

Company Name The Gap Inc
Industry Apparel (Supply Chain only)
UNGP Core Score (*) 18.5 out of 26

| Score | Out of | For indicators |
|---|-----------|--|
| Governance and Policy Commitments | | |
| 2 | 2 | A.1.1 Commitment to respect human rights |
| 1.5 | 2 | A.1.2 Commitment to respect the human rights of workers |
| 2 | 2 | A.1.4 Commitment to engage with stakeholders |
| 1.5 | 2 | A.1.5 Commitment to remedy |
| Embedding respect and Human Rights Due Diligence | | |
| Embedding respect | | |
| 2 | 2 | B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions |
| Human Rights Due Diligence (HRDD) | | |
| 1.5 | 2 | B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts |
| 2 | 2 | B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) |
| 1 | 2 | B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action |
| 0 | 2 | B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts |
| 0.5 | 2 | B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed |
| Remedies and Grievance Mechanisms | | |
| 1.5 | 2 | C.1 Grievance channels/mechanisms to receive complaints or concerns from workers |
| 1.5 | 2 | C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities |
| 1.5 | 2 | C.7 Remedying adverse impacts and incorporating lessons learned |
| 18.5 | 26 | |

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| A.1.1 | Commitment to respect human rights | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: In its Human Rights Policy the Company states: 'We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We expect our business partners, including suppliers, to adopt and adhere to similar values.' In addition to this, the Company website indicates: 'We support the principles contained within...the UN Global Compact; the OECD Guidelines for Multinational Enterprises'. [Human Rights Policy, June 2020 Update, 06/2020: gapinc.sustainability.com] • Met: UNGC principles 1 & 2: See above • Met: UDHR: See above <p>Score 2</p> <ul style="list-style-type: none"> • Met: OECD: See above |
| A.1.2 | Commitment to respect the human rights of workers | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: In its Human Rights Policy the Company states: 'We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights [...] and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.' In addition to this, the Company website indicates: 'We are proud to support the principles outlined in the Universal Declaration of Human Rights (UDHR), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO's core conventions.' [Human Rights Policy, June 2020 Update, 06/2020: gapinc.sustainability.com & Respecting human rights 2020 update, N/A: gapinc.sustainability.com] • Met: UNGC principles 3-6: The Company's website indicates: 'We are proud to support the principles outlined in the Universal Declaration of Human Rights (UDHR), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO's core conventions.' [Respecting human rights 2020 update, N/A: gapinc.sustainability.com] • Met: Explicitly list ALL four ILO for AP suppliers: In its Human Rights Policy the Company states: 'We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights [...] and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We expect our business partners, including suppliers, to adopt and adhere to similar values.' Moreover in its Code of Vendor Conduct, which sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc., the Company indicates: 'This Code is based on internationally accepted labour standards and guidance, including the International Labour Organization (ILO)'s core conventions'. With respect freedom of association and collective bargaining, the COVC indicates: 'The facility shall recognize that workers are free to join associations of their own choosing. The facility shall not interfere with workers who wish to lawfully and peacefully associate, organize, or bargain collectively. The facility shall support that the decision whether or not to do so shall be made solely by the workers. The facility shall ensure that workers are free to choose whether or not to lawfully organize and join associations. If freedom of association and/or collective bargaining are restricted by law, workers shall be free to develop parallel means for independent and free association and collective bargaining.' [Human Rights Policy, June 2020 Update, 06/2020: gapinc.sustainability.com & Code of Vendor Conduct, 2016: gapinc.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: In the section Respecting Human Rights on the Company's website there are different links where it describe its policies and approaches to ensuring respect for human rights, treating the following themes: Child labour, forced labour, discrimination, freedom of associations (which include collective bargaining). With respect freedom of association and collective bargaining, the Company indicates: 'We understand that workers' opportunities to voice their concerns often depends on other factors, including good relations with management and the support of other workers or a trusted intermediary. We support the rights of workers and employees to freedom of association and collective bargaining through our Human Rights Policy and Code of Vendor Conduct.' [Respecting human rights 2020 update, N/A: gapinc.com/gapinc-sustainability] • Met: Respect H&S of workers: In its Code of Business Conduct the Company indicates: 'We are committed to providing a safe and healthy working environment for employees, customers, contractors and vendor' [Code of Business Conduct Updated January 2019, 01/2019: gapinc.com] • Met: H&S applies to AP suppliers: In its Code of Vendor Conducts the Company states that "The facility shall comply with all applicable laws and regulations regarding working conditions and shall provide workers with a safe and healthy environment." [Code of Vendor Conduct, 2016: gapinc.com] • Not met: working hours for workers: The Company indicates in its website 'Benefits, Scheduling + Safety' that its 'workplace culture and benefits are designed to meet the professional and personal needs of our employees and their families. For retail employees in particular, we improved wages and scheduling practices so that the people who work in our stores experience greater stability and flexibility.' However, CHRB could not find an specific commitment about ILO convention on labour standards on working hours for the Company's workers, or details requirements on maximum regular working hours, maximum regular working hours including overtime and resting periods. [Benefits, Scheduling and Safety, N/A: gapinc.com/gapinc-sustainability] • Not met: Working hours for AP suppliers: In its Code of Vendor Conducts the Company states that "The facility shall set working hours in compliance with all applicable laws. [...] The facility shall comply with all applicable laws, regulations, and industry standards on working hours. The maximum allowable working hours in any week shall be the lesser of a) what is permitted by national law or b) a total of 60 hours of work in any consecutive 7-day period. Although no direct evidence found in relation to normal week hours, it states that 'facility shall ensure that overtime hours not exceed legal limits or 12 hours in a week, whichever is lesser'. However, no requirement for a maximum of 48 regularly scheduled hours could be found. [Code of Vendor Conduct, 2016: gapinc.com] |
