

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Gap
Sector Apparel (supply chain only)
Overall score 31.2 out of 100

Theme score	Out of	For theme
4.7	10	A. Governance and Policy Commitments
8.2	25	B. Embedding Respect and Human Rights Due Diligence
6.0	20	C. Remedies and Grievance Mechanisms
6.0	25	D. Performance: Company Human Rights Practices
6.2	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Universal Declaration of Human rights (UDHR): The Company is committed to 'respecting all human rights, as articulated in the Universal Declaration of Human Rights' [Human Rights Policy, N/A: gapinc-prod.azureedge.net] Score 2 <ul style="list-style-type: none"> Met: Commitment to UNGPs: The Company in its Human Right Policy (2020) commits to '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'. [Human Rights Policy, N/A: gapinc-prod.azureedge.net]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The HR policy commits to 'respecting all human rights, as articulated in the [...] International Labor organization's (ILO) Declaration on Fundamental Principles and Rights at Work'. [Human Rights Policy, N/A: gapinc-prod.azureedge.net] Met: Explicitly lists all four ILO core principles: In its Human Rights Policy, the Company states: 'We are committed to respecting the rights of our employees and workers in our supply chain, in accordance with the International Labor Organization's (ILO) Core Conventions as set out in the Declaration on Fundamental Principles and Rights at Work, including the freedom of association, the right to collective bargaining, and the right of all individuals not to be subject to forced labor, child labor, or discrimination. We expect our business partners, including

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			<p>suppliers, to adopt and adhere to similar values.' [Human Rights Policy, N/A: gapinc-prod.azureedge.net] & [Code of Business Conduct: gapinc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: The Company in its Human Right Policy (2020) states that its 'commitment applies globally to our operations, our products and services, and our business relationships, including our supply chain [...] We implement our human rights commitment through our Code of Vendor Conduct...'. And in its COVC the Company demand its business partners and sub-contractors to meet requirements related to freedom of association, prohibition of any kind of forced labour and child labour, and the elimination of discrimination in the workplace. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] & [Human Rights Policy, N/A: gapinc-prod.azureedge.net] • Met: Explicitly lists all four ILO core principles for suppliers: The Code of Vendor Conduct 'sets forth the following basic requirements: Regarding Discrimination in respect of employment and occupation the Company states 'The facility shall employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or belief'. On forced labour: 'not to use involuntary labor of any kind, including prison labor, debt bondage, slave labor, or forced labor by governments'. Concerning Child Labour: 'all workers shall meet the applicable legal minimum age requirements or are at least 15 years of age, whichever is greater'. Finally, the Company requires that ' 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'. Subsequently, the Company stipulates that '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'. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: The Company affirms that it is 'committed to providing a safe and healthy working environment for employees, customers, contractors and vendors' according to its 2019 Code of Business Conduct. [Code of Business Conduct: gapinc.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Company in its Code of Business Conduct includes two sections related to working hour issues, named, 'Recording your time' and 'Other work standards' where the employees 'are required to follow all applicable laws and regulations...'. However, no evidence was found of the Company explicitly committing to respect ILO conventions on working hours or publicly stating that workers are not required to work more than 48 hours as a regular working week and that overtime is consensual and paid at a premium rate. [Code of Business Conduct: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The Vendor Conduct requires to 'Comply with all applicable laws and regulations regarding working conditions and shall provide workers with a safe and healthy environment'. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Code of Vendor Conduct requires the following: 'The maximum allowable workers 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', regarding overtime hours the company requires its supplier to 'ensure that overtime hours not exceed legal limits or 12 hours in a week, whichever is lesser.' the Company also remarks the prohibition of involuntary overtime and requires overtime rates higher than the regular work rates. ('The facility shall support workers' refusal of overtime work without any threat of penalty, punishment, or dismissal. Under no circumstances shall a facility impose punitive measures such as salary deductions, apply coercion of any kind, deny future opportunities for overtime, or take disciplinary action against workers for refusing overtime [...] The facility shall pay overtime and any incentive (or piece) rates that meet all legal requirements or the local industry prevailing standard, whichever is greater. Hourly wage rates for overtime must be higher than the rates for the regular work shift.') However, there is no public evidence where the Company states its commitment to respect the Standard Week of a maximum of 48 hours. The Company has provided comments to CHRB regarding this subindicator, clarifying that the interpretation of the code of vendor conduct as follows: ' While language is slightly different from the requirement, the interpretation and our implementation is as follows: our policy ensures that the maximum allowable worker hours are 60 hours/week

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			(including overtime). The max overtime is 12 hours a week, which means 48 standard hours per week (60-12=48). The Company further clarifies that 'the COVC says that "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" (emphasis added). This means the maximum working hours could be less than 60 hours/week if mandated by law but never more than 60 hours/week. Similar language is used for overtime, so that overtime hours could be less than 12 hours/week if mandated by national law, but never more than 12 hours/week. This is in linWee with the ILO requirement of 48 hour standard work week and 12 hours overtime'. However, although this is a possible interpretation, current explicit requirements of the code leave room for other hour configuration that differs from 48 hours of maximum for regular working week. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net]
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commitment to women's rights: In its Human Rights Policy the Company states: 'we have signed the Women's Empowerment Principles and are implementing them throughout our operations and supply chain'. [Human Rights Policy, N/A: gapinc-prod.azureedge.net] Met: Expects suppliers to respect these rights: Migrant worker's rights: In its Code of Vendor Conduct the Company states: 'The facility shall ensure, if it recruits or employs Foreign Contract Workers, that these workers are treated fairly and on an equal basis with its local workers. [...] that migrant workers are not subject to any form of forced, compulsory, bonded, or indentured labour. [...] that all work must be voluntary and workers must be free to terminate their employment at any time, without penalty. [...] that migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up employment or preventing them from voluntarily terminating their employment' [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] Score 2 <ul style="list-style-type: none"> Met: Commitment refers to CEDAW/Women's Empowerment Principles: See above, the Company is signatory to the Women Empowerment Principles Met: Expects suppliers to respect these rights: As indicated above, the Company is committed to implement the WEPs through its supply chain.
A.1.4	Commitment to remedy	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commitment to remedy adverse HRs impacts: The Human Rights policy states that 'We are committed to providing access to an effective remedy in the event that we cause or contribute to an adverse impact'. [Human Rights Policy, N/A: gapinc-prod.azureedge.net] Met: Expects suppliers to make this commitment: It also indicates that 'This commitment applies globally to our own operations, our products and services, and our business relationships, including our supply chain'. [Human Rights Policy, N/A: gapinc-prod.azureedge.net] Score 2 <ul style="list-style-type: none"> Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The commitment also includes the following: 'This commitment extends to collaborating with others to find solutions and not obstructing access to other remedies that reduce human rights impacts'. No evidence found, however, of a commitment to collaborate with both judicial and non-judicial mechanisms. [Human Rights Policy, N/A: gapinc-prod.azureedge.net] Met: Commitment to work with suppliers on remedy: The Company in its Human Rights Policy 'We implement our human rights commitment through our Code of Vendor Conduct and enforce it through our assessment, remediation, capability building, and worker engagement programs at suppliers facilities [...] 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, N/A: gapinc-prod.azureedge.net]
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Zero tolerance of threats/attacks on HRDs: In its Code of Business Conduct the Company (COBC) includes a section about its Zero Tolerance For Retaliation Policy, which protects any 'employee who reports in good faith a suspected violation of the COBC, our policies or the law, or who participates in any investigation of a suspected violation'. However, this sub-indicator looks for a general commitment to not tolerate threats or attacks on Human rights defenders. [Code of Business Conduct: gapinc.com] Not Met: Expects suppliers to make this commitment

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			Score 2 <ul style="list-style-type: none"> Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board level responsibility for HRs: The Company has a Governance and Sustainability Board Committee. The Human Rights policy states that 'executive oversight and responsibility for the implementation of this policy rests with our Chief Legal, Compliance and Sustainability Officer. The Governance and Sustainability Committee of the Gap Inc. Board of Directors oversees the implementation of this policy at the board level'. [Website-Board Committee Composition, N/A: gapinc.com] Not Met: Describes HRs expertise of Board member Score 2 <ul style="list-style-type: none"> Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Process to review HRs strategy at board level: The ESG report states that 'Oversight of Gap Inc.'s ESG Program is overseen by the Governance and Sustainability Committee of the Board of Directors, which provides regular updates to the Board of Directors regarding Gap Inc.'s sustainability programs. To assist in its oversight responsibilities, the Governance and Sustainability Committee receives updates from our Chief Growth Transformation Officer'. [ESG Report 2021, 2022: gapinc-prod.azureedge.net] Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1 Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: At least one board member incentive linked to HRs commitments Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> Not Met: Performance criteria linked to HRs made public Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Board process to review business model and strategy for HRs risks Not Met: Describes frequency and triggers for reviewing business model Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1 Not Met: Example of actions resulting from reviews

