

GAP
INC.

2024 Impact Report



About This Report

This report covers Gap Inc.’s global operations for fiscal 2024. All previous years’ reports are available on our website. This report highlights progress on our priority focus areas and related goals for the 2024 fiscal year. It provides detailed information on program objectives, operations, and our management approach.

The report is prepared in reference to the Global Reporting Initiative (GRI) Standards and aligns with the Sustainable Accounting Standards Board (SASB) Standards and the Task Force on Climate-related Financial Disclosures (TCFD). Gap Inc. is committed to the United Nations Global Compact (UNGC) Ten Principles, and this report serves as our Communication on Progress. Gap Inc. identifies Sustainable Development Goals (SDGs) 5, 6, 8, 10, 12, and 13 as most relevant to our business, and SDGs 7 and 17 as interconnected to our approach.

Our Greenhouse gas emissions data received [independent limited assurance](#). All other metrics are subject to an internal quality review.

For questions regarding Gap Inc.’s sustainability efforts or the content of this report, please contact sustainability@gap.com.

CAUTIONARY NOTE

The inclusion of information contained in this report is being made in good faith based on information that is available to Gap Inc. as of

February 1, 2025, (unless otherwise specified). Given the inherent uncertainty in predicting and modeling future conditions, caution should be exercised when interpreting the information provided in this report. In addition, the controls, processes, practices, and infrastructures described in this report are not intended to constitute any representation, warranty, or other assurance that such controls, processes, practices, and infrastructures will result in any specific outcome, result, or achievement of a stated target or goal.

For clarity, the identification of our material topics related to environmental, social, and governance, the identification of SDGs as relevant, supporting, or interconnected to our business, or our identification of any material topics, impacts, risks, strategies, or opportunities in response to the GRI, SASB, or TCFD reporting frameworks on the following pages should not be construed as a characterization regarding the materiality or financial impact of any such topics, impacts, risks, strategies, or opportunities or related information to investors in Gap Inc. For a discussion of the risks that are material to investors in Gap Inc., please see our Annual Report on Form 10-K for the year ended February 1, 2025, and our other filings with the U.S. Securities and Exchange Commission.

This report may also include “forward-looking statements” within the meaning of U.S. federal securities laws. Forward-looking statements are any statements other than statements of

historical fact. Forward-looking statements represent our current judgment about possible future events and are often identified by words such as “anticipate,” “appears,” “approximately,” “believe,” “continue,” “could,” “designed,” “effect,” “estimate,” “evaluate,” “expect,” “forecast,” “goal,” “initiative,” “intend,” “may,” “objective,” “outlook,” “plan,” “potential,” “priorities,” “project,” “pursue,” “seek,” “should,” “target,” “when,” “will,” “would,” or the negative of any of those words or similar expressions. In making these statements, we rely upon assumptions and analysis based on our experience and perception of historical trends, current conditions, and expected future developments, as well as other factors we consider appropriate under the circumstances.

We believe these judgments are reasonable, but these statements are not guarantees of any future events or financial results, and our actual results may differ materially due to a variety of factors, many of which are described in our Annual Report on Form 10-K for the year ended February 1, 2025, and our other filings with the U.S. Securities and Exchange Commission. We caution readers not to place undue reliance on forward-looking statements. Forward-looking statements speak only as of the date they are made, and we undertake no obligation to update publicly or otherwise revise any forward-looking statements, whether as a result of new information, future events, or other factors that affect the subject of these statements, except where we are expressly required to do so by law.



ABOUT GAP INC.

The Gap, Inc. (Gap Inc., the “company,” “we,” and “our”) is a house of iconic brands offering apparel, accessories, and personal care products for men, women, and children under the Old Navy, Gap, Banana Republic, and Athleta brands.

Gap Inc. is an omni-channel retailer, with sales to customers both in stores and online, through company-operated and franchise stores, websites, and third-party arrangements. As of February 1, 2025, we had company-operated stores in the United States, Canada, Japan, and Taiwan. In fiscal 2022, we signed agreements with a third party, Baozun Inc. (Baozun), to operate Gap China and Gap Taiwan (Gap Greater China) stores and the in-market website as a franchise partner. On January 31, 2023, the Gap China transaction closed with Baozun. Gap Taiwan operations will continue to operate as usual until regulatory approvals and closing conditions are met.

We have franchise agreements to operate Old Navy, Gap, Banana Republic, and Athleta throughout Asia, Europe, Latin America, the Middle East, and Africa. Under these agreements, third parties operate, or will operate, stores and websites that sell apparel and related products under our brand names. We also have licensing agreements with licensees to sell products using our brand names.

In addition to operating in the specialty, outlet, online, and franchise channels, we use our omni-channel capabilities to bridge the digital world and physical stores. The shopping experience is further enhanced by our omni-channel services, including buy online pick-up in store, order-in-store, and ship-from-store, as well as enhanced mobile-enabled experiences, which allow our customers to shop seamlessly across our brands and channels. Our brands have shared investments in supply chain and inventory management, which allows us to optimize efficiency and responsiveness in our operations.

Learn more: [Annual Filings](#)

Contents

1	The Big Picture	36	Governance
2	About This Report	37	Supplier Compliance
4	Our Commitment: CEO Message	39	Management Oversight
5	Who We Are	40	Risk Management
6	Our House of Brands	41	Stakeholder and Political Engagement
7	Our Impact Approach	42	Business Ethics and Integrity
8	Our Impact Through the Years		
9	2024 Highlights	43	Appendix
10	Gap Inc. Goals and Progress		
12	Environment	44	Materiality Assessment
		45	Global Reporting Initiative (GRI) Index
		50	Sustainability Accounting Standards Board (SASB) Index
13	Bridging the Climate Gap	55	Task Force on Climate-Related Financial Disclosures (TCFD) Index
16	Water Stewardship	56	Supplemental Data
18	Product	57	Data Assurance
20	Circularity and Waste		
21	Social		
22	Human Rights		
24	Bridging the Equity Gap		
27	Bridging the Opportunity Gap		
30	Bridging the Inclusion Gap		
31	Inclusion and Belonging		
33	Human Capital Management		
35	Employee Engagement and Corporate Giving		



Our Commitment *CEO Message*

Companies that matter often ask themselves, can we matter even more?

At Gap Inc. we’re energized by a deeper question, how can mattering more increase our positive impact on people and planet?

For nearly six decades, purpose and profit have coexisted at the heart of our company. Not as a passive pairing but rather as a persistent motivation to do better by our stakeholders, from customers and employees to partners and shareholders.

It’s a proud legacy that goes back to 1969 when our founders, Doris and Don Fisher, imagined better and bridged the generation gap with jeans for all, and a store like no other that welcomed everybody.

Right from the start, Gap Inc. was made to matter, which meant we could do more than sell clothes, we could make a real difference in the world.

Today, Gap Inc. continues to lead with purpose, ever mindful of our impact on people and the planet. This strengthens our business and helps us innovate in ways that create long-term, sustainable value for customers and shareholders alike.

As a house of iconic American brands, we bridge gaps to create a better world with a focus on driving impact in four key areas:

BRIDGING THE CLIMATE GAP

We strive to build a more resilient business and protect the planet by innovating more sustainable ways to make our products and conserve natural resources for future generations. To ensure Gap Inc.’s operations and supply chain are built on healthy communities, we’re committed to reaching net zero carbon emissions by 2050, and by 2030, reducing and replenishing 100% of the water we use across our value chain.

We’ve made industry-leading investments to improve water access through the Women + Water Collaborative. We’ve also launched a 10-year water replenishment project to repair leaks in India’s pipeline infrastructure using AI-powered sound technology. In 2024, we reduced or replenished 3.9 billion liters of water in our supply chain. And since 2017, we’ve helped more than 2.6 million people access clean water – on track to reach our goal of 5 million by 2030.

BRIDGING THE EQUITY GAP

Our programs embrace a collaborative approach to upholding basic human rights, maintaining safe working conditions, and providing equal pay for equal work. Investing in our people is essential to building a sustainable business that delivers lasting value to our stakeholders.

The majority of our customers are women, as are Gap Inc.’s leadership, employees, and supply chain workers. So, we understand the value women bring to our business and we invest in programs internationally that ensure they are empowered to reach their full potential both at work and at home.

Since 2007, Gap Inc.’s P.A.C.E. and RISE initiatives have positively impacted more than 1.6 million women and girls in 85% of our strategic factories by providing life skills training.

BRIDGING THE OPPORTUNITY GAP

Gap Inc. believes that everyone should have a shot at building an extraordinary career. As one of the largest employers of entry level jobs, we strive to remove barriers and open doors for all.

Gap Inc. is committed to using the assets and scale of our business to provide opportunity for people in the communities we serve, while increasing retention and a ready pipeline of talent. Since 2007, our This Way ONward initiative has reached more than 27,000 young people, unlocking career potential one person and one job at a time.

BRIDGING THE INCLUSION GAP

As a house of brands that reaches every generation, gender, and geography in America, Gap Inc. is in a unique position to bring people into those gaps where there is common ground and shared humanity. Since our founding, we’ve committed to bridging the inclusion gap with clothes designed to make everybody look and feel good, messaging that celebrates our shared humanity, and a talented, high-performing workforce the mirrors the world. And we honor that legacy by continuing to lead inclusively and fostering a deep sense of belonging.

We’re incredibly proud of the impact we made in 2024. And this year Gap Inc. is intent to deepen our impact even more.

Thank you for your interest in our work. To stay connected, please visit us at [gapinc.com](https://www.gapinc.com).



Onward!

RICHARD DICKSON
PRESIDENT & CEO, GAP INC.

Who We Are

A house of iconic brands, Gap Inc. is the largest specialty apparel company in America. Its Old Navy, Gap, Banana Republic, and Athleta brands offer clothing, accessories, and lifestyle products for men, women, and children. Since 1969, Gap Inc. has created products and experiences that shape culture while doing right by its employees, communities, and the planet. Our brands inspire authentic self-expression – moving people, communities, and fashion forward.

Our Vision

To become a high-performing house of iconic American brands that shape culture.

Our Purpose

We bridge gaps to create a better world.

Our Values

Center on the Customer | Create with Curiosity
Collaborate with Candor | Champion Excellence

AWARDS AND RECOGNITION

Dow Jones Sustainability Index

Member for the 12th year in a row

Forbes

World’s Top Employers for Women 2024
251st overall

USA Today

America’s Climate Leaders 2024

TIME

World’s Most Sustainable Companies inaugural list
73rd overall

Newsweek

America’s Most Responsible Companies
13th in retail, 90th of 600 overall

American Opportunity Index

7th in retail

HR Asia

Best Companies to Work for in Asia, Winner Vietnam

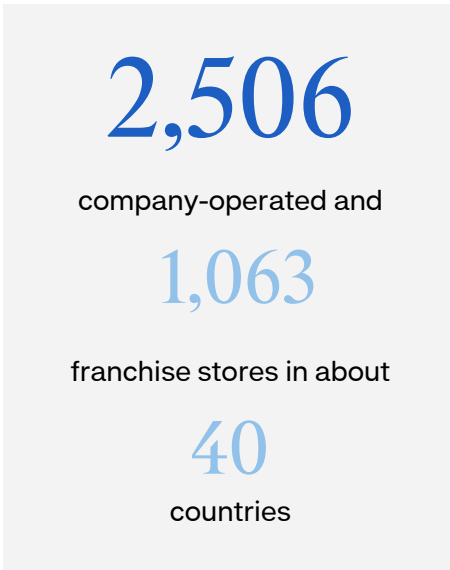
Anthem Award

Finalists, Gap Inc. and Old Navy

Fast Company’s Brands That Matter

Gap brand recognized for demonstrating a strong commitment to innovation, social impact, and cultural relevance

GAP INC. BY THE NUMBERS IN FISCAL 2024



¹ Online sales primarily include sales originating from our online channel, including those that are picked up or shipped from stores and net sales from revenue-generating strategic initiatives.

Our House of Brands

We inspire self-expression through four of the most iconic American brands – Old Navy, Gap, Banana Republic, and Athleta. Each brand is uniquely positioned to contribute to our environmental and social impact.²



1,249 stores
\$8.4B net sales

Old Navy is a North American value apparel brand that makes on-trend fashion accessible to everyone. The brand democratizes style through its combination of on-trend products, consistent quality, and affordable pricing. Old Navy is committed to creating a frictionless and delightful shopping experience across stores, online, and its convenient omni-channel capabilities. Old Navy opened its first store in 1994 in the United States and since then has expanded to more than 1,200 company-operated stores in the U.S. and Canada, as well as franchise stores around the world.



575 stores
\$3.3B net sales

Gap is a globally recognized icon of casual American style. Founded in San Francisco in 1969, Gap champions originality by creating loved essentials and delivering culturally relevant experiences that celebrate individuality. Gap is an adult apparel and accessories brand that also offers GapKids, babyGap, Gap Maternity, GapBody, and GapFit collections. The brand also serves value-conscious customers with exclusively designed collections for Gap Outlet and Gap Factory stores. Gap is our namesake brand and connects with customers in company-operated and franchise retail locations globally, online, and through licensing partnerships.



422 stores
\$1.9B net sales

Banana Republic is a storyteller's brand, outfitting the modern explorer with high-quality, expertly crafted collections and experiences to inspire and enrich their journeys. Founded in 1978 and acquired by Gap Inc. in 1983, Banana Republic connects with customers in company-operated and franchise retail locations globally and online.



260 stores
\$1.4B net sales

Athleta is a premium performance lifestyle brand that empowers women and girls to build confidence, strength, and belonging through movement – igniting the Power of She. Founded in 1998 and acquired by Gap Inc. in 2008, Athleta integrates technical features and innovative design to support all the ways she moves – from yoga and training to travel and recovery. Athleta's versatile performance apparel is designed for women by women, with inclusivity at its core. Since 2018, Athleta has been certified as a benefit corporation (B Corp), furthering its commitment to using the business as a force for good to drive social and environmental impact. Athleta apparel is available at company-operated stores across the United States and Canada, franchise retail locations globally, and online.

² Net sales are for fiscal 2024, which ended February 1, 2025. Store counts are as of February 1, 2025, and do not include franchise stores.

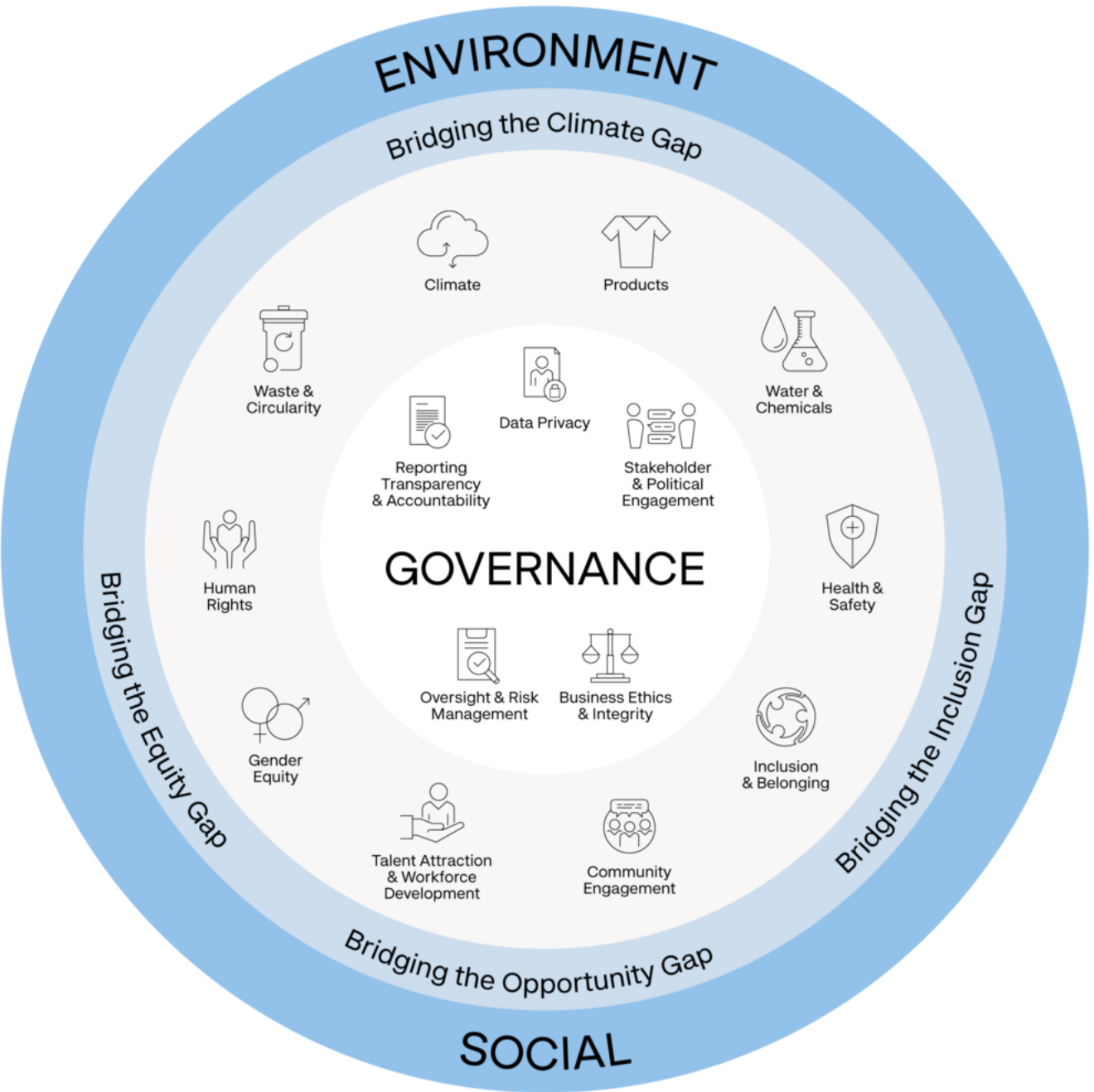
Our Impact Approach

What started as a retail concept that bridged the generation gap has inspired so much more. We believe progress can be found in the gaps where we find our common thread and our shared humanity.

Gap Inc.'s four purpose pillars – Bridging the Climate Gap, Bridging the Equity Gap, Bridging the Opportunity Gap, and Bridging the Inclusion Gap – are embedded within the broader environmental, social, and governance (ESG) framework. Our environmental and social initiatives, informed by our materiality assessment, are part of our end-to-end business strategy, through which we drive operational efficiency, enable value creation, and spur innovation.

We hold ourselves accountable for environmental and social issues in our business operations with a strong governance structure. Designated Board committees oversee relevant ESG topics and receive regular updates. We integrate these issues and manage related risks and opportunities across the business through partnerships with executives across brands and functions.

Learn more: [Governance](#), [Materiality Assessment](#)



Signatories and Memberships

We actively participate in industry collaborations and international coalitions that enable us to advance our goals. As members and signatories, we actively participate in:

- Better Cotton
- Better Than Cash Alliance
- Black In Fashion Council
- Boys & Girls Clubs of America
- Business for Social Responsibility (BSR)
- Cascale, Inc.
- The Door
- The Fashion Pact
- International Accord for Health and Safety in the Garment and Textile Industry
- International Labour Organization (ILO) and International Finance Corporation (IFC) Better Work
- Life and Building Safety (LABS) Initiative
- Nirapon
- Open to All
- Opportunity@Work
- RISE (Reimagining Industry to Support Equality)
- Social & Labor Convergence Program (SLCP)
- Tent Partnership for Refugees
- Textile Exchange
- UN Free & Equal
- UN Global Compact (UNGC)
- UN Framework Convention on Climate Change (UNFCCC) Fashion Industry Charter for Climate Action
- U.S. Cotton Trust Protocol
- Water Resilience Coalition (WRC)
- WaterEquity
- Water Mandate
- WASH4Work
- Welcome.US
- Worldly
- YWCA USA

Our Impact Through the Years

Since our start in 1969, it’s been about doing more than selling clothes.

We celebrate the progress made toward social and environmental sustainability since launching this work over three decades ago.

We recognize that there is still more work to be done and that future progress against our goals will require deepened partnerships with priority stakeholders and further integration of sustainability objectives across our business.

See additional [2024 Highlights](#) on page 9.

<div>1994</div> <div>Supplier Sustainability program (now called Vendor Compliance) established</div> <div></div>	<div>2003</div> <div>Published first Social Responsibility Report</div> <div></div>	<div>2004</div> <div>Launched Water Quality Program</div> <div>Published first GRI and UN Global Compact indices</div> <div></div>	<div>2007</div> <div>Launched This Way Ahead (now This Way ONward)</div> <div>Launched the Personal Advancement & Career Enhancement (P.A.C.E.) program</div> <div></div>	<div>2008</div> <div>Conducted our first environmental footprint assessment</div> <div></div>
<div>2010 - 2011</div> <div>Submitted first CDP Climate and Water responses</div> <div></div>	<div>2014</div> <div>Announced equal pay for equal work - the first Fortune 500 company to do so</div> <div></div>	<div>2016</div> <div>Joined the UN Global Compact CEO Water Mandate</div> <div>Launched Washwell method to reduce water use in manufacturing</div> <div></div>	<div>2017</div> <div>Signed on to the Science Based Targets initiative (SBTi)</div> <div>Launched the USAID Gap Inc. Women + Water Alliance public - private partnership</div> <div>Published first SASB index</div> <div></div>	<div>2018</div> <div>Achieved B Corp status for Athleta</div> <div></div>
<div>2020</div> <div>Achieved goal to save 10 billion liters of water in manufacturing since 2014</div> <div>Set our 2030 science-based targets for climate</div> <div>Set our 2025 goals</div> <div></div>	<div>2021</div> <div>Published first TCFD index</div> <div>Exceeded our goal to reach 1 million direct beneficiaries through P.A.C.E.</div> <div></div>	<div>2022</div> <div>Set our 2050 net-zero emissions target and 2030 goals</div> <div>Exceeded our goal to reach 2 million people with improved access to water and sanitation by 2022</div> <div></div>	<div>2023</div> <div>Launched Women + Water Collaborative with partners WaterAid, Cargill, and GSK</div> <div>Launched RISE in collaboration with BSR, HERproject™, CARE, and Better Work</div> <div></div>	<div>2024</div> <div>Surpassed our goal to engage 20,000 youths in This Way ONward since 2007</div> <div>Set our 2050 science-based target for net-zero carbon emissions across our value chain by 2050</div> <div>Celebrated 30 years since the founding of our Vendor Compliance program and Global Sustainability departments and programming</div>

2024 Highlights



Bridging the Climate Gap

98% of cotton was from more sustainable sources.³

40% of polyester was from recycled sources.

52% of electricity in direct operations was from renewable sources.

74% reduction in Scope 1 and 2⁴ emissions since 2017.



Bridging the Equity Gap

85% of strategic factories⁵ had at least 50% of women workers enroll in P.A.C.E. or RISE, reaching nearly 98,000 workers in 2024 alone.

99% of Tier 1 factories offer digital payments.

83% of business spend allocated to green-rated factories.



Bridging the Opportunity Gap

27,000+ youth reached through This Way ONward since 2007.

10,100+ jobs filled by opportunity talent across the company since 2007.



Bridging the Inclusion Gap

Invested \$290,000 in community programs to help foster more resilient and inclusive communities in partnership with trusted nonprofit organizations.

