

# The Common Growth Fund:

*Empowering Inclusive  
Enterprise in the  
Commonwealth*

Consulus



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# The Common Growth Fund: Empowering Inclusive Enterprise in the Commonwealth

**Prepared by:** Consulus, The FoRB Foundation, Religious Freedom & Business Foundation

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## EXECUTIVE SUMMARY

The Common Growth Fund (CGF) is a transformative, AI-powered investment initiative designed to unlock capital and capacity for social and faith-based enterprises across the 56 nations of the Commonwealth. At its core, the fund aims to advance economic dignity and opportunity for individuals affected by **Freedom of Religion or Belief (FoRB)** violations—particularly in regions where exclusion based on faith identity remains a systemic barrier to livelihoods.

FoRB violations—including religious discrimination, marginalisation of minorities, and persecution of converts—often prevent individuals from securing decent employment or participating in economic life. CGF addresses this injustice by supporting enterprises that actively promote interfaith inclusion, ethical governance, and community wellbeing.

Using a merit-based, four-stage development model backed by AI, CGF evaluates organisations for their impact potential, governance integrity, and FoRB-friendly workplace practices. All participating enterprises are assessed through two rigorous frameworks:

- **The REDI Index** – measures Religious Equity, Diversity, and Inclusion
- **The Economy of Communion (EoC)** model – captures ethical business values and community reinvestment

Enterprises are required to:

- Hire inclusively
- Reinvest one-third of profits into local NGOs
- Co-design interventions that serve FoRB-affected communities

CGF is more than a financial mechanism. It is a vehicle for restoring dignity, catalysing interfaith cooperation, and building resilient “pocket economies” that strengthen inclusive enterprise ecosystems.

We seek recognition and support from governments, institutions, and global partners to champion this model as a values-based alternative to traditional aid—one that protects belief, promotes enterprise, and builds inclusive futures.

## BACKGROUND AND RATIONALE

Social and faith-based enterprises address systemic challenges—often in fragile or marginalised communities. However, they remain underfunded due to the absence of valuation models that capture social good. In many FoRB-affected contexts, religious minorities face discrimination that limits their access to dignified work and inclusion. The CGF seeks to correct this imbalance by providing capital and support directly to inclusive, ethical, and locally rooted enterprises.

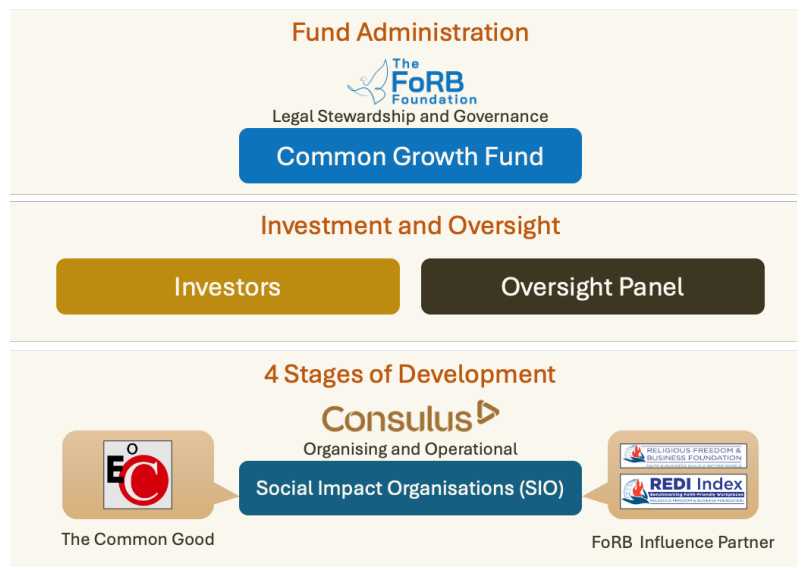
## MISSION AND OBJECTIVES

The Common Growth Fund aims to:

- Establish a \$100 million impact fund
- Apply AI to assess governance, viability, and impact
- Guide enterprises through a 4-stage growth model
- Promote FoRB-aligned hiring and workplace culture
- Evaluate performance through REDI and EoC frameworks
- Reinvest profits in local communities
- Build economically resilient and interfaith-affirming enterprises

## WHO IS INVOLVED

The success of the Common Growth Fund relies on a collaborative partnership between mission-aligned organisations and individuals who bring distinct strengths to the initiative. From strategic leadership and ethical evaluation to legal governance and interfaith advocacy, each partner plays a vital role in ensuring the fund delivers on its purpose. In addition to core partners—Consulus, the FoRB Foundation, and the Religious Freedom & Business Foundation—the CGF also engages social enterprises, investors, and an independent oversight panel, creating a unified ecosystem committed to inclusive, values-based development.



## PARTNERS

### 1. Consulus – Lead Partner - Organising and Operational

#### Role:

Consulus serves as the lead operational architect of the CGF. As a global firm specialising in ethical enterprise transformation, it designs and manages the full lifecycle of enterprise development—from evaluation and onboarding to capacity-building and performance monitoring.