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Score of 1 on A.1.2.a Met: Senior responsibility for HRs implementation and decision making: The 2021 ESG report defines the ESG team as 'the Gap Inc. central team that owns and supports all work related to the ESG issues impacting the company's performance.' Sally Gilligan as Chief Growth Transformation Officer oversees the ESG performance, and Judy Adler as ESG team VP leads the company's strategies with regard to sustainability (Climate change, Human Rights, Labour Rights, etc.). [ESG Report 2021, 2022: gapinc-prod.azureedge.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The HR policy states that 'In 2021, Gap Inc. transformed our organizational structure to place the ESG team within Gap Inc.'s SGO- Strategic Growth Office-, a unit of the company charged with thinking beyond its core business to meet the consumer and industry demands of the future. [...] The Governance and Sustainability Committee provides an independent perspective on our Sustainability Program in concert with our overarching strategic objective and oversees our internal ESG team's management of the Program' [Human Rights Policy, 06/2020: gapinc.sustainability.com] • Met: Day-to-day resources and expertise allocation in own operations: See above, the Company has a Strategic Growth office and an ESG team (which includes human rights). The report also states that 'Our organizational structure allows collaboration across key departments. Our ESG team works closely with our brands' Product and Marketing teams, as well as our Equality & Belonging, Human Resource, Supply Chain Strategy, Government Affairs, Legal and Gap Foundation teams, among others'. [ESG Report 2021, 2022: gapinc-prod.azureedge.net] • Not Met: Resources and expertise allocation in supply chain: In its 2021 ESG report the Company with regard to 'Human rights engagement in [its] Supply Chain declares: 'Our Supplier and Human Rights and Labor teams are responsible for managing and implementing our human rights and labor stakeholder engagement strategy'. However, no further details found (i.e. duties or actions taken, work between departments, composition, geographical allocation, etc.) [ESG Report 2021, 2022: gapinc-prod.azureedge.net]
B.1.2	Incentives and performance management	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: Senior manager incentives linked to HRs commitments: The Proxy Statement states that 'Our bonus program allows the Committee to assess Executives' individual performance, including whether Executives demonstrated our "Words to Live By," which are eight behaviors that reinforce our Company culture. In particular, "Champion Inclusion" and "Do the Right Thing" are aligned to our commitments on equality and belonging and environmental, social and governance.' Nevertheless, this subindicator is looking for specific criteria related to Human Rights issues that can be taken into account to calculate the compensation/incentives to senior managers. [Notice of Annual Meeting and proxy Statement, 10/05/2022: fis24.q4cdn.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	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"> • Met: HRs risks integrated as part of enterprise risk system: In its Risks Factors disclosure within its 2021 Annual Report, the Company explains: 'Risks associated with importing merchandise from foreign countries, including failure of our vendors to adhere to our Code of Vendor Conduct, could harm our business: We purchase merchandise from third-party vendors in many different countries, and we require those vendors to adhere to a Code of Vendor Conduct, which includes [...] labor, health, and safety standards. From time to time, our vendors and their suppliers may not be in compliance with these standards or applicable local laws. Although we have implemented policies and procedures to facilitate our compliance with laws and regulations relating to doing business in foreign markets and importing merchandise from and into various countries, there can be no assurance that our vendors and their suppliers and other third parties with whom we do business will not violate such laws and regulations or our policies. Significant or continuing noncompliance with such standards and laws by one or more vendors, suppliers or other third parties could subject us to liability, and could adversely affect our reputation, business and results of operations.' [2021 Annual Report, 2022: 2021-Gap-Inc.pdf (q4cdn.com)] • Met: Provides an example: See above. In addition, the Company integrates Human Rights Risks in its ERM- Enterprise Risk System- as a trigger to operational risks in its supply chain and reputational risk to its portfolio of brands. The 2021 ESG Report states that 'The labor practices and working conditions at the third-party suppliers that make apparel for Gap Inc. brands can affect reputation, business continuity, and operating costs for our brands and the company overall. [...] Excessive overtime, fire and structural safety, and gender-based violence are

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			<p>high-risk supply chain issues that we have specific programs in place to address'. [ESG Report 2021, 2022: gapinc-prod.azureedge.net]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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"> • Met: Score of 1 on A.1.2.a • Met: Communicates HRs policies to all workers in own operations: The Company in its California Transparency in Supply Chain Act Statement, states that 'Our Code of Business Conduct (COBC) requires our employees to act ethically and with integrity at all times. It also includes provisions on salient human rights issues. All employees are required to complete the Principles of Integrity: Code of Business Conduct Overview training course to ensure their understanding of our commitments'. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com] & [Code of Business Conduct: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a • Met: Describes steps to communicate HRs policies to supply chain: The 2021 ESG report states the following: 'We regularly engage with our suppliers to advocate for human rights and drive better practices. To enable a clear understanding of our Human Rights Policy, practices, and grievance channels, we provide all relevant information in local languages through an online platform and offer in-person and virtual support wherever needed'. Also, the code states that: 'The facility shall ensure there is a senior manager or management team member with designated responsibility [...] for ensuring that the facility meets COVC and legal requirements. In addition, 'vendors shall only use GAP Inc. approved facilities for the production of goods. Vendors shall obtain written authorization from GAP Inc. To use these facilities prior to the start of production. 'The ESG report indicates, As part of our Mill Sustainability Program, we communicated to our entire mill base our expectations of their social and environmental performance, which are requirements of doing business with us'. [ESG Report 2021, 2022: gapinc-prod.azureedge.net] & [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that 'Prior to accepting any order for a Gap Inc. branded product, our suppliers are required to sign our Vendor Compliance Agreement (VCA), a legally binding document that is a condition of doing business with Gap Inc'. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com] • Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers: The Code of Vendor Conduct, with regard to vendors' sub-contracting practices expresses that 'Vendors shall only use Gap Inc.-approved facilities for the production of goods. Vendors shall obtain written authorization from Gap Inc. to use these facilities prior to the start of production'. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net]
B.1.5	Training on Human Rights	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: Score of at least 1 on A.1.2.a • Met: Describes how workers are trained on HRs policy commitments: Gap Inc.'s California Transparency in Supply Chain Act Statement discloses that 'Our Code of Business Conduct (COBC) requires our employees to act ethically and with integrity at all times. It also includes provisions on salient human rights issues. All employees are required to complete the Principles of Integrity: Code of Business Conduct Overview training course to ensure their understanding of our commitments'. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com] • Met: Trains relevant managers including procurement on HRs: The ESG report states that 'Our dedicated Supplier Sustainability team trains global sourcing employees on human rights policies and procedures, building awareness on COVC requirements and ways to manage vendor performance'. Additionally, in its Supply Chain and Modern Slavery statement it discloses that 'Since 2018, we continued investing in trainings for our Supplier Sustainability team, largely focused on building their capacity to work with and train bi-partite committees in our strategic suppliers' facilities. We believe that by equipping bi-partite committees with the

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			<p>knowledge and expertise to identify and surface unacceptable labor practices in their places of work, we will see significant improvements in working conditions and labor standards [...] New employees within Gap Inc's sourcing organization receive training in our COVC, as they are another important touchpoint for our relationship with our sourcing facilities.' [ESG Report 2021, 2022: gapinc-prod.azureedge.net] & [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Met: Meets both requirements under score 1 • Met: Trains suppliers to meet HRs commitments: The California Transparency statement indicates that 'To supplement our own staff, Gap Inc. works to build the capabilities of our suppliers by conducting worker trainings, participating in multi-stakeholder initiatives and forging partnerships with expert stakeholders and suppliers to address specific human rights issues. For more than a decade, Gap Inc. field teams have been helping suppliers manage and improve the sustainability of their operations through social and labor capability building programs. As part of our long-range strategic plan for ESG, we have committed to deeper investments in both internal and external labor standards trainings for our business partners, and these trainings will include a forced labor component'. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com] • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	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: Score of at least 1 on A.1.2.a • Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company states on its website that 'Our approach to addressing labor conditions, facilitating greater partnerships with our suppliers and improving sustainability performance begins with assessments and facility audits. These are conducted by Gap Inc., ILO Better Work and the Social & Labor Convergence (SLCP) Program. Our Supplier Sustainability Assessment Manual outlines the protocols these teams use to assess and remediate issues related to labor or working conditions [...] We take a risk-based approach to assessing active manufacturers of our branded products [...] Each assessment includes interviews with managers, confidential interviews with workers, visual observations, and reviews of documents and records. We conduct announced, unannounced and semi-announced assessments. After each assessment, a color-coded rating is calculated based on criteria within five categories: Compliance with Laws, Environment, Labor Standards, Occupational Health and Safety, and Management Systems.' And in its 2021 ESG Report states that 'COBC [Code of Business Conduct] Assessments are conducted each year, with different markets/functions identified to assess. The objective of the COBC Assessments is to gain an understanding of the impact of the COBC program. With regards to its own operations the Company in its website declares that 'Our independent Internal Audit department completes reviews of our Global Supply Chain distribution centers and store locations throughout our networks to gauge procedural compliance'. The California transparency statement also indicates that 'Wherever we employ people directly, we do so in accordance with our Human Rights Policy, Code of Business Conduct and in compliance with local labor laws. Members of our store management team visit our retail stores on a regular basis to ensure that our policies are put into practice, and our asset protection and audit teams carry out annual assessments of our stores. Similar internal audit processes are carried out in respect to practices within our distribution centers'. [Website- Assessment and Remediation, N/A: gapinc.com] & [ESG Report 2021, 2022: gapinc-prod.azureedge.net] • Met: Discloses % of supply chain monitored: According to its website, the Company assessed 652 factories '(all sourcing countries, and factories were active during at least part of fiscal year)' out of 705, and audited to COVC 83% of its Tier 1 Suppliers and 68% of this audit were conducted by third-party organizations as ILO-IF Better Work and SLCP. [ESG Data, 2022: gapinc-prod.azureedge.net] • Met: Describes how workers are involved in monitoring: See above. The Company's staff is involved in the monitoring process. The Company in its California Transparency in Supply Chain Act Statement discloses that 'Gap Inc. conducts both announced and unannounced audits in the facilities we monitor, and these are primarily conducted by Gap Inc. staff.'. Additionally, in its public release, 'Gap Inc. Expands Gender-Based Violence Prevention Programs in Tamil Nadu', that 'workers will serve as trained peer educators and shop floor monitors trained to detect and report incidents of GBVH' in its suppliers' facilities and spinning mills. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>gapinc.com] & [Gap Inc. Expands Gender-Based Violence Prevention Programs in Tamil Nadu, 2022: gapinc-prod.azureedge.net]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Met: Describes corrective actions process: The Company in its website explains the requirements for facilities to submit corrective actions plans: 'The corrective action plan submitted by each facility must include the following information: (1) A plan to address findings that are noted in the assessment report from Gap Inc. (2) Specific corrective actions to eliminate the cause of the finding. This could include developing or updating written policies or procedures, capability-building and any other relevant actions. (3) If a root cause analysis has been conducted, corrective actions should target the root cause(s). (4) Information on who is accountable for each corrective action implementation at the facility. (5) A deadline for completing each corrective action.' [Website-Grievance Mechanisms, N/A: gapinc.com] • Met: Discloses findings and number of correction action processes: The Company in its 2021 ESG Report informs that 'For issues open as of 2/1/2021, 84 percent of corrective action plans were resolved by 2/1/2022' translated to absolute numbers, on 2/1/2021 were 2480 open issues regarding assessments against its COVC on sourcing countries and on 2/1/2022 this number was reduced to 403. [ESG Report 2021, 2022: gapinc-prod.azureedge.net]
B.1.7	Engaging and terminating business relationships	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: HRs performance affects selection suppliers: The Company states that 'We also have a vendor approval process that requires new suppliers for branded apparel product to undergo an assessment against our COVC prior to beginning production for Gap Inc. After the initial assessment of working conditions, the facility either earns approval or is placed in pending status while it addresses outstanding issues'. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com] • Met: HRs performance affects continuation supplier relationships: The Company states 'We monitor progress through follow-up assessments. Should there be outstanding or overdue issues, our Supplier Sustainability and Global Supply Chain teams escalate further intervention. However, if critical or severe issues remain unresolved, we may halt future order placement or discontinue the supplier relationship.' [Website- Assessment and Remediation, N/A: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes positive HRs incentives for business relationships: The Company indicates the following: 'We use a color-coded system to rate facilities' performance based on assessments. High performing facilities with no critical or few violations receive a green rating. Average performers are rated yellow, while facilities that need improvement on one or more serious issues are assigned a red rating. Critical, severe and key violations have a greater negative impact on a facilities' rating than more technical "non-compliance" violations. We decreased our share of red rated facilities from 16% in 2016 to less than 1% by the end of 2021 and have set a new goal to allocate at least 80% of our sourcing to green-rated factories by 2025'. On its website on purchasing practices the Company states that 'We also integrate sustainability into our purchasing decisions by including social and environmental factors on our vendor scorecard, including Code of Vendor Conduct (COVC) compliance, Higg Index and P.A.C.E. While some of these programs are voluntary, this integration incentivizes our facilities to participate in these programs to increase their score and gives our Sourcing teams visibility into vendors' performance on key metrics'. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com] & [Purchasing Practices, 2023: gapinc.com] • Met: Works with suppliers to meet HRs requirements: The Company in its 2021 ESG Report declares: 'Our dedicated Supplier Sustainability team trains global sourcing employees on human rights policies and procedures, building awareness on COVC requirements and ways to manage vendor performance. We also train and educate key vendors on how to implement measures that prevent COVC issues from arising [...] As a signatory to the SLCP, we support ways to improve working conditions in global supply chains by encouraging the wider adoption of the SLCP tool, which helps assess the social and labor performance of manufacturing facilities while reducing the duplication of industry efforts' [ESG Report 2021, 2022: gapinc-prod.azureedge.net]
B.1.8	Approach to engagement with affected stakeholders	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: Describes how workers and communities identified and engaged in the last two years: On its website, the Company shares that 'When an issue is reported

