

PASSENGER

Modern Slavery Statement

2025



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Statement from our CEO

I’m incredibly proud of how far Passenger has come in its short history, from a brand with beginnings in the back of a campervan in the wilds of the Pacific Northwest, to an international business seeing exceptional growth across multiple markets. And all whilst maintaining our core values and founding principles of being a responsible brand rooted in escapism through connections, well-being and nature.

Since 2012, we have grown to employ over 90 people, partnering with dozens of UK and international retailers and shipping thousands of products to customers all over the world. This growth has involved us becoming more formal in our standards and processes, and this report highlights some of those efforts in our supply chain.

Since day one, we have thought about our wider commitments and our impact with much of our oversight led by our founder, Rich. In 2023, we appointed a new Head of Environmental, Social and Governance (ESG) to oversee our efforts to improve our impact and reduce our footprint, and to take responsibility for managing human rights and modern slavery risks in the business.

This was the first dedicated ESG role in the business, and has meant we have improved our systems and processes, evaluated our impact, and been more consistent and robust in the way we apply our agreed standards. Though our business and our ESG programme are still relatively young, we are deeply committed to improving our performance in all aspects of our ESG strategy and are dedicated to transparency in our reporting.

Our aim is to act as a flywheel, to enable improvements in standards and practices wherever we have influence. We’re committed to partnering with suppliers for the long term to ensure mutual growth and benefit for us, our suppliers, and the workers within our supply chain.

Our first Modern Slavery report outlines our progress on this mission so far. We hope to share more details and case studies of our process in action in future reports.

Jon Lane
CEO, Passenger



About Passenger

Passenger is a brand rooted in passion and purpose. Born on the roam in 2012, it started as an idea thawed by the fireside, in between the waves and trees of the Pacific Northwest. Salty-skinned with beer in hand, our founder Rich Sutcliffe, and his now wife Alexa, longed for a different way of life. Their love of escapism led them to start Passenger, creating responsible outdoor gear meant for a life of meaningful escapism.

We design clothing and accessories to help people spend more time pursuing adventure and meaningful escapism, with responsibility at the core of all our decisions. For every order, we plant a tree, and we use lower-impact materials such as recycled cotton and polyester, organic cotton, and responsibly sourced viscose in over 74% of our range.

Passenger is committed to working with our suppliers to develop long-term partnerships dedicated to responsible business practices and continuous improvement. We demonstrate our commitment through our purchasing practices, by being as transparent as possible in our forecasting, negotiations, and delivery of our critical path. We've come a long way in our short history, and we know there will always be more to do as we work even closer with our suppliers.

This is Passenger's first Modern Slavery report. It covers our status for our financial year January to December 2024. It meets the requirement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and we will utilise our new statutory obligations to share our progress.



Our Business Structure

Passenger is a private company, limited by shares and registered in England and Wales. At the end of our reporting year 2024, we had a headcount of 103 people, all of whom are directly employed by Passenger or an EU / US employment agency. We currently have no directly employed seasonal roles in our business. Further information about company structure, turnover and headcount can be found in our annual report and accounts.



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Our Progress in 2024

- Launch of a revised Supplier Handbook, with detailed Code of Conduct based on the ETI Base Code
- Supply chain mapping and product footprinting of 100% 2023 intake in partnership with Fairly Made
- Due diligence assessments at 100% of our Tier 1 sites, with active Corrective Action Plans in place to support necessary improvements
- New supplier onboarding standards rolled out to ensure ‘right first time’ checks and clear expectations for all new suppliers
- Company-wide training on ESG standards and processes, including due diligence process for supplier sites



Non-Product Supply Chain

All of the seasonal or indirectly employed workers within our business are within our 3rd party logistics provider (3PL), who manage our warehouse and customer shipping. This 3PL is responsible for hiring and managing staff to meet our business needs, and it utilises agency and seasonal workers to manage peaks in demand and absenteeism. Due diligence checks with our 3PL show they're undertaking biannual ethical assessments on their two labour providers, according to the Association of Labour Providers' CORE standard.