| A.1.4 | Commitment to engage with stakeholders | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: In its Human Rights Policy: 'We are committed to conducting ongoing human rights due diligence and to engage with our key stakeholders around the world to continue to improve our approach.' And in its Global Sustainability Report 2017 it indicates: 'We have many key stakeholders: the people who make our clothes, our customers, suppliers and factories, employees, unions, governments, multilateral institutions, NGOs, industry associations, investors, communities and others.' [Human Rights Policy, June 2020 Update, 06/2020: gapinc.com/gapinc-sustainability & 2017 Global Sustainability report, 11/2018: https://gapinc.com/unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc-sustainability] • Met: Regular stakeholder engagement: In its Global Sustainability Report 2017 there are some example for its latest collaborations with some of these stakeholders. For instance, the Workforce engagement program: 'We launched this program in collaboration with Verité in 2015 to measure and improve the degree to which garment workers feel valued and engaged at work. This program gives workers an opportunity to provide anonymous feedback on key topics, such as supervisor relationships, grievance mechanisms, and training and development opportunities.' [2017 Global Sustainability report, 11/2018: https://gapinc.com/unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc-sustainability] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: See above [Human Rights Policy, June 2020 Update, 06/2020: gapinc.com/gapinc-sustainability & 2017 Global Sustainability |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|----------------------|------------------|---|
| | | | report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx#1,10478,10565,0,, gapinc sustainability.com] |
| A.1.5 | Commitment to remedy | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: In its Human Rights Policy the Company states: 'Through proactive due diligence aligned with the UN Guiding Principles on Business and Human Rights we seek to avoid adverse human rights impacts and complicity in the adverse impacts caused by others. We are committed to providing access to effective remedy in the event that we cause or contribute to an adverse impact'. [Human Rights Policy, June 2020 Update, 06/2020: gapinc sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies: See above. However, no evidence found of statement com commitment to not obstructing access to other remedies. [Human Rights Policy, June 2020 Update, 06/2020: gapinc sustainability.com] • Not met: Collaborating with other remedy initiatives: See above. The Company discloses in its 2018 Sustainability Report that 'In partnership with our suppliers, NGOs, multilateral organizations and other stakeholders, we're establishing initiatives that are multifaceted and focus on a range of interventions: improving worker and management relations, innovating how we assess and improve working conditions, and using technology to directly engage with and respond to workers' needs.' However, no evidence found regarding collaboration with initiatives that provide access to remedy. [Human Rights Policy, June 2020 Update, 06/2020: gapinc sustainability.com & 2018 Global Sustainability Report, 08/2019: gapinc sustainability.com] • Met: Work with AP suppliers to remedy impacts: In its Human Rights Policy, the Company states: 'We recognize our responsibility to engage with our business partners to address and remedy adverse impacts and seek to build their capacity to respect human rights through training and engagement'. [Human Rights Policy, June 2020 Update, 06/2020: gapinc sustainability.com] |

Embedding Respect and Human Rights Due Diligence

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| B.1.1 | Responsibility and resources for day-to-day human rights functions | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact. • Met: Senior responsibility for HR: In its Human Rights Policy the Company states: 'executive oversight and responsibility for the implementation of this policy rests with our Chief Legal, Compliance and Sustainability Officer'. [Human Rights Policy, June 2020 Update, 06/2020: gapinc sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: in the Company submission to KnowTheChain 2016 the Company describes how resources and responsibilities are allocated: 'The Global Sustainability team is responsible for the implementation of policies and standards. Assessment & remediation specialist assess and validate that suppliers are meeting the code of vendor conduct. The team is led by the Senior Director of the Supplier Sustainability Team, who reports to the VP of Global Sustainability.' This disclosure is from 2016 and no equivalent information has been found for the last three reporting years. To alleviate the reporting burden for companies during the Covid-19 crisis, the CHRB will (on an exceptional basis) relax the three-year timeframe and include information from 2016 in the 2020 assessment. [Submission to KnowtheChain 2016, 2016: business-humanrights.org] • Met: Day-to-day responsibility for AP in supply chain: See above [Submission to KnowtheChain 2016, 2016: business-humanrights.org] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| B.2.1 | Identifying: Processes and triggers for identifying human rights risks and impacts | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: On its Global Sustainability Report 2017 the Company states: 'Our Global Sustainability team works with business partners and experts to assess the importance of potential social and environmental risks and opportunities for our business and external stakeholders, including suppliers and the people who make our products. [...] For these materiality and other risk assessments, we consider such factors as the magnitude, likelihood and time horizon of potential impacts on our business and stakeholders'. [2017 Global Sustainability report, 11/2018: https://gapincustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability.com] • Met: Identifying risks in AP suppliers: See above [2017 Global Sustainability report, 11/2018: https://gapincustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above [2017 Global Sustainability report, 11/2018: https://gapincustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability.com] • Met: In consultation with stakeholders: As indicated