#### Responsibilities:

- Design and manage the **four-stage development model** (Impact, Business, Capital, Investment)
- Operate the **ComGrowAI** platform to deliver AI-driven assessments and diagnostics
- Train and mentor enterprises, ensuring they grow responsibly and ethically
- Apply the **Economy of Communion (EoC)** framework, including its 7-dimension impact model
- Coordinate implementation logistics and operational reporting
- Draft governance documentation and fund structure in partnership with FoRB Foundation
- Participate in due diligence evaluations to ensure enterprise integrity and impact alignment

#### Financial Interests:

- **Management fees** for end-to-end coordination and enterprise support

- **Intellectual property fees** related to the EoC framework and AI platform
- **Reimbursement of startup costs** once the fund becomes operational
- Potential share of returns tied to successful enterprise listings or scale-up

## *2. The FoRB Foundation – Lead Partner - Legal Stewardship and Governance*

### **Role:**

As the legal and institutional backbone of the CGF, the FoRB Foundation (UK-based charity and US 501(c)(3)) is responsible for setting up and managing the legal structure of the fund, ensuring compliance, and stewarding its ethical direction in alignment with Freedom of Religion or Belief values.

### **Responsibilities:**

- Create and control the **legal entity** that holds and distributes the CGF investment pool
- Oversee **fund governance and compliance**, including contracts, reporting, and audit readiness
- Act as the fund's representative to **UK and Commonwealth governments**
- Lead **external communication and diplomacy** through strategic partnerships and endorsements
- Enforce safeguarding standards and ensure alignment with FoRB-based rights and protections
- Request and disburse investor pledges through a panel-approved, stage-based model

### **Financial Interests:**

- **Management and governance fees** for legal, fiduciary, and compliance services
- **Fundraising commissions** for donations and institutional pledges sourced through their networks
- Reimbursement of legal and structuring costs upon fund activation

## *3. Religious Freedom & Business Foundation (RFBF) – REDI Index and Interfaith Influence Partner*

### **Role:**

RFBF provides the **REDI Index**, the primary tool for evaluating how well an enterprise aligns with religious inclusion, workplace diversity, and FoRB-friendly practices. It also serves as an interfaith ambassador, connecting the CGF to faith-driven networks and impact investors.

## Responsibilities:

- License and manage the **REDI Index**, offering analytical benchmarks for enterprise inclusion
- Guide and support the evaluation of applicant organisations on REDI metrics
- Influence the composition and quality of **governance boards** and evaluation panels
- Advocate for CGF visibility within faith, business, and philanthropy communities
- Contribute to **fundraising efforts**, especially from interfaith and values-based investors
- Collaborate in strategic reviews, safeguarding assurance, and impact measurement

## Financial Interests:

- **Royalty/licensing fees** for the use of the REDI Index
- **Advisory and participation fees** for involvement in governance and training
- **Fundraising commissions** on donations and support they help secure
- **Cost recovery** for REDI framework development and custom adaptations

### *Summary: Partner Collaboration & Incentives*

Partner	Primary Role	Responsibilities	Financial Interests
Consulus	Operational & AI Partner	Design & manage 4-stage model, AI assessments, EoC integration	Management + IP fees, reimbursement, success-based returns
FoRB Foundation	Legal & Governance Steward	Legal structure, fund oversight, safeguarding, diplomatic relations	Governance fees, fundraising commissions, cost recovery
RFBF	REDI & Interfaith Influence	REDI scoring, advocacy, panel support, investor relations	Licensing fees, advisory fees, commissions on funds raised

## SIO SOCIAL IMPACT ORGANISATIONS

**Social Impact Organisations (SIOs)** are enterprises—whether for-profit, non-profit, or hybrid—that exist primarily to create measurable positive change in society, particularly for marginalised or underserved populations. Within the Common Growth Fund (CGF), SIOs are specifically defined as organisations that align with the values of **Freedom of Religion or Belief (FoRB)**, demonstrate a commitment to **inclusive employment practices**, and operate with a clear social mission embedded in their structure. They may work in sectors such as education, healthcare, local enterprise development, peacebuilding, or interfaith cooperation. What qualifies them is not just what they do, but **how they do it**—SIOs must show ethical governance, openness to diverse beliefs, community reinvestment, and the capacity to scale their impact sustainably. Through frameworks like the REDI Index and the Economy of Communion (EoC), CGF ensures that participating SIOs are not only mission-driven but also organisationally sound, transparent, and committed to the common good.

## INVESTORS

**Investors in the Common Growth Fund (CGF)** are individuals, foundations, faith-based institutions, development agencies, or private entities who are committed to values-driven investing and sustainable impact. They may be traditional philanthropists seeking measurable community outcomes, or ethical investors looking for blended returns—financial, social, and spiritual. What unites them is a shared belief in the dignity of all people, particularly those excluded due to Freedom of Religion or Belief (FoRB) violations. By contributing capital to CGF, investors help scale inclusive enterprises that foster interfaith cooperation, local resilience, and ethical business. In return, they receive regular performance updates, access to impact metrics, and the confidence that their capital is governed through due diligence, transparency, and safeguarding protocols. Investors are expected to align with CGF’s mission, respect its governance processes (including phased disbursement), and commit to supporting FoRB-aligned economic development with integrity and accountability.

