lexpopuli

POLICY PLAN

1. Introduction

Mission: Stichting Lex Populi (LP) breaks down the barriers that prevent people and communities from living in just and peaceful societies. Around the world, civic space is shrinking, governments fail to serve the vulnerable, and rapid technological changes threaten human rights. LP works with local partners to foster participation, defend civic freedoms, and ensure that governance, justice, and technology work for the people

Vision: People and communities enjoy more just and peaceful lives.

Values:

- **Commitment to local partners;** We are driven by a passionate commitment to our local partners. Through respectful dialogues and exchanges we help them become resilient advocates for progress, justice and sustainable growth.
- **Commitment to human rights;** We believe that ensuring respect for and protection of fundamental human rights and democratic principles is crucial to promoting peace and prosperity across all sectors and communities.
- **Commitment to responsible stewardship and building trust;** We are committed to serving as a trusted and responsive convener and intermediary for partners and funders.

Background of the foundation: LP is an independent not-for-profit foundation based in the Netherlands and founded as a sister organization by the **East-West Management Institute** (EWMI). Building on EWMI's more than three decades of experience advancing democratic governance, rule of law, media integrity, and civil society resilience worldwide, **LP inherits EWMI's expertise** in supporting governments, independent media, and civil society actors to address complex governance and human rights challenges.

2. Objectives

Statutory purpose: The objective of the foundation is to strengthen justice, human rights, civic space, and democratic institutions

Public benefit objective: LP's work is meant to support and improve rights and justice for all, especially the most marginalized and vulnerable. The beneficiaries are a broad and open group of people. The foundation generally operates internationally, but also seeks to foster collaboration, cultural and educational exchanges between our international partners and Dutch counterparts/entities, and to host learning events in the Hague. All of LP's activities are intended to serve the general public benefit by supporting access to justice, rule of law and human rights globally, which contributes to poverty reduction and global relief efforts. LP also intends to support environmental and conservation efforts internationally through its partnerships with indigenous and forest communities in SE Asia. Finally, by promoting the values of The Hague -- international cooperation and human rights – LP will directly and indirectly benefit the public both in the Netherlands and internationally.

3. Planned Activities

The foundation attempts to achieve its objective by, inter alia:

a. Providing grants and other support to partners to defend their civic freedoms, advance civic participation, strengthen the rule of law and freedom of expression, and ensure that advances in technology work for the people, through collaborative partnerships with civil society and other stakeholders throughout the world; and

b. Providing training and collaborative learning opportunities to partners committed to strengthening human rights, democracy, and access to justice.

Target groups and geographical focus: LP will directly and indirectly benefit the public both in the Netherlands and internationally.

4. Fundraising and Sources of Income

The foundation's funds are acquired from:

a. Contributions and grants from Dutch, European, US and other international donors;

b. Grants from bi-lateral and multi-lateral government donors;

c. Donations and gifts from individuals and companies;

d. Investment income (if applicable); and

e. Other lawful sources of income.

5. Management of Assets and Income

The foundation shall have a financial asset management strategy policy.

Management of Funds Received: Revenue is recognized in accordance with Dutch GAAP and RJ 650, distinguishing between:

Contribution Revenue (Donations and Grants):

- *Unrestricted contributions:* Recognized when received or when the promise is made (bij giftbelofte), provided collection is probable

- *Temporarily restricted contributions:* Recognized as net assets with donor restrictions; released from restriction when the purpose is met or time restriction expires
- *Permanently restricted contributions:* Recognized as permanent endowment (if applicable)

Banking Arrangements: The Foundation maintains banking relationships with reputable Dutch financial institutions, including a Current account and a Savings account for reserves.

Financial Controls: The LP Financial Management Policy outlines internal controls, including documentation standards, recording and classification of transactions, authorization and approval hierarch, segregation of duties, specifications regarding access to and accountability for resources, and audit and audit resolution requirements,

Investment Policy: The foundation's financial assets are to be invested in such a way as to ensure that the greatest possible security and profitability is achieved while maintaining an appropriate mix and diversification of financial assets as well as an adequate liquidity reserve at all times. The asset management strategy shall also consider and minimize potential adverse environmental and social impacts of investments. The foundation shall not invest in shares or any similar derivative instruments which directly or indirectly entitle or may entitle the foundation to hold or exercise voting rights and which are listed on a stock exchange.

