



MODERN SLAVERY STATEMENT

1. C40 Structure and Supply Chains

C40 is a network of mayors of the world's leading cities that are united in action to confront the climate crisis. C40 mayors are committed to using an inclusive approach to cut emissions in half by 2030, help the world limit global heating to 1.5°C, and build healthy, equitable and resilient communities. Our zero-tolerance approach to modern slavery and human trafficking forms part of this mission.

This applies to all our entities, including C40 Cities Climate Leadership Group Inc., C40 UK, C40 South Africa, C40 Denmark, C40 India and C40's Beijing and Brussels Representative Offices ("C40") with the support of our leadership, including C40's Co-Chairs, the Steering Committee, and the Board of Directors. Modern slavery is owned as a key risk area by the Legal Team. C40 Legal forms part of our Corporate Services Department, reporting to the Managing Director of Corporate Services.

C40 is committed to acting ethically and acting to prevent and tackle modern slavery and human trafficking throughout the organisation as well as in our supply chain and partner organisations. We use suppliers and consultants to support the cities within our network as well as the operations of our organisation in the UK and internationally. The key areas in which we engage suppliers include:

- Professional consulting and project management.
- Translation & interpretation services;
- Media, communications, and other events support;
- Travel, hospitality, food and beverage;
- IT equipment, accessories, software and consulting services;
- Human resources such as benefits, training, recruitment, and payroll services;
- Professional services such as audit, legal and tax consulting.

2. Policies Relating to Slavery and Human Trafficking

C40 is committed to the highest standards of ethical behaviour and conducts all operations in a proper, fair, impartial, and ethical manner. C40 and its employees

worldwide, are committed to acting in full compliance with all applicable laws and regulations in countries where C40 operates. We have implemented measures to make sure C40 employees and third parties alike observe and maintain high standards of ethical conduct in their relationships with fellow staff, clients, suppliers, employees, subcontractors, communities, volunteers, beneficiaries, grantees, and supply chains, wherever they work.

We are prepared to take action against anyone who may refuse to comply with these standards and have implemented the following policies and processes in line with our zero-tolerance approach to modern slavery and human trafficking:

- **Code of Conduct**, providing an overarching policy on ethical behaviour for C40 staff, including the process and steps taken around whistleblowing;
- **Non-Staff Code of Conduct**, requiring suppliers, grantees, and other partners organisations to commit to a set of ethical standards during their work with C40, including labour and human rights;
- **Safeguarding and Welfare Policy** and a **Safeguarding Manual of Practice** prescribing measures for the safety and protection of all beneficiaries;
- **Grievance Policy**, for dealing with staff concerns or complaints regarding their work, working relationships or the working environment;
- **Complaints Procedure**, providing guidance for external parties on how and where to deliver complaints;
- **Donations Acceptance Policy**, prescribing a due diligence process for screening potential funders and whether they uphold decent work conditions;
- **Wellbeing and Health at Work Policy and Practice**, and a **Wellbeing Framework**, providing a results-oriented, inclusive, and comprehensive framework for an open and supportive practice for promoting staff health and wellbeing, including the goals that C40 is committed to meeting;
- **Equity, Diversity, and Inclusion Policy**, including an **Action Plan** and a **Diversity on Panels** policy, outlining C40's commitment to embracing equity and tackling discrimination in all its forms;
- **Equal Opportunity Policy**, demonstrating how C40 aims to promote an environment that is free from all forms of unlawful or unfair discrimination, and values the diversity of all people
- **Events Code of Conduct**, prescribing behaviour in line with C40's expectations;
- **Contracting and Procurement Manual**, encouraging staff to consider equity and ethical alignment on all procurement exercises.

3. Due Diligence, Risk Assessment & Management

We adopt a risk-based approach to organisations we engage with, including suppliers, grantees, and other partner organisations. Given the nature of our work, we consider the risk of modern slavery occurring in our operations to be low. The

profile of our workforce is entirely professional, office-based roles and the majority of our suppliers are also professional services.

As such, C40 conducts reasonable due diligence on our partners, based on the nature of the relationship or transaction. This includes:

- Using a sanctions screening software to screen all new suppliers, funders, grantees and other organisations we partner with;
- Requiring suppliers, grantees, and other partners to accept a [Non-Staff Code of Conduct](#) and commit to upholding labour and human rights in line with the International Bill of Human Rights, as well as decent work conditions of freedom, equity, security and human dignity in line with the standards of the International Labour Organisation;
- Conducting research on potential funders and whether they uphold decent work conditions;
- Offering a third-party external line that staff can use to confidentially raise concerns about serious misconduct at C40 including safeguarding, security, and health & safety.

We regard the key risk of C40 operations coming into contact with modern slavery to be where we engage with the hospitality industry, e.g. catering services at our events. This is largely mitigated by staff assessing the venue or by receiving recommendations from our city government partners. Staff are also expected to spot the signs of modern slavery and report anything that concerns them as soon as possible.

4. Measuring Our Effectiveness & Training Our Staff

C40 continually reviews our policies and procedures to ensure that we are equipped to identify and address ethical challenges to our mission. In 2023, we adopted a new Staff Code of Conduct and Non-Staff Code of Conduct. In 2024, we will also aim to adopt an Events and Entertainment Expense Policy and a Fixed Asset Handbook for staff, as well as update our Safeguarding Policy.

We aim to act transparently and disclose information about any modern slavery risks we have identified, as well as the actions we take in response to them. We have established a Diversity, Inclusion, and Anti-Racism Committee and a Staff Consultation Forum to oversee C40's work on diversity, inclusion, and anti-racism.

C40 continually improves its staff training on ethical issues. In 2023, we offered staff training on ethical behaviour, including whistleblowing, safeguarding, and modern slavery. We will continue to upgrade our training programme as needed to adequately capture modern slavery risks arising from our operations.

Juliette Carter

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C40 Cities