




A framework for qualifying “refugee investments”

For the purposes of this investor framework, the term “refugee” refers to an inclusive group of people who are externally or internally forcibly displaced, whether through armed or political conflict, ethnic tension, systematic discrimination, climate change or natural disaster, or the displacement of indigenous communities.

An investment must meet the criteria of at least one of the following categories to be included as a Refugee Investment:

Refugee-OWNED: Enterprise is at least:		A. 51% Refugee-Owned; OR B. 20% Refugee-Owned and have at least one refugee listed as a “key person” in operating documents.
Refugee-LED: Enterprise has:		A. At least one refugee in senior management (e.g., CEO, CFO or COO); OR B. A board with at least 33% refugee representation.
Refugee-SUPPORTING:		A project that provides or has the potential to provide a good or service that supports humanitarian efforts; or, an enterprise or investment that intentionally supports refugees through the development of infrastructure and services that buttress stability in disproportionately large displacement hosting cities/communities by providing infrastructure, jobs (a commitment of at least 20% of workforce), ³¹ skills, products, or services to refugees that demonstrably improve the quality of refugee self-reliance, resiliency, health, education, or inclusion in financial markets. ³²

Projects can also qualify as...

Refugee-SUPPORTING, Host-weighted:		If they support host community businesses and the sponsor commits to adopt a policy to source at least 10% of all sub-contracting for the project from refugee-owned businesses. Deals must demonstrate either a minimum current percentage of refugee jobs or a commitment to increase their hiring within a reasonable timeframe to that level.
A Refugee LENDING FACILITY:		A debt instrument will be considered a Refugee Investment if refugee-owned/-led enterprises, refugee-supporting enterprises, or refugee borrowers will be the recipients of at least 25% of the loan proceeds.
Refugee FUNDS:		Private, alternative investment vehicles (e.g., private equity, venture capital, or portfolio structures deploying debt and/or equity) with investment strategies such as late-stage venture, growth equity, or expansion financing that have: A. A fund manager or general partner that is at least 20% Refugee-Owned or controlled; or B. Portfolio companies that are Refugee-Owned, Refugee-Led, or Refugee-Supporting (each term as described above) making up at least 33% of the vehicle’s portfolio.

ALL Refugee Investments must take refugee protections into account including across the supply chain, identity protection, and other exploitative practices including working conditions. The above thresholds should not be absolute, and should not exclude Refugee Investments that have the potential to create sustainable or catalytic opportunities.

The following does NOT qualify a project as a Refugee Investment:

REFUGEE-LED ENTERPRISE THAT FAILS TO POSITIVELY IMPACT REFUGEES: An enterprise, regardless of refugee ownership or leadership, that is geographically based outside a zone of high-refugee concentration, e.g. OECD country, and, does not have evidence of improving refugee lives through job creation, economic development, social integration, education, health, or self-reliance.

COMMUNITY BENEFITS (CORPORATE SOCIAL RESPONSIBILITY PROGRAMS): All projects should consider and consult with refugees and their hosts when assessing or seeking to enhance community benefits. For example, community benefits that provide intentional, additional economic opportunity for refugees (educational, vocational, time-saving, etc.) are always encouraged. While community benefits/CSR programs are not deemed sustainable over time, and therefore will not be deemed a Refugee Investment, including refugees in community benefit program design is extremely important to ensure overall program effectiveness.