6. Expenditure of Funds

Expenditure of Funds: LP is committed to the highest standards of transparency and public accountability, including ensuring that the use of income is to advance LP's objectives so that 90% of activities serve the public interest, with a particular focus on strengthening human rights, democratic governance, access to justice, civic participation, freedom of expression, and the capacity and resilience of civil society organisations and other public interest actors. LP also intends to support environmental and conservation efforts internationally through its partnerships with indigenous and forest communities in SE Asia. Finally, by promoting the values of The Hague -- international cooperation and human rights – LP will directly and indirectly benefit the public both in the Netherlands and internationally.

Use of Income and Funds: The grants, donations and investment income that LP receives will primarily be used to design and implement programmes that advance human rights, democratic governance, access to justice, civic participation and other areas within LP's public benefit mission. Specific activities may include:

- Strengthen the organisational, institutional and technical capacity of civil society organisations, human rights defenders, community organisations and other public interest actors;
- Support research, analysis, training, knowledge-sharing, advocacy and public awareness initiatives addressing issues relevant to human rights, democratic

governance, access to justice, civic participation, freedom of expression, and environmental and conservation efforts;

- Provide grants or other forms of financial or technical support to eligible civil society organisations, initiatives and projects that contribute to LP's public benefit objectives; and
- Support innovation and the responsible use of technology to promote human rights, civic participation, transparency, accountability and access to information and justice.

The grants, donations and investment income that LP receives cover the reasonable and necessary costs of administering, monitoring, evaluating and delivering these activities.

Principles for Grant-Making and Programme Implementation: Where LP provides grants or other financial support, funding decisions will be based on transparent, objective and consistent criteria. These will include the relevance of the proposed activity to LP's public benefit objectives, the anticipated public benefit and impact, the capacity of the applicant or implementing partner, the feasibility and sustainability of the proposed activity, and the reasonableness of the proposed budget.

LP will seek to ensure that grant-making and programme implementation are conducted in accordance with appropriate principles of fairness, accountability, transparency and non-discrimination. Where appropriate, calls for proposals, competitive selection processes, due diligence and documented assessment procedures will be used.

Recipients of grants or programme funding may be required to provide budgets, implementation plans, financial reports, narrative reports and other documentation demonstrating that funds have been used for their intended purposes. LP will maintain appropriate oversight and monitoring mechanisms and may take corrective measures where funds are not used in accordance with agreed purposes.

LP may implement activities directly or through grants, sub-grants, partnerships, contracts, consultancy arrangements or other appropriate mechanisms. Programme and grant expenditure will be subject to the foundation's internal financial controls, approval procedures and applicable procurement and due diligence requirements.

Administrative and Operating Costs: LP will seek to ensure that expenditure is reasonable, proportionate and clearly connected to its public benefit objectives. LP may use a reasonable and proportionate part of its income and assets to meet the administrative and operating costs necessary for the effective pursuit of its public benefit objectives.

Use of Assets and Prevention of Private Benefit: LP's assets and financial resources will be used solely in furtherance of its public benefit objectives and in accordance with its articles of association, applicable Dutch law and the requirements applicable to an ANBI.

LP's assets will not be used to provide private benefits to its founders, board members or other individuals or organisations, except where payments are made for expenses and are reasonable, properly authorised and consistent with LP's policies.

LP will maintain appropriate financial administration, internal controls and supporting documentation to demonstrate that its income and assets are applied in furtherance of its public benefit objectives. Financial decisions will be taken in accordance with the LP's governance and financial procedures and will be subject to appropriate oversight by the Supervisory Board.

Any reserves maintained by LP will serve a legitimate purpose connected to the continuity and effective implementation of its public benefit activities, including maintaining financial stability and meeting future programme and operational commitments.

Dissolution: If LP is dissolved, any remaining assets will be distributed in accordance with its articles of association and applicable Dutch law. The remaining assets will be transferred to an ANBI or another institution that is exempt from Dutch corporate income tax and that has a public benefit objective that is substantially similar to that of LP, to the extent required by the applicable ANBI rules.