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>or found during our assessments, our global field teams develop a tailored remediation process that considers local contextual factors such as workers' education level, cultural norms, and ways of communication. For example, we may conduct interviews in workers' communities to better understand their needs, enabling us to more effectively address violations within our global supply chain.' Additionally, in its 2021 ESG Report, the Company discloses that its 'confidential COBC hotline' is 'available 24/7 to employees and anyone who conducts business with Gap Inc. or is affected by our business'. However, no evidence found on the process to proactively identify affected stakeholders with whom to engage on human rights. [Website- Assessment and Remediation, N/A: gapinc.com] & [ESG Report 2021, 2022: gapinc-prod.azureedge.net]</p> <ul style="list-style-type: none"> • Not Met: Discloses stakeholders whose HRs may be affected • Met: Provides two examples of engagement with stakeholders: On its website the Company shares that in 2022 signed a 'three-year agreement with Tamil Nadu textile and Common Workers Union (TTCU), Asia Floor Wage Alliance (AFWA), Global Labor Justice-International Labor Rights Forum (GLJ-IRLF) along with other global apparel brands, to jointly develop a new program to help prevent and remediate gender-based violence and harassment (GBVH) at Natchi Apparel, a factory and spinning mill operated by Eastman Exports in India.' Additionally, the Company shares in its 2021 ESG: 'We routinely engage with workers in our Tier 1 supply chain through our assessments, including formal interviews, and through the informal relationships that our teams have created with worker representatives. We also encourage the people who work in our supply chain to share their thoughts and experiences, and we use digital technology to make the feedback process as easy as possible. These regular check-ins enable us to learn about specific human rights issues or to mitigate any risks proactively'. [Gap Inc. Expands Gender-Based Violence Prevention Programs in Tamil Nadu, 2022: gapinc-prod.azureedge.net] & [ESG Report 2021, 2022: gapinc-prod.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Describes process of identifying risks in own operations • Met: Describes process for identifying risks in business relationships: The Company declares that 'Gap Inc. works with governments, NGOs, and trade unions, and monitors resources –such as the U.S. Department of State's Trafficking in Persons Annual Report and the Global Slavery Index– to identify high-risk areas in our supply chain. We adopt a comprehensive view of the industry and areas of risk and focus our efforts on where we do business and where our programs can have the greatest impact'. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances • Met: Describes risks identified in relation to new circumstances: The California Transparency statement indicates that 'Further, we have built a map of our suppliers' Tier 2 textile mill locations and have conducted due diligence in textile mills that are located in areas that are deemed high risk. On its website discloses the results of the risk assessment on foreign contract workers 'this revealed that South Korea and Taiwan had a higher proportion of foreign contract workers (Turkey had none), the country contexts differed. Whereas 10 of 14 mills in South Korea reported employing a total of 100 foreign contract workers, 22 of the 23 mills we surveyed in Taiwan employed more than 1,700 foreign contract workers. In addition, Taiwan's regulation and enforcement of these workers' rights were not consistently applied. Certain sectors in Taiwan struggle with a labor shortage, and while the law stipulates that facilities can hire a 1:3 ratio of foreign contract workers to local workers, that policy is not always strongly enforced.' [Website- Our Approach to Protecting the Rights of Foreign Contract Workers in Tier 2 Mills , N/A: gapinc.com] & [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing 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: Describes assessment process and discloses salient HRs risks: The Company lists its salient issues. Specifically, it lists 'Our Key Human Rights Issue: Child Labor and Young Workers; Discrimination and Harassment; Wages and Benefits; Fire, Building and Electrical Safety; Grievance Mechanisms; Short-Term Contracts; Human Trafficking and Forced Labor; Working Hours; Humane Treatment; Freedom of Association; Foreign Contract Workers and Recruitment; Unauthorized Subcontracting .' It further notes that 'Excessive overtime, fire and structural safety, and gender-based violence are high-risk supply chain issues that we have specific programs in place to address. The human rights impact of these risks can be severe, while these issues can also present operational risk to our supply chain and reputational risk to our portfolio of brands.' The Company on its website declares that 'We have several systems and procedures to identify and manage risks, including those related to human rights and labor, environmental impacts, and other sustainability issues. To prioritize risks and opportunities, we use tools such as our sustainability materiality assessment. At the enterprise level, The Risk Committee, made up of leaders that represent the Senior Leadership team, provides oversight of the annual Enterprise Risk Assessment (ERA) process. The ERA begins with our Internal Audit team, who conducts an annual risk-assessment survey of more than 60 of the company's top executives and Board members. The team also interviews a subset of these executives every quarter. The Risk Committee uses these interviews, as well as a review of external factors affecting our company and industry, to develop heat maps that prioritize risks based on the likelihood and severity of their potential impact on the company's strategic initiatives and business operations. The CEO, Board of Directors and Senior Leadership team sign off and use the ERA to monitor and mitigate risks, as well as to update policies and include in Business Continuity Planning where required.' However, no evidence was found in which the Company describes how geographical, economic, social and other relevant factors are taken into account within this process. [Responsible Business Practices, N/A: gapinc.com] & [ESG Report 2021, 2022: gapinc-prod.azureedge.net] • Not Met: Describes how process applies to supply chain: Gap, Inc. 2021 ESG Report while describing the Company's Risk Management discloses: We also develop country-specific strategies that take into consideration local context, and we are setting up a new Risk Intelligence Office to focus on supply chain-related risks.' Nevertheless, no evidence regarding the process of assessment of Human Rights Risks in the Company's Supply Chain to determine saliency was found. [ESG Report 2021, 2022: gapinc-prod.azureedge.net] • Not Met: Public disclosure of results of HRs risk assessment: The Company in its COVC Findings 2015-2021 document discloses the results of its Audits of facilities against its COVC related to topics such as child labour, forced labour, discrimination, working hours, wages and benefits, freedom of association, health and safety, foreign contract labour among others. The findings are disaggregated by sourcing countries (e.g. Bangladesh, Cambodia, China, Guatemala, India etc.). However, those results are related to non-compliance issues found during its audit processes, and the evidence this sub-indicator is looking for is the results of Human Right Risk Assessments, including which are the specific issues that the Company considers to be salient. [2015-2021 COVC Findings, 2022: gapinc-prod.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Describes system to prevent, mitigate and remediate HRs issues: The Company has set up its Assessment and Remediation Program in order to address 'labor conditions, facilitating greater partnerships with our suppliers and improving sustainability performance'. Nevertheless, no evidence with regard to a Global System/Action Plan to prevent, mitigate or remediate its salient human rights issues was found. [Website- Assessment and Remediation, N/A: gapinc.com] • Not Met: Describes how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HRs issue: The Company on its website states 'Over the years, our regular facility assessments have revealed violations related to gender-based discrimination and harassment. We recognize that it's not enough to rely solely on auditing to detect and address these issues, which is why we developed our GBV Prevention and Response Program with Better