## THE PANEL

The **CGF Evaluation and Governance Panel** is a multi-stakeholder body responsible for overseeing the integrity, effectiveness, and ethical alignment of all enterprise and investment decisions within the fund. It is composed of representatives from **Consulus** (as the operational and impact assessment lead), **The FoRB Foundation** (as legal stewards), the **Religious Freedom & Business Foundation (RFBF)** (as the REDI Index

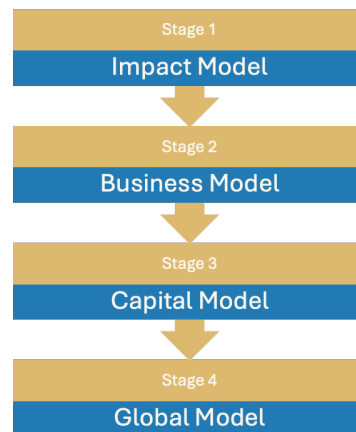
provider), and **independent advisors** with expertise in finance, enterprise development, safeguarding, and interfaith engagement. The panel's primary role is to review due diligence reports, evaluate the readiness and ethical standards of Social Impact Organisations (SIOs), approve enterprise progression through the four-stage model, and vet incoming investors. Panel members are expected to bring objective judgment, uphold the fund's FoRB and ethical criteria, ensure transparency in funding decisions, and provide ongoing oversight of performance, risk, and safeguarding. Their role is central to ensuring the CGF remains trusted, accountable, and aligned with its purpose.

## HOW IT WORKS: THE FOUR-STAGE DEVELOPMENT PATH

The **Common Growth Fund** operates as a values-based pipeline that channels capital from ethically aligned **investors** into high-potential, inclusive social enterprises. Once investors pledge funding, an independent **Oversight Panel**—comprising representatives from FoRB Foundation, Consulus, RFBF, and external experts—ensures that all governance, due diligence, and safeguarding protocols are met. Next, through **Social Enterprise Evaluation**, candidate organisations are assessed using the REDI Index and EoC framework to confirm their commitment to FoRB inclusion, ethical governance, and social impact. Those who pass are supported through **Phased Funding**, where capital is released in stages tied to performance milestones. This process ensures accountability and prepares enterprises for long-term sustainability. The ultimate goal is measurable **Community Impact**—including job creation, reinvestment in local initiatives, and interfaith economic cooperation.



The **Four-Stage Development Path** is the structured growth model used to prepare each enterprise:



Together, these four stages ensure that only mission-aligned, investment-ready enterprises progress, creating a resilient and ethical pipeline of change-makers across the Commonwealth.

### *STAGE 1: IMPACT MODEL*

This first stage is designed to identify whether an enterprise is genuinely committed to creating positive social impact—particularly in support of FoRB principles. It focuses on verifying the organisation’s mission, intent, and ethical posture through initial assessments using the REDI Index and EoC values. Enterprises admitted at this stage demonstrate potential but require structured guidance before receiving capital.

- Review of social mission and FoRB alignment
- Initial REDI/EoC compliance check
- No funding yet; enterprises enter sandbox track

### *STAGE 2: BUSINESS MODEL*

At this stage, the enterprise undergoes a comprehensive evaluation of its governance, risk profile, operations, and scalability. The goal is to determine whether it has a sound and ethical business foundation capable of delivering on its impact promises. With insights from REDI and EoC evaluations, along with AI diagnostics, this stage equips enterprises to fix gaps and prepare for investment readiness.

- Governance and business audit using AI
- REDI + EoC evaluations
- Mentorship and improvement plans

### STAGE 3: CAPITAL MODEL

This phase introduces capital support through structured, milestone-based funding. The objective is to help the enterprise scale operations responsibly while maintaining its FoRB-aligned and community-driven commitments. Regular reviews, technical assistance, and AI monitoring ensure that growth is ethical, effective, and transparent.

- Tranche-based funding (up to \$1M)
- Bi-monthly reviews and technical assistance
- Measured progress on hiring, delivery, and transparency

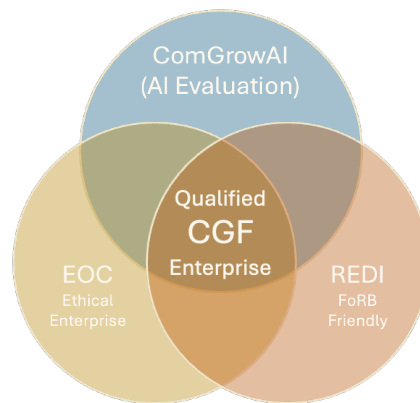
### STAGE 4: GLOBAL CAPITAL ACCESS

The final stage prepares high-performing enterprises for access to institutional, philanthropic, or private capital markets. The purpose here is to showcase these enterprises as credible, scalable models of inclusive economic development. Extensive due diligence is conducted, ensuring they meet international investment standards while continuing to uphold FoRB values and community reinvestment obligations.

- Due diligence for \$20M–\$50M investments
- Legal contracting
- Access to global philanthropic and equity capital

## EVALUATION FRAMEWORKS AND TOOLS

Evaluation frameworks are essential to the integrity and effectiveness of the Common Growth Fund (CGF). They provide a consistent, transparent, and values-aligned way to assess whether social enterprises are truly delivering inclusive, ethical, and sustainable impact. By applying the **REDI Index** (for religious equity and diversity) and the **Economy of Communion (EoC)** model (for ethical business practices and community reinvestment), the CGF ensures that funding is directed to organisations that align with its mission. These frameworks are supported by **ComGrowAI**, an AI-powered tool that enhances the evaluation process with data-driven insights, helping reduce risk, identify enterprise strengths and weaknesses, and support smarter funding decisions. Together, they protect the fund's integrity while driving measurable, lasting impact.



