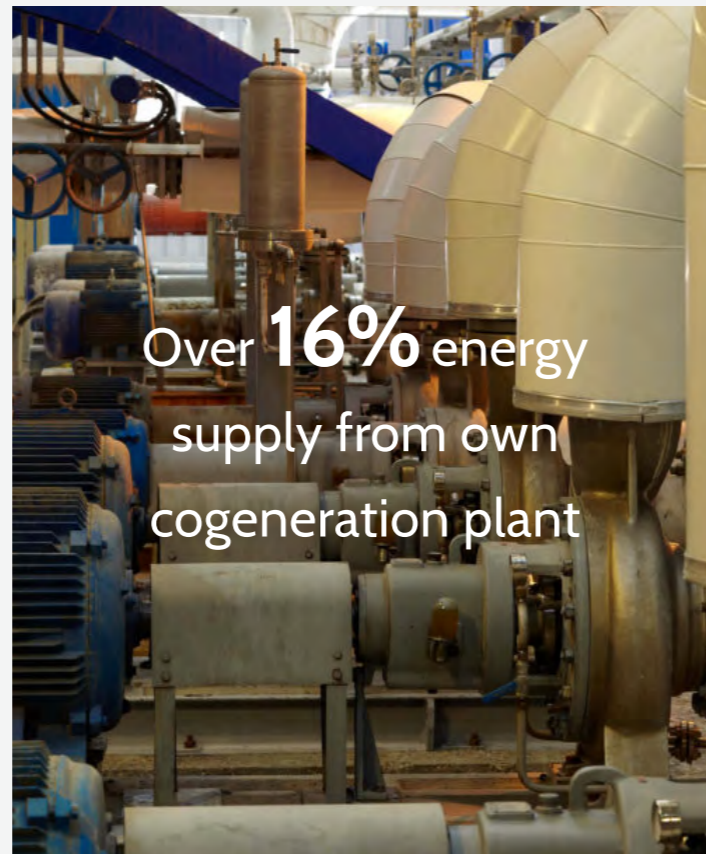
The first facility to use innovative
“solution mining” technology in the world

8 km²
facility area



15%
recycled water reuse

1.5 million tonnes
of soda ash



25 years
of workable trona reserves

200,000 tonnes
of sodium bicarbonate

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

11% progress towards our reduction target in carbon footprint at the end of 2020



Export to
75 countries

575
employees

Around
30000 hours
of training

1 | About Eti Soda

Mission and Vision



A successful company is never without a purpose on which it has built itself and a future in which it envisions itself.

At Eti Soda, we grow on a solid foundation that was laid years ago and a dream for an even better future for our company and the world.

Our mission...

is to bring in our quality and natural products to the economy by using the intact equity of our country with an environment and people-oriented approach and a dynamic, productive, and innovative team, and being aware of our social responsibility.

Our vision...

is to become a world brand by further raising the standard of our products and services, ensuring consistent growth in **Sodium Carbonate** and **Sodium Bicarbonate** production without ruling out sustainable development.

About Us

Today Eti Soda operates globally, both selling to our customers in Turkey and exporting worldwide, especially to European countries.



75%

of all products are exported

50% goes to Europe

50% goes to America, Africa and Asia-Pacific

Over 40 years ago, trona mine reserves were found during a routine coal exploration operation carried out in Beypazarı, Ankara. After the discovery in 1979, Eti Soda was established in 1998. With the establishment of Eti Soda, trona mine reserves started to be operated and brought into the local economy. Eti Soda is a global business with a strong Turkish heritage. Making our way into the international market as we keep our roots strong is one of our most significant points of pride.

One of the most important aspects of our international and local success is that Eti Soda is the first facility in the world to utilize innovative solution mining technology on a commercial scale. Today Eti Soda operates globally, both selling to our customers in Turkey and exporting worldwide, especially to European countries. We have reached 75 countries in our export network in 2020, as we export 75% of all our products. 50% of the products are exported to European

countries and 50% to America, Africa, and Asia-Pacific countries.

Our commercial operations started in 2009, following over US\$ 700 million of the initial investment. Today, we are responsible for 1.5 million tonnes of Soda Ash and 200,000 tons of sodium bicarbonate production annually. We are proud of what we have achieved as a 12 years old, strong business. The trona solution is taken into the monohydrate process and converted to Sodium Carbonate and Sodium Bicarbonate. We successfully meet the demand of many industries such as glass, detergent, feed, and baking powder production and create further demand through exporting and expediting the access of our products.



Soda Ash and Sodium Bicarbonate Production

Soda Ash is a natural product that is a key compound in a variety of industries such as glass, dry powder detergents, and lithium-ion batteries. Soda Ash ranks 10th in the most consumed inorganic compounds globally, and its utilization roots back over 5,000 years.

Sodium bicarbonate is a common mineral used in many applications, including food, feed industry, and industrial products. The best-known usage area of sodium bicarbonate is baking soda in our kitchens.

Trona ore is the raw material of natural soda ash and sodium bicarbonate produced through simple filtering, concentration, crystallization, and drying. Also, sodium bicarbonate is produced by a similar process utilizing the CO₂ gas revealed during soda ash production.

While a synthetic production of soda ash and sodium bicarbonate is possible, it is a costly, more energy and water-intensive production process. Eti Soda produces soda ash and sodium bicarbonate from naturally occurring trona for an economically and environmentally sustainable production. That's why we have been qualified to receive green product certification, and we have built a high-quality and trusted Soda Ash supply chain.

What do we do so differently that we rank foremost among our competitors?

The answer is using the solution mining technique and being the first and only Soda Ash manufacturer to do that in the world.

Innovative solution mining technology was first developed at Eti Soda. This production method injects heated water into the underground ore body, dissolving the trona-forming brine solution. The brine is then extracted to the surface and pumped to a central processing facility.

This closed-loop system is safer (no underground operatives), has minimal impact on the surface, uses significantly less energy and water than other production methods, and produces considerably less CO₂ emissions.



Products

At Eti Soda, we manufacture products that have a wide variety of usage, extend upon many industries, and touch many people's everyday lives.

Sodium Carbonate (soda ash) and Sodium Bicarbonate make up our products, and they are used as significant compounds of over 20 types of end products, production processes, and industries.

Areas of Use

Sodium Carbonate

- Glass
- Chemical industry
- Soap and detergent industry
- Textile industry
- Water softening
- Flue gas desulphurization
- Cellulose and paper industry
- Water and wastewater treatment

Sodium Bicarbonate

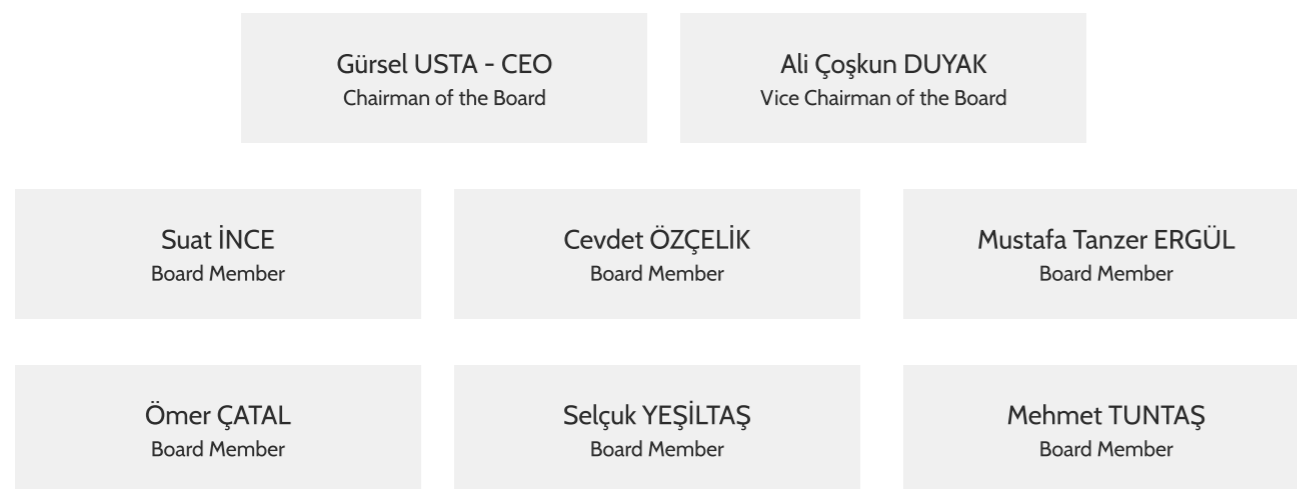
- Baking powder
- Food additive
- Beverage
- Tooth paste
- Animal feed
- Chemical Industry
- Cleaning materials
- Paper manufacturing
- Leather industry
- Textile industry
- Fuel gas treatment
- Water and wastewater treatment

Corporate Management

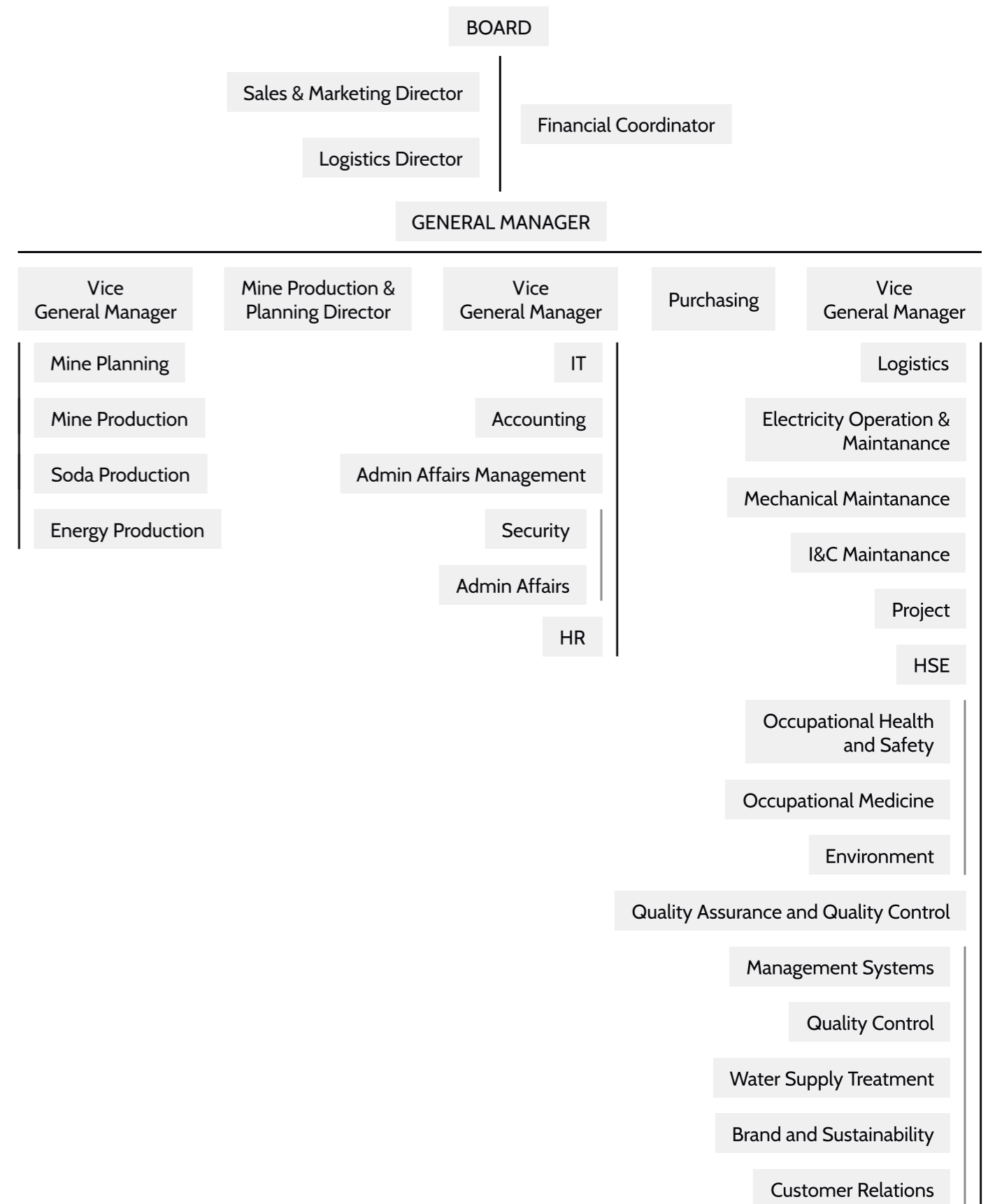
Eti Soda is not only Turkey's annual producer of more than 1.7 million tons of natural soda ash and sodium bicarbonate which exports to more than 70 countries, but also a value-creating company for more than 500 people and thousands of stakeholders. We manage to create such value and positive impact through the sustainable management systems that we establish. Our efficient and beneficial business system ensures successful operations, a hardworking and welcoming work culture, and contented stakeholders.

Eti Soda is one of Turkey's most successful public-private partnerships, with 74% of its shares owned by the Ciner Group and 26% of its shares owned by Eti Maden İşletmeleri A.Ş. Eti Soda continued to grow in the reporting period, managed by the general manager representing the board of directors. Sustainability values and principles shed light on the path Eti Soda followed in every step, creating social and environmental value hand in hand with our stakeholders.

Board Structure



Organization Structure



The management approach of Eti Soda is to expand its positive impact created by maintaining the quality of its products and services. Our business processes are specifically tailored in order to ensure accountability, responsibility, transparency, sustainability, and quality. We aim at implementing all relevant corporate management systems in the most appropriate and efficient way. For this purpose, we reinforce our management system in a wide range of certifications such as; quality, environment, occupational health and safety, social, energy, information security, food and feed safety, laboratory accreditation. Targets and performances of all processes are followed accordingly.

Eti Soda became a signatory to the UN Global Compact in 2020. We are proud to implement universal sustainability principles, called the 10 Principles, which cover human and labor rights, environmental concerns, and anti-corruption.

We strictly enforce policies that ensure no human rights abuse and discrimination occur within Eti Soda.

We prevent forced and child labour within our facilities, take necessary precautions to lessen our environmental impact, and continue to research environmentally friendly technologies. Finally, we have zero tolerance towards corruption and bribery at every level of staff working at Eti Soda.

We work in line with the strategies shaped by Eti Soda's corporate goals, global economic developments, industry trends, and priority issues decided on the basis of communication with internal and external stakeholders. In order to get the strategies and related actions going smoothly, we establish governance systems that minimize relevant corporate risks and maximize opportunities.

At Eti Soda, we present a set of values and principles that constitute our corporate mission and vision. Our business grows in the light of our moral values and the principle of transparency, which fuels us to work towards growth together with all our stakeholders.

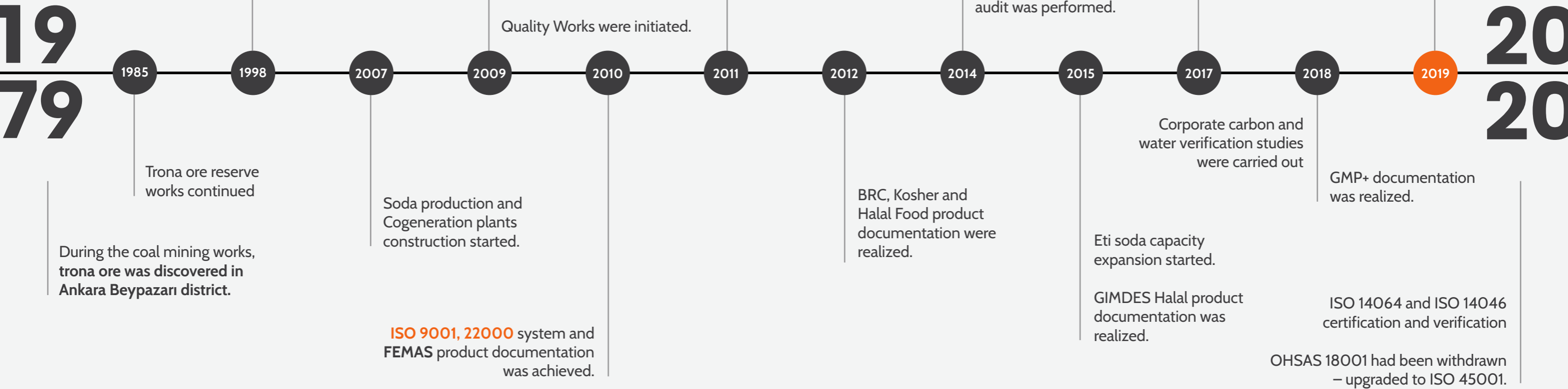
We put importance on the action which is perpetuated under our commitments. That's why employee training is an essential part of our governance. The Human Resources department is responsible for the training process. In the scope of this process, the training plan is prepared annually.

The main purpose of the training plan is to support the development of employees in line with legal requirements and requests from employees. Training of soft skills and moral behaviours are valued and well appreciated at Eti Soda. All employees, including managers, received training on Ethical Behaviour Principles, Modern Slavery, and Human Trafficking. We support and enforce an ethical working place where no rights are violated. **Our training guarantees the development of employees on multiple subjects such as social and technical skills, company values, and career development.**



Milestones

ETI SODA was established in 1998 in order to extract, operate and bring in economy trona mine reserves, found during routine coal boring operation carried out in Beypazarı, Ankara in 1979.



...Today, EtI Soda produces over 1.5 million tonnes of Soda Ash and 200,000 tonnes of sodium bicarbonate every year and exports to 75 countries all around the world.

Memberships and Initiatives



European Soda Ash Producers Association (ESaPa)



Middle East Exporters' Association (OAİB)



Native Mining Development Foundation

Yurt Madenciliğini Geliştirme Vakfı



CDP



Ecovadis



Beypazarı Chamber of Commerce



Ankara Chamber of Commerce



İstanbul Chamber of Commerce



Turkish Statistical Institute (TUIK)



The Central Bank of the Republic of Turkey (TCMB)



İstanbul Minerals and Metals Exporters' Association (İMMİB)



Istanbul Chemicals and Chemical Products Exporters Association (İKMİB)



EPD Turkey



SEDEX



UN Global Compact*



CEO Water Mandate**

*Since 2020 Eti Soda A.Ş. has been committed to the UN Global Compact corporate responsibility initiative and its principles in the areas of human rights, labour, the environment and anti-corruption.

