

Company Name The Gap Inc
Industry Apparel (Supply Chain only)
Overall Score (*) 58.7 out of 100

Theme Score	Out of	For Theme
5.7	10	A. Governance and Policies
14.6	25	B. Embedding Respect and Human Rights Due Diligence
8.3	15	C. Remedies and Grievance Mechanisms
14.2	20	D. Performance: Company Human Rights Practices
10.6	20	E. Performance: Responses to Serious Allegations
5.2	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: In its Human Rights Policy the Company states: "We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We expect our business partners, including suppliers, to adopt and adhere to similar values." In addition to this, the Company website indicates: "We support the principles contained within...the UN Global Compact; the OECD Guidelines for Multinational Enterprises." Met: UNGC principles 1 & 2: See above Met: UDHR: See above Score 2 <ul style="list-style-type: none"> Met: OECD: See above
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: ILO Core: In its Human Rights Policy the Company states: 'We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights [...] and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.' In addition to this, the Company website indicates: 'We are proud to support the principles outlined in the Universal Declaration of Human Rights (UDHR), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO's core conventions.' [Human Rights Policy:

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			<p>gapincustainability.com & Respecting Human Rights, Jul 2019: gapincustainability.com</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: The Company's website indicates: 'We are proud to support the principles outlined in the Universal Declaration of Human Rights (UDHR), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO's core conventions.' [Respecting Human Rights, Jul 2019: gapincustainability.com] • Met: Explicitly list ALL four ILO for AP suppliers: In its Human Rights Policy the Company states: 'We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights [...] and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We expect our business partners, including suppliers, to adopt and adhere to similar values.' Moreover in its Code of Vendor Conduct, which sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc., the Company indicates: 'This Code is based on internationally accepted labour standards and guidance, including the International Labour Organization (ILO)'s core conventions'. With respect freedom of association and collective bargaining, the COVC indicates: 'The facility shall recognize that workers are free to join associations of their own choosing. The facility shall not interfere with workers who wish to lawfully and peacefully associate, organize, or bargain collectively. The facility shall support that the decision whether or not to do so shall be made solely by the workers. The facility shall ensure that workers are free to choose whether or not to lawfully organize and join associations. If freedom of association and/or collective bargaining are restricted by law, workers shall be free to develop parallel means for independent and free association and collective bargaining.' [Human Rights Policy: gapincustainability.com & Code of Vendor Conduct, 2016: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: In the section Respecting Human Rights on the Company's website there are different links where it describe its policies and approaches to ensuring respect for human rights, treating the following themes: Child labour, forced labour, discrimination, freedom of associations (which include collective bargaining). With respect freedom of association and collective bargaining, the Company indicates: 'We understand that workers' opportunities to voice their concerns often depends on other factors, including good relations with management and the support of other workers or a trusted intermediary. We support the rights of workers and employees to freedom of association and collective bargaining through our Human Rights Policy and Code of Vendor Conduct.' [Respecting Human Rights, Jul 2019: gapincustainability.com] • Met: Respect H&S of workers: In its Code of Business Conduct the Company indicates: 'We are committed to providing a safe and healthy working environment for employees, customers, contractors and vendor' [Code of Vendor Conduct, 2016: gapinc.com] • Met: H&S applies to AP suppliers: In its Code of Vendor Conducts the Company states that "The facility shall comply with all applicable laws and regulations regarding working conditions and shall provide workers with a safe and healthy environment." [Code of Vendor Conduct, 2016: gapinc.com] • Not met: working hours for workers: The Company indicates in its website 'Benefits, Scheduling + Safety' that its 'workplace culture and benefits are designed to meet the professional and personal needs of our employees and their families. For retail employees in particular, we improved wages and scheduling practices so that the people who work in our stores experience greater stability and flexibility.' However, CHRB could not find an specific commitment about ILO convention on labour standards on working hours for the Company's workers, or details requirements on maximum regular working hours, maximum regular working hours including overtime and resting periods. [Code of Vendor Conduct, 2016: gapinc.com & Benefits, Scheduling and Safety, Jul 2019: gapincustainability.com] • Not met: Working hours for AP suppliers: In its Code of Vendor Conducts the Company states that "The facility shall set working hours in compliance with all applicable laws. [...] The facility shall comply with all applicable laws, regulations, and industry standards on working hours. The maximum allowable working hours in any week shall be the lesser of a) what is permitted by national law or b) a total of 60 hours of work in any consecutive 7-day period. Although no direct evidence found in relation to normal week hours, it states that 'facility shall ensure that overtime hours not exceed legal limits or 12 hours in a week, whichever is lesser'. However, no requirement for a maximum of 48 regularly scheduled hours could be found. [Code of Vendor Conduct, 2016: gapinc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's Rights: In its Human Rights Policy the Company states: 'we have signed the Women's Empowerment Principles and are implementing them throughout our operations and supply chain.' [Human Rights Policy: gapincsustainability.com] • Met: Migrant worker's rights: In its Code of Vendor Conduct the Company states: 'The facility shall ensure, if it recruits or employs Foreign Contract Workers, that these workers are treated fairly and on an equal basis with its local workers. [...] that migrant workers are not subject to any form of forced, compulsory, bonded, or indentured labour. [...] that all work must be voluntary and workers must be free to terminate their employment at any time, without penalty. [...] that migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up employment or preventing them from voluntarily terminating their employment' [Code of Vendor Conduct, 2016: gapinc.com] • Met: Expecting suppliers to respect these rights: See above [Code of Vendor Conduct, 2016: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: In its Human Rights Policy the Company states: 'we have signed the Women's Empowerment Principles and are implementing them throughout our operations and supply chain.' [Human Rights Policy: gapincsustainability.com] • Not met: Convention on migrant workers: In its Code of Vendor Conduct the Company states: 'The facility shall ensure, if it recruits or employs Foreign Contract Workers, that these workers are treated fairly and on an equal basis with its local workers. [...] that migrant workers are not subject to any form of forced, compulsory, bonded, or indentured labour. [...] that all work must be voluntary and workers must be free to terminate their employment at any time, without penalty. [...] that migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up employment or preventing them from voluntarily terminating their employment'. However there is no direct mention to the Convention on the Protection of the Rights of all Migrant Worker [Code of Vendor Conduct, 2016: gapinc.com] • Met: Respecting the right to water: The Company has a Water Stewardship Program which is addressed to reduce water use, eliminate discharge of hazardous chemicals and work directly with women to improve their access to clean, safe water. In its Global Sustainability Report 2018, the Company indicates: 'Water is essential for our business and the people and communities where we operate. We look for ways to address water impacts throughout our value chain and in communities. [...] Our water stewardship strategy is built on the principle that clean, safe water is both an environmental goal and a basic human right.' Moreover the Company's Code of Vendor Conduct also addressed water issues: 'The facility shall maintain an up-to-date Wastewater Treatment Policy and Procedure. All industrial and domestic wastewater shall be treated to meet the discharge requirements of local laws. In addition, the facility shall comply with all applicable monitoring and reporting requirements. [...]' [2017 Global Sustainability report, 11/2018: https://gapincsustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincsustainability.com & Code of Vendor Conduct, 2016: gapinc.com] • Met: Expecting suppliers to respect these rights: See above [Code of Vendor Conduct, 2016: gapinc.com]
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: In its Human Rights Policy: 'We are committed to conducting ongoing human rights due diligence and to engage with our key stakeholders around the world to continue to improve our approach.' And in its Global Sustainability Report 2017 it indicates: 'We have many key stakeholders: the people who make our clothes, our customers, suppliers and factories, employees, unions, governments, multilateral institutions, NGOs, industry associations, investors, communities and others.' [Human Rights Policy: gapincsustainability.com & 2017 Global Sustainability report, 11/2018: https://gapincsustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincsustainability.com] • Met: Regular stakeholder engagement: In its Global Sustainability Report 2017 there are some example for its latest collaborations with some of these stakeholders. For instance, the Workforce engagement program: 'We launched this

