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Sustainable Sourcing Strategy Summary



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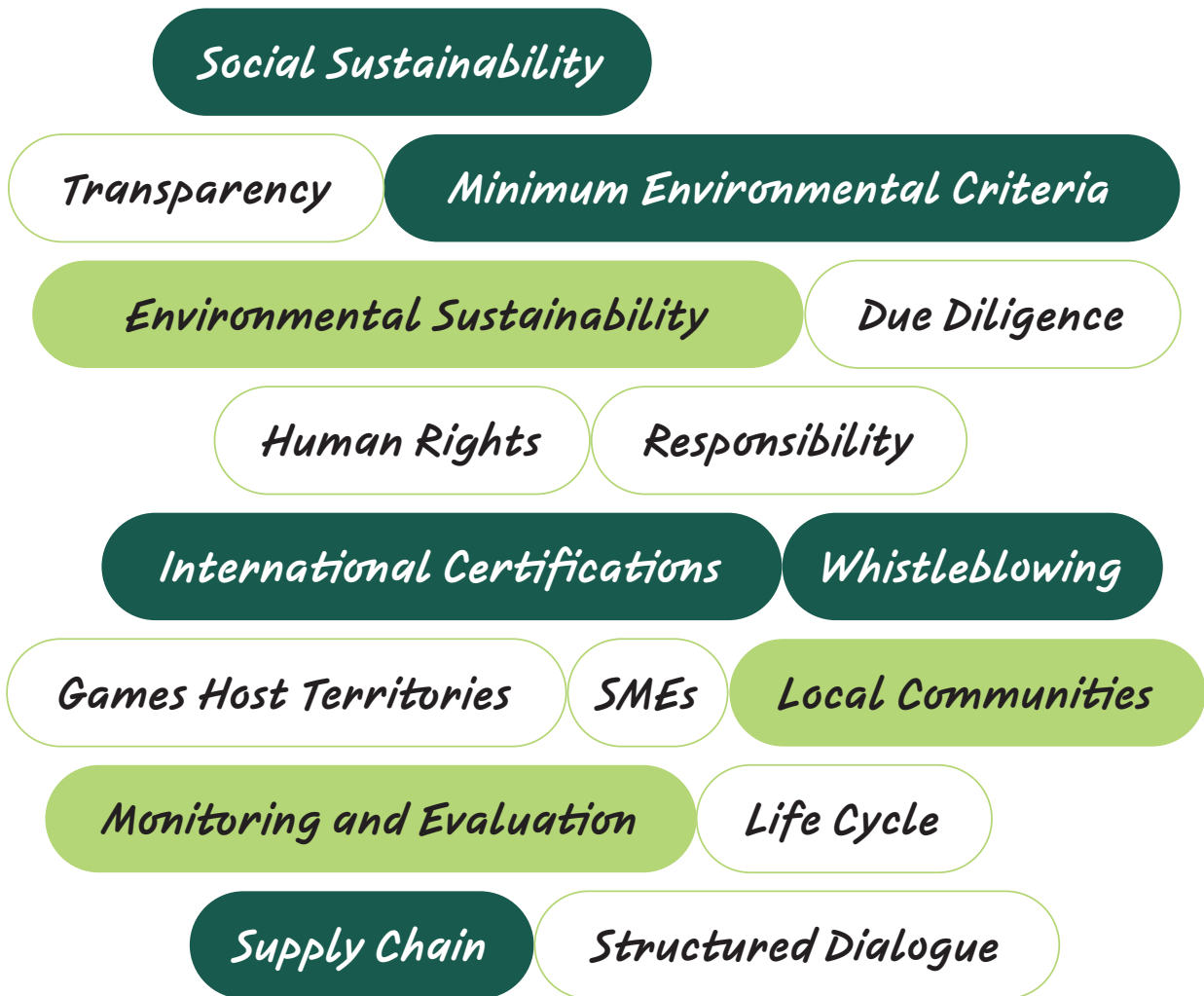
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1. The Sustainable Sourcing Strategy

This Sustainable Sourcing Strategy constitutes the **framework for all sourcing of goods and services through suppliers, Licensees, Partners and national Sponsors** of Fondazione Milano Cortina 2026 (the “economic operators”), who are invited to incorporate environmental, governance, social criteria and respect for human rights in the processes that make up their value chains.

This Strategy is modelled on the principles of sustainability and accountability endorsed by the International Olympic Committee (IOC), the United Nations and leading international and national bodies, and pursues significant environmental and social goals. The mission of Fondazione Milano Cortina 2026 is to make the Olympic and Paralympic Winter Games economically, environmentally and socially sustainable, creating a legacy for future generations, in line with the IOC Agenda 2020 and the IOC’s New Norm.

Sourcing is one of the key documents for achieving this mission: choices that are made regarding these processes can have a significant impact on the social, environmental and economic performance of the event as a whole.

Specifically, by applying this Strategy and its related procedures, Fondazione Milano Cortina 2026 seeks to:

- **improve the environmental performance of the Games as a whole, adopting principles of reduced environmental impact (reduced consumption, waste, emissions and discharges and a reduced impact on biodiversity);**
- **improve the social performance of the Games as a whole, respecting human and worker rights throughout the entire value chain and promoting corporate social responsibility at all levels;**
- **support innovation and the market for products and services with low environmental impact and high social value;**
- **prevent and reduce the main operational and reputational risks;**
- **promote SMEs and social enterprises for the creation of long-term benefits for the hosting communities.**

SUSTAINABLE DEVELOPMENT GOALS



Pursuing environmental sustainability and respect for human rights, as well as sharing social value at every stage of the value chain, is one of the most significant opportunities for Fondazione Milano Cortina 2026 to contribute to the UN’s Sustainable Development Goals.

2. Guiding Documents

The Sustainable Sourcing Strategy is inspired by the principles promoted by the most important international initiatives on sustainability:

- the **UN 2030 Agenda for Sustainable Development**;
- the **UN Guiding Principles on Business and Human Rights**;
- the **OECD Due Diligence Guidance for Responsible Business Conduct**;
- the **fundamental conventions of the International Labour Organization (ILO)**;
- the **Ten Principles of the UN Global Compact**;
- the **12 Level 1 indicators** for sustainable procurement of the **United Nations Global Marketplace**;
- the **Olympic Games Guide on Sustainable Sourcing**.