Product Supply Chain

Our supply chain is made up of goods for resale suppliers, 6 of which are agents, and 23 of which are '1st tier' factories or factory groups. Our 1st tier sites are located in China, India, Vietnam, Sri Lanka, Indonesia, Turkey, Morocco, Lithuania and Portugal.

We have several branded suppliers that are registered in the UK and manage their own manufacturing bases. We do not include these branded suppliers in our supply chain risk assessment or due diligence programme due to the reduced leverage and control we have over their supply chains. We do complete topline due diligence checks on these partners to ensure that their own management systems are robust before partnering with them.

We have sought to map our '2nd tier' supply chain via responsibly sourced material certification. We have also worked with Fairly Made to map our deeper supply chain along with completing Life Cycle Assessments on our products. This process has identified Tier 2 and 3 sites, which we continue to assess via our due diligence process. We expect visibility to improve as we complete our 2nd year of supply chain assessments with Fairly Made.



Policies in Relation to Modern Slavery

Passenger has adopted the Ethical Trading Initiative Base Code, which we have augmented to include requirements around subcontracting, environmental protection and transparency. The ETI Base Code is a recognised standard that has been developed to include international labour requirements and the UN Guiding Principles on Business and Human Rights. It includes clauses on forced labour, child labour, working hours and freedom of association.

We communicate our Code of Conduct with all suppliers via our Supplier Handbook, which has been reissued and circulated to all existing and new suppliers in March 2025. We have asked all suppliers and 1st tier factories to sign the Code of Conduct to indicate that they have read and understood the requirements and commit to abiding by them.

Agreement with and adherence to the Code of Conduct is also required in the Passenger Supplier Contract, which contains information about some of the topline due diligence steps we undertake as detailed below.

In addition to our supplier requirements, we also cover Anti-Slavery and Human Trafficking within our Staff Handbook to ensure that those who have contact with suppliers, factories, 3rd party brands or partners are aware of the risks present and our responsibility as a brand to assess and follow up on these.



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Risk Assessment, Prevention and Mitigation

Based on the locations of our business activity and ability to influence change across different areas of our business, we have concluded that the most salient risk to our business is present in our goods for resale supply chain. However, we will continue to monitor risk in our broader activities and engage with our partners on managing their own risk. The main focus of this activity will be in our 3PL, where we know there are seasonal workers.

We have completed a desk-based risk assessment of our supply chain to identify the potential risks of modern slavery and other breaches of human rights and labour rights in our supply chain. This assessment utilised open-source information about human rights risks in supply chains from sources such as the Walk Free Global Slavery Index and the US Department of State Country Reports on Human Rights Practices. This risk assessment indicates that the greatest risk of modern slavery exists in our deeper supply chain, in material processing and agriculture for materials such as cotton. We have prohibited the use of cotton from sources where modern slavery is known to be prevalent such as Uzbekistan, Turkmenistan and China. Our data mapping indicates that most of our cotton is sourced from India and Pakistan.

Our partnership with Fairly Made also enables access to modern slavery risk assessment via their investigation and checks process. This enables us to be alerted to any potential issues in our supply and we can undertake the remedial action required.

Passenger is working cross-functionally to improve our purchasing and other processes to ensure suppliers are managed well and provided with sufficient information, support and time to operate in a responsible way. We are in the midst of a comprehensive supply chain mapping and assessment process to secure commercial relationships with our fabric, yarn, trim and packaging suppliers. We anticipate that these efforts will improve visibility and risk mitigation in the supply chain as well as improving our commercial business KPIs.



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Due Diligence Processes

We have initiated a 1st tier factory assessment process to measure factories' performance against the Passenger Code of Conduct and prioritise follow-up against issues raised using a grading system. We use global social compliance audits to complete an initial assessment of our 1st tier sites. At this stage we have accepted many different types of social compliance audit, including SMETA, BSCI, SCLP and SA8000. This is the first step for us to understand the issues present in our supply chain. We are streamlining the process so that we accept only 1 or 2 audit standards (likely SMETA and BSCI) and have restricted the accepted audit scope to ensure only semi-announced or unannounced audits are accepted.