**Eti Soda A.Ş. is a CEO Water Mandate endorsing company for demonstrating its ongoing commitment to the initiative and its six commitment areas. Since 2021, Eti Soda A.Ş. has included a description of action and investments undertaken in relation to the CEO Water Mandate in its annual Communication on Progress, available at <https://ceowatermandate.org/about/endorsing-companies/>

2 | Hand in Hand for Sustainability



Etī Soda Approach to Sustainability

As Etī Soda, we are honored to be the first facility globally, mainly in the industry, that produces Natural Sodium Carbonate and Sodium Bicarbonate with the solution mining technique. When it comes to our business strategy and company culture, sustainability, which is a pillar that cannot be ignored, is the guiding principle of all business activities at Etī Soda.

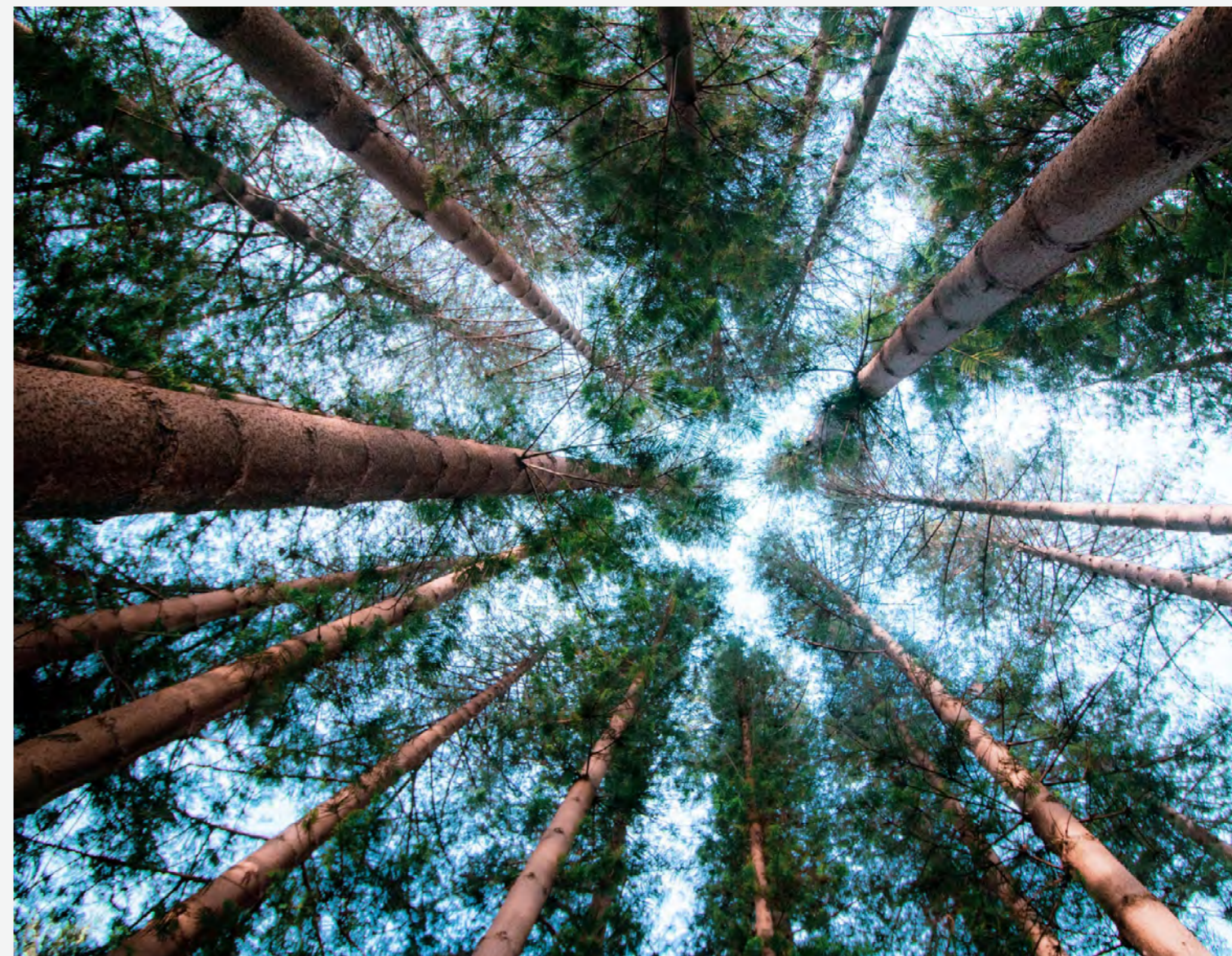
According to Etī Soda's ability to positively impact the world, the company's focus subjects and objectives have been chosen through extensive materiality and risk analyses. Additionally, Etī Soda participates in global and regional sustainability initiatives to achieve long-term success regarding social issues and codes of ethics.

We closely monitor the global transition to a more climate-conscious production through the adoption of the Emissions Trade System (ETS). We implement ETS and its results into our long-term strategic planning. In addition, on topics such as climate change, effective resource use, and water management, we solicit the perspectives of industry professionals and academia

Our standards are visible, sturdy, and long-lasting, and they are subject to ongoing evaluation

They are as follows:

- ✔ Environmental studies conducted independently and in-house
- ✔ We ensure that the negative impacts on the environment are minimized by evaluating every stage of our process.
- ✔ Projects to increase the efficacy of environmental management.
- ✔ We maintain a tight working relationship with external regulatory organizations to monitor and improve performance standards.
- ✔ Governance is at the forefront of our sustainability mission.
- ✔ Etī Soda created a Sustainability Committee in 2017, intending to determine how to develop short, medium, and long-term sustainability targets..
- ✔ Environmental and social risk management are integral parts of Etī Soda's strategic and operational plans.



The principles of sustainable development guide all company choices and actions.

Continuous improvement and optimization are two of the main aims of Etī Soda's sustainability efforts. The company attempts to meet the needs and expectations of its numerous stakeholder groups as well as possible.

At Eti Soda, sustainable business models are established to leave a better world to future generations, and our sustainability strategy, as a global corporation, is interwoven into how we do business along the value chain. We continue enhancing our sustainable business practices and endeavour to establish a fair, egalitarian, and respectful work environment in line with the objectives of the United Nations. Our sustainability roadmap and the commitment of our employees help us continuously enhance operational procedures, better use global resources, and develop in a way that benefits all of our stakeholders while also increasing our sustainable impact.



Sedex: Social Activity Audit at Eti Soda

Sedex is one of the world's major ethical trade service providers, seeking to improve circumstances for workers throughout global supply chains. Global supply chain working conditions are improved through Sedex, a prominent ethical trade membership organisation.

Since 2013, Eti Soda, a member of the SEDEX platform, has been subjected to SEDEX audits. Therefore, social and environmental performance, as well as working conditions, are evaluated through these audits.

EcoVadis: Eti Soda's Performance at Business Sustainability Ratings

More than 75,000 businesses worldwide have been certified by EcoVadis since its launch in 2007, and it has grown to be the largest and most reliable source for sustainability ratings.

The EcoVadis sustainability assessment methodology reviews how well a firm has incorporated the principles of Sustainability/CSR into its business and management structure.

Eti Soda has been a member of EcoVadis since 2013 and earned a Silver Medal from the platform in November of 2020. We underscore our commitment to global best practices in principled trade strategies, environmental compliance, sustainable procurement, ethical labor, and human rights.

Responsible Governance

In a world that is more connected and dependent on each other than ever due to increasing global challenges, it is vital to establish inclusive systems that are solutions-oriented and responsible, align corporate mission with the social and environmental goals and build a governance structure that is empowered to take on the challenge. At Eti Soda, governance is at the forefront of our sustainability mission, with levels and layers of responsibility ingrained in all our internal stakeholders

The highest governance body at Eti Soda is the CEO and Chairman of the Board, Gürsel Usta. The committees are responsible for making decisions on economic, environmental, and social issues with the approval of the

Sustainability Committee Leader and the CEO. The Sustainability Committee Leader/General Manager reports directly to the Chairman of the Board of Directors.

The highest governance body's role in the impact assessment of risk management processes on economic, environmental, and social issues is ensured through the appointment of the: Sustainability Committee Leader/Vice General Manager is also the Risk Committee Leader.

The management appointed Eti Soda Sustainability Committee in 2017, intending to determine how to develop short, medium, and long-term sustainability targets in compliance with the company's fundamental beliefs and

policies. Environmental, social, and governance issues are discussed and developed by the committee. The Sustainability Committee has regular meetings where all risk issues are discussed and addressed.

Sustainability policy and objectives, integrated management system performance evaluations, as well as the necessary resources for continual development are all the responsibility of the committee members.



Sustainability team's responsibilities:

- Defining and monitoring objectives
- Conducting stakeholder surveys to determine stakeholders' expectations
- Preparing sustainability meetings

We have a **comprehensive consultation process between stakeholders and the highest governance body** on economic, environmental, and social issues to ensure direct and honest stakeholder engagement at all times:

- There is an open door application.
- A Stakeholder Board was formed: Local people, local government, non-governmental organizations, and other associations
- Stakeholder expectations from the fields are included in the processes to the extent of their applicability.



In the reporting year of 2020, with the decision of our board of directors, it was found insufficient to follow up our sustainability studies only with the committee, and the Sustainability and Brand department was established. With this department being directly responsible for the follow-up and execution of sustainability policies, strategies, and projects, processes are expected to improve more efficiently.

Our teams have been encouraged to play their part in our Eti Soda Sustainability roadmap through actions in their daily lives that positively impact fighting climate change and preserving the environment. Our employees have seen significant personal engagement in making sustainability relevant and palpable throughout the company.

The board of directors is at the forefront of Eti Soda's commitment to environmental responsibility.

- The company's sustainable development commitments are monitored and approved by the Board of directors.
- The company's Risk Committee conducts regular reviews of CSR issues as part of its overall risk management strategy.

The Board of Directors

- Determines the goals and sets the approach.
- Monitors the findings of the yearly sustainability reports..
- Ensures the incorporation of sustainability into the generation of monetary value.
- Ensures that the company's critical strategic choices take climate problems into account.

Coordination and supervision of the Sustainability Committee

- Define and implement sustainable goals' road plans.
- Informs the Board of Directors regarding the findings.
- Motivates their coworkers to achieve predetermined goals.
- Make a plan to enhance procedures and methods.
- Self-assessment is an integral part of this process.
- Determines what can be done better by each set of stakeholders.
- Improves their organizations' sustainability by developing improvement strategies.

Employees

- Involvement of the workforce in efforts to meet sustainability targets.

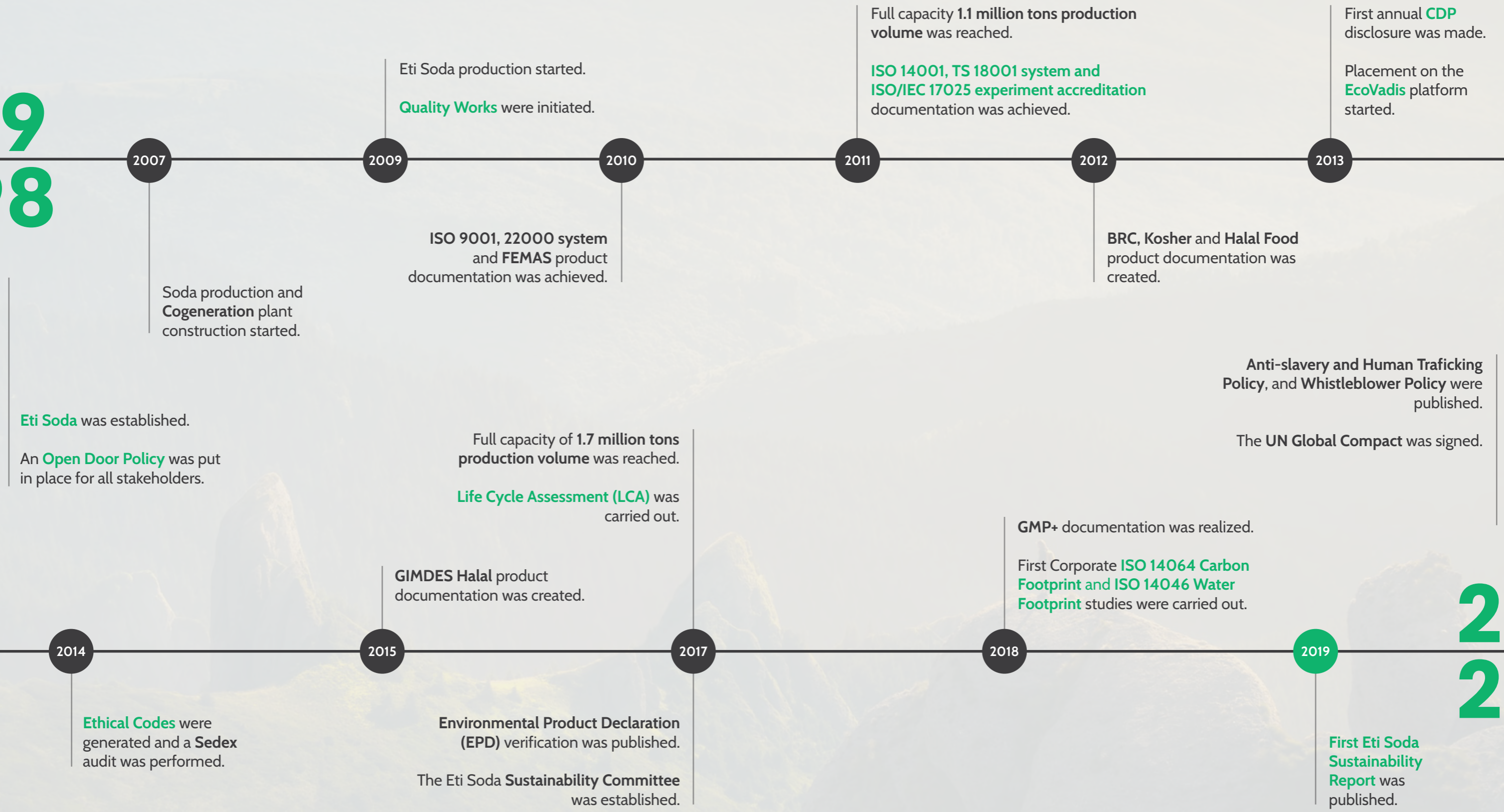
Governance structures for sustainability within Eti Soda:

Sustainability Committee	Ethics Board	Stakeholder Relations Board	Risk Committee	Disciplinary Board	Senior Disciplinary Board
CEO	Deputy General Manager	Deputy General Manager	Deputy General Manager	Deputy General Manager	General Manager
General Manager	Health, Safety and Environment Manager	Administrative Affairs Manager	Quality Assurance Manager	Human Resources Manager	Deputy General Manager
Deputy General Manager	Administrative Affairs Manager	Accounting Manager	Health, Safety and Environment Manager	Accounting Manager	Assistant General Manager
Quality Assurance Manager			Management Systems Specialist	Worker's Representative	Worker's Representative
Health, Safety and Environment Manager					
Sustainability Brand Specialist					
Customer Relations Specialist					
Management Systems Specialist					
Environmental Engineer					
Water Supply & Treatment Specialist					

Sustainability Milestones

19
98

20
20



Risk and Opportunities Analysis

While making our institutional risk assessment, we consider stakeholder expectations, business processes, product requirements, legal and regulatory agency requirements

To carry out the institutional risk assessment effectively and to identify the risks that may arise from the operations or the interaction of the processes with each other, working groups consisting of all relevant process managers and experienced employees have been formed.

In Eti Soda's risk assessment;

- ✔ corporate,
- ✔ operational (both direct and supply chain),
- ✔ contractual,
- ✔ customer expectations (downstream risks),
- ✔ process and product requirements,
- ✔ legal and regulatory requirements,
- ✔ and risks arising from our activities

are taken into consideration.






The risks and opportunities to our operations and business are identified through detailed risk analyses to ensure that our integrated management systems can successfully achieve their intended output, improve our desired results and impacts, prevent or reduce hazards and liabilities, and achieve success and improvement.

The Strategic Planning, Risk and Opportunity Identification Procedure, which was created as a guide, is used in this context. The risk assessment methodology included in the relevant procedure has been determined following the ISO 31001 standard.

A Well-Structured Risk Management System

Risk management is an integral part of Eti Soda's strategic and operational plans. Sustainability is constantly taken into account during risk assessment. Eti Soda places equal importance on anticipating, identifying, managing, mitigating, measuring, monitoring, and preventing risks as it determines, addresses, and optimizes opportunities. Eti Soda's extensive risk-related processes and measures, from the Board of Directors to front-line employees, supply chain partners, and consumers, reflect this.

In Eti Soda, risks are governed in 5 stages:

-  Define
-  Analyze
-  Plan
-  Monitor & Measure
-  React

After a risk is defined, the impact and probability of this risk is identified through analysis.



