

Company name: Gap Inc.

Total weighted score: 53.9* out of 100

Weighted score by measurement area

Weighted Score	Out of	Measurement area
14.5	20.0	Governance and strategy
7.7	17.5	Representation
2.4	17.5	Compensation and benefits
10.9	17.5	Health and well-being
10.9	17.5	Violence and harassment
2.5	5.0	Marketplace
5.0	5.0	Community

(*) The scores in this detailed assessment are unweighted (out of 2) and, therefore, change when weights are applied per the [Gender Benchmark Methodology 2020](#). Differences between the total weighted score and the sum of the weighted scores across measurement areas may occur due to rounding, but this has not had any overall effect on the ranking.

Governance and strategy (20% of total score)

CORPORATE

Indicator	Score (out of 2)	Assessment
1. Strategic action	2	MET: The company has made a public commitment to gender equality and women's empowerment as a signatory to the UN Women's Empowerment Principles.
		MET: The company has integrated gender equality and women's empowerment in the community and supply chains into its Sustainability Strategy, through a focus on expanding its P.A.C.E program. It also appears to have a standalone strategy for advancing women in the workplace through learning and development, inclusion and leadership training.
		MET: The company has conducted a self-assessment using the WEPs Gender Gap Analysis Tools
		MET: The company has clear, timebound targets to advance gender equality and support women and girls in the supply chain and communities such as 100% of Tier 1 suppliers transition to digital wage payments by 2020 and reaching 1 million women through P.A.C.E. by 2022.
2. Senior leadership accountability	1.5	PARTIALLY MET: The company's Director for Global Equality and Belonging appears to be responsible for gender equality in the workplace, while the company's Senior Manager, P.A.C.E. Operations and Partnerships and leader of Gap Inc.'s Women in Leadership networking group appears to lead the work in the community and supply chain. However the company does not have one individual who is responsible for gender.
		MET: The company has clear targets for its P.A.C.E program and measures and reports its progress against these annually, it is clear that this program falls within the companies Global Sustainability program, which is overseen by the board of directors, who receive "regular updates from Chief Legal, Compliance and Sustainability Officer, Julie Gruber, and the leaders of the Global Sustainability team."

3. Gender-responsive human rights due diligence process	1	MET: The company has identified Women's Empowerment as one of 3 core areas of its human rights impacts that it screens for as part of its risk assessment for salient human rights risks.
		NOT MET: The company has identified Women's Empowerment as one of 3 core areas of human rights impact, along with its supply chain and its employees. However, it is unclear which specific impacts to women have been identified as salient risks for the company.
		NOT MET: There is no evidence that the company has consulted any gender-specific stakeholder groups as part of its human rights due diligence risk identification and assessment process.

WORKPLACE

Indicator	Score (out of 2)	Draft assessment
4. Sex-disaggregated data	0.5	NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated grievance data (e.g. number of grievances reported, number of grievances remediated), at least annually.
		MET: The company has tracked global gender representation across various levels from 2013 to 2019
		NOT MET: There is no evidence that the company collects, analyse and monitor sex-disaggregated data on the percentage of employees participating in its professional development, at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on turnover and absenteeism, at least annually.
		NOT MET: There is no evidence that the company collects analyses and monitors sex-disaggregated data on its global gender pay gap, at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on the remediation of violence and harassment grievances at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on the total procurement spend that is directed to women-owned businesses.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on injuries, fatalities and absenteeism of workers in the supply chain.
5. Grievance mechanism	2	<p>MET: The company's grievance mechanism includes at least 6 gender-responsive elements:</p> <ul style="list-style-type: none"> - Confidential - Anonymous - Alternate access to a party concerning the grievance, if the perpetrator is the direct supervisor of the aggrieved party - Allows verbal submission of grievances via a telephone line - Ensures protection of the aggrieved party (non-retaliation) - Is available in multiple language or has interpreters available
6. Employee engagement	1	MET: The company's PARENTS@Gap Inc. Equality & Belonging Group has worked to normalized the conversations around flexible schedules among teams and managers.
		NOT MET: There is no evidence to suggest that the company has incorporated feedback related to gender issues into its policies and/or practices.