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>program in collaboration with Verité in 2015 to measure and improve the degree to which garment workers feel valued and engaged at work. This program gives workers an opportunity to provide anonymous feedback on key topics, such as supervisor relationships, grievance mechanisms, and training and development opportunities.' [2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: See above [Human Rights Policy: gapinc sustainability.com & 2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability.com]
A.1.5	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: In its Human Rights Policy the Company states: 'Through proactive due diligence aligned with the UN Guiding Principles on Business and Human Rights we seek to avoid adverse human rights impacts and complicity in the adverse impacts caused by others. We are committed to providing access to effective remedy in the event that we cause or contribute to an adverse impact.' [Human Rights Policy: gapinc sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies: See above. However, it does not state that it will refrain from obstructing access to other remedies. [Human Rights Policy: gapinc sustainability.com] • Not met: Collaborating with other remedy initiatives: See above. However, it does not state that it collaborates in initiatives that provide access to remedy. [Human Rights Policy: gapinc sustainability.com] • Met: Work with AP suppliers to remedy impacts: In its Human Rights Policy, the Company states: 'We recognize our responsibility to engage with our business partners to address and remedy adverse impacts and seek to build their capacity to respect human rights through training and engagement.' [Human Rights Policy: gapinc sustainability.com & 2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability.com]
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): In its Code of Business Conduct the Company (COBC) includes a section about its Zero Tolerance For Retaliation policy, which protects any 'employee who reports in good faith a suspected violation of the COBC, our policies or the law, or who participates in any investigation of a suspected violation'. However, there is no reference to HR defenders. [Code of Business Conduct: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AP suppliers to reflect company HRD commitments: In its Code of Vendor Conduct it also indicates: 'The facility shall ensure that such grievance channels and mechanisms for resolving disputes and grievances provide for protection from retaliation.' However these grievance channels are only addressed to workers and do not cover all Human Rights Defenders [Code of Vendor Conduct, 2016: gapinc.com]

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Company's Human Rights Policy is signed by the Company's CEO, Art Peck [Human Rights Policy: gapinc sustainability.com] • Met: Board level responsibility for HRs: In its Human Rights Policy the Company indicates that "'executive oversight and responsibility for the implementation of this policy rests with our Global Sustainability team led by the Sr. Vice President, Global Sustainability. The Governance and Sustainability Committee of the Gap Inc. Board of Directors oversees implementation of this policy at the board level." [Human Rights Policy: gapinc sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: There is a letter from the CEO on how 'Good business can change the world' on the company's website, but the letter does not mention human rights. [CEO Letter: gapinc sustainability.com]

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A.2.2	Board discussions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Board/Committee review of salient HRs: In its Global Sustainability Report 2017, the Company indicates that: 'Gap Inc.'s Board of Directors, particularly the Governance and Sustainability Committee, oversees our Global Sustainability program. The board receives regular updates from Senior Vice President, Global Sustainability, and President, Gap Foundation, David Hayer. He also meets quarterly with Gap Inc. CEO, Art Peck, and regularly with our Executive Vice President of Global Supply Chain and Product Operations. Hayer reports to Executive Vice President and Chief People Officer, Brent Hyder, who reports directly to our CEO.' [2017 Global Sustainability report, 11/2018: https://gapincustainability.com/unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability] Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key AP HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 Met: Senior responsibility for HR: In its Human Rights Policy the Company states: 'executive oversight and responsibility for the implementation of this policy rests with our Global Sustainability team led by the Sr. Vice President, Global Sustainability.' [Human Rights Policy: gapincustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Day-to-day responsibility: in the Company submission to KnowTheChain 2016 the Company describes how resources and responsibilities are allocated: 'The Global Sustainability team is responsible for the implementation of policies and standards. Assessment & remediation specialist assess and validate that suppliers are meeting the code of vendor conduct. The team is led by the Senior Director of the Supplier Sustainability Team, who reports to the VP of Global Sustainability.' [Submission to KnowtheChain 2016, 2016: business-humanrights.org] Met: Day-to-day responsibility for AP in supply chain: See above [Submission to KnowtheChain 2016, 2016: business-humanrights.org]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights Not met: At least one key AP HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: HR risks is integrated as part of enterprise risk system: The Company indicates in its 2017 Global Sustainability Report: 'Gap Inc. has developed systems and procedures focused on identifying and managing risks—including those related to sustainability. [...] Our Global Sustainability team works with business partners and experts to assess the importance of potential social and environmental risks and opportunities for our business and external stakeholders, including suppliers and the people who make our products.'. In addition, in its 10K Form 2017, the Company includes among its identified risks the following: 'the risks to our reputation or operations associated with importing merchandise from foreign countries, including failure of our vendors to adhere to our Code of Vendor Conduct' [The Code of Conduct include human rights provisions] [2017 Global Sustainability report, 11/2018: https://gapincustainability.com/unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability & 10k Form 2017, Mar 2018: sec.gov]

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			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: On its website section 'Managing Risks' the Company indicates: 'In 2016, our Internal Audit team conducted comprehensive risk assessments of the management of social and environmental issues at both tier 1 and tier 2 suppliers. Their goal was to identify risks impacting our business and evaluate the response in place to mitigate those risks. These results have been integrated into our programs [...]'. However, this indicator is about an assessment of the system not the risk itself. [Managing risks: gapinc.sustainability.com]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Communicates its policy to all workers in own operations: Although the Company indicates in its Human Rights Policy that 'All employees are required to complete the Principles of Integrity: Code of Business Conduct Overview training course to ensure their understanding of our commitments.', this document does not contain a commitment to all ILO core nor to the ILO Declaration. CHRB could not find further information about similar actions in order to communicate its Human Rights Policy. [Human Rights Policy: gapinc.sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2. • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Communicating policy down the whole AP supply chain: 'This Code of Vendor Conduct (COVC) applies to all facilities that produce goods for Gap Inc. or any of its subsidiaries, divisions, affiliates or agents. [...] This Code sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc.' In addition, the Code of Vendor conduct indicates that 'vendors shall only use GAP Inc. approved facilities for the production of goods. Vendors shall obtain written authorization from GAP Inc. To use these facilities prior to the start of production'. As indicated below, the code is incorporated in vendor compliance agreement. [Code of Vendor Conduct, 2016: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: Its Code of Vendor Conduct states that 'The facilities that produce goods for Gap Inc. shall operate in full compliance with the laws of their respective countries and with all other applicable laws, rules and regulations as a condition of doing business with Gap Inc. Should there be a difference in the requirements set out by local legislation and those in the Gap Inc. COVC, the more stringent requirement shall apply.' In addition, on its website (section Improving Factory Conditions) the Company indicates: 'our COVC, composed of industry-leading standards and legal requirements, is a living document that defines our standards for working conditions at the facilities that make our products. It is incorporated into our Vendor Compliance Agreement, which is signed by all our branded-product manufacturers.' [Code of Vendor Conduct, 2016: gapinc.com & Improving Factory Working Conditions: gapinc.sustainability.com] • Met: Including on AP suppliers: The Code of Vendor Conduct indicates that the Code 'applies to all facilities that produce goods for Gap Inc. or any of its subsidiaries, divisions, affiliates or agents. [...] This Code sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc. In addition, it states that: 'vendors shall only use GAP Inc. approved facilities for the production of goods. Vendors shall obtain written authorization from GAP Inc. To use these facilities prior to the start of production'. [Code of Vendor Conduct, 2016: gapinc.com]