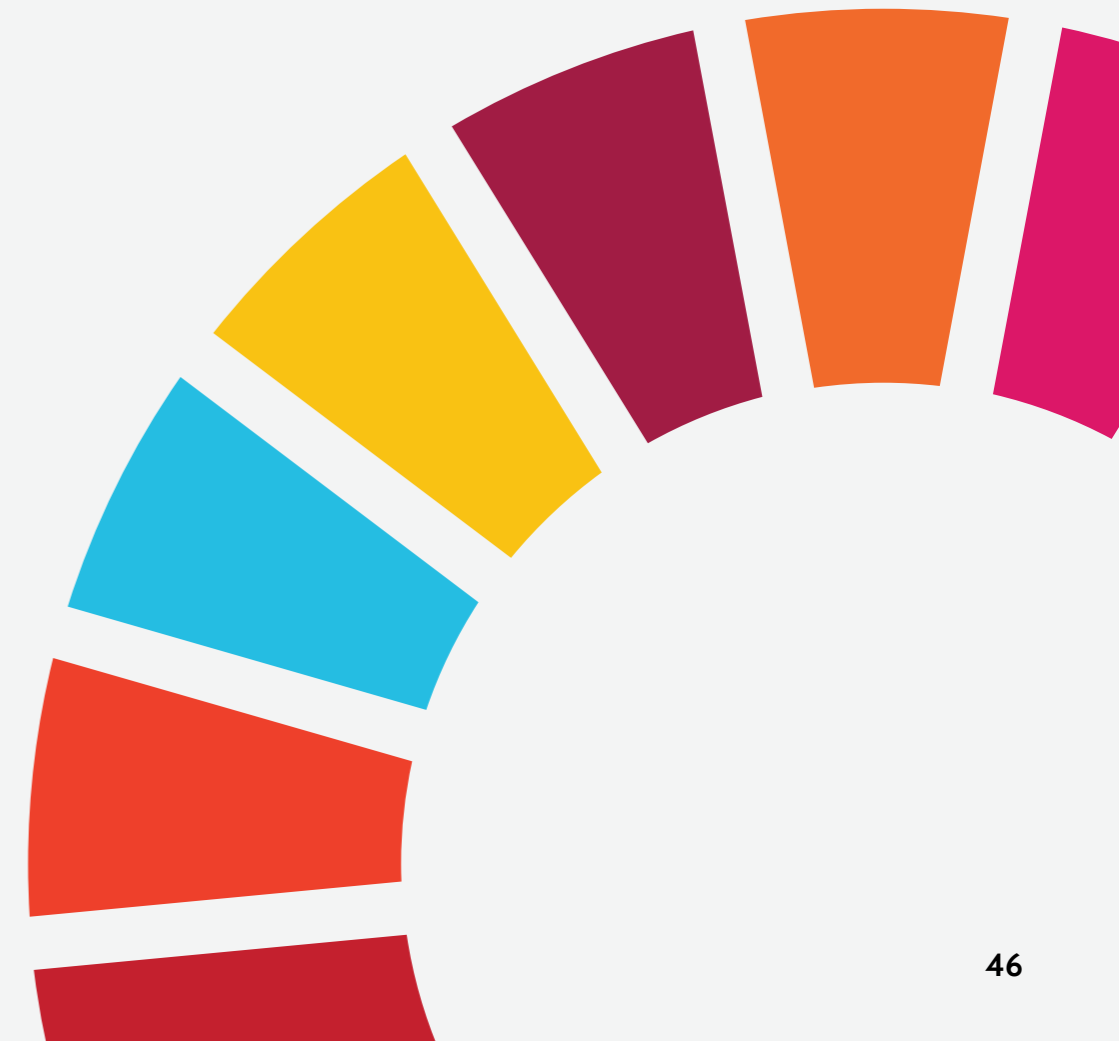
Risks and Opportunities

Environmental		Social		Economic & Governance	
Risks	Opportunities	Risks	Opportunities	Risks	Opportunities
Climate change and droughts	Emissions reduction goals and projects	Social compliance in supply chain	Certifications of compliance	Fluctuations in currency exchange rate	Local stakeholder engagement
Water safety and security	Environmental certifications	Pandemic disruptions	Employee loyalty & satisfaction	Global economic stagnation	Collective action through external initiatives
Waste mismanagement	Existing sustainability applications	Local community dissatisfaction	Strict occupational health and safety applications	Conflict of interest and corruption risks	Increase in product price
Food safety contamination	Solution mining technology	Female employment in mining industry	Trained technical employees	Regulations and tax incidence	Expansion of export network
Loss of habitat	Installation of solar power plants	Available technical personnel	High local employment	Limited reserves	Available government incentives
Wastewater management	Energy efficiency technologies		Employee engagement	Mining licence requirements	High product quality
Waste steam					Ethical business approach
Energy supply					Fair competition in the soda industry
					High reserve quality
					Internal sust. governance system

Eti Soda Commitments for Our Future

We commit to;

- ✔ Determining and evaluating the subjects that impact the company's economic, social, and environmental sustainability.
- ✔ Shaping and steering strategic targets according to stakeholders' needs, concerns, and interests.
- ✔ Addressing sustainability issues throughout the supply chain to the best of our ability
- ✔ Expanding our positive impact to all stakeholders in the local community.
- ✔ Setting and realizing sustainability targets for Eti Soda and contributing to the Global Goals.
- ✔ Determining, measuring, monitoring, and improving all material subjects for Eti Soda and its Stakeholders.
- ✔ Adopting a transparency, accountability, trust, and ethics system in our business.
- ✔ Ensuring all relevant process owners embrace all material subjects and take action to realize progress.



Eti Soda Strategic Targets

UN SDGs	Targets	Goal	Compliance with the Target as of 2020 (%)
	Continuous Production	Supplying the needed raw material for production <i>(Includes the first 5 years of a 25 years raw material plan)</i>	36
	Sustainable Branding	Increasing the brand value	53
	Sustainable Market Network	Exploring New Markets in the Scope of Expanding Production Volume	79
	Emission Reduction and Energy Efficiency	<p>Reducing emission 50% per ton of product <i>(Includes the first 5 years of the 25 years emission reduction project target Target Year: 2040, Major year is chosen as 2012.)</i></p> <p>Forestation <i>(Includes the first 5 years of the 25 years emission reduction project target)</i></p> <p>Renewable Energy Source: 2 Mw Solar Panel <i>(Includes the first 5 years of the 25 years emission reduction project target)</i></p> <p>Recycling of waste steam <i>(Includes the first 5 years of the 25 years emission reduction project target)</i></p>	<p>74</p> <p>49</p> <p>20</p> <p>10</p>

UN SDGs	Targets	Goal	Compliance with the Target as of 2020 (%)
	Fight Against Water Scarcity	<p>Maintaining the Recycled Water Amount Between 20-25% <i>(Covers the first 5-year cycle of 25 years, increasing the amount of recycled water target.)</i></p> <p>Maintaining the amount of discharged water between 15-20% <i>(Covers the first 5-year cycle of 25 years, increasing the amount of recycled water target.)</i></p>	<p>60</p> <p>60</p>
	Raising Awareness on Supply Chain	<p>Conducting Social Compliance Audit for the 100% of our suppliers <i>(Covers the first 5-year cycle of 25 years raising awareness on supply chain targets.)</i></p> <p>Creating supplier portal</p> <p>Signing the supplier rules contract</p>	<p>20</p> <p>60</p> <p>100</p>

3 | Stakeholder Analysis

Stakeholder Analysis

The company's actions impact external and internal stakeholders, as revealed by mapping all critical stakeholders. Face-to-face interviews and the data gathered from the core of the materiality analysis, which should assist the organisation in identifying both potential possibilities and threats early on in the process.

We consider our stakeholders' interests when deciding which topics to focus on, and we communicate freely and effectively about our work in these areas.

We accept the international methodology and concepts regarding stakeholder-relevant concerns, which define the most critical corporate sustainability areas that should be reported to structure and organize our approach. Aside from that, we examined our interactions with various stakeholder groups and papers provided by our stakeholders and their representative organisations.



We see the recommendations and expectations from our stakeholders as an opportunity for continuous improvement and provide the required resources to effectively and correctly analyze them.

Stakeholder Engagement

Stakeholder Group	Engagement Method	Frequency	Interests and Concerns
Employees	<ul style="list-style-type: none"> Employee satisfaction surveys OHS reporting Regular employee meetings One on one meetings and interviews Social media channels News bulletins Sustainability reporting and materiality analysis 	Continuous	<ul style="list-style-type: none"> Employee rights, respect and value, Employee training and development Employee awareness Health and safety systems Healthy communication with management Career opportunities Responsible management Ethical business practices
Customers	<ul style="list-style-type: none"> Customer satisfaction surveys Regular meetings Account management Social media channels Sustainability reporting and materiality analysis Audits and field visits 	Continuous	<ul style="list-style-type: none"> Product health and safety Customer complaints, expectations and recommendations Service Product quality Uninterrupted supply chains Certifications Transparency Application of management systems Low impact product life cycle
Suppliers	<ul style="list-style-type: none"> Supplier surveys Regular supplier meetings Supplier evaluation process Audits and field visits Certifications Social media channels Sustainability reporting and materiality analysis 	Periodic	<ul style="list-style-type: none"> Supplier inclusion Supplier evaluation and development process Long-term business contracts Timely payments Increase in purchasing volume Notification on certification requirements

Stakeholder Group	Engagement Method	Frequency	Interests and Concerns
Locals	<ul style="list-style-type: none"> Open door policy Locals participation day Stakeholder committee meetings Corporate social responsibility projects Social media channels Sustainability reporting and materiality analysis Visits to the neighboring villages Community events and occasions 	Weekly	<ul style="list-style-type: none"> Public health and safety Conservation of natural resources Donation and support to local organizations Low environmental impact of mining activities Water safety and security Transparency Stakeholder engagement Employment opportunities Certifications Community investments
Investors	<ul style="list-style-type: none"> Committee meetings Legal, financial and sustainability reporting Reporting on the as-needed basis Social media channels Industry trade fairs Conference and panels 	Periodic	<ul style="list-style-type: none"> Transparency in reporting and communication with stakeholders Stakeholders' rights Profitability Changes in market value Establishment of corporate management systems
Public Institutions	<ul style="list-style-type: none"> Official correspondance Regular meetings Audits and visits Legal and financial reporting Social media channels Sustainability reporting and materiality analysis 	Continuous	<ul style="list-style-type: none"> Compliance with laws and regulations Contribution to the national economy Mandatory Environmental Impact Evaluation Improvement in working conditions
Non-governmental Organizations	<ul style="list-style-type: none"> Stakeholder committee meetings Field visits Social media channels Sustainability reporting and materiality analysis Certifications Corporate social responsibility projects 	Project-based	<ul style="list-style-type: none"> Natural resource use Social and environmental compliance Equality of opportunity Inclusive governance Compliance to laws and regulations Employment Community investments

A Conversation With Locals

While preparing the 2019-2020 sustainability report, we decided to get the opinions of the neighborhood representatives of the villages around us. We have been in contact with and hosting them in our facility almost daily as part of our open-door policy. We talked to the mukhtars about our sustainability efforts and asked them and their families their priorities for the villages they represent.

As a result of the survey, we saw that the people around us mostly have questions about the impact of our facility's processes on them and their living spaces. Our work is expected to continue to create a positive impact.

The neighborhood representatives who participated in our additional stakeholder engagement have been given a more limited materiality survey, which focused on the direct impact of our operations on the locals.



- 16 Biodiversity
- 16 Employment Support to Local People
- 20 Water Management
- 17 Climate Change
- 20 Greenhouse Gasses and Air pollution
- 17 Stakeholder Communication
- 12 Gender Equality and Equity
- 20 Work Safety

The results reveal that our surrounding community is most concerned about the success and efficiency of our water management, the impact of our activities on air pollution and our emissions of greenhouse gases, and lastly, about the work safety of their community employed at Eti Soda facilities.

Closely followed by these, local neighborhood representatives marked climate change and stakeholder communication as material topics.

Materiality Analysis

In order to determine the materiality of several topics for our stakeholders, we conducted an online materiality analysis survey following the **AA1000 Stakeholder Engagement Standard**. The results will receive a great deal of attention in our sustainability strategy and future projects as they reveal the opinions of our key stakeholders that are affected by Eti Soda.

Material Topics

Very high priority

- ☛ Wastewater management
- ☛ GHG emissions
- ☛ Water consumption
- ☛ Occupational health and safety
- ☛ Economic performance
- ☛ Waste management
- ☛ Anti-corruption
- ☛ Sustainable economic growth

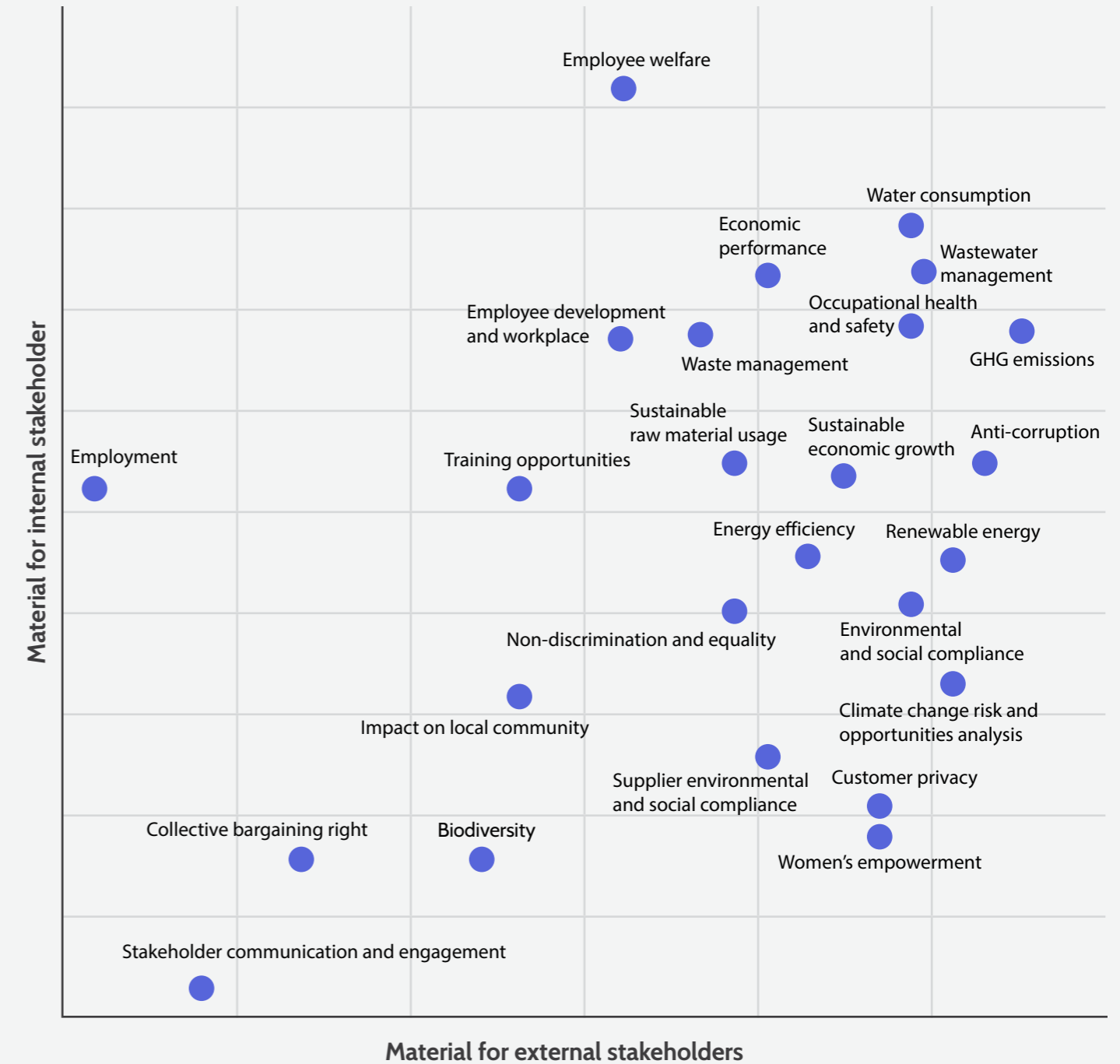
High priority

- ☛ Employee welfare
- ☛ Renewable energy
- ☛ Energy efficiency
- ☛ Environmental and social compliance
- ☛ Climate change risk and opportunities analysis
- ☛ Employee development and workplace
- ☛ Non-discrimination and equality
- ☛ Sustainable raw material usage
- ☛ Training opportunities
- ☛ Supplier environmental and social compliance
- ☛ Customer privacy
- ☛ Women's empowerment
- ☛ Impact on local community

Priority

- ☛ Biodiversity
- ☛ Collective bargaining right
- ☛ Employment
- ☛ Stakeholder communication and engagement

Materiality Matrix



4 | Hand in Hand with Employees

Hand in Hand with Employees

Our success derives from our employees – from their pioneering spirit, curiosity and diversity. We support our employees in their development and promote inclusive company culture..

At Eti Soda, one of our most important priorities is to benefit local people and employment. For this reason, most of our employees are our fellow citizens from the local community around the facility and Ankara region.

The primary organizational units at Eti Soda start from the production of soda, energy and mining production, and water supply-treatment units; continue with supporting departments such as sales, marketing, and distribution-logistics management; overseen by the administrative units, including the senior management.

Eti Soda’s human resources approach for these organizational units is based on equality of opportunity for all without discrimination based on race, color, gender, religion, language, marital status, sexual orientation, gender identity, political opinion, ethnic identity, health status, family responsibilities, union activity or membership, discrimination based on factors such as physical disability or age.

At Eti soda, we give priority to women's employment as much as possible. As of 2020, our female employment rate is 11%. Our human resources department is constantly working to increase this rate. In addition, we carry out studies for the development of our industry and the training of qualified employees, and we attach importance to employing young people in recruitment. As of 2020, 73% of our employees are younger than 30 years old.

With the experience and training they have gained at Eti Soda, our employees understand the importance of social and environmental development.

73%
Employees younger than 30 years old

11%
Female employment rate

	2019			2020		
	Female	Male	Total	Female	Male	Total
Total number of employees	55	517	572	66	509	575
New employees	-	-	56	-	-	33
Number of Executives	3	23	26	3	24	27
Number of employees according to age group	-	-	-	-	-	-
Younger than 30	-	-	416	-	-	418
Between 30-50	-	-	150	-	-	152
Older than 50	-	-	6	-	-	5
Employees who on maternity/paternity leaves	2	24	-	4	35	-
Employees who returned from maternity/paternity leaves	2	24	-	4	35	-
Employees who are employed 12 months after their m/p leave	2	24	-	4	35	-

The right of unionization is freed for all employees. All employees at all levels have collective bargaining rights, and they are constantly informed about this. For example, employees are notified in the employee handbook during ethics training and on-the-job orientation training. As the employees of Eti Soda expressed not wanting a collective bargaining agreement, no employee is working under such an arrangement.

