

W0. Introduction

W0.1

(W0.1) Give a general description of and introduction to your organization.

Gap Inc. was founded in San Francisco in 1969. Today, Gap Inc. is a leading global retailer offering clothing, accessories and personal care products for men, women and children under the Old Navy, Gap, Banana Republic, Athleta, Intermix, Janie and Jack brands, with approximately 129,000 employees, including part-time and full-time employees. Gap Inc. products are available for purchase worldwide through company-operated stores, franchise stores, and e-commerce sites. (as of FY'19).

As our business evolves, we continue to work on further integrating sustainability into our core business and interactions with all stakeholders, including the suppliers that make our branded products. We believe sustainability promotes innovation and improves employee engagement, operational efficiency, productivity, and ultimately, our profitability.

Our Athleta brand is certified as a benefit corporation ("B Corp"), furthering its commitment to using business as a force for good to drive social and environmental impact by meeting rigorous standards across social and environmental performance, accountability and transparency. Additionally, we amended Athleta's legal charter to become a Delaware Public Benefit Corporation in order to further uphold Athleta's commitments to people and the planet. We plan to leverage the learnings from Athleta as a case study for Gap Inc., providing a benchmark and roadmap of potential opportunities for greater social and environmental impact across the enterprise.

W0.2

(W0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date
Reporting year	February 1 2019	January 31 2020

W0.3

(W0.3) Select the countries/areas for which you will be supplying data.

- China
- India

W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response.

USD

W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups over which operational control is exercised

W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?

No

W1. Current state

W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Not very important	Vital	Direct use: Freshwater use in our direct, owned operations – including our stores, distribution centers and HQ offices – is limited to supporting our main activities and thus is minimally important. Freshwater in our direct operations is primarily used for hygiene, cleaning and maintenance activities, food preparation and personal consumption by employees. Indirect use: Water is a key input in dyeing, washing and finishing our garments within our supply chain. Additionally, we rely on water-intensive cotton fibers to manufacture most our product. Some of our suppliers have water intensive operations in water scarce areas and therefore face risk to business continuity if freshwater were limited. Limited availability of freshwater may result in production delays or longer lead times for our products, which can negatively impact sales. Access to good quality freshwater is also important for our suppliers' workers' personal consumption and well-being as well as cleaning and maintenance.
Sufficient amounts of recycled, brackish and/or produced water available for use	Not very important	Important	Direct use: Recycled water is not generally used to support Gap Inc.'s owned operations, because freshwater is required for all hygiene, cleaning and maintenance activities, food preparation and personal consumption by employees. Use of recycled water is limited to landscape irrigation, which generally falls outside of our own facilities. Because recycled water is not generally used in direct operations, this is not very important to the success of our business Indirect use: Water is a key input for garment production processes at mills and laundries, including dyeing, washing and finishing. An increasing amount of our supply chain is using partial recycling techniques to conserve water. Some geographical areas also have Zero-Liquid Discharge (ZLD) laws that mandate water recycling rates of 80-95%. We are supportive of these efforts and work with our strategic suppliers to increase their use of recycled water. Waste water treatment is also important for protecting the health and safety of workers and people in the local community; high-quality water treatment is one of our critical areas of compliance for our wet processing suppliers.

W1.4

(W1.4) Do you engage with your value chain on water-related issues?

Yes, our suppliers
 Yes, our customers or other value chain partners

W1.4a

(W1.4a) What proportion of suppliers do you request to report on their water use, risks and/or management information and what proportion of your procurement spend does this represent?

Row 1

% of suppliers by number
 76-100

% of total procurement spend
 76-100

Rationale for this coverage

Suppliers are required to adhere to Gap Inc.'s Code of Vendor Conduct (COVC), which includes provisions on management of their environmental impacts, including energy and GHG emissions, air pollution, water consumption, water quality, wastewater, as well as chemical use and handling. Non-compliance with our COVC can lead to a reduction of business, up to and including termination of the business relationship. We request all Tier 1 suppliers of branded products, and our preferred Tier 2 mills to report on water consumption using the Sustainable Apparel Coalition's (SAC) Higg Index Facility Environment Module (FEM). Our teams engage suppliers to encourage and assist them with reporting. Water-related data reported by suppliers through the Higg Index include: annual water usage, daily wastewater production, treatment of wastewater, evidence of water use reductions. In 2018, we also began verifying these assessments for improved reporting .

Impact of the engagement and measures of success

We request that all our Tier 1 suppliers report on water use, risks, and management practices by responding to the Higg Index, and track the percentages which respond and engage. In 2019, 97 percent of our cut and sew manufacturers and 91 percent of fabric mills and dyehouses suppliers used Higg—the highest response rate of any brand SAC members. We have mapped out mill facilities that represent over 75% of our business. This allows us to calculate our water baseline by geography, facility type, and category, and understand our progress towards our goal to save 10 billion liters of water in our manufacturing processes by 2020. All of the denim laundries from which we source have achieved our Water Quality Program (WQP) standard. We have updated our WQP wastewater guidelines to match the new ZDHC Wastewater Guidelines. We rolled out the ZDHC Wastewater guidelines to facilities performing wet processing of our garments in 2018.

Comment

W1.4b

(W1.4b) Provide details of any other water-related supplier engagement activity.

Type of engagement

Innovation & collaboration

Details of engagement

Encourage/incentivize innovation to reduce water impacts in products and services
Encourage/incentivize suppliers to work collaboratively with other users in their river basins
Educate suppliers about water stewardship and collaboration

% of suppliers by number

1-25

% of total procurement spend

51-75

Rationale for the coverage of your engagement

We work with our strategic mill and laundry suppliers on water and energy efficiency programs to incentivize their investments into operational efficiency that minimizes their water consumption. We have engaged 50+ facilities to date in 7 programs across our strategic geographies, such as the India Water Partnership in India, Race to the Top in Vietnam, PaCT in Bangladesh, and NRDC Clean by Design. We concentrate on high-volume suppliers that are located in areas of water risk. As many suppliers are concentrated at a regional level, collaboration and innovation allows for local-specific solutions and action. Our work currently covers about 1-25% of our suppliers. As some of our largest sourcing countries, Vietnam, China represent approximately 47% of our sourcing spend, when including other countries with which we engage in water stewardship programs, we estimate they represent approximately 51-75% of our sourcing spend.

Impact of the engagement and measures of success

Engaging suppliers at the country level has allowed us to expand our coverage and incentivize participation by working with trusted groups such as PaCT in Bangladesh and Race to the Top in Vietnam. This provides competitive benefits to suppliers who are eager to engage in collaborations and gain market and production efficiencies, in addition to compliance with local regulation. Success is measured by progress towards our goal to save 10 billion liters of water in our manufacturing by 2020, as well as the percentage of our procurement spend covered by the suppliers engaged.

Comment

W1.4c

(W1.4c) What is your organization's rationale and strategy for prioritizing engagements with customers or other partners in its value chain?

We look for opportunities that impact water quality and quantity throughout our supply chain, spanning investments at the design, raw materials, processing and finishing stages of our products. These investments help protect water as a resource for supply chain workers and suppliers who rely on the availability of water for their operations.

As a signatory to the [CEO Water Mandate](#), we collaborate with other companies, governments, civil society and others to address challenges related to water scarcity, quality and governance, and access to water and sanitation.

In 2019, as part of our goal to save 10 billion liters of water in manufacturing, we partnered with our supplier, Arvind Limited, on a water treatment facility that will eliminate the use of freshwater at Arvind's denim manufacturing facility in Ahmedabad and result in annual savings of roughly 2.5 billion liters of freshwater. This allowed us to meet our goal ahead of schedule by March 2020.

Since its launch in 2016, WASHWELL™ has saved more than 1 billion liters of water in the finishing process for denim products. WASHWELL products are communicated to our customers on our website and through a "Gap for Good" label on the physical product

We are also moving away from conventional cotton to increasing investments in Better Cotton Initiative's cotton, organic and recycled cotton which have lower associated water requirements and/or use fewer pesticides for more positive water quality impacts.

In 2018, we helped create the "[Businesses for Water Security in the Noyyal Bhavani River Basin](#)" focused on improving the long-term sustainability of India's Cauvery River Basin by holistically addressing context-based water risks aiming at root causes of water risks that threaten businesses, communities, and ecosystems alike.

In 2018, Gap Inc. joined Ceres' Connect the Drops, and launched windows campaigns in Banana Republic stores throughout California to bring customer awareness to the issue of water access.

W2. Business impacts

W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?

No

W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

No

W3. Procedures

W3.3

(W3.3) Does your organization undertake a water-related risk assessment?

Yes, water-related risks are assessed

W3.3a

(W3.3a) Select the options that best describe your procedures for identifying and assessing water-related risks.

