



PROTECT & PERFORM

SUBSTANTIATION TO NEN-ISO 26000 SELF-
DECLARATION



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Date	13 September 2016
Location	Aalten

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1) Introduction

Innclose B.V. (hereafter referred to as Innclose) is located in Aalten (NL) and designs, produces and installs innovative custom-made housings for the production and process industry. The company offers solutions in the field of thermal insulation, sound insulation, radiation protection, soundproofing, as well as cooling and heating. Innclose is a preferred supplier for a number of (international) organisations that are active in the uranium enrichment industry. Innclose has a certified ISO 9001 Quality Management System and a VCA* certified HSE management system.

Innclose is aware of its social responsibility concerning the effects that its operations have on a social (People), ecological (Planet) and economical (Profit) level. In all its decision making, Innclose aims to contribute actively to the sustainability of these three Ps in the regions in which it is active, all this in accordance with the principles and guidelines of NEN-ISO 26000. This document contains the ISO 26000 self-declaration drawn up by Innclose, as well as a substantiation to this self-declaration.

K.Wenting
QHSE coordinator

C.Kuijer
Managing director

2) 7 principles of Corporate Social Responsibility

2.1 Introduction

According to ISO26000, a principle is 'a fundamental basis for decision-making or behaviour'. This means that these principles must be observed as much as possible for each activity and each decision. The ISO 26000 guideline describes seven CSR principles. These principles will be discussed in this chapter. The seven principles are:

- Accountability
- Transparency
- Ethical behaviour
- Respect for stakeholder interest
- Respect for rule of law
- Respect for international norms of behaviour
- Respect for human rights

2.2 Accountability

Innclose is accountable for its impacts on society, the environment and the economy, and particularly for possible negative impacts. At all times, Innclose shall be responsible for its impact on society and the environment. The impact of the company on the environment is mainly the result of energy, fuel consumption and the management of waste streams. In order to keep this consumption under control, a dashboard is presented every quarter, showing the consumption of that period. Any peaks are discussed and possibly avoided in the future.

2.3 Transparency

Innclose provides openness concerning its decisions and activities that impact on society and the environment. Decisions and/or activities that impact on society and the environment are communicated to the stakeholders concerned. This shall take place in time, with an objective and clear message. The organisation also wishes to give expression to this transparency by means of this CSR self-declaration.

2.4 Ethical behaviour

Innclose behaves in an ethical way. By ethical behaviour we mean that Innclose will act honestly, fairly and honourably at all time. Innclose will include the interests of the different stakeholders in its operations and is committed to dealing with people and the environment with care and respect. The organisation communicates its core values and principles. The norms of behaviour expected from different people (employees, hired staff, suppliers & partners) are also clear.

2.5 Respect for stakeholder interest

Innclose respects, considers and responds to the interests of its stakeholders. It is known who the stakeholders are. Innclose has a long-term focus, whereby good relationships with customers, co-producers, suppliers and employees have high priority. The long-term continuity and the relations that Innclose has with its stakeholders are inextricably linked.

2.6 Respect for rule of law

Innclose respects the applicable legislation and regulations. The organisation acquaints itself with the applicable legislation and regulations. Innclose observes this legislation and these regulations and will inform its employees concerning this legislation and these regulations. Innclose will periodically assess whether there are new developments in the applicable field in relation to legislation and regulations. For this, Innclose has entered into an agreement with a lawyer who will closely monitor these developments.

2.7 Respect for international norms of behaviour

The international norms of behaviour are observed by Innclose. As legislation and regulations do not always sufficiently protect society and/or the environment, it is important to respect the international norms of behaviour. Innclose will not start any activities in areas where these norms of behaviour are not observed.

2.8 Respect for human rights

Innclose respects and observes the universal human rights. Situations in which human rights are insufficiently protected will not be misused and no advantage will be taken of such situations. Innclose will also only do business with organisations within which the universal human rights are observed.