7. External stakeholder engagement	2	MET: The company collaborated with a number of external stakeholders to create Empower@Work: a shared platform to leverage knowledge, skills, and networks to drive collective action to benefit women workers and gender equity in global supply chains.
		MET: The company appears to have integrated external stakeholder feedback into its work on gender through the Empower@Work project and its five-year Women + Water Global Development Alliance with the United States Agency for International Development.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
8. Commitment in the supply chain	2	MET: The company carries out worker engagement (surveys, focus groups and one-on-one interviews) and has recently adapted its Worker Engagement Program to a mobile-engagement tool for use by factory management. In 2019, the company adopted Nike's survey tool as part of this program, which does include gender-specific questions.
		MET: The company has clear, timebound targets aimed at advancing gender equality and women's empowerment in its supply chain.
		MET: The company tracks its progress towards its clear, timebound targets on advancing gender equality and women's empowerment in the supply chain.
9. Grievance mechanism in the supply chain	0.5	NOT MET: There is no evidence that the company ensures its supply chain workers have access to its own grievance mechanism to raise complaints (including in relation to gender-related issues) about the company's suppliers or the company's operations
		PARTIALLY MET: The company requires suppliers to have a workplace grievances mechanism, however there is no requirement for this to be communicated to workers, for suppliers to collect and analyse sex- disaggregated grievance data or for the mechanism to be available to external parties and communities.
10. Corrective action process in the supply chain	2	MET: The company's audit process screens for gender-related issues among its suppliers, such as: <ul style="list-style-type: none"> - Sexual harassment - Discrimination based on gender - Discrimination against pregnant women - Discrimination against married women - Health and safety of pregnant and breastfeeding women - Non-retaliation against trade union members - No policy to prevent harassment or abuse
		MET: The company requires factories to remediate all violations of its Code of Vendor Conduct (COVC) - which includes gender-related issues such as sexual harassment, discrimination against pregnant women, health and safety of pregnant and breastfeeding women - to be completed within a specific timeline that is agreed with the factory.
		NOT MET: The company will terminate suppliers where they fail to remediate (over time) persistent or egregious issues, however there is no evidence on which issues would be considered egregious.

Representation (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
11. Gender equality in leadership	1	MET: 40-60% of the members of the board are women (46%)
		NOT MET: More than 60% of the senior executives are women (67%)

		MET: Between 40-60% of senior management are women (58%)
		NOT MET: More than 60% of middle management are women (72%)
12. Professional development and promotion	0	NOT MET: The company has 2 programs specifically targeted at women in the company, its global "Women and Opportunity" initiative and its "Women in Leadership" Network Group, but this is not enough to meet our criteria of 3 quality programs and there is no evidence that the company tracks the number of women participating in the professional development programmes offered.
		NOT MET: There is no evidence found to suggest the company collects sex-disaggregated data on percentage of employees promoted.
13. Occupational segregation	0	NOT MET: The company has 2 programs specifically targeted at women in the company, its global "Women and Opportunity" initiative and its "Women in Leadership" Network Group, but this is not enough to meet our criteria of 3 quality programs and there is no evidence that the company tracks the number of women participating in the professional development programmes offered.
14. Turnover and absenteeism	0	NOT MET: There is no evidence the company collects sex-disaggregated data on the annual turnover of employees.
		NOT MET: There is no evidence that company collects sex-disaggregated data on the annual absenteeism levels of employees

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
15. Gender equality in leadership in the supply chain	1	NOT MET: There is no evidence to suggest the company collects sex-disaggregated data by leadership level across the supply chain
		MET: The company's P.A.C.E. (Personal Advancement & Career Enhancement) program gives women in the apparel industry support in their personal and professional growth and tracks the number of participants.
16. Non-discrimination against pregnant and/or married women workers in the supply chain	1.5	MET: The company's Supplier Code of Conduct includes a clause prohibiting discrimination against pregnant AND married women
		NOT MET: There is no evidence that the company requires its suppliers to provide training (e.g. unconscious bias training) to its hiring managers to ensure a non-biased approach to the recruitment and promotion of married / pregnant women workers
		MET: The company is a founding member of the Empower@Work program, the curriculum of which includes discrimination, with a reference to marital status and pregnancy as protected characteristics.
17. Enabling environment for freedom of association and collective bargaining in the supply chain	2	MET: The company prohibits facilities from threatening, penalizing, restricting or interfering with workers lawful efforts to join associations of their choosing, carry out their union activities including union meetings, demonstrations, and lawful strikes.
		MET: The company supported workshops on freedom of association for its Cambodian suppliers and the unions represented in their facilities and is working with the ILO and Better Work Bangladesh on a social dialogue program that includes training on freedom of association, collective bargaining, international labour standards, and communication and negotiation techniques.
	1.5	MET: The company has made a commitment to advancing supplier diversity and its diverse vendor certification process includes women and LGBT own businesses

18. Gender-responsive procurement	NOT MET: There is no evidence that the company procures from women-owned businesses.
	MET: The company launched a "supplier inclusion program" in 2018 that provides a framework to increase its work with companies that are owned by or employ a large percentage of minorities, including women.