### FRAMEWORK 1 - REDI INDEX

#### *What Is the REDI Index?*

The **REDI Index** stands for **Religious Equity, Diversity, and Inclusion**. It is a values-based assessment tool developed by the **Religious Freedom & Business Foundation (RFBF)** to evaluate how well an organisation:

- Respects freedom of religion or belief (FoRB)
- Promotes religious inclusion in the workplace
- Engages with interfaith communities ethically and constructively

Unlike typical diversity indices that focus on gender or ethnicity, REDI places **religion and belief** at the centre of the inclusion conversation.

*REDI Index – Key Dimensions*

Dimension	Description
Inclusive Hiring	Does the organisation provide equal opportunity to people of all beliefs—including religious minorities, atheists, and converts?
Workplace Accommodation	Are there policies that support religious expression (e.g., prayer spaces, dress, holidays)?
Leadership Representation	Is there faith diversity within leadership or governance?
Interfaith Engagement	Does the enterprise actively work with or serve diverse religious communities?
Anti-Discrimination Measures	Are there formal protections and reporting mechanisms for religious bias or harassment?
Training and Awareness	Do employees receive education about religious inclusion and FoRB rights?
Public Positioning	Does the organisation publicly support religious freedom and interfaith dignity?



## *How the REDI Index Helps the CGF Achieve Its Purpose*

### 1. Targets the Right Enterprises

The REDI Index allows CGF to identify enterprises that:

- Operate in FoRB-sensitive environments
- Have demonstrable commitment to interfaith inclusion
- Can model peacebuilding through employment

**Why this matters:** Many high-impact faith-rooted organisations are excluded from funding due to lack of formal credentials. REDI creates a bridge between mission and measurable value.

### 2. Builds FoRB-Resilient Economies

By scoring and supporting REDI-compliant enterprises, the CGF:

- Promotes workplace dignity and freedom of belief
- Strengthens enterprise cultures that resist religious intolerance
- Builds “pocket economies” where diversity is not just accepted, but economically advantageous

**Impact:** Reduces community tensions and increases local trust and cooperation.

### 3. Provides an Ethical Investment Standard

Investors increasingly demand **ESG-compliant** (Environmental, Social, Governance) portfolios. REDI:

- Quantifies religious inclusion as part of the “S” in ESG
- Provides due diligence data to de-risk investment in sensitive regions
- Creates a moral and economic rationale for impact investment

**Impact:** Investors can fund REDI-rated organisations with confidence in their ethical and social return.

### 4. Guides Enterprise Development

REDI assessments are not only evaluative—they’re **developmental**. CGF enterprises receive:

- Feedback on how to improve inclusion
- Benchmarks to increase their REDI score
- Access to support and training resources (via RFBF and partners)

**Impact:** Organisations grow in both financial and ethical maturity, meeting global standards and local needs.

## 5. Monitors Long-Term Impact

The REDI Index is used throughout an enterprise's CGF lifecycle to:

- Track improvements in religious inclusion
- Inform bi-monthly reviews and re-evaluation at each funding stage
- Provide KPIs (e.g., percentage of FoRB-affected individuals hired) for external audits and transparency

**Impact:** Ensures that FoRB values are embedded and not just symbolic.

The Index Assesses:

- Inclusive hiring
- Religious expression in the workplace
- Interfaith engagement and anti-discrimination
- Leadership diversity and cultural sensitivity

Evaluation

REDI + EoC = Holistic Evaluation

Together with the Economy of Communion (EoC) model, REDI completes a dual-evaluation framework:

- **REDI:** Measures spiritual and social inclusion
- **EoC:** Measures ethical governance and community reinvestment

This ensures that enterprises are not only effective but equitable—both economically and culturally.

## FRAMEWORK 2 – EOC MODEL (7 MEASURES)

### *What Is the Economy of Communion (EoC)?*

The **Economy of Communion (EoC)** is a business model born from the Focolare Movement and inspired by the teachings of Chiara Lubich. At its heart, the EoC is a vision of the economy where **business is oriented toward the common good**, solidarity, and ethical relationships—not just profit.

In the context of the CGF, EoC provides the **ethical compass** for enterprise selection, growth, and reinvestment. It complements the REDI Index by shifting the internal structure of enterprises to be **people-centred, participatory, and socially just**.