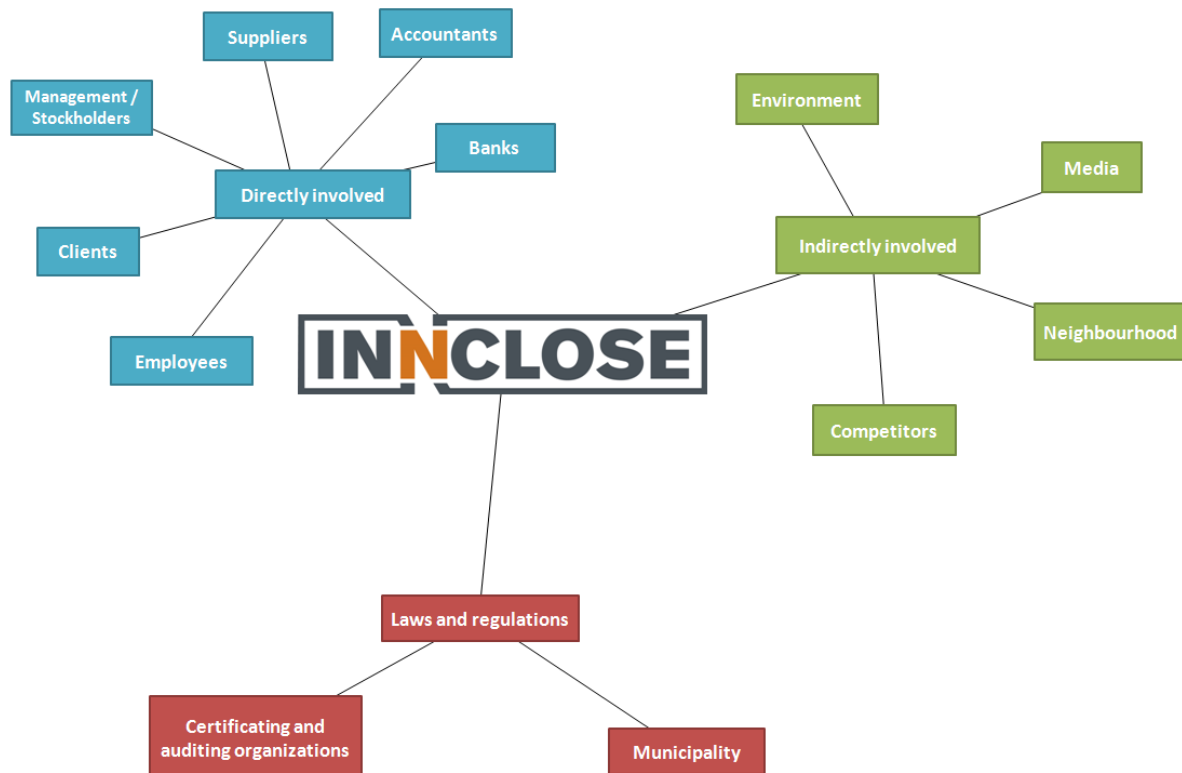
3) Stakeholders

3.1 Introduction

Stakeholders are organisations or persons who are affected by the activities and decisions of an organisation. That is why they have an interest in what the organisation does and decides and why they are also referred to as interested parties. Examples are customers, suppliers, industrial and professional associations, trade unions, NGOs, (local) governments, financiers, employees, works councils, sister or mother companies and shareholders. This chapter provides an overview of the stakeholders of Innclose. It is also indicated what is being done with the relationships with these stakeholders.

3.2 Identification of the organisation's stakeholders

Below you will find a diagram containing the stakeholders that Innclose has to deal with regularly:



3.3 Engaging stakeholders

In order to stimulate Corporate Social Responsibility within the company and within the chain, it is important to engage the stakeholders with the CSR policy. Below you can see the stakeholders that Innclose has the most contact with and the method of communication:

Employees: through daily communication on the work floor and periodical team consultations

Customers: through reflections/audits concerning customer requirements and customer satisfaction evaluations.

Suppliers: through reflections/quality reports/external audits concerning the requirements of Innclose.

Management/shareholders: manager/shareholder and managers with personnel are in 1 premises, which means that there is daily communication.

Certification / Audit organisations: through various audits taking place at Innclose.

4) 7 Core Themes concerning CSR

4.1 Introduction

The integral CSR approach according to ISO 26000 comprises seven CSR core themes, which are relevant for each organisation. Below are the seven CSR core themes that comprise this chapter:

- Organisational governance
- Human rights
- Labour practices
- The environment
- Fair operating practices
- Consumer issues
- Community involvement

4.2 Organisational governance

The management of Innclose is formed by Mr C. Kuijer, General Director and owner of the company. All Innclose BV shares are in the possession of Conico B.V., the personal holding of Mr Kuijer. Achieved turnover and profit are communicated to the employees during the periodical meetings.

Innclose propagates the following core values in order to shape the vision and mission, both internally and externally:

- Partnership through sharing of knowledge
- Innovative; limitless curiosity
- Teamwork based on mutual respect
- Balance between people, planet and profit

The core values are a point of departure for all activities and become visible, audible, and tangible through the behaviour of the organisation both inside and outside the company.

