

GAP INC.

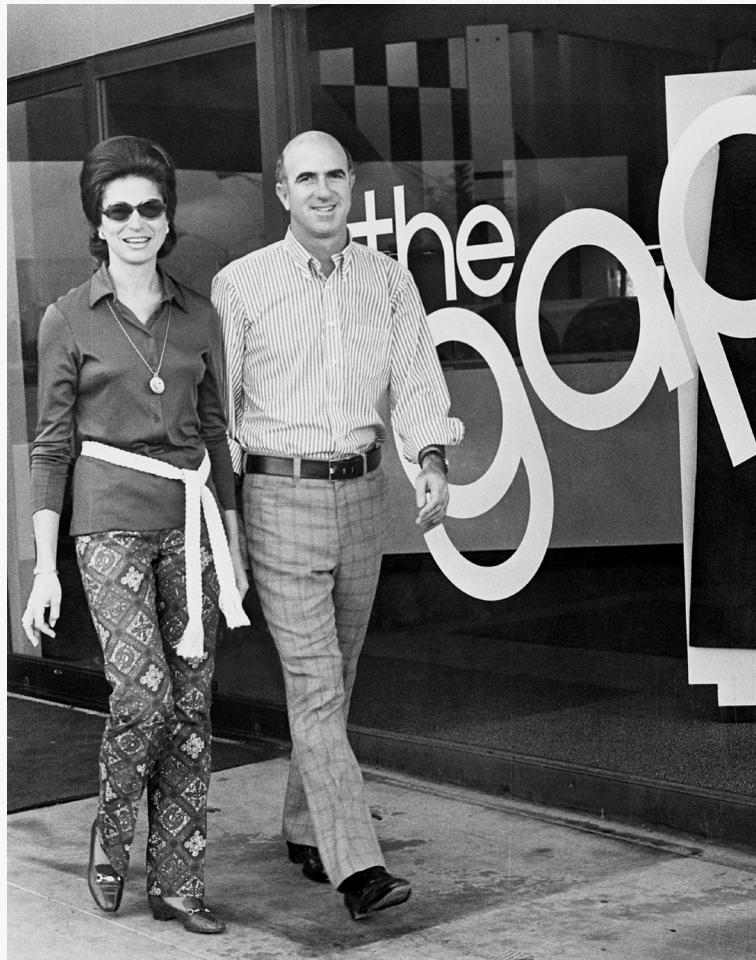
# Do what's right.

OUR GLOBAL CODE OF  
BUSINESS CONDUCT



## Do what's right.

Our vision to become a high-performing house of iconic American brands requires us to be laser-focused on how we go about delivering products and experiences that create authentic human connection. When Doris and Don Fisher opened the first Gap store in 1969, they made a deep commitment to integrity and maintaining the highest standards in doing business. This is our proud legacy and the road map to bridging gaps to create a better world.



While a lot has changed since then, our commitment to upholding ethical principles has not wavered. Throughout our history, operating with integrity has been key to our success, and it continues to be a part of everything we do, from embracing a purpose-driven mindset to celebrating the best of who we are.

Creating at the speed of culture demands that we make smart, ethical business decisions in every situation. Our purpose and values drive the behaviors that allow us to imagine better. Our Global Code of Business Conduct builds upon those behaviors, guiding us to act and lead with integrity.

We are writing a new future for Gap Inc. and are reclaiming our status as a cultural icon. That is why we have reimagined our Code — to support our endeavor to bridge gaps while overcoming challenges as one team, one company — and we do this not just because it is legally required, but because it is the right thing to do.

As one team, we all have a responsibility to follow our Code, so I ask you to read this carefully and to think deeply about how our everyday actions affect our company, our shareholders, our customers and our communities. If the time comes when you are not sure about the right action to take, ask for guidance from any of the resources that are listed in this Code, and report any concerns or potential violations of the Code as soon as they arise — without exception. It is by holding each other accountable that we continue to energize our culture.



Together, we're building a vibrant community where connection, creativity and collaboration push us further — doing what's right amplifies our impact and our perpetual desire to imagine better.

Onward!

Richard

“We do our best to lead by example,  
not because others are watching but because  
it’s the right thing to do.”

—Doris Fisher

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**Disclaimers (see \* throughout document).** Gap Inc. supports the right of its employees to speak out publicly on matters of public concern. Additionally, you are not prohibited from disclosing or discussing the terms and conditions of your employment, including wages, benefits, working conditions or other issues in connection with activities protected by applicable law, including but not limited to the National Labor Relations Act. Nothing in this Code or in any Gap Inc. policy is intended to limit or interfere with any rights that Gap Inc. employees may have under the U.S. National Labor Relations Act or applicable law.

Your rights as an employee and our rights as an employer are governed by the laws of the country of employment and the work rules at your location.

This Code does not constitute an employment contract nor any form of legal contract and may be changed by Gap Inc. at any time.



## Speak Up

Our Code of Business Conduct (COBC)  
Speak Up  
Zero Tolerance for Retaliation  
Open Door Policy

## Our Code of Business Conduct (COBC)

### 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 Mission

We create products and experiences that inspire people to connect through authentic self-expression.

### Our Values

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



### Why it matters.

At Gap Inc., we all share a responsibility to act with integrity, work with purpose and think carefully about the impact our decisions may have on others, our company and ourselves. This Code of Business Conduct (COBC) builds upon our company's values and is your guide to acting ethically, working with integrity and following relevant laws, regulations and company policies.

This COBC demonstrates our commitment to ethical behavior, transparency and accountability. By adhering to rigorous ethical standards, we build credibility, mitigate risks and enhance operational excellence — ensuring strengthened community connections and sustained value for our customers and shareholders.



### Questions

We are here to support you.

If you need guidance on any topic covered in this COBC, contact [Global Integrity](#).

## Your responsibilities.

As a Gap Inc. employee, you are expected to:

**FOLLOW OUR COBC AND POLICIES.** Review and follow our COBC and related company policies and know what policies apply to your work. In each section of this COBC, there are links to detailed policies that you are responsible for reviewing, understanding and following. When you have questions, be sure to ask for additional guidance from your manager or [Global Integrity](#). Failure to follow our COBC and policies may result in discipline up to and including termination.

**FOLLOW APPLICABLE LAWS.** Follow all applicable laws in the places you work. If a law, local rule or local business practice conflicts with our COBC, always follow the higher standard.

**CONTRIBUTE TO A CULTURE OF INCLUSION AND BELONGING.** Be mindful of how your actions and decisions impact others. Create an inclusive environment where all people feel valued, supported and respected.

**ACT WITH FAIRNESS AND HONESTY.** Protect Gap Inc.'s reputation by dealing fairly and honestly with customers, suppliers, vendors, competitors and fellow employees.

## Managers' Responsibilities.

Managers play a special role in maintaining our ethical culture, so they have additional responsibilities.

- Model our values and support open communication. Encourage employees to speak up with questions and concerns.
- Report misconduct and take prompt action where appropriate.
- Remind employees that we have [Zero Tolerance for Retaliation](#).
- Periodically review the COBC and relevant policies with your team.
- Make sure you and your team are up to date on all required training courses.
- Reach out to [Global Integrity](#) when you have questions.

## Ask questions and Speak Up.

If you find yourself in a situation where you are not sure what to do, ask yourself:

Does this follow our COBC, our policies and the law?



Am I authorized to do this?



Could this damage Gap Inc.'s reputation?



Would I want to see this reported in the media?



Is this the right thing to do?

 Not sure? Ask for help by contacting one of our [Speak Up resources](#).

 No? Don't do it.

# Speak Up

We are all responsible for protecting Gap Inc. If you believe there has been a violation of our COBC, policies and/or the law, you are expected to Speak Up. The following Speak Up resources are available to you:

- Follow the [Open Door Policy](#) and speak with your manager, next level manager or local Human Resources contact.
- Contact [Global\\_Integrity@gap.com](mailto:Global_Integrity@gap.com).
- Use the confidential [COBC Speak Up Hotline](#):
  - Submit an online report: [speakup.gapinc.com](http://speakup.gapinc.com) or
  - Call 1-866-GAP-CODE (1-866-427-2633)
  - Outside North America and Puerto Rico: Refer to [speakup.gapinc.com](http://speakup.gapinc.com) for more information.

Our confidential [COBC Speak Up Hotline](#) is available around the world 24 hours a day, 7 days a week, with the option to submit your report anonymously if you wish.