³ Defined as: Better Cotton (formerly BCI), verified U.S.-grown cotton (USCTP), organic, in conversion (to verified organic), recycled, or regenerative.

⁴ Scope 1: direct emissions; Scope 2: indirect emissions from purchased electricity use at company-operated facilities.

⁵ Strategic factories are those representing 80% of our total business spend in fiscal 2021 as a baseline for our 2025 goals (defined as: purchase order first cost).

Gap Inc. Goals and Progress

● Achieved ● On track ● Needs attention

GOAL	TARGET YEAR ⁶	STATUS	2024 PROGRESS
ENVIRONMENT			
<u>Bridging the Climate Gap^{7,8}</u>			
Reduce Scope 1 and 2 greenhouse gas (GHG) emissions by 90% from a 2017 baseline	2030	<div></div>	74% reduction from 2017 to 2024
Reduce Scope 3 GHG emissions from purchased goods and services by 32.5% from a 2017 baseline	2030	<div></div>	13% reduction from 2017 to 2024 ⁹
Source 100% renewable electricity for our company-operated facilities globally	2030	<div></div>	52% of electricity use from company-operated facilities was from renewable sources in 2024
Achieve net-zero carbon emissions across our value chain ¹⁰	2050	<div></div>	17% reduction from 2017 to 2024
<u>Water Stewardship</u>			
Empower 5 million people touched by the apparel industry to improve their equitable access to clean water and sanitation	2030	<div></div>	2.6 million people reached since 2017
Reduce water use and replenish water to nature, equivalent to 100% of the water used in manufacturing apparel and in our company-operated facilities	2030	<div></div>	14% achieved in 2024 – we reduced or replenished 3.9 billion liters of water and consumed 28 billion liters from manufacturing apparel and our company-operated facilities
Achieve net positive water impact in water-stressed regions	2050	<div></div>	Built roadmaps and began implementation of several initiatives to progress on intermediary 2030 goals
Support a water-resilient supply chain	2050	<div></div>	
<u>Product¹¹</u>			
Source 100% of cotton from more sustainable sources ¹²	2025	<div></div>	98%
Source at least 45% of polyester from recycled sources	2025	<div></div>	40%
<u>Circularity and Waste</u>			
Eliminate unnecessary or problematic plastics in packaging to consumers by 2025 and in packaging to businesses by 2030, in line with our Fashion Pact commitments ¹³	2025/2030	<div></div>	26% of unnecessary or problematic plastics in packaging to consumers has been eliminated and replaced with paper or other reusable alternatives
Ensure at least half of all plastic packaging is 100% recycled content, for packaging to consumers by 2025 and in packaging to businesses by 2030, in line with our Fashion Pact commitments	2025/2030	<div></div>	80% of all plastic packaging to consumers is made with 100% recycled content – achieving the 2025 target

⁶ All target years reference the end of fiscal year, unless otherwise stated.

⁷ Scope 1: direct emissions; Scope 2: indirect emissions from purchased electricity use at company-operated facilities; and Scope 3: indirect emissions from value chain activities such as goods production, transportation, and franchise emissions.

⁸ As part of our science-based target update in 2023, we recalculated our 2017 baseline and 2022 emissions. As a result, these updated metrics may not match our previous CDP Climate submission or align with previous reports.

⁹ Data is subject to change retrospectively each year as we gain better visibility into our respective share of emissions with each of our suppliers.

¹⁰ Scope 3.11 is not included in our SBTs and is primarily out of the control of Gap Inc.

¹¹ Gap Inc. fiber data differs from our fiscal year and is derived on a seasonal calendar from purchase order materials data for all brands, excluding BR Home products. We currently do not trace fiber consumption for franchises or VMI (vendor-managed inventory) because their data is not in our booking system. We have limited visibility into third-party licensing and accessories, but are continuously improving this connection.

¹² Defined as: Better Cotton (formerly BCI), verified U.S.-grown cotton (USCTP), organic, in conversion (to verified organic), recycled, or regenerative.

¹³ In line with our commitment to The Fashion Pact’s Ocean Pillar, we use the Ellen MacArthur Foundation’s definition of unnecessary and problematic plastic that consists of five criteria. All our B2C packaging is categorized as necessary, unnecessary, problematic, or non-problematic. Depending on the category, it is either set for elimination, diversion, or conversion.

Gap Inc. Goals and Progress

Continued

● Achieved ● On track ● Needs attention

GOAL	TARGET YEAR ¹⁴	STATUS	2024 PROGRESS
SOCIAL			
Bridging the Equity Gap			
100% of our strategic factories are investing in women’s empowerment through participation in P.A.C.E./RISE ¹⁵	2025	●	85% of strategic factories are participating in P.A.C.E. or RISE
100% of workers employed in our strategic factories will have their voices heard through representative workplace committees	2025	●	100% of strategic factories have representative workplace committees ¹⁶
100% of our strategic factories will have achieved gender parity at the supervisor level	2025	●	40% of strategic factories have achieved gender parity at the supervisor level; see Factory Programs for more information ¹⁷
100% of our factories will have prevention and response management systems and trainings in place to address gender-based violence and harassment	2025	●	98% of factories have prevention and response management systems and training in place to address gender-based violence and harassment
Bridging the Opportunity Gap			
Hire 5% of Old Navy entry-level store employees from This Way ONward annually	2025	●	7.5%
Reach 20,000 youth through This Way ONward	2025	●	27,000+ youth reached since 2007
GOVERNANCE – SUPPLIER COMPLIANCE			
100% of our in-scope Tier 1 facilities will participate in industrywide efforts by 2023, including SLCP and/or ILO-IFC Better Work, and 100% of Tier 2 strategic mills will participate by 2025 ¹⁸	2023/2025	●	100% of in-scope Tier 1 facilities are participating 82% of Tier 2 strategic mills are participating ¹⁹
80% of Gap Inc. sourcing will be allocated to green-rated factories	2025	●	83% of our business spend was allocated to green-rated factories
100% of vendors comprising 90% of Gap Inc.’s business spend are invited to participate in Better Buying, with scores isolated across brands, working toward annual public reporting on purchasing practices improvements	2025	●	100% of vendors comprising 90% of our business spend have been invited to participate in Better Buying, and we continue working toward sharing updates on purchasing practices improvements

¹⁴ All target years reference the end of fiscal year, unless otherwise stated.

¹⁵ Strategic factories are those representing 80% of our total business spend in fiscal 2021 as a baseline for our 2025 goals (defined as: purchase order first cost).

¹⁶ Defined as meeting at least 70% of relevant Better Work Academy Social Dialogue Indicators (SDIs) and meet minimum requirement indicators (SDI 9, SDI 17, and SDI 18).

¹⁷ Macroeconomic challenges have negatively impacted factory growth, resulting in reduced turnover and limited advancement opportunities for new female supervisors. While factories across geographies are training potential female supervisors, progress has been slower than anticipated. Learn more: [Factory Programs](#).

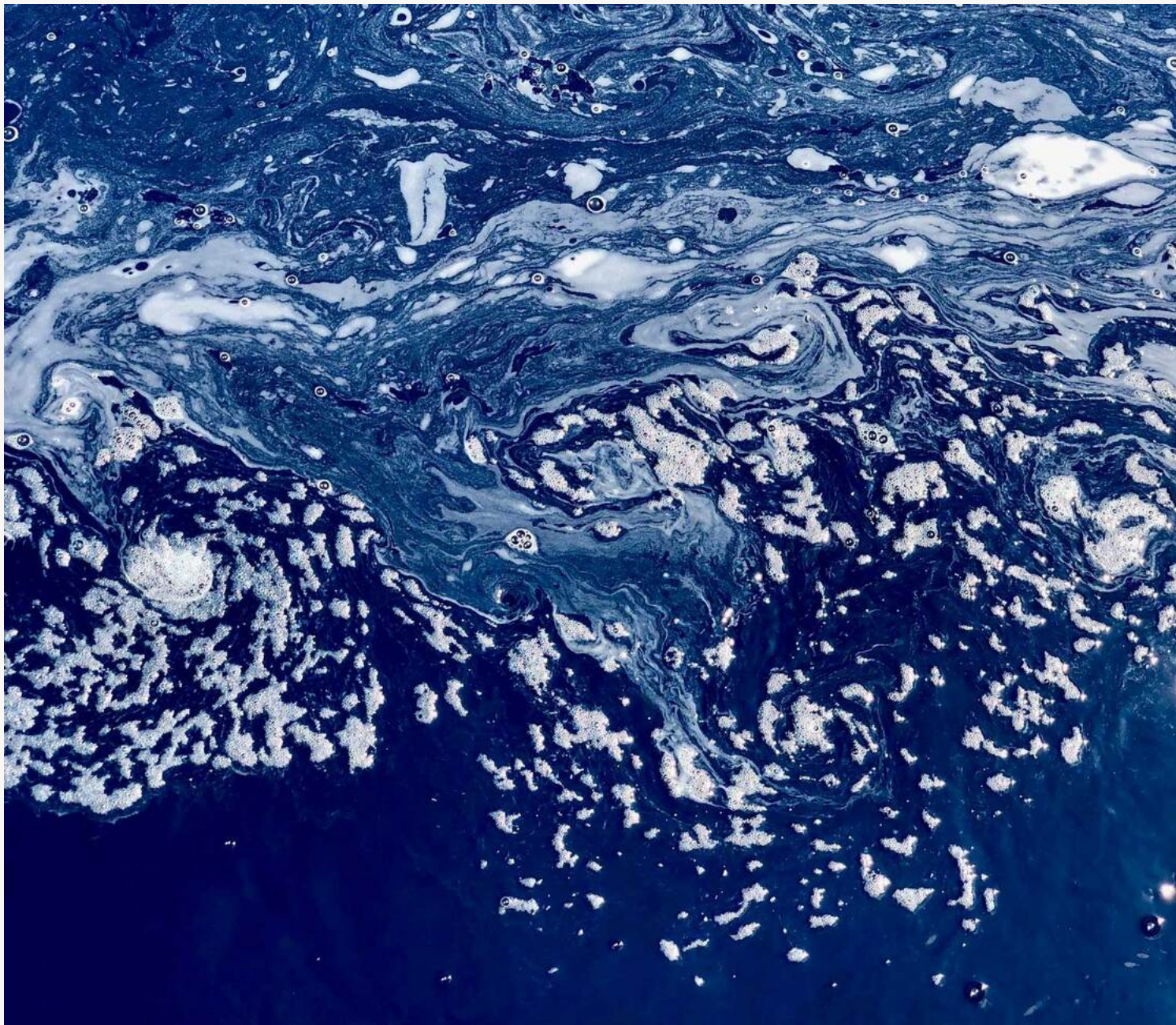
¹⁸ Tier 1 is cut and sew garment factories. Tier 2 is fabric knitting, weaving, and dyeing mills.

¹⁹ Excludes BR Home factories.

Environment

We are a driving force in our industry and partner with businesses, nonprofits, and governments to advance environmental sustainability in our industry. We incorporate sustainable practices into product development and focus on addressing climate, water, and waste issues to positively impact people and the planet.

- Climate Action
- Water Stewardship
- Product
- Circularity and Waste





Placement of an acoustic sensor in water pipeline to detect leaks. | Image courtesy of FIDO Tech.

Reducing our environmental footprint and transitioning to renewable energy sources is a core component of our business strategy and our company’s future. Water, from water scarcity and water quality to extreme weather events such as flooding or drought, is inextricably linked to changes in our global climate. Water is also a key resource to our business, as it’s used in the production of cotton and manufacturing of our products.

Gap Inc. is partnering with [FIDO Tech](#) to find and repair leaks in pipeline infrastructure across Bangalore, India. This collaboration will improve water resilience and enhance water availability for communities, industries, and ecosystems in a region that has growing demand on a dwindling and increasingly erratic water supply.

FIDO Tech uses artificial intelligence (AI) and acoustic sensors to detect the largest and often unseen leaks in water pipelines.

Together with Bangalore’s water utility provider, Bangalore Water Supply and Sewerage Board, this project will reduce water waste and build a stronger, more reliable water supply infrastructure.

Water stress impacts our company and the communities we serve. This project improves operational resilience and controls water-related costs for our suppliers and advances our 2030 goal to reduce and replenish 100% of the water used in manufacturing.

“Water stress is rapidly becoming a defining feature of the climate crisis, yet many communities lack the resources to invest in the new technologies which will shift the dial. We’re proud to be partnering with Gap Inc. to accelerate the adoption of FIDO AI on Bangalore’s water network to make an impact on water resilience to support the garment industry and benefit communities.”

– VICTORIA EDWARDS | CEO AND FOUNDER, FIDO TECH

Bridging the Climate Gap

Climate Action

We align our goals and strategies with leading climate science and industry best practices to reduce our carbon footprint and safeguard our company against the impacts of climate change.

GOALS BY 2030	PROGRESS
Reduce Scope 1 and 2 greenhouse gas (GHG) emissions by 90% from a 2017 baseline	74% reduction from 2017 to 2024
Reduce Scope 3 GHG emissions from purchased goods and services by 32.5% from a 2017 baseline	13% reduction from 2017 to 2024
Source 100% renewable electricity for our company-operated facilities globally	52% of electricity use from company-operated facilities was from renewable sources in 2024
GOAL BY 2050	PROGRESS
Achieve net-zero carbon emissions across our value chain	17% reduction from 2017 to 2024

Our 2030 emissions-reduction targets and 2050 net-zero target are approved by the Science Based Targets initiative (SBTi), using the market-based methodology for Scope 2.

OUR APPROACH

We recognize our responsibility as a global company to align our decarbonization efforts with science and take meaningful climate action. We are aligned with the core commitment of the Paris Agreement to pursue efforts to limit global temperature rise to less than 1.5 degrees Celsius and are committed to the United Nations Framework Convention on Climate Change (UNFCCC).

We are pursuing the following levers to decarbonization:

DIRECT OPERATIONS

Operational Efficiency: We continuously increase energy efficiency across our stores, distribution centers (DCs), and headquarters by updating building and energy management systems; lighting; heating, ventilation, and air conditioning (HVAC) systems; roofing; and modes of transportation.

Renewable Electricity Procurement: We aim to expand our North American renewable electricity investments with onsite and offsite solar and wind projects.

SUPPLY CHAIN

Because the majority of our emissions are from Scope 3 Category 1 (purchased goods and services), we partner with our suppliers to accelerate their decarbonization strategies. We also monitor basic [supplier compliance](#) with our Code of Vendor Conduct’s environmental standards.

Fiber Conversion: We are converting priority fibers in our [products](#) to lower-carbon-impact alternatives and are seeking more precise life cycle assessment data of our preferred raw materials to further connect our product and climate strategies.

Coal Phase Out: Our facility approval process prohibits any new facilities from utilizing onsite coal, and we engage with the UNFCCC working group on coal phase out.

Efficiency: We help improve supplier operational efficiency through a portfolio of partner programs.

Renewable Electricity: We help suppliers convert to renewable electricity by supporting them in finding capital investments or offsite procurement and partner with UNFCCC working and policy groups to explore renewable and biomass electricity alternatives in our supplier regions.

Vendor Allocation: We consider suppliers’ carbon intensities when awarding business.

Insets and Offsets: We support nature-based solutions such as regenerative agriculture and watershed restoration and consider carbon offset opportunities.

Our supply chain levers are enabled by:

Data Management: We track our suppliers’ decarbonization performance, corrective action plan (CAP) management, and monthly energy and water consumption data, and we require suppliers to complete the Higg Index Facility Environmental Module (FEM) annually.

Financing: We participate in collective action programs to support suppliers in financing capital investments toward renewable electricity or coal phase out.

Target Setting: We support our strategic suppliers in setting science-aligned or science-based targets (SBTs) and creating detailed decarbonization roadmaps.

Policy Advocacy: We advocate for favorable policies in priority supply chain geographies through groups such as UNFCCC and Industry Summit.

2024 PROGRESS

In 2024, we updated our SBT to reduce Scope 3 emissions from purchased goods and services from 30% to 32.5% by 2030 (from a 2017 baseline).

We conducted a stakeholder feedback session on our climate strategy and refreshed our climate scenario analysis of physical and transitional climate-related risks.

Learn more: [Risk Management](#)

DIRECT OPERATIONS

Operational Efficiency: Approximately 37% of our stores in North America are enabled with energy management systems (EMS). These stores use approximately 9% less electricity per square foot than non-EMS enabled stores.



At our DCs, we’re replacing diesel combustion engine shunt trunks, used to move trailers, with electric-powered models. Our DC in Fishkill, New York, completed the transition in 2023, and in 2024 we expanded this project to our DC in Fresno, California.

Renewable Electricity Procurement: We have invested in three projects since 2020, which contributed to a 74% reduction in Scope 1 and 2 emissions from 2017 to 2024.

- Aurora Wind virtual power purchase agreement (VPPA), a 90-megawatt offsite wind farm in North Dakota.
- Fern Solar VPPA, a 7.5-megawatt offsite solar project in North Carolina, which has offset 100% of Athleta’s store electricity in North America since 2021.
- 3-megawatt onsite solar installation at our DC in Fresno, California. The project generates approximately 33% of the facility’s annual electricity usage.

Climate Action
Continued

SUPPLY CHAIN

Data Management: In 2024, 100% (567) of our Tier 1 suppliers completed the Higg FEM assessment and 92% (519) verified their responses; 75% (186) of our Tier 2 suppliers completed the assessment and 70% (174) verified their responses.

Financing: We developed a sustainable supply chain financing program with [Citibank](#) that offers a discounted interest rate to suppliers that perform highly on their verified Higg FEM questionnaire.

In 2024, Gap Inc. and other retailers joined the [Future Supplier Initiative](#). The initiative – backed by The Fashion Pact, Apparel Impact Institute, consultancy firm Guidehouse, and DBS Bank – offers brands financing models and technical support to help suppliers transition to low-carbon technologies and implement renewable energy solutions at the factory level.

Target Setting: We joined Cascale’s [Manufacturer Climate Action Program](#) (MCAP) to accelerate the adoption of science-aligned targets in our supply chain. In 2024, 22 vendors with 119 active facilities participated in MCAP.

Efficiency: As a founding member of the Apparel Impact Institute (Aii), we support our suppliers’ participation in its efficiency programs. In 2024, one of our strategic mill facilities completed Aii’s Carbon Leadership Program (CLP), which supports facility-level decarbonization action plan development. In 2024, supplier efficiency programs saved approximately 2,200 metric tons of CO₂e.

Renewable Electricity: As of the end of 2024, 13 of our strategic suppliers have VPPAs, and we are working to grow this number.

Vendor Allocation: Our Sourcing teams integrate sustainability metrics into vendor allocation decisions. In 2024, our denim vendor selection process prioritized vendors with proven sustainability programs.

Insets and Offsets: We contracted our first carbon insets, to be released in 2025, from the U.S. Cotton Trust Protocol (USCTP), which supports American farmers in implementing the U.S. Department of Agriculture’s Climate-Smart Agriculture practices.

GREENHOUSE GAS EMISSIONS ¹				
Metric Tons CO ₂ e	FY 2017 ^{2, 3}	FY 2022 ²	FY 2023	FY 2024
Scope 1	27,220	41,942 ⁴	36,164	39,569
Scope 2 (location-based)	379,837	247,085 ⁵	218,342	210,902
Scope 2 (market-based)	361,734	48,519	85,094 ⁶	59,753
Scope 3.1: Purchased goods and services ⁷	4,730,372	3,987,898	4,076,765	4,098,703
Scope 3.3: Fuel- and energy-related activities	15,518	13,299	18,498	51,664 ¹¹
Scope 3.4: Upstream transportation and distribution	514,832	169,045	263,233 ⁸	526,578 ¹⁰
Scope 3.5: Waste generated in operations	14,645	9,423	10,068	13,295
Scope 3.6: Business travel	48,801	4,582	2,186	21,119
Scope 3.7: Employee commuting	256,355	180,398	70,531	76,290
Scope 3.9: Downstream transportation and distribution	55,379	83,633	68,470	126,896 ¹⁰
Scope 3.11: Use of sold goods ⁹	2,095,886	1,177,004	936,193	977,583
Scope 3.12: End-of-life treatment of sold products	119,353	85,804	83,648	105,260
Scope 3.14: Franchises	28,531	27,325	24,651	25,715

Learn More: [CDP Reports](#)

¹ Our carbon accounting approach follows the GHG Protocol and uses the operational control approach to determine our organizational boundary. Our emissions have been verified at the limited assurance level. See our [Assurance Statements](#).

² As part of our SBT update in 2023, we recalculated our 2017 baseline and 2022 emissions. As a result, some updated metrics may not match our previous CDP Climate submissions or align with previous reports.

³ 2017 represents the base year for Gap Inc.’s net-zero goal and SBTs.

⁴ The Scope 1 increase in 2022 was driven by the new inclusion of hydrofluorocarbons (HFCs).

⁵ In our FY 2023 ESG Report, we disclosed our FY 2022 Scope 2 market-based emissions as 235,106, which reflected an update to our direct vs. franchise site boundaries made after we received assurance. After publication, we discovered that the site boundary change was incorrect and are restating these emissions to the correct value from our previously assured amount of 247,085.

⁶ The market-based Scope 2 increase in 2023 was driven by lower generation from our VPPA projects relative to previous years.

⁷ Scope 3.1 is based on calendar year data provided by our suppliers. Data is subject to change retroactively each year as we gain better visibility into our respective share of emissions with each of our suppliers.

⁸ The increase in Scope 3.4 from 2022 to 2023 was primarily driven by identifying and correcting inaccuracies in our primary data sources.

⁹ Scope 3.11 is not included in our SBTs and is primarily out of the control of Gap Inc.

¹⁰ The increase in Scope 3.4 and 3.9 from 2023 to 2024 was primarily driven by improved data completeness and accuracy.

¹¹ The increase in Scope 3.3 from 2023 to 2024 was driven by an update in emission factor methodology.

Water Stewardship

We are investing in community water resilience and reducing our water usage with more efficient approaches to manufacturing. This builds the resilience of our company, our supply chain, and the people who make our clothes.

GOALS BY 2030	PROGRESS
Empower 5 million people touched by the apparel industry to improve their equitable access to clean water and sanitation	2.6 million people reached since 2017
Reduce water use and replenish water to nature, equivalent to 100% of the water used in manufacturing apparel and in our company-operated facilities	14% achieved in 2024 – we reduced or replenished 3.9 billion liters of water and consumed 28 billion liters from manufacturing apparel and our company-operated facilities
GOALS BY 2050	PROGRESS
Achieve net positive water impact in water-stressed regions	Built roadmaps and began implementation of several initiatives to progress on intermediary 2030 goals
Support a water-resilient supply chain	



OUR APPROACH

At Gap Inc., we believe access to water is a human right, and we recognize that water stewardship is required to mitigate the negative impacts of climate change on our business and in the communities where we live and work. The water crisis is already acute in many of the apparel industry’s key sourcing countries, with women facing disproportionate barriers to safely access water, sanitation, and hygiene (WASH) services. Beyond its implications for human health and hygiene, water stress²⁰ also impacts biodiversity and water ecosystems, including in areas where cotton is grown.

We take a three-pronged approach to our water stewardship strategy and tailor it to meet unique geographical contexts.

