

SUSTAINABLE SOURCING CODE



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► SUSTAINABILITY AND BIRMINGHAM 2022

MAKING THE BIRMINGHAM 2022 GAMES THE MOST SUSTAINABLE GAMES YET

The Birmingham 2022 Commonwealth Games will have a significant, positive, outcome for the city, its people, and its local communities. It will play a crucial part in the recharge and recovery of the region: from the kickstart it will provide to the economy, to the renewed sense of progressive pride it will instil in citizens.

Our ambition is clear: we will deliver the most sustainable Commonwealth Games since the event began nearly a century ago.

As an enabling framework, we are implementing **ISO 20121** which is an international management standard created for the event industry, to enable organisations to deliver events in a sustainable way. Its creation was inspired by the London 2012 Olympic and Paralympic Games to demonstrate that sustainability had been considered throughout the planning and delivery process.

One of the most effective ways to deliver a sustainable Games is to embed sustainability upfront in the procurement process. Sustainable procurement is therefore an important part of delivering on Birmingham's sustainability vision. The working definition for sustainable procurement outlined in ISO 20400:

Sustainable procurement is the process of making purchasing decisions that meet an organisation's needs for goods and services in a way that benefits not only the organization but society as a whole, while minimizing its impact on the environment... into an organization's procurement processes.

Our strategy is intrinsically aligned to the Commonwealth Games Federations' themes of Humanity, Equality and Destiny as well as the United Nation's (UN) Sustainable Development Goals (SDGs). These goals are clear and compelling and task us all to work together to drive positive environmental, social, and economic outcomes by 2030.

For more information, please visit:

www.undp.org/sustainable-development-goals



THE SEVEN PILLARS OF SUSTAINABILITY

Our approach to sustainability has seven areas of focus:

1. Accessibility

B2022 is the Games for Everyone, and this means we want everyone to be able to experience and enjoy the Games as equals. We are committed to hosting a safe and secure, dignified experience for anyone involved in the Games, be it athletes, spectators, or media: our aim is to create access to sport for all. This means delivering accessible venues, facilities, and barrier-free environments so that these once in a lifetime Games for Birmingham can be an exciting experience for everyone.

2. Equality, Diversity and Inclusion (E, D & I)

We want to be sure that the Games are accessible and inclusive to all, regardless of gender, race, ethnicity, or socio-economic background. This is a vibrant and diverse region, and the Games needs to reflect this. It provides the perfect opportunity for all people to learn more about each other and develop a shared understanding on issues of inequality. B2022 will encourage and enable these conversations and provide an exceptional opportunity for cultural and commercial exchange among Commonwealth countries and act as a catalyst for shared experiences across arts, culture, and meaningful business engagement.

3. Job Creation and Social Value

Through the benefits and opportunities that the Games provides, we aim to reduce unemployment and upskill the workforce in the West Midlands. This will help our region to recover from the economic impact of the pandemic, as well as helping to reduce poverty and exclusion. By creating new opportunities for individuals, we will also improve health and wellbeing.

4. Human Rights

Sport drives positive social progress, and through the power of sport, we can make significant change to people's lives. Unlocking human potential to help transform society means that Human Rights must be established as a core value of the Games. This approach permeates the entire Games operation and will be reflected in all areas of the Games.

5. Carbon and Air Quality

Climate change poses an existential threat to humanity, and we must all act to mitigate our impact. We will build on the foundations of previous events of this scale to raise the bar on what can be achieved. Poor air quality is known to have a detrimental impact on health, and we believe that by working together we can make a difference. Our ambitions are aligned to the commitments of the UK, regional and local government ambitions on moving to net zero.

6. Circular Economy Principles to Minimise Waste

Traditional approaches to product creation and disposal deplete natural resources and create unsustainable amounts of waste. The circular economy is about designing waste out of the system by keeping products and materials in use. By reusing and recycling products, our ambition is to achieve zero waste to landfill and conserve resources for future generations.

7. Conservation

We are committed to doing what we can to conserve the natural environment for future generations. This means ensuring the conservation of our canals, rivers, and green spaces as part of our vital ecosystems. Beyond ecology, we are also looking to the Games to conserve and reinforce our cultural heritage, one of the most special attributes of the West Midlands.

