ANBI BELEIDSPLAN / POLICY PLAN

Coders Beyond Borders

Stichting Coders Beyond Borders | 2026 to 2028

Policy period	1 January 2026 to 31 December 2028
Version	3.1. Aligned with the articles of association as amended on 26 October 2026 and with the decisions of the Raad van Toezicht of 30 October 2026. Replaces version 3.0.
Registered name	Stichting Coders Beyond Borders
Also operates as	Coders Beyond Borders (article 2.2 of the articles of association)
Registered address	Henriëtte Ronnerplein 11-1, 1073 KS Amsterdam
Statutory seat	Gemeente Amsterdam
Legal form	Stichting
KvK number	92874770
RSIN	866201348
BTW number	NL823807071B01
Financial year	Calendar year
Governance model	Directeur-bestuurder with a Raad van Toezicht
Website	www.codersbeyondborders.org
Contact	info@codersbeyondborders.org
ANBI status	To be submitted to the Belastingdienst after adoption of this plan
Adopted	30.10.2026 by the directeur-bestuurder, approved by the Raad van Toezicht on 30.10.2026

1. Introduction

Stichting Coders Beyond Borders is a non-profit foundation with its seat in Amsterdam. Until 26 October 2026 it was named Stichting European Newcomers Tech. It also operates under the name Coders Beyond Borders.

Coders Beyond Borders builds responsible technology with and for underserved communities. It brings together people from technology, law and civil society to work on problems that existing systems have not solved. The foundation is newcomer-led. Its current focus is the inclusion of newcomers in the Netherlands, through privacy-first tools and community programmes.

The foundation works on legal empowerment, community participation, employment inclusion, women's empowerment, policy research and responsible technology.

This policy plan covers 2026 to 2028. It sets out what the foundation does, how it is governed, how it manages its funds, and how it meets the conditions for recognition as an Algemeen Nut Beogende Instelling (ANBI). Article references are to the articles of association as amended by notarial deed on 26 October 2026. The application for ANBI status is in preparation.

> **The ANBI conditions this plan addresses**
>
> An institution must devote at least 90 percent of its activities to the general benefit. It may not have a profit motive. Its costs must stay in reasonable proportion to what it spends on its objective. No natural or legal person may dispose of the foundation's assets as if they were their own, and no board member may hold a casting vote or a veto. The institution must keep a current policy plan, keep proper records, have a liquidation clause directing any surplus to a similar public benefit institution, meet the integrity requirement, and publish a fixed set of information on its website.

2. Mission

Coders Beyond Borders builds responsible technology with and for underserved communities, and creates skilled employment in the process.

Three principles shape the work:

- Technology that is secure, open and built in the public interest.
- Programmes that are community-led and shaped by lived experience.
- A long-term commitment to solutions that can be scaled and transferred.

The current focus is migrant inclusion in the Netherlands. Over time the foundation goes where the need takes it, within the limits set in section 4.

3. Vision

A future in which technology and community work side by side on the problems that policy has not managed to fix alone. The foundation builds in the public interest, for the people the system was not designed for.

4. Target groups

In line with the objects in article 3.1 of the articles, the foundation works with newcomers and other underrepresented communities. Its primary target groups are:

- Refugees
- Asylum seekers
- Highly skilled newcomers facing underemployment
- Newcomer women
- Other underrepresented communities facing structural barriers

The present focus is newcomers in the Netherlands. The foundation may later extend its work to other underrepresented communities, for example in healthcare access, education access, civic participation and digital rights. Any extension must stay inside the objects in article 3.1 and must keep the foundation almost entirely directed at the general benefit.

5. Public benefit purpose

The foundation serves the general benefit by working on social exclusion, legal uncertainty, unequal access to information, digital inequality, economic exclusion and barriers to participation. Its activities fall in the fields named in article 3.3: education, welfare, science and scientific research, and the promotion of the rule of law, including access to justice. All of them fall under the headings below, each linked to an object in article 3.1. None of them serves a private interest.

Legal empowerment (article 3.1 b)

Helping refugees, asylum seekers and migrants understand their rights, obligations, procedures and the support available to them.

Community building (article 3.1 c)

Creating community-based support structures that reduce isolation and connect newcomers to trusted networks.

Employment support and economic participation (article 3.1 a and d)

Supporting newcomers through mentorship, training, networking, internships, job readiness and partnerships with employers.

Women's empowerment (article 3.1 c and d)

Supporting migrant and refugee women through literacy, rights awareness, leadership development, mentoring and community participation.

Policy advocacy and research (article 3.1 e)

Producing research and public interest knowledge on migration, technology, employment, inclusion and responsible AI.

Responsible technology for social good (article 3.1 a and f)

Designing tools that improve access to justice, information, education and public services.

The 90 percent test. Every activity listed above is directed at the general benefit, as article 3.4 requires: the foundation serves exclusively or almost exclusively the general interest and has no profit motive. Technical services to other organisations (article 3.2 g) are a means to achieve the objects, not an object in their own right. They are priced on a cost-covering basis, and any positive result is used for the public benefit purpose within a reasonable period. The foundation therefore meets the condition that at least 90 percent of its activities serve the general benefit. Cost proportionality is dealt with separately in section 16.

6. Geographic scope

Article 3.3 allows the foundation to work both in the Netherlands and internationally. It works primarily in the Netherlands. It also works across Europe through EU-funded projects, research consortia and partnerships with civil society organisations. Partner conversations are open in several European countries, at varying stages.