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We define our audit outcomes as:

Status	Example Issue	Business Outcome
Business Critical	Child or forced labour present, risk to life or limb etc.	Existing orders are suspended until a Corrective Action Plan (CAP) is agreed and progress is being made. New sites are not added to the supply chain while issues are open.
Critical	Systematic failures in areas such as pay, hours, H&S management, environmental management etc.	Dedicated information and support is offered via a time-bound CAP. Future orders are dependent on progress. New sites are not added to the supply chain while issues are open.
Major	Isolated issues in Code of Conduct areas or poor management systems	Time-bound CAPs are agreed and sites required to share updates.
Major	Occasional failures to implement systems or missing policies that don’t affect worker experience	Time-bound CAPs are agreed. Progress is measured in future audits.



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We have provided feedback to all 1st tier factories that have issues we consider to be Critical, and requested time-bound corrective action plans (CAPs) from them. We continue to monitor progress against these CAPs and engage with factory management, our suppliers and relevant 3rd parties to support meaningful and sustainable improvements.

In some cases we have begun collaborative engagement with factories in partnership with other brands. We have shared audit costs and CAP follow up with one factory in Turkey, where there were issues around annual leave entitlement and working hours amongst security guards. We engaged with the respected factory improvement consultancy The Re:Assurance Network to complete a verification assessment, and were able to confirm that the original issues had been rectified by the factory. This meant we could continue to bring the factory into the Passenger supply chain, and they continue to successfully deliver part of our sweatshirts range.

We have also engaged with a fellow multi-national outdoor retailer on issues in a proposed site in Ethiopia and a UK apparel brand regarding working hours at an established supplier for our fleece in Vietnam.

This collaboration and deeper due diligence process, as well as improvement support for factories, is crucial to ensuring that we partner with suppliers that share our values. It has enabled us to avoid suppliers that are too high risk for us to engage, as well as onboard suppliers where we already have evidence of their commitment to improve conditions.

This ‘right first time’ approach to onboarding also extends to responsibly sourced material certification, which supports our efforts to formalise the deeper supply chain and enable due diligence at tier 2 and below. During 2024 we engaged with one proposed site in Thailand where payments to security workers raised a concern about their employment status. We’re continuing to engage with the management of this site to resolve this issue and ensure that the workers in question are properly employed before we progress any partnership with them.

We expect to continue working with The Re:Assurance Network in the future, both to complete more robust 1st tier factory assessments as well as due diligence deeper into our supply chain as we gain more visibility.



Effectiveness and KPIs

We continue to track our manufacturing partners based on their performance against the agreed CAPs, and have reduced the total % of sites we deem Critical by 44% in the 2024 financial year. The overall % of sites that we deem Critical will fluctuate based on broader sector issues and market forces, but we anticipate being able to keep the % at its current level through our advisory programme for CAPs.

Any issues that present as a risk to Modern Slavery or might be symptoms of such issues are routinely flagged as Critical in our process. There are also other issues that we would deem Critical, such as extreme working hours or underpayment of wages. There are no active sites in our supply chain where issues that are related to Modern Slavery are present. We of course continue to monitor performance in this area, as well as streamline our assessment programme to improve its efficacy with each season.

As we progress we plan to expand our assessment process to more rights-based approaches to factory engagement, as well as connecting with our tier 2 suppliers and beyond. We'll continue to gather intelligence from our supply chain partners such as The Re:Assurance Network and Fairly Made to augment the horizon scanning and risk assessment efforts we're undertaking.



Training and Capacity Building

We undertook topline ESG training with all members of the Passenger team in August 2024, and have engaged with our Sourcing team to increase their understanding of supply chain issues, especially where these pose a Modern Slavery risk or represent Critical issues for workers.

We’re actively engaging with existing and proposed suppliers to prioritise improvement actions via our CAP engagement process.

We’ll continue to expand our formal training activity over the coming year across the business.