7. Governance – basic internal policies

The Foundation maintains separate governance and operational policies, including a Code of Conduct (which includes provisions related to conflicts of interest and antibribery and anti-corruption), Financial Management Policy, Procurement Policy, Data Protection Policy, Whistleblower Policy, and Record Retention Policy. These policies support the effective, transparent, and accountable implementation of the Foundation's activities and are reviewed periodically by the Supervisory Board.

LP shall maintain a Supervisory Board of at least three members. The Supervisor Board is responsible for the following:

Strategic Responsibilities

- Monitoring the external environment and signaling relevant developments to the Management
- Ensuring the Foundation's mission remains relevant and is pursued effectively
- Contributing the members' own networks, expertise, and knowledge in support of the Foundation's mission

Financial Oversight

- Approving the annual budget and annual accounts
- Approving material financial transactions and investments exceeding thresholds determined by the Supervisory Council
- Overseeing the Foundation's financial asset management strategy

- Appointing a chartered accountant (*registeraccountant*) every three years through a competitive process of at least three offers, to audit the annual accounts and accounts
- Ensuring the Foundation maintains its ANBI tax-exempt status
- Approving any changes to the Foundation's banking relationships

Governance and Compliance

- Overseeing the Foundation complies with all applicable Dutch laws and regulations
- Overseeing adherence to the *Goede Doelen Nederland* governance code
- Overseeing the Foundation's risk management and internal control systems
- Overseeing compliance with AVG/GDPR data protection requirements
- Approving amendments to the articles of association
- Approving the dissolution of the Foundation
- Approving any legal merger or demerger
- Approving the Foundation's standing rules and other regulations

Human Resources and Remuneration

- Appointing, suspending, and dismissing Management
- Determining the number of Management Board members
- Setting the remuneration policy for employed Management Board members in accordance with the *Goede Doelen Nederland* Guideline on Remuneration of Directors
- Conducting annual performance reviews of Management Board members
- Overseeing succession planning for both the Management Board and the Supervisory Council itself

Transparency and Accountability

- Ensuring the Foundation publishes its annual report and accounts publicly
- Producing an annual report on the Supervisory Council's own activities as part of the Foundation's annual report
- Ensuring compliance with reporting requirements of funders and grant-making bodies
- Overseeing the Foundation's communications and public accountability policies

Conflict of Interest: LP Supervisory Board members are subject to the LP Code of Conduct, which requires them to perform their duties honestly, diligently, competently and in good faith, and to disclose any actual or potential conflict of interest.

Remuneration Policy: LP has developed a remuneration policy which affirms that Supervisory Board members serve on a voluntary basis and are only eligible for reimbursement of actual, reasonable and necessary expenses. The LP policy requires that remuneration of Supervisory Board members is disclosed in financial statements. Management and staff remuneration are set at market levels for nonprofit sector and are reviewed by the Supervisory Board annually.

8. Financial Accountability

The foundation will maintain a complete, accurate, and up-to-date financial administration in accordance with Dutch accounting standards applicable to foundations. All income, expenditures, assets, liabilities, grants, donations, and other financial transactions will be recorded in a structured bookkeeping system and supported by appropriate documentation, including invoices, contracts, receipts, bank statements, and grant agreements.

The foundation will use a dedicated bank account for all organizational transactions and ensure that all financial records are retained for at least seven years in accordance with Dutch legal requirements. Financial administration will be carried out under the supervision of the board, with appropriate segregation of duties where feasible. Payments will require authorization in accordance with the foundation's internal financial procedures.

During its initial years, the foundation may engage an external accountant or bookkeeping service to assist with maintaining its financial administration and preparing the annual financial statements, while overall responsibility remains with the Managing Director, who will report regularly to the Supervisory Board.

Annual financial statements will be prepared, including a balance sheet and statement of income and expenditure, and approved by the board. The foundation will publish the financial information required under the ANBI transparency requirements on its website and will comply with all applicable Dutch legal and tax obligations. Annual external audits are envisioned.

9. Monitoring and Review

The Supervisory Board is will annually monitor progress against objectives through a combination of desk review of reports, site visits if applicable, and other monitoring and evaluation. The Board reviews the policy plan annually and undertakes a comprehensive update at least every three years, or earlier if significant changes occur in the foundation's activities, governance, or operating environment.