Direct operations

Coverage

Full

Risk assessment procedure

Water risks are assessed as part of an enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Type of tools and methods used

Tools on the market

Enterprise Risk Management

International methodologies

Other

Tools and methods used

WRI Aqueduct

Life Cycle Assessment

Internal company methods

External consultants

Comment

We conduct Company-wide enterprise risk assessments and asset-level business continuity planning that encompass sustainability-related risks, including the risks that water could pose to our business. Our asset-level risk assessments evaluate risks to our owned and operated facilities around the world on a country-by-country basis. These assessments are intended to ensure that senior management is aligned on and has taken measures to address the most important risks to our business.

Supply chain

Coverage

Full

Risk assessment procedure

Water risks are assessed in an environmental risk assessment

Frequency of assessment

More than once a year

How far into the future are risks considered?

3 to 6 years

Type of tools and methods used

Tools on the market
International methodologies
Other

Tools and methods used

WRI Aqueduct
WWF Water Risk Filter
SIWI Water Tool
Life Cycle Assessment
Internal company methods
External consultants

Comment

We conduct enterprise-level and asset-level risk assessments, which encompass environmental risks across our business and supply chain, at least once per year. Water risks are also factored into country risk assessments that are conducted annually through collaboration between our Global Sustainability, Sourcing and Supply Chain functions. Our risk assessment procedures look throughout our entire supply chain; this scale allows us to understand all risks and opportunities we face from water.

Other stages of the value chain

Coverage

Please select

Risk assessment procedure

<Not Applicable>

Frequency of assessment

<Not Applicable>

How far into the future are risks considered?

<Not Applicable>

Type of tools and methods used

<Not Applicable>

Tools and methods used

<Not Applicable>

Comment

W3.3b

(W3.3b) Which of the following contextual issues are considered in your organization’s water-related risk assessments?

	Relevance & inclusion	Please explain
Water availability at a basin/catchment level	Relevant, always included	Water is a critical natural resource for our business – used to cultivate raw materials (cotton), consumed in mills and laundries that manufacture our products, and used by customers to wash their clothes. It’s also critical to the health and well-being of the people who make our products, a majority of whom are women. Water availability at a basin/catchment level is relevant for our business, as the garment industry is often centralized in water basins, such as the Godavari and Narmada River Basins in India, as well as the Cauvery River Basin. We source from these regions and many others globally, and water availability is essential to the dyeing, wet processing and finishing of apparel. Local water availability and quality in our sourcing countries could affect our ability to source products on favorable terms. We use the WRI tool to measure affecting water risk levels in these basins such as risks from deteriorating water quality. Risk levels are measure on the scale of 0-5.; Low (0-1), Low - Medium (1-2), Medium-high (2-3), High (3-4), and Extremely high (4-5). We assist our cut-and-sew vendors with conducting performance assessments using the Higg Index at the factory level. Through our Mill Sustainability program, we engaged our strategic mills in efforts to assess water-related risks and opportunities and are expanding our efforts to engage more directly on water-risk mitigation. We partnered with NRDC’s Clean by Design program to improve water conservation at fabric mills in China, and launched the India Water Partnership to build industry collaboration across our sourcing mills in the region. In the Godavari and Narmada River Basins, we worked with partners to conduct hydrological assessments of these river basins to understand the local context and dynamics, including water availability, quantity, quality, and dynamics for communities’ access to water, sanitation, and hygiene services to inform localized solutions. Our partnership with Arvind Limited on a new water treatment facility at Arvind’s denim manufacturing facility will save 2.5 billion liters of freshwater on an annual basis by switching the manufacturing facility’s water source to local municipal wastewater. This preserves the local community’s access to freshwater resources in Ahmedabad, India and reduces business risk for Arvind, Gap Inc. and other brands that source from the facility due to the new reliable source of wastewater.

	Relevance & inclusion	Please explain
Water quality at a basin/catchment level	Relevant, always included	Clean, safe water is critical to the health and well-being of the people who make our products and to our consumers. Water quality at a basin/catchment level is relevant to us as the garment industry is often centralized in certain water basins, such as the Godavari, Narmada and the Cauvery River Basins in India. We source from these regions and many others globally, and water quality is important to the dyeing, wet processing and finishing of apparel. We seek to improve access to water, sanitation and hygiene (WASH) for women and communities touched by our business, through our partnership with USAID. Roughly 80 percent of people who make our clothes are women, and access and affordability to WASH is a major challenge in many of our key sourcing countries. Local water quality in our sourcing countries could affect our ability to source products on favorable terms. We have worked with tools, such as WRI Aqueduct as well as stakeholders to assess water quality and quantity risks in key sourcing countries. We use the WRI tool to measure affecting water risk levels in these basins such as risks from deteriorating water quality. Risk levels are measured on the scale of 0-5: Low (0-1), Low - Medium (1-2), Medium-high (2-3), High (3-4), and Extremely high (4-5). We also assist our cut-and-sew vendors in conducting performance assessments while responding to the Higg Index at the factory level. Through our Mill Sustainability program, we have engaged many of our strategic mills in our efforts to assess water-related risks and opportunities and are expanding our efforts to engage more directly on water-risk mitigation. For a couple examples, we have partnered with the NRDC's Clean by Design program to improve water conservation and productivity at fabric mills in China and have launched the India Water Partnership to build industry collaboration across our sourcing mills in the region. As part of the W+W Alliance, our partner WaterAid engaged local communities and women to conduct water quality tests to understand the quality of their local water and work with local government to develop plans to make improvements where needed. To-date, around 4,500 water sources were tested in 808 villages. In addition, through the W+W Alliance, our partner the Institute for Sustainable Communities works closely with select cotton farmers to pilot water stewardship best practices in cotton cultivation including the importance of nitrate management for water quality issues.
Stakeholder conflicts concerning water resources at a basin/catchment level	Relevant, always included	Water is essential for our business, as the garment industry often sources from locations which face high demand for water resources as well as water stress. We source from these regions and many others globally which may face stakeholder conflicts concerning water resources, and thus include them in our risk assessments. Stakeholders', such as local communities, conflict in our supply chain could affect our reputation and ability to source products on favorable terms. Our Global Sustainability department uses internal methods and engages with external consultants to actively monitor and, where appropriate, engage stakeholders on social and environmental issues, including water quality, availability and access. We have launched the Arvind Water Partnership in India, partly to build towards collaborative solutions that work to relieve tension between community and industry. The program, through our local partners also actively engages local government entities on water access and sanitation in India. Water access specifically is a priority for the National Government of India through its Jal Shakti mission, and the USAID W+W Alliance is supporting this priority.
Implications of water on your key commodities/raw materials	Relevant, always included	Changes in water access and water-related events such as drought or flooding could affect the cost of cotton, which is used in the majority of our products, and other raw materials. Gap Inc.'s Supply Chain and Sourcing team monitors and responds to risks for key raw materials using a multifactor model that includes cotton futures pricing. The team's work to develop and maintain a diverse supplier base across a number of countries reduces risk on an ongoing basis. We also evaluate water and other environmental risks in key sourcing countries through our country-level risk assessments, informed by WRI Aqueduct, and we are working to improve our methods for assessing cotton risks. We used the WRI tool to measure issues affecting water risk levels in these basins such as increasing competition for water resources, changes in water access and water-related events such as drought or flooding could affect the cost of cotton. Risk levels are measured on the scale of 0-5: Low (0-1), Low - Medium (1-2), Medium-high (2-3), High (3-4), and Extremely high (4-5) - these help us determine the location and level of engagement. We focus our cotton strategy around building fiber security and maintaining a comprehensive evaluation of cotton sourcing risks, as well as building a more sustainable source of cotton that is better for people and the planet. As a crop that is primarily grown in high water stress locations such as India, China, and Pakistan, cotton is especially vulnerable to water-related impacts. We also endeavor to use more sustainable cotton across all our brands, and Gap brand, Banana Republic, and Old Navy have all committed to using 100 percent sustainable cotton. This includes organic, recycled and Better Cotton Initiative (BCI) cotton. Through our partnership with ISC (part of the W+W Alliance), we worked with cotton farmers to implement best practices for water savings techniques with approximately 3,100 farmers to reduce their water use in farming cotton. We engaged communities in water budgeting exercises to understand the water stress local communities face. We also worked with local communities to develop local-made bio pesticides and fertilizer to contribute to the improvement of water quality.
Water-related regulatory frameworks	Relevant, always included	Facilities we source from are subject to water-related regulatory frameworks, especially related to wastewater discharge such as Clean Water Act (CWA) and The National Pollutant Discharge Elimination System (NPDES) which issues permits to all wastewater dischargers and treatment facilities. The global apparel industry accounts for high amounts of manufacturing chemical use, and the discharge of these chemicals can threaten local water sources and affect people working with them and living nearby; these effluents are subject to regulation. 1. Input Management: Selection of better chemical inputs and starting materials is an essential part of reducing the use and discharge of hazardous chemicals. As a ZDHC Signatory Brand, we require our suppliers to register with the ZDHC Gateway, maintain a chemical inventory list, and use input chemicals that comply with their MRSL. We are also working to go beyond MRSL conformance by identifying and increasing our use of "preferred" chemicals. In 2018 we initiated two different chemical screening program pilots with 10 strategic mills developed by and for the apparel industry. As well as checking for MRSL conformance, these programs provide additional information about input chemicals (such as a third-party chemical hazard assessment) to help identify "best available" formulations. The goal of both programs is to proactively identify and increase use of safer chemicals in apparel and footwear manufacturing. 2. Process Management: Adherence to chemicals management best practices during manufacturing is critical for reducing human and environmental risks. To support best practices in our supply chain, our Code of Vendor Conduct outlines a number of expectations for chemical use and handling. We require all Tier 1 cut-and-sew suppliers and strategic Tier 2 fabric mill suppliers to respond to the Higg Index FEM 3.0, which enables us to evaluate suppliers based on whether they follow specific chemicals management practices. We also use this data to inform the evolution of Gap Inc.'s chemicals management strategy.
Status of ecosystems and habitats	Relevant, always included	We understand the use of water and chemicals during various stages of our supply chain could have impacts on local ecosystems and habitats. Many of these impacts occur at stages where we have less influence, including cotton and fiber production, though we have identified areas of higher risk, which we have mapped and identified with the WRI Aqueduct tool. Nevertheless, we are working to promote practices that could help to protect local ecosystems and habitats through our Water Quality program (WQP) for denim laundries (which is in its 17th year of operation), Mill Sustainability program and participation in the Better Cotton Initiative, and ZDHC, especially its MRSL and Wastewater Guidelines. With WQP, we are able to assess risk through testing of wastewater discharge from vendor laundry facilities; vendors are required to pass these tests to be compliant with our program. In 2018, we formally adopted the ZDHC Wastewater Guidelines into existing supply-chain programs, including our Water Quality Program (WQP) for all denim laundries - Tier 1 facilities that generate significant amounts of wastewater - and our Mill Sustainability Program. Our strategic mills and laundries are required to test their wastewater twice per year to ZDHC standards and publish the results through the ZDHC Gateway - a data sharing platform that allows brands to monitor supplier wastewater data.
Access to fully-functioning, safely managed WASH services for all employees	Relevant, always included	We seek to improve access to water, sanitation and hygiene (WASH) for women and communities touched by our business. Roughly 80 percent of people who make our clothes are women, and access and affordability to WASH is a major challenge in many of our key sourcing countries. Alongside our strategic implementation partners, we lead a suite of programs to provide education, access to services and financing to women and communities to address their WASH needs. Through water-risk assessments, we have identified India as a critical location for WASH services, making it a strategic location for many of our programs. Within Gap Inc. partner facilities, our COVC requires that key water, sanitation and hygiene needs of garment workers are met. In addition, our P.A.C.E. program, aimed at workers within our supply chain as well as global communities, provides additional capability to bring WASH education to women globally within both manufacturing facilities and communities. Access to WASH services could affect the well-being and productivity of the workers who make our clothes, which in turn could affect our ability to source products on favorable terms. Internal company methods such as, our Code of Vendor Conduct and assessments of the factories that make our branded products cover EHS issues, including access to water and sanitation. WASH is included as a training module for garment workers and community members as part of Gap Inc.'s P.A.C.E. program, which teaches life and job skills to women. In 2016 we became a signatory to the UN Global Compact's CEO Water Mandate where we participate in working groups related to best practices on human rights and WASH, water metrics impact and disclosure, water in operations and supply chain, and collective action and policy engagement. As of May 2020, as part of the W+W Alliance, we have supported 302,000 people with access to water and sanitation through WASH financing in partnership with Water.org and water security planning with WaterAid and the Government of India. We are also working with WaterAid to pioneer a framework that makes for the business case for WASH and are piloting the framework which includes KPIs for measuring progress on WASH in facilities in India.
Other contextual issues, please specify	Not considered	