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Met: Trains relevant AP managers including procurement: In its Submission to 'Know the Chain' from 2016 the Company states that Supplier sustainability team is trained 'to recognize situations where a facility may be using forced or involuntary labour, and is also trained to assess compliance with our company's Foreign Contract Worker Standards'. It also indicates that 'In 2015 we held a number of trainings of our Suppliers Sustainability team (the team responsible for our assessment & remediation, capability building, and workforce engagement

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>programs).' The Company describes other specific training activities carried out during 2015: 'There are also on-going awareness building trainings that the Global Sustainability team delivers to the Global Supply Chain employees pertaining to the COVC (Code of vendor conduct) and how sourcing decision can potentially impact working conditions.' [Submission to KnowtheChain 2016, 2016: business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Monitoring implementation of HR policy commitments • Met: Monitoring AP suppliers: In its Global Sustainability Report 2017 the Company indicates: ' We monitor our suppliers' facilities' adherence to our Code of Vendor Conduct (COVC) before initial approval and then annually, alongside our efforts to build innovative programs that create supportive, empowering workplaces.' In its Sustainability Report 2015-2016 it also describes this assessment: 'Each fiscal year, our team conducts a full assessment for all active manufacturers of our branded product to understand working and labour conditions, facilitate greater partnership with our suppliers and improve sustainability performance. Each assessment includes interviews with managers, confidential interviews with workers, visual observations and reviews of documents and records.[...]. [2017 Global Sustainability report, 11/2018: https://gapincustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability.com & Global Sustainability Report 2015-2016, 2017: gapincustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Met: Describes corrective action process: In its Global Sustainability Report 2017 the Company indicates: 'We use a color-coded system to rate facilities' performance based on assessments. High-performing facilities with no critical or few violations receive a green rating. Average performers are rated yellow, while facilities that need improvement on one or more serious issues are assigned a red rating. [...] In 2017, Gap Inc. set a goal to not work with any red-rated facilities by 2020. We made significant strides toward this goal in 2017 by integrating this work more deeply into our sourcing decisions, concentrating our business with preferred vendors and increasing our investment to help facilities close out COVC violations in a sustainable, responsible way. [...] We also changed our approach to assessing red-rated facilities. Rather than wait one year after our initial assessment to reassess red-rated facilities, we work with them to develop a time-bound corrective action plan and evaluate them again at the end of the agreed-upon timeframe to determine whether they have successfully achieved the required remediation. This approach allows us to work more closely with facility management to ensure that they are making the necessary investments and adjustments to their practices.' The Company discloses figures of non-compliances by issue and country, for example: 1,4% of the assessed facilities 'Does not comply with child labour laws, including working hours and conditions' [2017 Global Sustainability report, 11/2018: https://gapincustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapincustainability.com & COVC Finding and Resolutions 2015-2017: gapincustainability.com] • Not met: Example of corrective action • Met: Discloses % of AP supply chain monitored: In its 'Measuring our progress-Working Conditions' website section, the Company discloses % of supply chain monitored. [Measuring our progress: gapincustainability.com & Improving Factory Working Conditions: gapincustainability.com]
B.1.7	Engaging business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects AP selection of suppliers: Through its Code of Vendor Conduct the Company states a set of minimum requirements in order to do business with a facility. This minimum requirements include ILO core, working hour standards, health and safety, etc. [Code of Vendor Conduct, 2016: gapinc.com] • Met: HR affects on-going AP supplier relationships: According to its Global Sustainability Report 2017: 'In 2017, Gap Inc. set a goal to not work with any red-rated facilities by 2020. [...] We also changed our approach to assessing red-rated facilities. Rather than wait one year after our initial assessment to reassess red-rated facilities, we work with them to develop a time-bound corrective action plan and evaluate them again at the end of the agreed-upon timeframe to determine

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>whether they have successfully achieved the required remediation.' [2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above • Met: Working with AP suppliers to improve performance: An example of how the Company works with its suppliers to improve human rights performance is the Program Better Work, describe on the Company's website: 'Better Work takes an advisory approach to monitoring facilities, with an emphasis on protecting worker rights and well-being by helping companies and governments uphold the ILO's core labour standards and national labour laws. Better Work leads facility assessments and helps address and remediate issues in Vietnam, Cambodia, Indonesia, Bangladesh, Jordan, Haiti, Nicaragua and Lesotho.' [Partnering with Factories: gapinc sustainability.com]
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems: Although the Company indicates that 'We have many key stakeholders: the people who make our clothes, our customers, suppliers and factories, employees, unions, governments, multilateral institutions, NGOs, industry associations, investors, communities and others.' Despite not finding evidence of general system to identify and engage affected stakeholders, the Company reports the case of workers in supply chain: 'In addition to ensuring that peoples who make our clothes work in safe, fair conditions, is crucial that they feel valued and engaged at work. Research has shown that employee engagement enhances worker's sense of well-being, and can also demonstrate positive business outcomes [...] In 2015 we launched our Workforce Engagement Program [...] to measure and improve the degree to which garment workers feel valued and engaged at work, by giving workers an opportunity to provide anonymous feedback on key topics'. The programme is still operative. [Engaging Stakeholders: gapinc sustainability.com & Supplier Partnership, N/A: gapinc sustainability.com] • Not met: Frequency and triggers for engagement: As indicated below, the workforce engagement programme, through surveys, focus groups and interviews, it engages with suppliers' workers. No evidence found specifically about frequency. • Met: Workers in AP SC engaged: In its website 'Supplier Partnership', the Company discloses information about its Workforce Engagement Program: 'We collect information on worker engagement through surveys, focus groups and one-on-one interviews. [...] After two years of implementation with Verité, we began deploying delivery of this program through interactive technology solutions which provide opportunities for workers and management to engage on an app, and for factories to improve their overall human resources practices using technology (i.e. pay stub information on the app, as well as training on the app and survey functionality). We help our suppliers analyze the workforce-related insights to create tailored recommendations they can use to make investments in their employees. This analysis also informs training programs for facility managers, as it serves as the basis for our Supplier Sustainability team to develop tools for facility managers to increase workers' satisfaction, knowledge and overall well-being.' [Engaging stakeholders: gapinc sustainability.com & Supplier Partnership, N/A: gapinc sustainability.com] • Not met: Communities in the AP SC engaged: See above [Engaging stakeholders: gapinc sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: On its Global Sustainability Report 2017 the Company states: 'Our Global Sustainability team works with business partners and experts to assess the importance of potential social and environmental risks and opportunities for our business and external stakeholders, including suppliers and the people who make our products. [...] For these materiality and other risk assessments, we consider such factors as the magnitude, likelihood and time horizon of potential impacts on our business and stakeholders.' In addition, on its website section 'Materiality' it indicates: 'we identified 15 sustainability-related aspects that guide our strategy and grouped them into three categories: Governance & Operating Context; Human Rights & Social Impact; and Resource Use, Scarcity & Impacts.' [2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability & Materiality: gapinc sustainability.com] • Met: Identifying risks in AP suppliers: See above [2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above [2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability] • Met: In consultation with stakeholders: See above [2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability] • Met: In consultation with HR experts: See above [2017 Global Sustainability report, 11/2018: https://gapinc sustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc sustainability] • Met: Triggered by new circumstances: The Company indicates on its Submission 2016 to 'the Chain' that it has a country risk assessment process to evaluate the overall risk level and specific risks in its key sourcing countries: 'Through this country risk assessment, we are able to identify the most salient human rights risks in our key sourcing countries and to develop country-specific