Gap Inc. investigates every report appropriately and takes fair and necessary action on any substantiated violations of the COBC, our policies and/or the law.

## Zero Tolerance for Retaliation.

Gap Inc. does not tolerate retaliation against anyone who reports a concern in good faith or cooperates with or participates in an investigation. “Good faith” means that you honestly believe that a violation has taken place.

Managers are prohibited from taking adverse employment action against an employee for raising a COBC, policy or legal concern. A few examples of adverse employment action are a demotion, pay decrease, termination, reassignment or failure to promote.

Any employee who engages in acts of retaliation will be subject to disciplinary action up to and including termination of employment.

If you believe you have been the subject of retaliation or have observed retaliation either in person or online, report it to your manager, next level manager, your local Human Resources contact, [Global Integrity](#) or the [COBC Speak Up Hotline](#). Every concern will be fairly, promptly and thoroughly investigated, and Gap Inc. will take appropriate action, up to and including termination.



## Open Door Policy.

We are one team, one company and one culture, and we work best when we are working together. We encourage you to share your questions, suggestions or concerns with any level of leadership.

In most cases, your immediate manager is a great place to start. However, you can elevate your questions or concerns to the next level of management or Human Resources at any time.

## Q&A

**Q:** I have seen some conduct that bothers me, but it doesn't seem to be covered in the COBC. I'm not sure it is a violation of our policy. Should I do anything?

**A:** Yes. You can contact any of the [Speak Up resources](#) to discuss your concern. It is always OK to ask questions, and you don't have to describe a specific violation of our COBC to seek assistance.

For more details, refer to: [Open Door Policy](#) | [Zero Tolerance for Retaliation](#)



## Our Work Environment

Zero Means Zero: No Discrimination or Harassment  
Inclusion and Belonging  
Health and Safety

## Zero Means Zero: No Discrimination or Harassment

### Why it matters.\*

We have ZERO TOLERANCE for discrimination, harassment, bullying or retaliation.

At Gap Inc., every voice is essential. Because of this, we are committed to fostering a culture where everyone feels valued, respected and empowered to reach their full potential. We listen to each other, find common ground and live our values in order to build collaborative teams.

### Your responsibilities.

**WORK WITH A ONETEAM APPROACH.** Be open to all people, ideas and ways of working — never engage in harassment, discrimination or retaliation. Offensive comments, unwelcome advances or any form of harassment will not be tolerated.

**MAKE FAIR DECISIONS.** All employment-related decisions such as hiring, training, advancement, compensation, scheduling, discipline and termination are to be made based on skill, experience and performance and never on an individual's protected category or status.

**SPEAK UP.** If you experience, believe you have experienced or observe harassment, discrimination or retaliation, speak up! Reports will remain confidential if possible and can be made to your manager, next level manager, local Human Resources contact, [Global Integrity](#) or the [COBC Speak Up Hotline](#).



## What are protected categories?

Protected categories include race, ethnicity, color, age, sex, gender, gender identity, gender expression, sexual orientation, religion, creed, marital status, pregnancy (including childbirth or related medical conditions), national origin/ancestry, citizenship, physical/mental disability, genetic information, medical condition, veteran status or military status.

## What is sexual harassment?

Sexual harassment can include:

- Unwanted sexual advances or propositions
- Offering career advancement in exchange for sexual favors
- Threatening unfavorable employment action against an individual who rejected sexual advances
- Graphic sexual language, lewd remarks and jokes
- Photographs, graphics and other written materials of a sexual nature
- Abusive, degrading or sexually suggestive comments or messages
- Offensive gestures
- Unwelcome requests for sexual favors or dates
- Unwelcome physical contact, such as touching, assault and impeding or blocking movements

Conduct of this nature is prohibited at Gap Inc., as is displaying graphic material or using email, text messages, social media or other digital means to harass or distribute sexually suggestive or offensive comments, jokes, requests or other communication.

## What is harassment?

Unlawful harassment is unwelcome conduct that creates an intimidating, hostile or offensive environment by targeting an individual's protected category. This behavior can include physical, verbal, written, electronic or online/social media behavior.

Examples of verbal harassment include epithets, slurs, insults, jokes, offensive remarks and teasing because of or focused on a person's protected category.

Nonverbal harassment may be in electronic or any other form and can include the distribution, display or discussion of any posters, photographs or graphic material that ridicules, unfairly criticizes, insults, belittles or shows hostility, aversion or disrespect toward an individual because of the protected category to which they belong.

For more details, refer to: [Zero Means Zero: No Discrimination or Harassment Policy](#) | [Zero Tolerance for Retaliation Policy](#)

## Q&A

**Q:** My manager plays music in our workplace that one of my co-workers finds offensive, but she doesn't want to cause any trouble by reporting her concern. Should I respect her wishes or report the behavior?

**A:** You should promptly report any behavior that violates our COBC or our policies. You may seek assistance from any of the [Speak Up resources](#) listed, including your manager, next line manager, local Human Resources contact, [Global Integrity](#) or our [COBC Speak Up Hotline](#).

**Q:** One of my co-workers makes jokes about women. I told her that I think the jokes are offensive, but she says that because she is a woman herself, she can make these jokes. Is there anything I can do?

**A:** Yes. You should report this behavior to your manager or one of the other [Speak Up resources](#). Gap Inc. does not tolerate inappropriate jokes or offensive comments in our workplace.

**Q:** A co-worker tells me about his sexual activities and asks me inappropriate questions about my sex life. It makes me uncomfortable, but he hasn't asked me out on a date or touched me. Is this behavior against our policy?

**A:** Yes. Any behavior that includes an unwanted discussion about sexual behavior is inappropriate and violates our COBC and our policies. You should report this behavior to your manager or one of the other [Speak Up resources](#).

## Inclusion and Belonging



### Why it matters.

At Gap Inc., we are committed to building a stronger sense of belonging across employees, customers and communities. Inclusion and belonging have been integral to our business approach since we opened in 1969. We believe that when you make inclusion an imperative, it closes the gaps between us and opens a world of possibilities.

### Your responsibilities.

EMBRACE THE SPACE BETWEEN US. Foster an environment where everyone feels they belong and are equipped with the resources to reach their full potential. Listen to others and find common ground. Remember that every person you work with has a stake in our shared success, and every contribution to our collective work matters.

## Q&A

**Q:** As a people leader, how can I actively design an inclusive workplace for my team and signal that it is a priority for me as a leader?

**A:** Remember that while our values provide focus for everything we do, our values-based leadership behaviors guide how you show up every day. Consider how things look from your team's perspective. Listen with an open mind. Embrace differences and recognize that those differences are what spark creativity and innovation. Honor team members' contributions. Cultivate a trusting environment by increasing your self-awareness, relating to others with curiosity and empathy and asking for feedback. Your team will know that this is a priority for you when they see you put these behaviors into action.

**Q:** I believe in inclusive teams and want everyone to feel that they belong at Gap Inc., but I am not a manager. What can I do to foster inclusion and belonging?

**A:** We all have a role in supporting inclusion and belonging at Gap Inc. Every employee can express, model and reinforce inclusive behaviors that empower others to reach their potential. You can do this by seeking out other opinions and perspectives, giving praise to acknowledge good work, showing gratitude when you've been helped, collaborating with others and not leaving co-workers out of the loop. Remain self-aware, and always consider the impact that your actions or words may have on others.

Whether you are a people leader or individual contributor, you can always reach out to your manager or HR for additional support.

## Health and Safety

### Why it matters.

We are committed to providing a safe and healthy environment for all employees, customers, vendors and other third parties.

### Your responsibilities.

We take a rigorous approach to safety, including store and warehouse design and layout. Not all risks can be eliminated, so we use sound engineering controls, worker education, personal protective equipment and safety policies and procedures to reduce risks in the workplace.

**STAY SAFE.** A safe workplace is a positive and productive workplace. It is your responsibility to report hazards, speak up about any unsafe conditions and follow safety policies, procedures and protocols at all Gap Inc. locations. Any threats of violence or intimidation are taken seriously and must be reported immediately.

Gap Inc. has **ZERO TOLERANCE FOR WORKPLACE VIOLENCE**. Any act or threat of physical violence, including intimidation, harassment and/or coercion by any employee or nonemployee that involves or affects our employees, the company or company property, or creates an abusive or unsafe work environment, will not be tolerated and is expected to be reported immediately.