*The 7 Dimensions of the EoC Model (as used by Consulus)*

Measure	What It Evaluates	Example
1. Common Good Goals	Whether the enterprise's mission includes a measurable contribution to societal wellbeing, not just shareholder returns	Profit-sharing with NGOs or employment for the marginalised
2. Capacity for Social Impact	The organisation's ability to generate outcomes that benefit vulnerable communities or address systemic issues	Providing trauma recovery programs or inclusive education
3. Ethical Sourcing	Responsible and values-aligned procurement and supply chain practices	Partnering with suppliers that hire disadvantaged populations
4. Co-Innovation and Dialogue	Participatory decision-making, shared learning, and inclusive leadership	Regular staff circles or collaborative goal-setting
5. Community Reinvestment	Allocation of profits to benefit the community through tangible projects	1/3 of profit mandated by CGF goes to NGO-led initiatives
6. Shared Ownership and Governance	Models that empower staff or communities in ownership and governance decisions	Employee shares, profit participation, or advisory roles
7. Social Project Participation	Engagement with external social projects, such as FoRB education or peacebuilding	Hosting interfaith dialogue or local food security campaigns

*Why EoC Matters to the Common Growth Fund*

1. Promotes Ethical Economic Models in FoRB Contexts

- In FoRB-affected regions, exploitation and inequality often dominate economic structures.
- EoC transforms enterprises into **agents of healing and dignity**, countering exclusion with cooperation.

**Impact:** Converts extractive enterprises into regenerative forces in local economies.

## 2. Mandates Community Reinvestment

- The CGF requires EoC enterprises to reinvest at least one-third of profits into community initiatives.
- This is not charity—it is built into the business model.

**Impact:** Ensures long-term, scalable community impact and builds trust.

## 3. Prepares Enterprises for Value-Aligned Capital

- EoC standards attract **impact investors**, faith-based foundations, and ESG-aligned funds.
- Enterprises with EoC practices demonstrate social ROI and moral legitimacy.

**Impact:** CGF-supported enterprises become **credible investment opportunities** in ethical capital markets.

## 4. Builds Inclusive Cultures Internally

- EoC prioritises **employee participation**, professional growth, and shared mission.
- In many FoRB contexts, this means creating safe workplaces for religious minorities, women, and the poor.

**Impact:** Fosters healthy internal environments where difference is respected and valued.

## 5. Supports Sustainable Scaling

- Rather than scale at all costs, EoC encourages **right-sized growth** that does not sacrifice ethics for expansion.
- Enterprises are coached on how to **grow while staying human-centred**.

**Impact:** Avoids burnout, mission drift, and unethical shortcuts.

The EOC Assesses:

1. Common Good Goals
2. Capacity for Social Impact
3. Ethical Sourcing
4. Co-Innovation and Dialogue
5. Community Reinvestment
6. Shared Ownership
7. Social Project Participation

A Dual Framework Evaluation

EoC + REDI = Full Integrity Model

Together with the REDI Index, EoC ensures:

- Inclusion at the cultural level (REDI)
- Integrity at the operational level (EoC)

This dual-framework allows the CGF to fund only those enterprises that:

- Uplift FoRB in practice
- Build inclusive, community-oriented economic ecosystems
- Deliver measurable impact *and* moral leadership

### EVALUATION TOOL - COMGROWAI

ComGrowAI is the AI-powered platform developed by Consulus to assess social enterprises applying to the Common Growth Fund. It combines data-driven insights with the REDI Index and EoC frameworks to evaluate each organisation's governance, impact, and ethical integrity. Designed for use in FoRB-sensitive contexts, ComGrowAI helps identify high-potential, inclusive enterprises while reducing risk and ensuring transparency. It supports decision-making throughout the CGF's four-stage model, ensuring that funding reaches organisations that align with the fund's values and goals.

AI tool that integrates:

- Governance scoring
- Impact benchmarking
- Fraud detection
- Readiness for investment

Only enterprises meeting minimum REDI + EoC thresholds are funded.

## INVESTMENT AND DUE DILIGENCE PROCESS

Due diligence is conducted at every stage by a panel including:

- FoRB Foundation trustees
- Consulus governance experts
- REDI Index representatives
- Independent and Impartial advisors

Key due diligence elements:

- Legal, financial, and governance vetting
- AI risk analysis and enterprise scoring
- Safeguarding assessment based on UN and UK standards
- Compliance with anti-terrorism and anti-fraud regulations

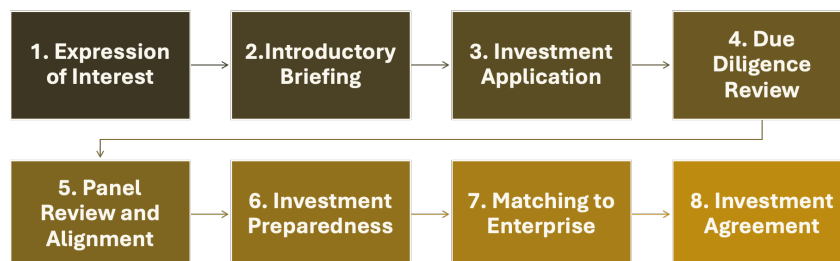
Safeguarding includes:

- Local safeguarding leads
- Culturally adapted policies
- Protection of religious minorities, converts, and women
- Anonymous reporting and crisis response

## ONBOARDING

### INVESTOR

*Onboarding Process for an investor to The Common Growth Fund*



### 1. Expression of Interest

- The investor (individual, foundation, or institution) is introduced to the CGF through a proposal, presentation, or briefing.

- CGF partners (e.g., FoRB Foundation, Consulus) respond with tailored information and investment materials.

## 2. Introductory Briefing

- The investor attends a one-on-one or group **orientation session**.
- Key topics: CGF purpose, four-stage model, REDI/EoC frameworks, risk safeguards, and community impact.