Compensation and Benefits (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
19. Gender pay gap	0	NOT MET: The company does not disclose gender pay gap for its global operations, although it has had had 3rd party verification of equal pay for equal work for men and women globally, this does not meet our gender pay gap requirement. The company has delivered data on gender pay gap on its UK operations, as required by law in the country.
		NOT MET: The company does not disclose its gender pay gap data by different pay bands for its global operations, although it has had had 3rd party verification of equal pay for equal work for men and women globally, this does not meet our gender pay gap requirement. The company has delivered data on its gender pay gap by different pay bands for its UK operations, as required by law in the country.
		NOT MET: There is no evidence that the company collects sex-disaggregated pay data by occupational function
		NOT MET: The company does not disclose other financial benefits as part of an analyse of its gender pay gap for its global operations. The company has disclosed other financial benefits gender pay gap data for its UK operations, as required by law in the country.
		NOT MET: Whilst the company has its methodology and data independently validated by a gender and diversity firm, this is to assess equal pay for equal work, rather than to undertake or verify its gender pay gap analysis.
		NOT MET: The company does not have a strategy and is not taking active steps to address any pay gaps identified, as its assessments are based on pay equity, rather than pay gaps.
20. Paid carer leave	0	NOT MET: There is no evidence that the company has a global policy of providing at least 14 weeks of paid primary carer leave for full-time employees.
		NOT MET: There is no evidence that the company implements concrete actions (excluding policies) that promote the return to work and retention of workers after primary care leave.
		NOT MET: There is no evidence that the company has a global policy of providing at least two weeks of secondary carer leave to full-time employees.
		NOT MET: There is no evidence to suggest that the company implements concrete actions that promote the uptake of secondary carer leave.
21. Childcare and other family support	1	PARTIALLY MET: The company offers access to care providers through Bright Horizon. However, there is no evidence the company offers any other family support to its employees (e.g. paid time off for breastfeeding and lactating, or paid time off to attend healthcare appointments with children/dependents).
22. Flexible work	0.5	PARTIALLY MET: The company offers flexible working hours, but there is no evidence that it tracks the uptake.
		NOT MET: There is no evidence that the company offers flexible work locations to its employees (e.g. the ability to work from home or telecommuting)

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
23. Formal contracts in the supply chain	0.5	NOT MET: The company only requires formal, written contracts for Foreign Contract Workers.
		PARTIALLY MET: The company requires facilities to engage in monitoring and verification of their handwork subcontractors to assess and address any risk associated with all sections of the COVC. However, there is no evidence that it takes other action, such as requiring suppliers to collect sex-disaggregated data by contract type.
24. Living wage in the supply chain	0	NOT MET: The company does not require its suppliers to pay their workers a living wage.
		NOT MET: There is no evidence to suggest that the company monitors the payment of living wages.
		NOT MET: Whilst the company does collaborate on advocacy work to push for appropriate wage-setting mechanisms in certain countries, to help ensure that minimum wage levels are updated on a regular basis to account for inflation and cost of living adjustments, it does not take specific actions to help ensure its suppliers pay their workers a living wage.
25. Family-friendly benefits provision in the supply chain	0	NOT MET: The company only requires maternity leave to be paid in accordance with national law, there is no evidence that it requires its suppliers to offer at least 14 weeks of paid primary carer leave to their workers.
		NOT MET: The company only requires benefit leave to be paid in accordance with national law and there is no evidence that it requires its suppliers to provide at least two weeks of paid secondary carer leave to their workers.
		NOT MET: The company only requires childcare provisions in accordance with national law
		NOT MET: There is no evidence that the company requires its suppliers to provide other family support to their workers.