4.3 Human rights

Innclose respects and observes the universal human rights. Situations in which human rights are insufficiently protected will not be misused and no advantage will be taken of such situations. Innclose will also only do business with organisations within which the universal human rights are observed.

4.4 Labour practices

Safety has the greatest priority at Innclose, for which reason the organisation is VCA certified. Innclose is always open to trainings/courses or other investments in order to guarantee personnel safety. Accidents are registered and periodically reported to the whole organisation, in order to increase awareness and thus safety. Personal protective equipment is supplied in sufficient quantities. There are tools present for lifting, such as cranes, hoists, etc. Employee ergonomics are assessed periodically.

4.5 The environment

Environmental responsibility is also a priority at Innclose. To the extent possible, the organisation makes every effort to limit any adverse effects on the environment caused by its operational activities.

Innclose supplies solutions that contribute to creating a better environment at its buyers. Using materials such as mineral insulation with a high insulation value saves energy, reduces noise, avoids fire hazards and creates a safe working environment.

Energy-saving measures such as lighting sensors have been introduced in offices and production facilities. Constant monitoring and monthly evaluation of energy consumption ensure high energy awareness among the employees.

Innclose uses the principles of sustainable waste management, including minimising waste and separate collection. The organisation is continuously striving for further optimisation here. To do this we work together with a leading waste processor in the field of sustainability and CSR.

4.6 Fair operating practices

Fair operating practices concerns the behaviour in relation to relations such as suppliers, customers, competitors and government organisations. This behaviour is important for entering and maintaining relationships. Innclose will be honest, fair and honourable at all times. Both towards relations and internally.

4.7 Consumer issues

Innclose does not produce products for private customers, which means that many topics of this theme do not apply. Innclose does have a responsibility when it comes to protecting customer data. In order to protect customer privacy, Innclose uses a privacy policy. Innclose is able to guarantee that all customer data are in safe hands and that they will not be provided to third parties.

4.8 Community involvement

Innclose wants to be as open and transparent as possible about its efforts concerning sustainability and corporate social responsibility. This CSR self-declaration is a good example of this. In addition, Innclose is involved with sponsoring various projects.

Innclose sponsors initiatives such as Alpe d'Huzes and makes an active and financial contribution to supporting the disadvantaged in India. Innclose also assists with regional activities such as Achterhoek 2020.

5) 37 CSR sub-themes

5.1 Introduction

The following matrix discusses the 37 CSR topics and considers whether these are relevant and/or significant for Innclose. Finally, it will also be considered whether there are any priorities. If action has already been taken for the topic, there will be a **V** in the 'Priority' column. If quick action is required for the topic, there will be an **X** in the 'Priority' column.

5.2 Sub-themes

Organisational governance		Aspects	Relevant?	Significant?	Priority?	Relevance
1	Organisational governance	Based on the CSR principles. Decision making and execution processes make it possible to implement SCR principles and relevant core themes.	Yes	Yes	V	It is important for Innclose to be as transparent as possible towards stakeholders. Innclose includes the CSR principles in decisions made by the organisation.
Human rights		Aspects	Relevant?	Significant?	Priority?	Relevance
2	Due diligence	Developing and purchasing carefully in relation to human rights.	Yes	Yes	V	Innclose is not involved with activities that violate human rights. In addition, Innclose does not have any relations with organisations that do.
3	Human rights risk situations	Doing business in countries where the situation is insecure (in relation to conflicts or welfare).	No	No	X	Innclose has never done business with countries in conflict zones and will never do so.

4	Avoidance of complicity	Doing business with parties that are (in)directly involved with violating human rights.	Yes	Yes	V	Innclose will do everything in its power not to get involved with the violation of human rights, both directly and indirectly.
5	Resolving grievances	Good complaints procedure.	Yes	Yes	V	For continuity in the relationships with customers and employees, correct complaint processing is of great importance. For this, Innclose developed and uses a system of quality reports.
6	Discrimination and vulnerable groups	Equal conditions for all employees, including vulnerable groups.	Yes	Yes	V	Discrimination on the grounds of skin colour, gender, origin, faith or sexual orientation is fully contrary to the social policy and is not tolerated at Innclose: not in its employment, dismissal and promotion policy, but also not during daily interaction.
7	Civil and political rights	Respect for country specific legislation and regulations.	Yes	Yes	V	Innclose respects both Dutch and European legislation and regulations. In the countries where Innclose performs work, the local laws are also observed.
8	Economic, social and cultural rights	Respect for the right of: education, work, freedom of association, sufficient health standard and life standard and necessary social protection, practising a faith or culture.	Yes	Yes	V	Innclose respects these rights. Employees have the opportunity to develop themselves and are free in practising their faith or culture.
9	Fundamental principles and rights at work	Freedom of association and effective recognition of the right of collective bargaining. Equal opportunities, no discrimination.	Yes	Yes	V	Everyone is treated equally at Innclose. The employees are able to establish employee representation, something that the employees of Innclose do not feel is necessary at this moment. This is checked every year.

