

US corporate human rights index:

Tracking changes in company commitments to human rights

Findings as of July 2026

Gap Inc.

Indicator	Finding - 2025	Source	Source link	Yes/no change	Change
Policies and commitments					
<u>General</u>					
Human rights policy - UNGPs	[See below] 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.	Gap Inc. Human Rights Policy	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~/5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Chuman-rights-policy.pdf&hash=835d73d32c5a8c4b50fa0314544973e5e44585c	No Change	
Human rights policy - ILO Core Labor Standards	We are committed to respecting the rights of our employees and workers in our supply chain, in accordance with the International Labor Organization's (ILO) Core Conventions as set out in the Declaration on Fundamental Principles and Rights at Work, including the freedom of	Gap Inc. Human Rights Policy	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~/5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Chuman-rights-policy.pdf&hash=835d73d32c5a8c4b50fa0314544973e5e44585c	No Change	
Forced labor & prison labor	See above [Human Rights Policy] The facility shall not involuntary labour of any kind, including prison labour, debt bondage, slave labour, or forced labour by governments [Code of Vendor Conduct]	Gap Inc. Human Rights Policy Code of Vendor Conduct	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~/5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Chuman-rights-policy.pdf&hash=835d73d32c5a8c4b50fa0314544973e5e44585c https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~/5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Cgap-inc-code-of-vendor-conduct.pdf&hash=ccf11a639f5	No Change	
Human rights defenders & civic space	No evidence			No Change	
Gender equality and women's empowerment	We believe that women's empowerment is essential to advancing human rights protections globally and to achieve the United Nations Sustainable Development Goals. With women representing a large majority of our employees, the workers who make our clothes and our customers, we have a responsibility and an opportunity to empower the women whose lives we touch. To underscore our commitment, we have signed the Women's Empowerment Principles and are implementing them throughout our operations and supply chain. Through our P.A.C.E (personal Advancement & Career Enhancement) program, we work to provide women with the opportunity to gain skills and confidence to advance both at work and in life.	Gap Inc. Human Rights Policy	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~/5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Chuman-rights-policy.pdf&hash=835d73d32c5a8c4b50fa0314544973e5e44585c9d519de970cfcb187e45c6643	No Change	
Indigenous Peoples	No evidence			No Change	
<u>Living wage</u>					
Living wage, own operations	The facility shall pay wages and overtime premiums in compliance with all applicable laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater. The facility is encouraged to provide wages and benefits that are sufficient to cover workers' basic needs and some discretionary income'	Vendor Code of Conduct	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~/5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Cgap-inc-code-of-vendor-conduct.pdf&hash=ccf11a639f5	No Change	