Any activity outside the Netherlands must serve the same public benefit purpose and must stay connected to the needs of newcomers and other underrepresented communities. The skills programmes under article 3.1(a) are directed at newcomers in Europe. The planned expansion sequence is the Netherlands first, then Belgium, Germany, France and the United Kingdom.

7. Core programmes

7.1 Factstream AI

Factstream AI is the foundation's legal information platform. It makes legal, civic and administrative information easier to find and understand for refugees, asylum seekers, migrants and newcomer women.

The platform is built to be GDPR compliant and to meet the requirements of the EU AI Act. Its architecture is designed to be hallucination-safe: every answer cites its source, and the platform escalates to a legal professional where a question needs one. It does not give legal advice and does not replace a lawyer.

The platform covers:

- Plain-language explanation of complex legal and civic information
- Access in the languages the target groups actually use
- Rights and obligations awareness
- Reliable public service information
- Referral to trusted organisations, lawyers and legal clinics
- Community event and integration information

Factstream AI stays inside the stichting for the period of this plan. It must always keep a free access route for refugees, asylum seekers and vulnerable users. Section 27 sets the conditions that would apply to any future structural change.

7.2 WorkBridge

WorkBridge is the employment inclusion programme. It works with newcomers, refugees, asylum seekers and migrants on:

- Career readiness and application support
- Mentorship and mock interviews

- Employer partnerships and professional networking
- Internship routes and training
- Research on occupational downgrading and labour market exclusion

WorkBridge is not funded at present. A new round of work is planned for 2027, subject to funding. Results to date and targets are set out in section 24.

7.3 Project WISE

Project WISE, Women Inclusion through Solidarity and Empowerment, is the women's empowerment and civic participation programme. It works with migrant, refugee and asylum seeker women on:

- Rights literacy, financial literacy and digital literacy
- Leadership development and peer mentoring
- Community participation and safe referral routes
- Paid peer leadership roles for highly skilled refugee women

Project WISE is in its validation phase and is not funded at present. Its first 12-month cycle is planned for 2027, subject to funding. In that cycle five paid peer leaders bring 60 women together in weekly groups, and the programme aims to reach 150 women in total. Section 24 sets out the targets.

7.4 Policy advocacy and research

The foundation carries out research and advocacy on migration and inclusion, access to justice, responsible AI, occupational downgrading, refugee-led innovation, digital rights and inclusive labour markets. The purpose is to improve systems, inform public debate, support evidence-based policy and strengthen the voice of the communities affected.

8. Activities during the policy period

2026: governance, compliance and first delivery at scale

- Amending the articles and moving to a directeur-bestuurder with a Raad van Toezicht: completed by notarial deed on 26 October 2026
- Holding the first meeting of the Raad van Toezicht and setting the approval thresholds: completed on 30 October 2026
- Changing the name to Stichting Coders Beyond Borders, completed by the deed, and updating the bank, the EU Participant Register and other registrations with the new name
- Submitting the ANBI application and publishing the required information on the website
- Taking Factstream AI through its soft launch with 150 newcomers to a public launch at the end of 2026, and preparing the first partner deployments for 2027
- Completing the validation phase of Project WISE and seeking funding for its first cycle in 2027
- Seeking funding for a new round of WorkBridge in 2027
- Dutch and European grant applications
- Putting monitoring and impact measurement on a fixed basis
- Restoring positive equity, which was negative at the end of 2025

2027 to 2028: institutionalisation

- Municipal contracts and EU grants, including AMIF, Erasmus+ and Horizon Europe
- New rounds of WorkBridge and Project WISE, subject to funding
- Institutional partnerships with universities, NGOs and funders
- A stronger monitoring and evaluation system
- Sustainable staffing and responsible technology governance
- Expansion of Factstream AI into neighbouring countries
- A crowdfunding campaign, which depends on ANBI status

2029 and beyond

- Public procurement opportunities
- Cross-border legal information infrastructure in Europe
- Long-term public benefit technology infrastructure for underserved communities

9. Governance structure

The foundation was established on 2 February 2024 by notarial deed before mr. Wieger ten Hove, civil-law notary in Amsterdam, under the name Stichting European Newcomers Tech and with a two-member bestuur. On 26 October 2026 the articles of association were amended in full by notarial deed executed before mr. Frederike van Harskamp, candidate civil-law notary, as substitute for mr. Saskia Laseur-Eelman, civil-law notary in Amsterdam (Van Doorne N.V.). The amendment changed the name to Stichting Coders Beyond Borders and moved the foundation to a bestuur of one directeur-bestuurder, supervised by a Raad van Toezicht.

Ertuğrul Aktan co-founded the foundation and served as the second board member. He resigned with effect from 18 September 2026 and has been removed from the Handelsregister and the UBO register. He no longer has access to the foundation's bank account.

9.1 Who holds which position

Body	Person	Position	Appointed
Bestuur	Omer Yetimoğlu	Directeur-bestuurder, sole statutory director	2 February 2024; directeur-bestuurder since 26 October 2026
Raad van Toezicht	Saskia van den Dool-Gietman	Chair	26 October 2026
Raad van Toezicht	Lennart Baijer	Member	26 October 2026
Raad van Toezicht	Ahmad Atamli	Member	26 October 2026

Members of the Raad van Toezicht are appointed for a term of no more than four years and may be reappointed once, for no more than four years (article 10.6). They retire according to a retirement rota drawn up by the Raad van Toezicht, so that not all members retire at the same time. The first terms, each counted from 26 October 2026, are: Saskia van den Dool-Gietman four years, Lennart Baijer two years and Ahmad Atamli two years. The

Raad van Toezicht has at least three members (article 10.1), appoints its own chair (article 10.5) and fills vacancies itself, using a recruitment procedure and a role profile it adopts (articles 10.2 and 10.4). Membership is incompatible with being a director or employee of the foundation, with paid work for the foundation, and with close family ties to a director (articles 4.2 and 10.3).

