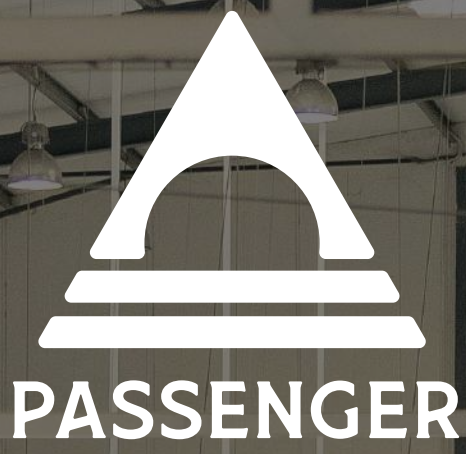




Modern Slavery Statement

2026



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Statement from our CEO



Statement from our CEO

Passenger has always been a brand focused on passion and purpose. Thought up in 2012 by our founder Rich Sutcliffe and partner Alexa, Passenger is a response to the pull to get off grid; to wander, travel and connect with good folk and the great outdoors. This has been our focus since day one – asking our customers, when is it they feel most alive? What is it that recharges them? We call this pursuit of mental and physical wellbeing ‘meaningful escapism’, and it’s the purpose and power behind our brand.

Since then, we have grown to employ nearly 100 people, serving dozens of UK and international retailers and shipping thousands of products to customers worldwide. This growth has involved us becoming more formal in our standards and processes, and this report highlights the delivery of those efforts in our supply chain.

Passenger is committed to working with our suppliers to develop long-term partnerships dedicated to responsible business practices and continuous improvement. Our growth and focus

on improved processes have meant some changes in our supply chain over the course of 2025, where new suppliers have been onboarded to meet our business needs. These new partners join a core set of manufacturers that have been with us for over half the brand’s lifetime and continue to grow with us today.

Our aim is to act as a catalyst, 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. We plan to measure this impact so we can share lessons from our journey in the future.

In our second Modern Slavery Report, we outline our ongoing progress and detail our approach to resolving the issues uncovered during the rollout of our due diligence process.

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.

Since 2023 we've had in-house expertise leading our efforts to improve our impact and reduce our

footprint. Our Head of ESG reports directly to the Chief Executive Officer and is responsible for managing human rights and modern slavery risks in the business.

Our approach for the past 3 years has been to improve our systems and processes, evaluate our impact and be more consistent and robust in the way we apply our standards. We are deeply committed to improving our performance in all aspects of our ESG strategy and are dedicated to transparency in our reporting.

This is Passenger's second Modern Slavery report. It covers our activity for our financial year January to December 2025. It meets the requirement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.



Our Business Structure

Passenger Clothing Ltd. is a private company, limited by shares and registered in England and Wales. We are primarily a digital direct-to-consumer (DTC) brand. We also sell via strategic retail partners such as Cotswold Outdoor Group and Tiso in the UK, and Bergfreunde and Globetrotter in the EU. At the end of our reporting year 2025, we had a headcount of 93 people, all of whom are directly employed by Passenger or an EU employment agency. Contract terms are set by Passenger and all ID / right to work checks are completed centrally. Payments are made directly into verified personal bank accounts.

At the end of 2025, we had one directly employed seasonal role in our business. This was situated in our Customer Service team and supported our customers dealing with purchase, product and return queries during our peak season. All the usual pre-employment checks were undertaken, and we continue to be in touch with this employee after their contract period ended.

During 2025 we also engaged 10 contractors to support business strategy and product development projects. These contractors are not formally employed by Passenger but are

subject to rigorous pre-engagement due diligence checks. Three of these contractors continue to support projects on behalf of Passenger. Further information about company structure, turnover and headcount can be found in our annual report and accounts.

Any remaining seasonal or indirectly employed workers within our business are within our 3rd party logistics providers (3PL), who manage our warehouses and customer shipping. We have one 3PL in Yorkshire, which 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 this UK 3PL show they're undertaking biannual ethical assessments on their two labour providers, according to the Association of Labour Providers' CORE standard.

In 2025 we opened an additional 3PL warehouse in Germany to service our EU and European customers. This 3PL is also responsible for hiring and managing staff directly, using agency and seasonal workers as needed to meet our business demand. Our Warehouse operators are using mature regulatory and voluntary due diligence standards to mitigate the risk presented by the use of agency and seasonal workers.