Labour practices		Aspects	Relevant?	Significant?	Priority?	Relevance
10	Employment and employment relationships	Clear, lawful labour contracts, equal opportunities for everyone, protection of employee privacy.	Yes	Yes	V	Innclose uses clear lawful labour contracts for its personnel. The employees' privacy is protected.
11	Conditions of work and social protection	Fair remuneration, overtime compensation. Working hours, rest, health, safety, social protection, childcare, etc. Respect for national and religious traditions.	Yes	Yes	V	Employees at Innclose get a fair remuneration for the work provided. In relation to rest and working hours, the normal situation is not deviated from and the regulations are not violated.
12	Social dialogue	Dialogue with major stakeholders, such as neighbours.	Yes	Yes	V	Innclose works as transparently as possible towards its stakeholders. If it is necessary to enter into a dialogue, this will not be avoided.
13	Health and safety at work	preventive medical examination, company emergency response.	Yes	Yes	V	Preventive medical examinations are performed periodically. There are company emergency response team members in the building at all times.
14	Human development and training in the workplace	Training and supervision, career growth potential and/or variation possibilities, social plan in case of involuntary dismissal.	Yes	Yes	V	Each employee is equally entitled to development, growth potential and a social plan. Innclose attaches great importance to the development of its personnel.

The environment		Aspects	Relevant?	Significant?	Priority?	Relevance
15	Prevention of pollution	Air emissions, spills, soil contamination, noise, odour, radiation, view, vibrations, bacterial, toxic and hazardous chemicals. Short-term impact, long-term impact. Careful handling of material/waste, solid, fluid.	Yes	Yes	V	Innclose uses the principles of sustainable waste management, including minimising waste and separate collection. The organisation is continuously striving for further optimisation here. Hazardous detergents have been replaced by biodegradable agents.
16	Sustainable resource use	Energy consumption, fuel consumption (transport), use of gas for heating.	Yes	Yes	V	Environmental responsibility is also a priority at Innclose. To the extent possible, the organisation makes every effort to limit any adverse effects on the environment caused by its operational activities. Innclose heats the production halls by means of gas-fired heaters.
17	Climate change mitigation and adaptation	Reduce the use of fossil fuels.	Yes	Yes	V	Innclose supplies solutions that contribute to creating a better environment at its buyers. Using materials such as mineral insulation with a high insulation value saves energy, reduces noise, avoids fire hazards and creates a safe working environment.
18	Protection of the environment, biodiversity and restoration of natural habitats.	Reporting the impact on the environment.	Yes	Yes	V	Constant monitoring and monthly evaluation of energy consumption ensure high energy awareness among the employees.

Fair operating practices		Aspects	Relevant?	Significant?	Priority?	Relevance
19	Anti-corruption	Whistle blower scheme, fair bonuses/commissions, having performance assessed in relation to correctness.	Yes	Yes	V	Each employee and former employee of Innclose has a duty of confidentiality. If necessary, fitting steps will be taken. Moreover, Innclose does not aid corruption in any way.
20	Responsible political involvement	Political lobby is honest and transparent, no intimidation.	No	Yes	X	Innclose does not have any possibility to exert pressure on politicians.
21	Fair competition	Suppliers get the same information, realistic requirements towards suppliers, fair and clear contract terms.	Yes	Yes	V	Fair competition is at the basis of sustainable relationships with customers and buyers. Therefore, Innclose shall observe legislation and regulations at all times.
22	Promoting social responsibility in the value chain	Stimulating CSR at stakeholders.	Yes	Yes	X	Is currently not an issue.
23	Respect for property rights	Respect for physical and intellectual property.	Yes	Yes	V	Innclose respects all rights and regulations relating to property and patents.