above, the Company 'works with business partners' to assess the importance of potential impacts. [2017 Global Sustainability report, 11/2018: https://gapincustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability.com] • Not met: In consultation with HR experts: The Company indicates that it works with experts to assess risks and impacts. In its Statement on XUAR, it discloses that it is 'taking steps to better understand how our global supply chain may be indirectly impacted, including working with our suppliers and actively engaging with industry trade groups, expert stakeholders, and other partners to learn more and advance our shared commitment to respecting human rights.' Additionally, the Company lists the organisations with which it partners. However, no evidence of consultation with human rights experts to identify risks could be found. [2017 Global Sustainability report, 11/2018: https://gapincustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability.com & Statement on XUAR, N/A: gapincustainability.com] • Not met: Triggered by new circumstances: The Company indicates on its Submission 2016 to Know the Chain that it has a country risk assessment process to evaluate the overall risk level and specific risks in its key sourcing countries: 'Through this country risk assessment, we are able to identify the most salient human rights risks in our key sourcing countries and to develop country-specific strategies to address them. However, not clear what triggers the system. [Submission to KnowtheChain 2016, 2016: business-humanrights.org] |
| B.2.2 | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): On its website section 'Managing Risks', the Company indicates that its Internal Audit team 'prioritizes risks based on the likelihood and severity of their potential impact on meeting the company's strategic initiatives and maintaining business operations. We then monitor these areas for trends. Our executive leadership team and the Board review and sign off on enterprise risk assessments. In addition, our Global Sustainability team works with business partners and experts to assess the importance of potential social and environmental risks and opportunities to our business and external stakeholders, including suppliers and the people who make our products. [...]. The team uses tools to help prioritize risks and opportunities, including a sustainability materiality assessment, assessment of representative products and a stakeholder engagement process. For these materiality and other risk assessments, we consider such factors as the magnitude, likelihood and time horizon of potential impacts on our business and stakeholders.' [Managing risks, N/A: gapincustainability.com] • Met: Public disclosure of salient risks: The Company discloses its key human rights on its website section 'Respecting Human Rights' which are: Child labour and young workers; discrimination and harassment; wages & benefits; Fire & building safety; Grievance mechanisms; Human trafficking and Forced labour; working hours; human treatment; freedom of association; Foreign Contract Workers and Recruitment; Short-Term Contracts and Unauthorized Subcontracting. [Respecting human rights 2020 update, N/A: gapincustainability.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | Score 2 • Met: Both requirements under score 1 met |
| B.2.3 | Integrating and Acting: Integrating assessment findings internally and taking appropriate action | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: In its Human Rights Policy, the Company states: 'Gap Inc's COBC hotline is made available for employees to raise concerns about potential violations of our Code of Business Conduct. Any concerns are addressed using a robust internal process, and we regularly update our policies and practices based on our findings. At the factory level, we support worker committees where grievances can be expressed, and we check that they are present through our Supplier Sustainability assessment program'. In addition, the Company includes on its website section 'Respecting Human Rights' different links to each of its human rights issues, where there is information about some actions it is implementing. However, further information describing a global system or an Action Plan which summarizes its actions to prevent, mitigate or remediate each salient risks is needed to meet this subindicator. [Human Rights Policy, June 2020 Update, 06/2020: gapinc.com/gapinc-sustainability & Respecting human rights 2020 update, N/A: gapinc.com/gapinc-sustainability] • Not met: Including in AP supply chain: The Company provides a description of a system to improve the supplier compliance, by eliminating red-rated suppliers (those who need improvement on one or more serious compliance issue) from its supply chain. The Company discloses the following: 'In 2017, Gap Inc. set a goal to not work with any red-rated facilities by 2020. We have made significant strides toward this goal, moving from 16 percent red-rated facilities in 2016 to less than 2 percent by the end of fiscal 2018. By integrating this work more deeply into our sourcing decisions and concentrating our business with preferred vendors, we were able to increase our investment to help facilities close out COVC violations in a sustainable, responsible way. In addition to a dedicated Supplier Sustainability team that engages directly with facilities on these issues and targets, we train global sourcing employees on human rights policies and procedures, building company-wide awareness on COVC requirements, and collaborating internally to manage vendor performance and drive sustained performance. Through training and education, we also work closely with key vendors to build their capacity for continuous improvement and help them implement proactive measures that will prevent COVC issues from arising in the first place. [...] We also changed our approach to assessing red-rated facilities. Rather than waiting one year after our full assessment to reassess red-rated facilities, we work with them to develop a time-bound corrective action plan and evaluate them again at the end of the agreed-upon time frame to determine whether they have successfully achieved the required remediation. This approach allows us to work more closely with facility management to ensure that they are making the necessary investments and adjustments to their practices'. However, evidence seems to refer to compliance monitoring and corrective actions where these, or other gaps, are found. This indicator looks for evidence of broad actions carried out to mitigate the risks that the Company faces through the supply chain. Even if monitoring can be considered and action, indicator looks for proactive measures carried out broadly to prevent/mitigate potential violations. [2018 Global Sustainability Report, 08/2019: gapinc.com/gapinc-sustainability & Improving Supply Chain working