



Athleta Inc.

Disclosure Report

Date Submitted: December 16th, 2025



Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- 1) Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

B Lab's Public Complaints Process

Any party may submit a complaint about a current B Corp through [B Lab's Public Complaint Process](#). Grounds for complaint include:

- 1) Intentional misrepresentation of practices, policies, and/or claimed outcomes during the company's [certification process](#)
- 2) Breaches of the B Corp Community's core values as expressed in our [Declaration of Interdependence](#)

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company.



Disclosure Questionnaire

Industries and Products

	Yes	No
Please indicate if the company is involved in production or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services	☐	☒
Biodiversity Impacts	☐	☒
Chemicals	☐	☒
Disclosure Alcohol	☐	☒
Disclosure Firearms Weapons	☐	☒
Disclosure Mining	☐	☒
Disclosure Pornography	☐	☒
Disclosure Tobacco	☐	☒
Energy and Emissions Intensive Industries	☐	☒
Fossil fuels Gambling	☐	☒
Genetically Modified Organisms	☐	☒
Illegal Products or Subject to Phase Out	☐	☒
Industries at Risk of Human Rights Violations	☐	☒
Monoculture Agriculture	☐	☒
Nuclear Power or Hazardous Materials	☐	☒
Payday, Short Term, or High Interest Lending	☐	☒
Water Intensive Industries	☐	☒
Tax Advisory Services	☐	☒

Outcomes & Penalties

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior	☐	☒
Breaches of Confidential Information	☐	☒
Bribery, Fraud, or Corruption	☐	☒
Company has filed for bankruptcy	☐	☒
Consumer Protection	☐	☒
Financial Reporting, Taxes, Investments, or Loans	☐	☒
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	☐	☒
Labor Issues	☐	☒
Large Scale Land Conversion, Acquisition, or Relocation	☐	☒
Litigation or Arbitration	☒	☐
On-Site Fatality	☐	☒
Penalties Assessed For Environmental Issues	☐	☒
Political Contributions or International Affairs	☐	☒
Recalls	☐	☒
Significant Layoffs	☐	☒
Violation of Indigenous Peoples Rights	☐	☒
Other	☐	☒



Practices

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing	☐	☒
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	☐	☒
Company prohibits freedom of association/collective bargaining	☐	☒
Company workers are prisoners	☐	☒
Conduct Business in Conflict Zones	☐	☒
Confirmation of Right to Work	☐	☒
Does not transparently report corporate financials to government	☐	☒
Employs Individuals on Zero-Hour Contracts	☐	☒
Facilities located in sensitive ecosystems	☐	☒
ID Cards Withheld or Penalties for Resignation	☐	☒
No formal Registration Under Domestic Regulations	☐	☒
No signed employment contracts for all workers	☐	☒
Overtime For Hourly Workers Is Compulsory	☐	☒
Payslips not provided to show wage calculation and deductions	☐	☒

	Yes	No
Sale of Data	☐	☒
Tax Reduction Through Corporate Shells	☐	☒
Workers cannot leave site during non-working hours	☐	☒
Workers not Provided Clean Drinking Water or Toilets	☐	☒
Workers paid below minimum wage	☐	☒
Workers Under Bond	☐	☒
Other	☒	☐

Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones	☐	☒
Child or Forced Labor	☐	☒
Negative Environmental Impact	☐	☒
Negative Social Impact	☒	☐
Other	☐	☒



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other Disclosures

Topic	Negative PR
Summary of Issue	As part of its diligence process, B Lab Global found online articles that have reported alleged high BPA levels in activewear of several companies, including Athleta. Gap Inc. is contesting these findings.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	At this time, there are no financial implications related to these allegations.
Impact on Stakeholders	The allegations reported in the articles that B Lab Global found have the potential of having environmental non-compliances in products that may pose health risks to consumers. The main stakeholders of these articles are consumers of the potentially affected activewear industry.
Implemented Management Practices	Effective chemical management in Gap Inc.'s product manufacturing is crucial to protecting the health of the company's customers, suppliers, employees, and the environment. Despite stringent controls, products may contain traces of unintentional chemicals from external factors like environmental contamination and recycled materials. Gap Inc. requires supplier compliance with the company's COVC and Mill Compliance Agreement and expects suppliers to adhere to industry guidelines, including the Apparel and Footwear International RSL Management (AFIRM) Group Restricted Substances List, the Zero Discharge of Hazardous Chemicals (ZDHC) Manufacturing Restricted Substances List (MRSL), and the ZDHC Wastewater Guidelines. Gap Inc. assesses supplier performance through vendor compliance audits, Higg FEM, and works with suppliers to address nonconformances.
Report	Study finds high levels of toxic chemicals in clothing from such brands as Nike, PINK
Management Comments	https://www.gapinc.com/en-us/impact/bridging-the-climate-gap/chemicals-management
Related Incidents (Yes/No)	No



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Supply Chain Disclosure

Topic	Suppliers Negative Social Impact
Summary of Issue	Adherence to the Gap Inc. Code of Vendor Conduct (COVC) is required of all factories that produce goods for Gap Inc., of which Athleta is a subsidiary. The Gap Inc. COVC mandates compliance with the company's Human Rights Policy and annual completion of the Higg FEM. It is grounded in the Universal Declaration of Human Rights, UN Global Compact, OECD Guidelines for Multinational Enterprises, and ILO Core Conventions. If violations are identified, Gap Inc. conducts investigations, due diligence, and root cause analyses with all relevant parties. Corrective actions must be implemented within 60 days; long-term prevention plans within 120 days. Closure requires full alignment with COVC and Human Rights Policy standards. Ongoing or severe noncompliance may lead to vendor termination. During deactivation, Gap Inc. monitors the factory to ensure the resolution of outstanding issues. Gap Inc. is not included in the scope of Athleta's B Corp certification.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	B Lab reviewed the scope of the issue. The scope does not affect the company's certification.
Impact on Stakeholders	Gap Inc. has a responsibility to respect the human rights of the people who make its clothes. Through the Vendor Compliance program, the company seeks to ensure that they work in safe, healthy, and fair conditions and that they are treated with dignity and respect.
Implemented Management Practices	Gap Inc. incentivizes suppliers to implement proper labor, health, and safety, and environmental standards in their facilities by incorporating the company's supplier assessment ratings into the vendor scorecard. The Sourcing team uses scorecards to assess supplier performance, identify improvement areas, and foster accountability through regular reviews. Gap Inc. participates in Better Buying, an initiative that promotes responsible labor practices and the protection of human rights in the supply chain, reflecting the company's ongoing efforts to promote



	supply chain transparency and fair labor practices. Gap Inc.'s Workforce Engagement Program enables workers to confidentially report grievances to facility management, improving worker-management relationships and driving facility improvements.
Report	Assessment and Remediation Gap Inc. Human Rights and Labor Issues Capability Building Programs Although Athleta is included in Gap Inc. reporting, Gap Inc. is not in the scope of Athleta's certification
Related Incidents (Yes/No)	No



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Litigation, Arbitration, Penalties, and/or Regulatory

Athleta, Inc. reported having two litigations filed, that B Lab considered relevant for transparency for certification, against the company related to the following issues: COVID-related rent disputes. Those cases have been resolved in the last five years.