The principles and standards of the Olympic and Paralympic Movements on sustainability are also referred to in other official documents, such as the **Olympic Charter**, the **Code of Ethics of the International Olympic Committee**, the **Code of Ethics of the International Paralympic Committee**, as well as the **Olympic Host Contract**.

Furthermore, this Sustainable Sourcing Strategy promotes the consistency of Games procurement with the most relevant **European initiatives**:

- the **European Green Deal**¹;
- the **European Pillar of Social Rights**;
- the future EU Corporate Sustainability Due Diligence Directive;
- the Italian Recovery and Resilience Plan for public procurement provided for in the European Regulation 241/2021 (Establishment Facility for Recovery and Resilience).

Other important references are Italian initiatives on sustainable procurement for government authorities, or Green Public Procurement (GPP), which the Milano Cortina 2026 Candidature File refers to:

- the **National GPP Action Plan**²;
- the **National Business and Human Rights Plan 2021–2026**.

Please note that Fondazione Milano Cortina 2026 is a private entity. As such, it is not required to follow European and national laws governing public procurement – however, these are used as a framework to establish its strategy and objectives with regards to sustainable procurement.

Further details on the above guiding documents can be found in the annex.

¹ European Commission Communication No. 640 of 11 December 2019

² Decree of 3 August 2023 (Official Gazette of the Italian Republic No. 193 of 19 August 2023)



3. General Principles

Article 3.5 of Fondazione Milano Cortina 2026's Articles of Association outlines its commitment to:

- prohibiting any form of discrimination, respecting and promoting the principles of diversity, inclusion and gender equality;
- protecting human rights and ensure necessary action against any violation, in accordance with national and international law and in line with the United Nations Guiding Principles on Business and Human Rights;
- refraining from any form of fraud and corruption, as provided for by national and international law;
- promoting and operate according to international good governance standards, particularly those of transparency and accountability, while respecting gender equality.

Furthermore, Article 5 ("Sustainability and Legacy") of the Code of Ethics of Fondazione Milano Cortina 2026 of 21 July 2020 incorporates the principles set out in Article 3 of its Charter, as well as including respect for the principles of sustainability and the environment.

BELOW ARE THE GENERAL PRINCIPLES THAT GOVERN THE ENTIRE PROCUREMENT PROCESS:

1. SUSTAINABILITY

The goods and services procured must not compromise environmental, social and economic sustainability; in other words they must be designed, manufactured, used and disposed of without affecting the environmental, social and economic conditions of future generations.

2. RESPONSIBILITY

The procurement process implemented at every stage of the supply chain must be as consistent as possible with the principle of sustainability set out above. Fondazione Milano Cortina 2026 and the operators must share the same responsibility to respect people and the planet, and monitor the application of the principles set out in this Strategy at every stage of the value chain of the Games. Moreover, Fondazione Milano Cortina 2026 and the operators must ensure appropriate channels to report violations of this Strategy and to support prompt remedies to affected individuals and/or communities.

3. LIFE CYCLE APPROACH

The principles of sustainability and responsibility apply throughout the life cycle of products and services, from the procurement of raw materials to the final destination of products and materials. The approach is to implement the logic of the least possible environmental impact (in terms of consumption of natural and energy resources, production of waste, emissions and discharges, protection of biodiversity) and the production of social benefits for all concerned. This means that all suppliers and sub-suppliers, national Partners, Sponsors and Licensees, as well as others who participate in various ways in the value chain of purchased goods and services, are involved in the implementation of this Strategy. It also means that procurement for the Olympic and Paralympic Winter Games 2026 is intended as a legacy for both the host territories and communities, as well as for future generations.



DEFINITIONS

Environmental Sustainability

Lower environmental impact in terms of reduced consumption of natural resources and energy, reduced waste production, reduced discharges to water and soil and emission of air pollutants, protection of biodiversity, across the whole life cycle of a good/service (short, medium and long term).

Social Sustainability

Protection and promotion of living and working conditions that guarantee dignity, freedom, security, equality and well-being to all those who are affected by the production/implementation of a good/service (workers, local communities, customers, etc.), across its whole life cycle (short, medium and long term).

Economic Sustainability

Production of wealth in the value chain, ensuring fair remuneration to all the people and entities that contribute to its production/implementation of a good/service, across its whole life cycle (short, medium and long term). This covers considerations of the “non-explicit” costs of an asset, e.g. energy consumption in its use stage, maintenance and disposal at the end of its life cycle.

4. Application Tools

Fondazione Milano Cortina 2026 adopts a diversified set of tools connected to sustainability in its sourcing processes:

TOOL	USE
ANALYSIS OF SUSTAINABILITY RISKS IN SUPPLY CHAINS	Identify the product categories, countries and supply chains most at risk, and select suitable sustainability criteria for each category.
RESOURCE MANAGEMENT PLAN	Align the whole sourcing process with the principles of reduction and containment, reuse and upcycling, and recycling of end-of-life goods.
PROCUREMENT PROCEDURE	Identify methods and responsibilities for the sourcing process, including the identification and application of sustainability criteria for the various procedures. Identify specific minimum and awarding environmental and social criteria to be implemented case by case.
OBJECTIVES FOR THE PROCUREMENT OF GOODS AND SERVICES	Identify specific objectives and targets, that can be periodically updated, for the most common goods and services.
HUMAN RIGHTS DUE DILIGENCE/ STRUCTURED DIALOGUE WITH REPORTING SYSTEM	Involve businesses and external stakeholders in the management of human rights issues in high-risk supply chains.
DIALOGUE WITH BUSINESSES/ PARTICIPATION OF SMEs AND SOCIAL ENTERPRISES	Promote the dialogue with economic operators in order to boost understanding of sustainability criteria and encourage the best price for quality balance, as well as stimulate the market to improve the environmental and social performance of products and services. Adopt the proportionality principle – referring to the legislation framework – which entails ensuring that requirements are appropriate, reasonable and commensurate to the pursued objectives.
MONITORING AND REPORTING	Verify the proper implementation of the sustainability strategy in sourcing processes and promote a culture of proportional, efficient, effective and sustainable management of sport events. Tasks to be carried out constantly annual reporting.