► USING THIS DOCUMENT

This Sustainable Sourcing Code sets out the minimum requirements which shall be applied to procured Suppliers, with relation to sustainability. These standards are based on best practice, internationally recognised standards, and Commonwealth Games guidance documents, which are listed at the end of this document.

These minimum standards do not replace, but rather add to the applicable legal requirements, for which the Supplier must be able to provide evidence of meeting at any time during their contract. Both sets of requirements must be met.

The Principles set out are as follows:

Social Principles

Labour
Rights

Animal
Welfare

Workplace
Health &
Safety

Diversity and
Inclusion

Business
Ethics

Environmental Principles

Preservation
of Resources

Preservation
of Biodiversity

Waste
Management

Pollution
Prevention

Climate
Change and
improving Air
Quality

Under each heading is a sub-heading, which will detail specific minimum standards relating to that principle.

We will be working with specific individual suppliers to meet the sustainability pledge and our targets set to deliver on our pledge.

► IMPLEMENTATION OF THE DOCUMENT

WHO THE SUSTAINABLE SOURCING CODE APPLIES TO

This Sustainable Sourcing Code and its core Sustainability Principles set out the required and expected minimum standard from all our contracted Suppliers i.e., Commonwealth Games procurement teams, Direct suppliers of goods & services (First Tier suppliers), Sub tier suppliers of goods & services (intermediaries) and Origin suppliers of goods & services i.e., farm level/ raw material extraction/ fishing or input provision (Origin).

Key Responsibilities of Suppliers

All Contractors and Suppliers should guarantee to comply with the code and be able to demonstrate that they are continuously improving, beyond minimum requirements in their own operations. It is the responsibility of Contractor and Suppliers to cascade the Organising Committee (OC) Sustainability Principles, to Sub Contractors and workers, to enforce these standards within their own monitoring programme.

Suppliers' Supply Chain

As part of our Suppliers supply chain risk assessment, we encourage them to be aware of more vulnerable groups like women, migrant workers, indigenous peoples, smallholders, and homeworkers, and subcontracting and have adequate measures in place to ensure the rights of these groups are upheld.

Sub-Contracting

Sub-contracts are expected to meet the OC Sustainable Sourcing Code expectations.

Sharing Information with the OC

The OC is committed to the highest levels of transparency and to demonstrating our Sustainable Sourcing Code is part of everyday supply chain operations and that the OC are using the data insight to increase the effectiveness of our overall environmental and social impact. Our commitment to transparency means we expect our Suppliers to

share with the OC information regarding their relevant supply chain policies and practices, conditions, or risks in their supply chains, and how such conditions or risks are being prevented or addressed.

If requested by the OC, Suppliers will disclose to information related to their supply chain, on a specialized internet platform recommended by the OC; this may include information on raw materials, social, environment or ethical attributes and locations used in production and supply of those materials and services to the Games. The OC reserves the right to disclose this information publicly.

Right to Audit

The Supplier agrees that the OC or its authorised external body shall have the right at any time to monitor the permanent adherence and implementation by the Supplier to the Sustainable Sourcing Code. For this, we reserve the right to request Suppliers to complete self-assessments, disclose relevant policies or procedures, or to be subject to announced and unannounced on-site direct and/or third-party audits or evaluations of the Supplier facilities, including housing provided by the supplier or labour providers, and workplaces to which the Suppliers have sub-contracted the production of the OC procured products and services.

Breaches of the Sustainable Sourcing Code

If any of the Sustainability principles outlined in this code are found to be breached, the Supplier shall be expected to implement a corrective action plan and timeline to resolve the failure effectively and promptly. Where requested by the OC, the Supplier shall meet and discuss the reasons leading to the breach.

We are committed to working with Suppliers to support any necessary improvements and in line with the UN Guiding Principles, if through our operations

we have caused or contributed to a negative human rights impact, then we shall work collaboratively with our Suppliers to ensure the issues are remediated and practices put in place to avoid recurrence. If we then believe that there is both commitment from the Supplier to avoid a recurrence, and the capability to do so, we shall usually continue to work with them providing the breaches do not continue to reoccur. On the rare occasions that we do not believe the supplier is committed to remediation, the OC shall act, which may involve cancelling purchase orders and ceasing to trade in accordance with our contracted terms.