Reduction: We reduce water used in manufacturing, increase recycling, improve wastewater quality, and develop context-based targets with suppliers to implement water quality and efficiency projects.

Replenishment: We replenish and restore water in priority water-stressed basins²¹ where our cotton is grown, clothing is manufactured, and customers and employees live, and we partner with suppliers to reduce water-related operational risks.

Access: We improve equitable access to clean water and sanitation in communities impacted by our industry.

We drive compliance to our [Code of Vendor Conduct \(COVC\)](#) in order to monitor suppliers’ environmental impacts, reduce water used in manufacturing processes, and increase WASH accessibility. Finally, our [COVC](#) requires that the essential WASH needs of garment workers are met. Supporting human health and hygiene strengthens Gap Inc., our suppliers, and worker communities.

²⁰ [European Environment Agency](#): Water stress occurs when the demand for water exceeds the available amount during a certain period or when poor quality restricts its use.
²¹ Basin: the geographical region in which water is captured, flows through, and eventually discharges – or the area from which a site extracts water or discharges effluent.

Water Stewardship

Continued

2024 PROGRESS

REDUCTION

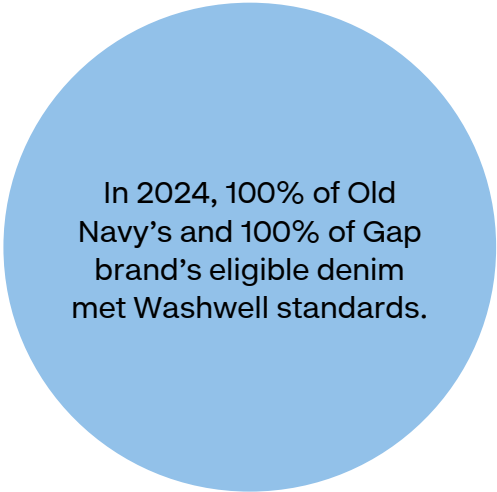
In 2024, we partnered with four suppliers to assess watershed risks and develop action plans, including through participation in the [Alliance for Water Stewardship’s Impact Accelerator](#) in Chennai, India. Suppliers identified and invested in solutions such as water recycling to reduce their water risks. We plan to expand this work with additional suppliers in high-risk watersheds.

Arvind Water Partnership: Eliminated the use of freshwater in Arvind denim mills by using purified municipal wastewater, helping preserve the local freshwater supply. Gap Inc.’s partnership with India-based supplier Arvind Limited aims to replace over 1 billion liters of freshwater annually with reclaimed wastewater.

Together with Arvind, we launched the 18,000-square-foot Global Water Innovation Centre for Action (GWICA) in India in January, 2024.²² Throughout the year, GWICA piloted several emerging infrastructure-related technologies to identify positive water impacts. To expand impact, GWICA experts are designing a training curriculum to build capacity with suppliers across the region.

Washwell: Saved 1.1 billion liters of water in 2024, for a total of 6.0 billion liters saved since 2016. Washwell reduces water use in garment finishing by at least 20% compared to conventional wash methods, with program outputs validated by the World Resources Institute (WRI) in 2023.

²² [Sourcing Journal](#)
²³ [WaterEquity](#)



Currently, Washwell is led by denim assortments but is expanding to woven bottoms and garment-dyed knits.

Water Quality Program (WQP): This year, all Tier 1 suppliers and strategic Tier 2 facilities that use wet processing and/or chemicals in production (approximately 300 facilities) participated in WQP, which mandates wastewater testing and submission of Chemical Inventory Lists (CILs). Through WQP and our [vendor compliance](#) approach, we support suppliers in identifying and applying necessary corrective measures to improve chemicals and wastewater management.

Learn more: [Product: Chemicals Management](#)

REPLENISHMENT

In collaboration with Global Water Challenge, we launched our first water replenishment project with Parmarth Samaj Sevi Sansthan (PSSS) to construct a groundwater recharge system, implement watershed restoration solutions, and provide technical water management training to local farmers. This will strengthen basin health in priority, high water-stressed regions along our value chain.

ACCESS

Since 2017, we have reached over 2.6 million people with improved WASH services – on track to reach our goal of 5 million by 2030.

The Women + Water Collaborative: Developed in partnership with the Water Resilience Coalition (WRC), WaterAid, Cargill, and GSK – the Collaborative provides water-stressed communities in India with access to WASH services and conserves and replenishes water in priority river basins.

This year, we conducted groundwork assessments for water supply enhancement and leadership training modules in select water-stressed river basins. We also welcomed three new partners to the Collaborative.

WaterEquity: We contributed to WaterEquity’s Water and Climate Resilience Fund, a \$100 million fund that invests in climate-resilient water supply and sanitation infrastructure, such as bulk water supply, wastewater treatment, and water reuse.²³

WATER CONSUMPTION AND SAVINGS			
LITERS OF WATER (in millions)	FY 2022	FY 2023	FY 2024
Company-operated water consumption	892	895	767
Supply chain water consumption	32,000	26,600	27,200
Total water saved	4,800	3,500	3,900
Water reduced by Washwell	1,400	985	1,100
Water reduced by Arvind Water Partnership	1,300	1,100	1,400
Water reduced by supply chain efficiency programs (like Aii)	1,400	261	230
Water replenished to nature	730	1,200	1,100

Water Risk Assessments

Our reduction and replenishment strategy is based on understanding how and where water stress affects our key sourcing regions. Using the WWF Water Risk Filter, we assessed all direct operations and supply chain sites to identify high water-risk areas. Our 2024 climate scenario analysis revealed that water risks, such as scarcity or flooding, may pose climate-related risks across our value chain.

To address this, we are targeting suppliers with high water usage in South and Southeast Asia and Central America that face chronic and acute water risks. We aim to set contextual water targets and assess appropriate water-saving technologies with these suppliers. In 2024, we piloted contextual water targets with three suppliers in high-risk basins, using data on local watershed stress to create a roadmap for improving water use efficiency, reducing pollution, and mitigating water scarcity risks. Our FIDO Tech partnership exemplifies these efforts.

Learn more: [Risk Management](#), [Climate Action](#)

Product

Our design choices and the raw materials we use influence the environmental and social impacts of our products. We aim to make fiber choices with a lower carbon footprint and that use less water, create less waste, and support efforts to protect biodiversity.



GOALS BY 2025	PROGRESS
Source 100% of cotton from more sustainable sources	98%
Source at least 45% of polyester from recycled sources	40%

OUR APPROACH

RAW MATERIALS AND PRODUCT

We enable teams to embed more sustainable materials into designs while establishing long-term supplier partnerships.

Our fiber portfolio includes cotton, synthetics, and cellulosics, among other fibers, with cotton and polyester being our priority fibers. Cultivation of cotton impacts land use, soil health, water, biodiversity, and climate change, as well as labor rights. Synthetics like polyester and nylon are commonly derived from non-renewable petroleum sources, and manmade cellulosic fibers (MMCFs) like rayon, modal, viscose, and lyocell are made of wood pulp from trees.

Our product sustainability strategy focuses on three areas:

Preferred Raw Materials: We engage with suppliers to identify and source preferred fibers and more sustainable materials.²⁴ We leverage Cascalé’s Higg Materials Sustainability Index (MSI) and Textile Exchange’s Preferred Fiber and Material Matrix (PFMM) to evaluate materials’ environmental impacts, resource use, and production conditions.

Traceability: We aim to strengthen traceability and certification standards for preferred fibers²⁵ and are working to establish full upstream supply chain visibility.

Product Claims: We evaluate [product marketing and communications](#) to help ensure our claims are accurate and substantiated. We offer internal trainings and tools to strengthen claims governance.

Our product sustainability efforts advance progress on our emissions and water goals and are aligned with our external commitments to The Fashion Pact and the UNFCCC Fashion Industry Charter for Climate Action.

CHEMICALS MANAGEMENT

Effective chemicals management in our product manufacturing is crucial to protecting the health of our customers, suppliers, employees, and the environment. Despite stringent controls, products may contain traces of unintentional chemicals from external factors like environmental contamination and recycled materials.

We manage chemicals in three phases:

Input Management: The selection of better chemical inputs and starting materials is essential to reducing the use and discharge of hazardous chemicals.

Process Management: Adherence to chemical management best practices during manufacturing is critical for reducing both human and environmental risks.

Output Management: The outputs of apparel and footwear manufacturing include finished products and wastewater.

We work to ensure product integrity by upholding stringent standards for production and finished products. We partner cross-functionally to eliminate chemicals of concern, adopt preferred chemistry, and audit products for Restricted Substances List (RSL) compliance.

We require supplier compliance with our COVC and Mill Compliance Agreement and expect suppliers to adhere to industry guidelines including the Apparel and Footwear International RSL Management (AFIRM) Group Restricted Substances List, the Zero Discharge of Hazardous Chemicals (ZDHC) Manufacturing Restricted Substances List (MRSL), and the ZDHC Wastewater Guidelines. We assess supplier performance through [vendor compliance](#) audits, Higg FEM, and work with suppliers to address nonconformances.

We track emerging chemical issues and update our approach as needed. Proactively addressing chemicals of concern helps prepare Gap Inc. for compliance with future regulations. In some cases, phasing out a chemical of concern has the potential to result in lower water and energy usage in production processes.

2024 PROGRESS

RAW MATERIALS AND PRODUCT

- We received recertification to Textile Exchange’s Content Claim Standard (CCS 3.0) and developed a strategy to utilize eTrackit for tracing products certified to Textile Exchange standards.
- We traced preferred fiber in over 82 million garments through the blockchain product traceability platform TextileGenesis™. In 2024, we continued onboarding suppliers to the platform and increased the number of preferred fibers and orders traced to scale fiber traceability.

²⁴ Defined as: Better Cotton (formerly BCI), verified U.S.-grown cotton (USCTP), organic, in conversion (to verified organic), recycled, or regenerative.

²⁵ Gap Inc. fiber data differs from our fiscal year and is derived on a seasonal calendar from purchase order materials data for all brands, excluding BR Home products. We currently do not trace fiber consumption for franchises or VMI (vendor-managed inventory) because their data is not in our booking system. We have limited visibility into third-party licensing and accessories, but are continuously improving this connection.

Product
Continued

- Gap brand piloted Traceable Better Cotton with a strategic supplier in India. Products from this pilot were on market during fall 2024.
- Gap brand expanded sourcing of regenerative cotton through the regenagri and Good Earth Cotton standards, notably in its denim assortment. The brand continues to support nearly 2,500 farmers in their transition to certified organic cotton, and is on track for transition to organic cotton in fall 2025.
- Athleta and Ambercycle [announced](#) efforts to leverage textile-to-textile recycled materials in Athleta products starting in 2026. Athleta plans to become the first performance apparel brand to use cycora® at scale.
- In partnership with LanzaTech, Athleta’s new Studio Rib collection features fabric made with 75% polyester partially derived from recycled carbon emissions.
- Athleta reached 100% lower-impact manmade cellulosic fibers²⁶ across its assortment.
- Banana Republic introduced European Flax Standard-certified linen product into its assortment in summer 2024.

CHEMICALS MANAGEMENT

- In 2024, we strengthened and expanded our documentation and product-testing requirements to maintain the elimination of intentional use of PFAS-based finishes achieved in 2023. We continue to work with

our suppliers and industry partners to address risk of unintentional PFAS contamination.

- To mitigate use of dimethylformamide (DMF) in production of conventional polyurethane-coated fabrics, our Quality team conducted audits of relevant fabric mills and is working with mills to improve production practices. We have started to scale sourcing of water-based polyurethane (made without DMF).
- More than 200 Tier 1 and strategic Tier 2 suppliers received chemicals management trainings.

NATURE AND BIODIVERSITY

Nature is a complex system affecting climate, water, biodiversity, and local communities in our supply chain.

We are in the early stages of exploring our approach to nature. In 2023, we conducted a land-use assessment of our natural fibers and leather with Conservation International to better understand the impact of our raw materials. We also assessed our Forest, Land, and Agriculture (FLAG) emissions footprint. While we did not meet the threshold for setting a FLAG science-based target, we continue exploring how to integrate nature-based solutions into our [climate roadmap](#).

Learn More: [Animal-Derived Materials Policy](#), [Wood-Derived Fabric Policy](#)



Industry Collaboration

Gap Inc. engages with industry standards, working groups, and organizations to advance preferred material sourcing and claims, including:

Textile Exchange

- Preferred Standards (Organic Content Standard, Global Recycled Standard, Recycled Claim Standard, Responsible Wool Standard, Responsible Down Standard)
- Participation in rPET Round Table, Biosynthetics Working Group, Organic Cotton Round Table, and Unified Standard Working Group

Leather Working Group

U.S. Cotton Trust Protocol

- Board member

Better Cotton

- Participation in Better Cotton
- Traceability panel

The Aid by Trade Foundation (AbTF) Good Cashmere Standard

European Flax Standard

The Micofibre Consortium

CanopyStyle

regenagri

Good Earth Cotton

²⁶ Athleta’s lower-impact manmade cellulosic fibers include LENZING™ ECOVERO™ rayon, TENCEL™ lyocell or modal, and Cupro.

Circularity and Waste

We consider the full life cycle of our clothing and strive to adopt more circular business models and minimize waste.

GOALS BY 2025/2030	PROGRESS
Eliminate unnecessary or problematic plastics in packaging to consumers by 2025 and in packaging to businesses by 2030, in line with our Fashion Pact commitments	26% of unnecessary or problematic plastics in packaging to consumers has been eliminated and replaced with paper or other reusable alternatives
Ensure at least half of all plastic packaging is 100% recycled content, for packaging to consumers by 2025 and in packaging to businesses by 2030, in line with our Fashion Pact commitments	80% of all plastic packaging to consumers is made with 100% recycled content – achieving the 2025 target

OUR APPROACH

CIRCULARITY

While most textiles are currently handled in a linear system, circularity offers our industry the opportunity to innovate to grow market share while reducing environmental impacts. We implement basic principles of circularity into our operations:

Design for Circularity: Prioritizing product longevity, reuse, and recyclability in our designs while enhancing product quality assurance to extend the life of garments and reduce waste.

Materials and Manufacturing: Maximizing use of safe, renewable, and recycled materials, and innovating for circular manufacturing.

Advanced Resource Recovery: Support systems for collecting, sorting, and recycling worn textiles into new materials for the fashion industry.

Circular Business Models: Exploring partnerships that create new value propositions for our customers and brands while implementing precise forecasting and efficient inventory management.

WASTE

We tackle unnecessary and problematic plastic packaging waste with a three-part strategy:²⁷

- Eliminate and substitute plastic packaging with non-plastic alternatives. Our focus is on reducing waste from hangers, shopping bags, polybags, and e-commerce mailers, which form the majority of our packaging.
- Divert plastics from landfill through recycling when feasible.
- Convert necessary plastics to non-virgin materials.

2024 PROGRESS

- Maintained 100% recycled content in polybags and polymailers to ensure at least half of plastic packaging contains recycled content.
- Maintained 100% transition from plastic to paper shopping bags to support our goal to eliminate unnecessary or problematic plastics in packaging to consumers.
- Reached 38% of all plastic packaging to businesses made with 100% recycled content.
- Diverted more than 848,800 clothing items from landfill through our partnership with ThredUp® that encourages customers to send in a Clean Out Kit in exchange for shopping credit at participating brands (Gap, Athleta, Banana Republic, which contributed 6%, 82%, and 12% of diverted clothing respectively).
- Sold nearly 11,300 Athleta items through Athleta’s Preloved site hosted through ThredUp® in 2024, for a total of nearly 30,600 since launching in 2022.
- Diverted approximately 4,200 pounds of plastic from landfill through a pilot to recycle plastic film from Banana Republic stores in partnership with EcoEnclose. The pilot’s success indicates an opportunity to expand plastic film recycling to more stores.
- Banana Republic’s tailoring and alteration program serviced approximately 11,100 items by offering customers a way to extend their products’ life cycle and find a custom fit (in select stores).
- Prepared for compliance with extended producer responsibility (EPR) legislation in North America by collaborating with producer responsibility organizations and ensuring proper data management. Additionally, we are aligning our product-related sustainability targets with circular design principles,

focusing on material selection that prioritizes recycled content and reducing unnecessary plastics in packaging.

- Funded an event on Earth Day in collaboration with California Product Stewardship Council. The event provided Gap Inc. employees with context on the textile recycling process and showcased a Near Infra-Red (NIR) scanner that demonstrated how garments are sorted by their material type.
- Held a cross-brand “Design for Circularity” workshop facilitated by Cascade Circular. A cohort of employees were educated on Ellen MacArthur Foundation’s Circular Design Principles and learned how to improve garment recyclability.

²⁷ In line with our commitment to The Fashion Pact’s Ocean Pillar, we use the Ellen MacArthur Foundation’s definition of unnecessary and problematic plastic that consists of five criteria. All our B2C packaging is categorized as necessary, unnecessary, problematic, or non-problematic. Depending on the category, it is either set for elimination, diversion, or conversion.

Social

We are committed to breaking down barriers through collaboration and innovation. The first Fortune 500 company to announce equal pay for equal work, Gap Inc. went on to build an industry-leading gender equity and empowerment program for international garment workers. We unlock access to economic opportunities for the people and communities where we operate and cultivate an inclusive culture so that our employees and customers thrive.

- Human Rights
- Factory Programs
- Opportunity Programs
- Inclusion and Belonging
- Human Capital Management
- Employee Engagement and Corporate Giving



Human Rights

We are dedicated to respecting human rights across our direct operations and supply chain through continuous stakeholder engagement and rigorous due diligence. Supporting basic human rights is fundamental to how we operate our business.

OUR APPROACH

We create safe and supportive workplaces that advance workers’ well-being and provide opportunities for personal and professional growth, enhancing worker recruitment, retention, motivation, and productivity.

Our strategies and policies foster a safer, more equitable environment for workers across our value chain, and safeguard against forced labor, child labor, and discrimination. We have an anti-retaliation policy and do not tolerate threats or attacks against human rights defenders.

DIRECT OPERATIONS

In our direct operations, our [Code of Business Conduct](#) (COBC) is the foundation for corporate compliance. Anyone who conducts business with or is affected by Gap Inc. can raise any concerns through our confidential [24/7 COBC Hotline](#), managed by an independent third party. All suspected COBC and human rights violations are protected by strict enforcement of the company’s policy of zero tolerance for retaliation. We also protect our employees’ [occupational health and safety](#) by training our employees and conducting regular internal and third-party safety audits at our stores and distribution centers (DCs).

SUPPLY CHAIN

In our supply chain, our [Human Rights Policy](#) and [Code of Vendor Conduct](#) (COVC) form the cornerstone of our human rights and social dialogue approach. These policies cover all salient human rights issues (listed to the right), align with local labor laws in the jurisdictions where we operate, and are based on internationally recognized frameworks, including:

- UN Guiding Principles on Business and Human Rights
- UN Global Compact (UNGC)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- International Labour Organization’s (ILO) Core Conventions

Our COVC is available in [24 languages](#). Our policies and COVC are enforced through our [Vendor Compliance](#) program, which tracks suppliers’ assessment and remediation performance.



HUMAN RIGHTS DUE DILIGENCE AND STAKEHOLDER ENGAGEMENT

We consistently engage with stakeholders and conduct routine human rights due diligence to address human rights concerns effectively. This includes regular assessments and updates to our policies based on stakeholder feedback and evolving regulations.

Learn more: [Stakeholder and Political Engagement](#)

Our Human Rights Issues

The issues below are aligned with international labor standards and the expectations outlined in our COVC and Human Rights Policy. We intend to conduct a saliency assessment in 2025.

Our primary areas of focus – South, East, and Southeast Asia, Central America, and the Middle East – are determined by where we source our materials and the highest risks associated with the following issues:

- Child Labor and Young Workers
- Discrimination and Harassment, Gender-Based Violence and Harassment, Gender Equality, and Inclusion
- Wages and Benefits
- Occupational Health and Safety (including 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

Learn more: [Human Rights and Labor Issues](#)

Human Rights

Continued

2024 PROGRESS

Stakeholder Engagement: We met with stakeholders (factories, vendors, and gender, labor, and human rights groups) on a regular basis, with at least one engagement every week. These connections supported stakeholder consultations to refine our human rights strategies and address specific concerns about human rights impacts.

2024 also marked two years of the Dindigul Agreement, an innovative agreement between brands, suppliers, and labor groups to address gender-based violence and harassment (GBVH) at the Natchi Apparel factory in Tamil Nadu, India. Cornell University’s Global Labor Institute released a [report on their independent assessment](#) of the agreement, indicating significant progress in eliminating GBVH at Natchi Apparel.

This year we joined a multi-stakeholder collaborative project, “Harvesting the Future – Cotton in India,” to improve working and living conditions of cotton farmers and workers in two districts in Madhya Pradesh. Under the coordination and technical guidance of the [Fair Labor Association \(FLA\)](#) and with the support of local civil society organizations, we are collaborating with over 25 peers, suppliers, and local implementing partners.

Policies: In 2024, we launched our Mill Compliance Agreement, which expands oversight to our Tier 2 mills nominated by our Tier 1 vendors. The aim is to increase upstream visibility to help ensure compliance with global regulatory requirements and human rights policies.

Worker Safety: Following the signing of the International Accord and joining the Pakistan Accord to enhance health and safety standards in factories in 2023, we began onboarding our vendors to the program and conducting factory assessments. This builds on our existing efforts to protect water safety in Bangladesh, Cambodia, India, Indonesia, and Vietnam.

Wage Analysis: In 2024, we piloted wage tools with our Tier 1 suppliers in Bangladesh, Cambodia, India, and Vietnam. We gathered data on workers’ wages to better understand the fairness of payment systems and how worker wages cover their costs of living.



U.S. Labor Delegation in Bangladesh

In November 2024, Gap Inc. joined leaders from the U.S. government, expert labor stakeholders, and industry peers to encourage the Bangladesh government to improve working conditions in the country’s ready-made garment sector. The delegation met with high-level government officials from the labor and commerce departments and the Chief Adviser of the Interim Government of Bangladesh, Muhammad Yunus.

The delegation was held in response to worker protests for higher minimum wages, and in the context of the government transition in Bangladesh.

Specifically, we advocated for the minimum wage-setting process to be updated annually using a data-based mechanism and supported labor reforms that will better protect workers and allow the industry to continue to grow.

As a result of the delegation, the Bangladesh government plans to prioritize and complete the proposal for labor reforms in the next year.



For over a decade, we have led initiatives to remove barriers to women’s advancement and empowerment.

In 2007, Gap Inc. partnered with the International Center for Research on Women (ICRW) and Swasti Health Resource Center to develop a program to support the professional and personal growth of women garment workers. Since its launch, P.A.C.E. (Personal Advancement & Career Enhancement) has impacted more than 1.6 million women in factories and communities across 25 countries.

P.A.C.E. was just the beginning. We recognized the need to scale through collective investments with industry stakeholders. In 2023, Gap Inc. partnered with global leaders in gender equality – BSR’s HERproject™, CARE, and ILO-IFC’s

Better Work – to found RISE: Reimagining Industry to Support Equality.