4.1 IDENTIFICATION OF SUSTAINABILITY CRITERIA

The sustainability criteria to be applied in sourcing processes, for supplies purchased from or provided by national Partners and Sponsors or even licensed products, concern:

- a. environmental criteria relating to the characteristics of goods and services;
- b. social criteria relating to supply chains for sourcing goods and services;
- c. working conditions and rights of employees based on the collective bargaining agreement (CCNL);
- d. the environmental and/or social qualification of economic operators.

The inclusion of sustainability criteria will help the selection process, which is aimed at reducing environmental impact, protecting health as well as social and human rights at every stage of the supply chain.

- a. A wide range of **environmental sustainability criteria** for sourcing goods and services is taken into consideration.

1. MINIMUM ENVIRONMENTAL CRITERIA

Article 34 of the Public Procurement Code³ makes it compulsory for public sector entities to adopt Minimum Environmental Criteria (MECs), defined by the Minister of the Environment and Energy Security, on technical specifications and contractual clauses.

2. COMMON EUROPEAN CRITERIA

The Common European Criteria (CEC) are developed by the European Union for a range of products and services, the categories of which are reviewed and updated on a regular basis. The criteria are designed to be added directly to procurement documents and include information on verification methods. They are available in all official languages of the European Union.

3. CRITERIA DERIVED FROM THE EU ECOLABEL SCHEME

The EU Ecolabel scheme⁴, identifies products and services that guarantee high performance standards and are characterised by a reduced environmental impact. It is an optional ecolabel based on a system of selective criteria that takes into account the environmental impact of products or services throughout their life cycle (Life Cycle Assessment, LCA).

4. CRITERIA DERIVED FROM NATIONAL ECOLABELS

Where no other criteria are available, reference may be made to environmental requirements set out by national ecolabels, such as Nordic Swan, Blue Angel, Umweltzeichen, Milieuiker, Environmental Choice or similar.

5. CRITERIA FROM PRIVATE ECOLABELS

These requirements are set out in ecolabels that are not issued by public authorities, such as FSC or PEFC for products (paper, furniture, etc.) that use wood from sustainably managed forests; Standard 100 by OEKO-TEX® or the Global Organic Textile Standard for textiles; Cradle to Cradle® or Remade in Italy for circular economy; Life Green Fest criteria for cultural activities; specific sustainability protocols such as LEED, BREEAM, DGFNB, CASBEE or similar for buildings.

Furthermore, all environmental considerations included in the document Environmental Impact Evaluation of Branding and Signage Solutions for Events published at the end of 2020 by the IOC and the Union of European Football Associations (UEFA) are included in this category; this document provides important guidance on the choice of branding and signage items used in sport competition venues.

³Legislative Decree 36/23, article 57.

⁴Regulation (EC) No. 66/2010.



b. Social criteria are designed to promote the application of social standards and their aim is to ensure:

- inclusion and diversity (gender, age, cultural differences, ability);
- the creation of opportunities for social economy and social enterprises;
- decent working conditions for all;
- respect for social rights and workers' rights;
- accessibility and inclusive design;
- respect for human rights, as well as advocacy of ethical trade issues.

Social criteria will be taken into account in general as well as in specific contractual clauses that call for the "Structured Dialogue" tool (as detailed in the following pages).

c. In addition, it will be requested that **Economic operators safeguard the working conditions of employees**. Then, the personnel employed must be subject to the national and territorial collective bargaining agreement (CCNL) in force for the sector and the area in which the work is performed.

d. The environmental and/or social qualification of economic operators can be assessed by virtue of the organisation concerned meeting one or more of the following requirements:

- an Environmental Management System certified according to ISO 14001:2015, EMAS or equivalent standards;
- a certified/verified Social Aspects Management System according to SA8000, ISO 26000, ISO 45001-2018 or equivalent Corporate Social Responsibility management systems;
- participation in multi-stakeholder initiatives, and/or publishing a Sustainability Report, according to recognised international standards, such as the GRI.

4.2 THE SIX KEY STEPS OF THE SOURCING PROCESS

1. IDENTIFICATION OF GENERAL CONTRACTUAL CLAUSES

Contractual clauses are the environmental and social sustainability criteria that the supplier undertakes to comply with for the duration of the contract. They allow sustainability standards to be maintained throughout the supply or service provision and enable the right to inclusion, human and social rights to be protected at every stage of the supply chain.

2. IDENTIFICATION OF THE PURPOSE OF THE SUPPLY

The purpose of goods and services determines the permissible scope of technical specifications and specific contractual clauses. Social and environmental criteria will be included in the procurement process, to enable suppliers to understand the importance attached to the environmental and social requirements of the supply or service.

3. IDENTIFICATION OF SELECTION CRITERIA FOR ECONOMIC OPERATORS

The criteria for selecting economic operators involve certified technical and organisational qualifications for proper environmental management (e.g., ISO 14001:2015, EMAS), for sustainability reporting according to accepted standards (such as GRI) and/or knowledge of their own environmental footprint (Organisational Environmental Footprint) or of their environmental performance throughout the product/service life cycle (LCA).

4. DRAFTING OF TECHNICAL SPECIFICATIONS

Technical specifications are the requirements that services, materials, products and works must meet for procurement to be considered sustainable, in relation to clearly defined and measurable environmental and social criteria.

Technical specifications can refer to:

- the technical norms or standards concerning environmental or social aspects (international, European, or national, UNI norms, ecolabels, etc.);
- the level of environmental/social performance or functionality of the good, service or work, taking into account its environmental impact (e.g., energy performance, pollutant emissions, CO2 limits, recycled content, etc.). Processes or production methods can also be specified, to demonstrate environmental performance. The requirements of the Italian Recovery and Resilience Plan (PNRR) for public procurement can also be considered as a social criterion – that is the employment of a quota (at least 30%) of young people and women.

The environmental and social criteria identified for each category of a procedure are divided into minimum (or basic) criteria and award criteria.