Suppliers must provide a grievance mechanism for workers (and their organisations, where they exist) to raise workplace concerns. This grievance mechanism must involve an appropriate level of management to

address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism must also allow for anonymous complaints to be raised and addressed. The existence and scope of this mechanism must be clearly communicated to all workers and their representatives, and all workers must have equal access.

Acceptance of the Sustainable Sourcing Code

Acceptance and adherence to these Principles is understood to be confirmed by the Suppliers when they accept to undertake business with the OC, including signature of a Contract and/or acceptance of a Purchase Order.



► 1.0 LABOUR RIGHTS

1.1 EMPLOYMENT IS FREELY CHOSEN

There is no forced, bonded or involuntary prison labour.

Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

1.2 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder the development of parallel means for independent and free association and bargaining.

1.3 WORKING CONDITIONS ARE SAFE AND HYGIENIC

A safe and hygienic working environment must be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Workers must receive regular and recorded health and safety training, and such training must be repeated for new or re-assigned workers.

Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food

production must be provided. Please note that no employees will be allowed to bring their own food and drinks on to any Games venue during the lockdown period.

Accommodation, where provided, must be clean, safe, and meet the basic needs of the workers. The company observing the code shall assign responsibility for health and safety to a senior management representative.

1.4 CHILD LABOUR MUST NOT BE USED

There must be no recruitment of child labour. Companies must develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

Children and young persons shall not be employed at night or in hazardous conditions.

These policies and programs must conform to the provisions of the relevant International Labour Organization (ILO) Standards.

1.5 STATUTORY LIVING/MINIMUM WAGES ARE PAID

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.

All workers must be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

Deductions from wages as a disciplinary measure must not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures shall be recorded.

1.6 WORKING HOURS ARE NOT EXCESSIVE

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection for workers.

All overtime must be voluntary. Overtime shall be used responsibly, taking into account: the extent, frequency and hours worked by individuals and the workforce as a whole.

1.7 NO DISCRIMINATION

There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion or belief, age, disability, gender, gender reassignment, marital status, maternity or pregnancy, sexual orientation, union membership or political affiliation.

1.8 REGULAR EMPLOYMENT IS PROVIDED

To every extent possible work performed must be on the basis of an employee or worker relationship compliant with national law and all individuals working under such contracts must be treated fairly and their legal rights respected at all times. For the avoidance of any doubt, this requires Suppliers and their sub-contractors or suppliers to engage their workforce by using employment or worker contracts (i.e. a contract of service or a contract attracting statutory rights as a worker) and not any other kind of contract for the provision of services wherever possible. A relationship on any other basis shall not be justified by the individual expressing a preference for that other kind of relationship, unless no other appropriately skilled individuals are available to be engaged using employment or worker contracts.

Labour only contracting, subcontracting, home-working arrangements, or internship or apprenticeship schemes where there is no real intent to impart skills or provide regular work shall not be used to avoid statutory obligations to employees and workers under labour or social security laws and regulations. Nor shall any such obligations be avoided through the excessive use of fixed-term or zero hours contracts. Zero hours contracts, while lawful and appropriate in certain circumstances, should not be used by suppliers as a substitute for proper business planning to align their recruitment and mobilisation to meet the workforce requirements and service levels to which they have committed in their contracts with B2022.

1.9 NO HARSH OR INHUMANE TREATMENT IS ALLOWED

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

► 2.0 ANIMAL WELFARE

2.1 ANIMAL PRODUCTS

In line with industry principles on country-of-origin information, suppliers must be able to indicate the origin of any meat, meat products, eggs and dairy products, which it commits to supply. All meats supplied shall be obtained from countries that have been approved by the UK for supply of meats and meats products and therefore should be products from the UK, any EU country or any other country originating from a national or regional quality scheme recognised by the UK as produced in line with annual independent farm and processor scheme inspections accredited to BS EN ISO/IEC17065:2012 or equivalent standards.

2.2 ANIMAL TESTING

Animal testing shall not be performed if another scientifically satisfactory method of obtaining the result sought, not entailing the use of an animal, is reasonably and practically available.



► 3.0 WORKPLACE HEALTH AND SAFETY

3.1 ASSESSMENT OF GOODS

Suppliers must assess all goods supplied against the hierarchy to ensure they are safe and suitable for the purpose for which it is supplied.