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Work to help enforce our zero-tolerance policy on physical, psychological, and sexual harassment.' [Website- Child Labor and Young Workers, N/A: gapinc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company indicates that 'We also have developed a comprehensive suite of programs that provide myriad workplace benefits and channels where workers can effectively raise grievances. Within each program, workers are given a voice to raise concerns with facility management and outside parties, via various channels: Our Workforce Engagement Program [...] Our Workplace Cooperation Program [...] Our Assessment and Remediation Program [...] Our Code of Business Conduct Hotline...' [Website- Grievance Mechanisms, N/A: gapinc.com] Score 2 <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and workers made aware: The Company indicates on its website (Section about policies and approaches for Human Rights) that: 'Our Code of Business Conduct Hotline is available to employees of both Gap Inc. and our suppliers. It provides a secure and confidential, telephone and web-based reporting system- 24 hours a day, seven days a week- and is managed by an independent, third-party vendor. Interpreters are available [...]. The California Transparency Act Statement indicates that 'All employees are required to complete the Principles of Integrity: Code of Business Conduct Overview training course to ensure their understanding of our commitments'. The Code contains a section on speaking up and the hotline. [Website-Grievance Mechanisms, N/A: gapinc.com] & [Website- Capability Building Programs, N/A: gapinc.com] • Met: Describes how workers in supply chain access grievance mechanism: See above. Also, the Company in Its Website (Section about policies and approaches for Human Rights) states: 'We require facilities to provide a confidential and anonymous channel for workers to express grievances without fear of retaliation. The grievance process must allow for a timely response, with documentation, and an action plan to address the issue. Our field team trains factory workers and managers on establishing and using grievance mechanisms.' [Website-Grievance Mechanisms, N/A: gapinc.com] • Met: Expects suppliers to convey expectation to their suppliers: The COVC states that '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'. it also adds that: 'Vendors shall only use Gap Inc.-approved facilities for the production of goods. Vendors shall obtain written authorization from Gap Inc. to use these facilities prior to the start of production'. Sub-contracted facilities need to follow the COVC: 'The facility shall engage in monitoring and verification of their handwork subcontractors to assess and address any risk associated with all sections of the COVC'. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance mechanism(s) for external individuals and communities	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"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company states on its website that: 'Additionally, we are responsive to third parties that raise grievances with us via any of our communication channels'. [Website-Grievance Mechanisms, N/A: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company on its Website (Section about policies and approaches for Human Rights) states: 'Our Code of Business Conduct Hotline is available to employees of both Gap Inc. and our suppliers. It provides a secure and confidential, telephone and web-based reporting system- 24 hours a day, seven days a week- and is managed by an independent, third-party vendor. Interpreters are available, and calls and web submissions are free, confidential, and may be made anonymously. This hotline is utilized by employees in our suppliers' factories.' Nevertheless no explicit evidence of endeavour from the Company to make aware all affected external stakeholders of the availability of these grievance mechanisms. [Website-Grievance Mechanisms, N/A: gapinc.com] • Not Met: Describes how external individuals/communities access grievance mechanism: The Company on Its Website (Section about policies and approaches for Human Rights) states: 'Our Code of Business Conduct Hotline is available to employees of both Gap Inc. and our suppliers. It provides a secure and confidential, telephone and web-based reporting system- 24 hours a day, seven days a week- and is managed by an independent, third-party vendor. Interpreters are available, and calls and web submissions are free, confidential, and may be made anonymously [...] Additionally, we are responsive to third parties that raise grievances with us via any of our communication channels.' However, it is not clear that suppliers' external individuals and communities have access to the company's own grievance mechanism or the company's suppliers' grievance mechanisms. [Website-Grievance Mechanisms, N/A: gapinc.com] • Not Met: Expects supplier to convey expectation to their suppliers
C.3	Users are involved in the design and performance of the mechanism(s)	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: Describes how users engaged on design and performance: The Company in its 2021 ESG Report declares 'We routinely engage with workers in our Tier 1 supply chain through our assessments, including formal interviews, and through the informal relationships that our teams have created with worker representatives. We also encourage the people who work in our supply chain to share their thoughts and experiences, and we use digital technology to make the feedback process as easy as possible. These regular check-ins enable us to learn about specific human rights issues or to mitigate any risks proactively. In addition, we interview workers as we develop and improve our programs focused on workers' rights and empowering women.' Nevertheless, no evidence was found regarding specific procedures or methods for the design and performance of the grievance mechanisms that had been suggested for the potential or actual users, or as a result of consultative processes with them. [ESG Report 2021, 2022: gapinc-prod.azureedge.net] • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism: The Company in its Capability Building Program website states 'We take a holistic approach to working with factories and our partners, aiming to catalyze improvements in workers' grievance mechanisms, gender equity in leadership, safety, and well-being, and more [...] Our Workforce Engagement Program (WEP) mobile tools support all of our capability-building programs. The mobile technology allows our suppliers to deliver important information and training, and it also provides a platform for workers to raise grievances and share their feedback with facilities.' However, it no evidence found on whether and how users of the grievance mechanism are engaged as part of the process to improve mechanism. [Website- Capability Building Programs, N/A: gapinc.com] • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly	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: Describes procedure and timescales for managing complaints or concerns: The Company states on its Assessment and Remediation website that 'When a grievance channel, assessment, external stakeholder or other reporting mechanism reveals a serious issue or allegation impacting worker rights, we begin

Indicator Code	Indicator name	Score (out of 2)	Explanation
	available and explained		<p>processing immediately, but may take up to one week. Once a request has been received, the relevant parties, including our internal business, will be notified of the issue's status and immediate next steps. Our local Supplier Sustainability team assesses the risk to determine the responsible party or parties and conduct further investigations and due diligence'. No further details found, including timescales for managing complaints and procedures for informing the complainant throughout the process. [Website- Assessment and Remediation, N/A: gapinc.com]</p> <ul style="list-style-type: none"> • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators: The Company states that 'Within each program, workers are given a voice to raise concerns with facility management and outside parties, via various channels [...] Our Supplier Sustainability team provides contact information to workers in the facilities from which we source, so they are able to reach out to Gap Inc. directly if there are issues that require our attention.' Nevertheless, the Company does not describe any procedures that allow complainants to escalate or challenge the outcomes of the complaint. [Website-Grievance Mechanisms, N/A: gapinc.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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"> • Met: Public statement prohibiting retaliation against workers/stakeholders: The Company in its Code of Business Conduct (COBC) states 'The COBC Hotline is free, confidential and available online and by telephone, 24 hours a day, seven days a week, around the world (interpreters are available). You may choose to report a concern anonymously. Anyone who reports a concern in good faith is protected from retaliation [...] We do not tolerate retaliation against any employee who reports in good faith a suspected violation of the COBC, our policies or the law, or who participates in any investigation of a suspected violation. Managers are prohibited from taking an adverse employment action against an employee for raising a COBC or legal concern'. [Code of Business Conduct: gapinc.com] • Met: Describes practical measures to prevent retaliation: The Code of business conduct states that 'The COBC Hotline is free, confidential and available online and by telephone, 24 hours a day, seven days a week, around the world (interpreters are available). You may choose to report a concern anonymously. Anyone who reports a concern in good faith is protected from retaliation'. [Code of Business Conduct: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence: The Company in its COBC declares 'We do not tolerate retaliation against any employee who reports in good faith a suspected violation of the COBC, our policies or the law, or who participates in any investigation of a suspected violation. Managers are prohibited from taking an adverse employment action against an employee for raising a COBC or legal concern [...] Prohibited retaliation includes, but is not limited to, demotion, pay decrease, termination, reassignment or failure to promote. However, no specific commitment to non-retaliate in the specific terms required by this subindicator. [Code of Business Conduct: gapinc.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The company in its Code of Vendors Conduct states 'The facility shall ensure that such grievance channels and mechanisms for resolving disputes and grievances provide for protection from retaliation. 'However, no evidence found of expectation from suppliers to prohibit retaliation against external stakeholders filling complaints in relation to suppliers behaviour. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	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"> • Met: Describes how remedy would be provided if no adverse impact identified: The Company states on its website that 'If our team identifies any issues, we require facilities to implement corrective action plans and evaluate their performance. We provide all of our suppliers with information on how to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>effectively operate and manage grievance mechanisms. Key elements include information on: how effective grievance mechanisms can play an important role in identifying, preventing and remediating issues of concern on the facility floor; how facility-level grievance mechanisms can help support workers' ability to raise concerns and seek remedy in the workplace; and how mechanisms can enable facility management to understand and address issues before they escalate into bigger issues. And in its Assessment and Remediation website declares 'If the issue is a violation of our COVC or a breach our Human Rights Policy, the parties are informed of the results of any investigation, and corrective action plans are developed that include follow-up with management on any additional remedial actions taken. Gap Inc. considers the grievance or complaint closed when the issue has been resolved and Gap Inc. has determined through its Assessment and Remediation framework that the appropriate remedy has been provided in accordance with our COVC and Human Rights Policy expectations. And also, in its Child Labor and Young Workers website affirms '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; and requiring the offending supplier to pay for all remediation costs'. [Website-Assessment and Remediation, N/A: gapinc.com] & [Website-Grievance Mechanisms, N/A: gapinc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy: The Company in its Assessment and Remediation website states 'If the issue is a violation of our COVC or a breach our Human Rights Policy, the parties are informed of the results of any investigation, and corrective action plans are developed that include follow-up with management on any additional remedial actions taken. Gap Inc. considers the grievance or complaint closed when the issue has been resolved and Gap Inc. has determined through its Assessment and Remediation framework that the appropriate remedy has been provided in accordance with our COVC and Human Rights Policy expectations. However, no details found on the actual approach to monitor the implementation of agreed remedy. [Website- Assessment and Remediation, N/A: gapinc.com] • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The Capability Building Program website posts 'Since 2017: 3,361 grievances raised and 97% resolved within the same quarter'. The Grievance Mechanisms website states 'We assess grievances raised via this program [The Workplace Cooperation Program], including the amount of time taken to remediate, channels used and outcomes. As of 2020, through the grievance channels developed as result of this program, a total of 22,800 grievances were raised, with 92% of the total grievances resolved so far. 'In its 2021 ESG Report informs 'By the end of 2021, 84 percent of COVC issues had been resolved. We resolve these violations by integrating this work into our sourcing decisions, which drives increased vendor ownership in resolving issues promptly.' Nevertheless, No information was found about the specific grievances related to human rights issues. [Website- Capability Building Programs, N/A: gapinc.com] & [Website-Grievance Mechanisms, N/A: gapinc.com] • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result: The Grievance mechanism website informs 'Our Assessment and Remediation program evaluates the efficacy and use of grievance mechanisms.' However, there is no public evidence available regarding the actual process followed and changes made as a result of reviewing the effectiveness of grievance mechanisms. [Website-Grievance Mechanisms, N/A: gapinc.com] & [ESG Report 2021, 2022: gapinc-prod.azureedge.net] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders: The Assessment and Remediation websites affirms 'We monitor progress through follow-up assessments. Should there be outstanding or overdue issues, our Supplier Sustainability and Global Supply Chain teams escalate further