5. DESCRIPTION OF AWARD CRITERIA

The award criterion for recognising the environmental and social quality of procurement is the Most Economically Advantageous Tender (MEAT). The lowest-price criterion will have an important role in determining economic sustainability, but not a predominant one, except in specific instances, which will be justified on a case-by-case basis.

The most economically advantageous tender will be evaluated in terms of:

- quality/price, where separate scores are given for the quality of work/service/supply and for its price; scores also consider process, product or service innovations aimed at achieving increased performance, economic, environmental and social objectives, as well as partnerships between economic operators;
- cost-effectiveness, by assessing all costs: direct costs of purchase, indirect costs of use, maintenance and disposal, and indirect costs connected with the assessment, using objective calculation criteria, of environmental and social externalities throughout the life cycle.

6. IDENTIFICATION OF TOOLS FOR VERIFYING COMPLIANCE WITH THE REQUIRED CRITERIA

Verification that materials, products, services and works comply with the environmental and social requirements set out in technical specifications or contractual clauses is extremely important and involves:

- certifications of conformity;
- test reports;
- manufacturer's technical documentation.

DEFINITIONS

Minimum Criteria

These are the basic criteria which must be met in order to participate in a tender and which are included in the technical specifications and in the contractual clauses.

Award Criteria

These are the environmental and social criteria that are given scores, to evaluate the environmental and social commitment of the supplier participating in the tender.

Here below a list of relevant and potential criteria that Fondazione includes as minimum and/or awarding criteria in the procurement process.



MAIN CRITERIA FOR MATERIALS AND PRODUCTS RELEVANT TO THE OLYMPIC AND PARALYMPIC WINTER GAMES MILANO CORTINA 2026

WOOD OR WOOD PRODUCTS¹

Certification of provenance from sustainably/responsibly managed forests (FSC, PEFC or equivalent) with full chain of custody or product certification or product certification "FSC® Recycled", "FSC® mixed" or "PEFC™ Recycled" or product certification issued by a conformity assessment body certifying the recycled content (e.g., ReMade in Italy® or equivalent).

Exclusion of all products made from wood of tropical species, regardless of whether they have any certification (e.g., no teak).

If wood-based panels containing formaldehyde resins are used, formaldehyde emissions from the panels used in the finished product must be less than 0.080 mg/m³.

RECYCLED COPYING AND GRAPHIC PAPER²

Prefer to purchase recycled paper. In this case, the paper must consist of at least 70% by weight recycled cellulose fibre. The virgin fibres used to make the paper must come from sustainably/responsibly managed forests or controlled sources with full chain of custody certification (FSC, PEFC or equivalent).

Products are compliant:

- with environmental label EU Ecolabel, with % recycled fibre greater than or equal to 70%;
- with environmental label Der Blaue Engel;
- with product certification "FSC® Recycled", "FSC® Mixed" or "PEFC™ Recycled".

Virgin fibres used (less than 30% by weight of the finished product) must come from sustainably managed forests certified FSC, PEFC or equivalent with full chain of custody.

Exclusion of chlorine gas bleaching products.

MIXED OR VIRGIN COPYING AND GRAPHIC PAPER³

In the case of purchasing paper made of mixed or virgin fibres, the virgin fibres used to make the paper must come from sustainably/responsibly managed forests or controlled sources with full chain of custody certification (FSC, PEFC or equivalent).

Products are compliant:

- with environmental label EU Ecolabel;
- with environmental label Nordic Swan;
- with product certification with full chain of custody (FSC, PEFC or equivalent).

METALS AND MINERALS FOR MONOMATERIAL PRODUCTS (E.G. MEDALS)

All metal used in mono-material products must be from recycled material with documented traceability (through product certification of TYPE I - ISO 14024; self-declaration of TYPE II - ISO 14021 or certification of TYPE III - ISO 14025).

¹ Refer to the **Minimum Environmental Criteria** for the supply of new interior furnishings, for the contracting of the interior furnishing rental service and for the contracting of the service life extension of interior furnishings, approved by DM 23 June 2022 no. 254. <https://gpp.mase.gov.it/CAM-vigenti>

² Refer to the **Minimum Environmental Criteria** for the purchase of copying and graphic paper, approved by DM 4 April 2013. <https://gpp.mase.gov.it/CAM-vigenti>

³ Refer to the **Minimum Environmental Criteria** for the purchase of copying and graphic paper, approved by DM 4 April 2013. <https://gpp.mase.gov.it/CAM-vigenti>

PRODUCTS WITH RELEVANT METAL AND MINERAL COMPONENTS (E.G. ITC)

The origin of virgin metals and minerals must be known and communicated to the Fondazione Milano Cortina 2026.

Companies supplying products containing metals and minerals from conflict or high-risk areas (tin, tantalum, tungsten and gold) must have a public and strict policy regarding their supply and must demonstrate participation and adherence to the European Partnership of Responsible Minerals (EPRM) or the Responsible Mineral Initiative (RMI) or equivalent.

To supply any rare earths (e.g. cobalt), the supplier must prove that it has taken measures to exercise due diligence in order to reduce geopolitical and other sustainable development risks.

CHEMICALS

Products must be manufactured in compliance with the REACH Regulation⁴, with particular reference to the substances listed in Annex XIV and Annex XVII to REACH. The chemicals used must comply with the REACH Regulation. Whenever possible, the finished products free of Substances of Very High Concern (SVHC)⁵ are preferable.

FIBRES FOR TEXTILES: COTTON AND OTHER NATURAL FIBRES⁶

Possession of the EU Ecolabel or another environmental label in accordance with EN ISO 14024 or the Standard 100 by OEKO-TEX® label or equivalent.

FIBRES FOR TEXTILES: SYNTHETIC FIBRES⁷

They must be predominantly recycled or contain by-products from industrial symbiosis.

FOOD AND BEVERAGE FOR CATERING⁸ (SEE THE FOOD POLICY)

Provide, for each occasion, the offer of a single meat or fish dish, and for the remaining part of the offer vegetarian dishes, also containing vegetable proteins, of bread with whole meal flours.