W3.3c

(W3.3c) Which of the following stakeholders are considered in your organization's water-related risk assessments?

	Relevance & inclusion	Please explain

	Relevance & inclusion	Please explain
Customers	Relevant, always included	We are a specialty retailer, and thus our customers are crucial to our business. We consider customers in our water risks assessments both for impacts on their ability to access our products in our physical stores, as well as through a product lens; we work to use less water in the products we sell them, and we communicate that impact directly to them through clothing labels (Gap for Good) and through our denim pocket inserts which speak to our Water Quality program. Products meeting our WASHWELL standards are communicated to customers in product-level descriptions. The potential impact of water-related events, such as risks from drought or flooding, on our stores and customers is factored into asset-level risk assessments conducted by our Corporate Business Continuity Planning (BCP) department. Our BCP team develops annual preparedness plans on a country-by-country basis to address risks that could affect the well-being of customers and employees in our stores. Flooding, droughts or natural disasters involving high levels of rainfall could close our stores and affect nearby communities, impacting customers. Social media analysis and consumer insights studies have shown that our customers care about the environmental impacts the products they purchase. Our program to reduce the water used in finishing denim saves at least 20 percent of water used in the laundry stage of production. Since the program began in 2016, WASHWELL™ has saved more than 1 billion liters of water. We are also designing products that use more sustainable raw materials that save water use, with a designer-focused Preferred Fibers Toolkit and through sourcing Better Cotton Initiative (BCI) cotton, which can reduce water impacts. We have partnered with suppliers to use waterless dyeing techniques such as "Dry Indigo" foam dyeing in our product. We have continued to communicate our product sustainability efforts to customers through store displays, product descriptions, product labeling, social media and other channels. We also engage in educational campaigns and media around events such as World Water Day and through our strategy to source more sustainable cotton, including the Better Cotton Initiative (BCI).
Employees	Relevant, always included	Employee safety and well-being, including access to clean water, is paramount to our business, and thus they are considered in our risk evaluations. Our Corporate Business Continuity Planning (BCP) team develops annual preparedness plans on a country-by-country basis to address risks that could affect the well-being of Gap Inc. employees at our facilities or on the job. The potential impact of water-related events, such as risks from drought or flooding is factored into asset-level risk assessments conducted by our BCP department. We engage our employees on direct and indirect water risks through direct communications with our facilities teams, as well as through Company-wide communications such as emails, internal communications, as well as lobby and restroom signs. We also engage employees by providing them the tools and education to be able to contribute to our water savings work. In 2019, we updated our Preferred Fiber & Materials Toolkit, which empowers product teams to select the best fibers based on sustainability impacts such as water, chemicals, energy and emissions, land use and biodiversity, social conditions, animal welfare, potential for circularity and improved conditions for people in our value chain. The toolkit also allows product design and development teams to evaluate fibers based on commercial factors, such as quality, cost, availability and traceability. To complement the launch of this toolkit, we developed and incorporated sustainability workshops and a training curriculum into our companywide learning and development program. In 2019, we trained approximately 50 additional product design and development employees through our Learning & Development workshops: Sustainability 101, Sustainability Claims, Fiber Sustainability, Sustainable Wet Processing, Product Circularity and Sustainable Denim. To date, we've reached almost 2,000 employees with these workshops. We also continued publishing our monthly newsletter on product sustainability, which now reaches more than 600 product development employees. We also directly engage our employees in education campaigns, to increase their awareness of water issues. Our #LoveYourWater campaign in 2019 encouraged employees to share simple ways to reduce their own water use by making small changes in their everyday lives.
Investors	Relevant, always included	Natural disasters, such as hurricanes, tornadoes, floods, earthquakes, and other adverse weather and climate conditions; etc., could adversely affect our operations and financial results, impacting investors. We consider them in our risk assessments due to the potential impact on their investments, as well as due to investor action and engagement on water-related risk, through such requests as CDP, MSCI, and other disclosures, ratings, and rankings. We engage investors through our public reporting on water and other sustainability issues, ad hoc responses to inquiries and in-person meetings. We conduct ongoing evaluations of business risks related to water issues across our business and implement various programs to mitigate those risks. These water-related risks range from pricing for raw materials to supply chain disruptions associated with global sourcing and manufacturing. In 2016, we worked with Ceres, an NGO working with an influential investor group, to conduct a multi-stakeholder dialogue to inform our water strategy. This group included investor groups which provided their input to our strategy, including: Ceres, Calvert Investments, CARE, Conservation International, Forum for the Future, Interfaith Center for Corporate Responsibility, as well as NGOs. Investors were further engaged in 2019, when Bob Fisher, then Chairman of the Board of Gap, Inc (and interim CEO in late 2019-early 2020) closed the 2019 Ceres Conference with a call to action for investors noting the unique responsibility investors have to place pressure on companies to set goals for water risk and other climate change issues.
Local communities	Relevant, always included	Flooding, droughts or natural disasters involving high levels of rainfall could close our stores and affect nearby communities near our owned and operated facilities. We also consider impacts on local communities globally in our risk assessments, as our supply chain may have impacts on their access to adequate amounts of clean, safe water. Gap Inc. has partnered with WaterAid, an NGO that has helped millions of people in 34 countries access clean water and decent toilets on several water initiatives. Along with Diageo and Unilever, and with support from the Overseas Development Institute (ODI) and PriceWaterhouse Cooper (PwC), we have developed a new guide to help companies understand and measure the economic benefits of investing in water, sanitation and hygiene. In 2018, through the program, Gap Inc. is funding WaterAid to deliver a comprehensive WASH program for 20,000 people living in marginalized areas of Madhya Pradesh, India. In 2019, Gap Inc. welcomed WaterAid to the USAID and Gap Inc. Women + Water Alliance to lead local capacity building efforts of stakeholders to improve access to clean and safe drinking water.
NGOs	Relevant, always included	We have worked closely with a number of international and local NGOs in key sourcing countries to evaluate and address water risks in our supply chain. At the international level, our work to assess and take action on water-related risks and opportunities has included Conservation International, NRDC and WWF, Ceres, ZDHC, SAC. Local examples include our engagement with IPE in China and our work with Race to the Top in Vietnam to address regulatory issues that have affected or could impact mills that supply fabrics for our branded products. These stakeholders are factored into our water risk assessment due to their international and local understanding of water risk and resource management, as well as their partnership in implementation of our water programs. In addition, in FY2016 we entered into a multi-year Global Development Alliance with the U.S. Agency for International Development (USAID) to expand our P.A.C.E. program with a specific focus on WASH, support access to WASH services and products through finance, and aggregate stakeholders around proven WASH investments and water stewardship practices. We are working with NGO partners CARE, ICRW, Water.org, and ISC to implement the program. Gap Inc. has partnered with WaterAid, an NGO that has helped millions of people in 34 countries access clean water and decent toilets on several water initiatives. Along with Diageo and Unilever, and with support from the Overseas Development Institute (ODI) and PriceWaterhouse Cooper (PwC), we have developed a new guide to help companies understand and measure the economic benefits of investing in water, sanitation and hygiene. In 2018, through the program, Gap Inc. funded WaterAid to deliver a comprehensive WASH program for 20,000 people living in marginalized areas of Madhya Pradesh, India and in 2019 welcomed WaterAid to the W+W Alliance.