Living wage in supply chain	The facility shall pay wages and overtime premiums in compliance with all applicable laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater. The facility is encouraged to provide wages and benefits that are sufficient to cover workers' basic needs and some discretionary income'.	Vendor Code of Conduct	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~%5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Cgap-inc-code-of-vendor-	No Change	
Human rights due diligence and supply chain					
Process for assessing human rights risks and impacts	<p>Our approach to addressing labor conditions, facilitating greater partnerships with our suppliers and improving sustainability performance begins with assessments and facility audits. These are conducted by Gap Inc., ILO Better Work and the Social & Labor Convergence (SLCP) Program. Our Supplier Sustainability Assessment Manual outlines the protocols these teams use to assess and remediate issues related to labor or working conditions.</p> <p>We conduct three types of assessments: (1) Initial assessment: first full assessment carried out for a facility that has been offered for assessment and approval; (2) Full assessment: covers all sections of Gap Inc. COVC (Code of Vendor Conduct); and (3) Follow-up assessment: assesses progress made by facilities on issues identified during the initial or full assessment. These assessments may also record and report new issues.</p>	Webpage - Assessment and Remediation	https://www.gapinc.com/en-us/impact/policies-and-disclosures/human-rights-and-labor-issues/assessment-and-remediation	Yes	<p><i>We conduct assessments of 100% of our Tier 1 suppliers annually.</i></p> <p>We monitor compliance to the Gap Inc. Code of Vendor Conduct standards through multiple types of assessments. Where available, we align with industry frameworks such as the Social & Labor Convergence Program (SLCP) and ILO-IFC Better Work to reduce duplication and support broader industry consistency. When issues are identified, suppliers are required to implement corrective actions within defined timeframes. Severe issues are addressed immediately, while other corrective actions are expected within set periods, with longer-term prevention plans developed as appropriate. We work with suppliers to support remediation and conduct follow-up assessments to verify progress.</p> <p>https://www.gapinc.com/en-us/impact/policies-and-disclosures/human-rights-and-labor-issues</p>
Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs)	..., Gap Inc. expects all vendors manufacturing our products to cooperate with Gap Inc's. conflict minerals due diligence process. Gap Inc further expects all vendors manufacturing our products to purchase materials from suppliers not involved in funding conflict in the DRC region. Gap Inc. will follow the Organization for Economic Cooperation and Development (OECD) framework to incorporate proper due diligence measures into our supply chain regarding trade in conflict minerals. Given the complexity of our supply chain, we recognise we can successfully put this framework in place only with the cooperation of our vendors. Accordingly, we are working closely with our vendors to determine the potential use of conflict minerals in our supply chain and conveying our expectation that they source such materials from socially responsible suppliers and smelters. Gap Inc. takes its responsibilities under the conflict minerals law very seriously and is working diligently to ensure full compliance.	Gap Inc. Factory Conflict Minerals Policy	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~%5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Cgap-inc-factory-conflict-minerals-policy.pdf&hash=3981b7ebbeb752f95af2776189c995ab517ebe1edd6ef5fda6e290b792b64585#:~:text=CONFLICT%20MINERALS%20POLICY-,GAP%20INC.,Gap%20Inc.	No Change	
Affected stakeholder engagement	We regularly partner with a broad set of stakeholders to better understand the complex issues that affect them, our industry landscape, and society. This dialogue helps us improve our strategies, set goals, focus our action, and scale up industry solutions. We routinely engage with workers in our Tier 1 supply chain through our	2021 ESG Report	https://gapinc-prod.azureedge.net/gapmedia/gapcorporatesite/media/images/values/sustainability/document/s/2021/gap-inc-2021-esg-report.pdf	No Change	
Human rights requirements in supplier code/requirements	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. Gap Inc. recognises 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 Code is based	Code of Vendor Conduct	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~%5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5Cgap-inc-code-of-vendor-	No Change	
Global Framework Agreement	No evidence	Industrial Union	https://www.industrial-union.org/global	No Change	
Access to remedy					

Grievance mechanism for own employees	We also have developed a comprehensive suite of programs that provide myriad workplace benefits and channels where workers can effectively raise grievances. Within each program, workers are given a voice to raise concerns with facility management and outside parties, via various channels: Our Workforce Engagement Program [...] Our Workplace Cooperation Program [...] Our Assessment and Remediation Program [...] Our Code of Business Conduct Hotline..."Our Code of Business Conduct Hotline is available to employees of both Gap Inc. and our suppliers. It provides a secure and confidential, telephone and web-based reporting system- 24 hours a day, seven days a week- and is managed by an independent, third-party vendor.	Webpage - Grievance Mechanisms	https://www.gapinc.com/en-us/impact/policies-and-disclosures/human-rights-and-labor-issues/policies-and-approaches-for-human-rights/grievance-mechanisms	Yes	Gap Inc.'s Confidential Hotline: In addition to factory-level systems, anyone who conducts business with or is affected by Gap Inc. may raise concerns through our confidential, 24/7 Code of Business Conduct (COBC) Hotline, managed by an independent third party. Reports may be made anonymously where permitted by law. We have a zero-tolerance policy for retaliation against workers or other stakeholders for raising concerns. We do not tolerate threats or attacks against human rights defenders. https://www.gapinc.com/en-us/impact/policies-and-disclosures/human-rights-and-labor-issues
Grievance mechanism for workers - supply chain	We require facilities to provide a confidential and anonymous channel for workers to express grievances without fear of retaliation. The grievance process must allow for a timely response, with documentation, and an action plan to address the issue. Our field team trains factory workers and managers on establishing and using grievance mechanisms." "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'	Webpage - Grievance Mechanisms	https://www.gapinc.com/en-us/impact/policies-and-disclosures/human-rights-and-labor-issues/policies-and-approaches-for-human-rights/grievance-mechanisms	Yes	Workers in our supply chain have access to multiple channels and are free to choose a workplace, judicial, or non-judicial mechanism. Additionally, we are responsive to third parties that raise grievances with us via any of our communication channels. Workplace Grievance Channels: Through our COVC, Gap Inc. requires suppliers to maintain effective grievance mechanisms that are accessible to all workers — including foreign migrant workers. These systems must be available in languages workers understand, offer multiple reporting options, and allow for confidentiality and anonymity where appropriate. The grievance system shall include addressing grievances in a timely manner and documenting grievances and management action on grievances. Workplace Committees: The Workplace Cooperation Program strengthens communication and problem-solving between workers and management. Developed with ILO-IFC Better Work, it trains worker-management committees on workplace communication, risk assessment, health and safety, gender dynamics, and core labor standards. Evaluations indicate that participating committees are better able to raise and address workplace issues, helping build trust and improve conditions. Learn more about our Capability-Building Programs.
Grievance mechanism for external individuals & communities	Additionally, we are responsive to third parties that raise grievances with us via any of our communication channels.	Webpage - Grievance Mechanisms	https://www.gapinc.com/en-us/impact/policies-and-disclosures/human-rights-and-labor-issues/policies-and-approaches-for-human-rights/grievance-mechanisms	Yes	In addition to factory-level systems, anyone who conducts business with or is affected by Gap Inc. may raise concerns through our confidential, 24/7 Code of Business Conduct (COBC) Hotline, managed by an independent third party. https://www.gapinc.com/en-us/impact/policies-and-disclosures/human-rights-and-labor-issues