At Eti Soda, we aim to maintain exceptional talents and become one of the top companies to work for. We support young professionals at the beginning of their careers to gain into the job market. Our ambition is to allow young talents to work in our organization, gain hands-on work experience with comprehensive training to provide for tomorrow's leaders while enhancing our brand value. As a result, we participated in the career fairs of Middle Eastern Technical and Gazi Universities in 2019. In 2020, we attended the career day of Middle Eastern University and Istanbul Technical University.



2019-2020

Employees Welfare

Eti Soda's employees are the company's lifeblood, and we strive to create the greatest possible working environment for them. In addition, we are committed to ensuring the well-being of our colleagues across the organisation, whether through the creation of policies to promote diverse and inclusive company culture, opportunities for training and development, or going above and beyond local market standards to provide better benefits.

Discrimination is not tolerated in our company, and we take the necessary measures to avoid it and adhere to our standards. We also endeavor to ensure the safety of our employees by putting in place internal mechanisms.

We aim to achieve high employee engagement and business strategy success by integrating our employee development policy with performance management tools. In consequence, a premium has been given to all employees during 2019 and 2020.

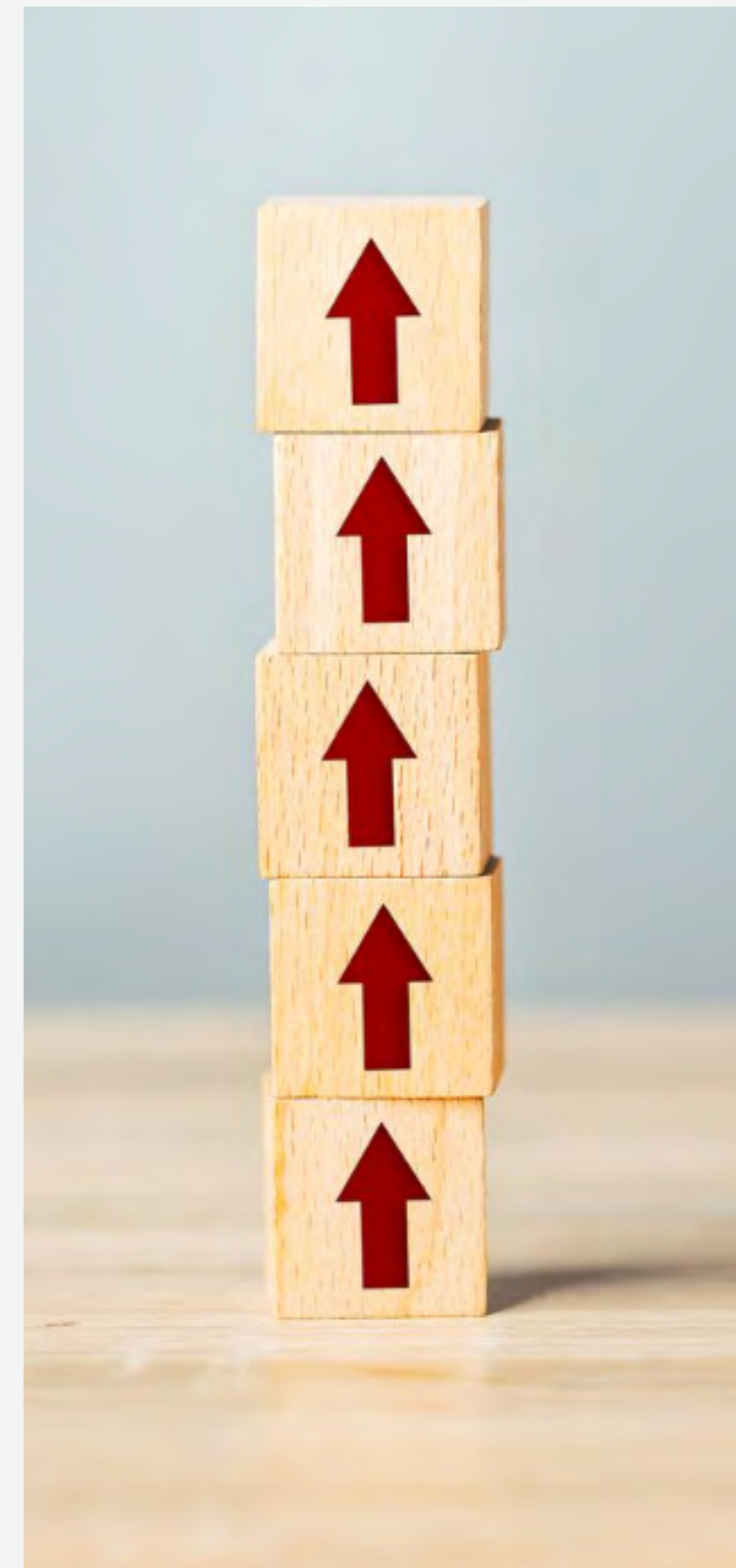
Our shared values and competency model constantly shape our organisation's culture. At the same time, we lay a significant focus on developing our organisational culture. As a well-known brand, we can capture the attention of potential employees by showcasing our company to the public and promoting our open jobs. In this way, we can further unite and integrate our organisation as a human-founded enterprise.

Equality of opportunity and workplace diversity produces more effective processes and comprehensive results; for this reason, we prioritize increasing women's representation in the operations and decision-making processes in an industry that is traditionally male-dominant. Our company activities are carried out without discrimination in line with the Human Resources Regulation, Ethical Behavior Principles, Modern Anti-Slavery Policy, Disciplinary Penalties List, and the Whistleblowing Policy.

Eti Soda operates a "Hotline" through which all employees can contact compliance units directly to report issues or events that they consider improper, problematic, or deviating from the provisions of the law, procedures, or the Code of Ethics.

There is a hotline specified in the policy for all stakeholders. Our whistle-blowing policy protects the employees from any incident of retaliation where they can make confidential notice to the Ethics Board.

We do not have employees who belong to minority or vulnerable groups in our organization. **There were no cases of discrimination in 2019 and 2020**



Employee Development

Our employees are what brings Eti Soda together. We care deeply about employee development to achieve growth beneficial to society, the environment, and our business processes. Training is held following the principle of «Meet the training needs of our employees, contribute their personal developments, elevate the employee satisfaction, ensure the unit and company targets to be reached by creating team spirit in our employees, increase the awareness of our employees regarding the quality, environment, occupational health and security» which is present in our company policy

We are helping our employees strengthen their skills, thus adding value to their personal growth and the work itself.

In 2019

24,565.75 hours

of total training time



In 2019, we carried out 24.565,75 hours of training of which 8.431,50 hours for white-collar workers and 16.134,25 hours for blue-collar workers. All our training plans worked as expected, left the employees, and the management satisfied with the insights given. Within the context of our cooperation with Başkent University in 2019, most of the personal development and vocational training was provided by Başkent University instructors. In addition, Başkent University opened a particular discounted graduate program for Eti Soda employees.

In 2020, we provided a total of 3.166,55 hours of training, of which 1.576 hours for white-collar workers and 1.590,55 hours for blue-collar workers. Even though the conditions brought by the Covid-19 pandemic put a strain on our training plans, we have decided to establish an online training system for more sustainable training processes and complete the missing training.



We aim to better adapt to similar risks that might be encountered and to globally changing working conditions.

With our new online training system, we will be able to have flexibility in the training we offer to our employees, and we will provide training opportunities for more employees.

Health and Safety

At Eti Soda, caring for our employees' health, safety and wellbeing have been our constant focus for years. We put great effort towards perpetuating a safe and healthy work environment. We take precautions in terms of safety at work and minimize accidents by being aware of all the general and specific risks. Not only do we protect our employees by taking action, but we also improve our policies continuously in line with global safety measurements.

In the workplace of Eti Soda, ISO 45001 Occupational Health and Safety Measurement Systems and ISO 31000 Risk Management Standard are implemented.

In Eti Soda facility, all employees are defined according to their Social Security Institution system work. Job descriptions are available under these definitions. There is no out-of-scope personnel in our workplace—all employees, activities, and workplaces are covered by the occupational health and safety management system.



We have established a risk committee to identify business and process-specific hazards. We are conducting risk assessment analysis within the scope of ISO 45001 Management Systems on a routine and non-routine basis so that no potential risk is overlooked. In the case of a dangerous event, an on-site investigation is carried out by Occupational Safety Experts and field supervisors. Corrective action is initiated if necessary and required.

Employee representatives in occupational safety committees are supported and endorsed in order to ensure all employees' participation in the Occupational Health and Safety processes.

All decisions taken by the committee are published openly on bulletin boards and our intranet systems.

The work schedules are created in our facilities, and periodic follow-up of work programs in the Occupational Safety Board work as a control hierarchy where hazards are eliminated, and risks are minimized.

We know how important communication is in safety measurements; that's why we placed occupational hazards, near-miss forms, and boxes in our facility, which the employees actively use.

The Occupational Health and Safety Board evaluates all the reported incidents and makes decisions to correct the nonconformity.

In accordance with the Occupational Health and Safety Law, employees can exercise their right to avoid work if they are working in a workplace with a high risk of an accident.

The management and the Health, Safety, and Environment Department (HSE) are in contact with all employees in this context, ensuring the safety and trust of Eti Soda employees.

Eti Soda's ethics committee takes a strong stance against injustice and inequity, and the notification policy protects employees from retaliation.

Work-related injuries recorded were 28 and 27, respectively, in 2019 and 2020.



At Eti Soda facilities, we have an Occupational Health Department which employs one full-time occupational physician, five full-time health personnel providing infirmary services in addition to one patient transport ambulance and ambulance driver. Infirmary service is provided at all shifts to maintain employee wellbeing.

In addition to the audits and regulations, Eti Soda receives services such as controls for lifting devices, occupational hygiene controls, fire system controls, and dangerous goods safety controls from specialized institutions and organizations.

Pandemic Management

At Eti Soda, we strive to overcome the outcomes of the Covid-19 pandemic in any way possible. We have put forward a management system for the pandemic from day zero, elaborating on every aspect to protect our employee health and business success.

Eti Soda, which meets the determined criteria and raises the awareness of all its personnel by taking the necessary precautions, was entitled to receive the TSE COVID-19 Safe Service Certificate given by the Turkish Standards Institute, within the scope of the fight against the Covid-19 pandemic.

Eti Soda started to take precautions right after the first effects of the Covid-19 pandemic began to be seen in our country. Our decisions were and still are in line with the high level of responsibility that we have concerning our employees. We manage the pandemic outcomes with the thought and effort to overcome these difficult days as a country and a community in the best way possible by protecting our employees' health and ensuring the continuity of production simultaneously. We have been working in coordination with the Ministry of Health to provide a comprehensive approach to managing the risks.

- ✔ Covid-19 booklets were prepared and delivered to our employees as hardcopy and softcopy.
- ✔ The fingerprint reading turnstile system has been converted to a card pass system.
- ✔ Employees over 60 years old, pregnant, and with chronic illnesses are eligible for administrative leave.
- ✔ A double shift system was applied to reduce employee density and isolate some groups. The remote working system was introduced for the office staff. The standard working order has started again during the normalization process.
- ✔ It has been ensured that the occupational physician examines the personnel returning from annual leave or business travel.
- ✔ In Covid-19 cases, rapid interventions were made with instant exchange of ideas in suspects or contacts. A high level of responsibility and effective decisions were taken in filiation.
- ✔ Information emails, mass SMS, and videos of the Ministry of Health were sent to employees almost every day to raise awareness about compliance with the rules.
- ✔ Information posters of the Ministry of Health were hung on the notice boards, and large-size canvas posters were designed to hang in various parts of our facility in order to expand awareness further.



Rewarding

At Eti Soda, our occupational health and safety departments implemented a reward and punishment system to increase employee participation in practices to prevent dangerous situations. With this system, it aims to increase the number of employees reporting such conditions and thus be able to deal with OHS risks more comprehensively.

The purpose of OHS reward and punishment practices is shaped around communicating the occupational safety aspects to all our employees. It includes managing the occupational safety activities of our personnel, contributing to their work focused on occupational safety, working and contributing under the rules while punishing those who violate the disciplinary procedure and the Occupational Health and Safety Law. In addition, OHS forms a guideline to create and measure individual performance monitoring criteria, rewarding the personnel whose performance increases.

Overall, it is the assignment of practices and principles to encourage the continuous development of positive forms.

Employees who exhibit disorderly behavior are punished, and exemplary behavior is rewarded. For example, occupational accidents due to dangerous actions are counted as -20 points. We are aware that reporting near-misses and incidents provides a solid, proactive approach to our business. Therefore, reporting near-misses is counted as +10 points. Consequently, we have reached a numerically detectable stage by implementing the Award Penalty Procedure at the level of notification of preliminary dangers to eliminate occupational accidents and the elements that threaten occupational safety.

As a result of regular field controls and employee notifications carried out by the OHS Unit, 192 non-compliances were detected in 2018, 352 in 2019, and 243 in 2020. The increase in non-compliance notifications is considered to have emerged due to group-based rewarding activities initiated by the OHS unit towards the end of 2018. Although there has been an increase in the reports, OHS board meetings discussed all the casualties and took necessary measures to eliminate them.

At the end of the reporting year, it was decided that the available reward and punishment practice should be adopted by all departments and continued.



Customer Safety

At Eti Soda, we produce chemical components for various uses that are prominent in the lives of millions of people. Significant influence comes with great responsibility. Thus, we provide the safety of our products all the time to ensure our customers' health and safety.

Eti Soda products have been registered under the EU REACH Regulation. The pre-registration of our products for the Turkish REACH regulation was completed and we are planning to complete the registration process by the end of 2023. Safety data sheets of the products were prepared and sent to our customers in related languages.

At Eti Soda, the whole process is carried out in an enclosed system; all units are connected under automatically controlled conditions and monitored via software.

The developed food management system's standards are met, and our processes are audited both internally and externally. Traceability for all products is recorded and maintained, checked during traceability and recall tests.

Polyethylene packaging for sodium bicarbonate, polyethylene, and polypropylene packaging for heavy soda ash (sodium carbonate) is used in the production processes. Technical Specification Migration test reports and declaration of compliances are available for all packaging materials. EINECS, CAS numbers, production dates, recommended expiry dates, and GHS category of the products are indicated directly on the packaging.



Investment in Locals

From the villagers around our facility to employees and end consumers, all our stakeholders constitute Eti Soda's brand. Creating a community and maintaining the already existing one is valuable for today and the future. Growing is only possible with the support of our community. For that reason, Eti Soda strives to provide resources to the locals for the community's continuous development.

Infrastructure

The Eti Soda facility is located in an area surrounded by villages such as Bağözü, Çakıloba, and Başören. We have made infrastructural investments for those and other neighboring towns because infrastructure is deeply connected with the social and economic development of the local areas. We have provided financial support on construction work such as landscaping,

opening water wells, roads, canals, water arcs in addition to the supply of construction equipment, building wire fences for the protection of agricultural activities, repair, and maintenance of places such as mosques and cemeteries that the villagers commonly use. We have also supported social organizations financially and socially.



A Place for Grape Molasses Production in Bağözü and Çakıloba Villages

In the villages of Bağözü and Çakıloba, where viticulture activities are common, we have built a place for boiling molasses and handed it over to the villagers. The 80 m2 reinforced concrete structure with squeezing, shredding, separating machines, and four boilers inside, enabled the villagers to make molasses from the grapes they produce and add value to the local economy.

Irrigation System in Çakıloba and Başören Villages

In both Çakıloba and Başören Villages, an irrigation pool with a volume of 300 m3 and a hydrophore system with approximately 8000 meters of piping were established for agricultural irrigation purposes. The villages' agricultural production was supported by continuous clean water feeding from the factory to the pool. Before the irrigation system was installed, the fields had previously been irrigated with old-fashioned methods like draw wells. However, because of the inefficiency of the wells, water consumption was higher.



The Greenhouse Project

The Greenhouse Project is currently under development and has been approved by the Eti Soda leadership. It is an initiative that will make use of the residual steam created by the Eti Soda factory. At Eti Soda, in partnership with ANFA, a state-owned company, we are creating a greenhouse within the factory grounds, which will employ young women from local villages. ANFA is giving a purchase guarantee for the vegetables that will be grown in this greenhouse. The profit from this project will reportedly be distributed among the Çakıloba, Bağözü, and Başören villages. This project is aligned with the Ankara Municipality's efforts to increase vegetable farming in the region. The municipality started focusing on vegetable production after a sharp increase in the price of these goods. In addition, the project increases female employment from local region.

Agriculture

Agriculture, especially viticulture, is essential for the nearby villages of Eti Soda.

Eti Soda supports the local economy and villagers by creating environmental projects to maintain and protect the agricultural lands of the towns around the Eti Soda facility.

Exemplary Vineyards of Eti Soda

With the cooperation of academia, outstanding vineyards in the field of solution mining were built in 2009 in order to develop viticulture in the region and raise awareness and agricultural knowledge of the local people for improved outcomes. It aimed to introduce different and more productive grape varieties to the local villagers through training, with the purpose of developing the local viticulture.

Six different grape types are planted at the sample vineyard, of which three types are suitable for wine production, and the other three are for consumption as a fruit. Before the establishment of the Eti Soda vineyard, the locals of the Çakıloba, Bağözü, and Başören villages had not cultivated these types of grapes in their lands. The introduction of these new grapes and the collaborative education project had

drawn attention from the SEDEX Platform when submitted among the company's sustainability projects. In 2020, the project was shortlisted in the SEDEX Responsible Business Awards for the Best Environmental Sustainability Programme.

