

**C40 Cities Climate Leadership Group Inc.
Partnership on GEF Sustainable Cities - C40
(P514852)**

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

June 3, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. C40 Cities Climate Leadership Group Inc. (C40) (the Recipient) will implement the Partnership on GEF Sustainable Cities - C40 Program (the Project) as set out in the Grant Agreement (the Agreement). The International Bank for Reconstruction (the Bank), acting as administrator of grant funds provided by the Global Environment Facility ("Donor"), has agreed to provide financing for the Project, as set out in the Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient's Representative specified in the Agreement. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Implementation Unit (PIU) within C40 with staff to support management of environmental, social, health and safety risks and impacts of the Project.</p>	No later than one month after the Project Effective Date throughout project implementation.	C40
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Share relevant policies and documentation with the PIU staff, consultants and relevant project stakeholders on the ESCP, particularly on stakeholder engagement, labor management, and grievance mechanisms.</p>	From the Effective Date and throughout project implementation	C40
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Summary of stakeholder engagement activities carried out as set out in the ESS10 section below. • Complaints submitted to the grievance mechanisms, the grievance log, and progress made in resolving them. • Number and status of resolution of incidents and accidents reported under action E below. 	Submit semi-annual report to the Bank throughout Project implementation, commencing after the Effective Date.	C40
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to built cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out</p>	<p>Notify the Bank no later than 48 hours after learning about the incident or accident. Provide available details upon request.</p> <p>Provide a review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	C40

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	the measures and actions to be taken to address the incident or accident and prevent its recurrence.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS Adhere to the measures and actions set out in ESS1, ESS2, and ESS10 sections below.</p>	Throughout Project implementation	C40
1.2	<p>USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK Ensure that the E&S risks and impacts of the Project are managed in accordance with this ESCP and the Recipient E&S Framework, which includes, inter alia, the following C40 policies and guidelines:</p> <ul style="list-style-type: none"> ● Code of Conduct for External Workers 2023:2023-Non-Staff-Code-of-Conduct-0124 (1).pdf ● Wellbeing and Health at work policy 2020:Wellbeing and Health at Work Policy.pdf ● Travel policy 2026: Travel Requirements and Guidance .pdf ● Environmental policy 2019 C40 Environmental Policy Internal Aug2019.pdf ● Safeguarding policy 20242024 Global Safeguarding Policy Final (1).pdf <p>Promptly notify the Bank of any changes to Recipient's E&S Framework that may materially adversely affect Recipient's ability to manage the E&S risks and impacts of the Project in line with the ESSs, and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Bank, such changes adversely affect relevant ESHS risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Bank. The ESCP shall be updated to reflect such agreed actions.</p>	Throughout Project implementation Notify the Bank immediately after taking notice of the change to the Recipient's E&S Framework. Subsequent actions, if requested by the Bank, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.	C40
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES Ensure that Project workers (C40 staff and consultants) are engaged in the implementation of Project activities consistent with ESS2 and relevant C40 policies as mentioned above on 1.2. To this end, ensure that the following measures are carried out:</p> <p>a) Provide workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable;</p>	Throughout Project implementation	C40

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	<p>b) Where face-to-face interactions are planned, C40/PIU will follow relevant technical advisory on Occupational Health and Safety in the context of events and guidelines issued by the Government of the Country the office operating is situated in and governments of any beneficiary countries where these face to face interactions take place.</p> <p>c) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress mechanisms without fear of retaliation; and effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions.</p> <p>d) Provide C40's code of conduct for workers, which shall include measures to prevent and respond to SEA and SH cases.</p>		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>While the policy is not relevant. Potential project beneficiaries could include members from indigenous groups, Sub-Saharan African Historically Underserved Traditional Local Communities and/or institutions such as NGOs or thinktanks who may work and represent their interests. Therefore, the project will give special considerations in their program design and information dissemination on the engagement of the Project activities to facilitate their participation in the training programs.</p>	Throughout Project implementation	C40
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT</p> <p>implement stakeholder engagement and information disclosure measures in the implementation of the Project activities, in a manner consistent with ESS10. To this end, ensure that the following measures are implemented:</p> <p>a) Provide stakeholders with information about the environmental and social risks and impacts of the Project activities in a timely, understandable, accessible and appropriate manner;</p> <p>b) Consult stakeholders in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, including with regards to any environmental and social measures to be carried out as part of the Project activities; and</p>	Throughout Project implementation	C40

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	c) Document the stakeholder engagement activities, including: description of consultations, and records of meetings held; feedback received; and measures to engage stakeholders who may be disadvantaged or vulnerable.		
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>C40's complaint mechanism can be found here: https://www.c40.org/location-and-policies/complaints-procedure.</p>	Maintain the grievance mechanism existing on the project website and maintain it throughout project implementation.	C40