Governance and staffing

Board and/or C-Suite-level oversight	While human rights are the responsibility of all of us at Gap Inc., executive oversight and responsibility for the implementation of this policy rests with our Global Sustainability team led by the Chief Supply Chain and Transformation Officer. The Governance and Sustainability Committee of the Gap Inc. Board of Directors oversees implementation of this policy at the board level. The Committee meets at least four times per year to review and evaluate company programs, policies, and practices relating to social, human rights, and environmental issues and impacts to support the sustainable growth	Gap Inc Human Rights Policy	https://gapinc-prod-a6bndyfubmc5d9ey.z03.azurefd.net/gapmedia/gapcorporatesite/media/images/impact/gap-inc-human-rights-policy-2025-final.pdf	No Change
Senior level responsibility for human rights	The Global Sustainability team, in partnership with the Vendor Compliance team, is responsible for the implementation of the commitments in this policy.	Gap Inc Human Rights Policy	https://gapinc-prod-a6bndyfubmc5d9ey.z03.azurefd.net/gapmedia/gapcorporatesite/media/images/impact/gap-inc-human-rights-	No Change

Reporting and transparency

Human rights reporting (integrated or stand-alone)	Included in 2024 Impact Report	2024 Impact Report	https://gapinc-prod.azureedge.net/gapmedia/gapcorporatesite/media/images/values/sustainability/documents/2021/gap-inc-2021-esg-report.pdf	No Change
Transparency Pledge	Yes	Transparency Pledge	https://transparencypledge.org/aligned/	No Change
Global Apparel Facilities in OAR	915	Open Supply Hub	https://opensupplyhub.org/	
Memberships				
RBA	No	RBA	https://www.responsiblebusiness.org/about/members/	No Change
WEPs (signatory)	Yes	WEPs	https://www.weps.org/companies	No Change
Lobbying and ethics				
Public statement or endorsement in support of mandatory human rights and environmental due diligence	No evidence			
Anti-bribery and anti-corruption policy	Giving bribes, kickbacks or other improper cash payments (or anything else of value) to government officials, civil servants or anyone else to influence decisions and/or services by the government is prohibited and illegal under the U.S. Foreign Corrupt Practices Act (FCPA) and similar international anti-bribery laws. This includes direct or indirect offers or promises of payment. Even if bribery seems to be an accepted local practice in a country, it is against the law and Gap Inc. employees are prohibited to engage in this practice. As a publicly traded company, we must strictly comply with the Company's Anti-Corruption policies and related procedures, such as the Anti-Corruption Due Diligence process, and the FCPA and local anti-bribery laws.	Code of Business Conduct	https://www.gapinc.com/CMSPages/GetAzureFile.aspx?path=~/5Cgapcorporatesite%5Cmedia%5Cimages%5Cvalues%5Csustainability%5Cdocuments%5C2019_cobc_english.pdf&hash=99a770d749c39e1bdfd470f98a3738698d95cda8c7a1f7140068369ee761c014	No Change

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