strategies to address them.' [Submission to KnowtheChain 2016, 2016: business-humanrights.org]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): On its website section 'Managing Risks', the Company indicates that its Internal Audit team 'prioritizes risks based on the likelihood and severity of their potential impact on meeting the company's strategic initiatives and maintaining business operations. We then monitor these areas for trends. Our executive leadership team and the Board review and sign off on enterprise risk assessments. In addition, our Global Sustainability team works with business partners and experts to assess the importance of potential social and environmental risks and opportunities to our business and external stakeholders, including suppliers and the people who make our products. [...] The team uses tools to help prioritize risks and opportunities, including a sustainability materiality assessment, assessment of representative products and a stakeholder engagement process. For these materiality and other risk assessments, we consider such factors as the magnitude, likelihood and time horizon of potential impacts on our business and stakeholders.' [Managing risks: gapinc sustainability.com] • Met: Public disclosure of salient risks: The Company discloses its key human rights on its website section 'Respecting Human Rights' which are: Child labour and young workers; discrimination and harassment; wages & benefits; Fire & building safety; Grievance mechanisms; Human trafficking and Forced labour; working hours; human treatment; freedom of association; Foreign Contract Workers and Recruitment; Short-Term Contracts and Unauthorized Subcontracting. [Respecting Human Rights, Jul 2019: gapinc sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: In its Human Rights Policy, the Company states: 'The Gap Inc. hotline is made available for employees to raise concerns about potential violations of our Code of Business Conduct. Any concerns are addressed using a robust internal process, and we regularly update our policies and practices based on our findings. At the factory level, we support worker committees where grievances can be expressed, and we check that they are present through our Supplier Sustainability assessment program'. In addition, the Company includes in its website section 'Respecting Human Rights' different links to each of its human rights issues, where there is information about some actions it is implementing. However, further information describing a global system or an Action Plan which summarizes its actions to prevent, mitigate or remediate each salient risks is needed to meet this subindicator. [Human Rights Policy: gapinc.com & Respecting Human Rights, Jul 2019: gapinc.com] • Not met: Including in AP supply chain • Met: Example of Actions decided: On its website the Company describes how it has been working to face one of the most salient human rights issues: Human Trafficking and Forced Labour: 'Risk mapping has identified, in addition to Unauthorized Subcontracting and foreign contract workers, the particular risks that refugee workers may face. For example, 'we know that certain countries from which we source are absorbing Syrian refugees into their formal economies. We are committed to partnering with a broad set of stakeholders to ensure that our vendors have the appropriate capabilities and infrastructure in place to ensure that opportunities for employment and fair, decent working conditions are made available to them. In Jordan, we are partnering with The World Bank on a project emphasizing job readiness training and employment placement for Syrian refugees'. The Company provides examples of action taken in other locations such as Turkey and India. [CA Transparency in Supply Chains Act / UK Modern Slavery Act: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company discloses how it tracks and monitors compliance with its standards and human rights. However, no evidence found in relation to a system to track the actions taken in response to salient issues identified across the Company, and evaluating whether its actions have been effective to handle key issues generally. No additional evidence found in the latest report. [Global Sustainability Report 2015-2016, 2017: gapinc.com & 2017 Global Sustainability report, 11/2018: https://gapinc.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc.com] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: The Company communicates its process to identify human rights risks including own operations and supply chain. (See B.2.1) [2017 Global Sustainability report, 11/2018: https://gapinc.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx# 1,10478,10565,0,,gapinc.com & Submission to KnowtheChain 2016, 2016: business-humanrights.org] • Met: Comms plan re assessing risks: The Company communicates its process to assess its human rights risks and define its salient human rights issues. (See B.2.2) [Managing risks: gapinc.com & Respecting Human Rights, Jul 2019: gapinc.com] • Not met: Comms plan re action plans for risks: Although the Company communicates examples of actions taken to remediate and prevent some of its human rights issues, no evidence found of it communicating/demonstrating having a global system to take action to prevent, mitigate or remediate its salient human rights issues. (See B.2.3) • Not met: Comms plan re reviewing action plans • Not met: Including AP suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: On its Code of Business Conduct the Company indicates that there is a COBC Hotline which is 'free, confidential and available online and by telephone, 24 hours a day, seven days a week, around the world (interpreters are available).' [Code of Business Conduct: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: See above [Code of Business Conduct: gapinc.com] • Met: Expect AP supplier to have equivalent grievance systems: On its Code of Vendor Conduct the Company indicates: 'The facility shall ensure that workers have means to report grievances to management, including a channel that provides for confidentiality and anonymity. The facility shall also ensure workers can bring to management's attention grievances through means other than their immediate supervisor. The grievance system shall include addressing grievances in a timely manner and documenting grievances and management action on grievances.' [Code of Vendor Conduct, 2016: gapinc.com] • Not met: Opens own system to AP supplier workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states in its Code of Business Conduct that there is a COBC Hotline which is 'free, confidential and available online and by telephone, 24 hours a day, seven days a week, around the world (interpreters are available)' and in its website section 'Acting with Integrity' that the COBC Hotline is available not only to employees but also 'anyone who conducts business with Gap Inc. or is affected by our business'. [Code of Business Conduct: gapinc.com & Acting with integrity: gapincustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The COBC Hotline is free, confidential and available online and by telephone, 24 hours a day, seven days a week, around the world (interpreters are available). The company clarifies that "it may take up to 3 minutes to arrange for an interpreter". [Code of Business Conduct: gapinc.com] • Not met: Expects AP supplier to have community grievance systems: On its Code of Vendor Conduct the Company states that suppliers' facilities 'shall ensure that workers have means to report grievances to management, including a channel that provides for confidentiality and anonymity'. However it is not clear whether these channel are available for external individuals or communities. [Code of Vendor Conduct, 2016: gapinc.com] • Not met: AP supplier communities use global system: See above [Code of Vendor Conduct, 2016: gapinc.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages users to create or assess system: About its Workforce Engagement Program, the Company reports in its website: 'The goal of the program has been to measure and improve the degree to which garment workers feel valued and engaged at work, by giving workers an opportunity to provide anonymous feedback on key topics such as supervisor relationships, grievance mechanisms, and training and development opportunities.' [Supplier Partnership, N/A: gapincustainability.com] • Not met: Description of how they do this: Although the Company indicates that the workplace engagement programmes ask for feedback in relation to grievance mechanisms, no further details found. [Supplier Partnership, N/A: gapincustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Engages with users on system performance: See above, engagement takes place with workers in the supply chain through anonymous feedback requests. [Supplier Partnership, N/A: gapincustainability.com] • Not met: Provides user engagement example on performance • Met: AP suppliers consult users in creation or assessment: See above [Supplier Partnership, N/A: gapincustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales • Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: On its Code of Business Conduct there is a 'Zero tolerance to retaliation' section, where it states: 'We do not tolerate retaliation against any employee who reports in good faith a suspected violation of the COBC, our policies or the law, or who participates in any investigation of a suspected violation. Managers are prohibited from taking an adverse employment action against an employee for raising a COBC or legal concern' [Code of Business Conduct: gapinc.com] • Met: Practical measures to prevent retaliation: The Company has implemented a COBC Hotline which is 'is free, confidential and available online and by telephone, 24 hours a day, seven days a week, around the world (interpreters are available). You may choose to report a concern anonymously. Anyone who reports a concern in good faith is protected from retaliation'. [Code of Business Conduct: gapinc.