Other water users at a basin/catchment level	Relevant, sometimes included	We also consider broader impacts on other water users at the basin/catchment level globally in our risk assessments, as our supply chain may have impacts on their access to adequate amounts of clean, safe water, and they are often partners with us on water conservation and improvement projects. We have worked with WRI and Conservation International to assess water quality and quantity risks in key sourcing countries in Asia. These assessments have led us to address the impact of water risks on the well-being of the female garment workers that make our clothes, as well as their communities. We are providing training on good water, sanitation and hygiene (WASH) practices through our P.A.C.E. (Personal Advancement and Career Enhancement) program to women in community settings and factories. The program is intended to improve the health, well-being and productivity of women participants, while also providing spillover benefits to their families and other community members. Gap Inc. is a partner in WASH4Work, a diverse group of stakeholders from the public and private sectors that aims to mobilize business that are working together to strengthen businesses contribution to achieving Sustainable Development Goal (SDG) 6. It aims to improve access to WASH in the workplace, in the communities where workers live and across supply chains.
Regulators	Relevant, always included	We consider regulators in our risk assessments, as they are our first interface with local and international regulations. Our Code of Vendor Conduct requires, and our factory assessment process checks for, full compliance with country and local environmental laws and regulations. For example, China has introduced new water quality emissions standards that apply to apparel mills in our supply chain. A Chinese NGO, IPE, is identifying companies that do not comply with these new standards. We are engaging river basin management authorities at the local level through our engagement with IPE in China and our work with Race to the Top in Vietnam. Through this engagement, we are helping take measures to reduce or avoid regulatory action that could disrupt our ability to source products on favorable terms.
River basin management authorities	Relevant, always included	We engage with river basin management authorities, as they are often our partners in our work to mitigate impacts and provide adequate amounts of clean, safe water for local communities throughout our supply chain. We are engaging river basin management authorities at the local level through our engagement with IPE in China and our work with Race to the Top in Vietnam. Through this engagement, we are helping mills take measures to reduce or avoid regulatory action that could disrupt our ability to source products on favorable terms. The USAID Gap Inc. Women + Water Alliance will also be engaging with river basin management authorities in India in two river basins where we source product. Gap Inc. is a partner in WASH4Work, a diverse group of stakeholders from the public and private sectors that aims to mobilize business that are working together to strengthen businesses contribution to achieving Sustainable Development Goal (SDG) 6. It aims to improve access to WASH in the workplace, in the communities where workers live and across supply chains.
Statutory special interest groups at a local level	Relevant, always included	We engage with statutory special interest groups at a local level, as they are often our partners in our work to mitigate impacts and provide adequate amounts of clean, safe water for local communities throughout our supply chain. Our Global Sustainability department actively monitors and, where appropriate, engages stakeholders on a variety of matters, including issues related to water risks. We have worked with the local environmental NGO IPE in China as part of our efforts to engage other local stakeholders and regulators and help mills take action to reduce regulatory risks.
Suppliers	Relevant, always included	We partner with strategic fabric mills, cut & sew facilities and laundries to reduce manufacturing impacts through programs focused on energy and water efficiency and water quality. Our suppliers are the direct users of water throughout our supply chain, so we must engage with them in order to implement our water quality programs, water efficiency efforts and to meet our water savings goals. We have supported all of our Tier 1 garment suppliers with conducting environmental footprint assessments using the Sustainable Apparel Coalition's (SAC) Higg Index. Through our Mill Sustainability Program, we have engaged many of our strategic mills globally to conduct environmental assessments, including water consumption and wastewater treatment and disposal using the Higg Index. We have also actively monitored and helped to remediate wastewater quality at denim laundries through our Water Quality Program (WQP) and recently strengthened our WQP requirements. We are also an active partner in the Zero Discharge of Hazardous Chemicals (ZDHC) 2020 Roadmap to eliminate hazardous chemicals from our supply chain by 2020. We partner with strategic fabric mills, cut & sew facilities and laundries to reduce manufacturing impacts through programs focused on energy and water efficiency and water quality. In 2018, we worked in partnership with 14 denim laundries, 40 mills, and 4 cut sew apparel facilities through various sustainability programs, which continue through 2019. This reduced the amount of water used in manufacturing by 1.3 billion liters, supporting our goal to conserve 10 billion liters of water through sustainable manufacturing practices by the end of 2020.

	Relevance & inclusion	Please explain
Water utilities at a local level	Relevant, always included	We engage with water utilities at a local level, as they are often our partners in our work to mitigate impacts and provide adequate amounts of clean, safe water for local communities throughout our supply chain. Through the USAID/Gap Inc. Women + Water Alliance we are engaging with water utilities at a local level in India in two river basins where we source product. We are working with NGO partners CARE, ICRW, WaterAid, Water.org, and ISC to implement the program. Our partner, Water.org built national and state level government support for water and sanitation lending by collaborating with Ministry of Drinking Water and Sanitation (MDWS) to issue a circular to promote water and sanitation lending options at the district level, including within the target districts chosen by the W+W Alliance in Madhya Pradesh . Our partner WaterAid has also been involved with the new Jal Shakti Mission to define village action plan structures that bring various stakeholders together to address local water challenges in India.
Other stakeholder, please specify	Please select	

W3.3d

(W3.3d) Describe your organization's process for identifying, assessing, and responding to water-related risks within your direct operations and other stages of your value chain.

We use tools, such as WRI Aqueduct, Life Cycle Assessment, as well as advice from external consultants, to understand global water-related risk patterns affecting countries and water basins from where we source, examining over the next 6-10 years and are continually working to improve our methods for assessing risks to agriculture, for our supply of cotton, as well as water use and discharge in manufacturing. Alongside a global view, we combine our internal knowledge of materials sourcing and production to build an understanding of our supply chain and sourcing impacts through LCAs of our products, to understand directly where water-related risks exist in our value chain.

In 2016, the results of LCA on representative products of our supply chain enabled us to build internal tools that help evaluate the water-risks of our supply chain, which we have implemented over the following years as well as better focus our work on water risks. Currently, we focus on the highest areas of impact for our value chain, from raw materials to end of life, and, using primary data for sourcing and manufacturing, utilize our LCA work to understand specific hotspots by product, sourcing location and material. We look for opportunities to expand the use of water-saving innovations across all of our brands, and, where possible, we are shifting to water-efficient raw materials. Our program to reduce the water used in finishing denim saves at least 20 percent of water used in the laundry stage of production. Since the program began in 2016, WASHWELL™ has saved more than 1 billion liters of water. We are also designing products that use more sustainable raw materials that save water use, with a designer-focused Preferred Fibers Toolkit and through sourcing Better Cotton Initiative (BCI) cotton, which can reduce water impacts.