**FOLLOW THE RULES.** It is expected that all employees work to actively prevent and promptly address injuries and follow our incident investigation and reporting processes.

Vendors and third parties are expected to comply with the [Gap Inc. Code of Vendor Conduct](#) and relevant environmental laws and regulations, manage their energy use and water impacts and actively protect against human rights abuses.



**WORK DRUG AND ALCOHOL FREE.** Consuming drugs or alcohol can impair your judgment and your ability to work safely. While at work or conducting Gap Inc. business, you are strictly prohibited from possessing, transferring, buying, selling or using (unless prescribed by a health care provider) any substance that may impair your judgment, including but not limited to alcohol, cannabis, controlled substances and illegal drugs. Consuming or possessing alcohol during work hours and/or on Gap Inc. premises is only allowed if you are of drinking age and attending an approved company-sponsored function.

**REPORT IT.** All unsafe conditions or hazards discovered in the workplace must be immediately reported to your manager, the Risk Management Safety Concerns Hotline (1-800-333-7899 x73330), the Risk Management department or any of the [Speak Up resources](#). Employees will NOT be disciplined for reporting unsafe workplace conditions.

For more details, refer to: [Workplace Violence Prevention Policy](#)  
[Code of Vendor Conduct](#) | [Risk Management & Safety](#)

## Q&A

**Q:** One of the exterior doors at the rear of my store does not stay open, and we sometimes have to prop it open when we are using it. Is this a problem?

**A:** Yes. We want to maintain a safe environment at all times, so you should report any hazard, such as a broken door or piece of equipment, to your manager, Risk Management department or one of the [Speak Up resources](#).



## Conflicts of Interest

Conflicts of Interest  
Gifts and Entertainment

## Conflicts of Interest

### Why it matters.\*

We work tirelessly to maintain and protect our company's reputation. Part of that work includes making sure that personal interests, actions or situations do not conflict or compete with the interests of Gap Inc., compromise your judgment or influence your business decision-making.

Remember that even the *appearance* of a conflict can damage Gap Inc.'s reputation.

### Your responsibilities.

**WATCH FOR CONFLICTS.** Be aware of situations where your personal interests or the interests of those close to you could conflict with the interests of Gap Inc. Never use your position at Gap Inc. to advance your own interests or the interests of friends and family.

**UNDERSTAND OUR POLICIES.** Be familiar with our policy on [Conflicts of Interest](#) and your disclosure responsibilities.

**DISCLOSE.** When you become aware of a potential conflict, raise the issue immediately with your manager, Human Resources or [Global Integrity](#). Most often, potential conflicts can be resolved with open and honest communication.



## Q&A

**Q:** Several of the people I supervise get together regularly for social events, and they have invited me to join. Is this OK?

**A:** Yes, but you must use good judgment and be mindful of how personal relationships can create actual or perceived conflicts of interest. As a manager, you must remain fair and impartial, and you should not engage in activities that can compromise your decision-making.

**Q:** I am dating a co-worker. Since neither one of us supervises the other, there is no issue with our relationship, correct?

**A:** It depends. Intimate or close relationships in the workplace can potentially have a negative impact, so you should avoid open displays of affection, arguments, favoritism or any other conduct that could create an uncomfortable or unprofessional environment. Also, be sure to report your relationship to your manager and local Human Resources.

**Q:** I have received an offer to work for a consulting firm that is associated with one of Gap Inc.'s vendors. The new role would be after hours and would not affect my role at Gap Inc. Is it OK to accept?

**A:** It depends. Opportunities associated with suppliers, vendors, competitors or landlords of Gap Inc. must have written approval from the Chief Legal and Compliance Officer.

## Common conflicts of interest:

- **GIFTS AND ENTERTAINMENT:** Refer to the section below and our [Gifts & Entertainment Policy](#).
- **HIRING FAMILY AND FRIENDS:** Consult with your manager before hiring or doing company business with a relative, friend, spouse or partner. Prior approval is required if the person will be in your chain of command. Members of the Senior Leadership Team should consult with [Global Integrity](#).
- **PERSONAL RELATIONSHIPS AT WORK:** Gap Inc. respects your right to pursue personal relationships with co-workers, but these relationships cannot negatively impact the work environment, your job performance or your ability to supervise others. If you are related to, dating, living with or romantically involved with someone and you have control or influence over their conditions of employment (such as salary and schedule), disclose this to your manager immediately *even if they do not report directly to you*.
- **WORKING OUTSIDE OF GAP INC.:** You are required to get the approval of your manager before working outside of Gap Inc., including operating your own business or online shop. Additional approvals are required before working for any Gap Inc. supplier, vendor, competitor or landlord.

*Exception:* If you work in a store or distribution center and do not supervise others, you are pre-approved for outside work so long as it does not interfere with your Gap Inc. responsibilities or schedule.

- **BOARD SERVICE:**

- *For-profit organizations:* Pre-approval from [Global Integrity](#) is required before serving as a director or officer of any for-profit company. Complete the [Employee Board Service-Approval Form](#) and email it to [Global Integrity](#).
- *Non-profit organizations:* Gap Inc. understands you may want to serve as a director, trustee or officer of a non-profit organization on your own time. If you are representing Gap Inc., you are required to have your manager's approval and to inform [Global Integrity](#).

**SPEAK UP.** If you have questions about a potential conflict of interest or need guidance, reach out to [Global Integrity](#).



Learn more: [Conflicts of Interest Policy](#) | [Board Approval Process](#)

## Gifts and Entertainment



### Why it matters.

Relationships are at the core of who we are. The occasional exchange of modest gifts and entertainment with Gap Inc.'s current or potential business partners can help strengthen those relationships, but these exchanges can also appear to influence business results. It is important to make sure there is no question about the integrity of our decision-making.

### Your responsibilities.

**STAY WITHIN THE LIMIT.** Gifts may be offered, given or accepted so long as the value does not exceed \$150 USD from each source per year. The exchange of cash or cash equivalents, such as gift cards, is prohibited. Certain departments may have lower limits, so check with your manager if you are unsure.

**ACCEPT ONLY REASONABLE, PRE-APPROVED ENTERTAINMENT.** Entertainment can only be accepted if it is directly connected to a legitimate business purpose. It must be reasonable and appropriate in the context of the business occasion and your role at Gap Inc. and cannot have the appearance of improper influence. The vendor or business partner paying for the entertainment must also be in attendance. All requests to accept entertainment must be approved by a department Senior Vice President (SVP) or above. Notify [Global Integrity](#) by email prior to the event and include a copy of the approval. See the Gap Inc. [Conference and Third-Party Training Policy](#) for details on accepting offers to attend conferences and third-party trainings.

**DO NOT REQUEST GIFTS OR ENTERTAINMENT.** Never ask for gifts, meals, entertainment or anything of value from third parties or vendors.

**GET APPROVAL.** Any gift valued at over \$150 USD can only be accepted if it is pre-approved by [Global Integrity](#) and meets one of our limited exceptions.

**SPEAK UP.** If you have questions about whether a gift, meal or entertainment is appropriate or would like pre-approval to accept an offer, contact [Global Integrity](#).

### What is a gift?

A gift can be anything of value and can include items, meals, vacations or networking trips, charitable donations, loans, favors and other benefits.

## Q&A

**Q:** A prospective vendor has given me her four tickets to an event tonight since she cannot attend. I will not be making the decision about whether we use her company as a vendor, so is it OK for me to accept and use the tickets?

**A:** No. You can only accept the tickets and attend the event if the prospective vendor will be present and it is connected to a legitimate business purpose. In addition, if the vendor were attending the event, you would need to ensure that the entertainment is reasonable and appropriate in the context of the business occasion and your position at Gap Inc. and have prior written approval from your department SVP or above. You must also notify [Global Integrity](#) before attending the event.

**Q:** I work remotely, and a vendor sent a holiday gift basket worth over \$150 USD to my home address. What should I do?

**A:** If you occasionally work from a Gap Inc. location, bring the gift basket to that location to share with co-workers. If that is not possible, you should return the gift to the vendor and politely explain our policy. If you cannot return the gift, you can donate it to a local charity.

## What is business entertainment?

Business entertainment can include meals or events such as sports competitions, concerts or other outings so long as the supplier or business partner offering the gift is present for the entertainment. The business entertainment must be reasonable and appropriate in the context of the business occasion and your position at Gap Inc. All requests to accept business entertainment must be approved in writing by your department SVP or above. Notify [Global Integrity](#) by email prior to the event and include a copy of the approval.