## 3. Investment Application

- Investor completes a simple **Investor Interest Form** indicating:
  - Amount pledged or range
  - Type (grant, loan, equity stake)
  - Preferred impact areas (e.g. education, interfaith business)
  - Risk tolerance and compliance requirements

## 4. Due Diligence Review

- The FoRB Foundation conducts a **due diligence check** on the investor, ensuring:
  - Legitimacy of funding source
  - Compliance with AML/CFT regulations
  - Alignment with CGF ethical standards
- The investor is given a CGF **Due Diligence Pack** outlining:
  - Fund governance
  - Tranche-based release structure
  - Audit and transparency protocols

## 5. Panel Review and Alignment

- The CGF **Investor Panel** (FoRB, Consulus, RFBF, and independent advisors) reviews the investor profile.
- If aligned, the investor is invited to:
  - Join thematic impact briefings or field visits
  - Suggest potential enterprise focus areas (optional)

## 6. Investment Preparedness

- Investor signs a **Letter of Intent (LOI)** confirming:
  - Tentative amount pledged
  - General investment conditions
  - Acknowledgement of CGF governance and release structure

## 7. Matching to Enterprise

- As social impact enterprises progress through Stage 2 or 3, investors are matched based on:

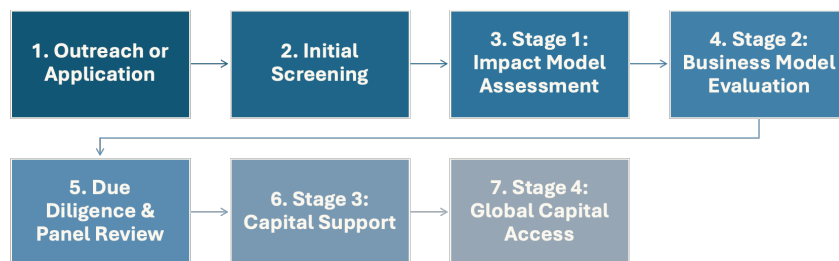
- Sector alignment
- Region
- Risk/return preference

## 8. Investment Agreement

- Once a suitable enterprise is approved:
  - A **formal agreement** is signed
  - Funds are released in stages, with reporting milestones

## SOCIAL IMPACT ORGANISATION

### Onboarding Process for the SIO to The Common Growth Fund



### 1. Outreach or Application

- The organisation is identified through:
  - Referrals from FoRB/CONSULUS/NGO networks
  - Application on CGF website
  - CGF-led calls for proposals
- SIO submits a **Preliminary Interest Form** outlining:
  - Mission and impact area
  - Legal status and structure
  - Existing operations and target communities

### 2. Initial Screening

- Consulus reviews basic eligibility:
  - FoRB-alignment and inclusive hiring
  - Presence in Commonwealth country
  - Basic governance and legal registration
- If eligible, SIO is invited to enter the **Sandbox Track** (Stage 1)

### 3. Stage 1: Impact Model Assessment

- Complete a **mission and impact profile**
- Undergo REDI and EoC preliminary scoring
- Reviewed by the Evaluation Panel to confirm:

- Authentic social mission
  - Alignment with FoRB values
- Outcome: If approved, SIO is formally **admitted to development track**

#### 4. Stage 2: Business Model Evaluation

- Submit full application including:
  - Financials and business plan
  - Governance documents
  - Organisational risk assessment
- ComGrowAI and human reviewers assess:
  - Business viability
  - Leadership, strategy, and operational integrity
- Outcome: Feedback + eligibility for technical support and due diligence prep

#### 5. Due Diligence & Panel Review

- SIO undergoes structured due diligence:
  - REDI and EoC in-depth review
  - Legal and safeguarding compliance check
  - Field or virtual site review
- CGF Panel (FoRB, Consulus, RFBF, independents) reviews final readiness
- If successful, SIO is approved for **Stage 3 funding**

#### 6. Stage 3: Capital Support

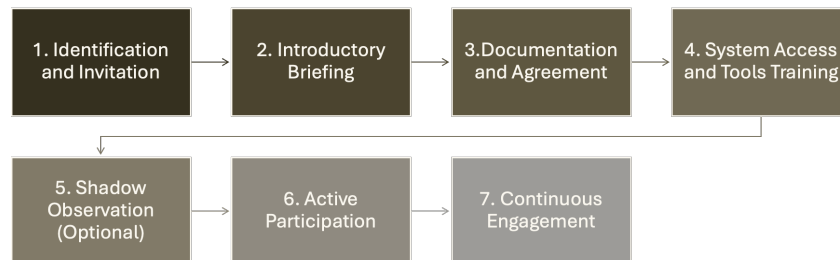
- Loan agreement signed (up to \$1M in tranches)
- SIO receives mentorship, financial coaching, and performance tracking tools
- Milestones monitored bi-monthly
- Performance determines progression to Stage 4

#### 7. Stage 4: Global Capital Access

- High-performing SIOs receive support for larger-scale investment
- Legal and valuation support offered
- Potential for \$20M–\$50M capital access via philanthropic or equity investors