Eti Soda preserves the existing agricultural lands and distributes molasses and grapes free of charge to the local community. Increasing its vineyard area from 24 decares to 30 decares in 2020, Eti Soda owns a total of 80 acres of land in 2021, including the regions that embarked on the production responsibility from the villagers.

Afforestation

Trees have been planted along the Beypazarı-Çayırhan Highway by Eti Soda as part of a local afforestation initiative in 2019. There are plans to plant 2000 trees each year, as well as to water the area ourselves. Unfortunately, we postponed the project until 2020 because of the Covid-19 pandemic, but we've already planted 4220 trees, including cypress, walnut, almond, vine, and lilac.

Both biodiversity and climate change are essential to us, and we are committed to afforestation as a means of addressing both.



Statements of

Prof. Dr. Gökhan Söylemezoğlu,

Horticulture Department, Ankara University

and

Selami Damak,

Eti Soda Employee and a Resident of Çakıloba Village

on Eti Soda Demonstration Vineyard*

Prof. Dr. Gökhan Söylemezoğlu

“Eti Soda gives producers in the Beypazarı region significant support. The company’s primary aim has been to create projects in the region that allow these producers to become economically self-sustaining. With this aim in mind, the company established a demonstration vineyard in Beypazarı that utilized a modern wiring technique and cultivated grape types that were previously not grown locally. In addition to raising the profits of local producers by introducing new types of grapes into the region and by encouraging a transition to more modern viticulture methods through the establishment of the demonstration vineyard, Eti Soda has supported the local producers in all phases of viticulture by encouraging their attendance at grape cultivation and pruning demonstrations at the vineyard, by establishing training sessions and by organizing technical trips to vineyards using more modern viticulture techniques.

The local community has access to the demonstration vineyard at all times. They can see every step of the process if they wish to do so. Eti Soda has included Beypazarı-based agricultural bodies connected to the Ministry of Agriculture in every phase of this social responsibility project.

The company has given them information relating to the vineyard and has invited individuals employed in these agricultural bodies to its meetings to increase the impact of this project in the region and to make the project more sustainable.”

Selami Damak

“The Eti Soda Demonstration Vineyard has not only introduced new grapes to the Beypazarı region, but it has advanced local knowledge on viticulture methods.

I own a vineyard in Çakıloba. The Eti Soda Demonstration Vineyard initiative gave several training sessions to locals of the Çakıloba, Bağözü, and Başören villages. We were taken to a sample vine run by the Ankara University in Kalecik, Turkey, during one of the training sessions. It was the first time we saw the use of roses as a precautionary measure against the development of fungus in the vineyard. The Ankara University officials had planted roses on both sides of a single line of vines. We were told that fungus affects rose trees quicker than grapes, so they could be spotted on rose leaves and prevented before the illness took over all vines. Some of the villagers in Çakıloba adopted this, and I expect that more of the villagers will adopt it in the future. However, the most widely adopted technique we discovered from one of the training sessions was a pruning method shown by Professor Gökhan Söylemezoğlu. Before this session, we believed that the more branches/stems the grapevine had, the better it would be for us grape producers. But we learned that having only two stems, as opposed to the

4-5 stems we used to keep, is ideal for getting larger and richer grapes. This technique was adopted in the village widely and is being used to this day.

In addition to the training, the sample vines initiatives introduced new grapes into the region. In the vineyards, which I now oversee, we produce six different types of grapes. Three of these are made for eating and the rest for wine production. The grapes developed in the sample vines are used by Eti Soda and distributed to the company’s employees, senior management, and clients. However, in the process of developing these grapes, as already mentioned, many of the stems are pruned. After a period of waiting, these stems are injected with a substance that changes the type of grape produced by the stem. These stems are then distributed to the villagers on a first-come, first-serve basis. Since implementing this phase of the project seven years ago, at least 40 people a year have benefitted from this programme. One of my favourite grape types and the one primarily favored by producers in Çakıloba is the Redglobe grape. It is more durable than other grapes and has a more excellent value than previously used grapes. The villagers sell these grapes in markets and profit from it.”

**Following Eti Soda’s submission of the Eti Soda Demonstration Vineyard as an example of the company’s sustainability activities to the Sedex Responsible Business Awards 2020, a social activity audit, Eti Soda has been shortlisted for the Best Environmental Sustainability Program. The selected firms were acknowledged because they “implemented measures to safeguard their workers or their surroundings and improve environmental issues.” As a consequence of the Covid-19 epidemic, the awards conference was originally carried out on March 18th, 2020.*

Society

Eti Soda considers itself a part of the community in the area with its employees, from workers to management, and with its brand name.

Being able to sit at the same table with all villagers, participating in the same cultural activities for an integrated living and business style is extremely important for us.



From World Children's Day Festival

World Children's Day Festival

At Eti Soda, the '23 April Eti Soda Children's Festival' was held in 2019, in which our employees participated with their families. We are also planning to organize a joint event with Eti Soda and the Special Education School on this day in the future. Either the school and its students will go to the facility for the occasion or the employees will visit the school.

İftar with Locals

Every year in Ramadan, villagers of Bağözü, Çakıloba, Başören, Gurağaç and all Eti Soda employees and managers have iftar at Eti Soda facilities. With iftar activity, the local people get together, and Eti Soda employees knit up with villagers even more. Participating in cultural activities strengthens the heritage of the village and Eti Soda and enhances the corporate culture, which is utterly human-centered.

Local Community

By sponsoring the yearly Festival of Beypazarı and the Beypazarı Municipality Youth and Sports Club Association, we help the local arts and sports communities.

8 March International Working Women's Day

As Eti Soda, we maintain our belief in the empowerment and celebration of women. In order to show the value we place on female employees in our company, We take them out to dinner on 8 March Women's Day. Lunch organization was made in 2019; barbecue organization was made in 2020.

Education

Eti Soda aims to provide for all, especially for the disadvantaged. In a world where education is the most crucial tool for achieving comfort and wellbeing, establishing facilities of education and creating bright futures for children keep Eti Soda strong in its principles.

School for Children with Special Needs

Within the scope of the educational projects implemented by Eti Soda, Eti Soda Special Education School, with a capacity of 180 students, was built in the Beypazari district of Ankara. The School was established for disabled students, conforming to European standards. As a result of the studies initiated with the signature protocol carried out in Ankara Governorship, the school was completed and transferred to the Ministry of National Education in 2017. Eti Soda continues to communicate and regularly visits the school, offering its support for issues or necessities.



Professional Traineeship Opportunity for Local Students

We implement a traineeship programme for engineering students from technical high schools and universities. While the internships for university students approximately last one month, technical high school students have longer internships, lasting approximately four months. The internship applications are made on an ad hoc basis. Every year approximately 60 to 70 technical high school students have their traineeship at Eti Soda. As part of their traineeship programme, a representative from the high school meets Eti Soda employees to discuss the student's progress every week. While the internship programme accepts students from all regions in Turkey, the interns are predominantly from the Beypazari region.

Educational Videos

Eti Soda measurement control department has recorded educational videos and shared on YouTube about the solutions regarding the malfunctions of the machines in the facility.

The primary purpose of sharing videos on youtube was to build a local source library about instrumentation and control by publishing content in the Turkish language. We also intend to address similar issues globally by adding relevant subtitles.

Scholarship

We provide scholarships for some 30 university students in the Beypazari region. We believe that education is the first step to grow our country. All students deserve a more comfortable educational life.

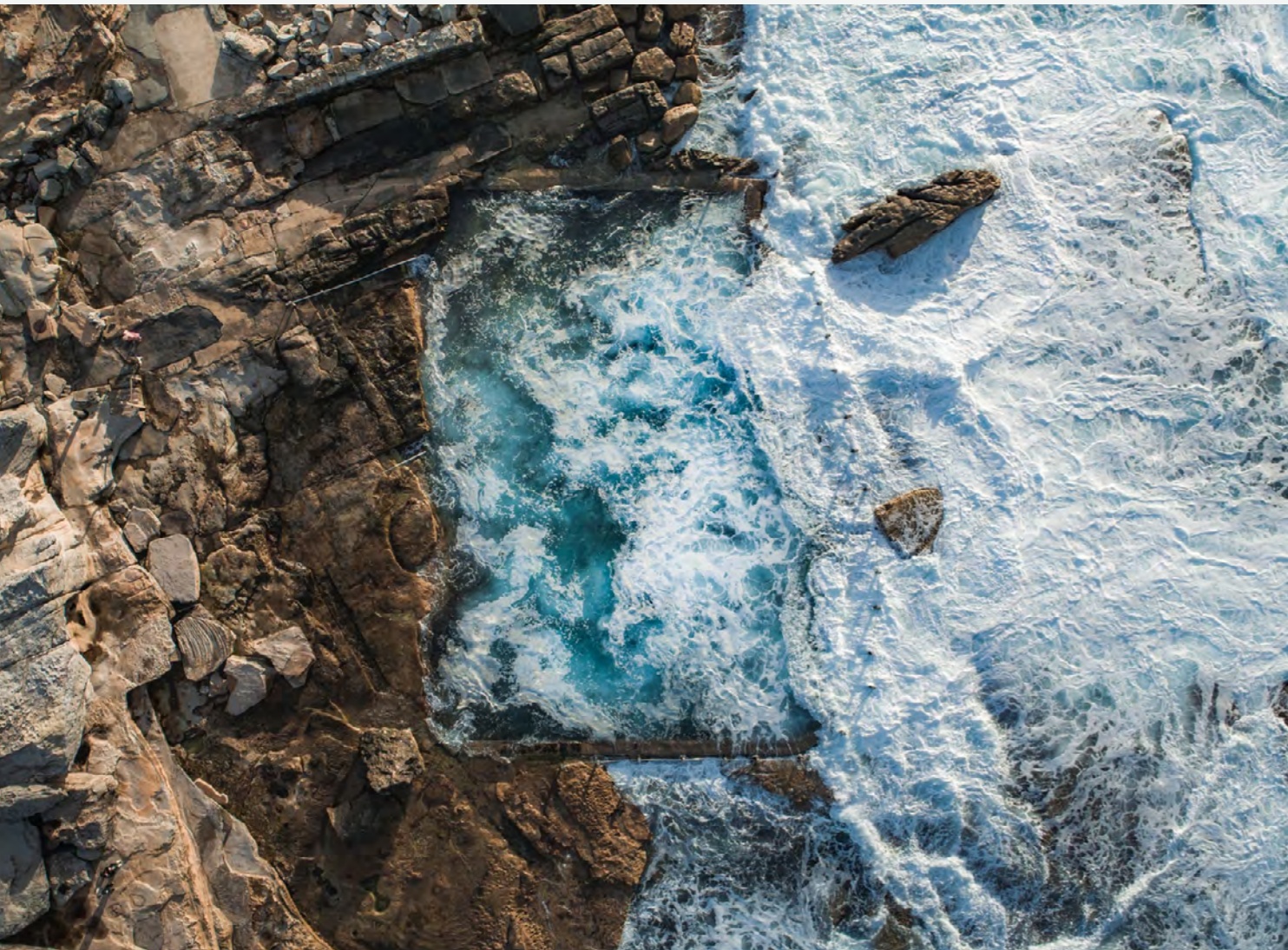
5

Hand in Hand with Nature

Hand in Hand with Nature

We have come a long way
in the Eti Soda journey with
nature in our minds.

Our company started its operations during the climate crisis, and the climate crisis probably will not go anywhere in the near future if corporations continue to avoid their responsibilities. Eti Soda has always kept itself environmentally friendly and does so in compliance with global regulations.



Our gratitude and respect for nature are so deep that Eti Soda is the first company that manufactures sodium carbonate (soda ash) and sodium bicarbonate using solution mining in Turkey.

All our business processes follow the international management standards; **ISO 9001** Quality management System, **ISO 14001** Environmental Management System, and **ISO 50001** Energy Management System. Our management of greenhouse gas emissions and water resources is based on calculations made according to **ISO 14046** and **ISO 14064** standards.

We have set targets such as low water consumption, waste minimization, and recovery/recycling, low emission, sustainable agricultural land protection, minimizing the effect on habitats. Eti Soda's corporate policies are shaped around the targets we have designated, which carry the purpose of protecting nature and the environment within the scope of our area of impact.

In Eti Soda's corporate policies, we emphasize the below-listed criteria.

- ☛ Taking a strategic approach and leadership in the areas of sectoral innovation, technological development, which are important for Eti Soda, and effective management of resources.
- ☛ Take measures to minimize the effects of harming human health and the environment.
- ☛ Preventing environmental pollution and factors accelerating climate change arising from our activities.
- ☛ Collecting the waste separately at their source and ensuring their recovery/recycling within the scope of "preventing or minimizing waste generation," which is the basis of the zero waste management principle.
- ☛ Sharing our policies and effective cooperation and communication with our customers, suppliers, contractors, employees, and all the people living around our facility.

Water

Water is irrefutably one of the most essential resources for all the living beings on Earth. Not only for living but also for production, water is indispensable. This importance makes it even more crucial to care for the use and disposal of it. As the UN World Water Development Report 2021 states, water stress is a problem that over two billion people experience by not being able to reach the available supply of fresh water. We are aware that water resources should be used cautiously in these conditions.

The sustainability of water resources is essential for global concerns such as food safety, economic growth, and climate change, all of which threaten the long-term habitability of our planet. And the water scarcity that is prevalent in several regions of the world, including Turkey, stands out as a primary risk for the health of communities and economies. The solution-mining technique used at Eti Soda facilities is highly dependent on the continuous supply of water, and disruption risks the continuity and health of our operational capacity.

Eti Soda's water management strategies are always up to date with global changes; thus creation and application of new policies stemming from brand new perspectives are widely expected.



We ensure water-related matters are evaluated through a wide-angle, bringing out long-reaching solutions.

Since 2018 water footprint calculations have been conducted at Eti Soda, which complies with ISO 14064 standard. Also, we have been receiving third-party verification for our results in addition to responding to the CDP Water since 2013.

Water constitutes the base for trona mining operations at Eti Soda. Solution mining technique, which is an environmentally friendly way of trona mining, injects heated water into the underground ore body, dissolving the trona forming a brine solution. The brine is then extracted to the surface and pumped to a central processing facility.

This closed-loop system has minimal impact on the surface, uses significantly less energy and water than other production methods.

Nevertheless, both water itself and steam are used in the process; thus, the availability of adequate amounts of quality freshwater is of prime importance for our operations. We supply fresh water from Sariyer Dam, where we measure 100% of water withdrawal volume constantly via water meters. In the case that freshwater

is not available, production capacity is at the risk of decreasing, which can result in financial consequences.

At Eti Soda, water risks are assessed annually as part of an enterprise risk management framework covering all operations of the company, using tools and resources such as World Resources Institute Aqueduct, ISO 31001 Risk Management Standard, Environmental Impact Assessment, Life Cycle Assessment, regional government databases, internal methods, and external consultants. Among the issues considered in these risk assessments are:

- Water availability,
- Water quality,
- Stakeholder conflicts concerning water resources,
- Implications of water on our key materials,
- Regulatory frameworks,
- Ecosystems and habitat,
- Access to fully functioning, safely managed WASH services

The two primary water-related risks that Eti Soda is closely observing are:

(1) the physical risk of increased water stress in the Sakarya river basin and the hydroelectric power plant dam, where we supply our water, which will significantly increase our operating costs through higher water and electricity prices;

(2) the regulatory risk of statutory water withdrawal limits reducing or disrupting our production capacity as we are directly dependent on water and any decrease in water supply reflects on our revenue. Aware of the impact of such risks, decreasing our dependence on excess amounts of water supply is among the highest sustainability objectives.

Total water withdrawn per ton of product is used as a metric internally for tracking our water performance. Water intensity has increased from 1.61 m³/ton in 2019 to 1.81 m³/ton in 2020 (a 12.41% increase). The reason for this increase is, due to Covid-19, we had to stop our operations a few times, and to restart the operations, we needed more water and more energy.

Recycled water use is a common application at Eti Soda, which accounts for 15–20% of our water demand.

We acquire recycled water by condensing the steam used in the process. On a monthly basis, water recovery/recycling in all our operations and facilities are monitored by water meters and flowmeters. Recycling is an application that we support and will keep using in the future because it reduces our use of fresh surface water, resulting in a decrease in costs and environmental impact of Eti Soda.

We have withdrawn an average of 3 million m³ per year in the reporting years of 2019 and 2020. Wastewater discharge occurred after being tested and approved in our wastewater treatment plants (WWTP). 100% of our discharge volumes are monitored and recorded. Beyseri River's dry waterbed and Zaviye River's dry waterbed are two discharge areas after which we treat 100% of the water in our industrial WWTP and domestic WWTP, respectively.



Recycling is an application that we support and will keep using in the future because it reduces our use of fresh surface water, resulting in a decrease in costs and environmental impact of Eti Soda.

The quality standards for water discharge are determined according to the relevant tables in the Water Pollution Control Regulation by evaluating the profile of wastewater receiving bodies and characteristics of wastewater. Weekly, the discharge water from both treatment facilities is analyzed in our laboratory in addition to the analysis performed by another accredited independent laboratory. The quality of our discharge water complies with the limit values determined in the Water Pollution Control Regulation. No case in which discharge standards are exceeded occurred during the reporting years.

In industrial wastewaters, the primary pollutants and criteria we control in testing are **pHs, temperature, fish bioassay, oil-grease, COD, chloride, sulfate, and iron.** pH, COD, BOD, and SS parameters are controlled in domestic wastewaters.

Sakarya Basin, where our facility is located, and we benefit from water resources, is classified as a region with a medium-high risk of water stress according to the World Resources Institute Aqueduct Water Risk Atlas. Our solution mining operations are highly dependent on water availability and the risk of disrupted water supply, and the unavailability directly threatens our production capacity, especially in the absence of an alternative water source.

