

# GAP INC. FACTORY CONFLICT MINERALS POLICY



BANANA REPUBLIC

OLD NAVY

ATHLETA

INTERMIX

Gap Inc.

## **GAP INC. IS COMMITTED TO ENSURING FULL COMPLIANCE WITH SECTION 1502 OF THE UNITED STATES DODD-FRANK ACT RELATING TO TRADE IN CONFLICT MINERALS.**

The conflict minerals law is intended to address the situation in the mining industry in parts of the Democratic Republic of Congo (DRC) and neighboring countries in Africa, where armed groups controlling local mines are using mining proceeds to fund regional conflicts. The law requires publicly traded companies to report to the U.S. Securities and Exchange Commission (SEC) and disclose on their website whether the defined conflict minerals – cassiterite (tin), columbite-tantalite (tantalum), gold, and wolframite (tungsten) – are necessary to the functionality or production of products they manufacture or contract to manufacture and, if so, whether those conflict minerals originate from conflict mines in the DRC or neighboring countries.

Gap Inc. has long been focused on sourcing product in a socially and environmentally responsible manner and we are committed to working with vendors that share our commitment to sourcing responsibly. To that end, Gap Inc. expects all vendors manufacturing our products to cooperate with Gap Inc.'s conflict minerals due diligence process.

Gap Inc. further expects all vendors manufacturing our products to seek to purchase materials from suppliers not involved in funding conflict in the DRC region. Gap Inc. will follow the Organization for Economic Cooperation and Development (OECD) framework to incorporate proper due diligence measures into our supply chain regarding trade in conflict minerals. Given the complexity of our supply chain, we recognize we can successfully put this framework in place only with the full cooperation of our vendors. Accordingly, we are working closely with our vendors to determine the potential use of conflict minerals in our supply chain and conveying our expectation that they source such materials from socially responsible suppliers and smelters.

Gap Inc. takes its responsibilities under the conflict minerals law very seriously and is working diligently to ensure full compliance.