RISE has proven effective in consolidating resources, enabling knowledge exchange, and growing the impact of women’s empowerment programs beyond Gap Inc. factories. As of the end of 2024, in partnership with over 30 of the largest companies in the apparel, footwear, and textile industries, RISE has delivered programs in over 230 workplaces, reaching nearly 469,900 women workers across six countries.

This year, one of Gap Inc.’s largest vendors, ShinWon Corporation, joined RISE. ShinWon began implementing P.A.C.E. across its factories in 2014, expanding beyond those that supply Gap Inc.

As a founding member of RISE, Gap Inc. is proud to build on P.A.C.E.’s legacy to create a more equitable future for women workers, together.

“Based on our early experience collaborating with RISE, I firmly believe that RISE supports a better working environment. Not just for women workers, but for all. This year, based on positive results, we have expanded RISE programs in our factories in partnership with Gap Inc. and Macy’s, two other RISE members. We look forward to driving more positive change for women employees in our industry together with RISE.”

– JJ PARK | CEO OF SHINWON

Bridging the Equity Gap

Factory Programs

We aim to foster better working conditions for factory employees outside of the U.S., with a focus on bridging the equity gap for women by supporting their leadership potential.

GOALS BY 2025	PROGRESS
100% of our strategic factories are investing in women’s empowerment through participation in P.A.C.E./RISE	85% of strategic factories are participating in P.A.C.E. or RISE
100% of workers employed in our strategic factories will have their voices heard through representative workplace committees	100% of strategic factories have representative workplace committees
100% of our strategic factories will have achieved gender parity at the supervisor level	40% of strategic factories have achieved gender parity at the supervisor level
100% of our factories will have prevention and response management systems and trainings in place to address gender-based violence and harassment	98% of factories have prevention and response management systems and training in place to address gender-based violence and harassment

OUR APPROACH

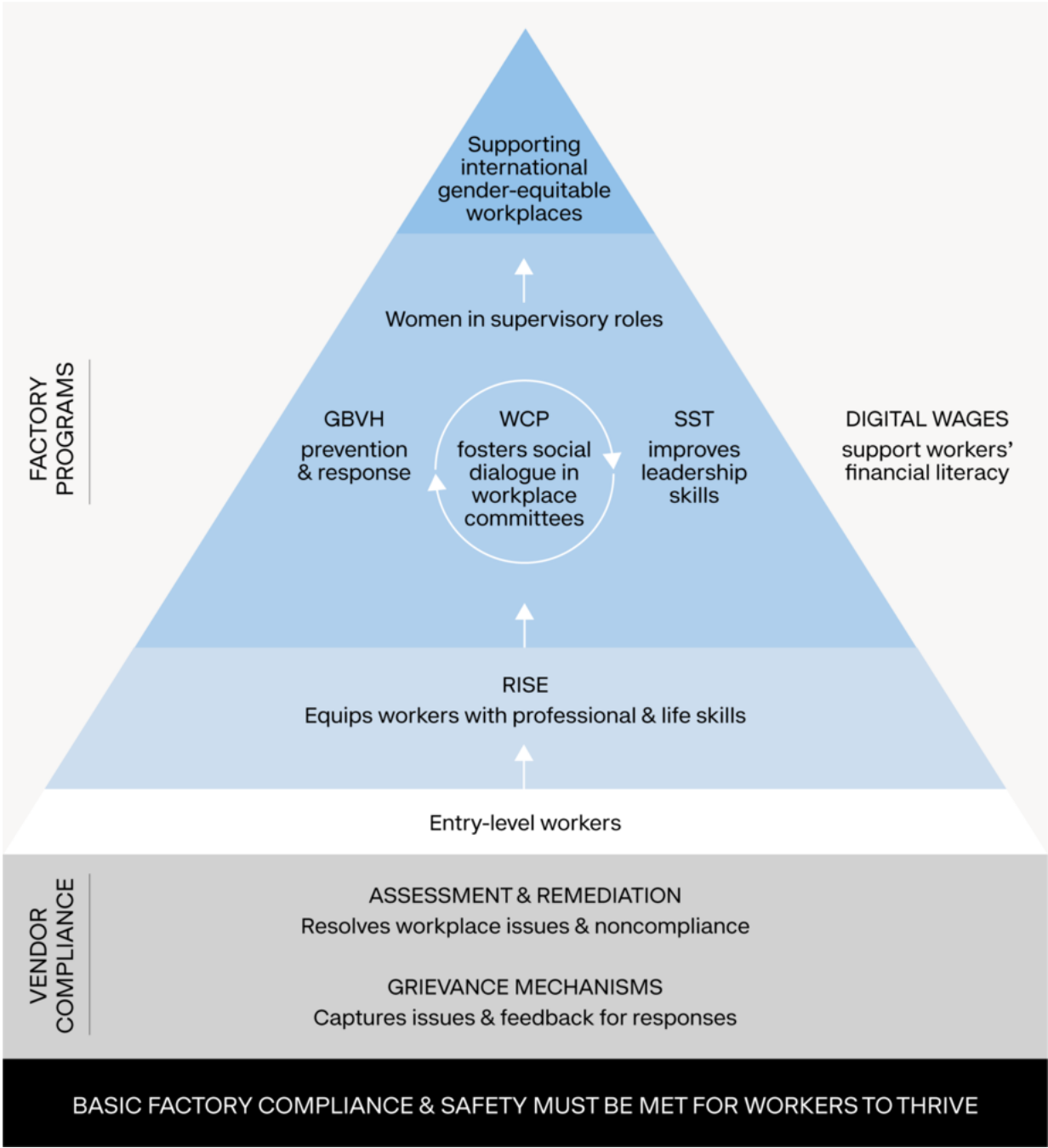
In partnership with suppliers, peer companies, NGOs, industry associations and communities, our capability-building programs seek to improve worker representation, cooperation, and economic advancement in our supply chain.

Our programs focus on women’s empowerment to account for the fact that the majority of workers in the apparel supply chain are women.

- We engage our suppliers in these workplace programs:
- RISE/P.A.C.E. Workplace
 - Workplace Cooperation Program (WCP)
 - Supervisory Skills Training (SST)
 - GBVH Prevention and Response
 - Digital Wages

ILO-IFC Better Work supported the development of WCP, SST, and GBVH Prevention and Response. They also support program implementation through the Better Work Academy, which Gap Inc. helped establish in 2018.

We partner with our vendors to help ensure these programs are sustainable and scalable, and support their efforts to become preferred employers in the communities where they operate.



Factory Programs

Continued

2024 PROGRESS

RISE

Founded in 2023, RISE brings together leading apparel and fashion brands, manufacturers, civil society groups, and trade unions to advance gender equity outside the United States. Designed and delivered based on proven concepts from Gap Inc.’s P.A.C.E. program, RISE provides garment workers with the skills needed to advance in work and life. Our Tier 1 suppliers’ participation in RISE is captured in our vendor scorecard and is a requirement for strategic vendors outside of the U.S.

RISE provides men and women training on topics such as communication, problem-solving, financial literacy, worker rights and responsibilities, and sexual and reproductive health. As a founding member, Gap Inc. serves on the RISE Steering Committee and participates in technical working groups.

In 2024, 85% of Gap Inc.’s strategic factories participated in RISE or P.A.C.E. Workplace, and nearly 98,000 garment workers received training. We began transitioning P.A.C.E. training to RISE in an initial six countries (Bangladesh, Cambodia, China, India, Indonesia, Vietnam) with plans to continue to scale the combined effort.

After more than a decade delivering P.A.C.E. in the community, reaching 1.2 million people in 22 countries, we are evolving our international gender equity programs. We are committed to scaling RISE in the workplace and transitioning away from delivering P.A.C.E. in the community.

WORKPLACE COOPERATION PROGRAM

Launched in 2016, WCP provides training to factory bipartite committees on workplace communication, risk assessment, problem-solving, health and safety, gender dynamics, and [ILO’s Core Conventions](#) on fundamental rights. Bipartite committees consist of elected representatives from management and production lines and are designed to build stronger industrial relations, foster dialogue, and enable issue resolution.

In 2024, Gap Inc. vendors implemented WCP in eight countries, reaching a total of 359 factories since the program began.

Results from participant surveys indicate that bipartite committees help workers more confidently voice concerns, generally leading to faster resolutions and reducing the need for more traditional assessment and remediation processes.

SUPERVISORY SKILLS TRAINING

Launched in 2018, SST trains existing and prospective supervisors on listening, fairness, conflict resolution, and time management. The program encourages gender equity in the workplace.

Since 2018, SST has been implemented in 54% of Gap Inc.’s Tier 1 suppliers, completed by approximately 24,600 current or prospective supervisors (54% of whom are women). At 155 factories, at least 90% of current supervisors have undergone training.

Results from the evaluation of SST indicate that supervisors who received the training are more respectful, treat workers better, and are better equipped to respond to workers’ grievances, which can improve workplace culture and positively impact productivity.

SST also helps prepare women for supervisory roles. The percentage of women supervisors at our strategic suppliers increased from 45% in 2021 to 58% in 2024, despite low staff turnover and limited promotion opportunities. Gap Inc. continues to collaborate with our suppliers and RISE to better understand and address the systemic barriers limiting women garment workers’ career growth.

GENDER-BASED VIOLENCE AND HARASSMENT PREVENTION AND RESPONSE

Launched in 2018, our GBVH prevention and response training raises GBVH awareness among employees. We maintain a zero-tolerance policy for physical, psychological, and sexual harassment, and review and improve our factories’ GBVH policies and grievance mechanisms, support government GBVH policies, and tailor our trainings to align with legislation.

When we identify GBVH cases, we collaborate with factories to conduct investigations, provide protection for the survivor, and resolve issues. Perpetrators face consequences and possible dismissal, as outlined in Gap Inc.’s policy. Our top priority is safeguarding survivors, working to guarantee their job security and fostering a safe environment for employees to report cases without fear of retaliation.

510 factories are participating in our GBVH Prevention and Response program.

DIGITAL WAGES

In 2017, in collaboration with the UN Better Than Cash Alliance, we began working to bridge the financial equity gap for workers by transitioning from cash-based to digital wage payment systems.

While common across the apparel sector, cash wages increase the likelihood of income loss or theft and present challenges for workers seeking formal financial services such as insurance, credit, or savings. We engage with factories, banks, and governments to educate, resolve regulatory barriers, and create accessible, affordable options.

Through these efforts, we increased the share of Tier 1 suppliers offering digital wage payment systems to 99% from 68% in 2017.

Learn more: [Supplier Compliance](#)

Fair Trade™

Since 2016, Athleta has contributed over \$3.3 million in community development funds directly to factory workers of four Fair Trade Certified™ factories. In 2024, 16% of the brand’s products were purchased from Fair Trade™ factories.

In 2024, Banana Republic onboarded a factory to the Fair Trade™ program that will launch product in 2025. The brand plans to expand to more factories.





Our founders envisioned a company that could bridge the opportunity gap for people and communities. Today, we use the scale of our business to enable access to opportunity for the people and communities where we operate, with programs and partnerships that open doors to better jobs and brighter futures.

In 2007, Gap Inc. formed This Way ONward to improve access to jobs and careers for youth aged 16–24. This opportunity program tackles socio-economic barriers to employment by partnering with community-based organizations that provide training and supportive services.²⁸

More than 27,000 young people like Drucilla have benefited from Gap Inc.’s investment in opportunity hiring. Drucilla “Dru” Boachie Yiadom was born and raised in Ontario,

Canada. The youngest of five siblings, Dru entered the foster care system at three-and-a-half years old. By the time she was 16, she desperately wanted a job. “I needed to know that once I aged out of foster care, I could survive without having to rely on anyone else,” said Dru. Introduced by her social worker to This Way ONward, Dru found a pathway to independence and hasn’t looked back.

A quick learner and ambitious teenager, Dru quickly excelled in the program and started an entry-level position at Old Navy. 13 years later, Dru has climbed the ladder from part-time Associate to General Manager. And she doesn’t show signs of stopping. In 2024, Dru won Old Navy’s 2024 Style Icon award, selected from the talented pool of all General Managers across North America.

Dru brings her commitment to excellence, compassion for customers and employees, and her strong belief in opportunity with her to work every day.

“When you walk through the doors to Old Navy, you have an opportunity to truly be who you want to be. No matter your age, no matter your size, or where you come from, you can find something that will truly be essential to you. A tank top, a pair of jeans ... for me, it was a job.”

– DRUCILLA BOACHIE YIADOM
This Way ONward participant and
General Manager, Old Navy Bramalea

Bridging the Opportunity Gap

²⁸ **Supportive services** refer to an organization’s offering or coordination of a holistic program of supportive services that are meant to be person-centered; in this context, employees may be best positioned to thrive in a job environment when they have stable housing, are food secure, have access to transportation, and have job-appropriate clothing. While job training may be the core service provided, the organization may also provide additional coordinated services to address housing, transit, food, clothing needs, and related services.

Opportunity Programs

Our opportunity programs advance economic opportunity and mobility in communities across North America while filling essential roles in our stores and DCs.

GOAL BY 2025	PROGRESS
Hire 5% of Old Navy entry-level store employees from This Way ONward annually	7.5%
Reach 20,000 youth through This Way ONward	27,000+ youth reached since 2007

OUR APPROACH

As the largest American specialty apparel company, our stores and DCs require thousands of employees to serve our customers. To meet our talent needs and address key barriers to employment, Gap Inc. invests in opportunity programs in the communities where we operate.

This Way ONward, Old Navy’s signature opportunity program, opens doors to economic opportunity for youth by:

- Partnering with community-based organizations to provide skills training and jobs for youth.

- Providing supportive services like transportation, clothing, financial education, and career coaching that are barriers to employment.
- Leveraging brand leadership, employee volunteers, and Field Team Grants to implement and uphold opportunity talent practices.

This Way ONward participants build confidence, reduce social anxiety, and develop transferable skills like communication and time management while expanding their professional social capital, as evidenced by our third-party evaluations.

Opportunity programs in our DCs target untapped talent in local communities and are tailored to the specific needs of each DC. These programs provide a range of services from free English language instruction for employees to career coaching and access to support services. We partner with organizations like Tent Partnership for Refugees and Welcome.US on this work.

Each year, these programs contribute to job retention, increase economic opportunity and mobility, and connect our company to the communities where we operate.



Gap Inc. was recognized by the American Opportunity Index in 2024 as one of the best places for high school graduates to start a career.

TOTAL JOBS FILLED BY OPPORTUNITY TALENT	FY 2024
In stores	2,280
In DCs	505
Across the company	2,785
In stores, cumulative since 2007	8,764
In DCs, cumulative since 2021	1,360
Across the company, cumulative since 2007	10,100+

Opportunity Programs

Continued

2024 PROGRESS

IN STORES

In 2024, Old Navy surpassed our 2025 goals to reach 20,000 youth and hire 5% of Old Navy entry-level store employees through This Way ONward.

These achievements have generated a positive and far-reaching impact. In 2024 alone, highlights include:

- 7,141 This Way ONward youth reached.
- Nearly 6,000 household members were estimated as benefiting financially from youth employment, and nearly 29,000 people were estimated as having better-quality relationships due to increased youth confidence and social skills.
- Nearly 20,000 Club youth reached through workforce readiness programs, engaging 330 Boys & Girls Clubs of America (BGCA).
- Old Navy celebrated 30 years²⁹ of partnership with BGCA and received BGCA's President's Award in recognition for its outstanding leadership in support of America's youth.

IN DCs

Since 2021, we have filled 1,360 jobs with opportunity talent in our DCs, building a healthy workforce that seeks to draw from untapped talent in local communities.

Following implementation of programming in support of English language learners (ELLs) in New York, performance during peak season has significantly improved for the DC, demonstrating business impacts.

Key progress in 2024 includes:

- 398 employees signed up to improve their English through EnGen, which was scaled to all our North American DCs. EnGen is a digital English upskilling platform providing custom Gap Inc. learning modules. 85% of participants surveyed demonstrated proficiency gains, and 83% reported an ability to navigate life better.
- An additional 116 employees were provided free onsite English language learning through partnerships with local community colleges at three DCs.
- 190 frontline leaders were trained to more effectively manage multilingual teams and 53 participated in language classes.
- Standardized the infrastructure and operations required to support a multilingual workforce by deploying a multilingual glossary of key Gap Inc. warehouse terms, a dial-in interpretation service, and English language learning modules for Merchandise Handlers. Three of our DCs now offer candidates the option to apply and interview in multiple languages.



²⁹ Boys & Girls Clubs of America



At Gap Inc., inclusion has been fundamental to how we do business since our founding in 1969. As part of our *Create for All, With All* commitment, our brands work to create inclusive and relevant products that foster a sense of belonging for our customers and our team members.

Fashion is a powerful medium of self-expression, and we partner with entrepreneurs and brands who share our values of optimism and inclusivity. Our 2024 brand collaborations are celebrations of creativity, originality, and community, advancing our efforts to champion inclusion through purposeful partnership.

Our collaboration with Madhappy celebrated optimism and connection, demonstrating how fashion can be a tool for self-expression and positivity. With Dôen, individuality took center stage with a collection that embraced authenticity. Originality reigned in the second year of our partnership with Dapper Dan, as we came together to elevate the iconic Gap brand hoodie underscoring the relationship between creativity, identity, and community.

Together with Harlem’s Fashion Row (HFR), we provided designers a platform to share their talent with the world and infuse new, fresh voices into the fashion industry. Since 2019, Gap brand has partnered with HFR to

support its mission through industry events, brand collaborations, and educational programs.

Creating a culture of inclusion and belonging is a shared responsibility at Gap, Inc., and by partnering with like-minded brands, we bridge gaps to create a better world where our customers and employees feel seen, heard, and valued.

Bridging the Inclusion Gap

Inclusion and Belonging

Inclusion has been integral to our business approach since we opened our doors in 1969. Our Inclusion & Belonging team works to embed inclusive practices into every aspect of our business.

GOAL PROGRESS AND DEVELOPMENT

While we made progress on our goals by expanding our pipeline of applicants and continuing to foster an inclusive culture, we have intentionally evolved and designed a new strategy focusing on the organizational and behavioral development required to create sustainable growth and impact.



OUR APPROACH

As we aspire to be a high-performing house of iconic American brands that shape culture, our Inclusion & Belonging strategy will empower us to cultivate environments where all people are celebrated for who they are and inspired to be their best. We are committed to embedding inclusion and belonging into every aspect of our business – ensuring our workforce is as inclusive as our customers and the communities we serve; we foster a culture where everyone feels valued, respected, and equipped with the tools and access they need to reach their full potential, and we leverage our ecosystem to be a force for good for our community partners.

We believe creating a culture of inclusion and belonging is everyone’s responsibility at Gap, Inc., and together, we bridge gaps to create a better world.

In 2024, we launched a new Inclusion & Belonging strategy rooted in the needs of our business, employees, customers, and communities. To enable our company to perform at a higher level, we anchor our commitments in three critical areas:

WORKPLACE

Foster a culture of inclusion where every employee feels valued, supported, and respected.

Pay Equity: We are committed to pay equity and continue annual internal pay equity assessment across markets to ensure our pay practices are fair and competitive.

Lead Inclusively: We develop leaders who can express, model, and promote inclusive behaviors. We empower them to build collaborative workplace communities that foster an inclusive and resilient team culture by providing the support needed for employees to thrive in a high-performance environment.

WORKFORCE

We are dedicated to ensuring that our workforce reflects a broad range of backgrounds, experiences, and perspectives to better serve our consumers and communities in every market.

Recruit Inclusively: Work to ensure our workforce is as inclusive as our customers and communities by recruiting individuals from a multitude of backgrounds, perspectives, and experiences.

Develop Our Talent: Build leadership pipelines and succession plans by ensuring we have fair and consistent talent practices.

MARKETPLACE

Embed inclusion and belonging into our business strategies, create sustainable value for our consumers, and bridge gaps for our community partners.

Create for All, With All: Support our brands in the creation of inclusive and relevant products and marketing campaigns for our customers.

Foster Community Belonging: Continuously utilize our ecosystem to positively impact our community partners while eliminating barriers to access for education, employment, and development opportunities.

2024 PROGRESS

WORKPLACE

Employee Resource Groups and Heritage Months: We leverage our [Employee Resource Groups](#) (ERGs), which are open to all employees, and heritage month activations to deepen social connections and strengthen a sense of community at hub locations for everyone. Examples include:

- API@Gap Inc. celebrated our community’s culinary traditions with the “Have You Eaten?” cookbook created with API@Gap Inc. members to highlight personal stories and family recipes.

- BLACK@Gap Inc. hosted a Coast-to-Coast Black History Month museum tour engaging employees across North America. Brandice Daniel, founder of Harlem Fashion Show, hosted Dapper Dan for an inspiring conversation about his profound impact on the fashion industry.
- HOLA@Gap Inc. and Banana Republic donated \$30,000 to community partner organization Acción Latina to build healthy and empowered Latinx communities in San Francisco through cultural arts, community media, and civic engagement. We held our third annual Tardeada (afternoon gathering) at Gap Inc. HQ, serving as an homage to the Latinx community through music, art, and food.
- PRIDE@Gap Inc. celebrated the return of the Denim Divas for a performance in our San Francisco HQ. Gap Inc. brands donated \$100,000 to support youth programming in partnership with The GenderCool Project.

WORKFORCE

Lower Eastside Girls Club and ENVSNFest: Gap Inc. continued our annual partnership with the [Lower Eastside Girls Club \(LESGC\)](#) with a \$50,000 donation to drive onsite programming and engagement with Black and Latinx youth. Banana Republic donated an incremental \$10,000 in celebration of International Women’s Day. We participated in the 2024 ENVSN Festival, a two-day conference for young women of color, designed to ignite the future of culture through professional and self development.

AfroTech: For the fourth consecutive year, Gap Inc. sponsored AfroTech, North America’s largest multicultural technology conference. Gap Inc. leaders hosted a technical talk on the summit stage, which celebrated the accomplishments of Black women in technology, and highlighted the fundamentals of technology in fashion.

MARKETPLACE

Old Navy

- Hosted activations at the Old Navy Field Leadership Conference to strengthen the sense of belonging, highlight the work and impact of our ERGs, and spotlight heritage month engagement. Leaders held a panel discussion to cultivate allyship, amplify the voices of our communities, and share ways to get involved.
- Released a Dapper Dan collection during Black History Month and hosted a fireside chat with Harlem’s Fashion Row.
- Created a collaboration with positivity-forward brand Madhappy and donated to the Madhappy Foundation to raise awareness, fund research, and positively impact the mental health movement globally.
- Hosted a civic engagement panel discussion featuring Brotherhood Sister Sol (BroSis) board member Damon T. Hewitt on the importance of civic engagement and how Gap brand can encourage young people to get involved. In honor of MLK Jr. Day, Gap brand and Gap Inc. donated \$100,000 and partnered with BroSis to improve opportunities for youth in the Harlem community and empower them with the resources, education, and mentorship they need to become leaders and advocates for change. We also held a back-to-school backpack drive, a job hiring event, participated in its Earth Day programming, and attended its annual Gala.
- Led the way for Gap Inc.’s Leading Inclusively workshops with pilots at the Key Business Leader meeting in the beginning of the year and the first facilitation to our General Manger population at the Gap Field Leadership Conference in July.