We respond to identified risks in several ways. We request all Tier 1 suppliers of branded products, and identified strategic Tier 2 mills, to report on water consumption using the Sustainable Apparel Coalition's (SAC) Higg Index. This allows us to both identify and address water-related risks within our immediate supply chain. We are then able to integrate this environmental data, including water use, into our sourcing scorecards and decisions. In 2019, 97 percent of our cut and sew manufacturers and 91 percent of fabric mills and dyehouses suppliers used Higg. With this data, we are also able to identify which facilities to target for water-saving interventions (along with what type of intervention would be best suited). Our 2019 partnership with Arvind Limited was initiated to help address water stress risks in the Sabarmati basin. By removing dependence on freshwater sources, we are improving business stability and increasing the local community's access to freshwater supplies.

Additionally, through programs such as the Women + Water Alliance in the Godavari and Narmada River Basins, we have worked with partners to conduct hydrological assessments of these river basins to understand the local context and dynamics, including water availability and quantity, as well as quality, and dynamics for communities' access to water, sanitation, and hygiene services to inform localized solutions.

We have also built a comprehensive evaluation of our raw materials, especially cotton, which is a large user of global water supplies. Our cotton strategy focuses around building fiber security and maintaining a comprehensive evaluation of cotton sourcing risks, as well as building a more sustainable source of cotton that is better for people and the planet. As a crop that is primarily grown in high water stress locations such as India, China, and Pakistan, cotton is especially vulnerable to water-related impacts. We also endeavor to use more sustainable cotton across all our brands, and in 2019 we followed up on our individual brand commitments towards sustainable cotton with an overarching Gap Inc. goal to source 100% sustainable cotton by 2025. This includes organic, recycled and Better Cotton Initiative (BCI) cotton. We joined BCI in 2016, and we are proud that in 2018, Gap Inc. was the world's third largest user of BCI cotton. Across all brands, nearly 60 percent of the cotton Gap Inc. sourced in 2019 was through BCI.

W4. Risks and opportunities

W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes, only in our value chain beyond our direct operations

W4.1a

(W4.1a) How does your organization define substantive financial or strategic impact on your business?

Substantive changes from water risks in our supply chain include those that could have a substantial impact on our business results incurring financial impacts; a threshold would be demonstrated by disclosure in our financial filings such as Form 10-K or causing reputation damage with key stakeholders.

These could include disruptions in our ability to source products or increases in product costs due to risks such as water scarcity, quality, pollution, drought or flooding. An example of an impact that was not considered substantive, but could have the potential to be and is thus considered a risk at some of our operation locations, is extreme weather. We have, historically, had water related impacts to direct operations such as flooding and storm damage from Hurricanes Harvey, Irma, and Maria in 2017. These extreme weather events impacted individual retail stores, but did materially impact our business operations.

Risk of water availability to our suppliers' operations could lead to significant delays in production as our suppliers' capacity is diminished, which could lead to lost sales for our business. Water-related impacts such as drought, storms or extensive flooding in agricultural regions where cotton is produced could substantially increase the cost of cotton, which is an essential raw material for our product, affecting our costs of goods sold. Historically, we have experienced substantive impacts from droughts in Pakistan impacting global cotton pricing and availability, raising our product costs and decreasing margins.

Similarly, water-related impacts in regions where we manufacture may cause disruption or delay in our supply chain. In particular, these types of events could impact our supply chain from or to the impacted region and could impact our ability or the ability of our franchisees or other third parties to operate our stores or websites. In addition, these types of events could negatively impact consumer spending in the impacted regions or, depending upon the severity, globally. Disasters occurring at our vendors' manufacturing facilities could impact our reputation and our customers' perception of our brands. To the extent any of these events occur, our operations and financial results could be adversely affected.

They could also include reputation risks due to the impact of water-related risks that affect the well-being of the people who make our clothes or local communities. These reputation risks could adversely affect consumers' perceptions of our brands and lead to lower demand for our products.

W4.1b

(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1	25	Less than 1%	We've identified water-intensive operations exposed to water risk through water risk mapping, using the WRI Water Risk Atlas, and risk management processes previously referenced. However, these facilities represent our suppliers' preferred and tier 2 mills and laundries in China, India and Pakistan and are not in our direct operations or in the immediate next tier of our supply chain. We provide details on these facilities and our risk management approaches in 4.2a.

W4.1c

(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?

Country/Area & River basin

India	Cauvery River
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Number of facilities exposed to water risk

25

% company-wide facilities this represents

Less than 1%

Production value for the metals & mining activities associated with these facilities

<Not Applicable>

% company's annual electricity generation that could be affected by these facilities

<Not Applicable>

% company's global oil & gas production volume that could be affected by these facilities

<Not Applicable>

% company's total global revenue that could be affected

1-10

Comment

While we have no direct facilities in this basin, this is a key river basin for our supply chain's operations. As a signatory to the CEO Water Mandate, we are collaborating with other companies, governments, civil society and others to address locally based contextual challenges related to water scarcity, quality and governance, and access to water and sanitation. In 2018, we helped to create: "Businesses for Water Security in the Noyyal Bhavani River Basin", a project focused on improving the long-term sustainability of India's Cauvery River Basin, a critical watershed in one of our key sourcing regions. The project looks beyond individual facility or single company initiatives to more holistically address risks in the river basin where our, and other brands' value chains operate. It aims to help address the root causes of water risks that threaten businesses, communities, and ecosystems alike.

W4.2a

(W4.2a) Provide details of risks identified within your value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Country/Area & River basin

China	Dong Jiang
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Stage of value chain

Supply chain

Type of risk & Primary risk driver

Physical	Increased water stress
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Primary potential impact

Reduction or disruption in production capacity

Company-specific description

Gap Inc. brands sourced approximately 16% of merchandise from China in fiscal 2019. Our risk assessments indicate the ability to source products from China on favorable terms could be affected by a number of water-related risks, including water scarcity, stress and extreme weather events such as drought or flooding. Water is a key input at many stages of our supply chain in China, from growing cotton to fabric mills and denim laundries. Cotton is used in a majority of our products and requires substantial quantities of water and chemicals, and China is one of the largest global cotton producers.

Timeframe

1-3 years

Magnitude of potential impact

Medium-low

Likelihood

Likely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact

Experiencing supply chain disruption would cause financial impacts for our sourcing, potentially requiring production shifts or delaying product delivery. China has been

enforcing environmental laws more stringently, especially for facilities that discharge wastewater, which has caused facility closures and supply chain disruptions throughout the industry. We expect this to continue into the near-term over 1-3 years and potentially beyond.

Primary response to risk

Upstream	Increase supplier diversification
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Description of response

Our Supply Chain and Sourcing teams' work to develop and maintain a diverse supplier base across a number of countries reduces risk on an ongoing basis. Gap Inc. has responded to increased water stress on suppliers leading to disruptions in production of cotton through supplier diversification led by our Supply Chain and Sourcing teams. For instance, we have an extensive supplier base across 30+ countries from in case any one supplier experiences water stress and disruptions to production. We are working to integrate more sustainable materials, which are less vulnerable to climate and other environmental impacts, into our product design and sourcing practices. We are also working to use more sustainable fabrics and raw materials that use less water. We require all Tier 1 suppliers of branded products, and identified strategic Tier 2 mills, to report on water consumption using the Sustainable Apparel Coalition's (SAC) Higg Index. This allows us to both identify and address water-related risks within our immediate supply chain. With this, we are working on integrating environmental data, including water use, into our sourcing scorecards and decisions. In 2019, 97 percent of our cut-sew manufacturers and 91 percent of fabric mills and dyehouses used Higg. We have mapped out mill facilities that represent 75% of our business in 2018. We have also actively monitored and helped to remediate waste water quality at denim laundries through our Water Quality Program (WQP).

Cost of response

100000

Explanation of cost of response

Management costs include reoccurring employee resources and time and contributions to external partners. Personnel costs include the costs of Supply Chain, Sourcing and Global Sustainability personnel who are involved in engaging fabric mills and apparel suppliers.

Country/Area & River basin

India	Cauvery River
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Stage of value chain

Supply chain

Type of risk & Primary risk driver

Please select

Primary potential impact

Supply chain disruption

Company-specific description

Experiencing supply chain disruption would cause financial impacts for our sourcing, potentially requiring production shifts or delaying product delivery. We source a large portion of our product from India and this basin comprises of many of our suppliers upstream operations.

Timeframe

1-3 years

Magnitude of potential impact

Medium-high

Likelihood

About as likely as not

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact

This has the potential to affect up to 10% of our purchased goods. Experiencing supply chain disruption would cause financial impacts for our sourcing, potentially requiring production shifts or delaying product delivery.