9.2 What the Raad van Toezicht decides

The directeur-bestuurder manages the foundation under the supervision of the Raad van Toezicht and holds all powers that the law or the articles do not give to another body (articles 7.1 and 7.2). As sole director he represents the foundation alone (article 9.2). The Raad van Toezicht supervises and advises (article 12.1). It takes some decisions itself, and its prior approval is required for others.

Decided by the Raad van Toezicht itself:

- The appointment, suspension and dismissal of the directeur-bestuurder (articles 5.2 and 6.1)
- The salary and other terms of employment of the directeur-bestuurder (article 5.4)
- The annual appraisal of the directeur-bestuurder (article 5.6)
- The appointment, suspension and dismissal of its own members, and the choice of its chair (articles 10.2, 10.5 and 11.1)
- The appointment of the accountant (article 12.3)
- Board decisions on which the directeur-bestuurder has a conflict of interest (article 8.2)

Board decisions that need the prior approval of the Raad van Toezicht (article 12.4):

- The policy plan, including the theory of change, and any amendment to it (a)
- The budget (b)
- The management report and the financial statements, together the annual report (c)
- Amending the articles, a legal merger or demerger, and dissolution of the foundation, including the destination of any surplus (d, e, f)
- Applying for bankruptcy or suspension of payments (g)
- Agreements, including loans, above an amount set by the Raad van Toezicht (h)
- Setting up, taking an interest in or taking part in other legal entities, partnerships or joint ventures, and ending them (i)
- Transferring or encumbering intellectual property above a threshold, and licensing it other than in the ordinary pursuit of the objects (j)
- Paid service or commercial agreements above a threshold (k)
- Accepting a grant, gift or other funding above a threshold, or with conditions that materially affect the activities or the objects. Submitting an application needs no approval (l)
- Adopting or materially changing the investment and treasury policy (m)
- Adopting or changing the board regulations (n)
- Commitments and spending not provided for in the approved budget, above an amount set by the Raad van Toezicht (o)
- Disposing of or encumbering assets, or making them available free of charge or below market value, above an amount set by the Raad van Toezicht, other than in the ordinary pursuit of the objects (p)

Decisions that fit within the approved policy plan and budget are deemed approved, and the Raad van Toezicht is informed at its next meeting. This does not apply to items a to g and m to p (article 12.5). Acquiring or

encumbering registered property, guarantees and joint and several liability always need prior approval, and without it the foundation is not validly represented (article 7.4). The Raad van Toezicht set the thresholds by resolution on 30 October 2026:

Item (article 12.4)	Prior approval needed
Agreements, including loans (h)	Any agreement not provided for in the approved budget or policy plan, whatever its amount, including agreements without monetary value. Every loan, taken or given, regardless of amount. Approval may be discussed and decided by email between meetings. The Raad van Toezicht reviews this rule after the first year.
Intellectual property (j)	Any transfer or encumbrance, and any exclusive licence, regardless of value. Non-exclusive licences in the ordinary pursuit of the objects need no approval.
Paid service or commercial agreements (k)	Above EUR 50,000 per agreement, where not provided for in the approved budget or policy plan.
Grants, gifts and other funding (l)	No approval as a rule. Approval is needed where the conditions materially affect the activities or the objects, or where acceptance carries a reputational risk because of the political profile of the funder or the source of its wealth. Applications need no approval.
Commitments and spending outside the budget (o)	Above EUR 50,000 per item. An agreement outside the budget always needs approval under item h, whatever its amount.
Disposal or encumbrance of assets (p)	Any disposal or encumbrance, and any use free of charge or below market value, other than in the ordinary pursuit of the objects.

In addition, under this plan the Raad van Toezicht approves the Recruitment and Remuneration Policy for staff and contractors (section 11) and any engagement with a related party (section 12).

9.3 Control over the foundation's assets

The ANBI conditions require that no natural or legal person can dispose of the foundation's assets as if they were their own. Article 3.5 of the articles states this. With a single statutory director it needs to be visible, not assumed. The following applies:

- The directeur-bestuurder cannot adopt the policy plan, the budget or the annual report without the prior approval of the Raad van Toezicht (article 12.4 a to c).
- The Raad van Toezicht sets the salary of the directeur-bestuurder. He does not set it and does not vote on it (article 5.4).
- No director and no member of the Raad van Toezicht has a casting vote. A tied vote means the proposal is rejected (articles 8.5 and 13.4).
- The Raad van Toezicht decides by majority, and the directeur-bestuurder is not a member of it (articles 10.3 and 13.4). Amending the articles, a merger and dissolution need the approval of at least three quarters of the votes, in a meeting where all members are present (articles 17.2 and 18.1).
- The directeur-bestuurder cannot appoint, suspend or dismiss members of the Raad van Toezicht (articles 10.2 and 11.1).
- Disposing of assets above a threshold, or making them available below market value, needs prior approval (article 12.4 p). Property, guarantees and joint and several liability always do (article 7.4).
- Where the directeur-bestuurder has a conflict of interest, the Raad van Toezicht takes the decision (article 8.2).

