

Subway® Statement on Modern Slavery & Human Trafficking

This statement addresses the Modern Slavery Act of the United Kingdom ("UK MSA") and the California Transparency in Supply Chains Act ("CA TISCA"). It outlines our approach for the 2025 fiscal year to preventing modern slavery as defined in the UK MSA and human trafficking as defined in the CA TISCA throughout our organization and supply chain.

At Subway®, we recognize that the prevention and mitigation of modern slavery and human trafficking is a global challenge. Integrity in our operations, products, and supply chain is of the utmost importance.

Our Business

Founded in 1965, the Subway franchise system is a global quick service restaurant brand, serving guests freshly made-to-order sandwiches, wraps, salads and bowls with locations operated by independent franchisees in nearly 100 countries worldwide. There are nearly 37,000 Subway restaurants globally, with over 2,000 locations in the United Kingdom and Ireland within the scope of the UK MSA and nearly 2,000 in the state of California, within the CA TISCA.

In the United States, the Subway® franchise system is licensed by Doctor's Associates, LLC ("DAL") and in the United Kingdom and Ireland, it is licensed by Subway International B.V. ("SIBV"). The global dual headquarters are located in Connecticut and Florida, USA.



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Our Supply Chain

Subway® is a global brand with a matrixed and diverse supply chain and operations. Subway® franchisees purchase goods and services from thousands of suppliers located all around the world. We work with organizations known as Independent Purchasing Cooperatives/ Companies (collectively, the "IPCs") in major regions around the world. The IPCs are franchisee-owned and operated organizations whose mission is to identify goods and services for the Subway® franchise system. In countries that are managed by an independent Master Franchisee, Subway does not manage operations, marketing or supply chain.

While the IPCs and Master Franchisees operate independently of DAL and SIBV and therefore take their own measures to ensure compliance with all applicable laws, we work closely with them to ensure suppliers and their goods and services meet our high standards for quality and safety and are ethically sourced.

Relevant Policies

We utilize a robust supplier approval process in which all approved suppliers must agree to comply with our Vendor Code of Conduct or must otherwise agree that their own practices and policies meet or exceed our own. The Vendor Code of Conduct (the "Code") requires all vendors to comply with laws relating to modern slavery and human trafficking in the countries where they operate and strictly prohibits all forms of modern slavery and human trafficking. The Code also contains sections on both anti-bribery and anti-corruption, as well as a reporting process for any suspected violation of the Code.

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Supply Chain Verification, Certification, and Audits

We are committed to preventing modern slavery and human trafficking in our business and any part of our supply chain. Where possible, we look to build long-term relationships with suppliers which allow us to make our expectations clear, thereby ensuring that our suppliers are aligned with our commitment to the prevention of modern slavery and human trafficking as defined by the UK MSA and CA TISCA, respectively.

Suppliers certify compliance with our Code by contractually agreeing to do so in our Vendor Agreement, which all suppliers providing product to the Subway franchise system must sign. Their agreement to comply with our Code certifies their agreement to the prohibition of modern slavery and human trafficking in their business practices. Supplier's agreement to comply with the Policy also requires their certification that their own suppliers and subcontracts will abide by the terms of the Policy. We may remove any supplier from our system, terminating our contractual relationship with them and notifying franchisees, IPCs, and distribution centers that they may no longer purchase product from that supplier in the instance that a supplier behaves in an unlawful manner or engages in business practices inconsistent with the Code.

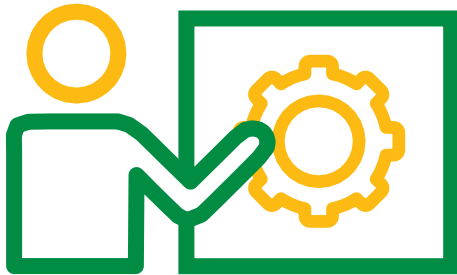
In the United Kingdom, we require all direct suppliers to register with SEDEX, a leading ethical trade organization which works to improve the conditions in global supply chains. Through the partnership with SEDEX, suppliers are required to conduct a risk assessment of their supply chains and report any non-compliance. Some suppliers may be assessed through third-party audits. This data is used to assess business risks and prioritize action accordingly.

Accountability

We expect all employees, franchisees, and suppliers, regardless of cultural, social, and economic context, to respect human rights and treat all people with dignity and respect.

As outlined in the Code and Policy, we have developed a process for any third party to file a complaint regarding modern slavery and human trafficking violations, or any other Code violations, to our Governance and Compliance team at Subway Headquarters. We take every measure possible to ensure the confidentiality of any reports made and do not tolerate any retribution or retaliation taken against any individual who has, in good faith, reported questionable behavior or a violation of the Code or Policy. To report a violation, please visit speakup.subway.com.

We are continually working to improve the avenues by which complaints about possible violations of the Code can be made.



Training

We are committed to raising awareness about modern slavery, human trafficking, and other corporate social responsibility issues in our supply chain. We continue to work to improve awareness and training in these areas and to coordinate with the IPC organization to implement training within procurement programs.

We are currently looking into how we can improve our modern slavery training for internal teams.

In Summary

While the UK MSA and CA TISCA are regionally specific, this statement demonstrates our global ambition to be an active and productive member of our business community, seeking to better understand, prevent, identify and address modern slavery and human trafficking. We understand that the issues surrounding modern slavery and human trafficking are ever-changing, and accordingly, our efforts to improve will continue to adjust and evolve to meet the demands of our complex supply chain. We commit to improving our documentation in this area and to working with other industry leaders and collaborative groups to better understand risk management and support implementation of practices to mitigate the risk of human trafficking and modern slavery in our supply chain.

Signed:

Carrie Walsh
Subway Interim CEO

