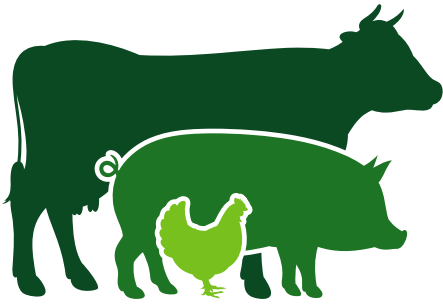


# Global Responsible Use of Antibiotics Policy



## Vision

Subway® believes that where our ingredients come from and how the animals in our supply chain are raised are integral components to preparing great food for our guests. Subway understands that preserving the efficacy of antibiotics is essential to protect human and animal health. We also acknowledge that reducing the unnecessary use of antimicrobials in the raising of farm animals is a critical step toward controlling antimicrobial resistance. Subway joins the global community in advocating for responsible stewardship of antibiotics and is working with our suppliers to find solutions that ensure our high quality and food safety standards are upheld and not compromised in any way.

## Issue Context

Subway takes the issue of antimicrobial resistance seriously and believes that responsible stewardship of antibiotics in the raising of farm animals is an essential component of our commitment to responsible sourcing. Current science concludes that antimicrobial use in food-producing animals can lead to antimicrobial resistance and poses a significant risk to both human and animal health. Responsible stewardship of antibiotics will help preserve the health of the farm animals in our supply chain and safeguard the health of our guests, society, and the environment.

Our guests and our stakeholders expect Subway sourcing practices to reflect the highest quality and safety standards and the Responsible Use of Antibiotics Policy outlines our commitment to procure products and ingredients in the most responsible manner possible.

## Principles

Antimicrobial resistance is an evolving issue with ongoing research on best practices for mitigation and prevention. Subway is committed to continued engagement with our guests and expert stakeholders toward ensuring our policy is current with the recommendations of scientific and medical research.

**Subway is committed to the following principles on antibiotics stewardship within our supply chain:**

- **Antibiotics should never be used to promote animal growth.**
- **Antibiotics should only be used to treat diagnosed disease in animals, and in limited circumstances to control outbreaks if animals are sick.**
  - **Limited circumstances are defined as situations where a veterinarian familiar with the herd or flock has determined that there is high risk of transmission of a specific disease amongst the animals if left untreated.**
- **Antibiotics should never be used for routine disease prevention purposes.**
- **Antibiotics should only be administered when prescribed by a veterinarian.**
- **Suppliers should monitor and report their antibiotics use so that oversight agencies and the public can track progress in meeting use reduction goals and identify resistance risks and trends.**
- **Suppliers should continually improve production processes toward minimizing the need for antibiotics use.**

Animal welfare and antibiotics use are both issues in our supply chain, and the Subway Responsible Use of Antibiotics Policy aligns with our support of the Five Freedoms principles outlined in our Animal Welfare policy. The Subway Responsible Use of Antibiotics Policy should not restrict our supply chain partners in complying with best practices in the raising of farm animals.

Subway acknowledges that reducing the unnecessary use of antimicrobials in the raising of farm animals in our supply chain is a journey and we will work with our vendors and business partners to achieve progress towards our commitments. We will partner with suppliers to enable long-term reductions in antibiotic usage and elimination in alignment with our commitments, and purchase meat and poultry from suppliers that demonstrate a commitment to the Subway Responsible Use of Antibiotics Policy.

## Scope of Policy

Our Franchisee-owned Independent Purchasing Cooperatives or 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.

Subway expects all vendors and business partners to comply with all local laws and regulations regarding antibiotic usage in animal production and with the Subway Responsible Use of Antibiotics Policy.

The Subway Responsible Use of Antibiotics Policy applies to our entire protein supply chain. The policy seeks to align our sourcing practices with World Health Organization (WHO) considerations regarding stakeholders' key concerns surrounding animal antibiotic use: chiefly, the use of antibiotics for routine purposes and the use of medically important antibiotics, as defined by the WHO classification for antibiotics' importance to human medicine<sup>1</sup>.

The Subway Responsible Use of Antibiotics Policy will outline our broad objectives for our animal supply chain. These objectives represent aspirations to provide our guests with products and ingredients that were raised with responsible antibiotic use practices that may exceed local laws and regulation.

1. Critically Important Antimicrobials for Human Medicine – 5th Revision. Geneva: World Health Organization. Updated in June 2017.

The policy also describes our global practices to manage, measure, monitor and report on our sourcing practices against antibiotic use objectives and toward achieving our ambition of providing our guests with safe, affordable, and quality foods with uncompromised commitment to aligning with the global communities' effort to mitigate against antimicrobial resistance.

## Broad Objectives

The Subway Responsible Use of Antibiotics Policy aligns with WHO recommendations to address antibiotic overuse in animal production and aims to achieve the following objectives over time:

- **We will not source any products that have been administered antibiotics, including animal-only antibiotics, for purposes of growth promotion and feed efficiency.**
- **We will prioritize the reduction of all antibiotics classified as “medically important antimicrobials” as defined by the WHO.**
- **Suppliers will be required to administer antibiotics only when prescribed by a veterinarian.**
- **Suppliers will be required to eliminate the use of all classes of “medically important antimicrobials” as defined by the WHO for preventative purposes when disease has not yet been clinically diagnosed.**
- **Suppliers will be required to eliminate the use of antimicrobials classified as “highest priority critically important” for human medicine, as defined by the WHO, for any use in animal production.**

Subway commits to working with our suppliers to transition to production practices that align with our objectives. We expect our suppliers' antibiotic use policies to also align with our stated policy and we will continue to engage farmers, suppliers, and other stakeholders to reduce the use of antibiotics across the industry.





## Subway® Responsible Use of Antibiotics Policy applies to our entire global operations.

### Measurement, Monitoring & Learning

Subway strives to meet our stakeholders' expectations for transparency. We will collect data from our suppliers and report on progress against stated responsible antibiotic use commitments. As time-bound commitments for specific protein categories as well as more detailed prohibitions on specific antibiotics are established, these commitments will be found 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 medical and scientific research on responsible use of antibiotics. Our Antibiotics 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 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 approach to responsible use of antibiotics.

We always expect vendors and business partners to comply with all local laws and regulations including antibiotic use in the raising of farm animals for our supply chain and with the Subway Responsible Use of Antibiotics Policy, when administered through our product specifications. Failure to comply carries a range of consequences, inclusive of ending our business relationship.

We give preference to suppliers that already utilize credible third-party audit programs to ensure responsible use of antibiotics 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.