- Payments above EUR 50,000 need the prior approval of the chair of the Raad van Toezicht or a member it designates, enforced through dual authorisation at the bank (article 12.6).
- Any remaining assets on dissolution go to a similar public benefit institution (article 18.5 and section 23).

9.4 Record keeping

Decisions of the Raad van Toezicht are minuted (article 13.9). Because the bestuur has one member, every decision of the directeur-bestuurder is taken in writing, with its reasons, and recorded in a resolutions register that is shared with the Raad van Toezicht at least once per quarter (article 8.1). Decisions that require approval are recorded with the approval attached. Conflicts of interest are recorded under section 12. Financial records are kept for at least seven years (article 16.6).

10. The directeur-bestuurder

Omer Yetimoğlu is the directeur-bestuurder. He founded the foundation and has worked for it without payment since February 2024: more than 3,500 hours to 31 October 2026, all recorded as an in-kind contribution. No payment is sought for any of that work. The role combines the statutory directorship with the executive running of the foundation: programme delivery, fundraising, partnerships, technology direction, compliance and staff management.

Under the founding articles no board member could be paid. Under the amended articles, the salary and other terms of employment of the directeur-bestuurder are set by the Raad van Toezicht and relate to his employment with the foundation. He receives no remuneration in his capacity as director (article 5.4). This became possible once the Raad van Toezicht was established: the bestuur acts under its supervision and needs its prior approval for the policy plan and the budget (articles 7.2 and 12.4), so for ANBI purposes the Raad van Toezicht is the policy-determining body. Until then no remuneration was permissible and none was drawn.

10.1 How the amount is set

- The Raad van Toezicht sets the amount (article 5.4). The directeur-bestuurder does not take part in the decision and does not vote on it.
- The amount is benchmarked against external Dutch non-profit sector data. The primary benchmark is the CAO Sociaal Werk. Goede Doelen Nederland is used where the CAO gives no comparator.
- The amount is set at or below the midpoint of the benchmark range, in line with the adopted Recruitment and Remuneration Policy.
- It pays for the employment in the executive role only. Nothing is paid for the statutory directorship as such (article 5.4).
- Hours, rate, scope and term are recorded in writing.
- The employment contract is signed for the foundation by the chair of the Raad van Toezicht (article 12.11).
- The decision is minuted by the Raad van Toezicht and the amount is disclosed in the annual accounts and on the website.
- No part of it is linked to surplus, turnover or fundraising results.

10.2 The decision

Decided by	Raad van Toezicht
Date of decision	30 October 2026
Benchmark used	CAO Sociaal Werk, scale 12
Benchmark midpoint	EUR 39.79 gross per hour (CAO table to 30 September 2026). About EUR 40.63 from 1 October 2026, after the 2.1 percent increase.
Gross hourly rate set	EUR 39.79, at or below the benchmark midpoint
Contracted hours	As set in the employment contract, within the maximum total cost for the period. Hours worked beyond the contract are donated as an in-kind contribution.
Period covered	1 November 2026 to 30 June 2027
Contract form	Employment contract (article 5.4)
Total cost to the foundation	Not more than EUR 40,000 for the whole period, including holiday pay, year-end payment and employer charges
Recorded in	Minutes of the Raad van Toezicht of 30 October 2026

The directeur-bestuurder was not present for this decision and took no part in it (article 13.10). Nothing is paid for the directorship as such (article 5.4). The remuneration is reviewed together with the annual appraisal (article 5.6), and any extension is decided separately. The amount is disclosed in the annual report and on the website.

11. Remuneration policy

The foundation adopted a Recruitment and Remuneration Policy on 7 September 2026, before the Raad van Toezicht existed. The Raad van Toezicht confirmed it on 30 October 2026, when it approved this plan and set the remuneration of the directeur-bestuurder in line with it. It is published on the foundation's website and it is the governing document on pay. This section states its main lines for the purpose of the ANBI publication obligation. Where the two differ, the Recruitment and Remuneration Policy governs.

Group	Remuneration
Raad van Toezicht	No remuneration for supervisory duties. The articles allow reimbursement of expenses and a non-excessive attendance fee (article 10.7). The Raad van Toezicht decided on 30 October 2026 that no attendance fee is paid. Costs actually incurred are reimbursed against receipts.
Advisory board	No remuneration. Reimbursement of costs actually incurred, against receipts.
Directeur-bestuurder	Paid for the employment in the executive role only, at an amount set by the Raad van Toezicht against an external benchmark. No remuneration for the directorship as such (article 5.4). See section 10.

Group	Remuneration
Staff and contractors	Benchmarked against the CAO Sociaal Werk, and against Goede Doelen Nederland or published Dutch technology market data where the CAO gives no comparator. Set at or below the benchmark midpoint, never below 80 percent of the midpoint, and never below the statutory minimum hourly wage.
Volunteers	Unpaid. The foundation does not use the Dutch untaxed volunteer allowance scheme at all. Costs actually incurred may be reimbursed against receipts.

Nobody receives a dividend, a profit share or any private distribution from the foundation. No payment is linked to surplus or to fundraising results.

12. Conflict of interest and related parties

A conflict of interest arises where the directeur-bestuurder, a member of the Raad van Toezicht, an employee, a contractor or a volunteer has a personal, financial or professional interest in a decision of the foundation.