It is also important to:

- guarantee dishes for people with specific needs due to allergies and intolerances (for coeliac disease, it is important to be able to guarantee gluten-free dishes).
- consider, depending on the context, dishes that take into account specific needs due to dietary restrictions or cultural and religious dietary regimes;
- communicate menus adequately to users, including the list of allergens.

Prefer mains or micro-filtered water. If this is not possible, provide water with a returnable vacuum system or on deposit, or the use of bottles made of recyclable material consisting of at least 30% recycled material (e.g. PET/paper and aluminium). Please refer to the Food Policy of Fondazione for specific requirements.

DISPOSABLE TABLEWARE AND FOOD CONTAINERS

Always use washable tableware and food containers. The use of disposable products is only permitted if reuse options are not available or are very limited (commercially or holistically, e.g. no washable options). If disposable products are used, they must be biodegradable and compostable (EN 13432 certified or equivalent standards) or in recyclable paper. In case they are made out of biodegradable and compostable material, there must be separate collection of the organic fraction and there must be adequate composting facilities to which these materials are sent. In case they are made out of paper, there must be separate collection for the paper fraction.

⁴ Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

⁵ <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32006R1907>

⁶ Substances that are of very high concern for human health or the environment. Please refer to the Candidate List of substances of very high concern.

⁷ www.echa.europa.eu/candidate-list-table

⁸ Refer to the Minimum Environmental Criteria for the supply and hire of textile products, approved by DM 30 June 2021. <https://gpp.mase.gov.it/CAM-vigenti>

⁹ Ibidem

¹⁰ Refer to the Minimum Environmental Criteria for the entrusting of the catering service and for the supply of foodstuffs, approved by DM no. 65 of 10 March 2020, and to the Minimum Environmental Criteria for event organization and realization service, approved by DM no. 459 of 19 October 2022. <https://gpp.mase.gov.it/CAM-vigenti>

**RESTAURANTS OR OTHER
HO.RE.CA. ENTITIES**

Give preference to operators with environmental certifications (ISO 14001, EMAS, EU Ecolabel or equivalent) and with social commitments (e.g., operators employing staff from disadvantaged and vulnerable groups). Require, whenever possible, raw materials certified organic, locally sourced and from short supply chains (for the purposes of this criterion, "locally sourced" means within a radius of 70 km from the accommodation facility).

CRITERIA FOR HIGH IMPACT SUPPLY CHAINS**PACKAGING⁹**

Packaging must be reduced to a strictly functional minimum.

Packaging (primary, secondary and tertiary) must be made of materials which can be easily separated by hand into parts consisting of a single material (e.g., cardboard, paper, plastic, etc.) which is recyclable and preferably made of recovered and/or recycled and/or renewable material. Plastic packaging must be identified in accordance with CEN/CR 14311 "Packaging - Marking and material identification system". Secondary and tertiary packaging must consist of at least 70% by weight of recycled material if made of paper or cardboard, at least 30% by weight of recycled material if made of plastic.

Pallets or other wood packaging are made from wood sourced from sustainably/ responsibly managed forests (certified FSC®, PEFC™ or equivalents) or recycled wood (certified "FSC® Recycled", "Remade in Italy" or equivalents) or wood consisting of a variable percentage of the above two fractions.

The supplier must specify the solutions envisaged for using materials obtained from the by-products of agricultural production (e.g., residues from grapes, citrus fruits, hazelnuts, maize, etc.).

The supplier (also in cooperation with the logistics operator) should specify the solutions planned for the reuse of secondary and tertiary packaging with reverse logistics systems.

All packaging must be disassemblable, identifiable by component, and recyclable, and must contain instructions for easy delivery to separate collection and recycling systems, including by the end user.

No oxo-degradable products, components or materials may be used.¹⁰

FURNITURE AND EQUIPMENT¹¹

The supplier must specify the solutions planned to maximise the production of furniture and equipment from recycled, recovered or processed (upcycle) materials.

All furniture and equipment must be made of materials that are easily disassembled, identifiable by component and recyclable.

The supplier must specify the solutions envisaged for the reuse of the furniture and equipment once the use phase is over (e.g., reuse in other events or donation to third parties or reconditioning process).

⁹ Refer to the Minimum Environmental Criteria for the supply of new interior furnishings, for the contracting of the interior furnishing rental service and for the contracting of the service life extension of interior furnishings, approved by DM 23 June 2022 no. 254. <https://gpp.mase.gov.it/CAM-vigenti>

¹⁰ Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.

¹¹ Refer to the Minimum Environmental Criteria for the supply of new interior furnishings, for the contracting of the interior furnishing rental service and for the contracting of the service life extension of interior furnishings, approved by DM 23 June 2022 no. 254. <https://gpp.mase.gov.it/CAM-vigenti>



CLEANING AND RELATED SERVICES¹²

Give preference to suppliers with a valid certified environmental management system (ISO14001, EMAS or equivalent) relating to cleaning or sanitising activities.

All detergents used in routine cleaning of surfaces must bear the EU Ecolabel or other environmental labels in accordance with UNI EN ISO 14024.

All detergents used for special cleaning must have environmental labels in accordance with the technical standard UNI EN ISO 14024.

TRANSPORT AND LOGISTICS¹³

The vehicles purchased or leased by Fondazione and/or used by transport and logistics service, whenever possible, must be clean and energy-efficient, as defined in the Directive 2019/1161/EU on the promotion of clean and energy-efficient vehicles, in the following proportions out of the total purchases in the same category:

- Light vehicles: at least 38.5%.
- Trucks: at least 10%.
- Bus: at least 45%.

PRINTERS¹⁴

Printers, whether purchased, rented, leased or supplied with Managed Print Services, must comply with the energy efficiency requirements of the ENERGY STAR labelling scheme (latest version). Printers with an environmental label compliant with EN ISO 14024 (e.g., Der Blaue Engel, Nordic Swan, EU Ecolabel) are presumed compliant.

COMPUTER AND NOTEBOOK

Notebook computers must meet the minimum energy performance requirements of the ENERGY STAR scheme (latest version). Devices with the environmental label: TCO Certified Generation 8, EPEAT 2018 for Computers, Blue Angel, TÜV Green Product Mark or equivalent are assumed to comply.