Our Progress in 2025

- Publishing our Code of Conduct and other supply chain policies on the Passenger-Clothing.com website
- Certification of our Active down-filled jackets to the Textile Exchange Responsible Down Standard
- Achieving a 'Bronze' grading in our first EcoVadis assessment
- Adding available supply chain mapping and product environmental footprinting data to product pages, in partnership with Fairly Made
- Implementation of online supplier on-boarding system across our Tier 1, Tier 2 and nominated material suppliers



Passenger's Supply Chain

The Passenger supply chain is made up of goods for resale suppliers, three of which are agents (down from six in 2024), and 37 of which are '1st tier' factories or factory groups (up from 23 in 2024). Our 1st tier sites are located in China, India, Vietnam, Cambodia, Thailand, Turkey, Morocco and Portugal. Our supply chain map has changed over the course of the year, with more partners in Turkey, India and Vietnam replacing some that we no longer use in China.

We have continued to map our '2nd tier' and deeper supply chain via direct mapping and registration activity, responsibly-sourced material certification and supply chain assessments. This process has identified

105 2nd tier sites (up from 88 in 2024), and 37 'tier 0' nominated and registered material and trim suppliers, all of which have been formally onboarded into our supply chain with a due diligence assessment.

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 top-line due diligence checks on these partners to ensure that their own management systems are robust before partnering with them.



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 April 2026. 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 2025, we also published our Code of Conduct on our company website to ensure our customers are aware of our commitment to supply chain labour standards.

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.



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 3PLs, where we know there are seasonal workers.

We 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 utilises 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 Turkmenistan and China. Our data mapping indicates that most of our cotton is sourced from India and Pakistan. We have some recycled cotton that is sourced from China, which we are investigating while we strategically cease cotton sourcing from that supply chain.

Our partnership with Fairly Made also enables access to modern slavery risk assessment via their investigation and checks process. While there have been no alerts of links to known modern slavery risks in 2025, we continue to monitor the supply chain and will respond appropriately to any future risks.

During our onboarding checks for a new manufacturing site in Thailand, we identified non-compliances that could have been caused by insecure, indebted or bonded labour. These related to the employment conditions of security



workers who were engaged via a separate security company but worked onsite at the manufacturer. The issues included long working hours, failure to record wages correctly, failure to sign contracts with the workers and failure of the security company to properly register with the appropriate agencies in Thailand. We paused the onboarding process until the manufacturer and the security company completed a corrective action plan that was jointly agreed by all parties, and then verified via a follow up 3rd party assessment. All such steps were completed in the 2nd quarter of 2025, so the site was onboarded into the Passenger supply chain. We continue to monitor the site via our 3rd party audit process.

Passenger continues to work 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 did strategically exit a number of manufacturing sites in China and Vietnam during 2025. Some of these were due to the closure of the facilities themselves and others due to the sites being unable to meet our quality, improvement or responsible materials standards. All exits were managed over a period of seasons to ensure the sites and suppliers had time to onboard new customers and maintain production output and employment levels.



Due Diligence Processes

We have continued to implement a robust factory assessment process for our 1st tier manufacturing sites, to measure factories' performance against the Passenger Code of Conduct and prioritise follow-up against issues raised using our established issue grading system. We use global social compliance audits to complete an initial assessment of our 1st tier sites. We continue to accept many different types of social compliance audits, including SMETA, BSCI, SLCP and SA8000. However, we are moving our suppliers towards a more streamlined set of audit standards as our partners renew or choose to undertake different audits. This is so that we can improve our understanding of risk and unify the data management process. We have restricted the accepted audit scope to ensure only semi-announced or unannounced audits are included in our risk assessment process at tier 1.

We have provided detailed 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.

We have engaged with a fellow UK brand on issues that came to light in a shared Vietnamese fleece manufacturer. These relate to long working hours, so we jointly engaged the respected supply chain improvement consultancy The Re:Assurance Network to support improvements at the site. The factory management and supplier continue to engage in this process in a positive way, and we have been able to verify a 27% reduction in monthly overtime hours since we started engaging with the factory.

This type of supply chain due diligence, support for corrective action and industry collaboration is crucial to ensuring that we partner with suppliers that share our values and make a meaningful difference to the working lives of workers in our supply chain.



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 24% in the 2025 financial year. The overall % of sites that we deem Critical will fluctuate based on broader sector issues and market forces. We anticipate the % of Critical sites remaining at its current level or reducing slightly 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 streamlining our assessment programme to improve its efficacy with each season.

We still plan to expand our assessment process to more rights-based approaches to factory engagement, as well as continuing to map and engage 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 already undertaking.



Training and Capacity Building

New hires are provided with introductory training on the Passenger ESG approach, which includes our due diligence and supply chain assessment process. We also support internal business reporting on a quarterly basis, which enables deeper discussions on supply chain risk and the nature of non-compliances in manufacturing settings.

We continue to engage 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 also actively engaging with existing and proposed suppliers to prioritise improvement actions via our CAP engagement process.

We'll look to repeat previous cross-functional ESG training over the coming year as our activity in the supply chain deepens into lower tiers.