

## **GAP INC. POLITICAL ENGAGEMENT POLICY**

At Gap Inc., we believe that it is important to participate in political and regulatory processes on issues that affect our business and community interests. We work proactively to enable Gap Inc.'s strategies through public policy and government advocacy. We also participate in political activities and advocate for legislation when there is a connection to our business and our ability to grow the business in a way that is consistent with our values, our legal obligations, and our Codes of Business Conduct and Vendor Conduct. For example, in the past we have been active in policy discussions and have lobbied on issues related to trade, tax, workforce, privacy, transportation/infrastructure, sustainability and retail crime issues. Gap Inc. only takes positions on ballot measures, initiatives or propositions that have a direct impact on our business.

### **Corporate Political Contributions**

Gap Inc. participates in the political process by using corporate funds to make political contributions to committees and ballot initiatives that further our business strategies, community interests and public policy objectives. Our Government Affairs department manages and oversees the Company's political activities. All corporate political contributions are reviewed and approved in advance by both the (i) Vice President of Government Affairs and (ii) the Chief Legal and Compliance Officer and Corporate Secretary. Before any contribution is approved, we carefully review the recipient's standing and position to ensure alignment with our business. No contributions are made based on the personal interests of any employee or director. All contributions are given in compliance with Gap Inc.'s internal policies.

In FY 2023, Gap Inc. did not make any corporate political contributions, and we did not make any contributions to 501(c)(4) organizations that may be used for political purposes. To review political contributions made in FY 2022, 2021, 2020, 2019 and 2018 there is an archive at the end of this document. We report our corporate political contribution spending on an annual basis, or as required by state and local laws.

### **FY 2023 Corporate Political Contributions**

In FY 2023, Gap Inc. did not make any corporate political contributions.

### **Gap Inc. Good Government Fund (Gap PAC)**

Gap Inc. supports employee participation in the political process and provides eligible employees with the opportunity to contribute to the Gap Inc. Good Government Fund (formerly named the Gap Inc. Political Action Committee, and still commonly referred to as Gap PAC). Gap PAC is a separate legal entity, with its own oversight council, and is funded solely from voluntary contributions made by eligible Gap Inc. employees, directors, stockholders, and their families. Gap PAC supports candidates and committees that best support our business goals and strategies.

Gap PAC was formed to impact public policy relevant to our business interests, guided by our company purpose to bridge gaps to create a better world. The slate of giving is overseen by an internal PAC

Council comprised of individuals from legal, government affairs, store operations, and logistics. Other PAC Council members may be added.

The PAC Council bases its giving decisions on a number of factors, most importantly the policy positions of individual candidates, committees and organizations on issues that impact our business priorities. Other factors that are considered include:

- Serving in leadership in the House or Senate.
- Members of key committees of jurisdiction on issues relevant to our business, notably the House Ways & Means and Senate Finance Committees.
- Members representing states and congressional districts where Gap Inc. has a significant presence.

The Vice President of Government Affairs manages and oversees all Gap PAC contributions after consultation and approval by our internal PAC Council. All Gap PAC contributions are made in a legal, ethical and transparent manner in accordance with federal laws and regulations governing political action committees. All Gap PAC contributions are fully and publicly disclosed in reports filed with the Federal Election Commission (FEC).

In Calendar Year (CY) 2023, Gap PAC made \$127,000 in political contributions and had \$100,029 in incoming receipts. We report Gap PAC political contribution spending on an annual or quarterly basis per FEC reporting requirements. Gap PAC's FEC reports can be found on the FEC website.

### **Board Oversight**

Our corporate contributions are reviewed annually by the Gap Inc. Board of Directors. The Board also receives periodic updates regarding our political activities.

