ANBI BELEIDSPLAN / POLICY PLAN

Coders Beyond Borders

Stichting Coders Beyond Borders | 2026 to 2028

Registered name	Stichting Coders Beyond Borders
Also operates as	Coders Beyond Borders
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KvK number	92874770
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Policy period	1 January 2026 to 31 December 2028
Version	3.2, replaces version 3.1

1. About the foundation

Stichting Coders Beyond Borders is a non-profit foundation based in Amsterdam. It was founded on 2 February 2024 as Stichting European Newcomers Tech and took its current name on 26 October 2026. The foundation is newcomer-led.

This plan sets out what the foundation wants to achieve, what it does to get there, how it raises income, and how it manages and spends its assets. It covers 2026 to 2028, with a separate overview of plans for 2027 in section 4.6. Article references are to the articles of association as amended on 26 October 2026.

2. Objective

The foundation builds responsible technology and community programmes with and for newcomers and other underrepresented communities. Its aim is that they understand their rights, can find reliable information, take part in society and find work that fits their skills.

Its objects are set out in article 3.1 of the articles. In short, the foundation works on:

- Legal empowerment: helping newcomers understand their rights, obligations and procedures.
- Employment inclusion: training, mentoring and links with employers.
- Community and women’s empowerment: peer support, leadership and participation.
- Research and advocacy on migration, inclusion and responsible technology.
- Responsible technology that improves access to justice, information and public services.

These activities fall within education, welfare, scientific research and the rule of law, including access to justice (article 3.3). The foundation serves the general interest exclusively or almost exclusively and has no profit motive (article 3.4). At least 90 percent of its activities serve the general benefit.

3. Target group

The foundation works with newcomers in the Netherlands. By newcomers we mean refugees, asylum seekers and other migrants who are building a life here. Within this group it focuses on:

- People who need clear legal and practical information about their situation.
- Highly skilled newcomers who work below their level or cannot find work.
- Newcomer women who face extra barriers to participation.

The foundation may later work with other underrepresented communities facing structural barriers, as long as this stays within the objects in article 3.1.

4. Activities

4.1 Factstream AI

Factstream AI is a multilingual legal information platform. It explains legal, civic and administrative information in plain language and in the languages newcomers use. Every answer cites its source. Where a question needs a lawyer, the platform refers the user to a legal professional or partner organisation. It does not give legal advice. The platform is built to meet the GDPR and the EU AI Act, and it always keeps a free access route for vulnerable users.

4.2 WorkBridge

WorkBridge helps newcomers into work that matches their skills. It offers career readiness support, mentoring, mock interviews, training and links with employers. It also supports research on why skilled newcomers end up in work below their level.

4.3 Project WISE

Project WISE (Women Inclusion through Solidarity and Empowerment) works with newcomer women on rights, financial and digital literacy, leadership and community participation. Paid peer leaders, themselves highly skilled newcomer women, lead weekly groups.

4.4 Research and advocacy

The foundation carries out research on migration, access to justice, employment and responsible AI, together with universities and research partners. It shares the results to inform public debate and policy.

4.5 Where we work

The foundation works mainly in the Netherlands. It also takes part in European projects and partnerships where these serve the same objective (article 3.3).

4.6 Plans for 2027

- Rolling out Factstream AI after its public launch, with the first deployments by partner organisations.
- Running a new round of WorkBridge, subject to funding.
- Running the first 12-month cycle of Project WISE, subject to funding.
- Completing the two ongoing research projects and publishing the results.
- Applying for Dutch and European funding, and starting individual giving once ANBI status is granted.
- Strengthening monitoring, so results are reported each year in the activity report.

For 2028 the foundation plans to continue these programmes and to bring Factstream AI to partners in neighbouring countries.

5. How the foundation raises income

The foundation is funded mainly by grants. It expects grants to make up most of its income during this plan period. Its sources are:

- Grants from Dutch and European foundations.
- European Union programme funding.
- Contracts with municipalities and other public bodies.
- Donations from individuals and organisations, including crowdfunding once ANBI status is granted.
- Corporate partnerships and sponsored events.
- Technical, educational and advisory services to other organisations (article 3.2 g).