Health and well-being (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
26. Health information and services for employees	1	NOT MET: There is no evidence regarding the costs covered for maternal health information and services, in countries where no or only partial government-funded support is provided.
		NOT MET: There is no evidence regarding the costs covered for sexual and reproductive health information and services, in countries where no or only partial government-funded support is provided.
		MET: The company provides all employees with access to a benefits concierge service, free short-term counselling, and a wide range of free and confidential mental health tools and resources.
		PARTIALLY MET: The company provides all employees, including those in the US, with access to health information and services in one of the three areas assessed (mental health). This provides a benefits concierge service, free short-term counselling, and a wide range of free and confidential mental health tools and resources.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
27. Safe and health work environment in the supply chain	1.5	<p>MET: The company requires its suppliers to address at least 4 of the specific health, safety and hygiene needs of their women workers, including:</p> <ul style="list-style-type: none"> - Regularly check company premises to ensure they are adequately lit and secure - Provide personal protective equipment - Provide access to clean drinking water - Accommodation for pregnancy and/or breastfeeding - Ensures adequate measures to prevent fatigue and long-term health problems to workers
		<p>MET: The company audits its suppliers for compliance with the Code of Vendor Conduct (COVC) before initial approval and then annually.</p>
		<p>PARTIALLY MET: The company supports suppliers in ensuring a gender-responsive, safe and healthy work environment for their workers through its participation in the collaborative initiative Empower@Work, which includes a module on occupational health and safety. However, no evidence that the company requires its suppliers to provide health and safety training to workers, ensuring a gender-responsive, safe and healthy work environment.</p>
28. Health information and services in the supply chain	1.5	<p>MET: The company has a target of reaching 1 million women and girls in the supply chain and communities through its P.A.C.E programme by 2022. The programme includes a module on general and reproductive health.</p>
		<p>NOT MET: There is no evidence that the company requires its suppliers to have a clean health room on-site with credentialed health providers.</p>
		<p>"MET: The company supports factories through modules adapted from Better World, its P.A.C.E. programme and HERproject, which has evolved to the collaborative program Empower@Work. These modules covers more than 3 of the gender-related health areas we assess for, including:</p> <ul style="list-style-type: none"> - Menstrual health - Family planning - Reproductive cancers - Maternal health - Hygiene - Nutrition - STIs/STDs - HIV/AIDs - Mental Health

Violence and harassment (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
29. Violence and harassment prevention	1	MET: The company has a Zero Means Zero Policy on discrimination, harassment and retaliation, within its Code of Business Conduct (COBC)
		NOT MET: Whilst the company provides all employees with general training on its Code of Business Conduct, it is unclear whether this violence and harassment are specifically covered.
		NOT MET: There is no evidence that the company takes additional actions to help prevent violence and harassment in the workplace.
30. Violence and harassment remediation	1	PARTIALLY MET: The company states that it will take appropriate corrective action, which may include termination, to address violations of its zero tolerance policy on harassment in the workplace. However, the process does not mention support for the aggrieved during/after remediation (e.g. leave from work, counselling/mental health support) or prohibit the inclusion of a confidentiality provision (non-disclosure/silencing agreement) in violence and harassment settlement agreements, unless requested by the victim.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
31. Violence and harassment prevention in the supply chain	1.5	MET: The company requires its suppliers to have a violence & harassment policy that covers their worker
		MET: The company requires that its supplier code of conduct, which includes prohibition of corporal punishment or any other form of physical or psychological coercion (including sexual abuse), to be posted in at least one conspicuous location in the facility that is regularly accessible to workers and is written in the predominant language(s) of the workers.
		NOT MET: There is no evidence that the company requires its suppliers to provide training on violence and harassment to its managers and workers.
		MET: The company has developed trainings to address gender-based discrimination and harassment, which it has delivered to 500 facilities (about 70% of all facilities).
32. Violence and harassment remediation in the supply chain	1.5	MET: The company monitors the remediation of grievances, including violence and harassment grievances, for factories that are part of its Workplace Cooperation Program (WCP).
		MET: The company requires its suppliers to have an effective remediation process for addressing grievances.
		NOT MET: There is no evidence that the company requires its suppliers to collect sex-disaggregated data on the remediation of violence and harassment grievances reported by their workers.

Marketplace (5% of total score)

MARKETPLACE

Indicator	Score (out of 2)	Assessment
33. Marketing content	1	NOT MET: There is no evidence that the company has a public commitment which addresses how gender stereotypes are portrayed in its marketing campaigns.
		MET: Two of the company's brands have launched marketing campaigns aimed at challenging gender norms. One that seeks to empower women and girls through athletics and one focused on gender-neutral clothing for young teens.

Community (5% of total score)

COMMUNITY

Indicator	Score (out of 2)	Assessment
34. Community support	2	<p>MET: The company supports or donates to initiatives focused on women's empowerment and gender equality.</p> <p>MET: The company continues to roll out its global P.A.C.E program in the communities and is midway through its 5 year commitment to Women + Water (W+W) Global Development Alliance with the United States Agency for International Development (USAID) to improve and sustain the health and well-being of women and communities touched by the apparel industry.</p> <p>MET: The company tracks the number of women and girls benefitting from its P.A.C.E programme.</p> <p>MET: 3rd parties have conducted impact assessment studies P.A.C.E to inform future programs.</p>

NB: "NOT MET" in the assessment above indicates WBA could not find information in public sources or the internal documents shared by the company to show that the company meets the requirements, as described in full in the Gender Benchmark Methodology Report 2020 and Scoring Guidelines 2021. This does not necessarily mean that the company is not taking any action under that indicator.