3.2 SAFETY DEVICES

Applicable safety devices must be fitted and used as instructed or as stated in current guidance or regulations, it shall be ensured they are operational, inspected and maintained.

3.3 SAFETY INFORMATION FOR SUPPLIED GOODS

Relevant safety information, such as Safety Data Sheets, must be supplied for all goods supplied to the OC. Safety information must be provided in English. All chemicals must be appropriately labelled and packaged.

3.4 ALTERNATIVE PRODUCTS

Goods supplied shall meet the requirements of the initial contract and will not be replaced with an alternative product or sourced from an alternative supplier without prior approval by the OC.

3.5 SAFEST AVAILABLE PRODUCTS

Suppliers shall source the safest product available to meet the needs of OC.



► 4.0 DIVERSITY AND INCLUSION

4.1 CONDUCT AS A SUPPLIER

The Supplier must as a minimum comply with the requirements of the Equality Act 2010 and all other relevant equality legislation. The Supplier must act with fairness, be non-discriminatory, act with respect and inclusivity towards staff, volunteers and spectators of the Commonwealth Games, as well as other suppliers, and the local community.

4.2 EQUALITY AND DIVERSITY

The Supplier will promote equality and diversity in their own workforce and supply chain. Those delivering a service to customers on behalf of B2022 or services to B2022 staff must recognise that they inherit the requirement to comply with the Public Sector Equality Duty if the Supplier is carrying out a public function.

Please see the B2022 Equal Opportunities, Diversity and Inclusion Policy for further details.



► 5.0 BUSINESS ETHICS

5.1 SUPPLIER SELECTION PROCESS AND CONFLICT OF INTEREST

The Supplier shall cooperate with the OC and provide accurate and complete information for integrity and compliance screenings (prior and during the selection, contracting and/or monitoring process). The Supplier shall declare any potential conflict of interest to the OC prior to the start of the selection process and at any time during the business relationship.

5.2 ANTI-BRIBERY AND CORRUPTION, ANTI-MONEY LAUNDERING, COMPETITION LAW AND INTERNATIONAL TRADE SANCTIONS

The Supplier shall abide by all applicable anti-corruption, anti-money laundering, international trade sanctions, data privacy and competition laws. The Supplier shall not engage in any form of bribery or corruption to obtain an unfair or improper advantage, whether actual or perceived.

The Supplier shall not participate in activities which could prevent competition. The Supplier shall not have dealings with restricted parties (in accordance with international trade sanctions law).

Please see the Birmingham 2022's Anti-Corruption, Counter-Fraud, Bribery, Gifts and Gratuities Policy for further details.

5.3 GIFT AND HOSPITALITY

The Supplier is prohibited from offering gifts or hospitality above a nominal value to the OC employees, customers, or other relevant stakeholders (such as government officials) when working on behalf of the OC. Any gift offered must be of a purely nominal value and must not be intended (or able to be perceived as such) to influence a business decision. Hospitality offered must be linked to business purposes, must be of an appropriate value and must not be intended (or able to be perceived as such) to influence a business decision. No gift or hospitality may be offered during tender or contractual negotiations.

5.4 RAISING A CONCERN

Any failure to comply with this Policy (including any failure by an employee of the OC or anyone acting on behalf of the OC to so comply), of which the Supplier is aware, shall be immediately reported to the OC. The failure to do so shall be a breach of Commonwealth Games' Sustainable Sourcing Code.

Any concern from the Supplier, its agents or its sub-contractor, or any OC agent, regarding these Sustainability Principles or their application shall be reported to the usual contact at the OC.

At the OC we strongly support a culture of speaking up for both Suppliers and their workers without any fear of retaliation against those who report actual or suspected breaches. The OC has a zero tolerance on attacks on Human Rights Defenders and expects Suppliers to adopt the same approach and cascade this to their Suppliers.

To report a concern, they should contact the Whistleblowing Officer, Caroline McGrory, who is also the Chief Legal Officer.

The law recognises that in some circumstances it may be appropriate for individuals to report their concerns to an external body such as a regulator. Staff can always seek advice about reporting a concern to an external body. The independent organisation 'Protect' operate a confidential helpline.