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AP suppliers to prohibit retaliation: On its Code of Vendor Conduct the Company states that suppliers' facilities "shall ensure that workers have means to report grievances to management, including a channel that provides for confidentiality and anonymity. [...] The facility shall ensure that such grievance channels and mechanisms for resolving disputes and grievances provide for protection from retaliation'. However it is not clear whether these channels are available for external individuals or communities. [Code of Vendor Conduct, 2016: gapinc.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable): The Company sent a letter to BHRRC responding to the allegations supplier Avery Dennison is undermining trade union rights & failing to pay contract workers full entitlements. In its response letter, the Company indicates: 'Over the past twelve months, we have sought to encourage Avery Dennison and the labor organizations and unions representing these workers to engage in good-faith dialogue to fully and sustainably resolve the issues that were highlighted in the International Union League for Brand Responsibility's letter. That the process has been so slow-moving has been of deep frustration to us, which is why we have sought to work with other Avery Dennison customers, as well as the Ethical Trade Initiative, to expedite a resolution. To that end, on August 16th, The Ethical Trade Initiative, at the request of its members, facilitated a meeting between New Trade Union Initiative (NTUI)/Garment and Textile Workers Union (GATWU) and Avery Dennison, with the expectation that the parties pursue a structured mediation process to resolve the issues raised by NTUI/GATWU. Both parties agreed to pursue such a process to discuss [...] and discloses the outcomes of that process. However, ETI is not considered a state-based non-judicial mechanism. No evidence found of the Company providing an example (itself) of issues resolved through state-based non-judicial mechanism, nor indicating the process by which it will cooperate with such mechanisms. [Gap Inc. Response to Union letter of 26 Jul 2018, Ag 2018: business-humanrights.org]
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: On its website page 'Child Labor and Young Workers', the Company indicates: 'In the rare event that we encounter child labor at an approved facility, we take immediate action to resolve the issue, including: removing young workers from the facility; making sure workers have access to education or appropriate training, receive an ongoing wage and are guaranteed a job if they choose to work at the facility when they are older; requiring the offending supplier to pay for all remediation costs'. It also describes the case of 'Samie's Finishing House': 'While Gap Inc. had no direct involvement

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>with Samie’s Finishing House, we wanted to help the 10 children who were found working there. Eight of them, ranging in age from 12 to 15 years old, agreed to accept our offer to help them go to school. We commissioned Impactt, an organization specializing in ethical trade and human rights, to implement the remediation program.</p> <p>Impactt met with the children and their families in the Dhokin Khan slum area of Dhaka, helped the children enrol in school, and conducted follow-up visits. The children and their parents reported that their lives have improved significantly since the children started school [...] [Child Labor and Young Workers: gapinc sustainability.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: The company provides the response to Business & Human Rights Resource Center regarding the allegations of gender based violence in its Asian supply chains. The Company indicates: 'To help us advance that commitment, we’ve sought to reconfigure our supply base to focus on partners that share our sustainability values and goals. Over the past two years, we have also significantly increased the number of factories we source from that are assessed by ILO’s Better Work program.' In addition, the Company indicates: 'we have initiated a dialogue with some of our key implementing partners, among them CARE, ILO Better Work, and Verité, to discuss how our industry can accelerate its effort to address this global, systemic issue.' [Gap response to allegations of gender based violence in Asian supply chain, Jun 2018: business-humanrights.org] • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.2.2	Aligning purchasing decisions with human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs: On its website section 'Improving Factory Working Conditions' the Company indicates: 'Consumer trends and expectations are placing greater demands on production timelines and capabilities—which can ultimately affect the individuals working in the garment industry. To help manage these broad shifts in the industry, we continue to integrate policies and programs into our core business and form partnerships across the apparel industry to ensure that the people in our supply chain work in safe, fair conditions. [...] In recent years we have taken steps to: [...], consolidate our supplier base so that we are working more closely with fewer suppliers. Today, we are working with 25% fewer suppliers than we were five years ago.' In addition, in its submission to 'Know the Chain' in 2016, the Company stated: 'we conduct a capacity analysis prior to authorizing a facility for production, which allows us to evaluate whether a facility has the necessary equipment and number of lines to produce the quantity of the product ordered, without subcontracting.' [Improving Factory Working Conditions: gapinc sustainability.com & Submission to KnowtheChain 2016, 2016: business-humanrights.org] • Met: Positive incentives to respect human rights: The Company indicates on its website section 'Improving Factory Working Conditions' that it has consolidated its supplier base so that it is working more closely with fewer suppliers (25% fewer suppliers than 5 years ago). According to its website it uses 'a color-coded system to rate facilities' performance based on assessments. High-performing facilities with no critical or few violations receive a green rating. Average performers are rated yellow, while facilities that need improvement on one or more serious issues are assigned a red rating.' The Company has the following goal: 'Achieving a sustainability rating of green or yellow for all Tier 1 suppliers by 2020'. [Improving Factory Working Conditions: gapinc sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.3	Mapping and disclosing the supply chain	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Identifies suppliers back to product source: The Company states in the 'Know the Chain' document that: 'Gap monitors all first tier supplier facilities (and those of approved subcontractors) for forced labour and human trafficking'. [Submission to KnowtheChain 2016, 2016: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> Met: Discloses significant parts of supply chain and why: On its website section 'Respecting Human Rights' the Company indicates that 'Twice a year, we publish our approved list of facilities, which includes cut-and-sew facilities, embroideries and laundries'. [Respecting Human Rights, Jul 2019: gapinc.sustainability.com & Factory List - Nov 2018, Nov 2018: gapinc.sustainability.com]
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Child Labour rules in codes or contracts: On its Code of Vendor Conduct the Company indicates: 'No workers under the age for mandatory schooling shall be employed by the facility. Facility management shall have a rigorous age verification procedure [...]'. In addition, on its website section 'Child Labour and Young Workers' the Company states: 'In the rare event that we encounter child labour at an approved facility, we take immediate action to resolve the issue, including: removing young workers from the facility, making sure workers have access to education or appropriate training, receive an ongoing wage and are guaranteed a job if they choose to work at the facility when they are older requiring the offending supplier to pay for all remediation costs' [Code of Vendor Conduct, 2016: gapinc.com & Child Labor and Young Workers: gapinc.sustainability.com] Met: How working with suppliers on child labour: On its website section 'Child Labour and Young Workers' the Company describe two cases which show its works with suppliers to eliminate child labour and to improve working conditions for young workers: Uzbek Cotton case and Samie's Finishing House [Child Labor and Young Workers: gapinc.sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Both requirements under score 1 met Met: Provide analysis of trends demonstrating progress: The Company discloses percentage of compliance for several reporting years (2011-2017). According to the data disclosed, the percentage of factories with findings related to Child Labour issues has decreased in the last years. [COVC Finding and Resolutions 2015-2017: gapinc.sustainability.com & Working Conditions Data / 2011-2014: gapinc.sustainability.com]
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Debt and fees rules in codes or contracts: On its Code of Vendor Conduct the Company has included different sections about debt bondage guidelines, for example: 'The facility shall pay all fees and costs payable to the host government for the documentation of Foreign Contract Worker's employment in the host country, including any levies, fees for work permit, and fees for renewing work documents. The facility shall not at any point deduct from wages, charge workers, or otherwise accept reimbursements to re-coup these fees. The facility or the recruitment agency shall not collect from Foreign Contract Workers a deposit or bond or withhold part of Foreign Contract Workers' earnings at any point of their employment.', or 'The facility shall allow workers full and complete control over earnings and shall not withhold any 'guarantee money' or recruitment fee sums from pay otherwise due to Foreign Contract Workers.' In addition, on its website, the Company states: 'In cases where a local contractor or hiring agent may be involved in the hiring of domestic migrant workers, the cost is borne by the employer and not the worker.' Assuming that 'domestic migrant workers' refer to all workers (national's moving within the country to get the job or foreign moving into the country). [Code of Vendor Conduct, 2016: gapinc.com & Foreign Contract Workers and Recruitment, Jul 2019: gapinc.sustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How working with suppliers on debt & fees: On its website special section 'CA Transparency in Supply Chains Act / UK Modern Slavery Act' the Company states that it 'works to build the capabilities of our suppliers by conducting worker trainings, participating in multi-stakeholder initiatives, and forging partnerships with expert stakeholders and suppliers to address specific human rights issues. Gap Inc. has helped suppliers improve their capabilities for more than a decade, and created field teams for social & labour capability building that are dedicated to helping suppliers manage and improve the sustainability of their own operations.' However no specific information or examples were found about how the Company works with suppliers on debt & fees issues [CA Transparency in Supply Chains Act / UK Modern Slavery Act: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made: Although the Company discloses some figures for 2015-2017, there are no specific information about these issues and there is no analysis of the results [COVC Finding and Resolutions 2015-2017: gapincustainability.com]