## Exceptions to our \$150 USD gift limit:

- As long as they are infrequent and not extravagant, business meals are not considered gifts or entertainment and may be accepted. However, it is critical that any business meal does not create a sense of obligation or result in favored treatment with a vendor or business partner.
- Non-cash holiday gifts can exceed the gift limit if they are shared with your department.
- Registration fees for conferences and industry training events that are paid for by a vendor are acceptable so long as it does not create a conflict of interest or the appearance of a conflict of interest and does not violate any other provision of this COBC. You must obtain written approval in advance from your director or above and [Global Integrity](#). All other travel, lodging and related expenses must be covered by Gap Inc. For additional information, including limited exceptions, see the Gap Inc. [Conference and Third-Party Training Policy](#).

For more details, refer to: [Gifts & Entertainment Policy](#) | [Conference and Third-Party Training Policy](#)

## Q&A

**Q:** A vendor who works with our company has offered the free use of their vacation rental in Florida for my sister who is traveling there for a week. Since this is not being offered to me, is this OK?

**A:** No. There is no business justification for this offer, so it cannot be accepted. Additionally, offers of gifts, including the free or discounted use of facilities, to you or members of your family, could be viewed as having an improper influence on your business decision-making.

**Q:** A vendor has asked me to speak on a panel they're sponsoring at an industry event. They have offered to pay for all related expenses, like travel, lodging, meals and registration. Can I accept the supplier's offer to pay all related expenses?

**A:** Not exactly. First you need to request pre-approval and follow the process outlined in the [External Speaking Policy](#) to participate on the panel. Then you need to request pre-approval from your director or above and [Global Integrity](#) for the vendor to pay your registration fees. All other expenses must be paid for by Gap Inc. unless the request meets one of our limited exceptions as outlined in the policy.

**Q:** Our team includes a group of Gap Inc. employees and contractors. Each Friday, we go to a local happy hour, and one of the contractors always picks up the tab. Is this appropriate?

**A:** No. It is unlikely that this follows our rules or has a legitimate business purpose. If it is recurring, it is well over the \$150 USD threshold and does not meet the criteria for an exception for business entertainment.



## Data, Assets and Property

Confidential Information and Intellectual Property  
Privacy  
Information Security  
Property and Assets  
Recordkeeping

# Confidential Information and Intellectual Property

## Why it matters.\*

Protecting Gap Inc.'s confidential information is key to our success. Failure to safeguard this information could harm our reputation, disrupt our business and lead to legal liability.

## Your responsibilities.

**KEEP IT SAFE.** If you have access to or the ability to access Gap Inc.'s confidential information, you are responsible for protecting and securing that information from improper disclosure or misuse.

**THINK BEFORE YOU SPEAK.** Casual or unintentional disclosure of confidential information can happen, so it is important to:

- Be vigilant when communicating externally or internally.
- Never discuss confidential information with those who don't have a business need to know or authorization to access the information.
- Avoid discussing confidential information in public places.
- Always ensure software, images and other materials are appropriately licensed. Avoid using pirated or unauthorized content, as this can lead to legal consequences for both you and Gap Inc.

**FOLLOW OUR RULES.** All confidential information must be accessed, used, shared and stored in a manner consistent with Gap Inc. policies and procedures. If you believe you have a business need to share confidential information outside the company, you must receive prior approval from Legal.

**SPEAK UP.** If you have questions or concerns about confidential information, including what information or materials can or cannot be shared, reach out to your manager, Legal or one of the other [Speak Up resources](#) for guidance. If you suspect the unauthorized disclosure of confidential information, please report it immediately to Information Security or the [COBC Speak Up Hotline](#).



## What is confidential information?

Confidential information includes non-public information about the company or third-party business partners. Examples include unannounced product information and designs, business or strategic plans, unannounced marketing plans, pricing and promotional strategies, customer data, vendor data, non-public sales and profit data, financial data, intellectual property and information about security practices, real estate and matters in dispute resolution.



## What is intellectual property?

Intellectual property can include brands and designs, trade secrets, trademarks and copyrighted materials such as books and films, inventions, software and other types of property. Our trademarks, including Athleta, Banana Republic, Gap and Old Navy, are very valuable assets that we must protect.

## Report counterfeits and unauthorized use of our trademarks.

If you have information or concerns about the sale of counterfeit merchandise or the unauthorized use of Gap Inc.'s trademarks or brands, including vendors improperly distributing or "selling off" our merchandise, please immediately reach out to the Legal Department's Brand Services team.

For more details, refer to: [Open Source Software Policy](#) | [Brand Protection & Counterfeit Products Guidelines](#)

## Q&A

**Q:** The company is finalizing a new partnership with my favorite designer. The public announcement is set for next week, and I'm excited to participate in it. Can I tell a few close friends about it?

**A:** No. Some of our plans may be exciting, but if they are not public, they cannot be shared. You should never share non-public or confidential information with anyone who is not specifically authorized to know it.

**Q:** There is an application on our store tablets that I think would be really helpful for my niece, but it doesn't appear to be available anywhere. Is it OK if I copy it?

**A:** No. To respect intellectual property laws, including software copyrights, Gap Inc. does not allow anyone to make copies of intellectual property belonging to us or any third party without proper licenses or authorization.

**Q:** I've been contacted by a research firm to discuss the retail sales market with their client for an hour, and they have offered to pay me a fee. Can I participate?

**A:** It depends. Participating in interviews with research firms can easily put you in a position where you might be asked for or accidentally provide confidential information. This type of situation can also create a potential conflict of interest, so be sure to follow the disclosure requirements found in the [Conflicts of Interest Policy](#).

## Privacy



### What is personal information?

Personal Information is any information relating to an identified or identifiable individual. Personal information can be a single piece of information that either directly identifies an individual — like a name, email address or phone number — or when combined with other information, indirectly identifies them or makes them identifiable — like an IP address, device ID or marketing identifier.

Some personal information is considered more sensitive than other personal information and is subject to stricter protections due to the potential impacts associated with its exposure or misuse. Examples of sensitive personal information include account login credentials, credit card information, SSN, racial or ethnic origin, religious beliefs, criminal offenses and information about an individual's health or sexual orientation.

### Why it matters.\*

We use personal information every day to engage with customers, manage our workforce, conduct business operations and comply with our legal obligations. Earning and maintaining this trust is paramount to our business. We are committed to following the privacy laws that apply to the jurisdictions where we do business, as well as our own internal policies and standards.

### Your responsibilities.

EXERCISE CARE AND CONFIDENTIALITY WHEN HANDLING PERSONAL INFORMATION. All employees are expected to gather, use, disclose and secure personal information in line with applicable privacy laws and internal privacy policies by:

- Processing personal information lawfully, fairly and in a transparent manner.
- Collecting only the personal information that is necessary for business purposes.
- Using personal information only for intended and disclosed business purposes.
- Keeping personal information accurate.
- Not storing personal information for longer than needed. Refer to the [Corporate Records & Information Management \(RIM\) Policy](#) for guidance.
- Ensuring personal information is appropriately secured.
- Being accountable for privacy compliance.

SPEAK UP. If you have questions or concerns, contact Privacy. If you become aware of an actual or suspected situation that involves the unauthorized disclosure or handling of personal information, report it immediately by contacting Information Security.

For more details, refer to: [Data Protection Policy & Practice Guide](#)

## Q&A

**Q:** My former teacher came into my store last week, but we did not get a chance to speak. I would really like to reconnect with her, so is it OK for me to retrieve her email address from our customer information records?

**A:** No. You should not access customer information for personal use. All customer information we collect must be properly handled and used only for intended and disclosed business purposes.

**Q:** I have been working with a potential new vendor to help with a customer email campaign we need to launch. Is it OK for me to go ahead and send them our customer data to get them started?

**A:** No. You cannot send customer data to the vendor yet. The vendor onboarding process should be followed. If they will be handling personal information, you must also ensure there is a legitimate business need to disclose the data, obtain the necessary internal approvals, and comply with our [Data Protection Policy & Practice Guide](#).

## Information Security



### Why it matters.

Our systems and networks need to remain secure and protected from unauthorized access so we can conduct business and provide uninterrupted services to our customers. While our Information Security team maintains a cybersecurity program to identify and respond to threats, we all play a role in protecting our systems.