Their contact details are as follows:

Helpline: (020) 3117 2520

E-mail: whistle@protect-advice.org.uk

Website: www.pcaw.org.uk

► 6.0 PRESERVATION OF RESOURCES

6.1 WATER USE

It shall be ensured that operations do not negatively affect access to safe water for the community. Suppliers employ water management strategies to ensure that they are making water savings wherever possible and report on the steps they have taken in line with the single use plastics policy.

6.2 PRINTED MATERIALS

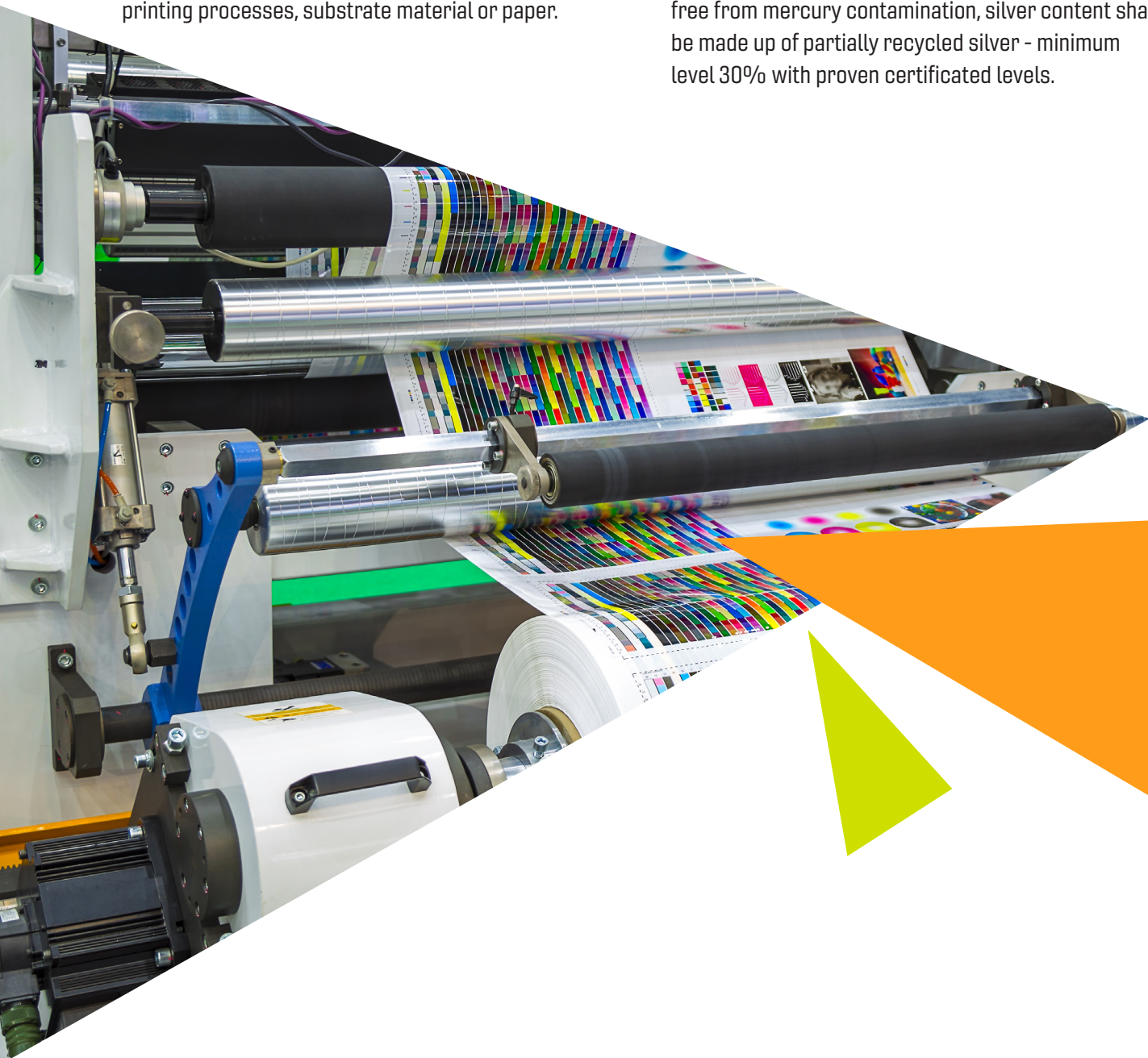
Where printed material is required, efforts are to be made to minimise the environmental impact of the printing processes, substrate material or paper.