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: On its Code of Vendor Conduct the Company indicates: 'The facility shall not employ tactics to prevent workers from leaving at will, such as withholding salary as a 'year-end bonus' or charging a penalty when workers terminate their contract, or by withholding any personal identification documents such as IDs and passports.[...] The facility shall ensure that workers are allowed to leave freely at the end of the shift or during the shift under extenuating circumstances like illness or family emergencies.' [Code of Vendor Conduct, 2016: gapinc.com] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: On its website special section 'CA Transparency in Supply Chains Act / UK Modern Slavery Act' the Company states that it 'works to build the capabilities of our suppliers by conducting worker trainings, participating in multi-stakeholder initiatives, and forging partnerships with expert stakeholders and suppliers to address specific human rights issues. Gap Inc. has helped suppliers improve their capabilities for more than a decade, and created field teams for social & labour capability building that are dedicated to helping suppliers manage and improve the sustainability of their own operations.' However no specific information or examples were found about how the Company works with suppliers on free movement issues. The Company discloses an example regarding the Sumangali Scheme. However, in order to be considered relevant, information needs to refer to the last three reporting years. [CA Transparency in Supply Chains Act / UK Modern Slavery Act: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Met: Provide analysis of trends in progress made: The Company discloses data for the last three reporting years including 'foreign contract workers do not have required travel and/or work documents', 'uses involuntary labor', and 'imposes restrictions to voluntarily ending employment'. [COVC Finding and Resolutions 2015-2017: gapincustainability.com & Working Conditions Data / 2011-2014: gapincustainability.com]
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: On its website section 'Freedom of Association' the Company indicates that its 'COVC explicitly supports freedom of association and the rights of workers to lawfully and peacefully associate, organize and bargain collectively.' And on its COVC the Company states: 'The facility shall recognize that workers are free to join associations of their own choosing. The facility shall not interfere with workers who wish to lawfully and peacefully associate, organize, or bargain collectively. The facility shall support that the decision whether or not to do so shall be made solely by the workers. [...] The facility shall not threaten, penalize, restrict, or interfere with workers lawful efforts to join associations of their choosing, carry out their union activities including union meetings, demonstrations, and lawful strikes.'" [Freedom of Association: gapincustainability.com & Code of Vendor Conduct, 2016: gapinc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on FoA and CB: An example of the work that the Company is doing with suppliers is the Workshop on Freedom of Association & Dispute Prevention & Resolution: 'On January 30, 2018, the one-day workshop on Freedom of Association and Dispute Prevention and Resolution to all Gap's suppliers at InterContinental Hotel Phnom Penh with the participants from 47 factories in Phnom Penh and nearby provinces in total there were 183 representatives of employers and employees. <p>The workshop was co-organized by the Arbitration Council Foundation, International Labour Organization – Better Factories Cambodia (ILO-BFC) and Gap Inc. and funded by Gap Inc. This workshop focused on discussion of the importance topics as: FOA, Labour Dispute Resolutions and the Arbitration Council and Workplace Cooperation.' [Workshop on Freedom of Association & Dispute Prevention & Resolution - The Arbitration Council, 11/10/2018: arbitrationcouncil.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Met: Provide analysis of trends in progress made: The Company discloses percentage of cases found related to blocking 'attempts to organize'. For the last three reporting years for different countries and overall. [COVC Finding and Resolutions 2015-2017: gapinc.com & Working Conditions Data / 2011-2014: gapinc.com]
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: On its Code of Vendor Conduct the Company has included a specific section about 'Occupational Health and Safety' which covers health and safety requirements: 'The facility shall comply with all applicable laws and regulations regarding working conditions and shall provide workers with a safe and healthy environment'. [Code of Vendor Conduct, 2016: gapinc.com] • Not met: Injury rate disclosures: In its website section 'Measuring Progress-Employees' publishes data on workplace health and safety, including injury rates, fatalities. However the data cover only the U.S. However, this indicator looks for evidence of injury rate disclosures in supply chain. [Measuring our progress: gapinc.com] • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures: See above [Measuring our progress: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: On its website section 'Fire and Building Safety' the Company explains its actions in order to face a relevant safety issue for its facilities. It also includes an example: 'In the first quarter of 2018, we worked with engineers to conduct fire and electrical safety assessments in 20 of our approved facilities in Cambodia. We are now working with expert engineers and our suppliers to implement corrective action plans, in order to build the capacity within their operations to appropriately mitigate and manage fire and electrical safety risks. We are also evaluating the need to conduct additional assessments in our suppliers' other manufacturing facilities in the country.' [Fire & Building Safety: gapinc.com] • Met: Provide analysis of trends in progress made: The company discloses percentage of non-compliance for health and safety-related indicators for the last three reporting years. [COVC Finding and Resolutions 2015-2017: gapinc.com & Working Conditions Data / 2015-2016 Findings and Resolution: gapinc.com]
D.2.8.b	Women's rights (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights in codes or contracts: Although the Code of Vendor Conduct includes the following guidelines related to Women's rights: 'The facility shall hire, promote, pay wages and benefits, terminate, and provide access to trainings, without regard to race, colour, gender, nationality, religion, age, maternity, marital status, indigenous status, ethnicity, social origin, disability, sexual orientation, HIV/AIDS status, or membership in workers organizations including unions or political affiliation. The facility shall ensure that hiring, promotion, and other human resource decisions shall be made on the workers' qualifications, skills, ability, productivity, and overall job performance.', 'Workers with the same qualifications, skills, experience, and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>performance shall receive equal pay for equal work in accordance with applicable labor laws', 'The facility shall ensure that hiring notices and job descriptions do not specify discriminatory factors, such as gender, age, race, etc', 'The facility shall ensure that pregnancy shall not be used as a basis for discriminatory practices like termination/demotion/pay cuts etc', 'PREGNANT AND BREASTFEEDING WOMEN. The facility shall take all required measures to ensure the health and safety of groups of workers with special requirements.', 'The facility shall not engage in or permit psychological coercion or any other form of non-physical abuse, including threats of violence, sexual harassment, screaming, or other verbal abuse'. [Code of Vendor Conduct, 2016: gapinc.com]</p> <ul style="list-style-type: none"> • Met: How working with suppliers on women's rights: In its Global Sustainability Report, the Company describes how it addressed the problem of Sexual Harassment in India: '[Our] team is working with our suppliers in India — covering over 100,000 workers — to help them build an environment where they clearly define and implement policies on Prevention of Sexual Harassment (POSH) and create an Internal Complaints Committee, both of which are required under Indian law, though inadequately enforced. We aim to help our suppliers raise awareness among both male and female employees about this issue, and about their rights and responsibilities under the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act of 2013.' [2017 Global Sustainability report, 11/2018: https://gapincustainability.com unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx#1,10478,10565,0,,gapincustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.2.9.b	Working hours (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Working hours in codes or contracts: In its Code of Vendor Conducts the Company states that "The facility shall set working hours in compliance with all applicable laws. [...] The facility shall comply with all applicable