### Your responsibilities.

Data breaches and cybersecurity incidents can happen in many ways, including by losing your laptop, sharing passwords, connecting to an unsecured Wi-Fi network and downloading malicious software.

**LOCK IT UP.** Never share your passwords or your login credentials with others. Maintain physical control of your laptop and other devices to avoid loss or unauthorized use.

#### USE CAUTION.

- Beware of emails from suspicious or unknown parties. These may be phishing attempts or may contain files that can cause harm to our systems. Report any suspicious emails to [reportphish@gap.com](mailto:reportphish@gap.com).
- If you join a public network, make sure your connection is secure by first connecting to Global Protect VPN before accessing any Gap Inc. digital assets.

**FOLLOW OUR RULES.** Make sure you are aware of all policies and procedures that cover the use of our systems and networks and the safeguarding of personal information.

**SPEAK UP.** Promptly report any actual or suspected compromises or breaches of the integrity, security, confidentiality or availability of company systems, networks, computers or other devices to Information Security. This includes incidents involving any actual or suspected unauthorized access to or disclosure of company information or the personal information of our customers, employees, vendors and third parties associated with the company.

For more details, refer to: [Information Security Policy](#)

### What are our systems and networks?

Our systems and networks include our collaboration platforms like email, Zoom and Microsoft Teams, shared drives, laptops, mobile devices and software applications.

## Q&A

**Q:** My laptop died while I was on a trip to see a vendor, and I forgot my charger. The vendor offered to let me use one of their laptops on their network to access my Gap Inc. shared drive and email. Is this OK?

**A:** It depends. You must be very careful about joining networks, including public Wi-Fi networks, while using our systems, email and shared drives. When in doubt and BEFORE using your credentials on an unknown network, seek guidance from GapTech by calling 866-411-CSSC (2772), x20600.

**Q:** I'm having trouble getting a signal for my personal phone inside the store. Is it OK to download my favorite social media app for use on one of the store's tablets?

**A:** No. Do not download or use unauthorized software applications on Gap Inc. systems and networks.

## Property and Assets

### Why it matters.

Innovation is woven into everything we do and make, so it is important to safeguard Gap Inc.'s property and assets from misuse, damage and theft to minimize financial losses and drive sustainable growth.

### Your responsibilities.

**USE IT PROPERLY.** Use company property only for business purposes. Taking or using Gap Inc. property, including samples, for personal purposes without permission is considered theft.

**KEEP IT SAFE.** Maintain company property and safeguard it from being damaged, stolen or misused. Never use Gap Inc. property for illegal purposes. You are prohibited from any activity that involves theft, fraud, embezzlement or misappropriation of company property.

**MANAGE SAMPLES.** Do not sell or take samples or fixtures for yourself even after they are no longer needed for business use. All samples and fixtures must be disposed of properly as defined in our [Samples and Fixtures Management Policy](#).

**SPEAK UP.** If you have questions or concerns about the use, sale or disposal of company property, discuss it with your manager or one of the other [Speak Up](#) resources.

Learn more: [Samples and Fixtures Management Policy](#)



### What is company property?

Company property includes equipment, merchandise, fixtures, samples and supplies.

## Q&A

**Q:** My store has recently updated some of the furniture, and I would like to take home one of the older pieces that is no longer used. Is this OK?

**A:** No. Fixtures and furnishings that are no longer being used must be donated, sold in a company-authorized sale or disposed of in a manner consistent with our [Samples and Fixtures Management Policy](#).

## Recordkeeping



### What are company records?

A company record is any information in any format that documents the company's activities, transactions or obligations, such as financial reports, contracts, emails and policies. Records often include confidential company information, personal information about our employees and customers and the company's intellectual property. Other examples include time records; payroll records; purchase orders or invoices; expense reports; sales or inventory data; regulatory filings; accounting, tax, financial and banking information and reports; correspondence; research; and information about dispute resolution and insurance.

### Why it matters.

Accurate records are essential to our success. As a public company, it is critical that we disclose and report company information, including our financial results and financial condition, in a full, fair, accurate, timely and understandable way. Additionally, we are required to maintain all company records and information for the specified retention period to ensure records compliance, and then properly dispose of them thereafter.

### Your responsibilities.

**CREATE ACCURATE AND COMPLETE RECORDS.** Even if you do not work in a finance-based role, you may be a recordkeeper. Every employee is responsible for making sure company records and information are clear, truthful, accurate, complete, maintained and disposed of in accordance with our [Corporate Records & Information Management \(RIM\) Policy](#).

**FOLLOW THE RULES.** Follow all policies, procedures and controls regarding the management of records and information; obtain necessary approvals for access, use and disposal and never modify, falsify or misstate information for any reason.

### PROPERLY MANAGE INFORMATION.

- **HOLDS:** If you receive a hold notice from the Legal, Tax or Internal Audit departments for litigation, an audit or a government investigation, you are responsible for properly maintaining the applicable records until the hold has been removed. So long as the hold notice remains active, records and information cannot be disposed of, even if the retention period has expired.
- **HERITAGE DOCUMENTS:** Records and artifacts of historical value should be transferred to the Corporate Archive upon end of use by no later than the end of the retention period.

In all cases, you must never manipulate or alter records. Any disposal of records must comply with our policy.

**SPEAK UP.** Reach out to Corporate Records and Information Compliance with general recordkeeping questions, and report any concerns about the accuracy of company records to [Global Integrity](#) or one of the [Speak Up resources](#).

For more details, refer to: [Corporate Records & Information Management \(RIM\) Policy](#)

## Q&A

**Q:** I forgot to enter my time for one day a few weeks ago, and the timesheet has already been submitted. Is it OK if I go ahead and add that time in the current timesheet since I did work those hours?

**A:** No. It is important that all our records are accurate, so adding false time in the current timesheet would violate our policy and create an inaccurate record. Contact your manager or Human Resources and explain the oversight so that your time is properly recorded and you are properly paid.



## Business and Reputational Risks

- Anti-Corruption and Anti-Bribery
- Fair Competition
- Insider Trading
- Trade Rules
- Public Communications and Social Media
- Artificial Intelligence
- Product Integrity
- Audits and Government Investigations
- Politics
- Human Rights

## Anti-Corruption and Anti-Bribery



### Why it matters.

Open, honest and ethical — this is the way we conduct business. It strengthens our ability to meet and exceed our ambitious goals while protecting Gap Inc.'s iconic brands. All interactions with government officials, third parties and commercial partners must be free from any form of bribery or corruption. This includes any offer or acceptance of kickbacks or other improper payments, even if they appear to be an accepted local practice.

### Your responsibilities.

**DO NOT OFFER OR ACCEPT BRIBES.** It is strictly against Gap Inc.'s policy and the law to directly or indirectly offer or receive anything of value to influence a business decision or secure the company any benefit. Bribery and corruption are crimes that can result in significant penalties for both the company and any individuals involved.

**MONITOR THIRD PARTIES.** Gap Inc. can be held responsible for bribery or corrupt activity of a third party acting on Gap Inc.'s behalf, so you must work with Legal, Indirect Procurement or any other authorized internal partner who requests additional information on new third-party engagements so they can properly identify and assess any potential risks prior to engagement.

**AVOID MAKING FACILITATION PAYMENTS.** Even small payments made to expedite or avoid a routine government function, such as obtaining a permit, violate our policy and the law except for services where a government-issued receipt is provided.

**SPEAK UP.** Do not ignore any potential corrupt conduct. Contact [Global Integrity](#) or one of the [Speak Up resources](#) if you have questions about corruption, bribery or interactions with government officials and third parties.

### What is “anything of value”?

Anything of value means just that — anything that has value, such as cash, gifts, travel, accommodations, meals, entertainment, favors, offers of employment, discounts, donations and any other personal benefit.

## Q&A

**Q:** A customs official at an airport asked me for a \$20 US payment to proceed through the line. The request does not appear to be an official government fee, but I am concerned that I might be delayed if I do not comply. Can I make the payment?

**A:** No. Gap Inc. policy and the law prohibit the payment. Reach out to [Global Integrity](#) if you receive such a request.

**Q:** When working with a government official to expedite a permit approval, they suggested that Gap Inc. donate to a local charity that provides education for local youth. The charity is internationally recognized for their work, so would this donation be acceptable? Is it OK for me to make a personal donation?

