

# C40 Cities Non-Staff Code of Conduct

## 1. Policy Statement

- 1.1. C40 will only work with suppliers, grantees, and other partners ('third parties') that observe high standards of ethical behavior.
- 1.2. In addition to complying with all applicable local laws and regulations, third parties agree to the standards set out in this Code of Conduct during their association with C40.
- 1.3. Third parties will ensure that their employees, subcontractors, and volunteers understand and commit to these standards before doing any work for C40.
- 1.4. Breaching this Code of Conduct is grounds for immediate termination of contract.
- 1.5. Third parties must immediately notify C40 at [ethics@c40.org](mailto:ethics@c40.org) in case of a breach of this Code or any conflict between the Code and applicable local laws.

## 2. Labor and Human Rights

- 2.1. All third parties commit to upholding labor and human rights to an international standard in line with the [International Bill of Human Rights](#).
- 2.2. Third parties commit to upholding decent work conditions of freedom, equity, security and human dignity in line with the standards of the [International Labour Organization](#) (ILO).
- 2.3. In particular, third parties agree to respect the following ILO standards:
  - The elimination of all forms of forced or compulsory labor;
  - The effective abolition of child labor;
  - The elimination of discrimination in respect of employment and occupation;
  - A safe and healthy working environment.
- 2.4. Third parties agree to take reasonable steps to ensure that these standards are observed in their supply chains.

## 3. Safeguarding

- 3.1. 'Safeguarding' refers to the steps taken to protect from harm anyone who comes into contact with C40 third parties, including but not limited to Staff, volunteers, and in particular children and vulnerable adults.
- 3.2. Examples of safeguarding practices include but are not limited to:
  - Never physically hitting, assaulting or abusing another person, nor abusing them using any other means;
  - Never buying sex or providing anything else of value, including employment, goods or services in exchange for sex;
  - Not being in physical contact with any person in a way that makes them feel uncomfortable;
  - Refraining from using language or behavior that may be considered offensive, inappropriate or sexually provocative.
- 3.3. Third parties confirm they have appropriate safeguarding policies, protocols and practices to ensure the protection of people who may be impacted. If third parties do not have their own policies, they agree to comply with C40's [Safeguarding Policy](#) to the extent applicable.
- 3.4. Third parties will make sure to adequately investigate all safeguarding incidents and, whenever necessary, to take remedial action.
- 3.5. Third parties commit to ensuring their employees, contractors, and volunteers are aware of potential safeguarding risks, and to managing these appropriately.
- 3.6. Third parties agree to exercise reasonable due diligence in ensuring they do not engage with anyone who fails to observe adequate safeguarding practices.

3.7. Further guidance can be found in C40's [Safeguarding Policy](#).

## 4. Anti-Fraud and Anti-Bribery

4.1. Third parties agree to never engage in fraud, i.e. any form of acting in a dishonest way to gain an advantage or cause a loss to another.

4.2. Third parties agree to never engage in bribery, i.e. offering or receiving a financial incentive or anything else of value in an attempt to gain an improper advantage or influence.

## 5. Sanctions, Aid Diversion, and Money Laundering

5.1. Third parties agree to comply with all applicable sanctions rules, particularly those imposed by the United Nations, United States, European Union and/or United Kingdom.

5.2. Third parties agree to never engage in money laundering or terrorist financing, and must not have any dealings with individuals or entities appearing on any designated terrorist lists by a relevant competent authority and/or government.

## 6. Privacy

6.1. When dealing with personal data, third parties are expected to comply with any applicable data protection legislation and protect the reasonable privacy expectations of individuals.

## 7. Environmental Commitment and Equity, Diversity, & Inclusion

7.1. Third parties are expected to protect the natural environment and should continuously improve their operations accordingly, in line with evolving industry standards and sustainability best practices.

7.2. Where applicable, third parties commit to minimizing the adverse effects of their manufacturing operations on the environment and public health and safety.

7.3. Third parties note C40's commitment to Equity, Diversity, and Inclusion (ED&I) and acknowledge C40's [ED&I Statement](#).

## 8. Disclosure and Complaints

8.1. Third parties agree to inform C40 as soon as possible if they are under criminal investigation or charged or convicted of a criminal act.

8.2. Third parties agree to disclose any fraud, safeguarding or other significant issues that may impact their reputation or their relationship with C40.

8.3. If there is anything else relating to ethical behavior that you wish to disclose, or if you are unhappy about any aspect of your engagement with C40, please inform your usual C40 point of contact.

8.4. If this does not resolve your complaint, please contact the Legal Team at [complaints@c40.org](mailto:complaints@c40.org)

8.5. The Legal Team will review the complaint in line with our [Complaints Procedure](#) and will communicate the outcome within a reasonable time – normally within 20 working days of the complaint being received.