ANY GOOD/ASSET

For each type of good/asset procured, a request must be made to the supplier for the possibility of:

- rent/hire;
- reuse at end of event.

The contractual specifications must include the modalities for reuse at the end of use by Fondazione and the modalities for storage.

For consumer goods (e.g., gadgets, uniforms, etc.) the methods for managing inventories must be defined with the supplier, where possible.

¹² Refer to the Minimum Environmental Criteria for the contracting of cleaning services of buildings and other environments for civil use, and the Minimum Environmental Criteria for the supply of detergents for ordinary cleaning of surfaces, detergents for periodic and extraordinary cleaning of surfaces, detergents and tissue products for personal hygiene. <https://gpp.mase.gov.it/CAM-vigenti>

¹³ Refer to the Minimum Environmental Criteria for the purchase, leasing, rental, hire of road transport vehicles, approved by DM 17 June 2021. <https://gpp.mase.gov.it/CAM-vigenti>

¹⁴ Refer to the Minimum Environmental Criteria, approved by DM of 17 October 2019, for the entrusting of the managed printing service, the entrusting of the rental service of printers and multifunctional office equipment, the purchase or leasing of printers and multifunctional office equipment. <https://gpp.mase.gov.it/CAM-vigenti>

CRITERIA FOR ORGANISATIONS – SUPPLIERS OF GOODS AND SERVICES

MANAGEMENT SYSTEMS

Preference should be given to suppliers that have adopted management systems with valid certification issued by an ACCREDIA-accredited certification body or by another body that has signed mutual recognition agreements with ACCREDIA, in the IAF area or issued by bodies accredited or adhering to EA MLA agreements.

- Environmental: e.g., ISO 14001, EMAS (Eco-Management and Audit Scheme)
- Social: e.g. SA8000
- Energy: e.g. ISO 50001
- Health and safety: e.g. ISO 45001
- Quality: e.g. ISO 9001
- Diversity, equity and inclusion: e.g., UNI/PdR 125:2022 (Italian companies) and/or ISO 30145 (Italian and foreign companies).
- Anti-corruption: e.g. ISO 37001
- Calculation of GHG greenhouse gas emissions (CO₂eq): e.g. ISO 14064. In relation to the calculation, the definition of a strategy for reducing emissions and offsetting the residual one will be considered positively. Moreover, encourage the assumption of responsibility for offsetting of GHG emissions related to the product or service offered to Fondazione through certified projects with internationally recognized high quality standards or local projects; give preference to those who commit to offsetting.
- For venues, event organisers, suppliers of goods or services for events: e.g. ISO 20121
- For hotels for travel: e.g., Global Sustainable Tourism Council (GSTC); Bio Hotels; Biosphere Standard for Hotels; Cabo Verde Sustainability Standard for Tourist Accommodations; Global Ecosphere Retreats (GER); Green Key; EU Ecolabel; European Ecotourism Labelling Standard (EETLS); EarthCheck; Ecotars; eLabel!; Charm & Dream.
- For restaurants: pre-qualified by Procurement based on the environmental and social characteristics of the establishment.

SUSTAINABILITY REPORTING

Give preference to suppliers who publish sustainability reports (e.g., sustainability report on the social and environmental risks the company have to face and on how its activities impact people and the environment; sustainability report with third-party assurance according to GRI, ESRS or similar standard).

TRACEABILITY AND TRANSPARENCY OF THE SUPPLY CHAIN

Give preference to suppliers who can transparently trace their supply chain (from the origin of raw materials to the finished product reaching the end user):

- In possession of ISO 20400 Guidance on Sustainable Procurement.
- through self-declarations compliant with relevant regulations, including traceability documentation demonstrating sourcing origins.
- Registered in Corporate Social Responsibility (CSR) assessment system: e.g. Ecovadis. with an emphasis on traceability capabilities and supplier monitoring.

¹⁵ See Article 1 of Italian Law no. 68/1999.

¹⁶ I) Very disadvantaged workers within the meaning of Article 2, paragraph 99, of Commission Regulation (EU) no. 651/2014, as amended. II) Disadvantaged persons within the meaning of Article 4 of Italian Law no. 381/91, as well as persons benefiting from international protection within the meaning of Legislative Decree no. 251 of 19 November 2007, as amended, and homeless persons entered in the register referred to in Article 2, paragraph 4, of Italian Law no. 1228 of 24 December 1954, who are in such a state of poverty that they are unable to find and maintain housing independently. See Article 2, paragraph 4, of Legislative Decree no. 112/2017.

**HUMAN RIGHTS
AND ENVIRONMENTAL
DUE DILIGENCE**

Give preference to suppliers who have developed human rights and environmental due diligence in procurement, especially suppliers who can demonstrate comprehensive programmes that include:

- Sustainable Procurement Policy or equivalent that shows ambition
 - Sustainable Procurement Procedures
 - Presence of a Code of Conduct or equivalent for their suppliers and how it is disseminated within their supply chain.
 - Identification of environmental and social risks in their operations and supply chain
 - Action plans to manage any adverse environmental and social impacts
 - Presence of grievance mechanisms for own operations, service providers and in the supply chain, support remediation when relevant
 - Monitoring of effectiveness of the implementation plan
-

GENDER EQUALITY

Give preference to suppliers that have in their staff and/or involve in the performance of services for Fondazione at least 33% female members or in a different % referring to the types of activities listed in Attachment B of UNI/PdR 125:2022.

**LABOUR INCLUSION OF PEOPLE
WITH DISABILITIES¹⁵ AND
DISADVANTAGED PEOPLE¹⁶**

Give preference to suppliers who:

- have at least 10% of persons with disabilities and/or disadvantaged persons in their workforce; and/or
 - involve at least 10% persons with disabilities and/or disadvantaged persons in the performance of services for Fondazione.
-

SOCIAL COOPERATIVE

Give preference to suppliers that are (I) type B or A+B social cooperatives or (II) Temporary Association of Companies formed with a type B or A+B social cooperative, in order to promote the employment of persons with disabilities and disadvantaged persons.

**SOCIAL COMMITMENT
ALONG THE SUPPLY CHAIN**

Give preference to suppliers that involve in their supply chain small enterprises¹⁷ and/or social enterprises¹⁸.