Indicator Code	Indicator name	Score (out of 2)	Explanation
			intervention. However, if critical or severe issues remain unresolved, we may halt future order placement or discontinue the supplier relationship'. However, it is not clear how it addresses unresolved matters against the outcomes agreed with the affected stakeholder. [Website- Assessment and Remediation, N/A: gapinc.com]

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	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: Requirements on living wage in supplier codes and contracts: The code of vendor conduct states that 'The facility shall pay wages and overtime premiums in compliance with all applicable laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater. The facility is encouraged to provide wages and benefits that are sufficient to cover workers' basic needs and some discretionary income'. Nevertheless, no public evidence was found of the Company requiring suppliers to disclose a time-bound target to pay all workers a living wage nor including requirements to pay all workers a living wage (basic needs + some discretionary for employees and his/her family or depends). [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] • Not Met: Describes work with suppliers on living wage <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.2	Aligning purchasing decisions with human rights	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: Describes practices to avoid price or short notice requirements that undermine HRs: The Company declares that 'We have taken steps to improve our purchasing practices, including our participation in Better Buying, an initiative that helps us understand the impact of our purchasing decisions and practices, as well as other aspects of the design and development process. Our sourcing teams use this information to develop systems that place orders depending on our suppliers' capabilities to fulfil them'. However, no evidence about specific operational practices was found. [Website: Purchasing Practices, N/A: gapinc.com] • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices
D.2.3	Mapping and disclosing the supply chain	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"> • Met: Identifies direct and indirect suppliers including manufacturing sites: The Company states that 'As of January 29, 2022 we sourced from 705 Tier 1 branded-apparel supplier facilities, defined as direct-relationship cut-and-sew facilities and their associated embroidery, laundry and screen-printing facilities. We have mapped out 231 mill facilities (Tier 2) that represent about 65 percent of our business. [ESG Report 2021, 2022: gapinc-prod.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined: The Company discloses the name of its 'strategic facilities' (defined in its 2021 ESG Report as 'those representing 80 percent of our total business spend') on its Factory List. However, this list does not include the indirect supplier that the Company calls 'Strategic mills' or '2 Tier strategic suppliers'. Additionally, The Company in its California Transparency in Supply Chains Act and UK Modern Slavery Act Statement declares 'Further, we have built a map of our suppliers' Tier 2 textile mill locations and have conducted due diligence in textile mills that are located in areas that are deemed high risk. In 2020, we communicated responsible recruitment requirements to Tier 2 mills in Taiwan and South Korea where there is elevated risk to foreign contract workers [...] In addition to helping us identify UAS and foreign contract workers, risk-mapping has identified the risks that refugee workers may face'. It is not clear, however, that the Company discloses names and locations of indirect suppliers, representing the most significant parts of its supply chain (significant parts to be determined by the Company). [Gap Inc. Factory List, 10/2022: gapinc.com] & [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities: The Company in its California Transparency in Supply Chains Act and UK Modern Slavery Act Statement declares 'Further, we have built a map of our suppliers' Tier 2 textile mill locations and have conducted due diligence in textile mills that are located in areas that are deemed high risk. In 2020, we communicated responsible recruitment requirements to Tier 2 mills in Taiwan and South Korea where there is elevated risk to foreign contract workers [...] In addition to helping us identify UAS and foreign contract workers, risk-mapping has identified the risks that refugee workers may face'. However, no evidence found of these being disclosed (names and locations). [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com]
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on child labour in supplier codes and contracts: The Code of Vendor Conduct states 'All workers shall meet the applicable legal minimum age requirements or are at least 15 years of age, whichever is greater. If the minimum legal age is higher under local law, the higher age applies. [...]. Facility management shall have a rigorous age verification procedure that includes maintaining copies of official government-authenticated documentation for every worker and confirmation of the worker's date of birth. In countries where official proof-of-age documents, birth certificates, or government-issued IDs are not available, the facility shall employ independent and reliable means for determining workers' age [...].' Additionally in its Child Labor and Young Workers website It states '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; and requiring the offending supplier to pay for all remediation costs'. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] & [Website- Child Labor and Young Workers, N/A: gapinc.com] • Not Met: Describes work with suppliers on eliminating child labour: The Company indicates on its website that 'We do recognize that it [child labour] is a deeply complex issue that is inextricable from the broader issues of poverty and economic development. Our Human Rights Policy and our COVC explicitly prohibit the use of child labor. We require our supplier facilities to establish robust age-verification processes to prevent employment of children or underage workers. We also work to ensure that facilities respect local laws and international standards related to employing younger workers who are not children. During facility visits, our Supplier Sustainability team interviews workers and managers about recruitment and hiring, labor practices and working conditions for young workers. They check for lawful, unaltered documents to verify workers' ages since workers can go to great lengths to obtain counterfeit documents'. Even though there is public evidence that the Company monitors its suppliers on child labour issues, no evidence about how the Company works with (e.g. training, support, joint project etc.) the suppliers on this matter was found. [Website- Child Labor and Young Workers, N/A: gapinc.com] & [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Assessment of scope of child labour in supply chain: The Company in its Code of Vendor Conduct Findings from 2015 to 2021 shows that in 2021 0 out of 705 assessed facilities employed 'workers below the legal minimum age or 15, whichever is higher'. Also displays that 0,3% of the assessed facilities 'does not comply with child labor laws, including working hours and conditions'. In 2015 0,3% of the total assessed facilities (1003 facilities) employed 'workers below the legal minimum age or 15, whichever is higher' and 1% did not 'comply with child labor laws, including working hours and conditions'. [2015-2021 COVC Findings, 2022: gapinc-prod.azureedge.net] • Met: Analysis of trends demonstrating progress: See above, the Company discloses figures for the period 2015-2021 [2015-2021 COVC Findings, 2022: gapinc-prod.azureedge.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	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: Requirements on debt/fees in supplier codes and contracts: The Code of Vendor Conduct states that 'The facility shall allow workers full and complete control over earnings and shall not withhold any "guarantee money" or recruitment fee sums from pay otherwise due to Foreign Contract Workers [...]The facility shall pay all fees and costs payable to the Foreign Contract Workers' home government for the documentation of their deployment to the host country, including recruitment agency fees, visa fees, medical checks, and any costs that are not the legal responsibility of the worker. The facility shall not at any point deduct from wages, charge workers or otherwise accept reimbursement to re-coup these fees (including those payable to the home government)'. The code also states that 'the facility shall maintain documentation demonstrating third-party employment agencies' abide to relevant laws and the COVC'. It is not clear, however, that there's a requirement against recruitment fees against any worker, not only migrants. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] • Not Met: Describes work with suppliers on debt/fees for job seekers/workers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain: The Company indicates that in 2022, 1% of its factories did not comply with the requirement of 'Facility does not provide adequate employment contract and/or orientation for FCWs, does not pay all host country/recruitment/.' However, the sub-indicator seeks evidence that the Company is aware of the number of individuals affected specifically in relation to recruitment fees and costs. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net] • Not Met: Analysis of trends demonstrating progress: The COVC Findings (2020-2022) reveal the percentage of its factories that exhibit certain issues related to foreign contract workers (FCWs). These issues include not providing adequate employment contracts and/or orientation for FCWs, not fully covering host country/recruitment/return fees, passport restrictions, lack of proper records for FCWs, and engaging in discriminatory practices against FCWs. The percentages reported were 1% in 2020, 0% in 2021, and 1% in 2022. However, This indicator specifically focuses on obtaining figures related to recruitment fees and costs. CHRB methodology addresses three different indicators that pertain to various forms of forced labour violations, which include recruitment fees and costs, wage practices, and worker restrictions (such as document retention and freedom of movement, among others). [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net]
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	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: Requirements on paying in full and on time in supplier codes and contracts: The Code of Vendor Conduct requires that 'The facility shall ensure that workers are paid directly and at least once per month within no more than 31 days after the end of the previous month or within the legally mandated period, whichever is earlier. The facility shall ensure payments must be made in cash, and "in-kind" payments are prohibited [...] The facility shall ensure that deductions from wages as a disciplinary measure are not permitted, including wage deductions for tardiness that exceed the wage equivalent of actual time missed.' The Company indicates on its website that 'To monitor that workers receive the full wages and benefits they have earned, our Supplier Sustainability team reviews factory records, interviews management and workers, and provides training on policies and practices. The website also adds: 'Paying people fully for their work. An important area of focus for us has been working with our suppliers so that appropriate wages are provided to the people who make our products. This means workers are paid what they owed for their work'. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] & [Website- Wages and Benefits, N/A: gapinc.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time: The Company indicates on its website that 'To monitor that workers receive the full wages and benefits they have earned, our Supplier Sustainability team reviews factory records, interviews management and workers, and provides training on policies and practices. This includes assessing such factors as production quotas and piece rates, wage calculations and statements, contract terms, and leave and holidays'. However, not details found on specific training or actions conducted to help improving. Evidence found focuses in items assessed as part of compliance monitoring. [Website- Wages and Benefits, N/A: gapinc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain: The Company disclosed the percentage of factories that have violated the Company's requirements related to 'minimum/local industry wages, wage statements, overtime payment, benefits, leave procedures, severance, and other factors, including on-time and full payments.' However, the sub-indicator seeks evidence that the Company is aware of the number of individuals affected by these practices. Current evidence refers to the percentage of factories found in non-compliance. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net] • Met: Analysis of trends demonstrating progress: Gap Inc. COVC Findings (2020-2022) discloses the percentage of its Company's factories that violate the requirements related to 'minimum/local industry wages, wage statements, overtime payment, benefits, leave procedures, severance'. In 2020 the percentage was 55%, 22% in 2021 and 41% in 2022. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net]
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	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: Requirements on free movement in supplier codes and contracts: The Code of Vendor Conduct declares that '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, N/A: gapinc-prod.azureedge.net] • Not Met: Describes working with suppliers on free movement of workers: The Company states that 'We consider the following within our Forced Labor standards: forced labor, free egress, restrictions to voluntarily ending employment and restrictions on worker movement. In the event, our assessments reveal a facility in violation of these standards, our Supplier Sustainability team works with factory management, local stakeholders, and worker-representative organizations to create a corrective action plan, conducts follow-up visits to validate remediation is completed and educates workers on their right to free movement.' However, this sub-indicator is looking for specific operational practices (training, support, joint projects, etc.) that help its suppliers to improve its performance on this matter. [California Transparency in Supply Chains Act & UK Modern Slavery Act Statement, N/A: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain: The Company has provided comments to CHRB regarding this subindicator, referring to data described below. However, this The sub-indicator seeks evidence that the Company is aware of the number of individuals affected by these practices, rather than the number of factors where these issues were uncovered. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net] • Met: Analysis of trends demonstrating progress: The Company in its Code of Vendor Conduct Findings from 2015 to 2021 shows that in 2021 0% out of 705 assessed facilities imposed 'restrictions to voluntarily ending employment' and 0,1% did not 'monitor handwork supply chain, wherever applicable'. In 2015 0,1% of the total assessed facilities (1003 facilities) imposed 'restrictions to voluntarily ending employment' and 0,6% used involuntary labor' and 0,2% did not 'monitor handwork supply chain, wherever applicable'. [2015-2021 COVC Findings, 2022: gapinc-prod.azureedge.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	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: Requirements on FoA/CB in suppliers codes and contracts: The Code of Vendor Conduct declares '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. [...], the facility shall ensure that workers have the right to negotiate a collective bargaining agreement. If a collective bargaining agreement exists, the facility shall comply with all contractual provisions. [...] The facility shall not threaten, penalize, restrict, or interfere with workers lawful efforts to join associations of their choosing, carry out their union activities including union meetings, demonstrations, and lawful strikes. [...], the facility shall ensure worker representatives are not discriminated against and have regular access to company management in order to address grievances and other issues'. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] • Not Met: Describes work with suppliers on FoA/CB: The Company in its Freedom of Association Website states that 'We use a wide range of approaches in seeking to ensure that the rights of freedom of association are respected, from supporting open dialogue between facility workers and managers to partnering with workers' rights groups and trade unions when appropriate. In January 2018, we joined with The Arbitration Council and ILO Better Factories Cambodia to lead a workshop on freedom of association for our Cambodian suppliers and the unions represented in their facilities. The purpose was to improve employee-employer relationships through a mutual understanding of freedom of association, workplace cooperation, and dispute-prevention and -resolution mechanisms in the workplace. This workshop included in-depth trainings for factory management, union representatives and other worker representatives on how they can better partner to jointly resolve workplace disputes.' However, the evidence is not within the three-year timeframe required by the CHRB methodology. [Website-Freedom of Association, N/A: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Assessment of scope of restriction of FoA/CB in supply chain: The 2015-2021 COVC Findings document displays that 0% out of 705 facilities assessed have presented cases of blocking attempts from the workers to associates. [2015-2021 COVC Findings, 2022: gapinc-prod.azureedge.net] • Met: Analysis of trends demonstrating progress: The Company in its 2015-2021 COVC Findings displays that 0% out of 705 facilities assessed have presented cases of blocking attempts from the workers to associates, against the 0,2% out of 1003 in 2015. [2015-2021 COVC Findings, 2022: gapinc-prod.azureedge.net]
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	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: Requirements on H&S in supplier codes and contracts: On its Code of Vendor Conduct, the Company states in its section Occupational Health and Safety that 'The facility shall comply with all applicable laws and/or manufacturer instructions regarding working conditions, including personal protective equipment, machine safety, chemical handling and safety, first aid, medical care, food service, emergency preparedness, fire safety, structural, and electrical safety'. The section encompasses requirements related to lightning, floor safety, ventilation, personal protective equipment, machine/equipment safety, first aid and medical facility, drinking water, exits/exit routes/emergency routes, fire detection and alarm systems, electrical safety, fire fighting equipment, emergency procedures and evacuation drills, etc. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes work with suppliers of H&S: The Company in its Fire, Building and Electrical Safety website informs 'We established our fire, building and electrical safety (FB+ES) program to reduce the risks inherent in the industrial process of apparel manufacturing. Our program is intended to protect workers, especially in our key sourcing countries and countries where these dangers pose a high risk. [...]' We have also worked with expert service providers to conduct assessments of our own in other key sourcing countries, including Cambodia, Egypt, Indonesia, Jordan, Pakistan and Sri Lanka. To date, these providers have conducted FB+ES assessments and created improvement plans for over 74 of the top strategic facilities that manufacture our product. [Website- Fire, Building and Electrical Safety , N/A: gapinc.com] • Not Met: Assessment of scope of H&S issues in supply chain • Met: Analysis of trends demonstrating progress: The Gap Inc. COVC findings report reveals the percentage of factories with one or more findings related to Occupational Health Safety, including aspects such as 'health/safety laws, training, procedures, committee & meetings, ventilation, chemical safety, lighting, stairways, toilets, eating and drinking, first aid, machinery, PPE, fire alarms/extinguisher, exits, doors, electrical/mechanical safety, hot spots, etc.' The figures for each year are as follows: 92% in 2020, 46% in 2021, and 82% in 2022. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net]