## PANEL MEMBER

### Onboarding Process for a Panel Member to The Common Growth Fund



#### 1. Identification and Invitation

- Potential panel members are identified based on:
  - Expertise in relevant fields (e.g. enterprise development, interfaith dialogue, ethics, safeguarding, investment, law)
  - Alignment with **FoRB values** and CGF's mission
  - Independence and integrity
- Nominated by CGF partners (FoRB Foundation, Consulus, RFBF) or invited directly

#### 2. Introductory Briefing

- Attend a structured **orientation session** covering:
  - CGF's purpose, four-stage enterprise model, and funding structure
  - Evaluation frameworks: **REDI Index** and **EoC model**
  - Role and responsibilities of the panel
  - Governance structure and decision-making protocol

#### 3. Documentation and Agreement

- Receive and review:
  - **Panel Member Handbook**
  - **Code of Conduct and Conflict of Interest Policy**
  - **Safeguarding Policy**
  - **Confidentiality Agreement**
- Sign a **Panel Member Agreement**, confirming:
  - Adherence to CGF values and safeguarding expectations
  - Willingness to commit time for periodic reviews and decisions

#### 4. System Access and Tools Training

- Given secure access to:
  - Evaluation reports and dashboards (e.g. ComGrowAI profiles)

- CGF decision logs, meeting schedules, and case files
- Training on:
  - How to interpret REDI and EoC scoring
  - Due diligence formats and risk frameworks
  - Panel voting and escalation procedures

## 5. Shadow Observation (Optional)

- May attend one panel meeting as a non-voting observer to:
  - Understand decision flow
  - Observe interaction between CGF partners and other panelists

## 6. Active Participation

- Assigned to review cases (e.g. enterprise evaluations, investment approvals)
- Participate in:
  - Monthly or bi-monthly review meetings
  - Ad hoc decisions for urgent matters
  - Annual learning and review sessions

## 7. Continuous Engagement

- Panel members receive:
  - Regular updates on fund performance and impact
  - Invitations to CGF events, enterprise showcases, or interfaith briefings
- Encouraged to provide feedback for continual improvement of evaluation processes

# STANDARDS

## ETHICAL STANDARDS

The **Common Growth Fund (CGF)** operates under a clear set of **ethical standards** designed to uphold dignity, transparency, and inclusion at every level of its operations. Rooted in the principles of **Freedom of Religion or Belief (FoRB)**, the CGF requires all participating enterprises, partners, and investors to commit to non-discrimination, respect for diversity, and the equitable treatment of all stakeholders regardless of faith, belief, or background. Ethical governance, fair labour practices, responsible use of

funds, and safeguarding of vulnerable communities are non-negotiable foundations. Enterprises must align with the **REDI Index** and **Economy of Communion (EoC)** frameworks, ensuring their operations are not only effective but just. These standards also extend to financial transparency, anti-corruption, and conflict of interest policies, with oversight provided by a diverse and impartial panel. The CGF's ethical code is not merely a compliance tool—it is a moral framework that shapes decision-making, investment, and the vision of inclusive economies rooted in justice and human dignity.

## *DUE DILIGENCE*

**Due diligence** in the Common Growth Fund (CGF) is a structured, multi-layered process designed to ensure that all participating enterprises and investors meet the fund's standards of integrity, transparency, and alignment with **Freedom of Religion or Belief (FoRB)** principles. It involves legal, financial, and governance vetting, as well as rigorous assessments using the **REDI Index** for religious inclusion and the **Economy of Communion (EoC)** framework for ethical business practices. Additionally, safeguarding protocols are applied to identify any risks related to vulnerable populations or reputational harm. All findings are reviewed by the CGF's Evaluation Panel, which includes independent and cross-sector experts. This comprehensive due diligence ensures that CGF funds are directed only to organisations and individuals who demonstrate a genuine commitment to social impact, ethical operations, and FoRB-friendly practices.

### *Due Diligence Process – Common Growth Fund*

The CGF applies a **rigorous and multi-dimensional due diligence process** to assess the integrity, legitimacy, and ethical alignment of all participating organisations and investors. This ensures the fund remains compliant with legal standards, FoRB values, and global safeguarding expectations.

#### 1. Pre-Screening (Initial Eligibility Check)

- What happens:
  - Verify basic eligibility: legal registration, Commonwealth presence, FoRB mission relevance
  - Confirm the applicant or investor is not listed on international watchlists (e.g., UN sanctions, OFAC)
- Purpose:
  - Filter out high-risk or incompatible applicants early

#### 2. Legal and Financial Vetting

- What happens:
  - Confirm valid incorporation, board structure, and beneficial ownership
  - Review audited financial statements, banking records, and funding sources
  - Conduct anti-money laundering (AML) checks
  - Apply screening for:
    - Links to terrorist organisations
    - Drug trafficking networks
    - Organised crime or corrupt practices
    - Fraudulent charitable registrations or shell entities
- Purpose:
  - Ensure all capital and entities involved are lawful, traceable, and compliant with international financial regulations

### 3. REDI and EoC Evaluation

- What happens:
  - Use the **REDI Index** to assess religious inclusion, workplace dignity, and non-discrimination
  - Apply the **EoC 7-measure model** to evaluate ethics, transparency, and community reinvestment
  - Analyse responses through **ComGrowAI** for risk flags or inconsistencies
- Purpose:
  - Confirm that the enterprise/investor reflects CGF's moral and social mission

