

# Questions for garment brands re Syrian refugees in Turkey

October 2016

## Company: Gap

**1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? How is this policy communicated to vendors in Turkey?**

Gap Inc. has started to source products from Turkey only in March 2016, after we completed an extensive due diligence process informed by the core principles that guide our business, which are described in such documents as our Human Rights Policy, Code of Business Conduct, Anti-Corruption Policy and Code of Vendor Conduct (COVC). Before any facility can manufacture our products, it must undergo initial assessment about its human and workplace rights and working conditions. Based on this assessment, the factory either earns approval or is placed in a pending status while it addresses outstanding issues.

We have found no presence of Syrian refugees in the assessments in two facilities that we have started to source from in Turkey. Gap is aware of the heightened vulnerabilities faced by migrant and foreign contract workers, and consequently we have developed a set of policies to respect their human rights and safety as part of our COVC. The most relevant policies include those that prohibit forced labor and discrimination of any kind, and a set of policies specifically addressing migrant and foreign contract labor. We expect

all vendors to follow the provisions contained in the COVC and conduct regular trainings on the requirements.

At a high level, these policies require that vendor facilities that recruit or employ foreign contract workers shall ensure that these workers are treated fairly and on an equal basis with its local workers. More specifically, the policy states that: “Migrant workers shall not be subject to any form of forced, compulsory, bonded, or indentured labor. All work must be voluntary and workers must be free to terminate their employment at any time, without penalty. 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, at any time, without penalty.”

Through the policies contained in the COVC, Gap Inc. outlines requirements and safeguards for migrant workers regarding employment contracts and terms, orientation and training, use of recruitment agencies, control of passports, foreign contract worker discrimination, documentation and registration. While the policy does not specifically address Syrian refugees, the scope and intent would apply to them as well, if they work in any of the two facilities in Turkey that we have started to source from.

## **2. How many first tier Turkish vendors does your company have?**

Gap Inc. has recently started to source products from Turkey and has two first tier vendors in the country.

## **3. How many have been audited since in the last year? What percentage of audits have been unannounced?**

As we were exploring re-entry into Turkey, we initiated engagement with two facilities over a year ago and assessed their performance against our Code of Vendor Conduct in late 2015 and early 2016. We began sourcing products from these two facilities in March 2016. The assessments were all announced, per Gap Inc.'s vendor approval process. Subsequent assessments of these facilities may be unannounced.

**4. Does your company carry out audits beyond the first tier? If so what percentage of second & third tier Turkish suppliers have been audited in the last year and what percentage of these audits have been unannounced?**

Gap Inc. does not conduct assessments against our Code of Vendor Conduct of second-tier vendors at this time.

**5. Do the audit & monitoring teams have Arabic-speakers who have received special training tailored to the situation of Syrian refugees, and do they speak with the workers confidentially?**

We have conducted a very limited number of initial assessments in Turkey, as we have only recently started to source products from the country from two facilities. However, we worked with local interpreters whenever deemed necessary to conduct assessments. Vendors in Turkey were required to submit a facility profile prior to the assessment, and this included demographic information about the workforce. If a facility employs foreign contract workers, they are required to submit relevant details, nationalities, and identification numbers. Based on the facility profiles received (and the lack of foreign contract workers employed), as well as our on-site assessments and verifications, it was not deemed necessary to work with Arabic-speakers for these assessments. Our

assessment team (and interpreters) do speak with workers confidentially in their local language, and to verify during these conversations that there are no foreign workers employed.

**6. How does your company address the possibility of undeclared subcontracting in its supply chain?**

Generally speaking, for every country from which we source, we have a rigorous process to check for unauthorized subcontracting during on-site assessments, and quality checks. We inform vendors about our subcontracting policy so that they are aware of our expectations, and the consequences of violating our policy. If unauthorized subcontracting is found, we conduct an analysis to determine the root cause—the results of which are used to determine the appropriate remediation plan and penalty.

**7. Has your company identified supplier factories employing Syrian refugees in the last year? If the answer is yes please state how many factories, if possible**

We have not identified any facilities employing Syrian refugees in the initial assessments completed so far. We checked for this through management disclosure at the beginning of the assessment, visual check during facility tour, and through confidential individual/group worker interviews.

**8. Has your company identified supplier factories employing Syrian child refugees in the last year? If the answer is yes please state how many factories, if possible**

No, we have not identified any facilities employing Syrian child refugees in the initial assessments completed so far. We checked for this through management disclosure at

the beginning of the assessment, visual check during facility tour, and through confidential individual / group worker interviews.