Primary response to risk

Supplier engagement	Promote investment in infrastructure and technologies for water saving, re-use and recycling among suppliers
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Description of response

As a signatory to the CEO Water Mandate, we are collaborating with other companies, governments, civil society and others to address locally based contextual challenges related to water scarcity, quality and governance, and access to water and sanitation. In 2018, we helped to create: "Businesses for Water Security in the Noyyal Bhavani River Basin", a project focused on improving the long-term sustainability of India's Cauvery River Basin, a critical watershed in one of our key sourcing regions. The project looks beyond individual facility or single company initiatives to more holistically address risks in the river basin where our, and other brands' value chains operate. It aims to help address the root causes of water risks that threaten businesses, communities, and ecosystems alike.

Cost of response

20000

Explanation of cost of response

This is part of our membership to the CEO Water Mandate Action Platform

Country/Area & River basin

India	Godavari
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Stage of value chain

Supply chain

Type of risk & Primary risk driver

Physical	Increased water scarcity
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Primary potential impact

Supply chain disruption

Company-specific description

Experiencing supply chain disruption would cause financial impacts for our sourcing, potentially requiring production shifts or delaying product delivery. We source a large portion of our product from India and this basin comprises of many of our strategic suppliers upstream operations. While we don't have complete traceability on the cotton used in our products, we work with cotton farmers in this basin as part of the Women and Water Alliance to

Timeframe

1-3 years

Magnitude of potential impact

Medium

Likelihood

Likely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure - minimum (currency)

<Not Applicable>

Potential financial impact figure - maximum (currency)

<Not Applicable>

Explanation of financial impact

Experiencing supply chain disruption would cause financial impacts for our sourcing, potentially requiring production shifts or delaying product delivery.

Primary response to risk

Supplier engagement	Introduce/strengthen water management incentives for suppliers
---------------------	----------------------------------------------------------------

Description of response

As a signatory to the CEO Water Mandate, we are collaborating with other companies, governments, civil society and others to address locally based contextual challenges related to water scarcity, quality and governance, and access to water and sanitation. We have been working with key suppliers in this river basin as part of the Women + Water Alliance to develop a water security plan that accounts for their use of water while also evaluating the needs of surrounding communities. With our partner, ISC (Institute for Sustainable Communities), we have developed a comprehensive document, Best Practices for Water Stewardship, that is specific to the apparel industry in an attempt to scale impact across the industry.

Cost of response

20000

Explanation of cost of response

This is part of our membership to the CEO Water Mandate Action Platform.

W4.2b

(W4.2b) Why does your organization not consider itself exposed to water risks in its direct operations with the potential to have a substantive financial or strategic impact?

	Primary reason	Please explain
Row 1	Risks exist, but no substantive impact anticipated	We have approximately 3,900 Company-operated and franchise stores globally as of FY 19, as well as an online retail presence. We do not consider ourselves exposed to water risks in our direct operations as we have a highly-diversified retail presence and are unlikely to experience widespread impact to direct operations. We have, historically, had water related impacts to direct operations such as flooding and storm damage from Hurricanes Harvey, Irma, and Maria in 2017 which temporarily impacted some retail stores, and these have not shown to cause substantive impact, which includes incurring financial impacts which would be demonstrated in our financial filings such as Form 10-K.

W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?

Yes, we have identified opportunities, and some/all are being realized

(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.**Type of opportunity**

Resilience

Primary water-related opportunity

Increased supply chain resilience

Company-specific description & strategy to realize opportunity

In the long-term, we see the importance of building a more resilient supply chain, beginning with raw materials. We endeavor to use more sustainable cotton across all our brands, and Gap brand, Banana Republic, and Old Navy have all committed to using 100 percent sustainable cotton. We have also announced that Gap Inc will derive 100% of its cotton from more sustainable sources by 2025. This includes organic, recycled and Better Cotton Initiative (BCI) cotton. We're taking steps to source more sustainable synthetic fibers, including recycled polyester and recycled nylon. We are working closely with our top suppliers to support our company-wide policy to eliminate our use of wood-derived fibers from ancient and endangered forests by 2020. This commitment helps protect critical forests and also supports our efforts to tackle climate change, as forest ecosystems are vital natural resources that promote biodiversity, protect watersheds and help mitigate the release of carbon dioxide into the atmosphere. As we continue to evolve our sourcing practices, we are also developing an understanding of the regions from where we source, to understand risk from water-sensitive areas alongside other impacts arising from climate change.

Estimated timeframe for realization

1 to 3 years

Magnitude of potential financial impact

Low-medium

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

52000

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact

The number provided is the membership fee cost for large companies as defined by BCI, however our total costs may vary. Retailers and Brand members pay a Membership Fee and a variable Volume Based Fee (VBF). The membership fee is calculated on total cotton lint footprint, and the VBF is calculated on how much Better Cotton is sourced.

Type of opportunity

Products and services

Primary water-related opportunity

New R&D opportunities

Company-specific description & strategy to realize opportunity

All of our brands expanded their efforts to embed sustainability into product design and raw materials selection, and they increased consumer communications to emphasize the importance of sustainability to the people who buy and wear our clothes. In 2018, we completed and rolled out our Preferred Fiber & Materials Toolkit, which we created alongside third-party industry partners. The tool empowers product teams to select the best fibers based on sustainability impacts such as water, chemicals, energy and emissions, land use and biodiversity, social conditions, animal welfare, potential for circularity and improved conditions for women. For every brand within Gap Inc., sustainability is considered a business priority. Beginning with Athleta and Gap testing and scaling innovations from recycled fibers to water-saving denim washes, we learned a lot from our first brand-level goals in 2017. By 2018, all of our brands established executive sustainability steering committees, defined their own priorities and goals, and led strategy workshops on sustainability with cross-functional teams. This empowers each brand to build a strategy that is true to their own identity while also pursuing meaningful environmental and social impact. In 2019, our Banana Republic brand also announced a new partnership with a Spanish mill, Tejidos Royo, to produce denim using Dry Indigo®, an innovative, new waterless, indigo foam-dyeing technique. The process can reduce water usage by up to 99%, while also using 89% less chemicals, reducing energy usage by 65%, and eliminating water discharge when compared to the traditional slasher indigo (or sheet dyeing) process.

Estimated timeframe for realization

1 to 3 years

Magnitude of potential financial impact

Low-medium

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact

We are in the process of evaluating the full opportunity of shifting consumer preferences. We see potential shifts in consumer purchasing of more sustainable products due to efforts such as our shift to more sustainable cotton. For example, we've launched a platform for our Gap brand called Gap for Good, and are increasing the percentage of our product which falls under this platform. Gap, Old Navy, Athleta and Banana Republic have all committed to sustainability goals including a heavy emphasis on water reduction, and are communicating their values and actions to their customers. Estimating financial impact is extremely difficult, as customer choices and sales depend on a wide variety of factors, to which this opportunity may or may not contribute.

Type of opportunity

Markets

Primary water-related opportunity

Stronger competitive advantage

Company-specific description & strategy to realize opportunity

For every brand within Gap Inc., sustainability is considered a business priority. Beginning with Athleta and Gap testing and scaling innovations from recycled fibers to water-saving denim washes, we learned a lot from our first brand-level goals in 2017. By 2018, all of our brands established executive sustainability steering committees, defined their own priorities and goals, and led strategy workshops on sustainability with cross-functional teams. This empowers each brand to build a strategy that is true to their own identity while also pursuing meaningful environmental and social impact. In 2019, our Banana Republic and Old Navy brands established their first sustainability-focused goals, incorporating sustainable materials and water savings into design, raw materials sourcing, and manufacturing and processing. Banana Republic also announced a partnership with a Spanish mill, Tejidos Royo, to utilize their Dry Indigo technology which reduces water usage up to 99 percent while also using 89 percent fewer chemicals, for various products. Apparel using this process was manufactured at a factory that recycles 98% of its water and was launched to customers in early 2020. We have continued to communicate our product sustainability efforts to customers through store displays, product descriptions, product labeling, social media and other channels. We also engage in educational campaigns and media around events such as World Water Day and through our strategy to source more sustainable cotton, including the Better Cotton Initiative (BCI).

Estimated timeframe for realization

Current - up to 1 year

Magnitude of potential financial impact

Medium

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

<Not Applicable>

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

Explanation of financial impact

We are in the process of evaluating the full opportunity of shifting consumer preferences. We see potential shifts in consumer purchasing of more sustainable products due to efforts such as our shift to more sustainable cotton. For example, we've launched a platform for our Gap brand called Gap for Good, and are increasing the percentage of our product which falls under this platform. Gap, Old Navy, Athleta and Banana Republic have all committed to sustainability goals, and are communicating their values and actions to their customers. Estimating financial impact is extremely difficult, as customer choices and sales depend on a wide variety of factors, to which this opportunity may or may not contribute.

