Subway Sustainable Packaging Policy

Principles

Subway recognizes that our global footprint, scale and reach have potential to influence the food packaging industry and we aim to leverage our resources to create a positive impact and to be part of the solution.

Subway aspires to reduce our packaging footprint and influence the global packaging industry through the following principles:

• Subway will eliminate unnecessary packaging wherever possible.

• Subway will look for ways to increase the recycled content of our packaging materials and look for opportunities to sustainably source renewable raw materials where recycled content is not possible.

• Subway will design our packaging to fit within the circular economy wherever feasible, designing packaging to be reusable, recyclable, industrially compostable, or fully biodegradable.

• Subway will ensure that all packaging suppliers conform to Subway expectations as expressed in our Supplier Code of Conduct.

• Subway will ensure, where relevant, that packaging suppliers conform to the Subway Deforestation policy to ensure packaging raw materials are sustainably sourced.

Subway commits to working with our suppliers and business partners to support our sustainable packaging principles. We will partner with suppliers to enable continued improvement of our packaging and we commit to considering sustainability during packaging procurement. Subway will also work within our communities and with industry partners to enable responsible recovery of Subway and other food packaging materials.

Vision

Subway packaging plays an important role in protecting the quality of our products and enhancing the Subway guest experience, and we aspire to reduce the environmental impact of our packaging to align with our sustainable sourcing practices and to participate in the circular economy.

Issue Context

At Subway we design our packaging to meet many criteria, including product freshness and quality, affordability, and guest convenience. As we recognize that packaging has associated social and environmental impacts throughout its lifecycle, we also consider sustainability attributes during packaging design and procurement. This means looking for ways to design, produce, transport, store and responsibly dispose of packaging while using fewer materials and reducing waste throughout the value chain.

Globally, Subway sources large quantities of food packaging containers and we recognize that our packaging supply chain can have significant environmental impacts, as can the disposal of our packaging materials. We remain committed to ensuring our principles for sustainable packaging are observed throughout the entire life cycle of our packaging and we strive for all of our packaging materials to contribute to the circular economy from design to disposal.
Scope of Policy

Our Franchisee-owned Independent Purchasing Cooperatives or Companies (IPCs) are responsible in most countries for procuring the packaging used in Subway restaurants. While Subway and its Franchise Owners do not manage businesses engaged in packaging solutions, these guidelines serve to direct IPCs purchasing strategy and outline to Subway guests and suppliers our global packaging procurement practices. Subway expects all vendors and business partners to comply with local laws and regulations for both packaging and waste management.

The Subway Sustainable Packaging Policy applies to all Subway global operations. These objectives represent aspirations to provide our guests with safe and affordable packaging options that do not compromise our commitment to sustainable sourcing. Subway reserves the right to modify these objectives and commitments based on the most recent available science and changes in packaging technologies.

The policy also describes our global practices to manage, measure, monitor and report on our sourcing practices against our policy objectives toward achieving our ambition of reducing the environmental impact of our packaging and contributing to the circular economy.

Broad Objectives

The Subway Sustainable Packaging Policy aspires to eliminate unnecessary packaging and source packaging materials with utmost consideration of social and environmental impacts. The policy is founded on the following broad objectives for sustainable packaging:

- Eliminate the use of any unnecessary packaging
- Increase the use of recycled content and sustainably sourced raw materials from renewable sources
- Ensure all paper-based packaging conforms with our Deforestation Policy
- Promote the use of materials that can be recycled and/or composted in an industrial composting facility
- Reduce the carbon footprint of our packaging across the product lifecycle
- Ensure all sustainable packaging in no way compromises our in store operations, our customers’ experiences, the safety or quality of our food products or the health of our employees and consumers

Measurement & Monitoring

Subway strives to meet our stakeholders’ expectations for transparency. We will collect data from our suppliers and report on progress against stated packaging principles and commitments 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 scientific research on sustainable packaging. Our Sustainable Packaging 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 sustainable packaging.

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