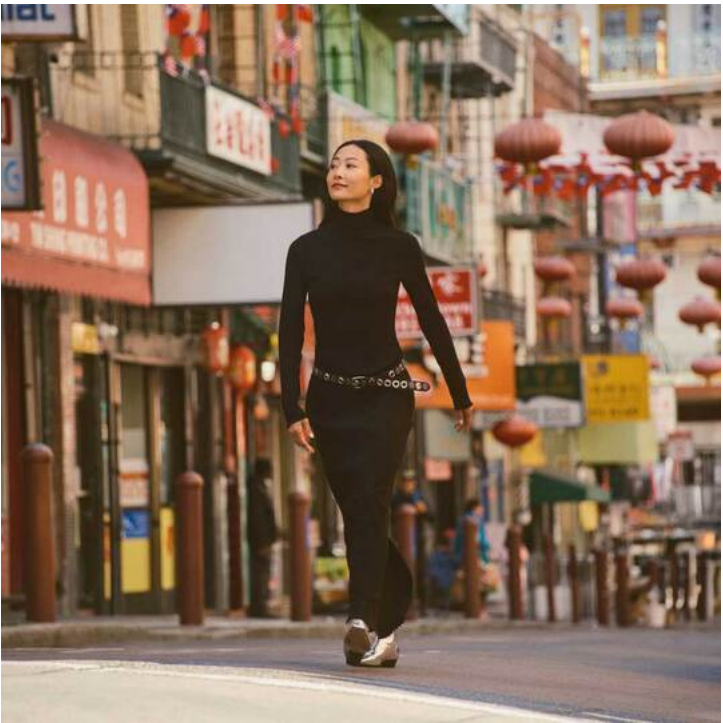
Gap

Banana Republic

- Hosted a dinner with NYC nonprofit, Welcome to Chinatown, and Banana Republic ambassador Lauren Chan to celebrate Asian and Pacific Islander (AAPI) Heritage Month. AAPI influencers, editors, and entrepreneurs spoke about the brand’s commitment to the organization and the needs of the Chinatown community. Banana Republic’s holiday campaign amplified the culture and contributions of San Francisco’s Chinatown through a series of curated content, including a city guide exploring Chinatown, a holiday hosting guide, and style spotlights from community members.
- Celebrated Pride Month with Native Son, whose mission is to empower Black gay and queer men, at Banana Republic’s Soho flagship store.

Athleta

- Participated in a Pride Walk during the Athleta Field Leadership Conference with The OUT Foundation, which removes obstacles for LGBTQ+ individuals in fitness, health, and wellness spaces.
- Welcomed community partner Lower Eastside Girls Club (LESGC) to an in-store styling session with a group of young girls who desire to work in fashion.



Human Capital Management

We prioritize people through our talent management practices that aim to foster a culture of inclusion and belonging, provide fair development opportunities, secure benefits, and promote health, safety, and well-being.

EQUAL OPPORTUNITIES AND PAY

We are an equal opportunity employer and recruit, hire, train, and promote qualified people of all backgrounds, regardless of status. We are committed to creating a workplace free from harassment and discrimination.

Equal Pay: Globally dollar-for-dollar, Gap Inc. pays women and men equal pay for equal work. In 2014, Gap Inc. was the first Fortune 500 company to announce equal pay for equal work, and, since then, we have conducted internal pay equality reviews using a leading third-party firm.

LEARNING AND DEVELOPMENT

We view every role as an investment toward capability development, whether it's on the store floor, in a DC, or at corporate headquarters. Employees learn essential skills to support our business and help ensure their careers are well positioned for the future.

Our learning and development programs include:

Retail Academy: Supports new hire onboarding and employee competency development through functional and technical training.

Rotational Management Program (RMP): Supports emerging talent in becoming future leaders across brand and product functions.

Leadership Development: Enables employees to lead themselves, their respective teams, and the business through enterprisewide leadership framework and trainings.

Year Up: Connects young adults with career opportunities and higher education by providing tools, experiences, and support to achieve their full potential.

Field Onboarding: Delivers an enhanced onboarding experience for field employees to create a sense of belonging and improve time to productivity.

Inclusion and Belonging Training: Equips people leaders to create inclusive, psychologically safe environments for all with a focus on building values-based leadership behaviors and a growth mindset.



85% of employees who participated in our 2024 census survey are engaged, demonstrating satisfaction by answering “Agree” or “Strongly Agree” to the question “I am happy working at Gap Inc.”

6.8 average hours of mandatory compliance training and development were delivered per full-time employee in fiscal 2024.

EMPLOYEE PERFORMANCE AND SATISFACTION

Our performance management process is designed to build a high-performance culture, foster a growth mindset, and unlock individual potential. Our performance management practices help meet corporate priorities, reward employees for performance, model our values-based leadership behaviors, and create transparency in our employee expectations.

Employees set annual performance goals that align with company priorities and individual and team objectives. Formal mid-year and year-end performance conversations provide opportunities for employees and people leaders to evaluate performance, discuss development, and cultivate a culture of continuous feedback.

Our Year-End Performance and Rewards Process differentiates rewards based on performance, supporting our pay-for-performance philosophy.

We use an annual feedback survey to understand employee sentiment, reaching out to all employees each year, with a 76% completion rate goal across the enterprise in 2024.

Shifting From Seasonal to Sustainable

This year, across Gap Inc.’s DCs, over 700 seasonal employees transitioned into full-time roles as merchandise handlers – the result of our year-round investment in core staff.

This continuity strengthens teams, enhances customer service, fosters a sense of belonging, and deepens connections between employees and brands.

An increased focus on retention and training offers a career path and a sense of purpose, in addition to increased hours and compensation.

Across Gap Inc., we’ve seen how sustainable retail careers can unlock potential. Take Kevin Kuntz, our SVP of Global Logistics, who started as an hourly employee at 17 and worked his way up to lead our network of DCs employing more than 9,000 people. His journey reflects what’s possible when companies invest in their people.

“When I started at Gap Inc. as a seasonal employee, I thought it would be temporary. But I was eager to learn, and the company gave me opportunities to grow. I had great mentors who stoked my curiosity and embodied our company values and what it meant to be a great leader. More than 30 years later, I wouldn’t change that choice for the world,” said Kevin Kuntz, SVP of Global Logistics.

Stories like his show that retail can be a springboard for long-term success and that there is potential in every role.

– Amy Thompson, Chief People Officer

Read More: [Fortune](#)

Human Capital Management

Continued

BENEFITS AND WORK-LIFE INTEGRATION

Our comprehensive benefits programs help employees make the most of their professional and personal lives, offering competitive, modern, and relevant health and financial well-being benefits to attract and retain talent. We make substantial efforts to communicate and engage all employees on these benefits through multiple campaigns during the year, including those targeting our store, DC, and part-time employees.

FINANCIAL WELL-BEING

GapShare 401(k) Retirement Plan (U.S.): We help employees build financial security by matching employee contributions up to 4% of base pay, with 100% immediate vesting for full-time employees and those meeting minimum service hours. For part-time employees who do not meet minimum service hours, we offer the option to contribute on day one of employment. Non-U.S. employees have access to local market relevant retirement benefits.

Employee Stock Purchase Plan (ESPP): We offer all U.S. and Canada employees to purchase Gap Inc. stock at a 15% discount quarterly.

Employee Merchandise Discount Program: We offer employees up to 50% off regular-priced merchandise in our stores globally and online (in the U.S. and Canada).

Education: We offer tuition reimbursement, discounted tuition courses, and tuition-free higher-education options for full-time employees, and student loan refinancing resources to employees in the U.S. and Canada.

Commuter Benefits: U.S. employees can save on eligible commuting costs through automatic, pre-tax payroll deductions.

Ayco Digital Financial Consulting Platform: Enables U.S. full- and part-time employees to assess their financial health and take full control of their finances. Many non-U.S. employees have financial counseling support through comparable local resources or retirement plans.

Weekly Pay: Most U.S. Store and DC employees are paid weekly to allow quicker access to pay and to provide flexibility to employees for managing their finances.

Financial Risk Protection: We offer all U.S. full-time employees company-paid life and disability insurance. Part-time and seasonal employees can access free life insurance and purchase additional protection coverage lines through Avibra. Non-U.S. employees have market-relevant risk protection benefits in their geographies.

Legal Service Plan: U.S. full-time employees are eligible to pay a nominal fee per paycheck to receive unlimited access to a network of attorneys for legal counsel. Part-time employees have access to comparable legal support services through Avibra for a nominal fee as well. General free legal support through our Global Employee Assistance Programs (EAPs) is also offered.

HEALTH AND WELL-BEING

We offer U.S. full-time employees comprehensive medical, dental, and vision coverage. Part-time employees have access to Stride Health, which provides consultation on securing coverage through healthcare exchanges. Non-U.S. employees are offered company-provided medical coverage if relevant by market or geography.

Free mental health therapy sessions, along with other resources, are available via our Lyra Mental Health and EAP for all U.S. employees. Non-U.S. employees have access to comparable programs in certain countries.

The fertility/family planning education platform Inflection is available to U.S. employees. Inflection also provides menopause support and education. Those who participate in our medical plan also have access to advanced fertility medical treatment care in the U.S. and Canada.

We offer free online digital fitness, meditation, and well-being classes to all global employees.

LEAVE AND FLEXIBLE WORK

Paid Time Off (PTO): In the U.S., we provide PTO, including sick and personal holiday days, which increases with seniority, up to 30 days for full-time employees. Director-level and higher employees are provided “as needed” PTO.

Parental Leave: U.S. employees have 12 weeks paid parental leave.³⁰ This is available to full-time employees after six months of service and to part-time employees who have worked at least 24 hours a week for the six months prior to parental leave. Full-time employees who may not qualify for paid parental leave are still offered leave on a non-paid but job-protected basis. This is in addition to our job-protected pregnancy disability

leave, which can be six weeks or more, available to both full-time and part-time employees. Full-time employees are paid during pregnancy disability leave through our risk protection benefits.

Time away and comparable protected leaves are offered to all non-U.S. employees on a market-relevant basis.

Adoption/Surrogacy Assistance Reimbursement Plan: Gap Inc. provides financial support for costs associated with public, private, or international adoptions of children under 18 years of age, or if building a family via a surrogate for full-time employees in the U.S. and Canada.

Phase In/Phase Out: Eligible employees can temporarily reduce work hours before, during, or after parental or family leave of absence.

Caregiver Assistance: U.S. full- and part-time employees have online access to child-, elder-, and pet-care resources, and benefit from back-up child and elder care and priority access to nationwide child-care centers. We offer easy access to care providers through Bright Horizons, with the opportunity for full-time employees to enroll in a Dependent (Day) Care Flexible Spending Account to save tax-free dollars to pay for child or adult dependents.

Scheduling and Wages: We offer competitive wages reflective of each local labor market and comply with all pay transparency laws, requiring the disclosure of pay ranges and benefits to employees. We benchmark and adjust pay ranges annually to support competitiveness and review pay equity internally, periodically validating our results with an external consultant. We have taken steps to improve scheduling practices, including eliminating on-call scheduling and providing employees with 10–14 days’ notice for their schedules.

Learn more: [Gap Inc. Benefits](#)

OCCUPATIONAL HEALTH AND SAFETY

We operate in line with national- and state-level OSHA standards and are committed to implementing sound engineering controls, and preventing and promptly addressing injuries, using an integrated approach:

Hazard Identification, Prevention, and Awareness: We include safety criteria in the design and layout of our stores and warehouses, as well as in contracts to limit risk and liabilities associated with vendor and contractor services and projects. We train employees on safe work practices through on-the-job training programs.

Assessments and Audits: Dedicated teams analyze risks, collaborating with operational leaders to adjust business practices in line with emerging incident trends. Our Internal Audit department completes reviews of specific scope areas for DCs and stores to gauge procedural compliance and solicit feedback from business partners. We also use third-party firms to perform assessments and survey our DCs, corporate offices, and data centers.

Incident Response and Oversight: Leaders and associates are accountable for following our incident investigation and reporting processes. All reported information is analyzed centrally to assess risks and develop preventive measures.

³⁰ Six weeks at 100% pay and six weeks at 50% pay.

Employee Engagement and Corporate Giving

Through employee engagement, volunteering, donations, and meaningful strategic partnerships, we bridge gaps in our own communities while also connecting our employees as a Gap Inc. community.



Investing in the Place We Call Home

From our humble beginnings as a single storefront in 1969 to our expansive \$15.1 billion global presence in net sales in fiscal 2024, San Francisco has always been our home. The pandemic and economic downturn prompted us to revitalize the city. In partnership with the nonprofit Nest, we are investing in the local creative community to help it thrive.

By empowering local artisans and supporting our employees, we reinforce our purpose of bridging gaps to create a better world. “San Francisco is not just the birthplace of Gap Inc. – it’s woven into the fabric of our culture and brands,” said Amy Thompson, Gap Inc.’s Chief People Officer. “When we champion San Francisco’s creative community, the benefits manifest both inside and outside of our walls.”

OUR APPROACH

EMPLOYEE ENGAGEMENT

We aim to bring positive change to global communities through company-, brand-, and employee-led engagement activities including:

Community Leader Program: From companywide initiatives to teaming up with local organizations, community leaders help organize volunteer and engagement events with their team, store, or region.

Volunteering: Employees can devote time to causes they care about by volunteering for five paid hours per month.

Field Team Grants: When a store or DC team volunteers 25 hours to support an eligible community organization, they can request a \$250 grant to further support the organization.

Money for Time: For every 15 hours an employee volunteers for an eligible nonprofit in a calendar year, Gap Inc. will make a \$150 donation to the nonprofit upon employee request.

CORPORATE GIVING

We aim to drive meaningful change on large-scale social issues by investing in and collaborating with stakeholders. Our approach is brought to life by our employee engagement program and strategic partnerships that allow us to give back through:

In-Kind Donations: We increase circularity and maximize the value of our products by donating excess inventory.

Donation Matches: We match donations dollar for dollar, up to \$1,000 for part-time employees and \$15,000 for full-time employees per calendar year.

Board Service Grants: We contribute funding to eligible nonprofits where eligible employee leaders provide their service as board members.

2024 PROGRESS

This year, we reaffirmed our commitment to volunteerism in our home city of San Francisco and across the communities where we live and work.

- Over 40,000 employees volunteered in 2024 as part of the San Francisco Downtown Volunteer Coalition, annual Volunteer Rally, Doris Fisher Day of Service to celebrate the company’s 55th anniversary, and meal distribution with GLIDE Foundation’s Daily Free Meals Program.
- Gap Inc. donated approximately \$2 million to more than 3,100 organizations worldwide as a result of employee engagement activations including volunteer matching from Field Team Grants and Money for Time, the annual 1.2-mile Walk for Water in support of WaterAid, holiday grants and gift donations from Gap Inc. Gives, and Community Leader Appreciation Day.³¹

Additional highlights include:

San Francisco Revitalization: We joined the Downtown Volunteer Coalition in San Francisco as part of a collaborative effort with other leading organizations to support a more vibrant city.

Disaster Response: Approximately \$61,000 was distributed to employees affected by Hurricanes Helene and Milton, and the Southern California wildfires through the Selvage Fund, our disaster relief fund created to support Gap Inc. employees in times of need.

Gap Foundation: Donated \$350,000 to the American Red Cross, Los Angeles Fire Department, and Direct Relief to support disaster recovery from hurricanes in the southeast and wildfires in Greater Los Angeles.

In addition, Gap Inc. brought a number of stores in the Los Angeles area online in the immediate aftermath of the wildfires in Greater Los Angeles, serving as disaster response hubs to the local community.

MEASURING EMPLOYEE ENGAGEMENT AND CORPORATE GIVING	FY 2024
Percent of employees who volunteered	49%
Number of hours volunteered	274,000+
In-kind donation units	400,000+
In-kind donation value	\$5 million
Pounds of food donated to San Francisco food banks from headquarters	3,100
Gap Inc. cash donation value	\$8 million
Gap Foundation giving value	\$1.2 million

³¹ United States team grants are paid by Gap Foundation, all other employee engagement donations are paid by Gap Inc.

Governance

Through strong corporate governance, we aim to ensure we operate ethically and comply with laws and regulations while meeting stakeholder expectations to protect both people and the planet.

- Supplier Compliance
- Management Oversight
- Risk Management
- Stakeholder and Political Engagement
- Business Ethics and Integrity



Supplier Compliance

We collaborate with our suppliers to operate responsibly and ethically across our value chain.

GOALS BY 2025	PROGRESS
100% of our in-scope Tier 1 facilities will participate in industrywide efforts by 2023, including SLCP and/or ILO-IFC Better Work, and 100% of Tier 2 strategic mills will participate by 2025	100% of in-scope Tier 1 facilities are participating 82% of Tier 2 strategic mills are participating
80% of Gap Inc. sourcing will be allocated to green-rated factories	83% of our business spend was allocated to green-rated factories
100% of vendors comprising 90% of Gap Inc.’s business spend are invited to participate in Better Buying, with scores isolated across brands, working toward annual public reporting on purchasing practices improvements	100% of vendors comprising 90% of our business spend have been invited to participate in Better Buying, and we continue working toward sharing updates on purchasing practices improvements

OUR APPROACH

Our Vendor Compliance program, previously called supplier sustainability, aims to enhance traceability and collaboration with supply chain partners. We monitor and improve social and environmental performance through rigorous assessments, remediation, vendor scorecards, and responsible purchasing practices.

Code of Vendor Conduct (COVC): Implemented in 1996 and updated regularly to reflect evolving international and local regulations, adherence to our [Code of Vendor Conduct](#) is required of all factories that produce goods for Gap Inc., as agreed upon in their Vendor Compliance Agreement.

The COVC outlines our expectation for factories to comply with our [Human Rights Policy](#) and complete the Higg FEM annually. Our policies are based on the principles outlined in the Universal Declaration of Human Rights (UDHR), United Nations Global Compact (UNGC), Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the International Labour Organization’s (ILO) Core Conventions.

Assessment and Remediation: Our Assessment Manual outlines the protocols we use to assess and remediate labor and working condition issues.

- We conduct three types of assessments for all factories: 1) initial assessments to approve supplier activation, 2) annual full assessments of compliance with our COVC, and 3) follow-up assessments to monitor progress against corrective action plans. We also partner with the third parties Social & Labor Convergence Program (SLCP) and ILO-IFC Better Work to conduct assessments.
- Factories receive an assessment score, which incorporates the number and severity of issues found. The score is color-coded: green (86–100 points) for maintaining a high level of social and environmental performance, yellow (65–85 points) for requiring improvements,



- and red (0–64 points) for requiring immediate attention. Our approval process prevents factories that receive a red rating on their initial assessment from entering our sourcing base.
- In the case of violations, we follow a structured remediation process to perform investigations, due diligence, and root cause analyses by working with the complainant(s), the factory and vendor, local and international stakeholder groups, and other brands sourcing from the same factory. Corrective action plans are developed to address findings, eliminate root causes, and assign accountability with clear deadlines for each action. Our timeline for corrective action is within 60 days of identification, while long-term prevention plans are developed within a maximum of 120 days. To close a corrective action plan, resolutions must meet COVC and Human Rights Policy expectations.
- For cases of ongoing and persistent egregious noncompliance, we implement a consequence model that may ultimately result in a vendor exit plan. Throughout the deactivation process, we diligently monitor the factory to help ensure that all outstanding issues are resolved.

- Additionally, our Workforce Engagement Program opens communication channels for workers to confidentially report grievances to facility management via surveys, interviews, and messaging applications. This program aims to improve worker-management relationships and drive facility improvements.

Vendor Scorecards: We incentivize suppliers to implement proper labor, health and safety, and environmental standards in their facilities by incorporating our supplier assessment ratings into our vendor scorecard, which helps inform business decisions. The Sourcing team uses scorecards to assess supplier performance, identify improvement areas, and foster accountability through regular reviews. We support vendors in making necessary changes and use the scorecards as an incentive and penalty mechanism, driving continuous improvement.

Purchasing Practices: We participate in Better Buying, an initiative that promotes responsible labor practices and the protection of human rights in the supply chain, reflecting our ongoing efforts to promote supply chain transparency and fair labor practices. We encourage our vendors to participate in Better Buying, as their inputs and feedback are critical to helping us improve our sourcing practices.

2024 PROGRESS

In 2024, we expanded the reach of our Vendor Compliance program and developed a policy to increase oversight and governance of tiers upstream in our supply chain.

Mill Compliance Agreement: We launched our Mill Compliance Agreement with the aim to increase upstream visibility to help ensure compliance with global regulatory requirements and human rights policies. By increasing transparency and traceability into our Tier 2 suppliers, the initiative mitigates facility noncompliance.

Assessment and Remediation: 11% of our supplier assessments were conducted by Gap Inc., 41% by ILO-IFC Better Work, 45% through SLCP, and 3% through other third parties.

At the end of 2024, 78% of Gap Inc.-approved facilities were rated green, 20% yellow, and 2% red. 83% of our business spend was allocated to green-rated factories, surpassing our target of sourcing a minimum of 80% from green-rated suppliers by 2025.

For a summary of the issues found in our factories from the past three years of COVC audits, please see our [Code of Vendor Conduct Findings](#).

Institute of Public & Environmental Affairs (IPE): The IPE’s platform allows us to monitor pollution data from suppliers in China and facilitate corrective action with suppliers in the case of violations. As of the end of 2024, 91 Tier 1 and 43 Tier 2 suppliers were registered to the IPE platform for monitoring.

UNDERSTANDING OUR SUPPLY CHAIN

Improving supplier performance begins with identifying and locating our suppliers and learning about their capabilities and challenges.



TRACEABILITY

We publish our Tier 1 factory list twice a year and are improving visibility into Tier 2 and beyond.

Open Supply Hub: [Gap Inc. profile](#)



COLLABORATION

- Tier 1 and 2 suppliers
- Industry partners
- Innovation and technology partners
- NGOs

RATING OUR SUPPLIERS

We calculate a Compliance and Sustainability score for each facility as part of our Tier 1 vendor scorecards, which have a rating system of red, yellow, or green (most favorable). We assess suppliers for social and environmental compliance using a variety of methods.



COMPLIANCE AND SUSTAINABILITY SCORE COMPONENTS

Social

SLCP, ILO Better Work, and Gap Inc. COVC audits

P.A.C.E./RISE participation and percentage of female beneficiaries

Environmental

Higg FEM

ENCOURAGING ACTION

We aim to support worker well-being, respect human rights, reduce environmental impacts, and help our suppliers find efficiencies with streamlined industry tools and processes.



REMEDIATION PRACTICES

Collaborate with all stakeholders to develop corrective action plans.



PURCHASING PRACTICES

Goal: At least 80% of Gap Inc.’s business spend is from green-rated factories by the end of 2025.



Factory Programs

Supplier engagement programs further support supplier capacity building toward more positive working conditions and environmental impacts that go beyond basic compliance.

Learn More: [Climate Action](#), [Water Stewardship](#), [Factory Programs](#)

Management Oversight

We hold ourselves accountable for environmental and social issues in our business operations and supply chain with a strong governance structure.

OUR APPROACH

As environmental and social stewards, we diligently monitor company activities. Effective governance helps ensure that sustainability initiatives are embedded in our business practices. We maintain a clear management approach to our environmental and social activities, and our operational scope offers opportunities for scaled impact.

