

Vision

Subway believes safe and quality food comes from healthy farm animals that are bred, raised, transported and slaughtered with high standards for animal welfare. Together with our suppliers, we aim to provide our customers with safe and quality food without compromising animal welfare practices recommended by the best available science.

Issue Context

Subway takes the issue of animal welfare seriously and believes that this is an essential component of our commitment to responsible sourcing. Strong animal welfare standards serve to ensure the health and welfare of the farm animals and therefore contribute to the health and well-being of our guests, society, and environment.

Our guests and our stakeholders expect Subway sourcing practices to reflect the highest quality and safety standards and Subway's animal welfare policy outlines our commitment to procure products and ingredients in the most responsible manner possible.

Principles

Animal welfare is an evolving issue with ongoing research on practices that have the highest welfare outcome potential for farm animals. Subway is committed to continued engagement with our guests and expert stakeholders toward ensuring our animal welfare policy is current with the recommendations of scientific research and stakeholder expectations.

Our animal welfare policy is founded on the five freedoms principles proposed by the Farm Animal Welfare Council (FAWC) on the protection of animals kept for farming purposes.

The Five Freedoms are:

- **Freedom from Hunger and Thirst - by providing ready access to fresh water and a diet to maintain full health and vigor.**
- **Freedom from Discomfort - by providing appropriate environment including shelter and a comfortable resting area.**
- **Freedom from Pain, Injury or Disease - by ensuring prevention or rapid diagnosis and treatment.**
- **Freedom to Express Normal Behavior - by providing sufficient space, proper facilities and company of the animal's own kind.**
- **Freedom from Fear and Distress - by ensuring conditions and treatment which avoid mental suffering.**

Meeting these freedoms is essential in order to avoid suffering and poor animal welfare. Subway also recognizes that farm animals should have the potential to express their natural behaviors and undergo positive experiences. We aspire to work with our suppliers to ensure their animals are afforded these opportunities.

Subway acknowledges that enhancing the health and welfare of the farm animals in our supply chain is a journey and we will work with our vendors and business partners to achieve progress against our commitments. We will partner with suppliers to enable long-term improvements in animal welfare practices in alignment with our commitments, and we will give purchasing preference to suppliers that demonstrate a commitment to our animal welfare principles and expectations.

Scope of Policy

Our Franchisee-owned Independent Purchasing Cooperatives and Companies (IPCs) are responsible in most countries for procuring the products and ingredients used in Subway restaurants. While Subway and its Franchise Owners do not own or manage businesses engaged in animal production, these guidelines serve to direct the IPCs' purchasing strategy and outline to Subway guests and suppliers our global sourcing practices for land-animal proteins.

The Subway Animal Welfare Policy is intended to address a range of key farm animal welfare issues for our global land-animal protein supply chain, including eggs, broiler chickens, pork, beef, turkey, and dairy products. A separate Subway Antibiotics Policy addresses our general approach to managing antibiotic use in our land-animal supply chain as a matter of public health and antibiotic-efficacy in humans, and a separate Subway Sustainable Seafood Policy addresses our approach to sustainable and responsible sourcing of seafood.

The Subway Animal Welfare Policy accounts for varying key issues across all farm animals being raised for Subway's supply chain and seeks to address stakeholder concerns regarding:

- **Close Confinement**
- **Genetic Modification**
- **Barren Environments**
- **Growth Promotion**
- **Routine Mutilations**
- **Slaughter Practices**
- **Farm Animal Transportation**

The Subway Animal Welfare Policy outlines our broad objectives for time-bound action against animal welfare commitments based on stakeholder expectations. These objectives represent aspirations to provide our customers with products and ingredients from animals that were raised with improved welfare practices that exceed local laws and regulation, and our commitments against these objectives are noted on our website.

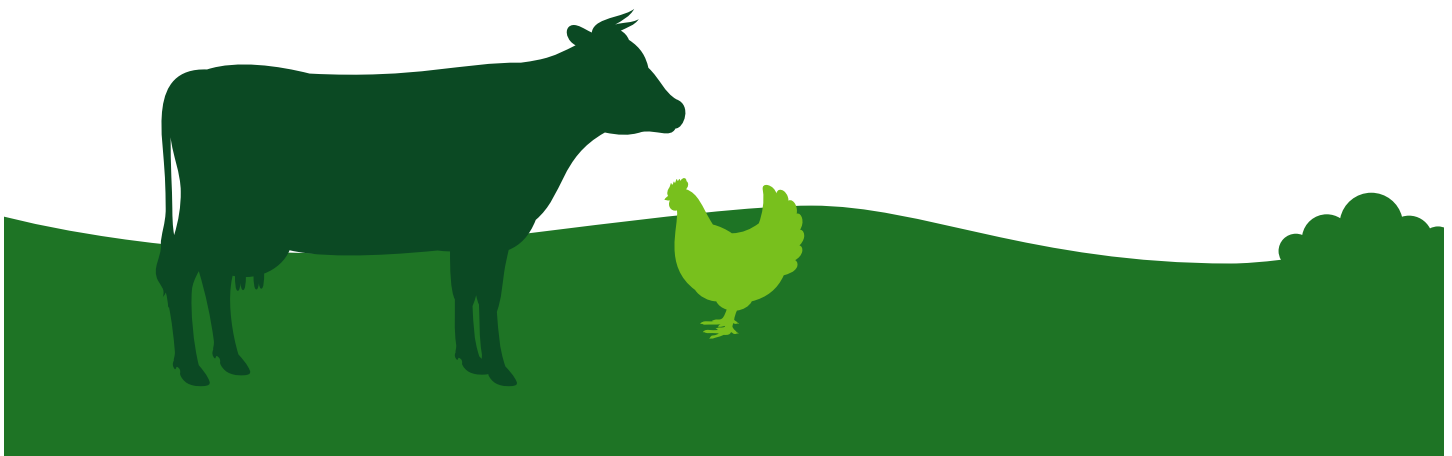
The policy also describes our global practices to manage, measure, monitor and report on our sourcing practices against animal welfare objectives and toward achieving our ambition of providing our customers with safe, affordable, and quality foods with uncompromising commitment to the highest animal welfare standards advised by science.