Where that happens:

1. The person discloses the conflict immediately, in writing.
2. The disclosure and the decision are recorded in the minutes.
3. The person does not take part in the discussion or the decision.
4. The decision is taken by those who are not conflicted. Where the directeur-bestuurder is conflicted, the Raad van Toezicht takes the decision, records it in writing with its reasons and reports it in the annual report (article 8.2). Where all members of the Raad van Toezicht are conflicted, it decides unanimously and records its reasons (article 13.7).
5. The decision must be demonstrably in the interest of the foundation.
6. Any agreement with a related party must be at arm's length, in writing, and approved in advance by the Raad van Toezicht.

Related parties. For the purpose of this plan a related party of the directeur-bestuurder means a family member, a member of the same household, a romantic partner, and any person or entity with whom the directeur-bestuurder shares a financial interest. The directeur-bestuurder holds interests in Benelux AI and Pontevia, and both fall inside this definition. Working closely with volunteers is the foundation's operating model and is not a conflict.

12.1 Standing disclosures

A member of the Raad van Toezicht who has a relationship with the foundation in another capacity discloses it before appointment, and it is stated in the annual report (article 10.3). On 30 October 2026 the Raad van Toezicht recorded that no member has a relationship with the foundation in another capacity. The standing disclosure of the directeur-bestuurder is recorded below.

Person	Relationship disclosed	Treatment
Omer Yetimoğlu	Directeur-bestuurder. Holds interests in Benelux AI and Pontevia.	Disclosed and recorded. No agreement between the foundation and either company may be entered into without the prior approval of the Raad van Toezicht, which decides in his place (article 8.2). No such agreement exists at the date of this plan.

The register of disclosures is reviewed at least once a year by the Raad van Toezicht.

13. Asset management and reserves

The foundation's assets are used only for its public benefit purpose (article 3.5). It does not hold more assets than it reasonably needs for the continuity of its planned activities (articles 3.6 and 3.7). It holds no investment portfolio and does not intend to build one. Any investment and treasury policy needs the prior approval of the Raad van Toezicht (article 12.4 m).

At 31 December 2025 the foundation's equity was negative, at minus 1,344 euro. That is the result of a start-up period in which the accounting and banking costs were incurred before the grant income arrived, and in which the founder worked unpaid. The first financial priority in this policy period is to restore positive equity.

Once equity is positive the foundation aims to build a continuity reserve of at most six months of committed fixed costs, including staff obligations, technology hosting, compliance and the orderly completion of running projects. The Raad van Toezicht set this ceiling on 30 October 2026. The target level within it is set by the directeur-bestuurder and approved by the Raad van Toezicht as part of the annual budget. Any reserve held is stated and explained in the annual accounts, with the purpose it serves.

Assets may be used for	Assets may not be used for
Project and programme costs	Dividends or any private distribution
Staff and contractor pay	Private enrichment of any person
Technology development, hosting and security	Political party financing
Legal, accounting and compliance costs	Excessive remuneration
Training and community activities	Activities outside the public benefit purpose
Research, monitoring and evaluation	Speculative investment
Outreach, communication and fundraising	Loans to board members, staff or related parties
Governance and safeguarding	

14. Revenue model

The foundation is funded mainly by grants. It expects grants to account for more than 80 percent of income for the first three years of this plan. The revenue engine at present is Dutch grant funding.

Expected revenue streams:

- Grants from Dutch and European foundations
- European Union programme funding
- Donations from individuals and organisations, including crowdfunding once ANBI status is granted
- Government and municipal contracts
- Corporate partnerships and sponsored events
- Technical services to other organisations (article 3.2 g), and educational and advisory services that sit inside the public benefit purpose

The foundation does not distribute profits. Any surplus is used for current and future public benefit work. Services are a means to achieve the objects. Under the ANBI rules, commercial activity is allowed only to finance the public benefit work, with the proceeds applied to it within a reasonable period, and the foundation applies its income on that basis. Paid service or commercial agreements above a threshold set by the Raad van Toezicht need its prior approval (article 12.4 k).

15. Fundraising strategy

The foundation raises funds from Dutch foundations, European Union programmes, municipalities and government bodies, corporate partners, individual donors and institutional funders.

Funding is accepted only where it does not compromise the foundation’s independence, its public benefit purpose, its privacy and responsible technology principles, its non-discrimination commitments or its ANBI compliance. The foundation refuses funding that creates a reputational, ethical, legal or mission risk. A decision to refuse funding is recorded and reported to the Raad van Toezicht. Accepting funding needs no approval as a rule. It needs the prior approval of the Raad van Toezicht where the conditions materially affect the activities or the objects, or where acceptance carries a reputational risk because of the political profile of the funder or the source of its wealth. Submitting an application does not (article 12.4 l).

Fundraising costs are kept in reasonable proportion to the funds raised and are reported separately in the annual accounts.

16. Expenditure policy and cost proportionality

The foundation spends primarily on activities that reach its target groups directly. Expected categories:

- Technology development, hosting, security and maintenance
- Responsible AI design, testing and safety work
- Programme and operational staff
- Community outreach and peer leadership
- Legal information coordination and referral
- Employment support activities
- Women's empowerment programming
- Research and advocacy
- Monitoring and evaluation
- Communications and public reporting
- Accounting, legal support and governance

Reasonable proportion. The ANBI conditions require costs to stay in reasonable proportion to what the foundation spends on its objective. The foundation measures this each year and reports it in the annual accounts, splitting total expenditure into direct public benefit spending, management and administration, and fundraising.