Business Integration: The Global Sustainability team, part of Gap Inc.’s Supply Chain and Transformation department, maximizes cross-departmental collaboration to meet current and future consumer and industry demands. We integrate sustainability goals into revenue-driving business functions including Sourcing, Transportation, and Brand teams. Together, teams monitor fiber conversion to more sustainable sources, enable social and environmental factory programs, and validate sustainability product claims. We consider financial risks and opportunities related to environmental and social initiatives as part of the company’s planning and risk management process.

Oversight Structure: Each of our three Board committees (Governance and Sustainability; Compensation and Management Development; and Audit and Finance) oversee relevant topics. Regular updates and developments are provided to the Board and its committees by the Chief Supply Chain and Transformation Officer, Chief Legal and Compliance Officer, and other senior leaders.³²

The Governance and Sustainability Committee is responsible for overseeing climate, water, product sustainability, circularity and waste, and human rights. This committee monitors each topic’s strategy, progress toward goals, risks, and opportunities, and shares relevant updates with the full Board of Directors as needed. Specifically, the committee ensures progress against the company’s science-based targets (SBTs) for climate, oversees the water strategy and related goals, and manages the product sustainability strategy.

The Audit and Finance Committee is responsible for overseeing the company’s compliance program. Meanwhile, the Board of Directors’ Compensation and Management Development Committee focuses on human capital management, including the inclusion and belonging strategy. The Chief Inclusion and

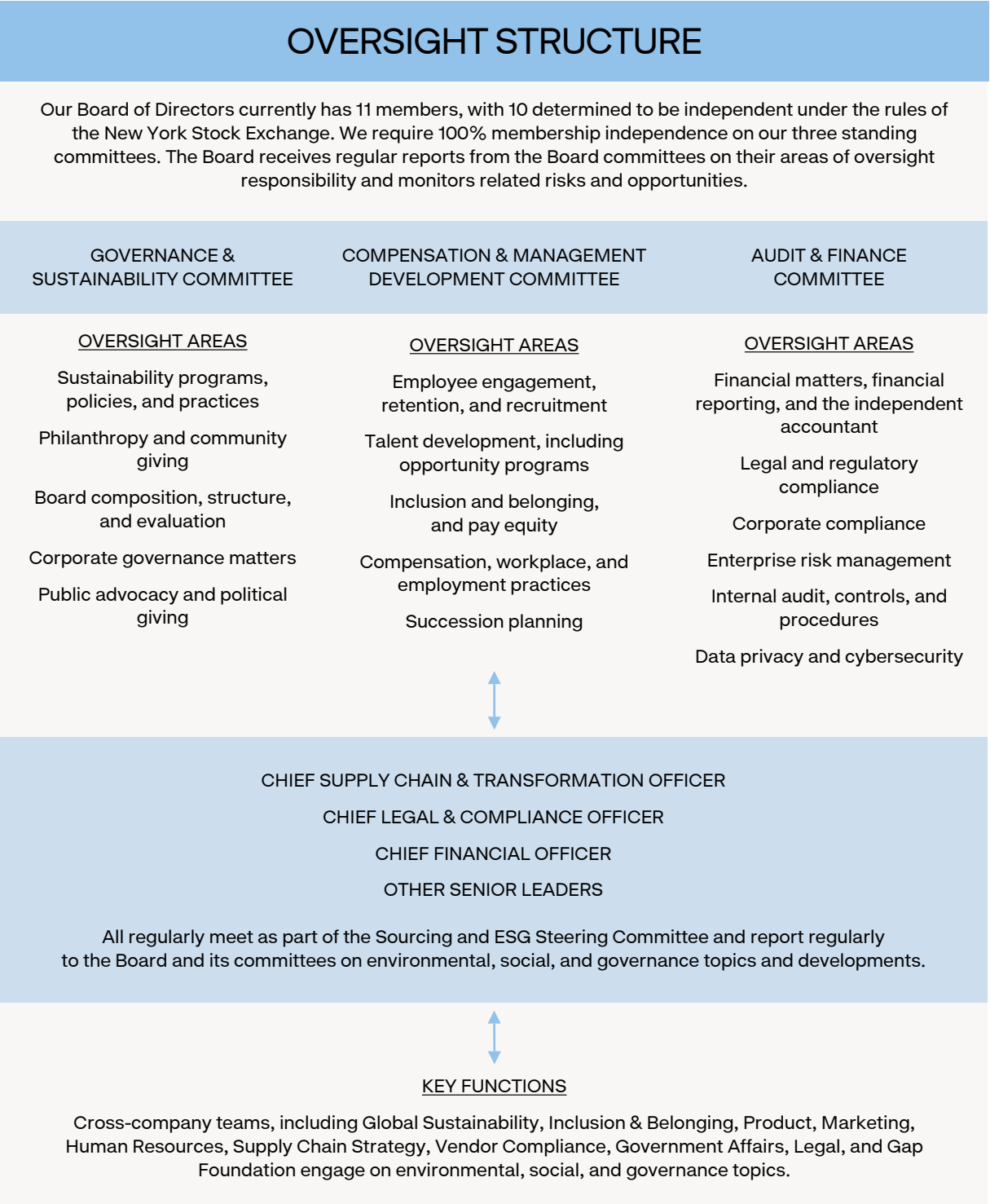
Belonging Officer regularly reports to the Board on the progress, risks, opportunities, and programs related to inclusion and belonging.

Goals and Progress Measurement: We have set ambitious goals and interim targets across environmental and social issues through 2050. Our ESG Reporting team works cross-functionally on data governance, building strong control environments to help ensure data integrity. They track Gap Inc. key performance indicators to confirm work is on track and provide quarterly updates to business functions. We also report in line with the Science Based Targets Network (SBTN), Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB), UN Guiding Principles on Business and Human Rights, Paris Agreement on climate change, and Task Force on Climate-related Financial Disclosures (TCFD).

Partnerships: We support more sustainable, industrywide solutions and greater equality by partnering with local and global organizations. Partnerships are key to how we scale collective impact throughout our business, industry, and beyond.

2024 PROGRESS

This year, we continued to further align our governance practices with increased regulations and existing commitments. We regularly convened a Sourcing and ESG Steering Committee composed of our Senior Leadership team to oversee key aspects of our performance and mitigate related risks. By regularly reviewing our practices and performance, the committees work to help ensure that we remain compliant with applicable laws and regulations, proactively address potential challenges, ensure responsible sourcing practices, and uphold our commitment to sustainability.



³² The Chief Legal and Compliance Officer regularly reports to the Audit and Finance Committee of Gap Inc.’s Board of Directors on the effectiveness of the company’s corporate compliance program.

Risk Management

Annually, we identify and assess existing and emerging risks that have the greatest potential to impact company operations and our ability to achieve our objectives.

OUR APPROACH

Enterprise Level: The Risk Committee, currently comprising the full Senior Leadership team, oversees an annual enterprise risk assessment (ERA), facilitated by our Internal Audit team.

The ERA results are presented to the Board to facilitate discussion of high-risk areas and provide the foundation for the annual Internal Audit plan, management’s ongoing monitoring and risk mitigation efforts, and Board-level oversight. The Risk Committee meets quarterly throughout the year to review ERM mitigation plans and progress, as well as selected risks and critical risk events. The company also has a Risk Steering Committee that meets monthly and sets the agendas for the Risk Committee meetings.

On a quarterly basis, our Chief Audit Executive updates the Audit and Finance Committee on the Internal Audit plan. The Audit and Finance Committee also reviews updates to the company’s enterprise risk profile throughout the year.

Climate- and sustainability-related risks are considered as part of the ERA process. Our Board of Directors and senior leaders across the company monitor climate- and sustainability-related risks and opportunities.

Physical Asset Level: Our Global Resilience team analyzes, prioritizes, and helps mitigate physical

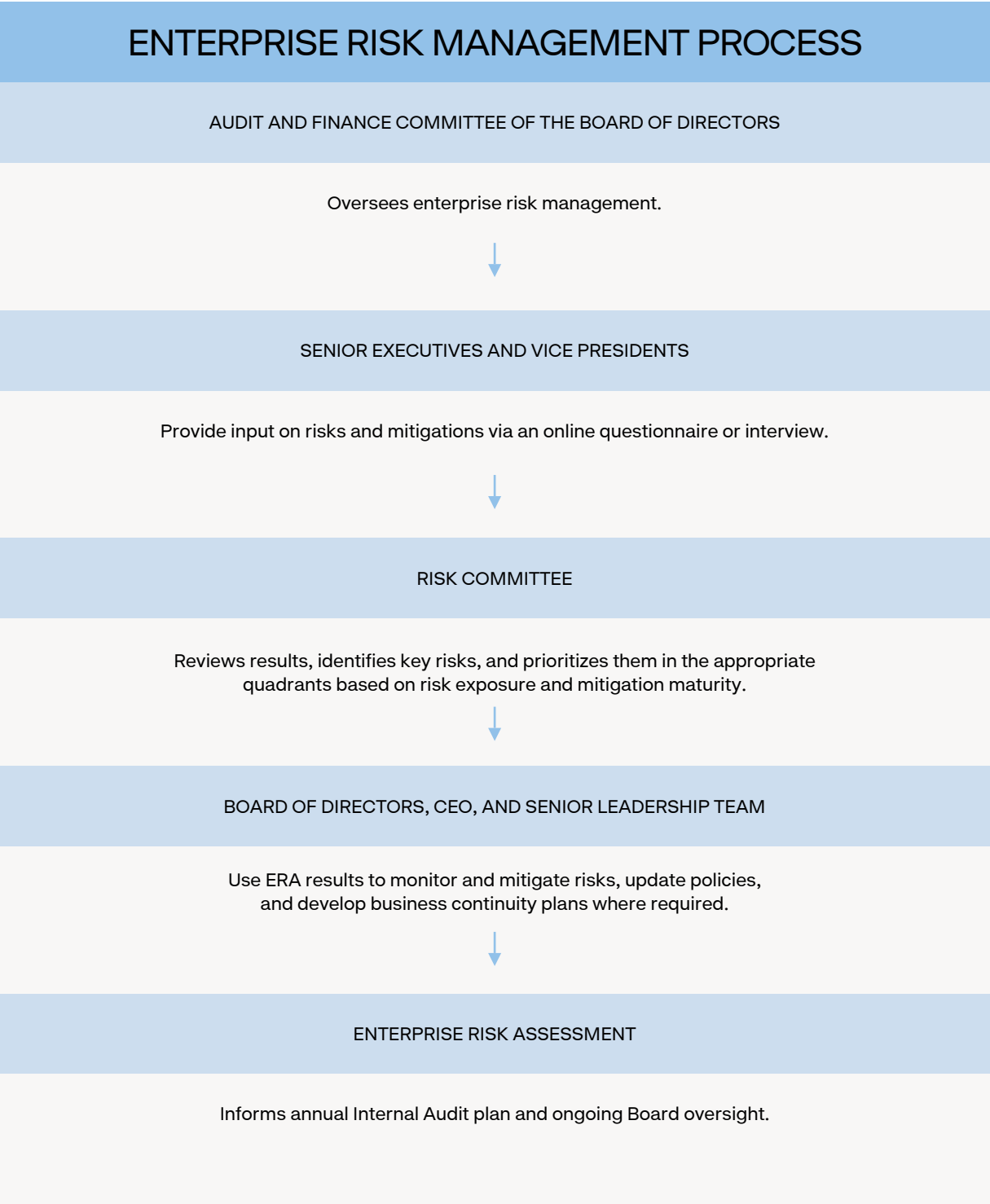
risks resulting from extreme weather, natural hazards, and other external events to protect company-operated sites. We use predictive and actual models from national and international agencies such as the U.S. National Oceanic and Atmospheric Administration to track potential and actual impacts. This information is used to determine the event, company risk, and residual risk remaining after preparedness plans are developed.

2024 PROGRESS

We conducted the company’s second climate scenario analysis to better understand the impact of physical and transition risks related to climate change. The results identified water scarcity, riverine flooding, and extreme temperatures as the primary physical risks impacting our value chain. We are using these findings to pinpoint priority regions for intervention and develop a multifaceted approach to mitigate future impacts and build resilience with our suppliers.

We use the WWF Water Risk Filter to assess our sourcing from water-stressed regions and focus our water replenishment efforts. In 2024, we piloted setting contextual water targets with three suppliers in high-risk basins. The pilots drew on data regarding local watershed stress to reduce water use and mitigate risks from water scarcity.

Learn more: [Business Ethics and Integrity](#), [Climate Action](#), [Water Stewardship](#)



Stakeholder and Political Engagement

Stakeholder engagement and partnerships are critical to our strategy and materiality assessments, and help maximize the positive impact of our programs.

OUR APPROACH

We regularly engage stakeholders to understand the issues that affect them, our industry, and society. The frequency of our stakeholder engagement is based on their connection to our business, our ability to impact them, and the salience of the issue being addressed. Dialogue helps us improve our strategies, set goals, focus action, and scale up industry solutions.

To capture feedback, respond accordingly, and drive improvements across our business, we:

- Convene industry and stakeholder partners to discuss systemic issues that require collaboration.
- Implement formal and informal consultations with expert organizations on material issues.

- Contribute our voice to policy issues through government engagement.

Our stakeholder engagements include, but are not limited to:

Investors: We host quarterly [earnings calls](#) to engage with investment firm analysts, offering public question and answer sessions with our Chief Executive Officer and Chief Financial Officer.

Our Employees: We use an annual feedback survey to understand employee sentiment, and our Human Resources team offers many engagement opportunities for employees, including our Code of Business Conduct Hotline.

Learn More: [Human Capital Management](#), [Business Ethics and Integrity](#)

Supply Chain Human Rights: We are dedicated to upholding the rights of supply chain workers, following the ILO Core Conventions.

Our [Human Rights](#) team actively engages in ongoing discussions with international labor and human rights organizations, and expects our business partners and suppliers to share our values. Our [Vendor Compliance](#) team gathers insights to understand factory employment practices and working conditions. We assess our Tier 1 suppliers through evaluations, training, and surveys, with input from workers and their representatives. One method of engagement includes supplier completion of the Better Buying survey.

Worker Communications: We routinely engage Tier 1 supply chain workers through interviews to learn about [human rights issues](#) and develop or improve our [factory programs](#).

NGOs and Trade Unions: We regularly engage NGOs and trade unions in the countries from which we source, particularly when labor-related factory issues are identified. Engagements with global groups help us further improve our labor and human rights efforts.

Industry Initiatives: We participate in initiatives like the American Apparel & Footwear Association (AAFA) Social Responsibility Committee and the Retail Industry Leaders Association (RILA) ESG Committee, which convene brands to scale and amplify collective efforts related to human rights and environmental impacts.

Consumer Insights: We conduct a 10-minute quantitative online survey with shoppers from the Gap Inc. Insiders community at least once annually. Through it, we ask how the social and environmental practices of fashion brands influence customer mindsets, as well as how customers perceive our brands are doing in these areas.

Political Engagement: We participate in political and regulatory processes on issues that affect our business and community interests, working

proactively to enable our strategies through public policy, government, and legislative advocacy – in line with our values, legal obligations, and Code of Business Conduct and Code of Vendor Conduct. We take positions on ballot measures, initiatives, or propositions only when they have a direct impact on our business.

2024 PROGRESS

Supplier Summit: We hosted a [supplier summit](#) for our top 100 vendors (including apparel manufacturers and technology and logistics partners) to learn about our company’s priorities and meet CEO Richard Dickson. This summit was our first since the COVID-19 pandemic.

We are focused on improving our supply chain and leveraging close partnerships that boost network resilience, data transparency, and sustainability.

Business Roundtable: In June and December 2024, CEO Richard Dickson met with members of the U.S. Congress and the Business Roundtable in Washington, D.C., about pressing issues that impact American businesses and how Gap Inc. is working to bridge the opportunity and equity gaps that persist in our society.

International Advocacy: In November 2024, we participated in a multi-stakeholder delegation with other brands, government representatives, and labor stakeholders to Bangladesh to express our support for advancing worker protections and a continued sourcing commitment. In December 2024, we participated in a brand delegation to Taiwan to discuss improved protections for foreign contract workers with national industry and government leaders.

Impact Employer Summit: As part of our efforts to share learnings from our opportunity programs, in collaboration with Jobs for the Future (JFF), Old Navy’s Head of Stores and Store Operations joined a thought leadership discussion on creating economic opportunity in today’s labor market at the Impact Employer Summit in Washington, D.C.

Congressional Baseball Game: Gap Inc. was once again a sponsor of the annual [Congressional Baseball Game](#) in Washington, D.C. Since 1909, the game has become an annual bipartisan tradition in which Democrat and Republican Members of Congress face off in a friendly exhibition to raise money for local Washington, D.C., charities, including the Boys & Girls Clubs of America, a key partner of Old Navy’s This Way ONward opportunity program. The game this year raised a record-breaking \$2.2 million.³³

Florida Law Enforcement Officer of the Year: In November 2024, Gap Inc. supported the Florida Retail Federation’s 50th Annual Law Enforcement Officer of the Year Awards. To show our appreciation for the law enforcement officers who ensure the safety of our stores, employees, and customers, Gap Inc. provided awardees with in-kind donations of apparel. These donations symbolize our gratitude for their unwavering commitment to maintaining a secure and welcoming environment for all in our stores.

Southern California Backpack Giveaways: Gap Inc. proudly supported two impactful backpack giveaway events, hosted by state Assembly member Tina McKinnor and state Senator Steven Bradford, both of whom represent our Inglewood stores. Both events distributed free backpacks, essential back-to-school resources, and health services to children and families in the local community.

³³ Sports and Fitness Industry Association

Business Ethics and Integrity

Our corporate compliance program is designed to help employees and our Board of Directors meet legal requirements while operating responsibly, ethically, and with integrity.

CODE OF BUSINESS CONDUCT

Since 1998, our [Code of Business Conduct](#) (COBC) has been the foundation of our corporate compliance program. The COBC sets the policies and principles that all Gap Inc. employees and directors are expected to follow. We conduct COBC Assessments to understand the impact of the COBC program.

All employees worldwide receive access to the COBC when they join the company, agree in writing to comply with it, and are required to complete a related training course. Depending on their location, level, and role, employees may be required to do additional training on issues such as sexual harassment, Zero Means Zero non-discrimination, wage and hour compliance, workplace accommodations, anti-corruption, and data privacy and security.

Employees are encouraged to raise concerns with their manager, next-level manager, local human resources, or our Global Integrity team. Our confidential, [24/7 COBC Hotline](#) is managed by an independent third-party vendor and is available to

anyone who conducts business with or is an employee of Gap Inc. All reporters have the option to remain anonymous.

Our investigative teams log, process, and address complaints in our web-based reporting system, which are also reviewed by our Global Integrity and Internal Audit teams. Individuals who report suspected COBC violations are protected by the company’s strictly enforced zero tolerance for retaliation policy.

The Audit and Finance Committee has oversight responsibility for the corporate compliance program and receives regular updates from the Chief Legal and Compliance Officer. The Global Integrity and Compliance team is committed to continually improving the program in line with legal and regulatory requirements, U.S. Department of Justice guidelines, corporate ethics best practices, and our own ambitious standards.

Learn more: [Corporate Compliance](#)

ANTI-CORRUPTION AND BRIBERY

As a publicly traded company, we uphold rigorous anti-corruption policies and associated procedures, such as our global anti-corruption policy and our Anti-Corruption Due Diligence (ACDD) process. These measures support compliance with the U.S. Foreign Corrupt Practices Act and local anti-bribery laws.

We have the following processes to promote compliance:

- A companywide compliance system is utilized to monitor and address anti-corruption risks and enforce our anti-corruption and anti-bribery policies.
- Anti-corruption training is delivered to global directors and above, as well as to managers in high-risk functions. Additional anti-corruption training is delivered as needed.

We leverage our COBC Assessments to evaluate the effectiveness of the anti-corruption program, use the ACDD process in high-risk markets, and require that an ACDD report be run on all third-party distributors and all third parties who interact with government officials on our behalf, and/or third-party distributors.

COMPETITION AND ANTITRUST LAWS

Many of the countries we operate in have competition (antitrust) laws. These laws reinforce our own standards – everyone needs to be able to compete fairly in a free market. To prevent misconduct, employees and directors are required to comply with our internal Competition Law Policy and local laws. Any employee who violates this policy may be subject to disciplinary action, up to and including termination, significant monetary damages or fines, and even legal action.

DATA PRIVACY

We are committed to informing and empowering our customers and employees to have meaningful control over how their personal information is collected and used. Our privacy practices are guided by well-established principles: fairness and transparency, collecting only what is necessary, using personal information only for its intended purposes, ensuring accuracy, retaining it responsibly, safeguarding it effectively, and upholding accountability.

Our privacy practices, as outlined in our [Privacy Policy](#), align with laws across the jurisdictions where we operate. We also adhere to widely accepted security standards and practices to guide our decisions on protecting personal information.

CYBERSECURITY

Safeguarding our information systems as well as the information that we receive and store about our customers, employees, vendors, and others is a priority for Gap Inc. We maintain a cybersecurity program with technical and organizational safeguards that is designed to identify, assess, manage, mitigate, and respond to cybersecurity threats, including threats associated with the use of third-party systems.

Annually, employees receive cybersecurity training, and we provide additional targeted cybersecurity awareness and education activities throughout the year. In partnership with external consultants, we periodically conduct “tabletop” exercises with senior management and members of our Information Security, Information Technology, and Privacy teams, during which we simulate real-life cybersecurity incident scenarios to assess our preparedness, test our incident response plans, and highlight potential areas for improvement. Audits of our cybersecurity risk management processes are conducted periodically in order to test the effectiveness of controls designed to prevent and respond to cyberattacks at different levels within Gap Inc.

Gap Inc.’s Chief Information Security Officer (CISO) oversees the cybersecurity program and reports to the Chief Technology Officer (CTO). The CISO provides a quarterly update on the cybersecurity program on an alternating basis to the Audit and Finance Committee or the full Board.

MARKETING AND PRODUCT CLAIMS

We maintain measures that aim to ensure accurate, substantiated, and ethical representation of our products and services in all marketing messages, including all sustainability claims we make.

To support this, we have policies requiring every product claim to be supported by verified and documented environmental or social benefits. We actively [train our employees](#) on product claims, our [Product Claims Toolkit](#), and follow a thorough review, approvals, and [data validation process](#) for all public messaging.

Appendix

- Materiality Assessment
- GRI Index
- SASB Index
- TCFD Index
- Supplemental Data
- Data Assurance

Resources

- GENERAL
 - [Environmental, Social, and Governance Resources](#)
 - [Gap Inc. Sustainability Policies](#)
 - [SEC Filings](#)
- ENVIRONMENT
 - [CDP Submissions and Past Reports](#)
 - [Assurance Statements](#)
- SOCIAL
 - [Bridging the Inclusion Gap](#)
 - [Gap Inc. Privacy Policy](#)
 - [France and U.K. Gender Pay Gap Disclosure History](#)
- GOVERNANCE
 - [Gap Inc. Governance](#)
 - [Gap Inc. Corporate Compliance and Policies](#)
 - [Responsible Business Practices \(Managing Risks\)](#)

Materiality Assessment

In a rapidly changing world, we aim to address the issues that we can meaningfully impact and influence through our business. By identifying material environmental, social, and governance topics, we can respond to matters that are significant to our business and priority stakeholders.