Broad Objectives

This section outlines Subway aspirations across various farm animals being raised for Subway's supply chain and is founded on our core expectations for our suppliers:

- **Suppliers should comply with all applicable local laws and regulations relating to animal production and welfare.**
- **Suppliers should adopt animal welfare policies that ensure their animals are more humanely bred, raised, transported and slaughtered.**
- **Suppliers should undertake staff training to ensure appropriate management of animals and satisfaction of animal welfare expectations.**
- **Suppliers should immediately alert their IPC partner of any instances of abuse or non-compliance.**

Subway commits to working with our suppliers to attain and maintain third-party animal welfare certifications in order to verify and validate their practices.





Laying hens (eggs)

Subway aspires that its egg supply chain upholds ethical standards in the raising of laying hens.

Subway aspires that animal welfare considerations are integrated in all aspects of the production process and specifically focused on issues of housing and confinement, genetic selection of breeds, routine mutilations, feeding practices, and male chick culling.

Poultry (broiler chickens & turkey)

Subway aspires that its poultry supply chain aligns with stakeholders' expectations for animal welfare practices in the production of broiler chickens and turkeys.

Subway seeks animal welfare considerations to be integrated in all aspects of the production process including breed selection, stocking density, environmental enrichments, and slaughter practices.



Pork

Subway aspires that its pork supply chain meets stakeholders' expectations and we expect pigs in our supply chain to be treated to a high standard of animal handling and care throughout their life.

Specifically, we aspire to have a pork supply chain that is considerate of animal welfare concerns relating to gestation and farrowing crates as well as other confinement systems, practices of routine mutilations such as tail docking and needle teeth clipping, and access to outdoor or deep-bedded environments if raised indoors.



Beef & dairy cattle

Subway aspires that its beef and dairy supply chain meet stakeholders' expectations. The company seeks for cattle to be raised with practices that address animal welfare concerns, such as restricting the use of artificial growth hormones, routine mutilations such as de-horning or tail-docking, access to pasture, and meeting expectations for humane slaughter practices.



The Subway® Animal Welfare Policy applies to our entire global operations.

Measurement & Monitoring

Subway strives to meet our stakeholders' expectations for transparency. We will collect data from our suppliers and report on progress against stated animal welfare commitments. Our current animal welfare commitments, specific to each farm animal category, and progress against these commitments are provided on our website.

Subway will periodically update this policy based on learnings from our reporting process and to ensure this policy is in alignment with our stakeholder expectations and the latest animal welfare science. Our Animal Welfare Working Group, a cross-functional team comprising members from our culinary, supply chain, quality assurance, marketing, and societal impact functions, is responsible for updating our policy periodically, and our supply chain and societal impact functions will provide oversight of the implementation of all related commitments. Any updates will be based on the most recent available science and Subway acknowledges that supplier systems and practices that are fit for purpose and fit for future will be prioritized. We are also committed to working collaboratively with the IPCs, third party subject matter experts, and our suppliers to evaluate emerging and evolving systems and practices to continue to evolve our animal husbandry approach.

Subway has a zero-tolerance policy for animal abuse in our supply chain. We will not work with vendors and business partners who abuse animals or do not comply with local animal welfare laws and regulations. Suppliers are expected to report all suspected animal abuse incidents to authorities. Our suppliers commit to upholding our animal welfare standards when contracting for our business and a supplier's failure to correct or comply carries a range of consequences, inclusive of terminating our business relationship.

We give preference to suppliers that already utilize credible third-party audit programs to ensure animal welfare standards are maintained as part of their own sustainability mission, as we recognize we operate in a multi-tiered food ecosystem that has complexity known best by the supplier. It is for that reason that we push for our partners to build this culture into their practice as a key priority. In the absence of those practices at our partners, we will implement additional third-party audit procedures when necessary.