

DATE - NUMBER: 09.03.2022 / Gap Analysis Report Number: 22- 02AR-002307

TOPIC: Modern Slavery - Independent Opinion Statement

COMPANY: Kazan Soda Elektrik Üretim A.Ş.

SCOPE AND OBJECTIVES

With the special request of Kazan Soda Elektrik Üretim A.Ş (the company), an independent assessment and GAP analysis was carried out on Modern Slavery and Human Trafficking. Legal legislation, ILO contracts and good practice guidelines were taken into account in this evaluation.

Within the scope of the independent assessment and current situation analysis, Included in Annex 1 "Evaluation and Investigation Report on Prevention of Modern Slavery and Human Trafficking" has been prepared. Compliance and issues open to improvement are defined in the checklists used within the scope of reporting.

INDEPENDENCE / GAP ANALYSIS COMPANY

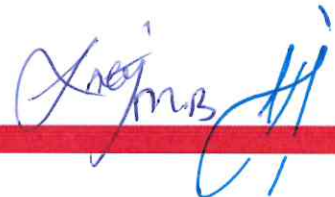
The company that prepared the audit report and the assigned experts did not take part in the establishment and training of Kaza Soda Elektrik Üretim A.Ş. Modern Slavery prevention policies, management systems. They have carried out an objective and independent assessment.

This evaluation was carried out with TRB International Certification Company and MET HSE & Wellbeing Center Partnership.

The GAP analysis team was composed of lead auditors, lawyers (labor law) health, safety and wellbeing professionals experienced in industrial sector, and trained in a range of sustainability, legal regulations, quality, health and safety, environmental and social standards including ISO 9001, ISO 14001, ISO 45001, ISO 27001 etc.

TRB INTERNATIONAL CERTIFICATION COMPANY: Within the scope of TÜRKAK and DAKKS accreditation in 11 countries around the world, quality, environment, occupational health and safety, information security, etc. makes independent certification in matters.

MET HSE&WELLBEING CENTER: An audit and training company that develops projects with the universities and the business world with expert teams (lawyers, psychologists, sociologists, health and safety professionals) on labor law, labor legislation, health and safety, sustainability, wellbeing. Integrates international good practices into companies.



CONCLUSION AND ASSESSMENT

With regard to the visit held on 24-25.02.2022, Kazan Soda A.Ş.'s policies on Combating Modern Slavery and Human Trafficking, company practices, field studies and application records were examined. Considering the interviews with managers, employees, interns, subcontractors, reviewed records, feedback, suspicious situation determination studies, and reporting policies, it was determined that there were no officially recorded modern slavery and human trafficking cases in the company. The company has provided all necessary preparations to prevent Modern Slavery and Human Trafficking with its current policies and practices. In order to continuously improve the existing policies and system, the company has included the top management, all employees and the supply chain in the process, and included the targets aimed at preventing modern slavery and human trafficking in the 2022 targets.

This reporting has been prepared at the request of Kazan Soda A.Ş and has been prepared in order to provide an independent assessment of the current situation practices. Reporting covers only Kazan Soda policies, activities and practices and does not cover the Supply Chain.

Based on our company approach, Kazan Soda Elektrik Üretim A.Ş. meets the above requirements, the records provided to us during our field visits, documentation applications and mutual meetings are accurate, reliable data and information.

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Annex 1- Evaluation and Investigation Report on Prevention of Modern Slavery and Human Trafficking (GAP Analysis Report)

