



# International CSR (Corporate Social Responsibility) Policy Gooimeer

## 1. Mission

International CSR Policy.

Gooimeer recognizes that business activities have an impact on social and environmental issues. Wherever we operate, we strive to avoid causing or contributing to negative impacts on employees, human rights, the environment, corruption, consumers and corporate governance. Moreover, we strive to facilitate repair and restoration.

As a responsible company, we are committed to social and environmental due diligence as stipulated in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs). We have joined the International Metal Sector CSR Covenant, a multi-stakeholder initiative to implement individual and collective due diligence; and to jointly develop long-term solutions to address social and environmental risks in global metal and mineral supply chains.<sup>1</sup>

## 2. Our principles

Gooimeer respects and upholds internationally recognized human rights as outlined in the Universal Declaration of Human Rights, enshrined in the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, and articulated in specialized human rights treaties such as the Convention on the Rights of the Child (CRC) and the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), treaties that address the needs of particularly disadvantaged, marginalized and vulnerable groups of people around the world.<sup>2</sup>

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<sup>1</sup> <https://www.imvoconvenanten.nl/nl/metaalketens>

<sup>2</sup> According to Principle 12 of the UNGPs, companies are expected to respect specific standards applicable to potentially vulnerable or marginalized groups. Note: "Depending on the circumstances, companies may need to consider additional standards. For example, companies should respect the human rights of individuals belonging to specific groups or populations that require special attention when it may adversely affect them. In this regard, United Nations instruments have specified the rights

Moreover, with respect to labor standards, we commit ourselves specifically to the principles related to fundamental rights contained in the core conventions of the International Labor Organization (ILO), as set forth in its Declaration on Fundamental Principles and Rights at Work.

With respect to environmental standards, we are committed to aligning our policies and activities with the principles and decisions of international environmental agreements, in particular the Convention on Biological Diversity (CBD), the United Nations Framework Convention on Climate Change (UNFCCC) - in particular the 2015 Paris Agreement and the United Nations Convention to Combat Desertification (UNCCD). - We will comply with international and national environmental regulations, standards and best practices at all times.

### **3. Approach: due diligence, stakeholder engagement, remediation**

Gooimeer has embraced the six-step approach of the OECD Due Diligence Guide to Corporate Social Responsibility. The key features of this due diligence process are as follows:

- the process is aimed at "demonstrating" that our principles are not violated when doing business;
- it consists of:
  - Embedding responsible business practices into policies and management systems;
  - Identifying and assessing (potential) negative impacts;
  - Integrating and acting on the findings (stopping, preventing or reducing negative impacts);
  - Evaluating the effectiveness of the approach;
  - Communicating on how negative effects will be addressed;
  - Ensuring or cooperating with access to recovery where appropriate;
- it applies to Gooimeer's own operations and to its relationships with suppliers and other business associates;
- it differs from other due diligence activities in that it focuses on negative impacts on individuals, communities, their environment and on their rights, rather than on risks to the company;
- the process is regularly reviewed and updated as necessary because risks can change over time, meaning due diligence is an ongoing process.

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of indigenous peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families."

We will work with suppliers and other organizations to increase our influence to address and reduce potential negative impacts. As a last resort, withdrawal is an option if a supplier or business partner refuses to prevent impacts after a notification and warning process, as long as it does not adversely affect Gooimeer's operations to the extent that it threatens continuity.

With respect to stakeholder engagement, Gooimeer recognizes that human and environmental risks require meaningful engagement with internal and external stakeholders. To this end, we work with both internal and external stakeholders, including our most vulnerable groups, on our corporate social responsibility policies and strategies and to help us define and understand our (potential) social and environmental impacts.

Stakeholder engagement is particularly important with respect to identifying, assessing and providing repair of negative impacts among our stakeholders. In the event that we cause or contribute to negative impact, we will endeavor to (cooperate to) remedy the situation through legitimate processes. Gooimeer is therefore committed to having a grievance mechanism, both for employees and for other relevant stakeholders. We will publicly report on the handling of complaints. In situations where we are directly linked to negative impacts on human and environmental rights due to activities in our supply chain, we will seek to use our influence to prevent or reduce those impacts.

#### **4. Scope**

This policy applies to (1) all employees of Gooimeer. It also applies, to the extent reasonably practicable, to (2) our upstream and downstream chains through partners, suppliers and external contractors.