Services are a means to reach the objective, not a goal in themselves. They are priced to cover costs, and any surplus is used for the foundation's public benefit work. The foundation only accepts funding that does not affect its independence or its objective.

6. How the foundation manages its assets

The foundation's assets are used only for its objective (article 3.5). Funds are held in a business bank account in the name of the foundation. The foundation does not invest and does not hold an investment portfolio. Any change to this needs the prior approval of the Raad van Toezicht (article 12.4 m).

Payments above EUR 50,000 need the approval of the chair of the Raad van Toezicht or a member it designates (article 12.6). The foundation keeps proper financial records for at least seven years and prepares annual accounts.

7. How the foundation spends its assets

The foundation spends its funds on activities that reach its target group directly. The main categories are:

- Programme delivery, including staff, contractors and peer leaders.
- Technology development, hosting, security and AI safety work.
- Community outreach, training and events.
- Research, monitoring and evaluation.
- Fundraising, communication and public reporting.
- Accounting, legal support and governance.

Reasonable costs. Management and administration costs are kept within 15 percent of annual spending, a ceiling set by the Raad van Toezicht. If this is exceeded, the reason is explained in the annual accounts.

Reserves. The foundation holds no reserves at present. Over time it may build a continuity reserve of at most six months of fixed costs, so that staff, hosting and running projects can be completed in an orderly way. The Raad van Toezicht set this ceiling. Any reserve is explained in the annual accounts. The foundation does not hold more assets than it reasonably needs for its work (articles 3.6 and 3.7).

8. Board and governance

The foundation has a directeur-bestuurder who manages it, supervised by a Raad van Toezicht.

Body	Name	Position
Bestuur	Omer Yetimoğlu	Directeur-bestuurder
Raad van Toezicht	Saskia van den Dool-Gietman	Chair
Raad van Toezicht	Lennart Baijer	Member
Raad van Toezicht	Ahmad Atamli	Member

No one can use the foundation's assets as if they were their own. In particular:

- The policy plan, the budget and the annual report need the prior approval of the Raad van Toezicht (article 12.4).
- The Raad van Toezicht appoints, appraises and can dismiss the directeur-bestuurder, and sets his pay (articles 5 and 6).
- No one has a casting vote. A tied vote means a proposal is rejected (articles 8.5 and 13.4).
- Major commitments and disposals of assets outside the budget need prior approval (article 12.4).
- Where the directeur-bestuurder has a conflict of interest, the Raad van Toezicht decides instead (article 8.2).

Conflicts of interest. Anyone with a personal interest in a decision discloses it in writing and takes no part in the decision. Agreements with related parties are made at arm's length and need the prior approval of the Raad van Toezicht.

Integrity. The directeur-bestuurder and every member of the Raad van Toezicht meet the ANBI integrity requirement (articles 5.1 and 10.1).

9. Remuneration policy

Group	Policy
Raad van Toezicht	No remuneration. Costs actually incurred are reimbursed against receipts (article 10.7).
Directeur-bestuurder	No remuneration for the directorship itself (article 5.4). Paid for the executive role under an employment contract. The Raad van Toezicht sets the pay against the CAO Sociaal Werk, at or below the benchmark midpoint. He takes no part in that decision. The amount is disclosed in the annual accounts.
Staff and contractors	Benchmarked against the CAO Sociaal Werk, set at or below the benchmark midpoint.
Volunteers	Unpaid. Costs actually incurred may be reimbursed against receipts.

No pay is linked to surplus, turnover or fundraising results. No one receives a share of profit. The full Recruitment and Remuneration Policy is published on the website.

10. Dissolution

If the foundation is dissolved, any remaining assets go to an ANBI with a similar objective, or to a foreign institution that serves the general benefit and has an objective as similar as possible (article 18.5).

11. Adoption

This plan was adopted by the directeur-bestuurder after the prior approval of the Raad van Toezicht on 30 October 2026 (article 12.4 a). It is reviewed every year, and sooner if the articles or the governance structure change.