

GAP INC.

HUMAN RIGHTS POLICY

Updated June 2020



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Gap Inc.

GAP INC. HUMAN RIGHTS POLICY

Since Gap Inc.'s founding in 1969, a commitment to respect the dignity of all people and communities has guided our company. We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We expect our business partners, including suppliers, to adopt and adhere to similar values.

Through proactive due diligence aligned with the UN Guiding Principles on Business and Human Rights we seek to avoid adverse human rights impacts and complicity in the adverse impacts caused by others. We are committed to providing access to effective remedy in the event that we cause or contribute to an adverse impact. This commitment extends to collaborating with others to find solutions and not obstructing access to other remedies that reduce human rights impacts. Our ongoing work is to embed human rights considerations in all relevant business decisions. This commitment applies globally to our own operations, our products and services, and our business relationships, including our supply chain. In addition, Gap Inc. will continue to look for ways to promote and advance human rights within its sphere of influence.

KEY AREAS OF IMPACT

We regularly conduct corporate-wide human rights assessments, informed by internal and external experts, to determine our most salient human rights issues. We have identified three priority areas of impact:

WORKING CONDITIONS IN OUR SUPPLY CHAIN

We have a responsibility to respect the human rights of the people who make our clothes. Through our Supplier Sustainability program, we seek to ensure that they work in safe, healthy, and fair conditions and that they are treated with dignity and respect. We implement our human



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rights commitment through our [Code of Vendor Conduct](#) and enforce it through our assessment, remediation, capability building, and worker engagement programs at supplier facilities. Through these programs, we consult directly with workers to better understand and address their concerns and priorities.

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. To help address the most complex and pressing human rights challenges we also partner with our peers in collaborative initiatives such as ILO's Better Work Program, the Sustainable Apparel Coalition, the Zero Discharge of Hazardous Chemicals Initiative, and the UN Global Compact.

THE RIGHTS OF OUR EMPLOYEES

Our goal is to embed human rights in all aspects of our business. All of our employees around the world deserve to be treated with dignity and respect, and we all have a responsibility, individually and collectively as Gap Inc. employees, to bring this policy and our commitments to life. We implement our commitments through our [Code of Business Conduct \(COBC\)](#) which includes provisions on salient human rights issues such as on non-discrimination and harassment. All employees are required to complete the Principles of Integrity: Code of Business Conduct Overview training course to ensure their understanding of our commitments.

As a globally operating company co-founded by a woman, Doris Fisher, we understand that a diverse and inclusive workplace is critical to our success. Further, we are committed to equal pay for equal work. Our Equality and Belonging Council guides our strategy and our [Equality and Belonging Network Groups](#) help us to foster an inclusive culture in which every employee, customer, and job candidate is treated with respect.

WOMEN'S EMPOWERMENT

We believe that women's empowerment is essential to advancing human rights protections globally and to achieve the United Nations Sustainable Development Goals. With women representing a large majority of our employees, the workers who make our clothes, and our customers, we have a responsibility and an opportunity to empower the women whose lives we touch. To underscore our commitment, we have signed the Women's Empowerment Principles and are implementing them throughout our operations and supply chain. Through our [P.A.C.E.](#) (Personal Advancement & Career Enhancement) program, we work to provide women with the opportunity to gain skills and confidence to advance both at work and in life.

GOVERNANCE

While human rights are the responsibility of all of us at Gap Inc., 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 implementation of this policy at the board level. The Committee meets at least four times per year to



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review and evaluate company programs, policies and practices relating to social and environmental issues and impacts to support the sustainable growth of the company's businesses.

IMPLEMENTATION

As a global company, we may from time to time be faced with situations where local laws conflict with international human rights standards. Should such circumstances arise, Gap Inc. will comply with all applicable laws while seeking solutions that are in the spirit of respect for human rights and of this policy.

We are committed to conducting ongoing human rights due diligence and to engage with our key stakeholders around the world to continue to improve our approach. We will develop and implement training on this policy for key Gap Inc. employees and business partners, and report on our progress in our Global Sustainability Report.

[Gap Inc's COBC hotline](#) is made available for employees to raise concerns about potential violations of our Code of Business Conduct. Any concerns are addressed using a robust internal process, and we regularly update our policies and practices based on our findings. At the factory level, we support worker committees where grievances can be expressed, and we check that they are present through our Supplier Sustainability assessment program.

Sonia Syngal
Chief Executive Officer



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