D.2.8.b	Women's rights (in the supply chain)	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"> • Met: Requirements on women's rights in contracts/codes with suppliers: The Company in its Code of Vendor Conduct states 'The facility shall hire, promote, pay wages and benefits, terminate, and provide access to trainings, without regard to [...] gender, [...]. The facility shall ensure that hiring, promotion, and other human resource decisions shall be made on the workers' qualifications, skills, ability, productivity, and overall job performance. [...] Workers with the same qualifications, skills, experience, and performance shall receive equal pay for equal work in accordance with applicable labor laws. [...] The facility shall ensure that the use of medical examinations, such as pregnancy or HIV/AIDS tests, to prevent a worker from being hired is prohibited. Medical tests, if required by law, shall comply with requirements and shall not be used in any discriminatory manner. [...]' The facility shall ensure that pregnancy shall not be used as a basis for discriminatory practices like termination/demotion/pay cuts etc.' Regarding Pregnant and Breastfeeding Women its COVC states 'The facility shall take all required measures to ensure the health and safety of groups of workers with special requirements'. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] • Met: Describes work with suppliers on women's rights: The Company in its 2021 ESG Report declares 'Our Gap Inc. Personal Advancement & Career Enhancement (P.A.C.E.) program partners with vendor facilities to give women foundational life skills, technical training, and support to advance at work and in their lives.' Additionally, on its Capability Building Programs Website states 'Digital wage payment systems—including mobile wallets, bank accounts, debit cards and other digitally accessible methods—improve supply chain transparency and efficiency and support financial inclusion, giving workers, particularly women, greater control over their finances through safe options to save, spend and invest their money. 'Additionally, the Company in its Discrimination and Harassment website declares 'We know that enforcing our discrimination standards requires significant time and attention, especially because the majority of garment workers are women, while the vast majority of supervisors and managers are men. Our team also identifies common risks and best practices for pregnant or nursing women, including rearranging working hours, adjusting overtime hours and offering greater flexibility for break times.' [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] & [Website-Discrimination and Harassment, N/A: gapinc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain: The Company assesses violations under the COVC standards, covering various aspects related to discrimination during hiring, compensation, access to training, promotion, termination, or retirement based on factors such as race, colour, gender, nationality, religion, age, maternity, marital status, indigenous status, ethnicity, social origin, disability, sexual orientation, HIV/AIDS status, and membership in workers' organizations, including unions or political affiliation. Additionally, the Company stated that it evaluates general safe working conditions for all workers, including women. However, the sub-indicator aims to find evidence that the Company is aware of the number of individuals specifically affected by unsafe working conditions or discrimination against women. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net] Not Met: Analysis of trends demonstrating progress: Gap Inc. COVC Findings (2020-2022) discloses the percentage of its Company's factories that violate the requirements related to the engagement of the facilities in or support 'discrimination during hiring, compensation, access to training, promotion, termination or retirement based on race/color/gender/nationality/ religion/age/ maternity/ marital status [...]status/membership in workers organizations including unions or political affiliation'. In 2020 the percentage was 4%, 1% in 2021 and 3% in 2022. However, the sub-indicator aims to find evidence related to cases involving women only. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net]
D.2.9.b	Working hours (in the supply chain)	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: Requirements on working hours in codes/contracts with suppliers: The Code of Vendor conduct states that 'the facility shall comply with 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 ensure that over time hours not exceed the legal limits or 12 hours in a week, whichever is lesser'. It also states that 'Hourly wage rates for overtime must be higher than the rates for the regular work shift'. The Company in its Working Hours website states (1) 'Workers must be allowed to refuse overtime without any threat or penalty of punishment' (2) 'Workers must not be required to work more than six days in a row' and (3) 'Facilities must take corrective actions to limit excessive overtime, which can include analyzing the root causes of issues, adjusting production schedules and improving management systems.' However, it also states 'Based on each country's laws, we set the total number of allowable working hours per week, including overtime. Our facility ratings system identifies and implements consequences for serious overtime violations'. In order to meet this subindicator the Company shall require its suppliers to respect the ILO conventions on labour standards on working hours. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week. [Website- Working Hours, N/A: gapinc.com] & [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] Not Met: Describes work with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment of scope of excessive working hours in supply chain: The Company discloses sub-standards assessed and percentage of factories with one or more findings. One of the aspects is the following: 'working hours exceed national law or regular 48-hour workweek; Overtime is not voluntary, or retaliation is found; Timekeeping or voluntary hours system has violations; Facility does not provide 1 day off in 7; Facility does not provide mandated rest periods'. In 2022, 49% of factories (scope) violated any one of these COVC topics. However, the sub-indicator seeks evidence that the Company is aware of the number of individuals affected by these practices. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net] Met: Analysis of trends demonstrating progress: Gap Inc. COVC Findings (2020-2022) discloses the percentage of its Company's factories that violate the requirements related to Working hours. In 2020, 53% of the factories 'exceed national law or regular 48-hour workweek/Overtime is not voluntary, or retaliation is found/ Timekeeping or voluntary hours system has violations/Facility does not provide 1 day off in 7/ Facility does not provide mandated rest periods'. In 2021 the percentage was 26%, and 49% in 2022. [Gap Inc. COVC Findings (2020-2022), 2023: gapinc-prod.azureedge.net]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Forced Labour; Discrimination • Headline: Gap among the companies accused of using forced labour of Uyghurs in China • Story: On March 1st., 2020, the Australian Strategic Policy Institute (ASPI) released a report that named Gap among 83 other companies benefiting from the use of potentially abuse labour transfer programs. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country. The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers. ASPI used open-source public documents, satellite imagery, and media reports and identified 27 factories in nine Chinese provinces that have used labourers. According to the ASPI's research, the companies named in the report are directly or indirectly benefiting from the use of Uyghur workers outside Xinjiang through potentially abusive labour transfer programs as recently as 2019. ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". Gap was found to be linked to a supplier that is operating a factory in Xinjiang. <p>On April 11, 2022, press sources reported that a Canadian coalition of human-rights groups filed a complaint with the Canadian Ombudsperson for Responsible Enterprise (CORE), over allegations that some products sold by 14 companies are made in whole or in part with forced labour in China. According to the Globe and Mail, the companies named in the complaint are Costco, Gap, Hugo Boss, Nike, Ralph Lauren, Zara, Diesel, Guess? Corporation, Levi Strauss & Co., Walmart, Lululemon, Amazon, Dynasty Gold and GobiMin. The coalition's complaint, that included 28 advocacy groups such as the Uyghur Rights Advocacy Project, the Canadian Council of Imams and the Toronto Association for Democracy in China, relied on evidence from a 2020 study by the Australian Strategic Policy Institute (ASPI), which identified 27 factories in nine Chinese provinces that use Uyghur forced labour. In addition to the ASPI report, the coalition conducted its own research by reviewing shipments bills into Canada, and raised concerns in its complaint about companies' reliance on Chinese cotton, which allegedly meant that "forced labour is present in companies' supply chains even if they monitor their own factories for human rights standards", added press sources. [Australian Strategic Policy Institute. 01/03/2020, "Uyghurs for sale": ad-aspi.s3.ap-southeast-2.amazonaws.com] [Canada StockWatch, 11/04/2022, "GMN Globe says forced labour alleged at Lululemon, others": stockwatch.com] [The Globe and Mail, 11/04/2022, "Canadian watchdog asked to probe allegations that imports made with forced labour in China": theglobeandmail.com]</p>
E(1).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: In March 2020, Gap Inc. responded to the allegations that its operations have been linked to forced labour in Xinjiang. [Gap inc. Statement on Xinjiang, N/A: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: In its March 2020 statement Gap Inc. stated that it does not source any garments from the region of Xinjiang. The company added that it has taken steps to better understand its global supply chain in order to advance its commitment to respecting human rights. Gap Inc. stated that it has "strict policies against the use of involuntary labor of any kind in our supply chain... Such conduct not only violates our Code of Vendor Conduct and Human Rights Policy, but also stands against our fundamental beliefs as a company." [Gap inc. Statement on Xinjiang, N/A: gapinc.com]
E(1).2	The company has investigated	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: Engaged with stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
	and taken appropriate action		<ul style="list-style-type: none"> • Not Met: Identified cause Score 2 • Not Met: Identified and implemented improvements: Gap Inc has a comprehensive set of policies and initiatives related to ESG, including those specifically made for its supply chain partners. One of the steps the company has taken to improve its purchasing practices is by joining Better Buying, an initiative that allows them to understand the impact of its purchasing decisions and practices. The company also requires all its suppliers to adhere to its Code of Vendor Conduct. Their compliance to this requirement as well as other programs which ensure their responsible operations are what Gap Inc uses to make their purchasing decisions. However, it is not clear whether these steps have been taken in response to the allegation. [Purchasing Practices, 2023: gapinc.com] & [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: Although Gap Inc has confirmed through its statement that it does not source any of its materials from Xinjiang, the company does not provide information in the form of a formal investigation or due diligence process which validates their statement. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Discrimination • Headline: Gap among other brands called on to sign an agreement to end gender-based violence in the supply chain • Story: On February 11, 2021, Ecotextile News reported that more than 90 organisations from around the world, including worker unions and women's empowerment groups, have joined India's Tamil Nadu Textile and Common Labour Union (TTCU) as it called on garment brands to sign a binding agreement to end gender-based violence, after TTCU member was allegedly raped and murdered by her supervisor at H&M's supplier Natchi Apparels site, owned by Eastman Exports Global, which reportedly also supplies PVH Corp, and Gap. <p>On February 1, the Global Labor Justice reported that Eastman Exports Global had sent a mob of 50 men to threaten and coerce the family of a garment worker who was allegedly murdered by her supervisor in January after facing sexual harassment in the factory where she worked. The employee was found dead on January 5, after being reported missing on January 1. According to co-workers, several other women workers have also come forward to say that the supervisor has a record of sexually harassing women in the factory.</p> <p>According to police reports, the supervisor has reportedly confessed and been charged with her abduction and murder. [Global Labor Justice, 01/02/2021, "Women's Union Demands Binding Agreement from H&M After Supplier Sends Mob and Threatens Family of Murdered Garment Worker in India" : globallaborjustice.org] [The Guardian, 01/02/2021, "Worker at H&M supply factory was killed after months of harassment, claims family" : theguardian.com] [Just In Style, 05/02/2021, "H&M Responds to Gender-Based Violence at a Facility That Makes Its Clothing" : instyle.com] [Ecotextile, 11/02/2021, "Brands urged to combat gender-based violence": Brands urged to combat gender-based violence Fashion & Retail News Ne</p>
E(2).1	The Company has responded publicly to the allegation	2	<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: According to the company: 'In 2022, Gap Inc. signed a three-year agreement with Tamil Nadu Textile and Common Workers Union (TTCU), Asia Floor Wage Alliance (AFWA), Global Labor Justice-International Labor Rights Forum (GLJ-IRLF) along with other global apparel brands, to jointly develop a new program to help prevent and remediate gender-based violence and harassment (GBVH) at Natchi Apparel, a factory and spinning mill operated by Eastman Exports in India. The effort builds on Gap Inc.'s financial support for GBVH prevention programs in its supply chain and its commitments to use the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>company's industry partnerships and commercial leverage to incentivize good faith performance. (...) The agreement is one element of Gap Inc.'s broader strategy to empower and respect the rights of workers in its supply chain and honors the loss of a garment worker, Jeyasre Kathrivel, who was a member of TTCU and an employee at Natchi Apparel. Gap Inc. has never sourced products from Natchi Apparel but has relationships with other factories operated by its parent company, Eastman Exports. Gap Inc. has experience collaborating with suppliers through our Gender-Based Violence Prevention and Response program to build awareness (...) [2022 ESG Report, 2023: gapinc-prod.azureedge.net]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: See above.
E(2).2	The company has investigated and taken appropriate action	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: Engaged with stakeholders: The Company states that 'In 2022, Gap Inc. signed a three-year agreement with Tamil Nadu Textile and Common Workers Union (TTCU), Asia Floor Wage Alliance (AFWA), Global Labor Justice-International Labor Rights Forum (GLJ-IRLF) along with other global apparel brands, to jointly develop a new program to help prevent and remediate gender-based violence and harassment (GBVH) at Natchi Apparel, a factory and spinning mill operated by Eastman Exports in India.' Reaching the agreement can be considered engagement with the worker representatives. [Justice for Jeyasre, 1 April 2022, "Landmark Dindigul Agreement to Eliminate Gender-Based Violence and Harassment at Eastman Exports Natchi Apparels with the Support of Global Allies": justiceforjeyasre.com] [2022 ESG Report, 2023: gapinc-prod.azureedge.net] • Met: Identified cause: The Company states that 'The organizations participating in this agreement will provide regular GBVH training for the workforce and establish a new grievance process where issues are investigated by independent experts. Workers will serve as trained peer educators and shop floor monitors trained to detect and report incidents of GBVH.' This is seen as indication that a lack of GBVH training and independent grievance processes were the causes of the events. [2022 ESG Report, 2023: gapinc-prod.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: Gap has reportedly faced several allegations of gender based violence in its supply chain in India since 2018. The Company also has in place comprehensive policies, including a human rights policy and code of vendor conduct implemented throughout its operations. However, it is not clear if these were implemented in response to the alleged rights violations. Additionally, in April 2022 the company signed the above mentioned Agreement to End Gender-Based Violence and Harassment alongside other fashion brands. Under this agreement, which was worked in coordination with TTCU, the signatories are required "to support and enforce the TTCU-Eastman Exports agreement[...] If Eastman Exports violates its commitments, brand signatories are obligated to impose business consequences on Eastman Exports until Eastman comes into compliance." The agreement furthermore sets out a program for 'the organizations participating in this agreement will provide regular GBVH training for the workforce and establish a new grievance process where issues are investigated by independent experts. Workers will serve as trained peer educators and shop floor monitors trained to detect and report incidents of GBVH. The program is expected to reach 5,000 workers in spinning mills and sewing facilities in the first year.' ["Landmark Dindigul Agreement to Eliminate Gender-Based Violence and Harassment at Eastman Exports Natchi Apparels with the Support of Global Allies" - Justice for Jeyasre - 1 April 2022: justiceforjeyasre.com] [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] & [2022 ESG Report, 2023: gapinc-prod.azureedge.net] • Met: Stakeholder input to steps taken: The agreement was developed with representatives from several worker unions. [2022 ESG Report, 2023: gapinc-prod.azureedge.net]
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: Although Gap signed on to the Dindigul Agreement in 2021, there has been fragmentary information on whether the company or Eastman Exports Global provided direct remedy or renumeration/indemnification for the physical and mental harm experience by its supply chain workers in the past. • Not Met: Evidence for lack of Impact or link

