

February 03, 2016

**Mr. Gerard Oonk**  
**Director**  
**India Committee of the Netherlands**

**Dear Mr. Oonk,**

We write to you with regard to the recently released *Unfree and Unfair* Report by the India Committee of the Netherlands (ICN), which highlights key concerns for migrant workers in Bengaluru. We appreciate the report and believe that it raises valid and critical issues that need to be addressed.

As we explained to you over phone, we wanted to clarify that prior to the release of the report we did not receive any communication from the ICN regarding the report draft. Hence, it seems that there has been some miscommunication that Gap Inc. was mentioned in the report as not having responded or having taken any serious action on the issues highlighted. As we explained, we have taken the report findings seriously and making all efforts to address the issues highlighted.

Apart from our efforts with individual vendors, we are working closely with ETI and other brands to contribute to an industry-wide multi-stakeholder approach to effectively address these issues to be able to find long-term sustainable solutions. To briefly update you, we have taken up following three-pronged approach to address the issues:

**1. Engagement with Vendors:**

- We had received draft report from ETI, which we immediately shared with all our vendors and started to work with them to focus on the issues highlighted.
- Gap Inc. is one of the key brands to have contributed to the development of "*Guidance for Migrant Women Workers in Hostels & Recruitment Process*" in Tirupur through a local multi-stakeholder forum – Tirupur Stakeholders' Forum (TSF). These guidelines provide a good reference for vendors to make changes in living conditions in housing facilities and also in the Human Resource practices adopted by them. We have also shared TSF guidelines with our vendors and working with them on the housing-related issues as a priority.
- We are ensuring that guidelines provided in TSF are implemented by our vendors in Bengaluru. We are also working towards a larger multi-stakeholder approach, in collaboration with local stakeholders, to adapt these guidelines to Bengaluru-context for larger impact.

**2. Collaboration with other Brands:**

- Following initial communication that ICN had with some of the brands, this issue was discussed in the *Brand Ethics Working Group* (BEWG) meeting in India in late-November 2015. The BEWG decided that each brand will communicate with their respective vendors in Bengaluru about the issue, sharing the TSF guidelines to educate them and also to implement these. The idea was to have an aligned communication between brands and their suppliers and to give same message to vendors, rather than having different communication.
- Since then, we have organized individual follow up meetings with our vendors and also participated in joint "brands–vendor" one-to-one meetings to ensure progress in communication and guidelines implementation.

### 3. Industry-wide Collaboration:

- We are working actively with ETI and other Brands to contribute to the formation of a collaborative multi stakeholder forum comprising of Industry, Brands, local Unions and other Civil Society Organizations to address this issue in Bengaluru. This multi-stakeholder forum will look at various solutions available to address these issues at the industry level and how a joint effort could be made for sustainable solutions and larger impact.
- We are also in touch with local unions and civil society organizations, and are keen that they be part of the industry-wide multi-stakeholder forum, so that we all understand the issues better and make joint efforts to address them.

Gap Inc. is committed to safeguarding the rights of the people who work in the factories where our products are made. We have very strict standards outlined in our Code of Vendor Conduct (COVC) and make sure that we only work with vendors who are able and willing to follow the same. We monitor factories against the consistent standards of our COVC and rate their performance over time so that we can more effectively address issues. The value of monitoring extends far beyond uncovering problems; it includes all of the actions we take to facilitate remediation in a sustainable way.

Over the years, we've increased our understanding of the issues faced by workers in the apparel industry. However, we don't always have the ability to solve these multi-faceted problems alone. In most cases, long-term solutions call for collaboration. Hence, we partner with stakeholders such as labor rights groups, trade unions, factory owners and management, governments, non-governmental organizations and other companies to make progress.

We shall continue to monitor and remind the factories of our expectations that they do their utmost to ensure workers' rights. We shall further evaluate and strengthen practices to ensure workers' freedom of association and movement, as per law and our COVC. We also look forward to engaging with all relevant stakeholders to understand the issues better and to ensure that the workers' rights are protected.

We would also appreciate if you could kindly rectify the para in the *Unfree and Unfair* report that claims that Gap Inc. has not responded to ICN's draft report, and seems to have happened due to some miscommunication.

Sincerely,

Gap Inc.