In a start-up year this ratio is not representative. In 2025 total expenditure was 9,710 euro, of which 1,659 euro was accounting and banking cost. Those costs are largely fixed and do not fall when turnover is small, so the administrative share looks high against a small base. The foundation expects the ratio to settle as income grows, and will explain it in the annual accounts rather than present it without context.

The foundation keeps management and administration costs within a working ceiling of 15 percent of annual expenditure from 2026 onward, as set by the Raad van Toezicht on 30 October 2026. Where the ceiling is exceeded, the reason is explained to the Raad van Toezicht and in the annual accounts.

17. Finances

17.1 Results 2024 and 2025

The figures below are taken from the annual accounts prepared by iAuditor Accountants B.V., Almere. The full financial accountability is published separately.

In euro	2024	2025
Contributions from third parties	0	8,250
Donations	50	124
Total income	**50**	**8,374**
Gross wages and social security contributions	0	7,993
Travel and accommodation	0	59
Accounting costs	0	1,392
Total operating expenses	**0**	**9,443**
Financial expenses	58	267
Net result	**-8**	**-1,336**
Equity at year end	**-8**	**-1,344**

The 8,250 euro received in 2025 was the first instalment of a grant from SIDN Fonds. The wage cost relates to the foundation's first paid engagement. The founder drew nothing.

17.2 Income 2026

Source	Status	Amount
SIDN Fonds, second instalment	Received	2,000
Adessium Foundation, first instalment	Received	30,000
Stichting Allemansrecht	Received, single payment	30,000
Individual Donations	Received	184
UvA Law Hub Reward	Received	250
Confirmed income 2026		**62,434**
Adessium Foundation, second instalment	Conditional on ANBI status	20,000
Total including conditional		**82,434**
Applications under assessment	UNHCR Innovation Accelerator, Erasmus, Internal Security Fund, MATRA	**539,000**

An ANBI point worth noting

Income above 50,000 euro in a financial year makes a fundraising ANBI a "grote ANBI". From that year the Belastingdienst standard publication form becomes compulsory instead of optional. On the figures above that threshold is crossed in 2026, so the form applies to the 2026 financial year, to be published before 1 July 2027. Section 19 sets this out.

17.3 Budget 2026

The expenditure budget below was set by the directeur-bestuurder and approved by the Raad van Toezicht on 30 October 2026 (article 12.4 b).

Category	Amount	Share
Factstream AI development and content (in-house)	EUR 17,780	46%
Programme staff and contractors	EUR 9,025	23%
Technology, hosting, security and compliance	EUR 2,405	7%
Travel subsistence	EUR 2,000	5%
Accounting, legal and governance	EUR 7,200	19%
Total	EUR 38,410	**100%**

17.4 Outlook 2027 and 2028

The foundation is working toward an annual budget of at least 300,000 euro for 2027, funded mainly by grants and by a first tranche of municipal and EU funding. Figures for 2027 and 2028 are set in the annual budget cycle and approved by the Raad van Toezicht. They are not fixed here, because doing so would state as planned what is still an application pipeline.

18. Financial administration

The foundation keeps a bookkeeping and accounting system. Annual accounts for 2024 and 2025 were prepared by iAuditor Accountants B.V., Almere. The foundation uses ING Zakelijk as its business account.

The administration shows income received, grants and donations, project-restricted funds, expenditure, management and administration costs, fundraising costs, reimbursements, payments to staff and contractors, assets and liabilities, reserves, project budgets and the annual accounts.

The bestuur draws up the financial statements and a management report, which together form the annual report, and adopts it within six months of the end of the financial year after approval by the Raad van Toezicht. All directors and all members of the Raad van Toezicht sign the financial statements (articles 16.3 and 16.5). The records show the expense reimbursements and attendance fees of the Raad van Toezicht, the remuneration of the directeur-bestuurder, the administration costs, and the income and assets (article 16.2). They are kept for at least seven years (article 16.6). The Raad van Toezicht appoints the accountant (article 16.4). For 2026 no auditor is appointed: the financial statements are compiled by the bookkeeper, as for 2024 and 2025. An audit is not legally required for a foundation of this size. The Raad van Toezicht reviews this each year, or sooner if a funder or the law requires an audit.

19. Publication obligation

The foundation publishes the required information on www.codersbeyondborders.org, on a page that is publicly accessible without login. The page address is given to the Belastingdienst so that it can be linked from the ANBI register.

Required item	How the foundation meets it
Name	Stichting Coders Beyond Borders, which also operates as Coders Beyond Borders
RSIN or tax number	866201348
Contact details	Postal address, email address and website
Objective	The objects in article 3.1 of the articles, reproduced in full. The consolidated text of the articles of 26 October 2026 is published as well.
Main lines of the policy plan	A public summary of this plan, with the full plan available as a download
Composition of the board	The bestuur and the Raad van Toezicht, with names and positions
Remuneration policy	For the statutory board and the policy-determining body, and for staff and the executive role. The adopted Recruitment and Remuneration Policy is published in full.
Current report of activities	An annual activity report, published and updated each year
Financial accountability	A balance sheet and a statement of income and expenditure, with notes

19.1 Deadlines

- The financial information is published within six months of the end of the financial year. With a calendar financial year that means before 1 July.
- The activity report is published at least once a year and covers what the foundation actually did, not only what it achieved.
- The remaining items are kept current as they change, in particular the composition of the bestuur and the Raad van Toezicht.

