



GAP INC. HUMAN RIGHTS POLICY

Since Gap Inc.'s founding in 1969, a commitment to respect the dignity of all people and communities has guided our company. We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. We are committed to respecting the rights of our employees and workers in our supply chain, in accordance with the International Labor Organization's (ILO) Core Conventions as set out in the Declaration on Fundamental Principles and Rights at Work, including the freedom of association, the right to collective bargaining, and the right of all individuals not to be subject to forced labor, child labor, or discrimination. We expect our business partners, including suppliers, to adopt and adhere to similar values.

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

GAP
INC.

OLD NAVY

GAP

BANANA
REPUBLIC

ATHLETA

KEY AREAS OF IMPACT

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

WORKING CONDITIONS IN OUR SUPPLY CHAIN

We have a responsibility to respect the human rights of the people who make our clothes. Through our Vendor Compliance program, we seek to ensure that they work in safe, healthy, and fair conditions and that they are treated with dignity and respect. We implement our human rights commitment through our Code of Vendor Conduct and enforce it through our assessment, remediation, capability building, and worker engagement programs at supplier facilities. Through our Code of Vendor Conduct, we expect all our suppliers to commit to respecting the human rights of their workers in the ILO's Declaration on Fundamental Principles and Rights at Work, including the freedom of association, the right to collective bargaining, and the right of all individuals not to be subject to forced labor, child labor, or discrimination. Through these programs, we consult directly with workers to better understand and address their concerns and priorities.

We recognize our responsibility to engage with our business partners to address and remedy adverse impacts and seek to build their capacity to respect human rights through training and engagement. Workers have freedom to select their grievance redress system, and we commit to collaborating with all appropriate mechanisms to provide access to remedy. To help address the most complex and pressing human rights challenges, we partner with our peers in collaborative initiatives such as ILO's Better Work Program, the Sustainable Apparel Coalition, and the UN Global Compact.

THE RIGHTS OF OUR EMPLOYEES

Our goal is to embed human rights in all aspects of our business. All our employees around the world deserve to be treated with dignity and empowered to reach their full potential. We have a responsibility, individually and collectively as Gap Inc. employees to work with purpose, uphold our deep commitment to act and lead with integrity, and follow relevant laws, regulations, and company policies. Our [Code of Business Conduct \(COBC\)](#), which includes provisions on salient human rights issues such as zero tolerance for discrimination, harassment, and retaliation sets forth these responsibilities in detail. All employees worldwide receive access to the Code when they join the Company, agree in writing to comply with it, and are required to complete an overview training course.

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. We are committed to ensuring our workforce is as inclusive as our customers and the communities we serve, and that we foster a culture where everyone feels valued, respected, and equipped with the tools and access they need to reach their full potential.

WOMEN'S EMPOWERMENT

We aim to foster better working conditions for factory employees, with a focus on bridging the equity gap for women internationally. The majority of workers in the apparel supply chain are women and, as such, our international programs focus on women's empowerment. To realize our commitment, we implemented the [P.A.C.E.](#) (Personal Advancement & Career Enhancement) and RISE (Reimagining Industry to Support Equality) programs which work to provide women with the opportunity to gain skills and confidence to advance at work and in life.

GOVERNANCE

While human rights are the responsibility of all of us at Gap Inc., executive oversight and responsibility for the implementation of this policy rests with our Global Sustainability team led by the Chief Supply Chain and Transformation Officer. The Governance and Sustainability Committee of the Gap Inc. Board of Directors oversees implementation of this policy at the board level. The Committee meets at least four times per year to review and evaluate company programs, policies, and practices relating to social, human rights, and environmental issues and impacts to support the sustainable growth of the company's businesses. The Global Sustainability team, in partnership with the Vendor Compliance team, is responsible for the implementation of the commitments in this policy.

IMPLEMENTATION

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

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

[Gap Inc's COBC Speak Up hotline](#) is available to anyone who conducts business with or is an employee of Gap Inc. to raise concerns about potential violations of our Code of Business Conduct. Any concerns are addressed using a robust internal process, and we regularly update our policies and practices based on our findings. At the factory level, we require facilities to provide a confidential and anonymous channel for workers to express grievances without fear of retaliation. We also support worker committees where grievances can be expressed, and we check that they are present through our Vendor Compliance assessment program.

Richard Dickson, President and Chief Executive Officer, Gap Inc.