laws, regulations, and industry standards on working hours. The maximum allowable working hours in any week shall be the lesser of a) what is permitted by national law or b) a total of 60 hours of work in any consecutive 7-day period. Although no direct evidence found in relation to normal week hours, it states that 'facility shall ensure that overtime hours not exceed legal limits or 12 hours in a week, whichever is lesser'. However, no requirement for a maximum of 48 regularly scheduled hours could be found. [Code of Vendor Conduct, 2016: gapinc.com] • Met: How working with suppliers on working hours: On its website section about 'Working hours', the Company indicates: 'we participated in a program to improve our understanding of how our purchasing choices can lead to better outcomes. As part of Better Buying's beta test, we enlisted suppliers from South Korea, Sri Lanka and Hong Kong to evaluate our purchasing practices and provide feedback on their impacts. Using the results of that project, we will seek to incorporate insights into our core business operations, such as improved forecasting and giving appropriate lead times. [...] we have created a team devoted solely to capacity planning. This allows us to build more balanced purchase orders and ultimately help our suppliers improve how they manage their own operations such that we can address the issue of working hours.' [Working Hours, Jul 2019: gapincustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Met: Provide analysis of trends in progress made: The Company discloses figures for more than 2 reporting periods and different indicators. For instance, the percentage of facilities which did not provide 1 day off in 7 to their employees increased from 15,5% in 2011 to 30,9% in 2017 [COVC Finding and Resolutions 2015-2017: gapincustainability.com & Working Conditions Data / 2011-2014: gapincustainability.com]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Workers at suppliers for H&M, Zara and Gap were allegedly abused. • Area: Working Hours: excessive overtime • Story: A report published in 2016 by Students and Scholars Against Corporate Misbehaviour (SACOM) alleged that workers at suppliers for Gap, H&M and Zara were forced to work excessive hours to meet unreasonably tight delivery schedules. SACOM conducted undercover investigations inside four factories belonging to suppliers of GAP, H&M, and Zara in China. SACOM claimed to have found a considerable disparity between the brands' supplier factory CSR policies and the reality in their Chinese suppliers' factories. <p>SACOM also claimed that while the brands required their supplier factories to pay wages which can meet workers' basic financial needs, its investigation found wages were meagre. The investigation also uncovered that workers in some factories were exposed to toxic chemicals, cotton dust and other hazardous dusts without protective gear, and that worker representation in collective bargaining situations was poor.</p> <ul style="list-style-type: none"> • Sources: [SACOM Website - 19/07/2016: #sacom.hk][Business & Human Rights Resources Center - 18/07/2016: business-humanrights.org]
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The Company reports in a detailed way on its position to the case <p>"We have taken the SACOM report seriously and our Supplier Sustainability team has conducted full investigations into the two facilities named in the report. For the issues raised in the report that were validated and found to be true, we are working with our suppliers to develop time-bound action plans to resolve them, and address their root causes to ensure sustainable improvements are made. We will also be partnering with the other buyers that work with these suppliers to conduct follow-up visits to validate that all issues identified are fully resolved, and will seek to ensure that the improvements made are sustained in the future."</p> <p>The company sent a detailed report to the Business & Human Rights Resource Center where it clarifies its position on the case.</p>
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company states that its Code of Vendor Conduct 'sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc'. All four core ILOs requirements are covered under the code, as well as health and safety, wages and work hours. 'The facility shall comply with all applicable laws, regulations, and industry standards on working hours. The maximum allowable working hours in any week shall be the lesser of a) what is permitted by national law or b) a total of 60 hours of work in any consecutive 7-day period...The facility shall allow workers at least one day off in seven days, or the local legal standard if more stringent. A day off must be at least 24 hours of continuous rest.' <p>The Company states that the policies contained in the Code of Vendor Conduct 'sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc.'</p>
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Met: Has reviewed management systems to prevent recurrence: The company has indicated "our Supplier Sustainability team has conducted full investigations into the two facilities named in the report. For the issues raised in the report that were validated and found to be true, we are working with our suppliers to develop time-bound action plans to resolve them, and address their root causes to ensure sustainable improvements are made. We will also be partnering with the other buyers that work with these suppliers to conduct follow-up visits to validate that

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>all issues identified are fully resolved, and will seek to ensure that the improvements made are sustained in the future."</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: SOMO report accuses large clothing brands such as H&M, Gap, VF of having their clothes made in Bangladesh by suppliers where working hours exceed 60 hours a week • Area: Working hours • Story: A 2017 report by the Centre for Research on Multinational Corporations (SOMO) has accused clothing brands such as Gap, H&M and VF of having their clothes made in Bangladesh by suppliers where working hours exceed 60 hours a week. Working weeks exceeding 60 hours were reported at eight factories of companies supplying brands including: C&A, H&M, VF Corporation, Gap and Kmart. Some workers were reportedly being forced to do additional overtime, having to regularly work until midnight and being paid for additional hours separately in cash. Even when overtime payments were included in the wages, not one of the interviewed workers earned a living wage. The average total take-home salary was only a third of what would constitute a living wage. • Sources: [SOMO Report 'Branded childhood', January 2017 -: #somo.nl]
E(2).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: As far as CHRB was able to ascertain, the Company has not responded publicly to the allegation. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company states that its Code of Vendor Conduct 'sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc.'. All four core ILOs requirements are covered under the code, as well as health and safety, wages and work hours. 'The facility shall comply with all applicable laws, regulations, and industry standards on working hours. The maximum allowable working hours in any week shall be the lesser of a) what is permitted by national law or b) a total of 60 hours of work in any consecutive 7-day period...The facility shall allow workers at least one day off in seven days, or the local legal standard if more stringent. A day off must be at least 24 hours of continuous rest.' <p>The Company states that the policies contained in the Code of Vendor Conduct 'sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc.'</p>
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Report finds female migrant workers are subjected to conditions of modern slavery in factories supplying to many brands • Area: Forced Labour - restriction of movement • Story: On February 28, 2018, the Business & Human Rights Resource Centre website reported on a study conducted by the India Committee of the Netherlands, Clean Clothes Campaign and Garment Labour Union. The report 'Labour without Liberty' looked into the living conditions in Bangalore garment factory hostels and the particular challenges migrant workers face. It found that five out of the eleven ILO (International Labour Organization) indicators for forced labour exists in the Bangalore garment industry: abuse of vulnerability, deception as a result of false promises (wages etc.), restriction of movement in the hostel, intimidation and threats, and abusive working and living conditions. The report identifies two companies, Company 1 & Company 3 as supplying a number of major fashion brands, including Gap. Connected to these Companies are 'hostels', living quarters for workers located nearby the factory they work at. Women who

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>lived at these hostels complained that their movement was restricted by the factory employees and hostel authorities. At Company 1 the women were escorted from the factory back to the hostel in the afternoon and were banned from leaving the hostel during weekday evenings. On Sunday's they were allowed to leave the hostel unaccompanied, however this was only between the hours of 4pm to 7pm. At Company 3, women were only allowed to leave the hostel for a total of 3 hours on Sunday, between 12pm and 7pm, on all other days they had to be back inside the hostel by 7pm. Additionally, hostel authorities would not allow the families of the women to enter the hostel when they came to visit, and the use of mobile phones was only permitted between 8.30pm - 9.30pm at night. While some of these aspects are also felt by the local workforce, they were more strongly experienced by migrant workers. According to the report, the factories studied produce for C&A, Columbia, Decathlon, Gap, H&M, PVH, Marks & Spencer, Abercrombie & Fitch, Benetton and Levi Strauss.</p> <ul style="list-style-type: none"> • Sources: [Business & Human Rights Resource Centre - 28/02/2018: #business-humanrights.org][Clean Clothes Campaign - 26/01/2018: cleanclothes.org]