### **Gap Inc. Association Memberships**

Gap Inc. is a member of various industry and trade associations that further our business, economic and community interests. These associations keep us informed on developments and trends in our industry and help us focus our advocacy in the most effective way. We often communicate and advocate our positions through our membership in concert with our industry partners. All dues paid to these trade associations are made with corporate funds. In Calendar Year (CY) 2023, the estimated expenditure was \$893,070, 48% of which supported non-deductible lobbying activities. A list of trade associations Gap Inc. supported in CY 2023 is included at the end of this report.

### **527 Organizations/Independent Expenditures**

As a matter of policy, neither Gap Inc. nor Gap PAC make any contributions to organizations commonly known as "527 Organizations," which are political organizations that are not regulated by state or

federal election regulations. Similarly, we do not make contributions through independent expenditure committees.

### **Trade Associations**

The following is a list of U.S.-based trade and industry associations that Gap Inc. supported in CY 2023 in excess of \$1,000 that engage in significant public policy advocacy related to our core business interests. Our financial support to these organizations in CY 2023 was approximately \$893,070, 48% of which supported non-deductible lobbying activities.

<b>Organization</b>
American Apparel & Footwear Association
Arizona Retailers Association
Bay Area Council
Business for Innovative Climate and Energy Policy
Business Roundtable
California Retailers Association
Florida Retailers Association
Illinois Retail Merchant Association
LA County Business Federation
National Retail Federation
Ohio Council of Retail Merchants
Retail Council Of New York State
Retail Industry Leaders Association
San Francisco Chamber of Commerce
San Francisco Partnership
Texas Retailers Association
Washington Retail Association

### **Archive of Corporate Political Contributions**

#### **FY 2022 Corporate Political Contributions**

In FY 2022, Gap Inc. made corporate political contributions of \$37,500, as detailed below.

<b>State</b>	<b>Recipient</b>	<b>Amount</b>
CA	Bay Area Legislative Leaders PAC	\$5,000
CA	CA Retailers PAC	\$15,000
CA	Equality California PAC	\$2,500
CA	SF Partnership Government Reform Fund	\$10,000
NY	New York Retailers for Effective Government PAC	\$5,000

### **FY 2021 Corporate Political Contributions**

In FY 2021, Gap Inc. made corporate political contributions of \$6,000, as detailed below.

State	Recipient	Amount
CA	Evan Low for Assembly	\$1,500
CA	Jacqui Irwin for Assembly	\$1,500
CA	Sydney Kamlager for Senate	\$1,500
CA	Anthony Portantino for Senate	\$1,500

### **FY 2020 Corporate Political Contributions**

In FY 2020, Gap Inc. made corporate political contributions of \$50, as detailed below.

State	Recipient	Amount
WA	WRA Retail Action Council PAC	\$50

In FY 2020, Gap Inc. did not make any contributions to 501(c)(4) organizations that may be used for political purposes.

### **FY 2019 Corporate Political Contributions**

In FY 2019, Gap Inc. made corporate political contributions of \$23,050, as detailed below.

State	Recipient	Amount
CA	HERTZBERG FOR STATE CONTROLLER 2022 (FPPC # 1413987)	\$1,500
CA	MARC BERMAN FOR ASSEMBLY 2020 (FPPC #1414419)	\$1,500
CA	COLONEL (RET) TOM UMBERG FOR SENATE 2022 (FPPC #1415628)	\$1,000
CA	COMMITTEE ON JOBS GOVERNMENT REFORM FUND (FPPC #982683)	\$19,000
WA	WRA Retail Action Council PAC	\$50

In FY 2019, Gap Inc. did not make any contributions to 501(c)(4) organizations that may be used for political purposes.

### **FY 2018 Corporate Political Contributions**

In FY 2018, Gap Inc. made corporate political contributions of \$44,998, as detailed below.

State	Recipient	Amount
CA	SF Forward (FPPC # 891575)	\$24,999
CA	A Home for Everyone, Yes on Props 1 & 2 (FPPC # 1411010)	\$19,999

In FY 2018, Gap Inc. did not make any contributions to 501(c)(4) organizations that may be used for political purposes.