conditions, N/A: gapinc.com/gapinc-sustainability] • Met: Example of Actions decided: On its website the Company describes how it has been working to face one of the most salient human rights issues: Human Trafficking and Forced Labour: 'Risk mapping has identified, in addition to Unauthorized Subcontracting and foreign contract workers, the particular risks that refugee workers may face. For example, 'we know that certain countries from which we source are absorbing Syrian refugees into their formal economies. We are committed to partnering with a broad set of stakeholders to ensure that our vendors have the appropriate capabilities and infrastructure in place to ensure that opportunities for employment and fair, decent working conditions are made available to them. In Jordan, we are partnering with The World Bank on a project emphasizing job readiness training and employment placement for Syrian refugees'. The Company provides examples of action taken in other locations such as Turkey and India. [CA Transparency in Supply Chains Act / UK Modern Slavery Act: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| B.2.4 | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company discloses how it tracks and monitors compliance with its standards and human rights. However, no evidence found in relation to a system to track the actions taken in response to salient issues identified across the Company, and evaluating whether its actions have been effective to handle key issues generally. No additional evidence found in the latest report. Additionally, the Company participated in a study of its supply chain, entitled 'Can Sourcing Help Enforce Global Labor Standards?' However, no system to check if action are effective could be found. [Global Sustainability Report 2015-2016, 2017: gapinc.sustainability.com & 2018 Global Sustainability Report, 08/2019: gapinc.sustainability.com] • Not met: Lessons learnt from checking effectiveness: The Company provides details of compliance within its supply chain, broken down by country, year, and issue found. However, no evidence of lessons learnt from checking effectiveness of actions taken to mitigate specific salient issues could be found. [COVC Finding and Resolutions 2015-2017: gapinc.sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met |
| B.2.5 | Communicating : Accounting for how human rights impacts are addressed | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. • Met: Comms plan re assessing risks: See indicator B.2.2 [Managing risks, N/A: gapinc.sustainability.com & Respecting human rights 2020 update, N/A: gapinc.sustainability.com] • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including AP suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 <p>Score 2</p> <ul style="list-style-type: none"> • Met: Responding to affected stakeholders concerns: The Company has worked with the Workers Rights Consortium to make improvements in its supply chain. In the most recent case, from 2019, 'The WRC's investigation found that PT Kahoindah Bekasi violated Indonesian law, and by extension university labor standards, by failing to pay workers a substantial portion of their legally mandated terminal compensation. Specifically, in the months leading up to its cessation of operations, PT Kahoindah Bekasi unlawfully used coercion and false representations to convince workers to resign from the factory. As a result, workers received only half of the severance to which they would have been legally entitled had they remained in the factory's employ and been terminated upon its closure. The average financial loss to each worker, as a result of being compelled or misled to resign, was seven months' wages.' The Company, among others, 'led the way in engaging with [Korean-based parent company] Hojeon to ensure that they understood their obligation to adequately compensate workers. These brand communications ultimately led Hojeon's management to reach out to the WRC to discuss remediation of outstanding violations concerning severance. After sharing relevant employment and financial information with the WRC, Hojeon agreed to pay 2,001 former employees an additional US\$4.5 million to account for unpaid severance.' [Workers Rights Consortium: PT Kahoindah Citragarment Tambun-Bekasi, N/A: workersrights.org] • Not met: Ensuring affected stakeholders can access communications |

Remedies and Grievance Mechanisms

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| C.1 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: On its Code of Business Conduct the Company indicates that there is a COBC Hotline which is 'free, confidential and available online and by telephone, 24 hours a day, seven days a week, around the world (interpreters are available).' [Code of Business Conduct Updated January 2019, 01/2019: gapinc.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: See above [Code of Business Conduct Updated January 2019, 01/2019: gapinc.com] • Met: Expect AP supplier to have equivalent grievance systems: On its Code of Vendor Conduct the Company indicates: 'The facility shall ensure that workers have means to report grievances to management, including a channel that provides for confidentiality and anonymity. The facility shall also ensure workers can bring to management's attention grievances through means other than their immediate supervisor. The grievance system shall include addressing grievances in a timely manner and documenting grievances and management action on grievances.' [Code of Vendor Conduct, 2016: gapinc.com] • Not met: Opens own system to AP supplier workers |
| C.2 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states in its Code of Business Conduct that there is a COBC Hotline which is 'free, confidential and available online and by telephone, 24 hours a day, seven days a week, around the world (interpreters are available)' and in its website section 'Acting with Integrity' that the COBC Hotline is available not only to employees but also 'anyone who conducts business with Gap Inc. or is affected by our business'. [Code of Business Conduct Updated January 2019, 01/2019: gapinc.com & Acting with integrity: gapincustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: As stated above, the hotline is available online and interpreters are available. [Code of Business Conduct Updated January 2019, 01/2019: gapinc.com] • Not met: Expects AP supplier to have community grievance systems: On its Code of Vendor Conduct the Company states that suppliers' facilities 'shall ensure that workers have means to report grievances to management, including a channel that provides for confidentiality and anonymity'. However it is not clear whether these channel are available for external individuals or communities. [Code of Vendor Conduct, 2016: gapinc.com] • Not met: AP supplier communities use global system |