MATERIAL TOPICS

In March 2023, we conducted a materiality assessment in partnership with a third-party expert aligned with the Global Reporting Initiative (GRI) Reporting Standards and AA1000 Accountability Principles. Key stakeholders, including Gap Inc. and brand employees, customers, investors, NGO leaders, and data aggregators were engaged through a survey and interviews as part of the assessment.

Learn more: [Materiality](#), [SEC Filings](#)

MATERIAL TOPICS		
Resource use, scarcity, and impact	Human rights and social impact	Governance and operating context
Water stewardship	Gender equity	Transparency and accountability
Chemicals management	Health and safety	Production volume management
Climate change response	Product quality and safety	Responsible marketing and consumer engagement
Emissions reduction	Employment standards	Talent attraction and workforce development
Land and natural resource use	Supply chain labor standards	Business integrity
Biodiversity	Community development	Data privacy and cybersecurity
Animal welfare	Inclusion and belonging	Purchasing practices
Circularity		
Waste management		
Plastic reduction		



Global Reporting Initiative (GRI) Index

Gap Inc. has reported the information cited in this GRI content index for the period February 4, 2024, to February 1, 2025, with reference to the GRI Standards (2016, 2018, 2020, and 2021). We consulted GRI 1: Foundation 2021 to build this content index. We do not report on any Sector Standards, as the requirements for Textiles and Apparel have not yet been released.

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
General Disclosures		
GRI 2: General Disclosures 2021	2-1 Organizational details	Impact Report; About This Report Annual Report; Part I, Item 1, Business Annual Report; Part I, Item 2, Properties Annual Report; Part II, Item 5, Market for Registrant’s Common Equity, Related Stockholder Matters and Issuer Purchases of Equity Securities
	2-2 Entities included in the organization’s sustainability reporting	Annual Report; Part I, Item 1, Business Exhibit 21 “Subsidiaries of Registrant”
	2-3 Reporting period, frequency and contact point	Impact Report; About This Report
	2-4 Restatements of information	2017 and 2022 emissions data has been restated as part of our science-based targets update and submission process. Impact Report; Environment, Climate Action
	2-5 External assurance	Impact Report; About This Report Impact Report; Appendix, Data Assurance
	2-6 Activities, value chain and other business relationships	Annual Report; Part I, Item 1, Business Annual Report; Part I, Item 2, Properties Annual Report; Part II, Item 7, Management’s Discussion and Analysis of Financial Condition and Results of Operations Impact Report; Governance, Management Oversight
	2-7 Employees	Annual Report; Part I, Item 1, Business Annual Report; Part II, Item 7, Management’s Discussion and Analysis of Financial Condition and Results of Operations
GRI 2: General Disclosures 2021 (cont.)	2-8 Workers who are not employees	Impact Report; Social, Human Rights Impact Report; Social, Factory Programs

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
	2-9 Governance structure and composition	Impact Report; Governance, Management Oversight Investor Relations Webpages; Corporate Governance Fact Sheet Investor Relations Webpages; Committee Composition Investor Relations Webpages; Board of Directors
	2-10 Nomination and selection of the highest governance body	Investor Relations Webpages; Corporate Governance Fact Sheet Investor Relations Webpages; Board of Directors
	2-11 Chair of the highest governance body	Investor Relations Webpages; Board of Directors
	2-12 Role of the highest governance body in overseeing the management of impacts	Impact Report; Governance, Stakeholder and Political Engagement Impact Report; Governance, Management Oversight Impact Report; Governance, Risk Management Impact Report; Governance, Business Ethics and Integrity Investor Relations Webpages; Corporate Governance Guidelines Webpages; Management Approach 2024 CDP Submission ; 4.1.2, 4.3, 4.3.1
	2-13 Delegation of responsibility for managing impacts	Investor Relations Webpages; Committee Composition Investor Relations Webpages; Governance and Sustainability Committee Charter Impact Report; Governance, Management Oversight
	2-14 Role of the highest governance body in sustainability reporting	Investor Relations Webpages; Governance and Sustainability Committee Charter Impact Report; Governance, Management Oversight
	2-15 Conflicts of interest	Investor Relations Webpages; Corporate Compliance
	2-16 Communication of critical concerns	Impact Report; Governance, Management Oversight
	2-17 Collective knowledge of the highest governance body	2024 CDP Submission ; 4.2
	2-18 Evaluation of the performance of the highest governance body	Investor Relations Webpages; Governance Investor Relations Webpages; Corporate Governance Guidelines Investor Relations Webpages; Corporate Governance Fact Sheet
GRI 2: General Disclosures 2021 (cont.)		

³⁴ Note: “Impact Report” refers to Gap Inc.’s 2024 Impact Report; “Webpages” refer to our Global Website; “Annual Report” refers to Gap Inc.’s [Annual Report](#) on Form 10-K for the fiscal year ended February 1, 2025; and “Proxy Statement” refers to the [Notice of Annual Meeting and Proxy Statement for the 2025 Annual Meeting of Shareholders](#). Please find more information on our Investor Relations Webpages.

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
	2-19 Remuneration policies	Proxy Statement 2024
	2-20 Process to determine remuneration	Proxy Statement 2024
	2-21 Annual total compensation ratio	Proxy Statement 2024; CEO Pay Ratio; p. 60
	2-22 Statement on sustainable development strategy	Impact Report; Our Impact Approach Impact Report; Governance, Supplier Compliance
	2-23 Policy commitments	Gap Inc. applies the precautionary principle to its use of chemicals through testing of its products and its commitment to the elimination of PFC-based finishes. For more information, please see Chemicals Management and Impact Report; Governance, Business Ethics and Integrity
	2-24 Embedding policy commitments	Impact Report; Governance, Business Ethics and Integrity
	2-25 Processes to remediate negative impacts	Impact Report; Governance, Stakeholder and Political Engagement Impact Report; Governance, Supplier Compliance
	2-26 Mechanisms for seeking advice and raising concerns	Investor Relations Webpages; Corporate Compliance Investor Relations Webpages; Code of Business Conduct Impact Report; Governance, Business Ethics and Integrity
	2-27 Compliance with laws and regulations	Investor Relations Webpages; Corporate Compliance Impact Report; Governance, Business Ethics and Integrity
	2-28 Membership associations	Impact Report; Our Impact Approach
	2-29 Approach to stakeholder engagement	Impact Report; Governance, Stakeholder and Political Engagement
	2-30 Collective bargaining agreements	Webpages; Human Rights Policy
MATERIAL TOPICS		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Impact Report; About This Report Impact Report; Appendix, Materiality Assessment
	3-2 List of material topics	Impact Report; Appendix, Materiality Assessment
ECONOMIC PERFORMANCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Annual Report; Part II, Item 7, Management’s Discussion and Analysis of Financial Condition and Results of Operations Annual Report; Part II, Item 7A, Quantitative and Qualitative Disclosures About Market Risk

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Annual Report; Part II, Item 7, Management’s Discussion and Analysis of Financial Condition and Results of Operations
	201-2 Financial implications and other risks and opportunities due to climate change	2024 CDP Submission ; 2.4, 2.2.2, 3.1, 3.1.1, 3.6, 3.6.1, 9.3
	201-3 Defined benefit plan obligations and other retirement plans	Impact Report; Social, Human Capital Management Webpages; Perks & Benefits
	201-4 Financial assistance received from government	Information unavailable/incomplete.
PROCUREMENT PRACTICES		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Appendix, Materiality Assessment Impact Report; Social, Human Rights Impact Report; Governance, Supplier Compliance Impact Report; Environment, Product
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Information unavailable/incomplete.
ANTI-CORRUPTION		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Governance, Business Ethics and Integrity
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Impact Report; Governance, Business Ethics and Integrity
	205-2 Communication and training about anti-corruption policies and procedures	Impact Report; Governance, Business Ethics and Integrity
	205-3 Confirmed incidents of corruption and actions taken	Impact Report; Governance, Business Ethics and Integrity
ANTI-COMPETITIVE BEHAVIOR		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Governance, Business Ethics and Integrity
GRI 206: Anticompetitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Impact Report; Governance, Business Ethics and Integrity
MATERIALS		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Environment, Product
		Impact Report; Environment, Circularity and Waste

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
GRI 301: Materials 2016	301-1 Materials used by weight or volume	Impact Report; Appendix, SASB Index , CG-AA-440a.4 Impact Report; Environment, Product
	301-2 Recycled input materials used	Impact Report; Appendix, SASB Index , CG-AA-440a.4 Impact Report; Environment, Product
	301-3 Reclaimed products and their packaging materials	0% – Gap Inc. does not directly collect to reuse or recycle any products.
ENERGY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Environment, Climate Action 2024 CDP Submission ; 4.1.2, 4.2, 4.3, 4.3.1, 4.5.1
GRI 302: Energy 2016	302-1 Energy consumption within the organization	2024 CDP Submission ; 7.5, 7.29, 7.30, 7.30.1, 7.30.6, 7.30.7, 7.30.14, 7.30.16 Impact Report; Environment, Climate Action Impact Report; Appendix, SASB Index , CG-MR-130a.1 Impact Webpages; Assurance Statements Impact Report; Appendix, Data Assurance
	302-2 Energy consumption outside of the organization	2024 CDP Submission ; 7.5, 7.8, 7.29, 7.30, 7.30.1, 7.30.6, 7.30.7, 7.30.14, 7.30.16 Impact Report; Environment, Climate Action
	302-3 Energy intensity	2024 CDP Submission ; 7.45 Impact Report; Environment, Climate Action
GRI 302: Energy 2016 (cont.)	302-4 Reduction of energy consumption	2024 CDP Submission ; 7.53.1, 7.54, 7.54.1, 7.55, 7.55.1, 7.55.2, 7.55.3 Impact Report; Environment, Climate Action
	302-5 Reductions in energy requirements of products and services	2024 CDP Submission ; 7.74 Impact Report; Environment, Climate Action Impact Report; Environment, Product
WATER AND EFFLUENTS		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Environment, Water Stewardship 2024 CDP Submission ; 2.2.1, 2.2.2, 2.4, 3.1, 3.1.1, 4.1.2, 4.3, 4.3.1, 4.6, 4.6.1, 5.1, 5.1.1, 6.1, 9.1, 9.2

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Impact Report; Environment, Water Stewardship 2024 CDP Submission ; 2.2.1, 2.2.2, 3.1.1, 5.11, 5.11.1, 5.11.5, 5.11.6, 5.11.7, 5.11.9, 9.15.1, 9.15.2
	303-2 Management of water discharge-related impacts	Impact Report; Environment, Water Stewardship Impact Report; Environment, Product
	303-3 Water withdrawal	Impact Report; Environment, Water Stewardship 2024 CDP Submission ; 9.2.2, 9.2.4, 9.2.7
	303-4 Water discharge	2024 CDP Submission ; 9.2.2, 9.2.8, 9.2.9
	303-5 Water consumption	2024 CDP Submission ; 9.2.2, 9.2.8, 9.2.9
GRI 303: Water and Effluents 2018 (cont.)		
BIODIVERSITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Environment, Product
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Impact Report; Environment, Product Impact Report; Environment, Climate Action
	304-2 Significant impacts of activities, products and services on biodiversity	Impact Report; Environment, Product
GRI 304: Biodiversity 2016 (cont.)	304-3 Habitats protected or restored	Information unavailable as we are currently working to expand our Wood-Derived Fabric Policy to address land use, forest conservation, and deforestation risks.
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	
EMISSIONS		
GRI 3: Material Topics 2021	3-3 Management of material topics	2024 CDP Submission ; 2.2.2, 3.1.1, 3.6.1, 4.1.2, 5.1.2, 5.3.1, 5.3.2, 7.55.3 Impact Report; Environment, Climate Action
		Webpages; Assurance Statements Impact Report; Appendix, Data Assurance
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	2024 CDP Submission ; 7.2, 7.5, 7.6, 7.10.1, 7.15, 7.15.1, 7.16, 7.17, 7.17.1, 7.45 Impact Report; Environment, Climate Action Webpages; Assurance Statements Impact Report; Appendix, Data Assurance
	305-2 Energy indirect (Scope 2) GHG emissions	2024 CDP Submission ; 7.2, 7.3, 7.4, 7.5, 7.7, 7.10.1, 7.10.2, 7.16, 7.20, 7.20.1, 7.45 Impact Report; Environment, Climate Action Impact Webpages; Assurance Statements Impact Report; Appendix, Data Assurance

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
GRI 305: Emissions 2016 (cont.)	305-3 Other indirect (Scope 3) GHG emissions	2024 CDP Submission ; 7.2, 7.5, 7.8 Impact Report; Environment, Climate Action Webpages; Assurance Statements Impact Report; Appendix, Data Assurance
	305-4 GHG emissions intensity	2024 CDP Submission 7.45 Impact Report; Environment, Climate Action
	305-5 Reduction of GHG emissions	2024 CDP Submission ; 3.6.1, 7.5, 7.53, 7.53.1, 7.54, 7.54.1, 7.54.3, 7.55, 7.55.1, 7.55.2 Impact Report; Environment, Climate Action Impact Report; Gap Inc. Goals and Progress
	305-6 Emissions of ozone-depleting substances (ODS)	Gap Inc. has no ozone-depleting substance emissions.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	2024 CDP Submission ; 7.15.1 Impact Report; Environment, Climate Action
WASTE		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Environment, Circularity and Waste
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Impact Report; Environment, Circularity and Waste
	306-2 Management of significant waste-related impacts	Impact Report; Environment, Circularity and Waste
	306-3 Waste generated	Impact Report; Environment, Circularity and Waste
	306-4 Waste diverted from disposal	Impact Report; Environment, Circularity and Waste Impact Report; Appendix, SASB Index , CG-MR-410a.3
	306-5 Waste directed to disposal	Impact Report; Environment, Circularity and Waste
SUPPLIER ENVIRONMENTAL ASSESSMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Governance: Supplier Compliance Impact Report; Environment, Water Stewardship
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Impact Report; Appendix, SASB Index , CG-AA-430a.1, CG-AA-430a.2, CG-AA-430b.1, CG-AA-430b.2
GRI 308: Supplier Environmental Assessment 2016 (cont.)	308-2 Negative environmental impacts in the supply chain and actions taken	Impact Report; Governance: Supplier Compliance
		Impact Report; Environment, Water Stewardship
		Impact Report; Environment, Climate Action
		Impact Report; Appendix, SASB Index , CG-AA-430b.2

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
EMPLOYMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Social, Human Capital Management
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Impact Report; Appendix, Supplemental Data Impact Report; Appendix, SASB Index , CG-EC-330a.2
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Impact Report; Social, Human Capital Management Webpages; Perks & Benefits
	401-3 Parental leave	Impact Report; Social, Human Capital Management Webpages; Perks & Benefits
OCCUPATIONAL HEALTH AND SAFETY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Social, Human Capital Management
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Impact Report; Social, Human Capital Management
	403-2 Hazard identification, risk assessment, and incident investigation	Impact Report; Social, Human Capital Management
	403-3 Occupational health services	Impact Report; Social, Human Capital Management
	403-4 Worker participation, consultation, and communication on occupational health and safety	Impact Report; Social, Human Capital Management
	403-5 Worker training on occupational health and safety	Impact Report; Social, Human Capital Management
	403-6 Promotion of worker health	Impact Report; Social, Human Capital Management
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Impact Report; Social, Human Capital Management
	403-8 Workers covered by an occupational health and safety management system	Impact Report; Social, Human Capital Management
	403-9 Work-related injuries	Impact Report; Social, Human Capital Management
	403-10 Work-related ill health	Impact Report; Social, Human Capital Management
TRAINING AND EDUCATION		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Social, Human Capital Management

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Impact Report; Social, Human Capital Management
	404-2 Programs for upgrading employee skills and transition assistance programs	Impact Report; Social, Human Capital Management
	404-3 Percentage of employees receiving regular performance and career development reviews	Impact Report; Social, Human Capital Management
DIVERSITY AND EQUAL OPPORTUNITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Social, Inclusion and Belonging
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Impact Report; Appendix, Supplemental Data 2024 EEO-1 Consolidated Report
	405-2 Ratio of basic salary and remuneration of women to men	Impact Report; Social, Inclusion and Belonging Investor Relations Webpages; Corporate Compliance France and U.K. Gender Pay Gap Disclosure History
LOCAL COMMUNITIES		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Social, Opportunity Programs Impact Report; Environment, Water Stewardship
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Impact Report; Social, Opportunity Programs Impact Report; Environment, Water Stewardship
	413-2 Operations with significant actual and potential negative impacts on local communities	Impact Report; Environment, Water Stewardship Impact Report; Environment, Product
SUPPLIER SOCIAL ASSESSMENTS AND LABOR		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Social, Human Rights Impact Report; Governance, Supplier Compliance Webpages; California Transparency in Supply Chains Act & U.K. Modern Slavery Act Statement
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Impact Report; Governance, Supplier Compliance Impact Report; Appendix, SASB Index , CG-AA-430b.1, CG-AA-430b.2
	414-2 Negative social impacts in the supply chain and actions taken	Impact Report; Appendix, SASB Index , CG-AA-430b.1, CG-AA-430b.2 Webpages; Grievance Mechanisms

GRI STANDARD	DISCLOSURE	GAP INC. REFERENCE(S) ³⁴
GRI 406: Nondiscrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Impact Report; Governance, Supplier Compliance Impact Report; Appendix, SASB Index , CG-AA-430b.1, CG-AA-430b.2 Webpages; Discrimination and Harassment
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Impact Report; Social, Human Rights Impact Report; Governance, Supplier Compliance Webpages; Child Labor and Young Workers
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Impact Report; Social, Human Rights Impact Report; Governance, Supplier Compliance Webpages; Human Trafficking and Forced Labor
PUBLIC POLICY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Governance, Stakeholder and Political Engagement Webpages; Political Engagement Policy
GRI 415: Public Policy 2016	415-1 Political contributions	Impact Report; Governance, Stakeholder and Political Engagement Webpages; Political Engagement Policy
CUSTOMER HEALTH AND SAFETY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Impact Report; Environment, Product
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Impact Report; Environment, Product
	416-2 Incidents of noncompliance concerning the health and safety impacts of products and services	Zero incidents of noncompliance were observed in 2024. Consumer Product Safety Commission

Sustainability Accounting Standards Board (SASB) Index

The International Sustainability Standards Board (ISSB) of the International Financial Reporting Standards (IFRS) is an independent, private-sector standards-setting organization dedicated to enhancing the efficiency of capital markets by fostering high-quality disclosure of material sustainability information that meets investor needs. We disclose to the Standard for the Apparel, Accessories & Footwear industry, and select relevant disclosures from the E-Commerce and Multiline and Specialty Retailers & Distributors industries, as defined by the SASB Sustainable Industry Classification System (SICS).

TOPIC/ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	CODE	DATA	REFERENCE(S) ³⁵
APPAREL, ACCESSORIES & FOOTWEAR					
Management of Chemicals in Product					
Discussion of processes to maintain compliance with restricted substances regulations	Discussion and Analysis	N/A	CG-AA-250a.1	<p>Gap Inc. chemical restrictions are informed by global regulations, as well as hazard- and risk-based considerations. They include our Restricted Substances List (RSL) and our Manufacturing Restricted Substances List (MRSL). Since 2008, Gap Inc. suppliers have been expected to comply with our RSL. Since 2015, we have asked all of our suppliers to comply with the Zero Discharge of Hazardous Chemicals (ZDHC) MRSL, and we are aligned with the Apparel and Footwear International RSL Management (AFIRM) Group RSL. We track emerging chemical issues and update our approach as needed. Our approach to implementation of our chemical policies includes:</p> <ol style="list-style-type: none">Industry partnerships and standards: We partner with industry groups, including the AFIRM Group and Cascale to implement a consistent set of tools and processes to support best practices, monitor supplier performance, and encourage use of safer chemicals.Supplier engagement: We communicate chemical compliance requirements to our suppliers in our Code of Vendor Conduct (COVC) and Mill Compliance Agreement, and we require our suppliers to acknowledge and comply with these conditions.Compliance and monitoring: Through third-party testing of products, product components, and wastewater effluent, as well as the use of industry data platforms, we monitor the performance of our supply chain and verify compliance with global chemical regulations and Gap Inc. chemical restrictions. <p>To learn more about this process, please see the Chemicals Management page.</p>	Impact Report; Environment, Product
Discussion of processes to assess and manage risks and/ or hazards associated with chemicals in products	Discussion and Analysis	N/A	CG-AA-250a.2	<p>Gap Inc. uses the following processes to assess and manage potential risks and hazards associated with their product materials and chemicals. We track emerging chemical issues, leverage industry partnerships, and analyze information from experts and our supply chain to assess potential risks and hazards. We communicate chemical compliance requirements to our suppliers in our Code of Vendor Conduct (COVC), and we require our suppliers to acknowledge and comply with these conditions. We have implemented a Manufacturing Restricted Substances List (MRSL) and a Restricted Substances List (RSL) and update our approach as needed. Through third-party testing of products, product components, and wastewater effluent, as well as the use of industry data platforms, we monitor the performance of our supply chain and verify compliance with global chemical regulations and Gap Inc. chemical restrictions.</p> <ol style="list-style-type: none">Input Management: The selection of better chemical inputs and starting materials is an essential part of reducing the use and discharge of hazardous chemicals.Process Management: Adherence to chemicals management best practices during manufacturing is critical for reducing both human and environmental risks.Output Management: The outputs of apparel and footwear manufacturing include finished products as well as wastewater. Gap Inc. restricts chemicals of known concern.	Impact Report; Environment, Product

³⁵ Note: “Impact Report” refers to Gap Inc.’s 2024 Impact Report; “Webpages” refer to our Global Website; “Annual Report” refers to Gap Inc.’s [Annual Report](#) on Form 10-K for the fiscal year ended February 1, 2025; and “Proxy Statement” refers to the [Notice of Annual Meeting and Proxy Statement for the 2025 Annual Meeting of Shareholders](#). Please find more information on our Investor Relations Webpages.