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: As of April 2023, there has been no recent similar allegations of gender based violence in Natchi Apparels. This absence of allegations is further supported by withdrawal of the US CBP's Withhold Release Order. [Business & Human Rights Resource Centre, 21 October 2022: business-humanrights.org] • Met: Remedy delivered: In September 2022, the US Customers and Border Protection (CBP) withdrew the issuance of a Withhold Release Order against Natchi Apparels after the supplier "showed strong evidence of the absence of and remediation around all five indicators of forced labor as identified by the International Labour Organization (ILO)." [Business & Human Rights Resource Centre, 21 October 2022, "India: US government withdraws import ban on Natchi Apparels following evidence of remediation around and absence of forced labour, incl. binding agreement on gender-based violence & harassment": business-humanrights.org] • Not Met: Independent remedy process used
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: FoA/CB • Headline: GAP among others accused of anti-union practices in its Indonesian supply chain • Story: On July 11, 2022, press sources reported that that anti-union practices were taking place at PT Tainan Enterprises Indonesia, reported to supply brands including Ann Taylor, Gap and Macy's. <p>According to global trade union IndustriAll, when union affiliate Garteks formed a union at the Company's factory in North Jakarta, union president Ahmad Faisal, vice president Tulam and vice secretary Hendra Radista were allegedly dismissed on the pretext of refusing to transfer to a different factory.</p> <p>IndustriAll claimed that Tainan Enterprises Indonesia allegedly concealed the recommendation given by the Indonesian Ministry of Manpower on 24 December 2021 that the three Garteks union leaders should be reinstated: "We urge the company stop deceiving Garteks' members and stop violating national law in place to protect workers from anti-union discrimination. Tainan Enterprises Indonesia should adhere to the Ministry of Manpower's recommendation and reinstate all Garteks members with back pay and seniority", the union added.</p> <p>According to Garteks general secretary, the three dismissed union members have signed a settlement agreement with the company in February 2022, accepting severance pay on the condition that the company stop union busting. However, the union reported that management has continued to persecute union members, claiming "unethical behaviour and that all unionists must be reinstated". [Business Human Rights and Resource Centre, 22/08/2022, "Indonesia: Garment factory supplying brands incl. Ann Taylor, Gap & Macy's accused of 'union-busting' & called on to reinstate dismissed leaders; incl. co. responses": business-humanrights.org] [IndustriAll, 11/07/2022, "Union busting at Tainan Enterprises Indonesia": industrialunion.org]</p>
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: In August 2022, Gap responded to the Business and Human Rights Resource Centre's (BHRRC) questions about the allegations of anti-union practices in its supply chain in Indonesia. ["Gap's response", 22 August 2022, 22/08/2022: media.business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: In August 2022, Gap responded to the Business and Human Rights Resource Centre's (BHRRC) questions about the allegations of anti-union practices in its supply chain in Indonesia. The company stated, "We have explicitly reiterated Gap Inc.'s Code of Vendor Conduct standards related to freedom of association and non-interference, compliance with which is a condition of doing business with Gap Inc. We have also encouraged PT Tainan to establish a positive, constructive relationship with all relevant unions, including Garteks, which includes ensuring that Garteks is invited to join worker management bi-partite committee meetings to drive improvements in social dialogue." ["Gap's response", 22 August 2022, 22/08/2022: media.business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).2	The company has investigated and 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: Engaged with stakeholders: Although Gap mentioned in its statement to the BHRRC that it has engaged the executive team of Tainan Enterprises, the company did not indicate if it directly spoke to any of the union leaders or members. At the end of its statement, Gap mentions that it "will engage all relevant stakeholders until [the issues] is resolved." As of 25 April 2023, there has been no update on whether Gap has carried out this engagement plan with stakeholders. ["Gap's response", 22 August 2022, 22/08/2022: media.business-humanrights.org] • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: Gap indicates that it has 'reiterated Gap Inc.'s Code of Vendor Conduct standards related to freedom of association and non-interference, compliance with which is a condition of doing business with Gap Inc. We have also encouraged PT Tainan to establish a positive, constructive relationship with all relevant unions, including Garteks, which includes ensuring that Garteks is invited to join worker management bi-partite committee meetings to drive improvements in social dialogue.' ["Gap's response", 22 August 2022, 22/08/2022: media.business-humanrights.org] • Not Met: Stakeholder input to steps taken
E(3).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Working hours; Discrimination; Child Labour; Forced Labour • Headline: NGOs accused GAP and others of alleged labour abuses in India • Story: On May 28, 2021, a new report by NGOs Somo and Arisa found evidence across Tamil Nadu region in India of multiple labour abuses including intimidation, threats towards vulnerable female workers, abusive working and living conditions and excessive overtime. <p>The report named international brands including Gap, Tesco, Next, Sainsbury's, and Carrefour SA, in which it claimed the companies were directly or indirectly linked to the mills investigated.</p> <p>A worker at one of the mills interviewed by the NGO claimed lack of sleep and excessive work where workers allegedly have to work two or three shifts. Workers also claimed severe limitations on their freedom, saying that while they were not working they had to remain in dormitories and were closely monitored. Others female workers reported feeling unsafe and being subject to sexual harassment from their male managers and supervisors.</p> <p>[The Guardian, 28/05/2021, "Tesco and Next among brands linked to labour abuses in India spinning mills": theguardian.com] [SOMO, 27/05/2021, "International companies linked to forced labour in Indian spinning mills": somo.nl]</p>
E(4).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: Gap responded to media inquiries, denying that it had any link to the mills investigated by SOMO. [The Guardian, 28/05/2021: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: Gap reportedly denied that its supply chain had any link to the cotton mills identified in the Somo report. The company was cited by media stating, "[w]e recognise that the urgent labour and human rights issues in Tamil Nadu's fabric manufacturing sector are systemic, and we will continue to work with industry peers and expert organisations in addressing them." [The Guardian, 28/05/2021: theguardian.com]
E(4).2	The company has investigated and taken	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: Engaged with stakeholders • Not Met: Identified cause