**A:** No. Do not provide anything of value to obtain a service or benefit for Gap Inc. even if the source of the funds is personal, including direct or indirect payments to a government official or to any individual or organization suggested by a government official, including reputable charities.



## Who is a government official?

A government official can be anyone who works for a government agency or a government-controlled organization. Examples include domestic or foreign political candidates, party officials, customs officials, safety inspectors and employees of state-owned businesses.

For more details, refer to: [Anti-Corruption & Anti-Bribery Policy](#)

## Q&A

**Q:** It is a local custom to exchange holiday gifts with the local government officials. Is it OK to provide a reasonable gift that meets our [Gifts and Entertainment](#) requirements?

**A:** Only if you have received explicit, written approval from [Global Integrity](#) before providing the gift, and local law and policy permit the government official to receive gifts. Be aware, however, that providing anything of value to a government official could be viewed as an improper attempt to influence decision-making, so it must be clear that the gift is not intended to influence.

**Q:** I have been working to onboard a potential new vendor and have requested ownership and background information required for our due diligence process. The vendor has failed to provide the information, but my manager is eager to finish the onboarding and conduct business with the vendor. What should I do?

**A:** You must complete the anti-corruption due diligence process to ensure that the potential new vendor complies with all our requirements before initiating the business relationship. If your manager is preventing you from following our procedures, seek assistance from another one of our [Speak Up resources](#), including our [COBC Speak Up Hotline](#).

## Fair Competition

### Why it matters.

As champions of excellence, we are committed to conducting business with integrity and in compliance with the competition (antitrust) laws of the United States and other countries where Gap Inc. does business.

### Your responsibilities.

**EXERCISE CAUTION.** Always protect our confidential information and avoid speaking with competitors about specific competitive details such as prices, marketing practices, production plans, market allocation or geographic regions, franchisee and distributor arrangements and other competitors or vendors. Do not make statements about eliminating competitors or otherwise dominating a market or make arrangements with our competitors that could interfere with fair competition.

**TAKE CARE AROUND DISTRIBUTORS OR FRANCHISEES.** Be mindful that many countries make it illegal to set resale prices or make other deals with distributors or franchisees.

**KNOW THE RULES AND SPEAK UP.** Violating fair competition laws can result in eroding stakeholder trust, significant monetary damages and even criminal penalties, so it is important to understand our [Competition Law Policy](#) and relevant laws.

Consult with [Global Integrity](#) before attending competitor meetings, trade shows and other events that involve competitors and before interacting with distributors and franchisees. Be sure to contact one of our [Speak Up resources](#) if you have any questions or concerns about anti-competitive behavior.

For more details, refer to: [Competition Law Policy](#)



## Q&A

**Q:** At a recent trade show, a competitor asked me about our production plans for the coming year. I did not reply. She then started telling me about her company's plans. Since I didn't say anything about Gap Inc., did I handle this the right way?

**A:** It is important that you are prepared for interactions with competitors and make sure you do not reveal any competitive information, so you were right to avoid speaking about Gap Inc.'s plans. If you are told about or overhear a discussion about another company's plans, contact [Global Integrity](#) as soon as you can with the details of the conversation.

# Insider Trading



## Why it matters.

As an employee of Gap Inc., you may become aware of important company information before it is available to the public. This information is called “material information” because it can influence a decision to buy or sell company stock. Trading on material information before it has been made public, also called “insider trading,” or providing another person with inside information, is not only unethical but also a crime that comes with severe consequences including both civil and criminal penalties.

## Your responsibilities.

**TRADE ETHICALLY.** Do not use or share material, non-public information or “inside” information to make decisions on whether to buy or sell any company’s stock. When such information has not been made public, you and others cannot trade any Gap Inc. securities or any other company’s stock or securities based upon that information.

**KEEP IT QUIET.** Do not tip off others inside or outside Gap Inc. or provide material, non-public information that someone else could use to trade any company’s stock. Be careful with confidential information, and share it only with those who are authorized and have a business need to know it. Once material information has been fully disclosed to the public for a sufficient time, you can trade in the company’s stock.

**FOLLOW OUR RULES AND THE LAW.** Insider trading violates our policies and the law. The U.S. Securities and Exchange Commission and similar agencies are authorized to bring a civil lawsuit against anyone who trades on inside information or who provides another person with inside information. Insider trading is also a crime subject to criminal penalties.

It is not always clear what information is considered material, so if you are unsure whether the information has been released to the public, contact Global Equity Administration before trading.

**SPEAK UP.** If you have questions or suspect violations of our [Insider Trading Policy](#), contact Global Equity Administration and Legal or the [COBC Speak Up Hotline](#).

Learn more: [Insider Trading Policy](#) | [Disclosure Policy](#)

## Q&A

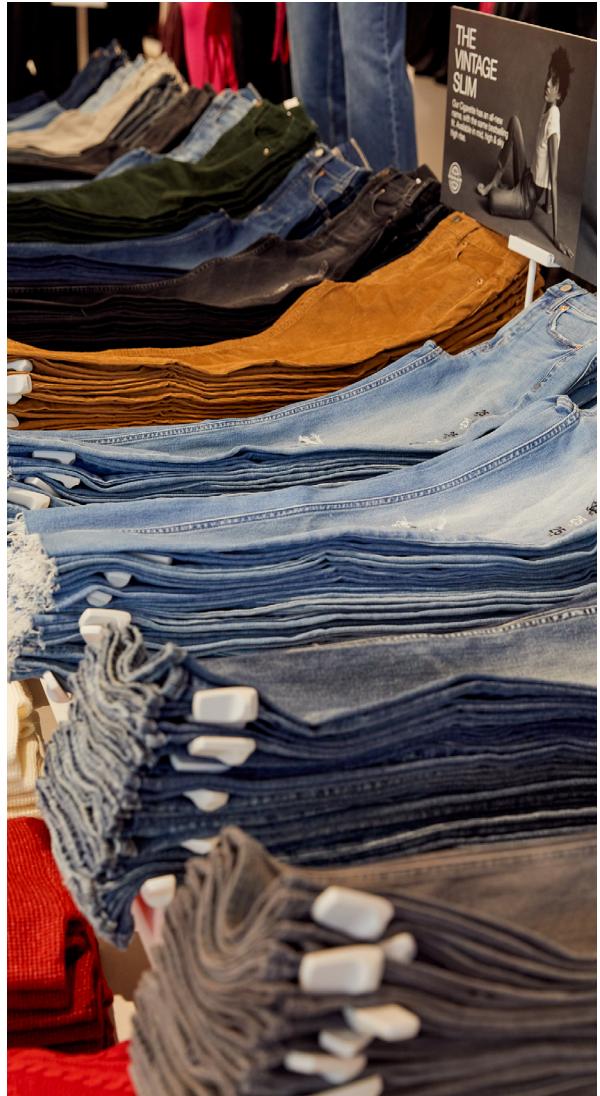
**Q:** My brother-in-law used to work for a company that Gap Inc. is planning to announce a marketing partnership with next month. I think he would be interested to know about the new relationship. Can I let him know the exciting news?

**A:** No. Sharing material, non-public information such as this with unauthorized people, or advising others to buy or sell company stock based on such information, violates our policy and could violate the law.

## What is material information?

Material information is important, non-public company information that could be relevant to someone deciding whether to buy or sell a stock or any security. Some examples of material information include earnings and sales information, proposed acquisitions, management changes, planned dividends or any other non-public information that could affect the price of a stock.

## Trade Rules



### Why it matters.

As a global business, Gap Inc. engages in international commerce and the transfer of goods and technology to various countries. While it is a necessity for our company to import and export goods, all business must be conducted in line with applicable laws.

### Your responsibilities.

**KNOW THE RULES.** U.S. and international trade laws are complex, so if you are in any way involved in sending Gap Inc. products and services from one country to another or otherwise making them available in foreign nations, work with your manager to be sure the transactions stay within the bounds of applicable laws.

**EXPORT COMPLIANCE.** An export can happen when goods or technology are transferred to a foreign national, even within the same company, so be careful when conducting transactions, and seek clarification if you have questions.

**ANTI-BOYCOTT POLICY.** A boycott occurs when one person, group or country refuses to do business with other people or countries. A request to join a boycott may show up in a bid invitation, purchase contract, letter of credit, verbally or through other means of communication. Do not cooperate with boycotts that are not approved by the U.S. government. We are required to report requests to participate in certain boycotts, so if you receive or think you have received such a request, report it to [Global Integrity](#) immediately.