Similarly, we predict that the risk of reduced water supply will reflect on the prices as increased demand and unavailability will increase the cost of one of our most essential resources. For this reason, we attach great importance to all our water-related sustainability efforts to minimize our water-related risks, our negative impact and not be affected by the drought that is a result of climate change.

CDP Climate Change and Water Programs 2020 Leader in Turkey

Non-profit organisation CDP operates the worldwide disclosure system enabling investors, corporations, nations, and regions to manage environmental impacts. CDP is seen as the global economy's gold standard for ecological reporting due to its extensive company and city actions dataset.

We have been disclosing our GHG emissions and water consumption values to the CDP platform since 2013. Eti Soda scored an A in the 2019 CDP Water Program and reached the Global Leadership level. In 2020, we received an A- and became the leader of Turkey.

Regarding the Climate Change scope, in 2019 and 2020, we scored B, which is in the management band. Additionally, in 2020, we received an A- Leadership rating in Supplier Engagement.

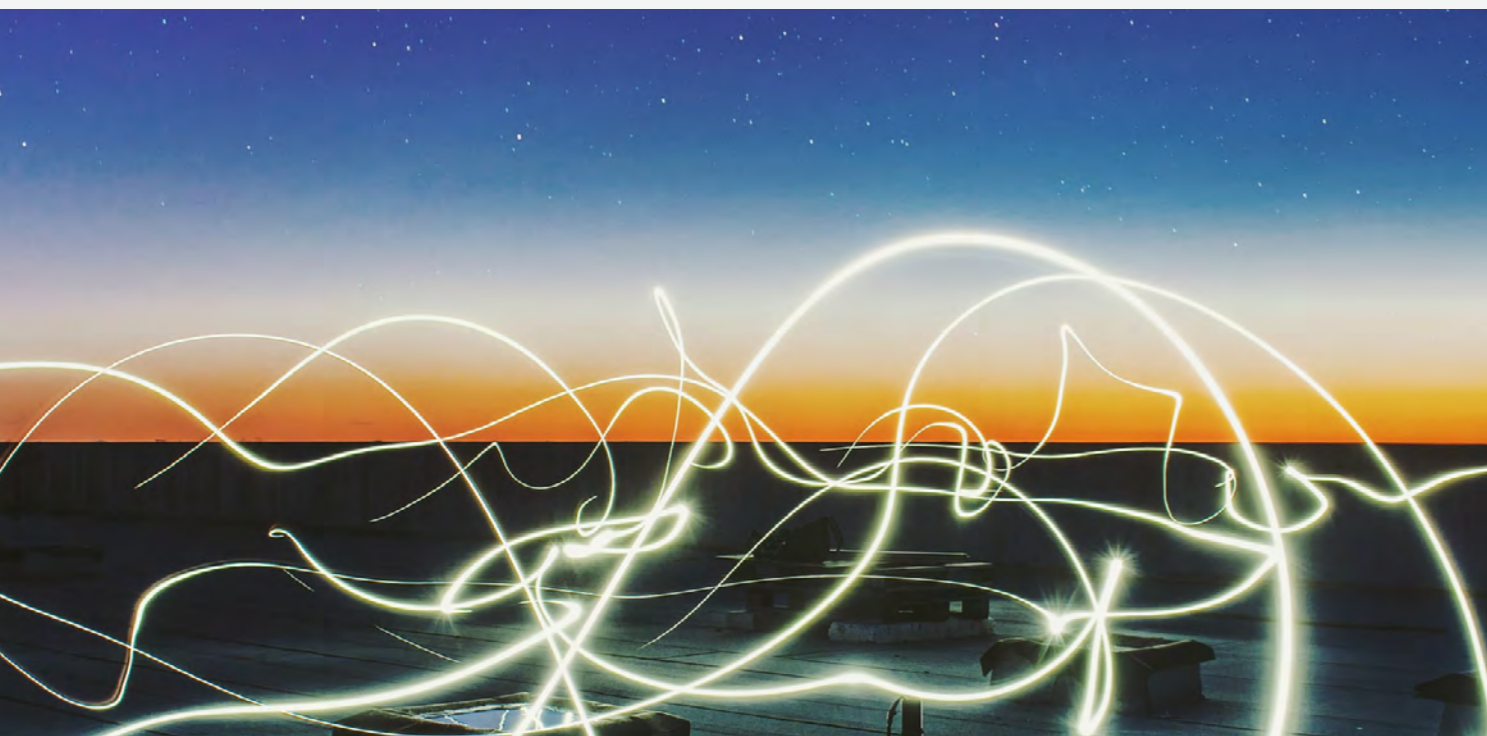
	2019	2020
Water withdrawn from the nature	2,989,875 m ³	3,185,567 m ³
Water recycled	713,854 lt	675,339 lt
Industrially treated water discharge	505,297 m ³	588,976 m ³
Domestic treated water discharge	35,305 m ³	34,683 m ³

Energy and Emissions

Protecting and maintaining the world's energy resources are highly crucial in this state of the world.

Responsible sourcing of energy and minimizing emissions will pave the way for a world where people, communities, nations, and businesses not only survive but thrive. Climate crises have affected people's lives in different ways and are disturbing the natural order of things. At Eti Soda, we put all our efforts into responsible energy consumption and managing our GHG emissions.

In our efforts to stand up against climate change, we focus on energy production and consumption of our processes where GHG emissions are high. We aim at energy efficiency during all operations in order to reduce GHG emissions through efficiency projects in addition to the plans on generating energy from renewable resources.



Energy Transition

At Eti Soda, energy is a crucial part of production as the primary process is energy-intensive, and the systems work continuously. Eti Soda needs to establish highly-efficient energy systems that can meet the intense energy requirements with a minimum negative impact on the environment. At the facility, Energy Production and Environment Departments are responsible for managing the improvement studies on our footprint on the energy-related impact on climate change.

The energy required for production at Eti Soda facilities is generated through various sources, one of which is the cogeneration plant established at the premises.

The plant is fueled with lignite coal and produces some electrical energy and all the steam required for the production process. In the reporting years, the electricity produced at the plant provided for more than 16% of the total power consumption. It reduced our electricity supply from the grid, providing two energy sources required for the production.

In the reporting years of 2019 and 2020, we have consumed 474 million and 451 million kWh of net electricity, respectively. In addition, we have used on average 63,800 TEP steam in our production process and equaled our respective total energy consumption to 199 million and 113 million TEP in 2019 and 2020. As a result of the change in production volume and total energy consumed, our energy intensity per ton of production remained the same at 0.064 (TEP/tons) through the reporting years.

	2019	2020
Electricity production	93,572,582 kWh	82,905,552 kWh
Total net electricity consumption	474,604,126.762 kWh	451,676,937.22 kWh
Total steam consumption	66,180.573 TEP	61,385.592 TEP
Total energy consumption	119,617.719 TEP	113,157.298 TEP
Total energy intensity (TEP/tons)	= 119,617.719 / 1,860,000 = 0.0643	= 113,157.298 / 1,763,000 = 0.0642

Carbon Footprint

Climate change continues to be a risk posed to our lives in both short-term and long-term periods. Our carbon footprint is like a label that shows what kind of an impact we have on our planet. Even though global emissions and thus carbon footprint of both people and organizations decreased due to lockdowns, it is on its way to bouncing back.

Therefore, we need a solid shift for greener economies where energy is resourced responsibly, waste generation is minimized, and proper recycling is done.

Whether they are living beings or not, all entities on Earth have a carbon footprint, including organizations such as Eti Soda. The carbon emissions of our business entity emerge by our operations. Therefore, we strive to limit our carbon footprint and reduce it in various ways as our responsibility.

Companies today take the initiative to reduce their carbon emissions more than ever before. Whether it is Science-Based Targets (SBT), renewable energy, or carbon neutralization, 163 out of 500 Fortune Companies are practicing a climate target type by 2019. Firms principally become responsible for complying with environmental regulations, increasing consumer awareness, and relying on a healthy planet. the European Green Deal. In this context, our European business partners that we export expect us to calculate our carbon footprint and set up reduction plans in compliance with the 2050 net-zero targets. Otherwise, this situation constitutes a risk for the company's sustainability.

However, we are well-resourced in this subject. We proactively initiated efforts to reduce our carbon emissions before the European Green Deal. Consequently, the carbon emission intensity value of Eti Soda products is 0.365, well below the average benchmark of 0.753 identified by the European Union.

Coal consumption might be the most considerable risk for our business climate targets as net-zero targets started to be set by our customers. We have conducted an EPD study to understand the impact of our products correctly and take a chance to strategize on this data. It turned out that our products emit 60% fewer GHGs per ton when compared to the synthetic alternative.

The year 2012 carbon emission has been set as the base year. Since 2018, carbon emission calculations and reporting have been carried out following the ISO 14064 standard. Besides, the calculations are verified by a third-party company. While Scope 1 and Scope 2 emissions were calculated and verified in 2018, Scope 3 emission values were calculated and added to the reporting in 2019 and 2020.

Emissions (metric tons CO₂ eq)	2012 <small>(base year)</small>	2019	2020
Direct GHG emissions (Scope 1)	470,749.85	437,184.00	435,144.65
Indirect GHG emissions (Scope 2)	192,606.10	218,181.00	207,550.00
Other indirect GHG emissions (Scope 3)	-	119,937.00	103,056.00
GHG emissions intensity (tCO ₂ eq/tons)	-	0.350	0.365
Total GHG emissions	663,355.95	775,302.25	745,751.01

Scope 1 emissions decreased by 2,039.26 tCO₂-e in 2020, compared to 2019. This reduction corresponds to 0.47% proportionally. Scope 2 emissions decreased by 10,631.05 tCO₂-e in 2020 compared to 2019, which corresponds to a rate of 4.87%. The amount of reduction that occurred in total (1+2) is 12,670.32 tCO₂-e with a rate of 1.93%. Scope 3 emissions of Eti Soda decreased by 16,881.20 tCO₂-e with a rate of 14.08% in 2020, compared to 2019. As the data shows, the GHG emissions intensity per ton of product increased in 2020 compared to the previous year. This occurred due to the adverse effect of the pandemic on the supply chains: delays in the shipping systems disrupted the production at Eti Soda through increasing the number of shortstops in production, which in turn increased the emissions intensity.

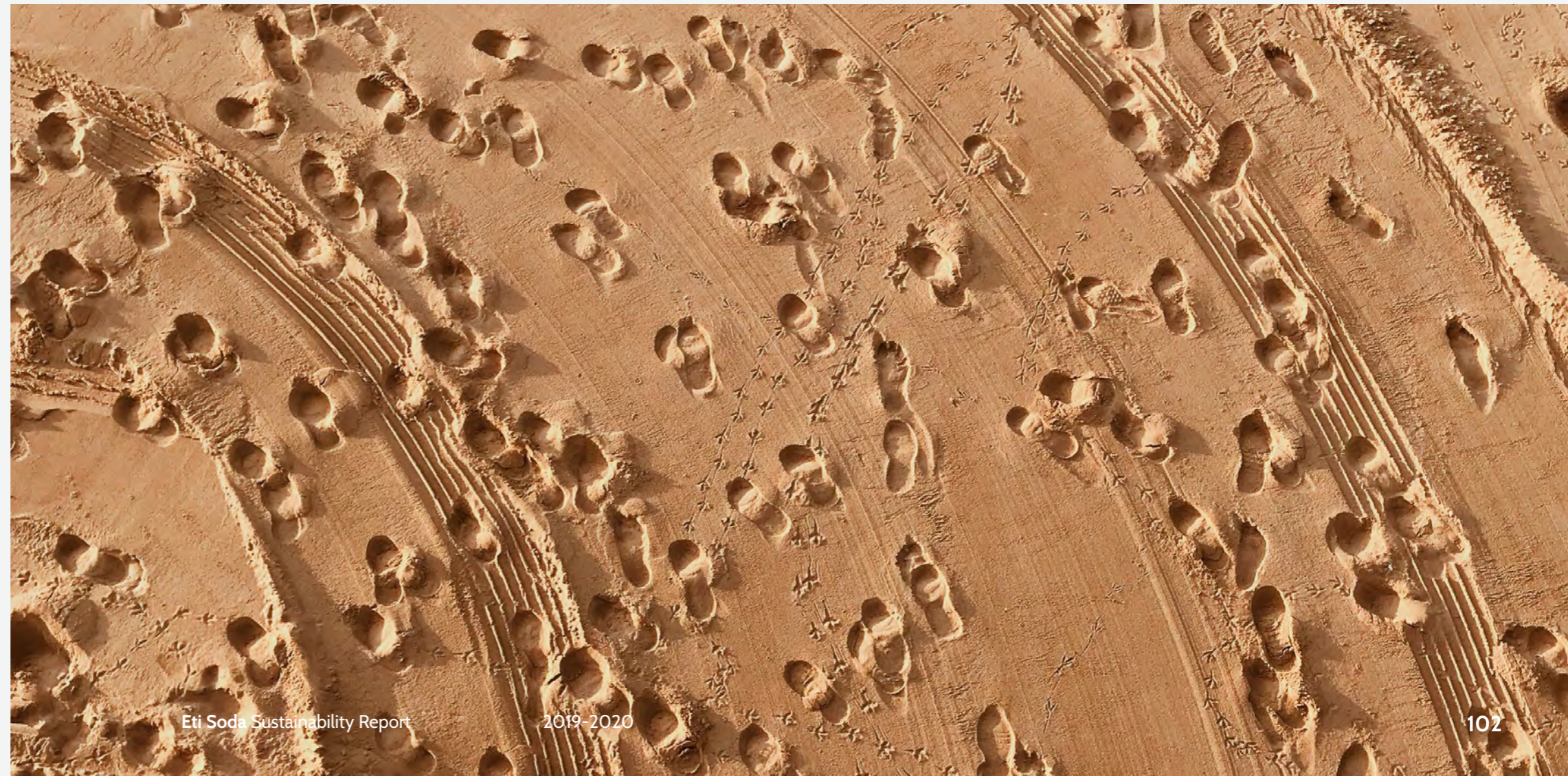
As Eti Soda, we are planning to commit to develop a science based target aligned with the SBTi criteria, submit the target to the SBTi for validation and publish our approved targets within a maximum of 24 months.

With this commitment, projects to reduce absolute emissions will be searched and integrated into company strategies.

In the Eti Soda facility, dust, CO, SO₂, and NO₂ parameters are monitored consistently in two cogeneration plants regarding the observance of air emissions. Emission confirmation measurements are made for dust, settling dust, and PM₁₀ once every two years for passive sampling parameters.

At Eti Soda, we continuously monitor our operations' impact on the environment and climate change.

We analyze the results and take necessary actions in order to improve our processes and products for a sustainable future. We follow world developments closely, keeping ourselves on track for the newest information and technologies, obtaining relevant certifications for optimizing our operations.



Environmental Product Declaration

Environmental impacts of products have been drawing attention like never before.

Declaring how a product performs in sustainable terms plays a vital role throughout the communication between organizations, manufacturers, and consumers. EPD certificates create and put forward a basis for the evaluation of the performance of products regarding environmental concerns.

With Eti Soda's newest implementations as part of its continuous improvement perspective, we received an EPD certificate on 07.12.2017.



This move works as a commitment to our social and environmental targets. Receiving an EPD certificate allows our business to support sustainable production even more by ensuring the efficient use of resources, minimizing unnecessary and financially burdening costs, and making it possible to produce environmentally friendly products.

Eti Soda makes its mark once again by becoming the first and only soda producer around the world that carries an Environmental Product Declaration certificate in sodium carbonate and sodium bicarbonate products. Our business approach, which centers around the environment and human factors, aims to introduce high-quality and natural products of Eti Soda into the economy.

As we already do, we will keep pioneering in our industry based on a socially responsible perspective with a dynamic, productive, and innovative team.

Our Environmental Product Declarations are published in the International EPD System, which is internationally accredited, and comply with the ISO 14025 and ISO 14040/44 standards. The EPD is produced on the basis of Life Cycle Assessment (LCA) study which is approved by a third-party validator. All the LCA studies and EPD certificates that we carried out are pertinent for the EPD Programme Operators for five years. We value staying up-to-date in our business approach; thus, we renewed our EPD and LCA studies in 2020 even though it was unnecessary for two more years.

Biodiversity

We are cautious when it comes to issues that might otherwise stay invisible, such as protecting the ecosystem and maintaining biodiversity in our impact area. We pursue to gain a complete understanding of our potential impacts, prevent any mistakes with insights coming from our perspective and counteract against negativities.

We develop projects on biodiversity in the Beypazari, Ankara region to reveal the region's characteristics. For this reason, in 2021, a joint study was initiated with Ekoiz, an environmental consultancy company, that includes preparing a plant inventory of our region. This study will enable us to realize, protect, and promote the endemic species and wildlife native to this region.

Eti Soda vineyards were established in order to reveal the endemic grape species in Beypazari and raise these species. In Eti Soda vineyards, the highly efficient production of grapes with the right methods is aimed.

We have provided training to villagers in the aforementioned vineyards to adopt endemic grape species, protect them and use them as a new economic resource.

In addition to vineyards, Eti Soda ensures the sustainability of the agricultural lands in the region by continuing to farm these areas to maintain local economic activities and resources.

Eti Soda has many more future projects for the protection of biodiversity.

The "Eti Soda Biodiversity Detection and Preparation of Action Plan Project" aims to detect the details of biodiversity in the licensed area. Preparation of the inventory is still in the process, and it is expected to finish in November 2021. Critical species will be detected after determining the biodiversity around the Eti Soda licensed areas. Action plans will be prepared for the species and habitats that require monitoring to protect and preserve biodiversity.



The "Eti Soda Biodiversity Detection and Preparation of Action Plan Project" aims to detect the details of biodiversity in the licensed area.

Waste

For Eti Soda, an essential issue in the area of environmental protection is not only maintaining the technology regime and high quality of products, but also minimising adverse environmental impact by limiting pollution emissions to the atmosphere, waters, and soil, rational waste management, and optimisation of energy consumption per tonne of output.