TOPIC/ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	CODE	DATA	REFERENCE(S) ³⁵
Environmental Impacts in the Supply Chain					
Percentage of (1) Tier 1 supplier facilities and (2) supplier facilities beyond Tier 1 in compliance with wastewater discharge permits and/or contractual agreements	Quantitative	Percentage (%)	CG-AA-430a.1	<u>Total participants in our Water Quality Program:</u> 2022: 156 2023: 170 2024: 294	Impact Report; Environment, Water Stewardship
				<u>% Tier 1 meeting both conventional and ZDHC MRSL parameters:</u> 2022: 99% 2023: 95% 2024: 91%	Impact Report; Environment, Product
				<u>% Tier 2 meeting both conventional and ZDHC MRSL parameters:</u> 2022: 95% 2023: 91% 2024: 89%	
Percentage of (1) Tier 1 supplier facilities and (2) supplier facilities beyond Tier 1 that have completed the Sustainable Apparel Coalition’s Higg Index Facility Module (Higg FEM) assessment or an equivalent environmental data assessment	Quantitative	Percentage (%)	CG-AA-430a.2	<u>Tier 1 branded suppliers using Higg Index FEM:</u> 2022: 100% (589) 2023: 100% (565) 2024: 100% (567)	Impact Report; Environment, Water Stewardship
				<u>Tier 1 branded suppliers verified Higg Index FEM:</u> 2022: 75% (441) 2023: 85% (478) 2024: 92% (519)	Impact Report; Environment, Climate Action
				<u>Tier 2 suppliers using Higg Index FEM:</u> 2022: 73% (152) 2023: 73% (200) 2024: 75% (186)	
				<u>Tier 2 suppliers verified Higg Index FEM:</u> 2022: 88% (133) 2023: 92% (184) 2024: 70% (174)	
Labor Conditions in the Supply Chain					
Percent of (1) Tier 1 supplier facilities and (2) supplier facilities beyond Tier 1 that have been audited to a labor code of conduct, (3) percentage of total audits conducted by a third-party auditor	Quantitative	Percentage (%)	CG-AA-430b.1	<u>% Tier 1 branded suppliers audited to COVC:</u> 2022: 88% 2023: 100% 2024: 100%	Impact Report; Social, Human Rights
				<u>% of audits conducted by third-party assessor (such as ILO-IFC Better Work and Social & Labor Convergence Program (SLCP)):</u> 2022: 88% 2023: 83% 2024: 89%	Impact Report; Governance, Supplier Compliance
				<u>% of suppliers beyond Tier 1 audited to COVC:</u> 2022: 24% 2023: 31% 2024: 33% ³⁶	
Priority non-conformance rate and associated corrective action rate for suppliers’ labor code of conduct audits	Quantitative	Rate	CG-AA-430b.2	We use a color-coded system to rate each facility’s performance. High-performing facilities with no critical and few violations are rated green; average performers are yellow; and those that need to address one or more serious issues are red.	Impact Report; Governance, Supplier Compliance
				<u>Assessed Factory Ratings:</u> Green – 2022: 74% 2023: 79% 2024: 78% Yellow – 2022: 25% 2023: 20% 2024: 20% Red – 2022: <1% 2023: 1% 2024: 2%	Webpages; COVC Findings
				<u>COVC Issue Resolution Rate</u> % of issues open at beginning of the year that associated corrective actions plans were resolved by end of the fiscal year: 2022: 81% 2023: 78% 2024: 82%	

³⁶ This represents the percentage of identified facilities beyond Tier 1 audited to our COVC through SLCP. We have identified and confirmed 532 mill facilities (this number is inclusive of vendor-sourced mills) in our supply chain and recognize this metric may change as more information is available.

TOPIC/ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	CODE	DATA	REFERENCE(S) ³⁵
Description of greatest (1) labor and (2) environmental, health, and safety risks in the supply chain	Discussion and Analysis	N/A	CG-AA-430b.3	<div><div>1. The labor practices and working conditions at the third-party suppliers that make apparel for Gap Inc. brands can affect reputation, business resilience, and operating costs for our company.</div><div>2. Excessive overtime, fire and structural safety, and harassment are high-risk supply chain issues that we have specific programs in place to address.</div></div>	Impact Report; Social, Human Rights Impact Report; Governance, Supplier Compliance
Raw Material Sourcing					
(1) List of priority raw materials; for each priority raw material: (2) environmental and/ or social factor(s) most likely to threaten sourcing, (3) discussion on business risks and/or opportunities associated with environmental and/ or social factors, and (4) management strategy for addressing business risks and opportunities	Discussion and Analysis	N/A	CG-AA-440a.3	<div><div>Environmental and/or Social Factors and Discussion of Business Risks and/or Opportunities:</div><div><div><div>Cotton: Changes in water access, drought, flooding, heat waves, soil deterioration, and other climate, water, and biodiversity impacts can affect availability, cost, and quality of cotton crops. Farming and processing cotton typically involves the use of large quantities of water and chemicals, and often occurs in regions facing water and climate risks.</div><div>Polyester: As a petroleum-based synthetic fiber, the production of polyester and recycled polyester (rPET) is susceptible to price fluctuations driven by changes in demand, availability, and environmental factors in our regions of procurement and production.</div></div><div>Management Strategy:</div><div>Our fibers strategy relies on life cycle assessment (LCA) data to evaluates factors like biodiversity, circularity, chemistry, land use change, and social conditions within production. Gap Inc.’s Supply Chain and Sourcing teams monitor and respond to risks for key raw materials using a multi-factor model that includes cotton and polyester fiber prices.</div><div>We measure our progress by setting and working toward public goals to increase the percentage of more sustainable cotton and recycled polyester used in our products. We collaborate with industry partners such as the Textile Exchange Recycled Polyester Challenge, rPET Round Table, and Biosynthetics Working Group to improve the sourcing of materials.³⁷</div></div></div> <div>Impact Report; Environment, Product 2024 CDP Submission; 2.2.2, 4.5</div>	
(1) Amount of priority raw materials purchased, by materials, and (2) amount of each priority raw material that is certified to a third-party environmental and/or social standard, by standard	Quantitative	Metric tons (t)	CG-AA-440a.4	<div><div>% cotton certified as Better Cotton Initiative (BCI), Global Organic Textile Standard (GOTS), Organic Content Standard (OCS)</div><div>2022: 81% 2023: 98% 2024: 98%</div><div>% polyester certified as Global Recycled Standard (GRS), Recycled Claim Standard (RCS)</div><div>2022: 16% 2023: 19% 2024: 40%³⁸</div></div>	Impact Report; Environment, Product
Activity Metric					
Number of (1) Tier 1 suppliers and (2) suppliers beyond Tier 1	Quantitative	Number	CG-AA-000.A	<div><div># of Tier 1 branded supplier factories:</div><div>2022: 702 2023: 682 2024: 606</div><div># of mill facilities (Tier 2):</div><div>2022: 249 2023: 707 2024: 532³⁹</div></div>	Impact Report; Governance, Supplier Compliance

³⁷ Our priority raw materials were identified following Textile Exchange guidance in support of our United Nations Framework Convention on Climate Change (UNFCCC) Commitment 6 to source 100% of priority materials that are both preferred and low climate impact by 2030.

³⁸ Percentages may also include fibers that pass an internal threshold of traceability standards for more sustainable practices.

³⁹ This number represents mill facilities that have passed our legal compliance vetting process and are subject to our Mill Compliance Agreement.

TOPIC/ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	CODE	DATA	REFERENCE(S) ³⁵
E-COMMERCE					
Hardware Infrastructure Energy & Water Management					
(1) Total water withdrawn; (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	Cubic meters (m3), Percentage (%)	CG-EC-130a.2	See references for water withdrawn and consumed. <u>Water consumption in WWF risk level <2.5:</u> 2022: 5% 2023: 4% 2024: 18% <u>Water consumption in WWF risk level 2.5–3.5:</u> 2022: 65% 2023: 61% 2024: 61% <u>Water consumption in WWF risk level 3.5–4.5:</u> 2022: 22% 2023: 32% 2024: 20% <u>Water consumption in WWF risk level >4.5:</u> 2022: 0% 2023: 0% 2024: 0.3% <u>Water consumption in WWF risk level not yet assessed:</u> 2022: 8% 2023: 3% 2024: 0.1%	Impact Report; Environment, Water Stewardship
Data Security					
Description of approach to identifying and addressing data security risks	Discussion and Analysis	N/A	CG-EC-230a.1	See references.	Annual Report; Item 1C, Cybersecurity Privacy Policy
Employee Recruitment, Inclusion & Performance					
Employee engagement as a percentage	Quantitative	Percentage (%)	CG-EC-330a.1	85% of employees who participated in our 2024 census survey are engaged, demonstrating satisfaction by answering “Agree” or “Strongly Agree” to the question “I am happy working at Gap Inc.”	Impact Report; Social, Human Capital Management
(1) Voluntary and (2) involuntary turnover rate for all employees	Quantitative	Rate	CG-EC-330a.2	<u>Voluntary turnover rate:</u> 2022: 87% 2023: 84% 2024: 72% <u>Involuntary turnover rate:</u> 2024: 16%	Impact Report; Appendix, Supplemental Data
Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	Quantitative	Percentage (%)	CG-EC-330a.3	See references.	2024 EEO-1 Consolidated Report
Product Packaging & Distribution					
Total greenhouse gas (GHG) footprint of product shipments	Quantitative	Metric tons (t) CO ₂ e	CG-EC-410a.1	See references for Scope 3 Categories 4 and 9 (upstream and downstream transportation and distribution).	Impact Report; Environment, Climate Action
Discussion of strategies to reduce the environmental impact of product delivery	Discussion and Analysis	N/A	CG-EC-410a.2	Gap Inc. is a signatory of the Arctic Corporate Shipping Pledge. Created in partnership with Ocean Conservancy, the pledge is a commitment to never intentionally send ships through the Arctic’s fragile ecosystem. Gap Inc. is also a member of the Environmental Protection Agency’s (EPA) SmartWay Transport Partnership, an initiative that empowers businesses to move goods in the cleanest, most energy-efficient way possible to protect public health and reduce emissions. Gap Inc. was recognized by the EPA with the 2024 SmartWay Excellence Award for outstanding environmental performance and leadership.	Impact Report; Environment, Climate Action

TOPIC/ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	CODE	DATA	REFERENCE(S) ³⁵
Activity Metrics					
Entity-defined measure of user activity	Quantitative	Number	CG-EC-000.A	<u>Total global online orders (placed in the United States Specialty (web and app), U.S. Factory, Canada, and Japan; excludes franchises, cancellations, and returns):</u> 2022: 80.2 million 2023: 76.1 million 2024: 103.1 million	
Number of shipments	Quantitative	Number	CG-EC-000.C	<u>Total global shipments to customers (in the United States, Canada, and Japan; excludes franchises)</u> 2022: 112.9 million 2023: 102.8 million 2024: 105.9 million	
MULTILINE AND SPECIALTY RETAILERS AND DISTRIBUTORS					
Energy Management in Retail & Distribution					
(1)Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	Quantitative	Gigajoules (GJ)	CG-MR-130a.1 CG-EC-130a.1	Percentage of grid electricity is not available. <u>Total energy consumed at retail and distribution centers (GJ)</u> 2022: 2,935,820 2023: 2,835,015 2024: 2,326,626 <u>% renewable energy at retail and distribution centers:</u> 2022: 33% 2023: 38% 2024: 35%	Impact Report; Environment, Climate Action 2024 CDP Submission ; 7.30, 7.30.1
Workforce Diversity & Inclusion					
Percentage of gender and racial/ethnic group representation for (1) management and (2) all other employees	Quantitative	Percentage (%)	CG-MR-330a.1	See CG-EC-330a.3 and references.	2024 EEO-1 Consolidated Report
Product Sourcing, Packaging, and Marketing					
Discussion of processes to assess and manage risks and/ or hazards associated with chemicals in products	Discussion and Analysis	N/A	CG-MR-410a.2	See CG-AA-250a.2.	Impact Report; Environment, Product
Discussion of strategies to reduce the environmental impact of packaging	Discussion and Analysis	N/A	CG-MR-410a.3	See references.	Impact Report; Environment, Circularity and Waste
Activity Metrics					
Number of: (1) retail locations and (2) distribution centers	Quantitative	Number	CG-MR-000.A	<u>Company-operated stores:</u> 2022: 2,685 2023: 2,562 2024: 2,506 <u>Franchises:</u> 2022: 667 2023: 998 2024: 1,063	Annual Report 2024 ; p. 28 Annual Report 2023 ; p.28 Annual Report 2022 ; p.28
Total area of: (1) retail space and (2) distribution centers	Quantitative	Square feet (m2)	CG-MR-000.B	<u>Retail space (in millions of square feet):</u> 2022: 31.8 2023: 30.6 2024: 30.1 <u>Distribution center space (in millions of square feet):</u> 2022: 9.5 2023: 9.6 2024: 9.6	Annual Report 2024 ; p. 21–22 Annual Report 2023 ; p.22 Annual Report 2022 ; pp.20–21

Task Force on Climate-Related Financial Disclosures (TCFD) Index

The TCFD is a framework of recommendations for companies to make more effective climate-related disclosures that could promote more informed investment, credit, and insurance underwriting decisions. This year marks our fourth year reporting to TCFD.

TCFD METRICS	GAP INC. REFERENCE(S) ⁴⁰
GOVERNANCE: Disclose the organization’s governance around climate-related risks and opportunities.	
a) Describe the board’s oversight of climate-related risks and opportunities.	2024 CDP Submission ; 4.1.2 Impact Report; Governance, Management Oversight Impact Report; Governance, Risk Management
b) Describe management’s role in assessing and managing climate-related risks and opportunities.	2024 CDP Submission ; 4.3, 4.3.1 Impact Report; Governance, Management Oversight Impact Report; Governance, Risk Management
STRATEGY: Disclose the actual and potential impacts of climate-related risks and opportunities on the organization’s businesses, strategy and financial planning.	
a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	2024 CDP Submission ; 2.1, 3.1, 3.1.1, 3.6, 3.6.1 Impact Report; Environment, Climate Action
b) Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning.	2024 CDP Submission ; 3.1.1, 3.6.1, 5.1.1, 5.1.2, 5.2 Impact Report; Environment, Climate Action
c) Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	2024 CDP Submission ; 2.2.2, 5.1, 5.1.1, 5.1.2 Impact Report; Environment, Climate Action

TCFD METRICS	GAP INC. REFERENCE(S) ⁴⁰
RISK MANAGEMENT: Disclose how the organization identifies, assesses and manages climate-related risks.	
a) Describe the organization’s processes for identifying and assessing climate-related risks	2024 CDP Submission ; 2.2.2 Impact Report; Governance, Risk Management
b) Describe management’s role in assessing and managing climate-related risks and opportunities.	2024 CDP Submission ; 2.2.1, 2.2.2 Impact Report; Governance, Risk Management
c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.	2024 CDP Submission ; 2.2.1, 2.2.2 Impact Report; Governance, Risk Management
METRICS: Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities.	
a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	2024 CDP Submission ; 7.54, 7.54.1, 7.54.3, 9.15, 9.15.1, 9.15.2 Impact Report; Environment, Climate Action Impact Report; Environment, Water Stewardship
b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	2024 CDP Submission ; 7.6, 7.7, 7.8, 7.8.1 Impact Report; Environment, Climate Action
c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	2024 CDP Submission ; 5.2, 7.53, 7.53.1, 7.54, 7.54.1, 7.54.3, 9.15, 9.15.1, 9.15.2 Impact Report; Gap Inc. Goals and Progress

⁴⁰ Note: “Impact Report” refers to Gap Inc.’s 2024 Impact Report; “Webpages” refer to our Global Website; “Annual Report” refers to Gap Inc.’s [Annual Report](#) on Form 10-K for the fiscal year ended February 1, 2025; and “Proxy Statement” refers to the [Notice of Annual Meeting and Proxy Statement for the 2025 Annual Meeting of Shareholders](#). Please find more information on our Investor Relations Webpages.

Supplemental Data

	FY 2022	FY 2023	FY 2024
Total number of employees at end of year, reported in our Form 10-K	95,000	85,000	82,000
Total number of new employee hires ⁴¹	Not reported	89,000	75,000
Board of Directors ⁴²			
Board size	12	11	11
Number of independent directors	11	10	10
Tenure			
0–2 years	4	3	2
2–5 years	2	3	4
5+ years	6	5	5
Age Distribution			
40s	0	0	0
50s	7	6	7
60s	4	5	2
70s	1	0	2
Companywide Employee Age Representation			
<30 years old	57%	56%	56%
30–50 years old	31%	31%	31%
>50 years old	12%	13%	13%
Internal Hiring Rate by Position			
VP and above	71%	96%	70%
Director/Senior Director	65%	74%	81%
Manager/Senior Manager	48%	55%	75%
Overall (including Store Associates)	36%	40%	35%
Occupational Health and Safety – Includes Full-Time Employees ⁴³			
Occupational injury-related fatalities	0	0	0
Rate of injury per 1,000,000 hours worked (LTIFR)	4.19	4.08	3.79
Coverage (% of full-time employees)	88%	94%	85%

⁴¹ Data includes temporary and seasonal employee hires, globally. Data may differ from prior year reports due to the updated scope.

⁴² This information is as reported in our Proxy Statements for relevant years.

⁴³ This data reflects calendar year 2024.

Data Assurance



Safety. Science. Transformation.™

Verification Opinion Declaration:
Greenhouse Gas Emissions and Environmental Data

Project Number: 4791684810
Issue Date: May 14, 2025



To: The Stakeholders of The Gap, Inc.

UL Solutions has verified the GHG emissions and environmental data statement of The Gap, Inc. (hereinafter referred to as "Gap Inc.") to a limited level of assurance for the period of February 1st, 2024, to January 31st, 2025. In UL Solutions' opinion, based on the verification activities performed, there is no evidence that the GHG emissions and environmental data statement:

- is not materially correct and is not a fair representation of GHG data and information
- has not been prepared in accordance with ISO 14064 Part 1: 2018 and the GHG Protocol Corporate Standard

GHG emissions and environmental data statement:

SCOPE	SOURCE	UNIT	QUANTITY
GHG (Scope 1)	Total direct emissions [natural gas, propane, fuel oil, diesel, jet fuel, refrigerants]	Metric tons CO2e	39,569
	Total indirect emissions (location-based) [electricity (grid, DPPA, vPPA), chilled water, steam]		210,902
GHG (Scope 2)	Total indirect emissions (market-based) [electricity (grid, DPPA, vPPA), chilled water, steam]		59,753
	Category 3 – Fuel and energy related activities		51,664
GHG (Scope 3)	Category 4 – Upstream transportation and distribution		526,578
	Category 5 – Waste generated in operations		13,295
	Category 6 – Business travel		21,119
	Category 7 – Employee commuting		76,290
	Category 9 – Downstream transportation and distribution		126,896
	Category 11 – Use of sold products		977,583
	Category 12 – End of life treatment of sold products		105,260
	Category 14 – Franchises (electric power)		25,715
	Total other indirect emissions		1,924,400
Total Energy	Direct energy consumption [natural gas, propane, fuel oil, diesel, jet fuel]	kWh	179,284,446
	Indirect energy consumption [electricity (grid, DPPA, vPPA), chilled water, steam]		1,016,482,772

Note: Quantities are rounded to the nearest whole number



SA

Lauren Alexander
Lead Verifier
May 14th, 2025

UL Solutions Verification Services, Inc.
333 Pfingsten Road
Northbrook, IL 60062 USA

Nature of Engagement:

UL Solutions was engaged by Gap Inc. to perform an independent verification of the greenhouse gas (GHG) emissions and environmental data statement reported by Gap Inc. for the period of February 1st, 2024, to January 31st, 2025.

Gap Inc. was responsible for the preparation and fair presentation of the GHG emissions and environmental data statement. UL Solutions was responsible for the independent verification of Gap Inc.'s GHG emissions and environmental data statement to a limited level of assurance. At the limited level of assurance, verification activities are less extensive in nature, timing, and extent than activities applied in a reasonable level of assurance.

Verification Standard and Criteria:

UL Solutions conducted the engagement in accordance with ISO 14064-3:2019 and ISO 14016:2020, and applied the criteria set out in ISO 14064-1:2018, the GHG Protocol Corporate Standard.

Scope:

Level of assurance and materiality threshold:

- Limited level
- The verification applied a materiality threshold of 5% for aggregate errors in sampled data

Organizational boundary:

- Global operations
- 3,556 sites (including 1,003 franchises)

Consolidation approach:

- Operational control

Reporting boundary:

- See GHG emissions and environmental data statement on page 1

Period of verification:

- Fiscal year 2024 (February 1, 2024, to January 31, 2025)

Types of GHGs included:

- CO2, CH4, N2O, HFCs

Data Assurance



Verification Methodology

UL Solutions applies a risk-based approach to verification that incorporates an investigation of the inherent and control risks associated with reporting. The activities performed by UL Solutions (below) were based on professional judgement.

- Conducted interviews with relevant stakeholders to understand and evaluate the data management systems, processes used for collecting and reporting on the data, and quality management of the data
- Reviewed supporting documentation and evidence
- Reviewed the processes used to gather and aggregate data
- Reviewed quality management practices
- Tested a selected sample of sites and sources for data completeness and accuracy, including a review of emission factors, unit conversions, and calculation models

Verification Observations:

Gap Inc.'s reported sources of Scope 1 and 2 emissions are from global retail/ outlet locations, offices, distribution centers, and data centers where the company has operational control. Franchises are not included within Gap, Inc.'s operational boundary, but are included within Scope 3 calculations.

Supporting data and information for Scope 1 and 2 GHG emissions consisted of monthly fuel and energy supplier information, and utility invoices, and activity data collected from Gap Inc. site users. In cases where actual data was not available, usage was determined through estimations and gap filling. Note: For refrigerants, actual "lbs. in" and "lbs. out" data were provided to calculate the total refrigerant loss for each type of refrigerant.

Supporting data and information for Scope 3 GHG emissions consisted of mainly actual data (e.g., spend, usage, and transactional-level data), although in some cases, data were estimated (e.g., electric power for Franchises was estimated based on floor area-based energy use intensities).

Gap Inc. utilized publicly available industry standard calculation models, emission factors, unit conversion factors, and estimation methodologies.

Based on the verification activities performed, UL Solutions did not find evidence that the GHG emissions and environmental data statement was not in accordance with the required criteria.

Independence and Impartiality:

UL Solutions is independent from Gap Inc. and its stakeholders in reaching an impartial assurance conclusion. UL Solutions' assurance team has the relevant professional and technical knowledge, and experience to conduct assurance to the ISO 14064 standard. While other divisions of UL Solutions may provide services to Gap Inc., UL Solutions keeps certain activities of its divisions separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, UL Solutions has established policies and procedures to maintain the independence of the team engaged in this project and members of this team did not participate in the preparation of Gap Inc.'s reported values.



DISCLAIMER

No content contained in these materials may be modified, reverse engineered, reproduced or distributed in any form or by any means, either in whole or in part, without the prior written permission of UL Solutions.

The information in this publication should not be relied upon in making, or refraining from making, any investment decisions with respect to a specific company or security, or be used as financial, investment, or legal advice. UL Solutions' conclusions, findings, observations, and other analyses are statements of opinion as of the date they are expressed; they are not statements of fact or recommendations to purchase, hold, or sell any securities or to make any investment decisions. Historical data and analysis should not be taken as an indication or guarantee of any future performance, analysis, forecast or prediction. The materials have been prepared solely for informational purposes based upon information generally available to the public and from sources believed to be reliable. However, no representation is made, or warranty given, in respect of the accuracy of this information. UL Solutions assumes no obligation to update the content following publication in any form or format.

UL Solutions does not guarantee the accuracy, completeness, timeliness or availability of the information. UL Solutions are not responsible for any errors or omissions, regardless of the cause, for the results obtained from the use of the information.

UL SOLUTIONS MAKES NO WARRANTIES OR REPRESENTATIONS, AND, TO THE MAXIMUM EXTENT PERMITTED BY LAW, UL SOLUTIONS HEREBY EXPRESSLY DISCLAIMS ANY AND ALL EXPRESS OR IMPLIED WARRANTIES, CONDITIONS, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE.

In no event shall UL Solutions be liable to any party for any direct, indirect, special, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs) or any other damages in connection with any use of the information/content even if notified of the possibility of such damages.