**9. When Syrian refugees are identified at a supply factory, what process does your company expect the supplier to follow? In particular please state whether they remain in employment.**

If Syrian refugees were identified at a vendor facility, the vendor would be responsible for ensuring that the foreign contract workers enjoy the same rights and protections as domestic workers. This includes taking measures to enable them to work legally (i.e. provide support to obtain necessary work permits).

**10. Does your company have a remediation plan that addresses instances of discrimination/abuse against Syrian refugees in its supply chain? If yes please provide details of the plan, how it is communicated to refugees, and examples of outcomes if available.**

We have remediation plans that address instances of discrimination/abuse against foreign contract workers, which would cover and be adapted for any Syrian refugees found.

**11. Does your company work with any local NGOs or trade unions to provide remediation services to refugees?**

We have only recently started to source products from Turkey, and have not yet encountered situations requiring remediation. However, we do plan to work with local NGOs, trade unions and other stakeholders to understand and provide remediation services to refugees, as and when required.

**12. As Syrian refugees cannot receive social security benefits at this time, is your company taking steps to ameliorate the impact of this?**

In our assessments in facilities in Turkey, we have not found any Syrian refugees in the facilities that underwent these assessments. However, we look forward to learning about best practices regarding the role apparel brands and retailers can take in ameliorating this issue.

**13. Has your company undertaken any specific training with its first tier suppliers on this issue?**

As we have very recently started sourcing from Turkey and have found no presence of Syrian refugees in both the facilities, we have not yet undertaken any training with vendors on this issue. However, consistent with our approach in other sourcing countries, we will soon utilize our internal capability building resources to provide relevant trainings to both the vendors.

**14. What steps has your company taken to ensure that your policies/approach are being implemented by suppliers beyond the first tier?**

Generally speaking, for any country in which we source, as part of our Code of Vendor Conduct (COVC), vendors are responsible for ensuring that their vendors also meet our COVC requirements. We have focused on these aspects in our initial assessments and in our meetings with officials from vendors in Turkey. We continue to monitor the situation on both facilities and communicate our expectations around COVC regularly. We also plan to include these and related issues in the trainings that we provide to these facilities in near future.

**15. Does your company engage with local civil society groups and trade unions on this issue, for instance, in negotiating a policy position & carrying out risk mapping?**

*[Gap provided a general statement on stakeholder engagement in relation to questions 15-18]*

As we have only recently started to source products from Turkey, and have found no presence of Syrian refugees in the two approved facilities from which we source. We have yet to discuss this issue with our network of stakeholders, but are interested and open to discussing opportunities to collaborate with others in ensuring the rights of Syrian refugees are respected in Turkey.

**16. Does your company work with trade unions on identifying health & safety risks for Syrian refugees (where communication may be difficult)?**

*[Gap provided a general statement on stakeholder engagement in relation to questions 15-18]*

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**17. Does your company work with trade unions or other partners to offer training and education programmes for refugees?**

*[Gap provided a general statement on stakeholder engagement in relation to questions 15-18]*

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**18. Has your company engaged the Turkish Government regarding the legal framework for Syrian refugees?**

*[Gap provided a general statement on stakeholder engagement in relation to questions 15-18]*

As we have only recently started to source products from Turkey, and have found no presence of Syrian refugees in the two approved facilities from which we source. We have yet to discuss this issue with our network of stakeholders, but are interested and open to discussing opportunities to collaborate with others in ensuring the rights of Syrian refugees are respected in Turkey.

**19. Please provide any further information regarding your company's activities on this issue which you think are relevant.**

Beyond Turkey, we are exploring other shorter- and longer-term opportunities for Gap Inc. to support the Syrian refugee population. We partnered with CARE to expand our [Gap Inc. P.A.C.E.](#) program to a community-setting in Jordan with the goal of helping Syrian refugees. This included adapting the core curriculum and translating it into Arabic. The

P.A.C.E. program offers an opportunity for both education and social connection and engagement in refugee environments which are lacking in intellectual, vocational or social outlets.

We are also examining our presence in current and projected destination countries, and exploring opportunities to work with vendors, franchise partners, NGO partners, and This Way Ahead partners (our youth employment program, which includes participation by immigrants and refugees) to support humanitarian and job placement efforts for Syrian refugees. We have donated GapKids coats and jackets to Save the Children to be distributed to refugee children in Europe. We have also encouraged our employees to offer support by making a financial donation to one of the non-profit organizations working directly with the refugees, with a commitment by Gap Foundation to match donations of \$25 or more.