6.3 TEMPORARY EQUIPMENT

Rental of equipment is considered before purchasing of temporary equipment, to reduce the consumption of resources used in the item's life cycle. Appendix A – Decision Process for Temporary Materials shall be applied when making decisions regarding temporary materials.

6.4 PRECIOUS METALS

Procurement of precious metals shall be sourced from Fair Trade or Responsible Jewellery Council (RJC) members or equivalent. Gold content shall be free from mercury contamination, silver content shall be made up of partially recycled silver - minimum level 30% with proven certificated levels.



► 7.0 PRESERVATION OF BIODIVERSITY

7.1 TIMBER AND FORESTRY PRODUCTS

Timber and forestry products must be reused or recycled materials where possible, or if not, they must be certified under an accepted international sustainable forestry management scheme such as FSC Chain of Custody certification, to provide credible confirmation for products with environmentally and socially responsible sources to access the market. Solid wood packaging imported into the UK must meet ISPM15 standards.

7.2 DEFORESTATION AND LAND USE

Suppliers must adopt an approach to preserving biodiversity and to net zero deforestation and land conversion of High Conservation Values [HCV] lands in their operations and supply chains and ensure land rights are respected.



► 8.0 WASTE MANAGEMENT

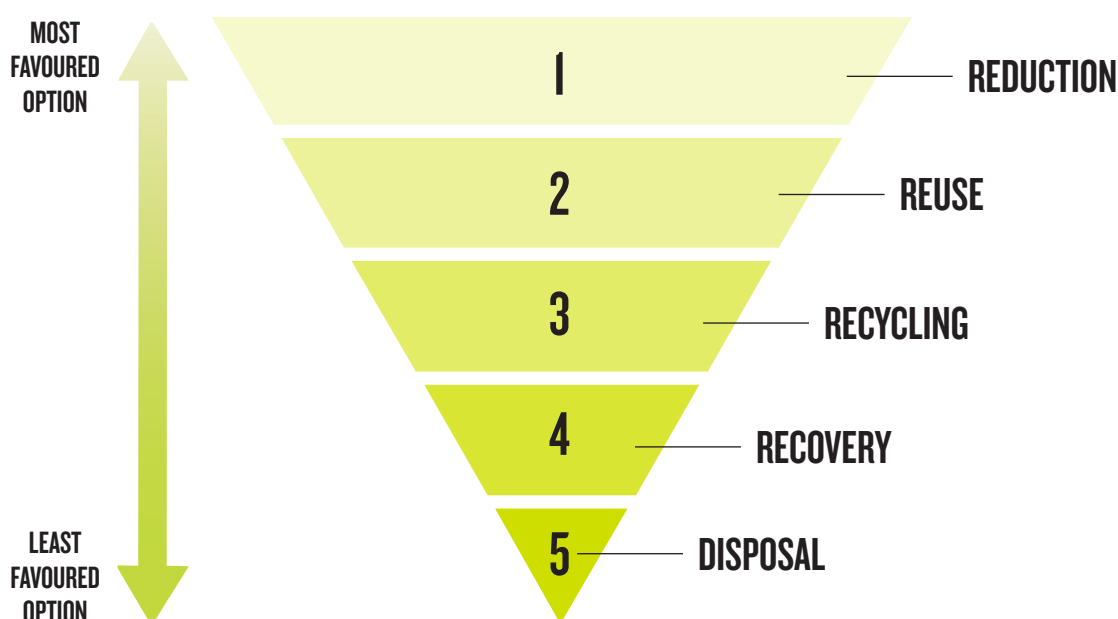
8.1 PRODUCT AND TRANSIT PACKAGING

Suppliers shall work to minimise product and transit packaging in line with the single use plastic policy, and on decreasing the use and types of plastics and increasing the recyclability and recycled content of packaging material supplied. Suppliers are encouraged to contribute to packaging collection, sorting, and recycling solutions to mitigate packaging materials ending up in landfill or as litter.

8.2 THE WASTE DUTY OF CARE

The Waste Duty of Care Code of Practice shall be applied to all waste holders, and it is actively applied at all stages of the waste's journey. The Waste Hierarchy (see below) shall be actively applied to all waste produced, and the most preferred options shall be used unless unfeasible.