**SANCTIONS.** Do not do business with individuals or organizations that are under sanctions imposed by the United States and other countries or entities. These sanctions may prohibit business dealings such as the transfer of assets, monetary payments, provision of services, exports of sensitive technology, and travel to the affected countries.

**SPEAK UP.** Reach out to [Global Integrity](#) if you have questions, concerns or need help navigating international trade laws.

For more details, refer to: [Sanctions Compliance Policy](#)

## Q&A

**Q:** We are developing new software for product manufacturing that uses artificial intelligence in a novel way. I would like to share the software with my colleague overseas. Is that OK?

**A:** It depends. Since a transfer of technology can be considered an export, it may require a license or be subject to other regulatory requirements. This could also violate intellectual property rights, including software copyrights. Contact [Global Integrity](#) for guidance.

# Public Communications and Social Media

## Why it matters.\*

Gap Inc. is an ecosystem with people at the center, and our brands inspire authentic self-expression through our products and experiences. To protect our brands and reputation, we have individuals who are authorized to speak on behalf of Gap Inc. and tell those stories with a unified voice.

## Your responsibilities.

**FOLLOW OUR RULES.** Become familiar with our policies regarding communication, public disclosure and social media.

**REFER MEDIA REQUESTS.** Unless it is your job to specifically communicate on behalf of Gap Inc., refer all requests from the media to Communications. Do not comment or make statements to the media on behalf of Gap Inc.

**USE SOCIAL MEDIA RESPONSIBLY.** Gap Inc. respects the right of employees to use social media and other online means of self-expression and communication during personal, non-work time. Remember that what you say online can be permanent, and you are responsible for the content you publish.

**GET PRE-APPROVAL FOR PUBLISHED CONTENT OR EXTERNAL SPEAKING.** Advanced approval is required before you speak at an event or submit a column, article, op-ed or other item to be published online or in print. Submit your request to [Communications](#) and refer to the [External Speaking](#), [Insider Trading](#) and [Disclosure](#) policies for guidance.

**SPEAK UP.** If you have questions about communications or social media use, discuss it with your manager or contact Communications or the Social Media team.

- DO familiarize yourself with and follow our policies on [Electronic Communication and Social Media, Disclosure](#) and [Zero Means Zero: No Discrimination or Harassment](#).
- DO respect copyrights, trademarks and other intellectual property belonging to Gap Inc. or third parties.
- DO fully disclose that you are an employee if you are endorsing or commenting online about Gap Inc. or its products and services.
- If posting online about Gap Inc. products or services, DO make statements that reflect your bona fide, honest opinions, findings, beliefs and/or experiences.
- DO NOT represent yourself as a spokesperson for Gap Inc. without written authorization from the Communications team.
- DO NOT post any confidential information about Gap Inc.
- DO NOT transmit personal or private information about our customers or employees.

## What are speaking engagements?

Speaking engagements are defined as any situation where you might address an external audience, including an industry panel, podcast, roundtable, vendor conference, trade association speech, alumni event, university class, etc.

This includes being interviewed for an article or submitting an op-ed piece with the intent to be featured in a trade publication or any other medium where you may be quoted. This does not include phone calls or business meetings.

For more details, refer to: [Media & Non-Traditional Media Guidelines](#)  
[Electronic Communication and Social Media Policy](#) | [External Speaking Policy](#)  
[Disclosure Policy](#)

## Q&A

**Q:** I noticed a social media message from someone who is making false claims about Gap Inc. products. Is it OK for me to set the record straight?

**A:** Not directly. It is important for you to refer any inaccuracies you notice to the Social Media team. Please do not answer on behalf of Gap Inc.

**Q:** I am excited about a new product line we are going to be launching next month. Is it OK to let my followers and friends on social media know to look out for the new items soon?

**A:** It depends. You must be careful and remember that our [Confidential Information Policy](#) applies online too. If something is not yet public, you cannot post it on your social media. It's good that you are excited by our products; just make sure you do not reveal anything before Gap Inc. makes the information public.

## Artificial Intelligence



### What is generative AI?

Generative AI is a type of artificial intelligence system that generates new content, such as text, images, software code, product designs and other media, in response to prompts.

### Why it matters.

While generative AI can deliver significant benefits by enhancing idea generation, customer experience, productivity and insights, it carries significant risks. These include generating factually untrue or biased outputs, infringing on intellectual property and copyrights and introducing cybersecurity and privacy risks.

Improper use of generative AI tools can negatively impact Gap Inc.'s brand, image and reputation.

### Your responsibilities.

At Gap Inc., we are committed to operating AI products and systems ethically and responsibly. All employees must be sure their AI outputs are respectful of human rights, accurate, truthful and appropriate for their intended context.

**GET APPROVAL.** All new generative AI tools must be vetted and approved by the Office of AI, must have enabled safety features to minimize the risk of copyright or license infringement and must be accessed using a Gap email address and Gap credentials. See [AI Application Requests and Reviews](#) for more information.

**FOLLOW OUR RULES.** All generative AI use and outputs must follow Gap Inc.'s policies and procedures, be checked for accuracy and detectable bias, avoid discrimination and the manipulation and breach of privacy and security for both customer and employee data and have a lawful business purpose and ethical intent. Confidential business information may only be input into Gap-approved AI tools. The input of personal information and sensitive personal information into any AI tool, even if Gap-approved, is strictly prohibited.

**SPEAK UP.** If you have questions or concerns about the use of generative AI tools or suspect a violation of the law or our policies, reach out to your manager, the Office of AI or one of the other [Speak Up resources](#).

For more details, refer to: [Generative AI Use Policy](#)

## Product Integrity

### Why it matters.

As a house of iconic American brands, Gap Inc. represents the best of American style, and we bring people together. Our rigorous internal quality controls make sure that we create high-quality products that are produced, tested, packaged and labelled to a high standard and in compliance with all applicable laws.

### Your responsibilities.

**OPERATE WITH RIGOR.** Maintain Gap Inc.'s high standards at all times.

**IMAGINE BETTER.** Use insights to anticipate what's next, try new ideas and always seek to improve our products.

**SPEAK UP.** If you suspect a quality issue with one of our products, raise your concern to your manager or one of the other [Speak Up resources](#).



## Q&A

**Q:** I have noticed a couple of quality issues with a newer sample, but my manager is really interested in pressing forward to introduce this new product. Should I keep quiet?

**A:** No. If you notice quality issues, speak up and report your concerns. If you do not feel comfortable speaking with your manager, follow our [Open Door Policy](#) or use one of the other [Speak Up resources](#).

## Audits and Government Investigations



### Why it matters.

Our culture of integrity depends on providing truthful information to all our stakeholders. This means fully and truthfully cooperating with lawful audits, inspections and investigations, including those conducted by Gap Inc., designated external third parties or any government body.

### Your responsibilities.

**COOPERATE WITH REQUESTS.** Our Internal Audit department assists in executing effective internal controls, reliable financial reporting and the protection and optimal use of Gap Inc. assets. You are expected to participate as needed and cooperate with the Internal Audit team as they conduct compliance, assurance and advisory reviews of our global operations.

If the Legal department asks for your assistance with a government request or investigation, be truthful and cooperate as needed. If a representative of a government agency asks you to provide company information, contact Legal before responding.

In all cases, do not coerce or mislead any auditor engaged in an audit or review of Gap Inc.'s records and information, and never provide, offer or promise anything of value in an attempt to influence the outcome.

**TAKE ACTION.** If you are contacted by a government official or are contacted about a government complaint concerning the company, immediately contact Legal or the [COBC Speak Up Hotline](#). Note that Gap Inc. takes any report to the government seriously and will not tolerate retaliation against anyone who makes a report to a government agency.

## Q&A

**Q:** I just received a message that a government complaint has been filed against the company that names me as a witness. What should I do?

**A:** If you receive notice that a government complaint has been filed against the company, immediately contact Legal and provide the information you have.

## Politics



### Why it matters.\*

Gap Inc. participates in political and regulatory processes and advocates for legislation on issues that affect our business and community interests. This is done in a way that is consistent with our values, legal obligations, this COBC and the Gap Inc. Code of Vendor Conduct.

Gap Inc. also understands that you may hold strong beliefs on social, political and economic issues of personal significance. If you so choose, you are encouraged to engage constructively and responsibly in the political process outside of work hours.