Consumer issues		Aspects	Relevant?	Significant?	Priority?	Relevance
24	Fair marketing	Fair and clear contract terms, factual representation of performances, service provision and price.	Yes	Yes	V	Innclose provides clear information concerning its contract terms, service provision and price.
25	Protecting consumers' health and safety	Quality of services/products and possible consequences for health	No	No	X	Innclose does not supply consumer goods
26	Sustainable consumption	Sustainable purchasing, providing a collection scheme for used goods.	Yes	Yes	V	Innclose takes environmental and social aspects into account during the purchasing process.
27	Consumer service, support, and complaint and dispute resolution.	Warranty scheme and problem solving capacity.	No	No	X	Innclose does not supply consumer goods
28	Consumer data protection and privacy	Careful handling of confidential information from relations.	No	No	X	Innclose does not supply consumer goods
29	Access to essential services	Water, gas, electricity, sewerage, infrastructure.	Yes	Yes	V	Innclose is able to provide all interested parties with the essential services that are requested.
30	Education and awareness	Education concerning the use and interaction with nature and the environment.	Yes	Yes	V	Innclose supplies the required information in relation to interaction and use. Examples of this are, for instance, machine instructions, toolbox meetings and handling hazardous substances.

Community involvement and development		Aspects	Relevant?	Significant?	Priority?	Relevance
31	Community involvement	Consulting/communicating with municipality/neighbours/interested groups in case of developments that concerns them. Membership of various charities and/or local associations, supporting vulnerable groups, supporting development programmes.	Yes	Yes	V	Innclose wants to be as open and transparent as possible about its efforts concerning sustainability and corporate social responsibility. Innclose is a member of IKAD, the local association of undertakings. This association is in periodical contact with the municipality.
32	Education and culture	Access to training, stimulating and offering learning and trainee workplaces, support of (local) culture, protection of cultural heritage.	Yes	Yes	V	Innclose attaches great importance to the development of its personnel. Trainee workplaces are also offered regularly.
33	Employment creation and skills development	Participation in skills development programmes, attention for vulnerable groups, purchasing in the region, room for part-time working.	Yes	Yes	V	Products are often purchased in the region, thus creating employment. Innclose supports the Achterhoek2020 organisation, which strives for a sustainable, vigorous, attractive and healthy region.

34	Technology development and access	Cooperating with knowledge institutions, sharing knowledge (industry association), investing in sustainable innovation(s).	Yes	Yes	V	On the one hand Innclose tries to work well together with its customers to establish the demand and to address this demand as well as possible. On the other hand Innclose is also working closely with its suppliers in order to be able to guarantee good quality.
35	Wealth and income creation	Fair distribution of the benefits of economic activity, purchasing/investing in the region.	Yes	Yes	V	The method in which Innclose contributes to this can be read at point 33.
36	Health	Promoting the right to health of certain population groups or communities, improving the access to health care, promoting a healthy lifestyle.	Yes	Yes	V	Innclose permanently provides free fruit for all employees. A contract has also been entered into with a company doctor who advocates a healthy lifestyle.
37	Social investment	Seeking investments and providing expertise that immediately improves the well-being of society.	No	No	X	Is currently not an issue.

6) Integration within the organisation

6.1 Introduction

This chapter will discuss the integration of the CSR policy within the organisation. The most used method of integration is Deming's quality improvement cycle. This quality improvement cycle is also known as the PDCA cycle.

PDCA stands for:

- **Plan:** Here, the work activities are reviewed and a plan is designed to implement the improvements
- **Do:** In this phase the improvements are implemented
- **Check:** In this phase the results of the improvements are measured
- **Act:** In this phase the improvements can be adjusted, if necessary, on the basis of the checks.



6.2 Plan

In order to integrate CSR within the company properly, planning is very important. The plan for this self-declaration was initiated in the first quarter of 2015. Eventually it was executed by a new employee in order to get a new perspective on all levels within the organisation.

6.3 Do

During the execution phase two things are important, integration of CSR in the operational processes and communication concerning the project. Innclose is currently in this phase, CSR is now being integrated in the operational processes as much as possible. Externally, only little has been communicated concerning CSR.

6.4 Check

In order to assess whether the plans of the first step have gone well, it is important to continue to measure the CSR activities and results. There are various ways of doing this. For instance, it is possible to output benchmarks and draw up KPIs. An annual report on the CSR policy, the objectives and results is part of Innclose's policy.

6.5 Act

On the basis of the checks performed in the previous phase, Innclose is able to see which CSR performances must be improved. Often this takes place on the basis of consultations with stakeholders. This particularly serves to gain insight into the changes of the environment, in order to see where there are new opportunities and whether the expectations of the stakeholders have changed. As a result, it will be possible to adjust the objectives, if necessary.