¹⁷) Micro-enterprise understood as a company meeting the following requirements: fewer than 10 employees; annual turnover or balance sheet not exceeding €2 million.

¹⁸) Small enterprise understood as a company meeting the following requirements: 10 to 49 employees; annual turnover or balance sheet not exceeding €10 million.

¹⁸ Such as, in relation to the Italian context: type B or type A+B social cooperatives, third sector organizations registered with RUNTS.

4.3 DUE DILIGENCE FOR SOCIAL RIGHTS

To promote the inclusion of social criteria at every stage of the value chain, and especially respect for human rights, Fondazione Milano Cortina 2026 uses a new tool:

- Structured Dialogue¹⁹, in its “complete” or “short” versions.

STRUCTURED DIALOGUE

Structured Dialogue consists of eight implementation actions:

1. Inclusion by Fondazione Milano Cortina 2026 of general and specific contractual clauses on compliance with minimum social standards among the conditions of contractual performance;
2. Signing by the economic operator of a minimum social standards compliance statement as outlined in the IOC Code of Ethics and the Code of Ethics of Fondazione;
3. Completion by the economic operator of a Monitoring Questionnaire (full or short version) on compliance with minimum social standards, with regular updates;
4. Availability of the economic operator for clarification and meetings;
5. Possibility for stakeholders to address grievances;
6. Possible audits at the premises of the economic operator's supply chain by inspectors delegated by Fondazione Milano Cortina 2026;
7. Availability on the part of economic operators to implement corrective actions, including remedy to impacted parties;
8. Penalties in proportion to the severity of specific contractual breaches related to “non-compliance” with minimum social criteria along the supply chain, until the natural expiry of the contract or its termination.

4.4 INVOLVEMENT OF ECONOMIC OPERATORS

The identification of environmental and social criteria by the Fondazione represents a unique opportunity to steer the market towards sustainability through a structured dialogue that ensures the achievement of proportional principles, with those economic operators most reactive to assure price for quality in terms of sustainability, respect of service level agreements, and respect of environment and human rights.

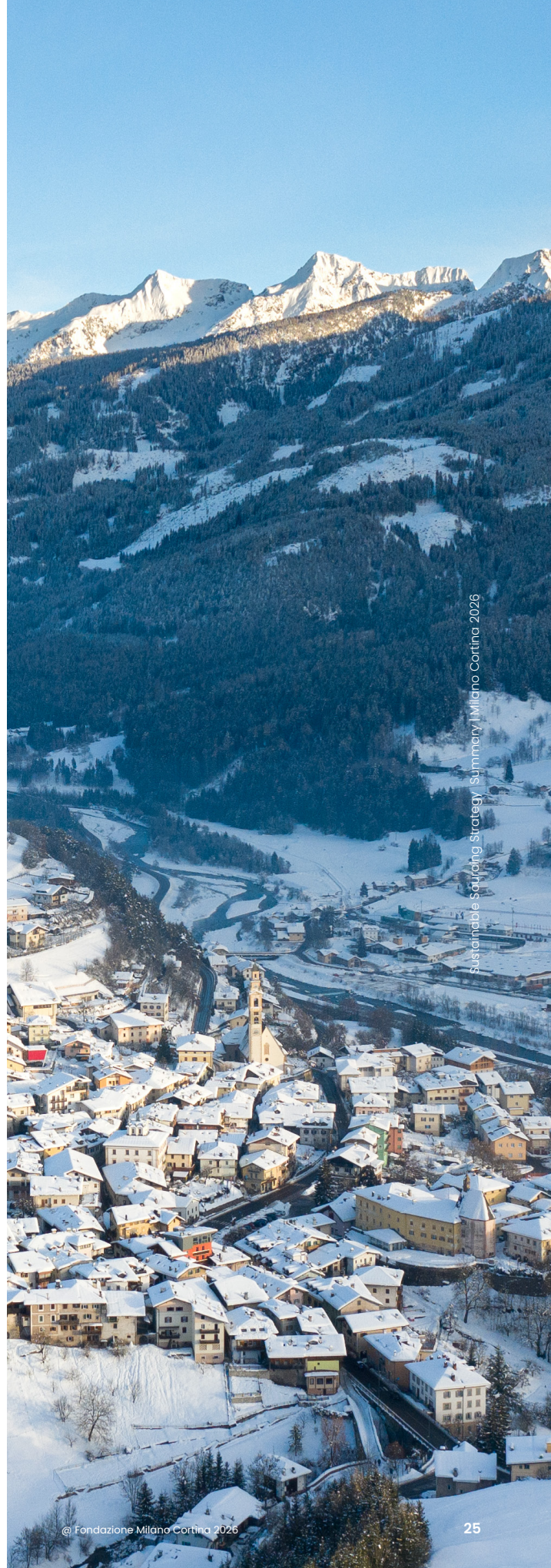
To enable market operators to comply with the sustainability criteria, Fondazione has prepared:

- an ancillary document to this Strategy, which contains the guiding principles, implementation framework, tools and objectives for main products and services, to be taken in consideration throughout the life cycle of the Games and published on Fondazione's website;
- a questionnaire dedicated to licensed operators;
- the organisation of targeted meetings whenever required, with all operators invited to negotiate;
- dissemination of information, when appropriate, through the Chamber of Commerce, the most representative Entrepreneur Associations and Fondazione's website.

Finally Fondazione activated Impact 2026, a social procurement programme open to social, micro, small and medium businesses in Italy. It stems from a collaboration between Fondazione Milano Cortina 2026, Fondazione Giacomo Brodolini, and Yunus Sports Hub. The goal of the project is to make the Games more inclusive and sustainable and favour access to the economic opportunities of the Games for social, micro, small and medium businesses. Through Impact 2026, Fondazione Milano Cortina 2026 and its stakeholders can maximise the legacy of the Games, orienting purchases in the supply chain around a positive social impact.