| C.7 | Remedying adverse impacts and incorporating lessons learned | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: On its website page 'Child Labor and Young Workers', the Company indicates: 'In the rare event that we encounter child labor at an approved facility, we take immediate action to resolve the issue, including: removing young workers from the facility; making sure workers have access to education or appropriate training, receive an ongoing wage and are guaranteed a job if they choose to work at the facility when they are older; requiring the offending supplier to pay for all remediation costs'. It also describes the case of 'Samie's Finishing House': 'While Gap Inc. had no direct involvement with Samie's Finishing House, we wanted to help the 10 children who were found working there. Eight of them, ranging in age from 12 to 15 years old, agreed to accept our offer to help them go to school. We commissioned Impactt, an organization specializing in ethical trade and human rights, to implement the remediation program.' <p>Impactt met with the children and their families in the Dhokin Khan slum area of Dhaka, helped the children enrol in school, and conducted follow-up visits. The children and their parents reported that their lives have improved significantly since the children started school [...]' [Child Labor and Young Workers: gapincustainability.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: The Company provides the response to Business & Human Rights Resource Center regarding the allegations of gender based violence in its Asian supply chains. The Company indicates: 'To help us advance that commitment, we've sought to reconfigure our supply base to focus on partners that share our sustainability values and goals. Over the past two years, we have also significantly increased the number of factories we source from that are assessed by ILO's Better Work program.' In addition, the Company indicates: 'we have initiated a dialogue with some of our key implementing partners, among them CARE, ILO Better Work, and Verité, to discuss how our industry can accelerate its effort to address this global, systemic issue.' [Gap response to allegations of gender based violence in Asian supply chain, 06/2018: business-humanrights.org] • Not met: Evaluation of the channel/mechanism |

Performance: Responses to Serious Allegations (Not included in the overall score)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| E(1).0 | Serious allegation No 1 | | <ul style="list-style-type: none"> • Headline: Supply chains of Kraft Heinz and Gap criticized for forced labor and discrimination linked to China's political assimilation ethnic Uighurs and Muslims • Area: Forced labour • Story: 16 May 2019, An investigation by the Wall Street Journal (WSJ) has identified forced labour in supply chains linked to major western brands, including apparel and food manufacturers. The article cites interviews with a number of workers of Uyghur ethnicity, who have been 'recruited' from their villages and forced to work in factories as part of the Chinese government's 're-education' program focused in the Xinjiang region, which many NGO and human rights groups have criticised as amounting to situations of discrimination and coercion. <p>In early 2017, the Communist Party began a new incarceration campaign, rounding up, detaining and forcibly indoctrinating Uyghurs and other Muslim minority ethnic groups in the far-western region. Islam has effectively been outlawed in the far-western region, with people routinely labelled as extremists and imprisoned for practising their religion. A UN committee describes the province as resembling a "mass internment camp", with estimates more than 1 million Uyghurs have been sent to prison or re-education camps. The article observes a number of factories in Xinjiang make yarn, which is then sent to other factories in China and countries including Bangladesh and Cambodia to produce clothing products. Additionally, Uyghur workers are also recruited to work in food processing factories, which supply products to major western food brands. In response to enquiries from the WSJ, a Gap spokeswoman said two of its suppliers use yarn from mills in Xinjiang, and the brand is currently sorting supplier mills as "preferred" and "non-preferred." The company has "communicated to our vendors' entire mill base our expectations of their social and environmental performance, which are conditions of doing business with us," she said.</p> <ul style="list-style-type: none"> • Sources: [Wall Street Journal - 16/05/2019: wsj.com] |
| E(1).1 | The Company has responded publicly to the allegation | 1 | <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: In the company's response to the Wall Street Journal, a Gap spokeswoman said two of its suppliers use yarn from mills in Xinjiang, and the brand is currently sorting supplier mills as "preferred" and "non-preferred." The company has "communicated to our vendors' entire mill base our expectations of their social and environmental performance, which are conditions of doing business with us," she said. In further correspondence to the Business & Human Rights Resource Centre in May 2020 the company elaborated further on the subject. [Response to BHRRC, 23/03/2020: business-humanrights.org & Response to Wall Street Journal allegations, 16/05/2019: ttps://wsj.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: In further correspondence to the Business & Human Rights Resource Centre in May 2020 the company said "We can confirm that we do not source any garments from the XUAR [Xinjiang] region. We also recognize that a significant amount of the world's cotton supply is grown and spun there. Therefore, we are taking steps to better understand how our global supply chain may be indirectly impacted, including working with our suppliers and actively engaging with industry trade groups, expert stakeholders, and other partners to learn more and advance our shared commitment to respecting human rights. At Gap Inc., we have strict policies against the use of involuntary labor of any kind in our supply chain. Any instance of forced detention and labor or suppression of an individual's human rights is unacceptable to us. Such conduct not only violates our Code of Vendor Conduct and Human Rights Policy, but also stands against our fundamental beliefs as a company." However this response doesn't provide sufficient detail. [Response to BHRRC, 23/03/2020: business-humanrights.org & Response to Wall Street Journal allegations, 16/05/2019: ttps://wsj.com] |