### Your responsibilities.

**GET INVOLVED.** If you so choose, engage with your community and work on issues that matter to you, but be sure to never suggest or imply that you are speaking or acting on behalf of Gap Inc. or that Gap Inc. supports your personal political views.

All political activity on behalf of the company, including lobbying, must be approved in advance by Government Affairs.

**USE YOUR OWN TIME AND RESOURCES.** Your personal political activities and support for any political candidate or party must be done on your own time and with your own resources.

**GAP INC. GOOD GOVERNMENT FUND (GAP GGF).** Gap GGF is a voluntary, bipartisan political action committee that allows eligible employees to contribute collectively to support common Gap Inc. causes and the efforts of our Government Affairs team. All Gap GGF contributions are made in accordance with U.S. laws and regulations governing political action committees.

You are not permitted to make direct financial contributions to any political candidate on behalf of Gap Inc.

For more details, refer to: [Gap GGF Thread page](#)

## Q&A

**Q:** I am attending a rally for a political candidate after work today, and I need to make a few dozen copies of a flyer to hand out during the event. I plan to use the copy machine and paper supplied at my work location to make these copies. Is that OK?

**A:** No. You are not allowed to use Gap Inc. resources for personal political activities, and time spent engaging in personal political activities must be done outside of your working hours.

## Human Rights



### Why it matters.

At Gap Inc., we believe that all people deserve respect and dignity. We follow all applicable employment laws and regulations, and we always consider our impact on communities and workers around the world when pursuing business goals.

### Your responsibilities.

**FOLLOW THE LAW.** We follow all applicable labor regulations and laws, including those for minimum wage, overtime pay requirements, meal periods, rest breaks and leave time. We do not engage in or condone forced labor, slavery, child labor or human trafficking.

**HOLD VENDORS AND THIRD PARTIES ACCOUNTABLE.** We expect our vendors, third parties and suppliers to actively protect against human rights abuses, uphold applicable labor regulations and follow our [Gap Inc. Code of Vendor Conduct](#).

**SPEAK UP.** Seek guidance from your manager, Human Resources or any other [Speak Up](#) resource if you have questions or concerns about human rights standards.

For more details, refer to:

[Supply Chain Statement of Compliance](#)  
[Gap, Inc. Human Rights Policy](#)  
[Human Rights and Labor Issues in Our Supply Chain](#)  
[Code of Vendor Conduct](#)

## Q&A

**Q:** On a recent tour of a supplier's manufacturing facility, I noticed that some of the workers looked very young. Since we do not operate this facility, is there anything I can do?

**A:** Yes. We expect third parties that we do business with to maintain labor standards that follow applicable law as well as our [Code of Vendor Conduct](#). If you think there may be an issue, you should contact your manager or one of the other [Speak Up resources](#).

# Resources

- [Anti-Corruption & Anti-Bribery](#)
- [Brand Protection & Counterfeit Products](#)
- [Code of Vendor Conduct](#)
- [Competition Law](#)
- [Conference and Third-Party Training](#)
- [Conflicts of Interest](#)
- [Confidential Information](#)
- [Corporate Records & Information Management \(RIM\)](#)
- [Data Protection Policy & Practice Guide](#)
- [Disclosure](#)
- [Electronic Communications & Social Media Policy](#)
- [External Speaking](#)
- [Generative AI Use](#)
- [Gifts & Entertainment](#)
- [Information Security](#)
- [Insider Trading](#)
- [Media & Non-Traditional Media Guidelines](#)
- [Open Door](#)
- [Open Source Software](#)
- [Samples & Fixtures Management](#)
- [Sanctions Compliance](#)
- [Workplace Violence Prevention](#)
- [Zero Means Zero: No Discrimination or Harassment](#)
- [Zero Tolerance for Retaliation](#)

For more information, resources and company policies, go to the [Employee Resource Center](#).

**Waiver.** The provisions of this COBC may only be waived by Gap Inc.'s Chief Legal and Compliance Officer, and in the case of executive officers, directors and our Corporate Controller, by our Board of Directors or a Board Committee. Any waiver of the COBC for an executive officer, director or our Controller will be promptly disclosed as required by law or stock exchange regulation.

# Questions?

We are here to support you. If you need guidance on any topic covered in this COBC, contact [Global Integrity](#).

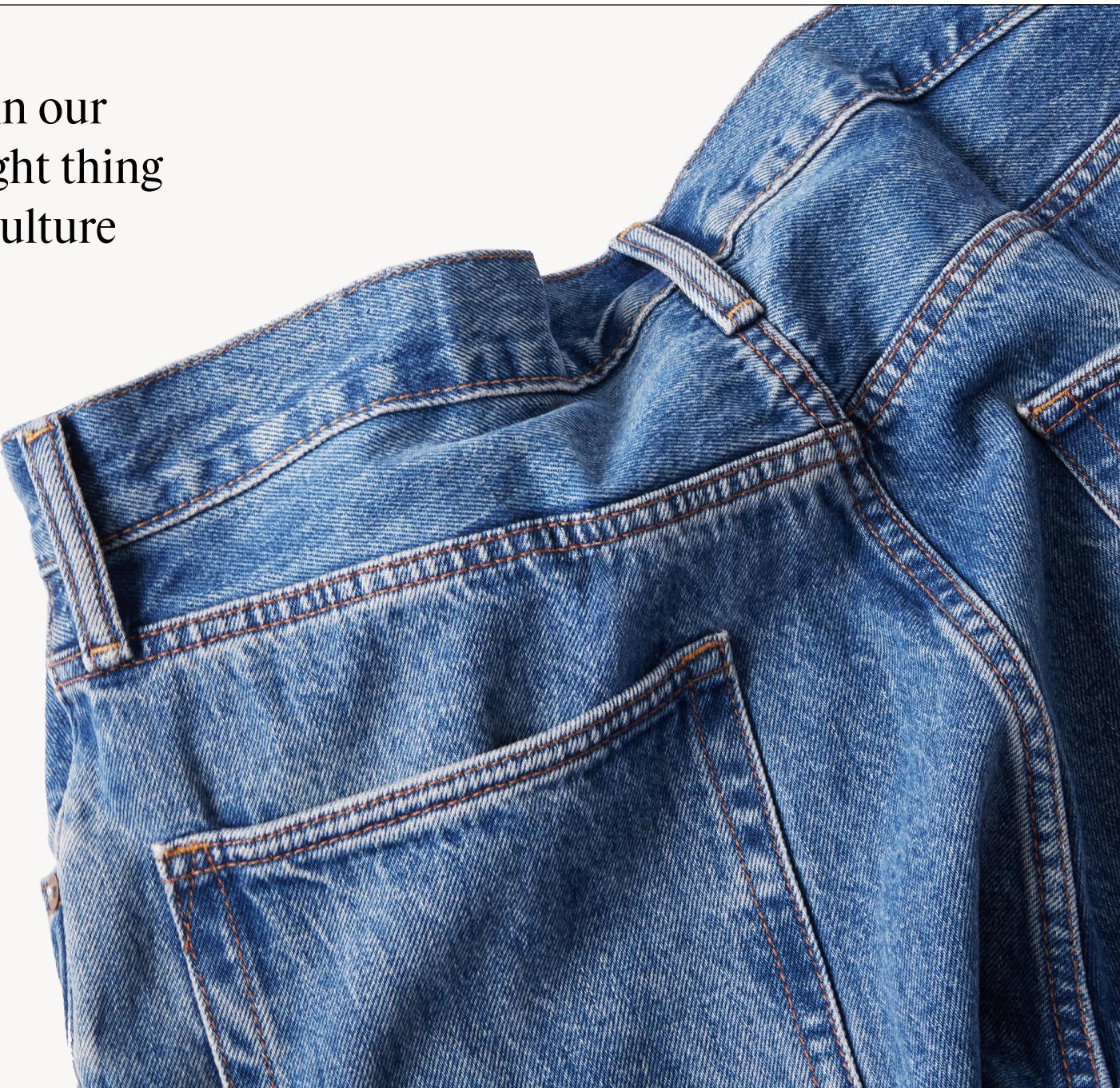


Thank you for joining us in our commitment to do the right thing and contributing to our culture of integrity.



A handwritten signature in black ink.

Julie Gruber  
Chief Legal and Compliance Officer



GAP  
INC.

OLD NAVY

GAP

BANANA  
REPUBLIC

ATHLETA

Do what's  
right.

OUR GLOBAL CODE OF BUSINESS CONDUCT

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