E(3).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The company has publicly responded to the allegations on the BHRRC website. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company responds in detail to the allegations raised in the report, including an explanation of engagement that has been undertaken since the data within the report was gathered. It acknowledges more action is required to protect the rights of migrant workers and sets out in detail the approach Gap has adopted to respond to the issue. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org]
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company has a Human Rights policy committing it to respecting the human rights principles covered in this allegation such as working conditions and female empowerment, and also extends these requirements through its supply chain through the Business Code of Conduct and Code of Vendor Conduct [Code of Business Conduct: gapinc.com & Human Rights Policy: gapincsustainability.com] • Met: Policies apply to the type of business relationships involved: The company says its Code of Vendor Conduct " applies to all facilities that produce goods for Gap Inc. or any of its subsidiaries, divisions, affiliates or agents. Gap Inc. recognizes that there are different legal and cultural environments in which facilities operate throughout the world. This Code sets forth the basic requirements that all facilities must meet in order to do business with Gap Inc." This policy applies to the factory who the allegation relates to [Human Rights Policy: gapincsustainability.com & Code of Vendor Conduct, 2016: gapinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company's 'Code of Vendor Conduct' states that "The facility shall ensure that if entrances are guarded for security reasons, workers shall have free egress at all times." and also that "The facility shall ensure that beyond reasonable restrictions, workers can move freely within the facility to use the toilets, drink water, and take designated breaks. " These policies address the specific rights in question [Code of Business Conduct: gapinc.com & Code of Vendor Conduct, 2016: gapinc.com]
E(3).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: The company says it has engaged in a dialogue with stakeholders; "Our teams have engaged extensively with our suppliers in South India, and have conducted offsite and onsite interviews with workers to inform our recommendations on how our suppliers should address the issues highlighted in the report." However, They have not engaged with the women who were affected or similar type (women in the same working and living conditions in the same region) [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] • Met: Encourages linked business to engage affected stakeholders: The company says "We have required our suppliers to form a Hostel Committee to address the issues identified through our own assessments and in ICN's report, including freedom of movement within hostels. We have further encouraged our suppliers to engage with independent and credible NGOs that can help manage these

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>hostels." [Response to Bangalore allegations, 19/02/2018: business-humanrights.org]</p> <ul style="list-style-type: none"> • Not met: Provides remedies to affected stakeholders: No evidence provided that the company has provided remedy to those women whose freedom of movement was restricted by the hostels they were staying at. Relevant grievance mechanisms have not yet been established. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] • Met: Has reviewed management systems to prevent recurrence: The company states that "We are implementing our Workplace Cooperation Program in Southern India. This program is focused on helping establish functioning grievance mechanisms and harmonious industrial relations through social dialogue". This can be considered evidence it has reviewed management systems. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: No evidence that of remedy being provided to the victims, nor that the victims have accepted any such remedy. • Met: Has improved systems and engaged affected stakeholders: The company says it is implementing a multipronged approach to address the issues reported at the hostels and supplier operations. These include engagement with hostels to improve their practices and address issues highlighted by the report. They are also implementing a Workplace Cooperation Program in south India to establish functioning grievance mechanisms and also a P.A.C.E program, to provide female garment workers with professional and life skills training. [Response to Bangalore allegations, 19/02/2018: business-humanrights.org]
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: Gap criticized for failing to address supply chain issues in Bangladesh, Cambodia, and elsewhere • Area: Discrimination • Story: In May 2018, a global coalition of trade unions, worker rights and human rights organizations published reports on Gender Based Violence among supply chains in Bangladesh, Cambodia, India, Indonesia, and Sri Lanka. It is based on interviews with more than 215 workers employed in 21 factories that supply to Gap, H&M and Walmart. The reports revealed a range of human rights violations, focusing on women who work in supply chains. <p>In Bangladesh, women employed in Gap, H&M and Walmart supplier factories reported that it is common for supervisors and managers to pursue sexual relationships with women workers by offering benefits including salary increases, promotions, and better positions. In addition, there is the risk of sexual harassment from male mechanics tasked with fixing their machines. In Indonesia, women employed by a Gap supplier factory report male mechanics demanding sexual favours in return for fixing their machines which they need to meet their work targets. Women working for a Gap supplier factory In Sri Lanka report that they are particularly vulnerable to sexual harassment by their supervisors when they stand in line to clock-in and clock-out using biometric fingerprinting machines. Furthermore, the report states that there werer 4 cases of sexual violence, including rape, in Gap supplier factories in Cambodia. In addition, Workers from four Gap supplier factories in Gurugram (Gurgaon), India reported that women are routinely fired from their jobs during their pregnancy. Permanent workers report being forced to take leaves without pay for the period oftheir pregnancy.</p> <ul style="list-style-type: none"> • Sources: [Gap website, 13/06/18: globallaborjustice.org][Global Labour Justice, 13/06/18: globallaborjustice.org][Global Labour Justice, 23/05/16: #globallaborjustice.org]
E(4).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The Company states "We are deeply concerned by the allegations raised in this report, and our Global Sustainability team is currently conducting additional due diligence to investigate and address the allegations raised within it." [Gap response to allegations of gender based violence in Asian supply chain, Jun 2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail [Gap response to allegations of gender based violence in Asian supply chain, Jun 2018: business-humanrights.org & Report on gender based violence in Asian supply chains, May 2018: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(4).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: In its Human Rights Policy the Company states: 'We are committed to respecting all human rights, as articulated in the Universal Declaration of Human Rights [...] and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.' In addition to this, the Company website indicates: 'We are proud to support the principles outlined in the Universal Declaration of Human Rights (UDHR), the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the ILO's core conventions.' [Human Rights Policy: gapinc.sustainability.com & Respecting Human Rights: gapinc.sustainability.com] • Met: Policies apply to the type of business relationships involved: The policy also applies to the Company's business partners. [Human Rights Policy: gapinc.sustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: In its code of business conduct, the company prohibits discrimination against pregnant women. It also prohibits engagement in or permission of 'psychological coercion or any other form of non-physical abuse, including threats of violence, sexual harassment, screaming, or other verbal abuse'. However, The report on gender based violence in 2018 claims that 'Gap's failure to assess industry and supplier related risks in their supply chain prevents Gap from taking any measures to avoid adverse human rights impacts among their producers. Further, by failing to make these critical assessments, Gap turns a blind eye to adverse human rights impacts directly linked to their products.' [Code of Business Conduct: gapinc.com & Report on gender based violence in Asian supply chains, May 2018: business-humanrights.org]
E(4).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: CHRB did not find evidence of the Company's engagement with affected stakeholders. [Gap response to allegations of gender based violence in Asian supply chain, Jun 2018: business-humanrights.org] • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies. • Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company engaging with stakeholders followed by the case.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.2 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, The Gap Inc made data public that met one or more elements of the methodology in 32 cases, leading to a disclosure score of 3.2 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: In its Global Sustainability Report the Company indicates: 'We sought to prepare this report in accordance with the Global Reporting Initiative (GRI) Standards: Core option.' [2017 Global Sustainability report, 11/2018: https://gapinc.sustainability.com/unidad\CHRB\CHRB Research 2019\Old companies list of Disclosure - Easy format.docx#1,10478,10565,0,,gapinc.sustainability.com & SASB, GRI, UNGC Tables, Jul 2019: gapinc.sustainability.com] • Met: Company reports on SASB: The Company discloses in its website its SASB table. [SASB, GRI, UNGC Tables, Jul 2019: gapinc.sustainability.com]
F.3	Key, High Quality Disclosures	0 out of 4	The Gap Inc met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.