| E(1).2 | The Company has appropriate policies in place | 2 | <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company's Vendor Code of Conduct states "The facility shall not use involuntary labor of any kind, including prison labor, debt bondage, slave labor, or forced labor by governments..." [Code of Vendor Conduct, 2016: gapinc.com] • Met: Policies apply to the type of business relationships involved: The company's Vendor Code of Conduct states "This Code of Vendor Conduct (COVC) applies to all facilities that produce goods for Gap Inc. or any of its subsidiaries, divisions, affiliates or agents. Gap Inc. recognizes that there are different legal and cultural |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <p>environments in which facilities operate throughout the world. This Code sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc.". [Code of Vendor Conduct, 2016: gapinc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company's Vendor Code of Conduct states "The facility shall not use involuntary labor of any kind, including prison labor, debt bondage, slave labor, or forced labor by governments...The facility shall ensure that if entrances are guarded for security reasons...workers shall have free egress at all times...The facility shall not employ tactics to prevent workers from leaving at will, such as withholding salary as a "year-end bonus" or charging a penalty...when workers terminate their contract, or by withholding any personal...identification documents such as IDs and passports...The facility shall ensure that beyond reasonable restrictions, workers can move freely within the facility to use the toilets, drink water, and take designated breaks...The facility shall ensure that workers are allowed to leave freely at the end of the shift or during the shift under extenuating circumstances like illness or family emergencies [Code of Vendor Conduct, 2016: gapinc.com] |
| E(1).3 | The Company has taken appropriate action | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but has engaged affected stakeholders: A spokeswoman said the company was currently sorting supplier mills as "preferred" and "non-preferred." Additionally noting that the company has "communicated to our vendors' entire mill base our expectations of their social and environmental performance, which are conditions of doing business with us,". In a subsequent communication the company said "We can confirm that we do not source any garments from the XUAR region. We also recognize that a significant amount of the world's cotton supply is grown and spun there. Therefore, we are taking steps to better understand how our global supply chain may be indirectly impacted, including working with our suppliers and actively engaging with industry trade groups, expert stakeholders, and other partners to learn more and advance our shared commitment to respecting human rights." However this is not sufficient detail on how it is engaging with affected stakeholders. [Response to BHRRC, 23/03/2020: business-humanrights.org & Response to Wall Street Journal allegations, 16/05/2019: https://wsj.com] • Met: Denies allegations, but reviewed systems to prevent such impacts: A spokeswoman said the company was currently sorting supplier mills as "preferred" and "non-preferred." Additionally noting that the company has "communicated to our vendors' entire mill base our expectations of their social and environmental performance, which are conditions of doing business with us,". [Response to BHRRC, 23/03/2020: business-humanrights.org & Response to Wall Street Journal allegations, 16/05/2019: https://wsj.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: A spokeswoman said the company was currently sorting supplier mills as "preferred" and "non-preferred." Additionally noting that the company has "communicated to our vendors' entire mill base our expectations of their social and environmental performance, which are conditions of doing business with us,". In a subsequent communication the company said "We can confirm that we do not source any garments from the XUAR region. We also recognize that a significant amount of the world's cotton supply is grown and spun there. Therefore, we are taking steps to better understand how our global supply chain may be indirectly impacted, including working with our suppliers and actively engaging with industry trade groups, expert stakeholders, and other partners to learn more and advance our shared commitment to respecting human rights." However this is insufficient evidence on the changes that the company has implemented as a result of a review into its management systems. [Response to BHRRC, 23/03/2020: business-humanrights.org & Response to Wall Street Journal allegations, 16/05/2019: https://wsj.com] • Not met: Denies allegations, and ensures systems prevent such impacts: A spokeswoman said the company was currently sorting supplier mills as "preferred" and "non-preferred." Additionally noting that the company has "communicated to our vendors' entire mill base our expectations of their social and environmental performance, which are conditions of doing business with us,". In a subsequent communication the company said "We can confirm that we do not source any garments from the XUAR region. We also recognize that a significant amount of the world's cotton supply is grown and spun there. Therefore, we are taking steps to better understand how our global supply chain may be indirectly impacted, including working with our suppliers and actively engaging with industry trade |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | groups, expert stakeholders, and other partners to learn more and advance our shared commitment to respecting human rights." However this is insufficient detail on how the company has ensured its systems will prevent such impacts from occurring in the future. [Response to BHRRC, 23/03/2020: business-humanrights.org & Response to Wall Street Journal allegations, 16/05/2019: https://wsj.com] |
| E(2).0 | Serious allegation No 2 | | <ul style="list-style-type: none"> • Headline: SOMO report accuses large clothing brands such as H&M, Gap, VF of having their clothes made in Bangladesh by suppliers where working hours exceed 60 hours a week • Area: Working hours • Story: A 2017 report by the Centre for Research on Multinational Corporations (SOMO) has accused clothing brands such as Gap, H&M and VF of having their clothes made in Bangladesh by suppliers where working hours exceed 60 hours a week. Working weeks exceeding 60 hours were reported at eight factories of companies supplying brands including: C&A, H&M, VF Corporation, Gap and Kmart. Some workers were reportedly being forced to do additional overtime, having to regularly work until midnight and being paid for additional hours separately in cash. Even when overtime payments were included in the wages, not one of the interviewed workers earned a living wage. The average total take-home salary was only a third of what would constitute a living wage. • Sources: [SOMO Report 'Branded childhood', January 2017 -: somo.nl] |
| E(2).1 | The Company has responded publicly to the allegation | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: As far as CHRB was able to ascertain, the Company has not responded publicly to the allegation. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail |
| E(2).2 | The Company has appropriate policies in place | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: In its Human Rights Policy the Company states: 'We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights [...] and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.' In addition to this, the Company website indicates: 'We are proud to support the principles outlined in the Universal Declaration of Human Rights (UDHR), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO's core conventions.' [Human Rights Policy, June 2020 Update, 06/2020: gapinc.com & Respecting human rights 2020 update, N/A: gapinc.com] • Met: Policies apply to the type of business relationships involved: The Company states that its Code of Vendor Conduct 'sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc.'. [Code of Vendor Conduct, 2016: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company states that its Code of Vendor Conduct 'sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc.'. All four core ILOs requirements are covered under the code, as well as health and safety, wages and work hours. 'The facility shall comply with all applicable laws, regulations, and industry standards on working hours. The maximum allowable working hours in any week shall be the lesser of a) what is permitted by national law or b) a total of 60 hours of work in any consecutive 7-day period...The facility shall allow workers at least one day off in seven days, or the local legal standard if more stringent. A day off must be at least 24 hours of continuous rest.' <p>The Company states that the policies contained in the Code of Vendor Conduct 'sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc.' [Code of Vendor Conduct, 2016: gapinc.com]</p> |
| E(2).3 | The Company has taken appropriate action | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders |
| E(3).0 | Serious allegation No 3 | | <ul style="list-style-type: none"> • Headline: Report finds female migrant workers are subjected to conditions of modern slavery in factories supplying to many brands |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <ul style="list-style-type: none"> • Area: Forced Labour - restriction of movement • Story: On February 28, 2018, the Business & Human Rights Resource Centre website reported on a study conducted by the India Committee of the Netherlands, Clean Clothes Campaign and Garment Labour Union. The report 'Labour without Liberty' looked into the living conditions in Bangalore garment factory hostels and the particular challenges migrant workers face. It found that five out of the eleven ILO (International Labour Organization) indicators for forced labour exists in the Bangalore garment industry: abuse of vulnerability, deception as a result of false promises (wages etc.), restriction of movement in the hostel, intimidation and threats, and abusive working and living conditions. The report identifies two companies, Company 1 & Company 3 as supplying a number of major fashion brands, including Gap. Connected to these Companies are 'hostels', living quarters for workers located nearby the factory they work at. Women who lived at these hostels complained that their movement was restricted by the factory employees and hostel authorities. At Company 1 the women were escorted from the factory back to the hostel in the afternoon and were banned from leaving the hostel during weekday evenings. On Sunday's they were allowed to leave the hostel unaccompanied, however this was only between the hours of 4pm to 7pm. At Company 3, women were only allowed to leave the hostel for a total of 3 hours on Sunday, between 12pm and 7pm, on all other days they had to be back inside the hostel by 7pm. Additionally, hostel authorities would not allow the families of the women to enter the hostel when they came to visit, and the use of mobile phones was only permitted between 8.30pm - 9.30pm at night. While some of these aspects are also felt by the local workforce, they were more strongly experienced by migrant workers. According to the report, the factories studied produce for C&A, Columbia, Decathlon, Gap, H&M, PVH, Marks & Spencer, Abercrombie & Fitch, Benetton and Levi Strauss. • Sources: [Business & Human Rights Resource Centre - 28/02/2018: business-humanrights.org][Clean Clothes Campaign - 26/01/2018: cleanclothes.org] |
| E(3).1 | The Company has responded publicly to the allegation | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The company has publicly responded to the allegations on the BHRRC website. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company responds in detail to the allegations raised in the report, including an explanation of engagement that has been undertaken since the data within the report was gathered. It acknowledges more action is required to protect the rights of migrant workers and sets out in detail the approach Gap has adopted to respond to the issue. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] |
| E(3).2 | The Company has appropriate policies in place | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company has a Human Rights policy committing it to respecting the human rights principles covered in this allegation such as working conditions and female empowerment, and also extends these requirements through its supply chain through the Business Code of Conduct and Code of Vendor Conduct [Code of Business Conduct: gapinc.com & Human Rights Policy: gapinc.com/sustainability] • Met: Policies apply to the type of business relationships involved: The company says its Code of Vendor Conduct " applies to all facilities that produce goods for Gap Inc. or any of its subsidiaries, divisions, affiliates or agents. Gap Inc. recognizes that there are different legal and cultural environments in which facilities operate throughout the world. This Code sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc." This policy applies to the factory who the allegation relates to [Human Rights Policy: gapinc.com/sustainability & Code of Vendor Conduct, 2016: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company's 'Code of Vendor Conduct' states that "The facility shall ensure that if entrances are guarded for security reasons, workers shall have free egress at all times." and also that "The facility shall ensure that beyond reasonable restrictions, workers can move freely within the facility to use the toilets, drink water, and take designated breaks. " These policies address the specific rights in question [Code of Business Conduct: gapinc.com & Code of Vendor Conduct, 2016: gapinc.