##### **(1) Employees**

Gooimeer treats all its employees with respect and dignity and promotes diversity and inclusion in the workplace. Our company policies and procedures adhere to all applicable national laws and are consistent with ILO core labor principles, including freedom of association and collective bargaining, non-discrimination, equal pay and the elimination of forced and child labor.

For this, we also refer to our Personnel Manual dated January 2022.

##### **(2) Suppliers, contractors and other business partners**

Gooimeer expects its customers, suppliers and their respective supply chains and other business partners to comply with the obligations set out in this policy.

We are committed to working with our business partners to implement the OECD Guidelines for Multinational Enterprises to ensure supply chain transparency and establish long-term sustainable relationships.

## **5. Serious and probable risks**

'Salient' environmental and human rights risks and violations are the most serious impacts a company (or its business relationships) can have on people or the environment. We intend to further review our areas of salient impact, assess their likelihood and severity to prioritize our impacts for risk management and enable us to proactively address them. Therefore, our areas of serious impact are constantly evolving and are part of our due diligence commitment.

## **6. Rule of law and conflicting requirements**

In all situations and contexts, and in all jurisdictions, Gooimeer will comply with applicable laws and international standards, respect the rule of law or this policy, and strive to respect internationally recognized human rights and environmental standards. We will seek ways to respect the principles of internationally recognized human rights and environmental standards when faced with conflicting or unclear requirements.

## **7. Endorsement and Monitoring**

This policy statement has been endorsed by the Gooimeer board and will be overseen at the board level by Patrick Stoelhorst and Richard Janssen. Gooimeer will report on the progress of the implementation of this policy in the annual ISO Policy Plan 9001:2015. The policy will be reviewed periodically to ensure that it continues to meet our objectives.

# Annex 1: Examples of serious risks<sup>3</sup>

## *Non-discrimination:*

*In all aspects of employment, including hiring, compensation and benefits, training, promotion, transfer and termination, we will treat individuals fairly and in a non-discriminatory manner based solely on their ability to meet the requirements and standards of their position. We will do so without regard to factors such as (but not limited to) race, religion, color, ethnic or national origin, disability, sexual orientation, gender or marital status.*

## *Fair pay/compensation:*

*Every employee is entitled to compensation for a normal workweek sufficient to meet the employee's basic needs and provide disposable income. Our business partners must pay at least the minimum wage or prevailing wage, whichever is higher, comply with all legal requirements for wages and provide all non-statutory benefits required by law, collective bargaining agreement or contract. If the compensation paid does not meet employees' basic needs and does not provide disposable income, our business partners are obliged to take appropriate measures to gradually achieve a compensation level (if present in cooperation with the union represented in the company).*

## *Child labor:*

*No use is made of child labor. No recruitment of child labor takes place. If child labor is identified in the supplier's sector and region, the supplier will initiate or participate in a program to give children involved in child labor access to quality education until they are no longer children. No one under the age of eighteen shall be employed at night or in hazardous conditions. In this code, "child" means anyone under the age of fifteen, unless national or local law prescribes a higher compulsory education or a minimum age to work, in which case the higher age shall apply; and "child labor" means any work by a child or young person unless it is deemed acceptable under the ILO Minimum Age Convention 1973 (C138).*

## *Freedom of association/collective bargaining:*

*Employees' rights to join a union and bargain collectively, as permitted by local laws and regulations, must not be impaired or limited. In situations or countries where rights related to freedom of association and collective bargaining are restricted by law, parallel means to freedom of association and collective bargaining must be facilitated by the vendor for all personnel.*

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<sup>3</sup> From: [A Guide for Business: How to Develop A Human Rights Policy](#) (UN Global Compact, 2015).

*Rights of Indigenous Peoples:*

*We respect the diversity of indigenous peoples and recognize the unique and important interests they have in the land, waters and environment, as well as their history, culture and traditional ways. Wherever we operate, we work with communities and seek to understand the social, cultural, environmental and economic implications of our activities so that we can respond to concerns and work to optimize benefits and reduce negative impacts, both to the local community and to the overall economy.*

*Security:*

*We allow armed security only when required by law or when we believe there is no other way to manage security risks. All armed guards must meet our standards, based on UN guidelines and conventions on the use of force and the Voluntary Principles on Security and Human Rights.*