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: Gap has in place comprehensive policies, including a human rights policy and code of vendor conduct implemented throughout its operations. However, it is not clear whether those have been implemented in response to the alleged rights violations. [Code of Vendor Conduct, N/A: gapinc-prod.azureedge.net] & [Human Rights Policy, 06/2020: gapincsustainability.com] • Not Met: Stakeholder input to steps taken
E(4).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: Covid-19 outbreak at factories supplying major global garment brands reveal lack of adequate safety measures for workers • Story: A garment factory supplying Gap, American Eagle and Amazon was at the centre of one of the worst Covid-19 outbreaks in Guatemala, as the Guardian reports. <p>More than 200 people tested positive for Covid-19 at the KP Textil factory, exposing the dire working conditions. Human rights activists said that KP Textil, on the outskirts of Guatemala City, lacked adequate health and safety measures to prevent an outbreak. The factory denied full entry to inspectors from the health ministry and the Guatemalan Social Security Institute (IGGS) on the grounds that the premises were private property and that testing would interfere with production.</p> <p>When all 900 workers were tested, 201 positive cases were reported. The virus outbreak went on to cause the death of at least one KP Textil garment worker. [The Guardian, 06/08/2020, "Covid outbreak exposes dire conditions at Guatemala factory making US brands": theguardian.com]</p>
E(5).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: A response y the Company was cited by The Guardian. [The Guardian, 06/08/2020: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: Gap was cited by The Guardian, stating that it based its COVID-19 advice "on information from public health and work safety experts ... [it was] in close contact with labour rights organisations, including Maquila Solidarity Network, as part of our effort to ensure that KP Textil most effectively mitigates the impacts of Covid-19 on their workers". [The Guardian, 06/08/2020: theguardian.com]
E(5).2	The company has investigated and 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: Engaged with stakeholders: The Company indicates it engaged with experts and labour rights organisations. However, it is not clear whether those were legitimate representatives of the affected stakeholders. [The Guardian, 06/08/2020: theguardian.com] • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: In addition to engaging with its supplier and labour rights organisations on ways to improve the COVID-19 safety measures in its supplier's factories, Gap has also formed a COVID-19 Task Force to support its supply chain partners. Its Task Force has also pushed for wider distribution of vaccines into underserved markets and has integrated vaccine education into its PACE Program. [ESG Report 2021, 2022: gapinc-prod.azureedge.net] • Not Met: Stakeholder input to steps taken
E(5).3	The company has engaged with affected stakeholders to	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: Provided remedy: The company stated that it was working closely with KP Textil on its COVID-19 safety measures and has been in close contact with labour

Indicator Code	Indicator name	Score (out of 2)	Explanation
	provide for or cooperate in remedy(ies)		<p>rights organisations to help mitigate the impact of the pandemic to workers in its supply chain. [The Guardian, 06/08/2020: theguardian.com]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: The mayor of city where the factory operates stated that KP Textil was "putting things in order", after it had shutdown the factory due to the COVID-19 outbreak. [The Guardian, 06/08/2020: theguardian.com] • Not Met: Remedy delivered • Not Met: Independent remedy process used

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