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| E(3).3 | The Company has taken appropriate action | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: The company says it has engaged in a dialogue with stakeholders; "Our teams have engaged extensively with our suppliers in South India, and have conducted offsite and onsite interviews with workers to inform our recommendations on how our suppliers should address the issues highlighted in the report." However, They have not engaged with the women who were affected or similar type (women in the same working and living conditions in the same region) [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] • Met: Encourages linked business to engage affected stakeholders: The company says "We have required our suppliers to form a Hostel Committee to address the issues identified through our own assessments and in ICN's report, including freedom of movement within hostels. We have further encouraged our suppliers to engage with independent and credible NGOs that can help manage these hostels." [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] • Not met: Provides remedies to affected stakeholders: No evidence provided that the company has provided remedy to those women whose freedom of movement was restricted by the hostels they were staying at. Relevant grievance mechanisms have not yet been established. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] • Met: Has reviewed management systems to prevent recurrence: The company states that "We are implementing our Workplace Cooperation Program in Southern India. This program is focused on helping establish functioning grievance mechanisms and harmonious industrial relations through social dialogue". This can be considered evidence it has reviewed management systems. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: No evidence that of remedy being provided to the victims, nor that the victims have accepted any such remedy. • Met: Has improved systems and engaged affected stakeholders: The company says it is implementing a multipronged approach to address the issues reported at the hostels and supplier operations. These include engagement with hostels to improve their practices and address issues highlighted by the report. They are also implementing a Workplace Cooperation Program in south India to establish functioning grievance mechanisms and also a P.A.C.E program, to provide female garment workers with professional and life skills training. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] |
| E(4).0 | Serious allegation No 4 | | <ul style="list-style-type: none"> • Headline: Gap criticized for failing to address supply chain issues in Bangladesh, Cambodia, and elsewhere • Area: Discrimination • Story: In May 2018, a global coalition of trade unions, worker rights and human rights organizations published reports on Gender Based Violence among supply chains in Bangladesh, Cambodia, India, Indonesia, and Sri Lanka. It is based on interviews with more than 215 workers employed in 21 factories that supply to Gap, H&M and Walmart. The reports revealed a range of human rights violations, focusing on women who work in supply chains. <p>In Bangladesh, women employed in Gap, H&M and Walmart supplier factories reported that it is common for supervisors and managers to pursue sexual relationships with women workers by offering benefits including salary increases, promotions, and better positions. In addition, there is the risk of sexual harassment from male mechanics tasked with fixing their machines. In Indonesia, women employed by a Gap supplier factory report male mechanics demanding sexual favours in return for fixing their machines which they need to meet their work targets. Women working for a Gap supplier factory In Sri Lanka report that they are particularly vulnerable to sexual harassment by their supervisors when they stand in line to clock-in and clock-out using biometric fingerprinting machines. Furthermore, the report states that there werer 4 cases of sexual violence, including rape, in Gap supplier factories in Cambodia. In addition, Workers from four Gap supplier factories in Gurugram (Gurgaon), India reported that women are routinely fired from their jobs during their pregnancy. Permanent workers report being forced to take leaves without pay for the period of their pregnancy.</p> <ul style="list-style-type: none"> • Sources: [Gap website, 13/06/18: globallaborjustice.org] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | |][Global Labour Justice, 13/06/18: globallaborjustice.org][Global Labour Justice, 23/05/16: globallaborjustice.org] |
| E(4).1 | The Company has responded publicly to the allegation | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: The Company states "We are deeply concerned by the allegations raised in this report, and our Global Sustainability team is currently conducting additional due diligence to investigate and address the allegations raised within it." [Gap response to allegations of gender based violence in Asian supply chain, 06/2018: business-humanrights.org] Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail [Gap response to allegations of gender based violence in Asian supply chain, 06/2018: business-humanrights.org & Report on gender based violence in Asian supply chains, May 2018: business-humanrights.org] |
| E(4).2 | The Company has appropriate policies in place | 2 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: In its Human Rights Policy the Company states: 'We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights [...] and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.' In addition to this, the Company website indicates: 'We are proud to support the principles outlined in the Universal Declaration of Human Rights (UDHR), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO's core conventions.' [Human Rights Policy: gapinc.com & Respecting Human Rights: gapinc.com] • Met: Policies apply to the type of business relationships involved: The policy also applies to the Company's business partners. [Human Rights Policy: gapinc.com] Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: In its code of business conduct, the company prohibits discrimination against pregnant women. It also prohibits engagement in or permission of 'psychological coercion or any other form of non-physical abuse, including threats of violence, sexual harassment, screaming, or other verbal abuse'. [Code of Business Conduct: gapinc.com & Report on gender based violence in Asian supply chains, May 2018: business-humanrights.org] |
| E(4).3 | The Company has taken appropriate action | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: CHRB did not find evidence of the Company's engagement with affected stakeholders. [Gap response to allegations of gender based violence in Asian supply chain, 06/2018: business-humanrights.org] • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies. • Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case. Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company engaging with stakeholders followed by the case. |

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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