As we take the initiative to establish a Zero Waste Management System within our organization, the environmental unit has obtained a Zero Waste

Document in the scope of the Zero Waste Code. In the context of continuous developments through 2021, we will focus our work on raising the Zero Waste Document to the Platinum level.

Our research on ensuring waste management from generation to disposal without harming the environment or human health, reducing waste generation, using natural resources, and ensuring waste management through methods such as waste reuse, recycling, and recovery demonstrates the importance we place on the

environment and human health.

We classify the wastes generated by our operations in Eti Soda as hazardous or non-hazardous, and we cooperate with approved waste companies to segregate and dispose of hazardous materials most acceptably. In addition,

we create software to help people during this waste management process. We have taken all required steps to keep and segregate our waste within our facility with the minimum harm to the environment and people. In addition, all necessary follow-ups and measurements have been made.



* Disposal method	Hazardous waste		Non-hazardous waste	
	2019	2020	2019	2020
Incineration	31 kg	75 kg	21 kg	7 kg
Exchange of waste for any of the process R1 to R11	740 kg	960 kg	1,274,592 kg	270,480 kg
Temporary storage	33,340 kg	46,127 kg	3900 kg	1760 kg
Landfill	-	-	78,852,380 kg	67,032,690 kg
Reclamation/recycling of metals	6020 kg	9060 kg	-	-
Refining or reuse of oils	2300 kg	35,540 kg	-	-
Alternative raw material	-	-	35,979,820 kg	61,194,440 kg
Reclamation/recycling of other inorganic materials	-	-	-	42,520 kg

*Our hazardous wastes are delivered to licensed companies for disposal in the most appropriate way and to minimize damage to the environment. There were no accidental waste dumps in the reporting years 2019 and 2020.

6

Hand in Hand with Industry

Global Leadership

At Eti Soda, we know that the road to global leadership must be maintained on the basis of innovation. We use the innovative solution mining technology in the world's most modern and cost-effective production facilities.

We aim to demonstrate a sustainable approach worldwide in soda production with solution mining technology, both safe and environmentally friendly.

We are the company that produces the most qualified soda ash with high purity in the world. Every stage of our production process is monitored and tested. We use digitalization effectively in our production processes and prevent possible losses by analyzing the risks and costs that may occur.

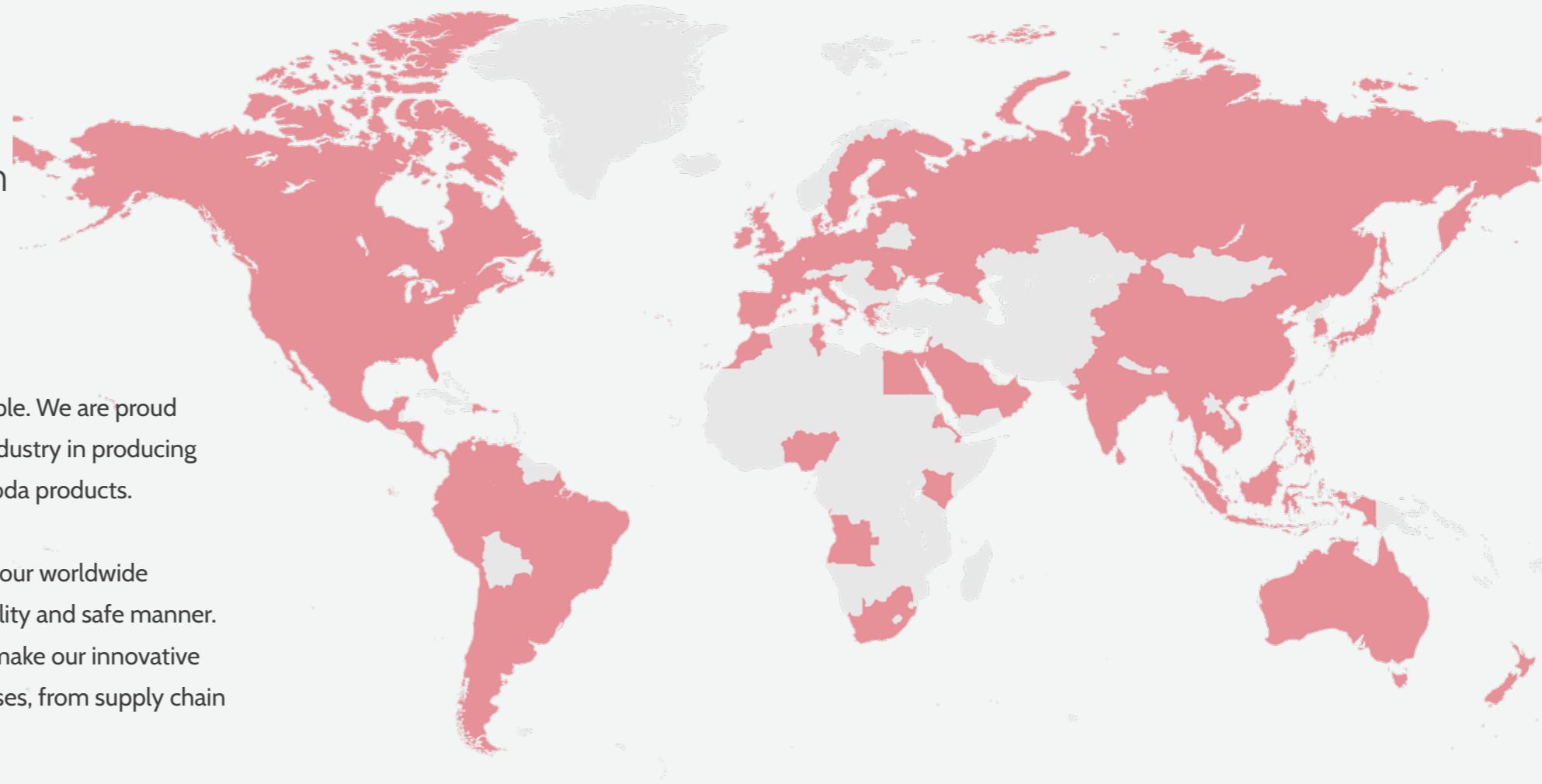
At Eti Soda, we are the first and only company in the world to have an Environmental Product Declaration (EPD) in the production of sodium carbonate and sodium bicarbonate. By transparently monitoring the environmental effects of our products, we minimize the

damage to nature and people. We are proud of being a pioneer in the industry in producing environmentally friendly soda products.

We deliver our products to our worldwide customer portfolio in a quality and safe manner. For this reason, we aim to make our innovative leadership in all our processes, from supply chain to distribution, sustainable.

Based on the products produced, our turnover in 2019 was 2,016,477,216 TL, which increased to 2,292,993,903 TL in 2020.

Together with the improvements and regulations we have made in the industry, where we assume the role of the global leader, we benefit from government incentives at a high rate, and we support the local economy with the revenues obtained.



Countries that make up our sales network:

USA, Germany, Angola, Argentina, Australia, United Arab Emirates, Bangladesh, Belgium, Benin, Brasil, Djibouti, Czech Republic, China, Denmark, Dominican Rep., Ecuador, Indonesia, Eritrea, Estonia, Morocco, Philippines, Finland, France, Guatemala, South Africa, South Korea, India, Netherlands, Honduras, England, Ireland, Spain, Israel, Sweden, Italy, Japan, Cambodia, Canada, Kenya, Colombia, Costa Rica, Latvia, Lithuania, Lebanon, Malaysia, Mexico, Egypt, Myanmar, Nigeria, Nicaragua, Panama, Paraguay, Peru, Poland, Portugal, Puerto Rico, Romania, Russian Fed., Slovenia, Singapore, Sri Lanka, Saudi Arabia, Chile, Thailand, Taiwan, Trinidad, Tobago, Tunisia, Ukraine, Oman, Uruguay, Jordan, Venezuela, Vietnam, New Zealand, Greece

Sales and Export



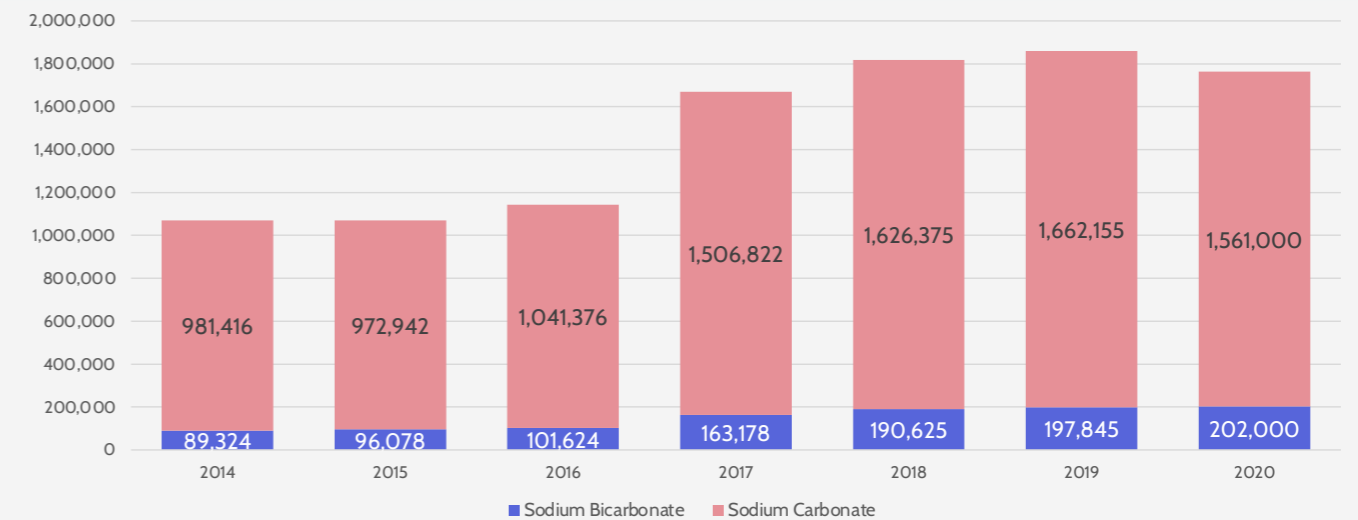
At Eti Soda, customer orientation is an essential principle of our approach to business. Customers are considered among the company's key stakeholders, and strategising according to customer interests and concerns strengthens our relationships throughout our value chain. Our sales and marketing processes adopt a customer-centric approach, addressing the needs and expectations understood and defined through stakeholder engagements such as regular meetings, account management processes, audits, visits, and media.

The corporate strategy towards solid relationships in business is built on:

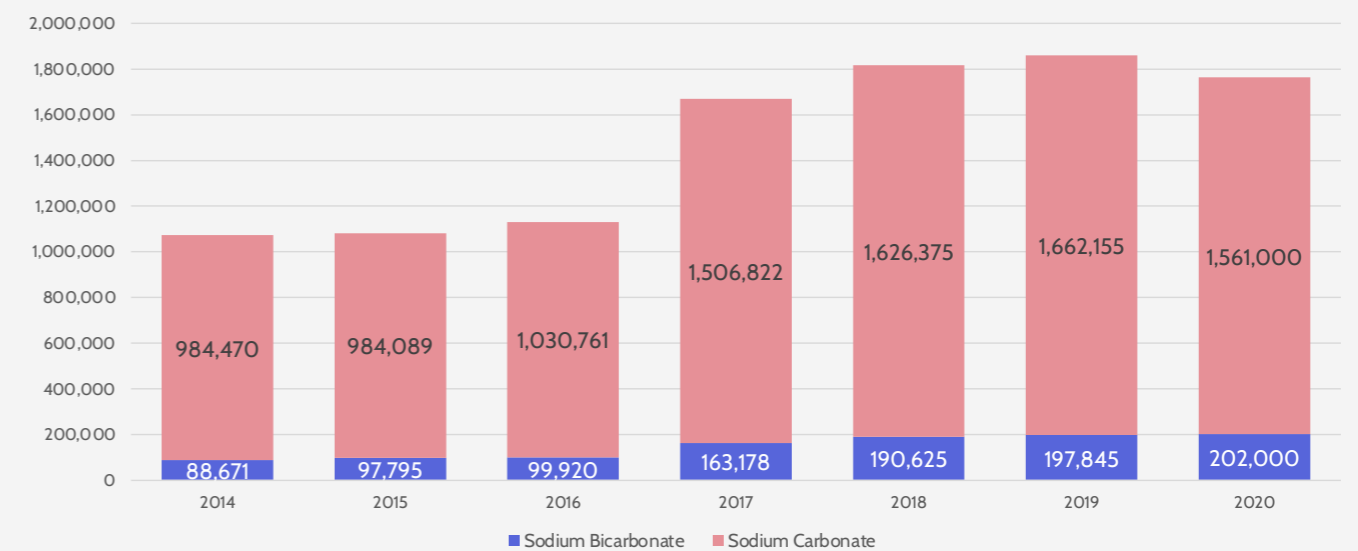
1. Managing the right conditions in sales for existing and prospective customers.
2. Pricing the product to maximize revenue and profits in the current market conditions.
3. Analyzing the risks concerning customer satisfaction and taking required actions.
4. Ensuring the coordination between units for seamless aftersale activities.
5. Observing the market and determining penetration points.
6. Growing the existing customer base.

The current sales network at Eti Soda expands from Europe to Africa, from the Americas to Asia, including the Middle East and the island nations, to over 70 countries.

AMOUNT of PRODUCTION (tons)



AMOUNT of NET SALES (tons)



Responsible Supply Chain

The supply chain covers all raw material, material, and service purchase and sale processes that Eti Soda carries out in order to offer more sustainable products and services to its customers. In this context, relations with the supply chain are carried out under both applicable laws and ethical principles of Eti Soda.

Eti Soda controls and confirms that its suppliers both work in harmony with human rights and adopt a responsible management approach towards third parties.

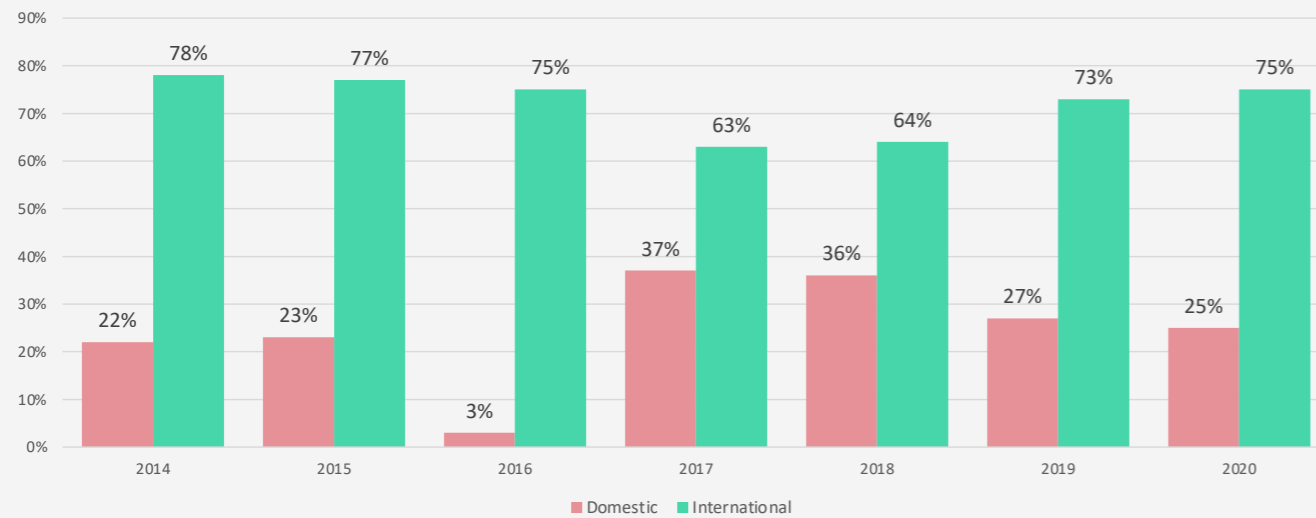
Our suppliers; are companies that do not discriminate within the scope of human rights; child labor and forced labor are not approved. In addition, Eti Soda's suppliers are companies that are sensitive to the environment and climate change, provide long-term trust towards their customers, are respectful, and do not violate the intellectual property rights of third parties. We see our suppliers' positive and negative aspects as our own value, and therefore, we care that the companies we work with act following ethical values and laws at every stage of our supply chain.

Our suppliers have to complete our Supplier Sustainability Assessment Questionnaire according to our procurement policy. In 2020, the Supplier Sustainability Assessment Questionnaire was sent to all of our active suppliers, and 28% reported back sufficiently on environmental questions. As an incentive for the suppliers to report, the suppliers with a satisfactory score in their sustainability assessment questionnaire are qualified to be included in our "Approved Supplier List."

We endeavor to build and maintain a close relationship with our suppliers that enable Eti Soda to manage the supply chain requirements, both technical and ethical, in an effective way. As part of this effort, we have started to organize Supplier Day, during which we share our sustainability priorities with the suppliers. Only suppliers from the approved supplier pool are invited to the event.

In 2019, 13 out of 15 suppliers joined us on Supplier Day, and in 2020, we organized an online event due to the pandemic conditions, and 38 out of 50 invited suppliers were in attendance.