4.5 MONITORING AND REPORTING ON ENVIRONMENTAL AND SOCIAL BENEFITS

Fondazione intends to monitor the impact generated by decisions and actions taken with the aim of keeping sustainability initiatives aligned with the expectations of stakeholders; promoting a culture of effective sustainable procurement and accountability; monitoring progress and continuous improvement; and maintaining an informed dialogue with economic operators, based on true and accessible information. The implementation of sustainability principles in the procurement procedures is assessed through a set of KPIs (e.g., number and value of purchases with at least one sustainability criteria required to the suppliers, percentage of local providers, percentage of small and social enterprises, etc.).



Annex

FURTHER DETAILS ON INTERNATIONAL AND NATIONAL INITIATIVES



INTERNATIONAL INITIATIVES AND GUIDELINES

The UN 2030 Agenda for Sustainable Development



The UN 2030 Agenda for Sustainable Development is the global action plan which governments (including the Italian government), companies and non-profit organisations refer to, and which pursues five macro-objectives (further specified into 17 Sustainable Development Goals – SDGs):

1. **People** – end hunger and poverty in all their forms and ensure dignity and equality;
2. **Planet** – protect our planet's natural resources and climate for future generations;
3. **Prosperity** – ensure prosperous and fulfilling lives in harmony with nature;
4. **Peace** – foster peaceful, just and inclusive societies;
5. **Partnership** – implement the Agenda through a solid global partnership.

Specifically, Goal 12 – “Ensure sustainable consumption and production patterns” – calls on public and private organisations to adopt policies and procedures for integrating environmental and social considerations into normal procurement processes, specifying how this should be done in target 12.6 – “Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information in their reporting cycle” – and in target 12.7 – “Promote public procurement practices that are sustainable, in accordance with national policies and priorities.”

The UN Guiding Principles on Business and Human Rights



The UN Guiding Principles on Business and Human Rights are a call to action for states and business enterprises to ensure respect for human rights by all business operators, both public and private. **States and businesses are called to protect people from abuse, respect human rights and remedy violations committed.**

The fundamental conventions of the International Labour Organization (ILO)

These include: ILO Minimum Age Convention No. 138, ILO Worst Forms of Child Labour Convention No. 182, ILO Forced Labour Convention No. 29, ILO Abolition of Forced Labour Convention No. 105, ILO Equal Remuneration Convention No. 100, ILO Discrimination (Employment and Occupation) Convention No. 111, ILO Freedom of Association and Protection of the Right to Organise Convention No. 87, and ILO Right to Organise and Collective Bargaining Convention No. 98.

The OECD Due Diligence Guidance for Responsible Business Conduct



The OECD recommends that enterprises conduct due diligence in order to identify, prevent or mitigate and account for how actual and potential adverse impacts are addressed. Adverse impacts might be related to workers, human rights, the environment, bribery, consumers and corporate governance. The Guidance draws from approaches contained in sector-specific due diligence guidance already developed by the OECD.

The Ten Principles of the United Nations Global Compact



The UN Global Compact is a call to companies to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals.

HUMAN RIGHTS

Principle 1: businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7: businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility;

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: businesses should work against corruption in all its forms, including extortion and bribery.

The 12 Level 1 indicators of the United Nations Global Marketplace

The 12 Level 1 indicators for sustainable procurement, adopted by the United Nations Global Marketplace within the framework of sustainable procurement tools are:

- **Prevention of pollution**
- **Sustainable resource use**
- **Climate change mitigation and adaption**
- **Protection of the environment, biodiversity and restoration of natural habitats**
- **Human rights and Labour issues**
- **Social inclusion of persons with disabilities**
- **Gender issues**
- **Social health and well-being**
- **Whole life cycle cost**
- **Local communities MSMEs and supplier diversity**
- **Promoting sustainability throughout the supply chain**
- **Generic additional indicators**

The Olympic Games Guide on Sustainable Sourcing

The Olympic Games Guide on Sustainable Sourcing is aimed at Organising Committees of the Olympic Games and covers all aspects of what can be purchased for the event. The guidelines state that sustainability is an essential component of all modern Games, and a central theme of the Olympic Agenda 2020, reaffirmed in the Olympic Agenda 2020+5 and already identified in the 2016 IOC Sustainability Strategy.

The IOC Sustainability Strategy strives to ensure that the Games are at the forefront of sustainability and that host cities can use it as a tool to promote sustainable local development.

EUROPEAN INITIATIVES

The European Green Deal



The European Green Deal, European Commission Communication No. 640 of 11 December 2019 sets out a “new growth strategy that aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use”. The European Green Deal Investment Plan (European Commission Communication No 21 of 21 December 2019) also foresees that the “Commission will propose minimum mandatory green criteria or targets for public procurement in legislation on sectoral initiatives, EU funding or specific products”, and introduces a “sustainable procurement screening” tool, based on the existing voluntary ex ante mechanism for large infrastructure projects.

The European Pillar of Social Rights



Consists of 20 fundamental principles and social rights, adopted by the European Parliament, the Council and the Commission on 17 November 2017 in Gothenburg, Sweden, which are considered fundamental to ensuring equity, inclusion, dignity and social protection. These principles represent a beacon that shines a light on the vision behind the “body of social standards” in the European Union. Eight of these principles also have a strong relevance for the Games:

- **Gender equality**
- **Equal opportunities** (irrespective of sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation)
- **Flexible and secure employment**
- **Fair wages that provide a decent standard of living**
- **Social dialogue and employee involvement**
- **Healthy, safe and adequate working environment and data protection**
- **Inclusion of people with disabilities**
- **Access to essential services**

ITALIAN INITIATIVES

The National GPP Action Plan



By Ministerial Decree of the Ministry of Environment and Energy Safety dated August 3, 2023, in collaboration with the Minister of Enterprises and Made in Italy, and with the Minister of Economy and Finance, the 2023 edition of the “National Action Plan for Environmental Sustainability of Consumption in the Public Administration Sector” has been officially approved.



National Action Plan on Business and Human Rights 2021–2026

Following the National Action Plan on Business and Human Rights 2021–2026, published by Comitato Interministeriale per i Diritti Umani (CIDU), the ‘Second National Action Plan on Business and Human Rights 2021–2026’ was launched. The tool that was published was the result of a stocktaking exercise with multiple stakeholders in the implementation of the “Guiding Principles on Business and Human Rights” adopted by the United Nations in 2011.



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