W5. Facility-level water accounting

W5.1

(W5.1) For each facility referenced in W4.1c, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Facility reference number

Please select

Facility name (optional)

Country/Area & River basin

Please select

Latitude

Longitude

Located in area with water stress

Please select

Primary power generation source for your electricity generation at this facility

<Not Applicable>

Oil & gas sector business division

<Not Applicable>

Total water withdrawals at this facility (megaliters/year)

Comparison of total withdrawals with previous reporting year

Please select

Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

Withdrawals from brackish surface water/seawater

Withdrawals from groundwater - renewable

Withdrawals from groundwater - non-renewable

Withdrawals from produced/entrained water

Withdrawals from third party sources

Total water discharges at this facility (megaliters/year)

Comparison of total discharges with previous reporting year

Please select

Discharges to fresh surface water

Discharges to brackish surface water/seawater

Discharges to groundwater

Discharges to third party destinations

Total water consumption at this facility (megaliters/year)

Comparison of total consumption with previous reporting year

Please select

Please explain

W6. Governance

W6.1

(W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

W6.1a

(W6.1a) Select the options that best describe the scope and content of your water policy.

	Scope	Content	Please explain
Row 1	Company-wide	Description of business dependency on water Description of business impact on water Description of water-related performance standards for direct operations Description of water-related standards for procurement Reference to international standards and widely-recognized water initiatives Company water targets and goals Commitment to align with public policy initiatives, such as the SDGs Commitments beyond regulatory compliance Commitment to water-related innovation Commitment to stakeholder awareness and education Commitment to water stewardship and/or collective action Commitment to safely managed Water, Sanitation and Hygiene (WASH) in the workplace Commitment to safely managed Water, Sanitation and Hygiene (WASH) in local communities Acknowledgement of the human right to water and sanitation Recognition of environmental linkages, for example, due to climate change	Our water policy is embedded in our sustainability strategy and programs, which we report on online and through our Global Sustainability Report. We include water issues in our Code of Vendor Conduct, which we communicate to all the facilities we source from. The aim of our policies is to communicate that we believe clean, safe water is both an environmental issue and a basic human right. Water is also critical to our business and considered Company-wide—it is used to cultivate raw materials like cotton, consumed in the mills and laundries that manufacture our products. As a business that relies on water to create our products in communities where people need access to water for their daily lives, water stewardship is a core pillar of the Gap Inc. sustainability strategy. To help build the resilience of our Company, our supply chain and the people who make our clothes, we strategically address water use, water contamination and education about water and sanitation.

W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

W6.2a

(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

Position of individual	Please explain
Board Chair	The Gap Inc. Governance and Sustainability Committee of the Board of Directors assists the board in fulfilling its oversight responsibilities relating to the Company's corporate governance matters, including the development of corporate governance guidelines, periodic evaluation of the board, oversight of the Company's programs, policies and practices relating to social and environmental issues and impacts, and such other duties as directed by the board of directors. The Governance and Sustainability Committee is headed by the Board Chair. Specifically related to sustainability, the Committee's responsibilities mandates that they review and evaluate Company programs, policies and practices relating to social and environmental issues and impacts to support the sustainable growth of the Company's businesses. For example, the Committee receives regular updates on our progress against our water goals, in addition to their responsibility to advise on and review water-related initiatives.

W6.2b

(W6.2b) Provide further details on the board's oversight of water-related issues.

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance Overseeing major capital expenditures Reviewing and guiding business plans Reviewing and guiding major plans of action Reviewing and guiding risk management policies Reviewing and guiding strategy Reviewing and guiding corporate responsibility strategy Reviewing innovation/R&D priorities Setting performance objectives	Gap Inc.'s Board of Directors, particularly the Board's Governance and Sustainability Committee, oversees the Company's Global Sustainability program and receives regular briefings directly from the Chief Legal, Compliance and Sustainability Officer who is responsible for environmental initiatives and programming at Gap Inc. The Committee is updated on strategy, goals and progress related to water-related issues, sourcing risks and other environmental issues. The Board of Directors received updates on our enterprise goals for water related issues, specifically our goal to work with our suppliers to save 10 billion liters of water through our manufacturing processes by 2020.

W6.3

(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)

Other C-Suite Officer, please specify (Chief Legal, Compliance and Sustainability Officer)

Responsibility

Both assessing and managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

More frequently than quarterly

Please explain

Gap Inc.'s Chief Legal, Compliance, and Sustainability Officer has the highest level of direct responsibility for water-related matters and who reports directly to our CEO. The Chief Legal, Compliance and Sustainability Officer meets regularly with Gap Inc.'s CEO, Chief Operating Officer, and Chief Strategy Officer about our water strategy, ongoing water programs and specific water issues as they arise. As the individual primarily responsible for the Global Sustainability function, they directly oversee the teams that develop and carry out the workstreams identified to address our environmental risks. This officer has the highest responsibility for all environmental initiatives, including approving annual budgets and strategic plans, guiding strategy, coordinating with our supply chain and strategic sourcing teams, setting of management approach and priorities on achieving water-related goals and building support for larger initiatives such as our USAID partnership.

Name of the position(s) and/or committee(s)

Sustainability committee

Responsibility

Both assessing and managing water-related risks and opportunities

Frequency of reporting to the board on water-related issues

Quarterly

Please explain

The Governance and Sustainability Committee is a sub-committee of the Board of Directors (BoD), and receives regular updates from the Chief Legal, Compliance, & Sustainability Officer on our environmental initiatives and performance. While Governance is an essential function of the BoD, the addition of sustainability to their remit ensures it is elevated as a topic and considered regularly in corporate decision-making. Reports to the Board include regular presentations on our goals and progress, such as our target to reduce water consumption within our manufacturing by 2020.

W6.4

(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?

	Provide incentives for management of water-related issues	Comment
Row 1	No, and we do not plan to introduce them in the next two years	

W6.5

(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?

- Yes, direct engagement with policy makers
- Yes, trade associations
- Yes, funding research organizations

W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?

Through the Gap Inc. and USAID Women + Water Alliance, our NGO partners engage with local (State and District) authorities in India on water security for people and communities. Our partner WaterAid is working with local communities and government to develop water security plans to prioritize community needs for water sanitation and hygiene. As of May 2020, we have developed 151 water security plans and have plans to build the capacity of over 3,000 villages to complete water village action plans over the next two years. Our partner Water.org is also working with local government to enable finance products to be available for water and sanitation products and services.

Our Government Affairs team is closely connected to our Sustainability team, allowing for collaboration and alignment on policy priorities. Before taking action, we first evaluate policy proposals, working with internal stakeholders—including sustainability—to analyze the impacts of proposed policies and develop Companywide positions. Government Affairs participates on committees and working groups organized by advocacy organizations like BICEP/Ceres, as well as environmental and sustainability policy committees organized by retail industry trade associations. If inconsistencies are discovered between our engagement and our commitments, we would evaluate our activities and partnerships to ensure alignment. The team regularly consults with these groups when determining policy positions.

W6.6

(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?

- No, but we plan to do so in the next two years

W7. Business strategy

W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are water-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, water-related issues are integrated	11-15	Changes in water access and water-related events such as drought or flooding could affect the cost of cotton, which is used in the majority of our products, and other raw materials. Gap Inc.'s Supply Chain and Sourcing team monitors and responds to risks for key raw materials using a multifactor model that includes cotton futures pricing. The team's work to develop and maintain a diverse supplier base across a number of countries reduces risk on an ongoing basis. We see the importance of building a more resilient supply chain, beginning with raw materials. We joined the Better Cotton Initiative in 2016 as part of our ongoing efforts to integrate more sustainable materials into our product design and sourcing practices, and have set goals for sourcing across our brands. As we continue to evolve our sourcing practices, we are also developing an understanding of the regions from where we source, to understand risk from water-sensitive areas alongside other impacts arising from climate change. As part of our new Science Based Targets for climate goals we have been mapping our supply chain and building our long-term business strategy to account for a more resilient supply chain, which includes water-related issues.
Strategy for achieving long-term objectives	Yes, water-related issues are integrated	11-15	Changes in water access and water-related events such as drought or flooding could affect the cost of cotton, which is used in the majority of our products, and other raw materials. Gap Inc.'s Supply Chain and Sourcing team monitors and responds to risks for key raw materials using a multifactor model that includes cotton futures pricing. The team's work to develop and maintain a diverse supplier base across a number of countries reduces risk on an ongoing basis. We see the importance of building a more resilient supply chain, beginning with raw materials. We joined the Better Cotton Initiative in 2016 as part of our ongoing efforts to integrate more sustainable materials into our product design and sourcing practices, and have set goals for sourcing across our brands. As we continue to evolve our sourcing practices, we are also developing an understanding of the regions from where we source, to understand risk from water-sensitive areas alongside other impacts arising from climate change. As part of our commitment to build Science Based Targets for climate goals which will be set for and implemented in the next 11-15 years, we have been mapping our supply chain and building our long-term business strategy to account for a more resilient supply chain, which includes water-related issues.
Financial planning	Yes, water-related issues are integrated	11-15	Changes in water access and water-related events such as drought or flooding could affect the cost of cotton, which is used in the majority of our products, and other raw materials. Gap Inc.'s Supply Chain and Sourcing team monitors and responds to risks for key raw materials using a multifactor model that includes cotton futures pricing. The team's work to develop and maintain a diverse supplier base across a number of countries reduces risk on an ongoing basis. We see the importance of building a more resilient supply chain, beginning with raw materials. We joined the Better Cotton Initiative in 2016 as part of our ongoing efforts to integrate more sustainable materials into our product design and sourcing practices, and have set goals for sourcing across our brands. As we continue to evolve our sourcing practices, we are also developing an understanding of the regions from where we source, to understand risk from water-sensitive areas alongside other impacts arising from climate change. As part of our commitment to build Science Based Targets for climate goals which will be set for and implemented in the next 11-15 years, we have been mapping our supply chain and building our long-term business strategy to account for a more resilient supply chain, which includes water-related issues.