NET SELLING RATES



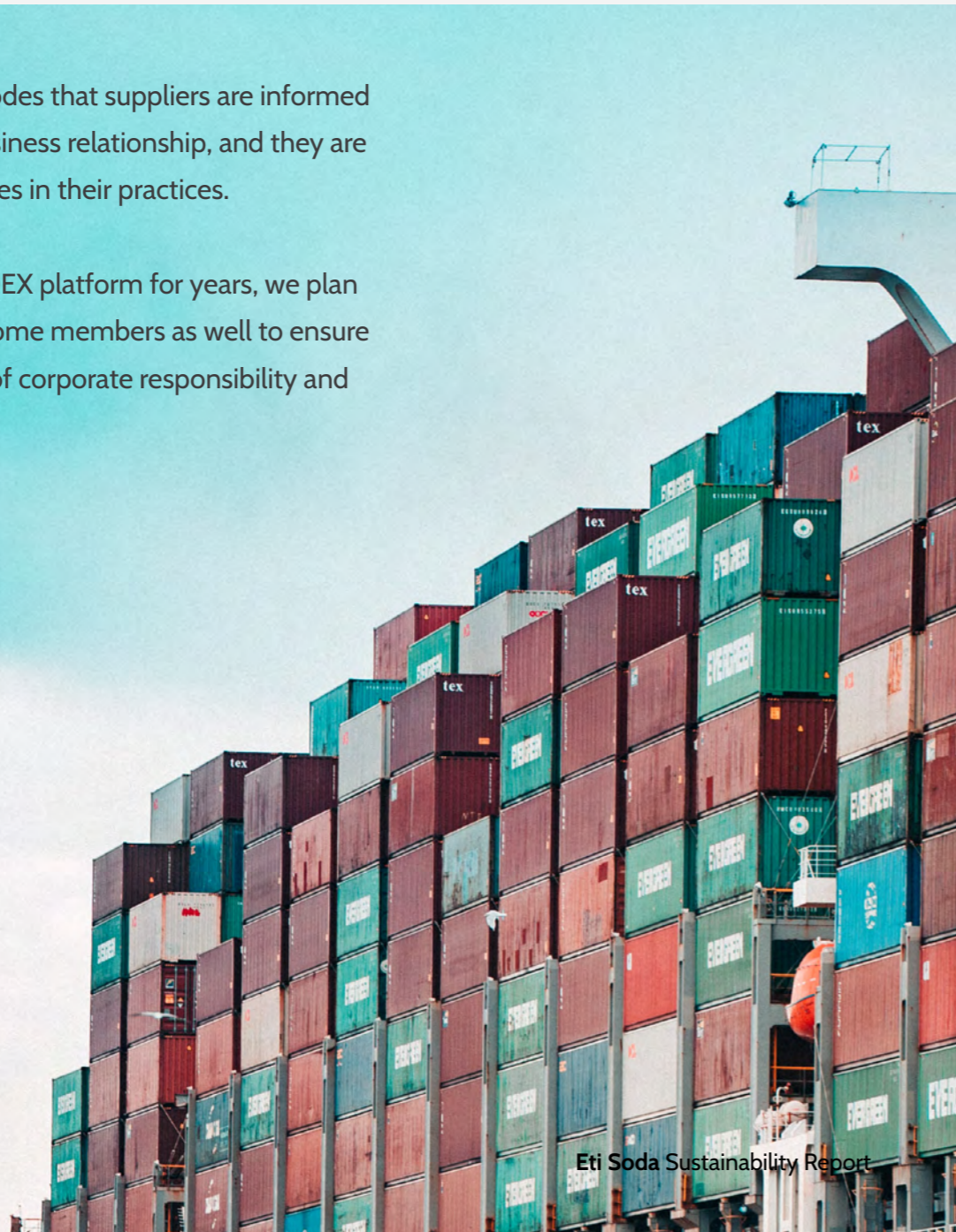
TOP 5 MOST EXPORTED COUNTRIES (tons)

Country	2019	Country	2020
Turkey	494,248	Turkey	451,566
India	203,934	Italy	167,675
Spain	134,997	Spain	106,175
Italy	128,741	UK	98,490
UK	84,120	Portugal	83,325

Approaching the supply chain as a “value chain,” we have taken specific steps to expand our impact and sustainability values.

Eti Soda has supplier ethical codes that suppliers are informed about from the start of our business relationship, and they are required to abide by these codes in their practices.

Next, As a member of the SEDEX platform for years, we plan to require our suppliers to become members as well to ensure supply chain-wide alignment of corporate responsibility and ethical trading principles.



Innovation

At Eti Soda, we value digitalization and innovation in order to increase our brand value and offer a sustainable production and service approach. Instead of complicated and costly processes, which form the basis of soda production, we invest in technologies such as solution mining technology that encourages the reduction of occupational accidents, full-capacity resource utilization, and lower economic losses.

Internal Eti Soda production and quality control departments conduct scientific joint research studies into the commercial production systems.

As a result, the projects maximizing the efficiency of production systems are delivered, and the projects evaluated within the scope of sustainability are supported. In addition, we contributed two separate articles to the academic literature by examining the data captured due to the projects carried out by the Mechanical Maintenance team to increase equipment efficiency.

At Eti Soda, we benefited from the tax advantages of both 85,543,095 TL from patent grants and 85,363,349 TL from the investment discounts in 2019; both 95,315,327 TL from patent grants and 70,853,088 TL from the investment discounts in 2020.

Tax advantage	2019	2020
Patent Grant	₺85,543,095	₺95,315,327
Investment Discount	₺85,363,349	₺70,853,088

Customer Relations

Valuable communication skills are vital while interacting with the customers.

We create a rapport with our customers by maintaining interactive, effective, and transparent communication. Customer Relations Management department interacts with the clients before and after the sales process to identify their needs and expectations, define customized conditions for the client, and consider recommendations and complaints after the sales process. We fulfill customer requests by utilizing a database management system where every request is stored and traced. Complaints are reviewed in the meetings held with executives.

The active cooperation between departments is one of the aspects that makes our customer service unique. We do our visits with a cross-departmental team consisting of Customer Relations, Quality Control, Foreign Trade and Logistics, and Sales-Marketing unit members. On the other hand, our customers are always welcome for site visits to demonstrate how the production lines work physically.

The customer satisfaction rate is determined by the surveys held at the end of each year. Surveys include different sectors of sales service, delivery processes, product quality, and customer service to see what we achieve and to identify the areas for improvement. Results of the surveys are evaluated with the relevant process owners and executives. The surveys show that we have increased customer satisfaction by around 15% in 4 years.

As Eti Soda, we ensure that our customers can convey their complaints and suggestions to us quickly and easily. The number of customer complaints was 16 in 2017; It was 25 in 2018, 29 in 2019, and 21 in 2020. The decrease in the number of container shipments can be shown as the decrease in customer complaints in 2020 compared to 2019. In 2019, the reason for receiving more complaints was the higher sales of packaged products than bulk products.



We further improve our activities by accepting all positive and negative feedback about the products and services to our customers, who are our most valuable stakeholders.

Customer Satisfaction

2016	2017	2018	2019	2020
85%	80%	85%	95%	93%

Visits to Customers

2016	2017	2018	2019	2020
12	31	9	10	10

Customer Request

2016	2017	2018	2019	2020
76	195	174	130	199

We organize meetings regarding incoming customer complaints and suggestions to ensure customer satisfaction by taking necessary actions. Eti Soda's customer satisfaction rate has increased since 2016; in 2020, this rate reached 93%.

Business Ethics

Business Ethics Rules have expressed the principles and values which have been valid and leader in all business processes of Eti Soda. Topics like working conditions, modern slavery, human trafficking, bribery, money laundering, gifts-events, information security, engaging in non-governmental organizations or political activity, etc., are considered in the scope of business ethics.

As a member of SEDEX, one of the world's leading ethical trade membership organizations, we act to improve our employees' working conditions and our suppliers and subcontractors to expand our moral values and positive impact.

We adopt a continuous improvement approach to our employees' conditions and assess its value annually as the platform audits us.

Eti Soda has acted against bribery and corruption to comply with both national and international laws. Occurring unethical topics both within and out of corporate offices is evaluated in a transparent manner in the scope of the ethics committee of Eti Soda. Our Quality Assurance Department reports to the Anti-Corruption and Compliance Coordinator annually. With the awareness of a competitive market, we have acted to comply with rules and regulations in activities carried out about bribery and corruption. We have ended our business relationship with parties offering bribery and corruption. Our employees are obliged not to violate intellectual property rights and avoid anti-corruption factors.

Modern slavery is a fundamental violation of human rights and must be struggled globally.

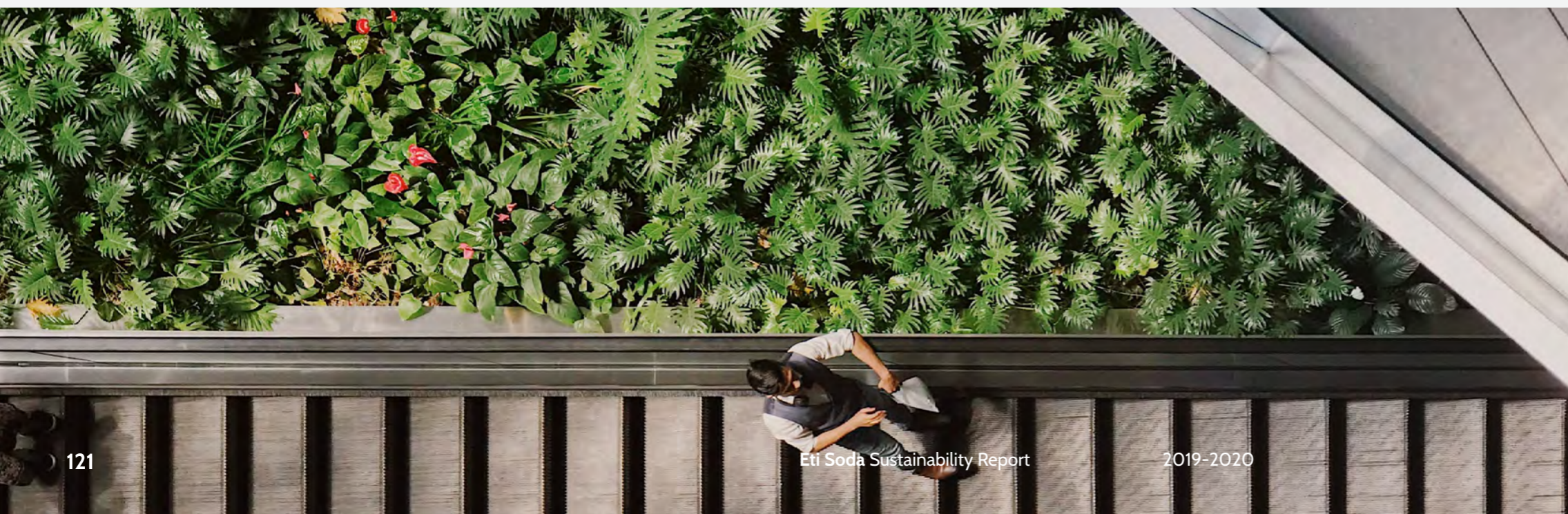
In 2020 Eti Soda established Anti Slavery and Human Trafficking Policy.

We are committed to developing, implementing, and controlling systems that aim to ensure that modern slavery does not occur in any area of our organization or at any stage of our supply chain.

Eti Soda Ethical Codes was established to guide us in all our business processes in accordance with our basic principles and values.

We undertake to work and maintain our relations with all stakeholders we interact with in our internal operations and in line with the principles of honesty, reliability, transparency and accountability within the framework of the rules in this guide.

In order to guide our employees and stakeholders to report any legal, policy, or ethical code violations that they detect or suspect in good faith based on confidentiality, without being subject to any retaliation or grievance, we formed Whistleblowing Policy. In the scope of this policy, **the Ethics Committee is responsible for investigating and concluding the complaints and claims reported.**



Data Protection

Our company is acutely aware of the confidentiality and security of personal data. It aims to fulfill the requirements for compliance with the relevant legislation and establish a Data Protection and Processing Policy in international standards. Our business operates based on the principles of legality, honesty, and transparency in the protection and processing of personal data.

Our company meets the fundamental principles and conditions in the legislation regarding the protection and processing of personal data

Our employees follow these principles with heightened awareness, and all activities are carried out in compliance.

Under the Constitution and Personal Data Protection Law, the process of personal data is allowed to be carried out only in the situations listed below.

- Retaining the explicit consent of the personal data owner
- Must be explicitly provided by the laws
- Failure to obtain the explicit consent of the person due to de facto
- Direct relation with the establishment or performance of the contract
- Fulfillment of legal liability
- Making personal data public by the personal data owner
- Mandatory data processing for the establishment or protection of a right
- Mandatory data processing due to legitimate interests

Eti Soda initiated the implementation of the ISO 27001 Information Security Management System in 2018 to ensure the security of all corporate and personal data in the most appropriate way. In this context, in 2019, the need to revise the institutional procedures by the Personal Data Protection Law requirements arose.

In 2020, all relevant regulations were completed, and data minimization was achieved.



Local Economy

At Eti Soda, we care about supporting the local economy in all processes, from raw material supply to the sale of products.



Primarily, we support the local people in our region, Beypazari, Ankara, with investments in infrastructure, production facilities, and consultancy in areas that will improve their social and economic circumstances in the short to long term.

Infrastructure

have renewed the village road used both by our facility and local people.

Production Facilities

We have contributed to the local economy by making the grape molasses production facility building in the scope of local people's use and social responsibility projects.

Consultant

With university contributions, we have given consultancy and training to local people for producing grapes in vineyards.

Accessible Energy Resources

Within the scope of "Good Agriculture" applications, we have made the irrigation ponds, and electricity lines in villages close to our production facility.

At Eti Soda, we indirectly contribute to the local economy by affecting the local community's socioeconomic life in Beypazari, Ankara. At the same time, we contribute to the local economy directly by working with local suppliers in our supply of products and services.

7 | Appendices

Performance Data

Financial Data

	2016	2017	2018	2019	2020
Production Volume (tons)	1,143,000	1,670,000	1,817,000	1,860,000	1,763,000
Net Product Sales (tons)	1,130,681	1,666,443	1,822,841	1,825,928	1,772,905
By Region					
Turkey (tons)	28,679	617,463	660,307	494,234	451,566
Europe (tons)	777,733	710,817	602,635	607,809.43	722,435
Others (tons)	66,158	338,163	559,899	723,884.64	598,904
By Product Group					
Dense Soda Ash (tons)	1,030,761	1,506,822	1,626,375	1,662,155	1,561,000
Sodium Bicarbonate (Tons)	99,92	163,178	190,625	197,845	202
Profit Before Tax (Million €)*	93.3	143.28	161.46	185.09	183.72
Total Assets (Million €)	451.72	535.28	383.86	417.61	633.04

* THE ANNUAL AVERAGE OF THE CENTRAL BANK OF THE REPUBLIC OF TURKEY WAS USED

Financial Data

	2016	2017	2018	2019	2020
Total Short Term Liabilities (Million €)	227.65	222.23	157.83	171.11	273.28
Total Liabilities (Million €)	311.62	284.01	177.27	189.51	289.29
Shareholder's Equity (Million €)	140.1	251.27	206.58	228.10	343.75
Paid Dividends (Million €)	79.1	90.33	43.61	142.18	0.80
Investment Expenditures (Million €)	126.95	39.81	24.34	11.83	6.09
Dividends (Million €)	79.1	105.12	131.2	154.21	147.51
Staff Expenses (Million ₺)	27.54	38.03	45.39	56.27	69.18
Corporate Tax Paid To the Government (Million ₺)**	45.11	32.14	65.92	88.72	159.60
Social Responsibility Projects (Million ₺)	3.01	2.05	3.17	1.65	2.21

** INCLUDING ACCRUAL + INVESTMENT DISCOUNT withholding tax

Performance Data

Social Data

Employee Distribution According to their Status

	2016	2017	2018	2019	2020
Blue Collar	370	398	401	432	432
White Collar	104	107	115	140	143
Total	474	505	516	572	575

Employee Distribution According to Contract Type

Permanent	464	483	514	571	563
Temporary	10	22	2	1	12
Total	474	505	516	572	575

Employee Distribution According to Gender

Men	426	455	463	517	509
Women	48	50	53	55	66
Total	474	505	516	572	575

Social Data

Employee Distribution According to Age Group

	2016	2017	2018	2019	2020
>30	125	143	132	416	418
30-50	330	341	364	150	152
50<	19	21	20	6	5
Total	474	505	516	572	575

Distribution of Employees According to being Native or Foreigner

Native	474	505	516	572	575
Foreigner	0	0	0	0	0
Total	474	505	516	572	575

Occupational Safety Data

Accident Frequency Rate (AFR)	42	39	29	25	27
Accident Weight Ratio (AWR)	0.34	0.40	0.25	0.27	0.24
General Accident Rate (GAR)	8609	8216	6166	5243	4918

Performance Data

Environment Data

Greenhouse Gas Emission (metric ton/year CO₂)***

	2012	2016	2017	2018	2019	2020
Scope 1	470,749.85	321,692.58	464,846.84	441,892	437,184	435,145
Scope 2	192,606.10	-	-	227,166	218,181	207,55
Scope 3	-	-	-	123,613	119,937	103,056
Total	663,355.95	-	-	792,671	775,302	745,751

Consumption

Trona (tons)	1,975,100	2,907,834	2,925,703	2,991,008	2,803,819
Energy (MWh)	393,762	392,196	503,693	469,710.54	445,289.63
Water (m ³)	1,805,902	2,858,330	3,039,140	2,989,875	3,185,567
Discharge Water (m ³)	296,037	400,196	553,882	540,602	623,659

*** The data for the years 2018, 2019, 2020 were calculated according to the ISO 14064 standard and verified by third party audit company; BSI.

Environment Data

Waste (ton)	2016	2017	2018	2019	2020
Hazardous	49.5	77.5	40.46	43.17	90.407
Medical Waste	0.042	0.039	0.036	0.042	0.082
Non-hazardous					
Fly Ash and Slag	71,893	114,595	131,421	115,583	128,227
Scrap Waste	530.36	733.96	639.83	363.6	151.06
Packing Waste	80.1	131.66	15	19.74	148.14
Total	72,503.46	115,460.62	132,075.83	115,966	128,526
Pollutant Load Chemical Oxygen Demand (COD) (ton/year)					
Domestic Treatment	-	-	2.4	3.22	2.84
Industrial Treatment	-	-	64.99	30.32	76.12
Waste water amount (m³)					
Domestic	14,400	16,000	21,155	35,305	34,683
Industrial	283,847	384,196	532,727	505,297	588,976

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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.

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