19.2 The standard form

An ANBI that actively raises funds from third parties and has total income above 50,000 euro in a financial year is a "grote ANBI" and must use the Belastingdienst standard publication form. On the 2026 income in section 17.2 the foundation crosses that threshold in 2026. It will therefore publish the 2026 financial year using the standard form for fundraising institutions, before 1 July 2027.

For 2024 and 2025 the foundation was below the threshold, so it publishes those years in its own format.

19.3 The coming Belastingdienst portal

The Fiscale verzamelwet 2026 creates the legal basis for a central digital portal through which ANBIs will file their publication data electronically on a standard form, and for a second portal for supervision. The commencement date is set by ministerial regulation. The foundation monitors this and will move its publication to the portal when it applies.

20. Integrity

The foundation and the people who determine its policy must meet the integrity condition that applies to ANBIs. The articles make this a requirement for every director and every member of the Raad van Toezicht (articles 5.1 and 10.1). The foundation does not appoint or retain a director, a member of the Raad van Toezicht or a person who determines its public face where that condition is not met.

Before appointment, each member of the Raad van Toezicht confirms in writing that no relevant criminal conviction applies to them within the period the Belastingdienst specifies, and that they are not disqualified from holding office. The confirmations are kept on file. The same applies to the directeur-bestuurder. The foundation does not request certificates of good conduct (VOG) as a standard step. It provides them if the Belastingdienst asks for them.

21. Data, privacy and technology

The foundation builds privacy-first technology. It works to the GDPR and designs its tools to meet the requirements of the EU AI Act. It processes only the personal data a service actually needs, and it does not process special category data where this can be avoided. Where processing is necessary, the foundation applies data protection by design and keeps a record of processing activities.

For AI-based tools the foundation applies the following principles:

- Human-centred design and transparency about what the tool is and is not
- Privacy by design and data minimisation
- Answers that cite their sources, so a user can check them
- Clear communication with users, and testing with the communities the tool serves
- No substitute for professional legal advice
- Escalation to a qualified legal professional, a legal clinic or a partner organisation where a question needs one
- Risk-based safeguards, reviewed as the tool changes

22. Risk management

Risk	How it is managed
Negative equity carried from the start-up period	Restoring positive equity is the first financial priority of 2026. Progress is reported to the Raad van Toezicht each quarter.
Dependence on grants	Diversification across Dutch foundations, EU programmes, municipal contracts and donations. Grants are expected to stay above 80 percent for the first three years, and the plan states that openly rather than assuming otherwise.
Funding delays and instalment timing	Cash flow is planned against instalment dates. Commitments are not entered into ahead of confirmed income.
Concentration of authority in one director	A Raad van Toezicht that appoints, appraises and can dismiss the directeur-bestuurder, sets his pay, and approves the plan, the budget, the annual report and major commitments (articles 5, 6 and 12.4). Decisions of the directeur-bestuurder are recorded in a register that is shared every quarter (article 8.1).
Conflict of interest	Standing disclosures in section 12, advance approval of related-party engagements, and an annual review of the register.
Reclassification of contractors as employees	A written test before any freelance agreement, set out in the internal Hiring Procedure and Controls. Employment is the default form.
Changes in Dutch flexible work law	The Wet meer zekerheid flexwerkers is monitored for its effect on contractor arrangements.
Technology and AI compliance	GDPR and EU AI Act requirements built into the design of Factstream AI, with sourcing and escalation as standing controls.
Delivery delays in technology development	A phased pilot approach, with partner deployment rather than a single launch.
Reputational risk	Transparent communication, documented governance and published reporting.
Compliance burden on a small team	Pro bono legal support, an external accountant, and a fixed annual compliance calendar.

23. Liquidation and remaining assets

If the foundation is dissolved, any assets remaining after settlement of its debts are transferred to an Algemeen Nut Beogende Instelling with a similar objective, designated by the bestuur with the approval of the Raad van Toezicht, or to a foreign institution that serves the general benefit exclusively or almost exclusively and whose objective is as similar as possible. This is recorded in article 18.5 of the articles. A resolution to dissolve needs the prior approval of the Raad van Toezicht by at least three quarters of the votes, with all members present (articles 12.4 f and 18.1).

The articles, including this clause, were reviewed against the ANBI requirements by Van Doorne as part of the amendment of 26 October 2026.

24. Monitoring and impact measurement

The foundation measures what it does and reports it in the annual activity report. Indicators per programme:

Factstream AI

- Users served and questions answered
- Referrals made to legal professionals and partner organisations
- Escalation rate and response quality
- Languages served and user satisfaction
- Partner organisations deploying the platform

Project WISE

- Women reached and literacy outcomes
- Peer leaders trained and paid peer leadership roles created
- Community events held and participation levels

WorkBridge

- Participants coached, mentorship matches and mock interviews
- Internships and jobs entered
- Training completion and employer partnerships established

Research and advocacy

- Publications, policy consultations and stakeholder engagement
- Academic partnerships and public events

Baseline and targets. The baseline counts what the foundation has delivered since its incorporation in February 2024. WorkBridge and Project WISE are not funded at present. Their targets apply once funding is confirmed, and the Raad van Toezicht adjusts them if funding is lower than planned. Targets for Project WISE are set per 12-month cycle, starting when funding is confirmed. The Raad van Toezicht approved these figures on 30 October 2026 and reviews them each year.

