

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 2024, Gap Inc. made corporate political contributions as listed below. 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 2023, 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 2024 Corporate Political Contributions

In FY 2024, Gap Inc. made corporate political contributions of \$15,000, as listed below. We did not make any contributions to 501(c)(4) organizations that may be used for political purposes.

| State | Recipient | Amount |
|-------|--------------------|----------|
| CA | Healthy Vibrant SF | \$5,000 |
| CA | CA Retailers PAC | \$10,000 |

Gap Inc. Good Government Fund (Gap GGF)

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). Gap GGF 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 GGF supports candidates and committees that best support our business goals and strategies.

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

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

In Calendar Year (CY) 2024, Gap GGF made \$82,000 in political contributions and had \$109,857 in incoming receipts. We report Gap GGF political contribution spending on an annual or quarterly basis per FEC reporting requirements. Gap GGF'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's Governance and Sustainability Committee 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) 2024, the estimated expenditure was \$1,307,920, 57% of which supported non-deductible lobbying activities. A list of trade associations Gap Inc. supported in CY 2024 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 2024 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 2024 was \$1,307,920, 57% of which supported non-deductible lobbying activities.

| Organization |
|---|
| American Apparel & Footwear Association |
| Arizona Retailers Association |
| Bay Area Council |
| Business Roundtable |
| Business for Innovative Climate and Energy Policy |
| California Retailers Association |
| Florida Retail Federation |
| Illinois Retail Merchants 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 |
| Tennessee Retail Association |
| Texas Retailers Association |

Archive of Corporate Political Contributions

FY 2023 Corporate Political Contributions

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

FY 2022 Corporate Political Contributions

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

| State | Recipient | Amount |
|-------|---|----------|
| 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.