### 4. Safeguarding and Reputational Risk Review

- What happens:
  - Evaluate safeguarding policies for children, vulnerable groups, whistleblowers
  - Conduct public and media background checks for past abuse, exploitation, or hate activity
  - Assess alignment with UN FoRB and Human Rights standards
- Purpose:
  - Protect communities, partners, and the CGF's reputation

### 5. Criminal and Compliance Risk Screening

- What happens:
  - Use national and international intelligence sources to:
  - Cross-reference criminal affiliations
  - Identify money laundering patterns
  - Flag associations with extremist or militant networks

- Expose prior convictions or investigations for corruption or smuggling
- Purpose:
  - Enforce zero tolerance for criminal involvement or ethical misconduct

## 6. Field Verification or Desk Review

- What happens:
  - Conduct virtual or on-site reviews to validate operational claims
  - Interview leadership about governance, ethics, and FoRB sensitivity
  - Verify NGO or community partnerships in practice
- Purpose:
  - Ensure operational reality aligns with stated commitments

## 7. Evaluation Panel Decision

- What happens:
  - Present findings to a cross-partner Evaluation Panel (FoRB Foundation, Consulus, RFBF, external experts)
  - Panel votes to approve, conditionally accept, defer, or reject
- Purpose:
  - Safeguard the fund through shared ethical oversight

## 8. Documentation and Compliance Confirmation

- What happens:
  - Final decision is documented and signed off
  - If approved:
    - Formal agreement issued
    - Tranche-based funding or staged investment begins
    - Monitoring plan activated
- Purpose:
  - Maintain audit trail, legal compliance, and fund accountability

## Red Flags for Immediate Rejection

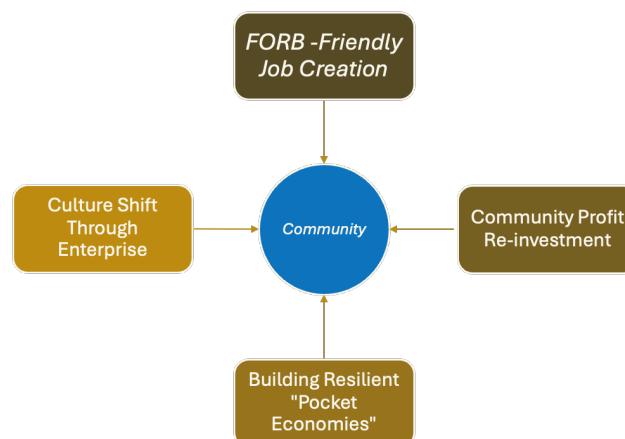
- Links to proscribed terrorist groups (e.g. as defined by the UN, UK Home Office, or US State Department)
- Use of unregulated or anonymous financial channels
- Any evidence of money laundering, trafficking, or extremist financing
- Active investigations or sanctions for fraud, hate crimes, or exploitation
- Involvement in religious coercion, incitement, or discriminatory hiring

## SAFEGUARDING

**Safeguarding** within the Common Growth Fund (CGF) is a foundational principle that ensures the protection of all individuals—especially vulnerable groups—who may be affected by the fund’s activities. Rooted in human dignity and Freedom of Religion or Belief (FoRB), CGF safeguarding extends beyond basic compliance to include cultural sensitivity, community accountability, and proactive risk management. All partner organisations, social enterprises, and associated NGOs must have clear safeguarding policies, mechanisms for reporting abuse or misconduct, and trained personnel to handle disclosures appropriately. Particular attention is given to protecting religious minorities, women, children, and individuals at risk of persecution or exclusion. Safeguarding is integrated into the due diligence process, monitored throughout all funding stages, and overseen by a panel committed to upholding the highest ethical and humanitarian standards.

## IMPACT ON COMMUNITIES

The impact on communities is at the heart of the Common Growth Fund’s mission. By supporting inclusive, FoRB-aligned enterprises, the CGF aims to create lasting social and economic change at the local level—particularly in regions affected by religious discrimination and exclusion. Through job creation, profit reinvestment into community-led projects, and the promotion of interfaith cooperation, the CGF fosters resilient, values-driven “pocket economies” that empower individuals across belief systems. This model ensures that funding not only grows ethical businesses but also transforms the communities they serve.



## FORB-FRIENDLY JOB CREATION

- Inclusive hiring standards ensure access for all beliefs
- Interfaith workplaces build mutual respect

- Targeting regions with FoRB-related exclusion

### COMMUNITY PROFIT REINVESTMENT

- One-third of profits must fund NGO-led local projects
- Projects include trauma counselling, education, women's empowerment
- Matching funds from global companies (e.g., Salesforce, Microsoft)

### BUILDING RESILIENT "POCKET ECONOMIES"

- Funds go to locally embedded enterprises
- Supports local sourcing and reinvestment
- Reduces reliance on aid and increases economic sovereignty

### CULTURE SHIFT THROUGH ENTERPRISE

- EoC promotes ethical leadership and co-ownership
- REDI embeds FoRB into economic frameworks
- Community and enterprise values align

## TIMELINE AND MILESTONES

Phase	Milestone
Q2 2025	Launch in Rome
Q3 2025	Begin enterprise sandbox evaluations
2026–2028	Scale-up and support across Commonwealth
2029	Enterprises access global capital markets