Factstream AI: baseline and targets

Indicator	To date (Oct 2026)	2027 target	2028 target
Newcomers using the platform	In testing	1,000	3,000
Questions answered	In testing	4,000	12,000
Questions escalated to legal experts	In testing	40	120
Partner organisations deploying the platform (cumulative)	0	2	4
Response quality	Measured during soft launch	Threshold set from open benchmark	Maintained or improved

Questions answered assume about four questions per user, revised after the soft launch. The 2028 targets depend on funding beyond June 2027.

WorkBridge: baseline and targets

Indicator	To date	2027 target	2028 target
Employer workshops and career events	4	5	6
Participants in workshops and events	80	150	200
Certification programme participants	10	30	50
Mentorship matches	20	30	35
Internships and jobs entered	Not started yet	8	15
Employer partners active	Not started yet	4	6

Targets apply once funding for the new round is confirmed.

Project WISE: baseline and targets

Indicator	To date	Cycle 1 (2027)	Cycle 2 (2028)
Paid peer leaders employed	Not started yet	5	10
Women in weekly groups	Not started yet	60	150
Women reached in total, including events	30	150	250
Organisations and institutions connected to participants	5	10	15
Participants reporting stronger bonds, bridges or links	Not yet measured	60%	65%
Women in the volunteer network after the cycle	0	20	30

Bonds, bridges and links follow the Ager and Strang integration framework, measured with a short survey at the start and end of each cycle. Targets apply once funding is confirmed.

Research and advocacy: baseline and targets

Indicator	To date	2027 target	2028 target
Research outputs published	1	2	2
Public events and presentations	4	6	6
Policy consultations	Not started yet	2	3
Academic partnerships formalised in writing	Not started yet	3	3

Ongoing research: Factstream AI with Stichting IPN, and Project WISE with Forced 2 Flee Foundation. Published to date: research on occupational downgrading among high-skilled newcomers (2025). The 2027 outputs are expected to come from the two ongoing studies.

25. Partnerships

The foundation works with universities, NGOs, public institutions, legal support organisations, refugee-led networks, municipalities, companies and funders.

Partners and networks the foundation has worked with or is building relationships with include the UvA Law Hub, Stichting Rechtswinkel Migranten, Global Mentorship Initiative, Tilburg University, SIDN Fonds, Adessium Foundation, Stichting Allemansrecht, Stichting We'rhere, UNHCR Netherlands, Social Impact Makers, the Gemeente Amsterdam impact ecosystem, the Refugee Led Organisation Network, VluchtelingenWerk Nederland, Tech to the Rescue and Visit.org.

Partner conversations on Factstream AI deployment are open in the Netherlands and in several other European countries. These are conversations at varying stages, not confirmed commitments, and the foundation describes them as such in its reporting.

Every partnership must support the public benefit purpose. No partnership may create a private benefit that is inconsistent with the ANBI conditions.

26. Public communication and transparency

The foundation communicates openly about its purpose, programmes, governance, funding, remuneration policy, activities, results and finances. It publishes an annual activity report and an annual financial accountability on its website.

The foundation reports honestly about what has and has not worked. Pilot results are described as pilot results. Partner conversations are described as conversations. Figures are attributed to the period in which they were achieved.

27. Future structure and mission lock

The foundation may in future examine a separate legal vehicle for Factstream AI, alongside the stichting. Mozilla and Wikimedia are the structural precedents being looked at. Nothing of this kind is planned within this policy period.

Any such structure would have to meet all of the following:

- The public benefit purpose stays protected and controlling.
- No asset of the foundation is transferred for private enrichment.
- Any subsidiary or social enterprise serves the foundation's purpose. Setting one up or taking part in one needs the prior approval of the Raad van Toezicht (article 12.4 i).
- Control rights protect the mission, not private profit.
- Refugees, asylum seekers and vulnerable users keep a free access route.
- The foundation stays compliant with the ANBI conditions.
- The Raad van Toezicht approves the transaction, with any conflicted person excluded (articles 8.2 and 12.4 i, j and p).
- Independent legal and tax advice is obtained beforehand.
- Any net income returning to the foundation is used only for public benefit work.

28. ANBI compliance statement

Stichting Coders Beyond Borders commits to the following:

- The foundation is directed almost entirely at the general benefit.
- At least 90 percent of its activities serve the general benefit.
- It has no profit motive and distributes no profit.
- Any surplus is used for the foundation's purpose.
- No natural or legal person can dispose of the foundation's assets as if they were their own.
- No director and no member of the Raad van Toezicht has a casting vote, and the directeur-bestuurder cannot decide alone on the main decisions about the foundation’s assets.
- Members of the Raad van Toezicht are not paid for supervisory duties and may claim only costs actually incurred.
- The directeur-bestuurder is paid for the executive role only, at an amount set by the Raad van Toezicht against an external benchmark, and takes no part in that decision.
- The foundation keeps proper records and prepares annual accounts.
- Costs stay in reasonable proportion to spending on the objective.
- The foundation holds no more assets than it reasonably needs.
- The required information is published on the website and kept current.
- The people who determine policy meet the integrity condition.
- On dissolution, remaining assets go to a similar public benefit institution.

29. Adoption

This policy plan was adopted by the directeur-bestuurder of Stichting Coders Beyond Borders after the prior approval of the Raad van Toezicht (article 12.4 a).

Adopted on	30 October 2026
Approved by the Raad van Toezicht on	30 October 2026
Place	Amsterdam, the Netherlands
Next review	Annually, and immediately on any change to the statuten or the governance structure