W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)

0

Anticipated forward trend for CAPEX (+/- % change)

0

Water-related OPEX (+/- % change)

0

Anticipated forward trend for OPEX (+/- % change)

0

Please explain

There have been minimal changes in our OPEX related to water-related expenditures compared to the previous year as we do not pay direct costs related to water, but rather pay for finished goods. Costs for using water in the production of these goods may be passed along to us but are not something that directly impact us. While we do incur some costs for our sustainability programs that look to create efficiencies in water management and stewardship, this is something we partner with our suppliers on and we do not anticipate any major changes to our cost for participation in these programs.

W7.3

(W7.3) Does your organization use climate-related scenario analysis to inform its business strategy?

	Use of climate-related scenario analysis	Comment
Row 1	No plans for the next two years	

W7.4

(W7.4) Does your company use an internal price on water?

Row 1

Does your company use an internal price on water?

No, and we do not anticipate doing so within the next two years

Please explain

W8. Targets

W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

	Levels for targets and/or goals	Monitoring at corporate level	Approach to setting and monitoring targets and/or goals
Row 1	Company-wide targets and goals Business level specific targets and/or goals Site/facility specific targets and/or goals Brand/product specific targets and/or goals	Targets are monitored at the corporate level Goals are monitored at the corporate level	Gap Inc.'s approach to setting water-related targets and goals is focused on reducing water use in our supply chain, including monitoring consumption and helping improve wastewater quality. By reducing water use in our supply chain, we are reducing our own potential water risk. We support our tier 1 & 2 suppliers in conducting environmental footprint assessments using the Sustainable Apparel Coalition's (SAC) Higg Index. We are also actively monitoring and helping improve wastewater quality at denim laundries through our Water Quality Program, which expects complete compliance with wastewater guidelines. We monitor through reported facility-level results from the Higg Index, and in order to achieve savings, we work with various collaborative initiatives that have measurable water-saving outcomes, such as PaCT, India Water Partnership and Race to the Top. With product-based projects, such as our Washwell processing for our denim, we calculate savings based on baselines for the volume produced. Traditional fabric mills use a great deal of water and chemicals during the dyeing and finishing process, and wastewater must be treated to ensure that both ecosystems and nearby communities are protected. Laundries, especially for denim, also require a great deal of water and pose pollution risks. Gap Inc. is working with fabric mills and laundries to improve practices, and we are pursuing partnerships across our supply chain to reduce water and chemicals use. Our Mill Sustainability Program aims to improve the practices of fabric mills. Our program establishes clear environmental standards, and we are integrating those standards into our sourcing decisions. In 2018, we expanded our program significantly to engage with all our strategic mills, representing the majority of our fabric spend, to meet our goals around water savings and chemical usage. We aim to save 10 billion liters of water in our manufacturing processes by the end of 2020.

W8.1a

(W8.1a) Provide details of your water targets that are monitored at the corporate level, and the progress made.

Target reference number

Target 1

Category of target

Water consumption

Level

Company-wide

Primary motivation

Reduced environmental impact

Description of target

Gap Inc. is working with fabric mills and laundries to improve practices, and we are pursuing partnerships across our supply chain to reduce water and chemicals use. We set and achieved a goal to save 1 billion liters of water in our manufacturing processes by the end of 2017. In 2018, we unveiled a new sustainable manufacturing goal to conserve a total of 10 billion liters of water by the end of 2020. We met this goal in early 2020 through efficiency programs and partnership with our suppliers. Product innovation and efficiency improvements at fabric mills and laundries will be key to achieving these water savings. Progress towards the goal is already underway: since 2014, Gap Inc.-led projects have saved more than 5.7 billion liters of water. We also actively monitor and help improve wastewater quality at denim laundries through our strengthened Water Quality Program, which was first launched in 2004 to help ensure that wastewater from denim laundries is properly treated.

Quantitative metric

Other, please specify (Absolute reduction in water consumption)

Baseline year

2017

Start year

2018

Target year

2020

% of target achieved

97

Please explain

The new manufacturing goal is part of the Gap Inc.'s water stewardship strategy, which includes a focus on lessening the impact at the raw materials and product design level as well as helping communities touched by its business improve access to clean water and sanitation. We achieved and exceeded our first goal, to save 1 billion liters in manufacturing in 2017, and have thus set a more ambitious goal in 2018, aimed at saving 10 billion liters by 2020. By the end of 2019, we were just shy of meeting our goal and reached 10 billion liters of water saved in March of 2020, through efficiency projects and partnership with our suppliers.

W8.1b

(W8.1b) Provide details of your water goal(s) that are monitored at the corporate level and the progress made.

Goal

Engagement with suppliers to reduce the water-related impact of supplied products

Level

Company-wide

Motivation

Water stewardship

Description of goal

Our sustainable manufacturing goal to conserve 10 billion liters of water by the end of 2020 is helping Gap Inc. achieve water security through company-wide water use minimization. This goal is important to Gap Inc. because it involves engagement with our supply chain to reduce the water-related impact of supplied products which is a potential significant risk to our business. Product innovation and efficiency improvements at fabric mills and laundries will be key to achieving these water savings. We are implementing this goal company-wide across our supply chain through our involvement with external programs. We announced that we achieved this goal ahead of target in March 2020. Gap Inc. is also working with other leading brands to advocate for the implementation of more environmentally responsible manufacturing practices. This includes working to help scale the Natural Resources Defense Council (NRDC)'s Clean by Design program, which is focused on helping mills improve their operational efficiencies to reduce water, energy and chemical use, and serving as a founding member of the SAC's Apparel Impact Institute. Gap Inc. is also a member of the Zero Discharge of Hazardous Chemicals (ZDHC) Programme. ZDHC members have made a shared commitment to help lead the industry towards elimination of hazardous chemicals in apparel and footwear product lifecycles by 2020. Additionally, Gap Inc. is a signatory to the United Nations Global Compact CEO Water Mandate.

Baseline year

2017

Start year

2018

End year

2020

Progress

Progress towards the goal is already underway. Using these techniques and conservation measures, we are measuring additional progress with 2017 as a baseline year. We measure progress through calculations of water-saving techniques utilized by product development per unit produced, alongside water-saving projects implemented by supplier and manufacturing partners. We achieved 5.7B liters of water savings by the end of 2018. Through our resource efficiency programs, we collaborate with strategic mills and laundries to significantly reduce their water impacts. In 2018, we worked with a total of 40 mills and 14 laundries. The facilities saw average water use reductions of 20 percent through their implemented efficiency programs. As many water issues are based on local context and needs, we map water risks to help prioritize areas of focus and drive countrywide or basin specific approaches. For one example, we have been collaborating with the Natural Resources Defense Council (NRDC) on its Clean By Design program since 2014, and in 2018, we helped to create the Apparel Impact Institute (AII), which will serve as the program's new home. This program helps mills in China improve their operational efficiency to reduce water, energy, and chemicals use. In 2018, we worked with 14 mills that represent a potential water savings of 1.2 billion liters. To date, we have engaged 20 mills in the Clean By Design program that, together, saved more than 650 million liters of water.

W9. Verification

W9.1

(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?

No, but we are actively considering verifying within the next two years

W10. Sign off

W-FI

(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

W10.1

(W10.1) Provide details for the person that has signed off (approved) your CDP water response.

	Job title	Corresponding job category
Row 1	Chief Legal, Compliance and Sustainability Officer	Other C-Suite Officer

W10.2

(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].

Yes

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission
I am submitting my response	Investors	Public

Please confirm below

I have read and accept the applicable Terms