

Business and Human Rights Resource Center (BHRRC):

Gap Inc. seeks to ensure the people who make our clothes are not subject to any form of exploitative labor practices, including discrimination. We are aware of the complex vulnerabilities faced by migrant workers in Southern India, and have partnered with a broad set of stakeholders to address this issue for several years. Further, we have developed a set of policies that seek to ensure migrant workers' rights are respected, as specified in our Code of Vendor Conduct ([COVC](#)).

The findings in the India Committee of the Netherlands (ICN) report will inform our ongoing effort to help ensure the rights of migrant workers in Southern India are respected, building upon the significant improvements we have seen in the region since the data was collected for the report in August 2016 to December 2016. In the time since the research for this report was conducted, we have actively engaged with and provided a detailed response to the ICN regarding the issues highlighted, and will continue to work with them to build upon the progress thus far.

As we have previously disclosed to ICN, we are implementing a multi-pronged approach to address the issues highlighted in ICN's report. Each aspect of our approach is outlined in more detail below.

**Supplier engagement:**

- At a foundational level, we partner with our suppliers and provide consultative support in their efforts to safeguard workers' rights and improve their well-being. We conduct regular assessments and trainings for our suppliers and assist them in meeting legal and international standards for labor practices and working conditions, and support their efforts to sustainably remediate any issues that are found.
- We partner with our suppliers to review and improve living conditions in hostels. 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.
- 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 hostels. It is worth noting that our engagement with our suppliers has been particularly focused on the development of immediate, short-term action plans, as well as long term action plans, to address the concerns identified by ICN and other expert groups.
- 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. For more information on WPC, please [click here](#).
- Lastly, we are also implementing our P.A.C.E. program in the region. P.A.C.E. seeks to empower female garment workers by providing them with critical professional and life skills trainings. For more information on P.A.C.E., please [click here](#).

**Brand collaboration:**

- We realize that the issues highlighted in the report are sectoral, and that a systemic remedy for them will require partnership and collaboration between all stakeholder groups, including government, industry, civil society, and labor groups. The issues highlighted in the report go beyond one company's influence if we are to address the issue at its root cause. For this reason, we continue to address this issue with other buyers in the region, and have developed aligned communications and approaches, so we are delivering a consistent message to the suppliers based in Bangalore.

**Multi-stakeholder collaboration:**

- We are members of Ethical Trading Initiative (ETI) and have worked with them, other NGOs, and other brands to form collaborative multi-stakeholder forum in Bangalore. While this initiative is a work in progress, we are optimistic that it will begin to deliver meaningful results for workers in South India's garment sector.
- We engage with local unions and civil society organizations to understand their perspective, gather insights, and ultimately create and implement approaches that include their expertise.

We recognize that more work remains to be done on this urgent issue, and that we must continue to focus attention and resources towards remedies, in partnership with other brands, NGOs, unions, and relevant government stakeholders. We appreciate the opportunity to respond to your inquiry, and will continue to provide updates to both BHRRC and ICN as our work in this area continues to grow and evolve.