In the case where waste management is undertaken overseas by a Supplier controlling their own waste management, the waste regulations for that country must be followed.



► 9.0 POLLUTION PREVENTION

9.1 HAZARDOUS MATERIALS

Hazardous materials, chemicals and dangerous substances shall be safely stored, handled, recycled, reused, and disposed of per manufacturer's recommendations and the guidance of the Health & Safety Executive (HSE).

9.2 CLEANING MATERIALS

Only legally approved chemical substances shall be used. The Supplier is required to reduce the use of chemicals, veterinary residues and fertilisers and exclude the use of chemicals and fertilisers which are hazardous to people's health.

The Supplier must use products that are readily biodegradable.

They must ensure all packaging does not contain any toxic substances.

Suppliers are encouraged to purchase cleaning products in quantities that minimise the amount of packaging required.

9.3 WASTEWATER, CHEMICAL STORAGE AND SPILL PREVENTION

Activities shall not cause the pollution of natural waters, whether intentionally or unintentionally. If applicable, Suppliers will take steps to ensure emergency preparedness in case of a spill event, and have a spill procedure, and will have preventative measures in place to avoid such events.



► 10.0 COMBATING CLIMATE CHANGE AND IMPROVING AIR QUALITY

10.1 TRANSPORT POLICY

Suppliers shall optimise transportation to reduce fuel consumption. Suppliers shall support the OC's pledge to be a Carbon Neutral Games and are encouraged to offset travel and transport related emissions and prioritise low emission transport where possible. They should report on the steps they have taken, and where appropriate report GHG emissions savings because of the steps taken. If requested, suppliers shall also provide transport data relating to delivering products/services to the OC. This may include, but is not limited to, the number of miles/kilometers covered in delivery and the mode of transport used.

10.2 ENERGY

The Supplier shall work at measuring and minimising its direct and indirect greenhouse gases emissions of its different activities and be willing to report this data to the OC on reasonable request. The supplier should also consider less polluting energy as a first option. They should report on the steps they have taken, and where appropriate report GHG emissions savings because of the steps taken.



► STANDARDS AND DOCUMENTS

In compiling the Sustainability Principles and their associated minimum standards, the following standards and documents were used for reference:

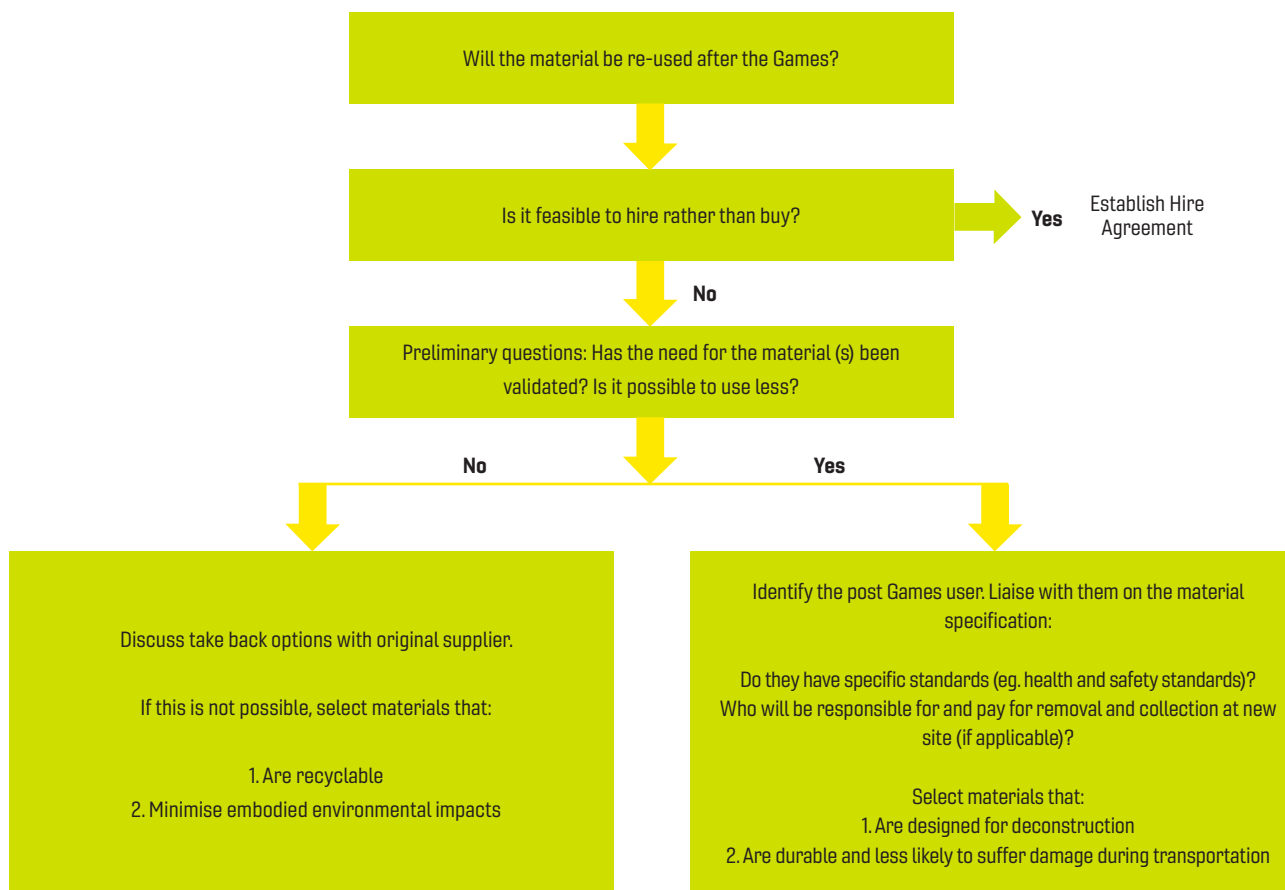
Internationally Recognised Standards

- The Rio Declaration on Environment and Development (UN 1992);
- The Johannesburg UN World Summit on Sustainable Development (UN 2002);
- ISO 14001:2015 Environmental Management system;
- ISO 20121: 2012 Event Sustainability Management System;
- ISO 20400: Sustainable Procurement;
- FAO Voluntary Guidelines on Governance of Land and Land Tenure;
- UN Universal Declaration of Human Rights;
- The ILO Declaration on Fundamental Principles and Rights at Work;
- The UN Guiding Principles on Business and Human Rights;
- The UN Women's Empowerment Principles;
- The UN Human Right to Water and Sanitation;
- Children's Rights and Business Principles;
- The Global LGBTI Standards for Business;
- The UN Global Compact;
- The Ethical Trading Initiative Base Code;
- The OECD Guidelines for Multinational Enterprises;
- Department of Health Food Standards Guidelines
- The Waste Duty of Care: Code of Practice
- The UN Sustainable Development Goals

Commonwealth Games Documents

- Birmingham 2022 Flavours of the Commonwealth
- Birmingham 2022 Equal Opportunities, Diversity and Inclusion Policy
- Birmingham 2022 Anti-Corruption, Counter-Fraud, Bribery, Gifts and Gratuities Policy
- Birmingham 2022 Procurement Policy
- Birmingham 2022 Whistleblowing Policy
- Birmingham 2022 Social Values Charter
- Commonwealth Sport Sustainable Sourcing Code Guidance V1.1
- Corporate Health and Safety Policy
- Equal Opportunities, Diversity and Inclusion Policy
- Birmingham 2022 Accessibility and Inclusion Commitment
- Birmingham 2022 Sustainability Pledge
- Birmingham 2022 Single Use Plastic Policy

► APPENDIX A – TEMPORARY MATERIALS DECISION MAKING



The following further information is provided as accompanying guidance to this decision-making process:

Recyclable materials: the most easily recyclable materials are in their raw forms. That is, without finishes or composite components that will limit or add costs to the recovery of the raw material in recycling processes.

Minimise embodied environmental impacts:

environmental impacts may occur across a wide variety of impact categories, from GHG emissions to land and water use. A full life cycle assessment is required to properly account for these impacts across the lifetime of the product. If this information is unavailable it is suggested that the decision maker focuses on GHG emissions as a proxy for overall impacts. Therefore, products that are produced with processes that use less energy than average and/or use less energy in operation should be given preference.

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