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1.0 Your Status

You have received a copy of this Third Party Worker Handbook (the “Handbook”) because you are either an independent contractor or an employee or agent of an independent contractor, vendor, or temporary agency. If you are an independent contractor, USAA has contracted with you directly to perform a particular project. If you are an employee or agent of an independent contractor, vendor, or temporary agency, you have been assigned by your employer to perform work at USAA. Familiarize yourself with this Handbook.

Third Party Workers (“TPW”) receive no salary, bonus, group health or life insurance, accrual of credited service for retirement, paid time-off, or any other employee benefits from USAA, and are not eligible to participate in any USAA employee welfare, pension, or benefit plans or programs. While on assignment at USAA, you shall conduct your operations consistent with USAA’s policies and Code of Business Ethics and Conduct (the “Code”) in all dealings with USAA’s members, employees and other business relationships.

USAA does not intend to create a joint employer relationship with you or your organization. As a TPW, you are employed solely by the organization that assigned you to perform services at USAA. Your organization possesses the sole and exclusive right to interview for different positions, discipline and make all employment related decisions regarding your employment.

2.0 Diversity, Inclusion, Equal Employment Opportunity, & Harassment Prevention Policy

USAA is committed to fostering and preserving a culture of diversity and inclusion (D&I). The collective sum of individual differences, life experiences, knowledge, backgrounds, unique capabilities and skills represent a significant part of our culture, reputation, and ability to accomplish our mission. At USAA, we embrace and encourage differences which make our culture unique.

USAA has a longstanding commitment to equal employment opportunity. Our commitment includes fostering a work environment of inclusion and respect for others that is free from discrimination, harassment, and inappropriate conduct regarding an individual’s protected characteristics.

All practices and decisions are based on merit, qualifications, and abilities related to business needs. We do not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability, genetic information, sexual orientation, gender identity or expression, pregnancy, veteran status, or any other legally protected characteristic. We are also dedicated to affirmatively providing opportunities to females, minorities, disabled individuals, and protected veterans consistent with applicable laws.

We prohibit sexual and other forms of harassment, including jokes, bullying, inappropriate gestures, threats, offensive visual or electronic displays, slurs, name-calling, stereotyping, comments that show a hostility or aversion to a protected group or other inappropriate comments or actions. Non-USAA workers, vendors, members, and anyone else conducting business with USAA are also prohibited from engaging in such behavior. We will take all necessary actions to ensure that USAA continues to be a respectful, professional and a harassment-free workplace, up to and including removal from assignment.
If you believe that you are being discriminated against, harassed or subjected to inappropriate conduct or if you believe you have observed such conduct directed at other individuals, you are expected to immediately report it to your employer, to a USAA Sponsoring Manager or the USAA Ethics Helpline (see Reporting section).

USAA will not tolerate any form of retaliation against any individual who expresses a concern about alleged discrimination, harassment, and/or retaliation.

A request for reasonable accommodations for the known physical or mental limitations of qualified individuals with disabilities, and for TPWs whose work requirements interfere with their sincerely held religious beliefs, must be submitted through your employer.

### 3. Code of Business Ethics & Conduct – Conflicts of Interest

TPWs on assignment at USAA are required to comply with the USAA Code of Business Ethics and Conduct and the [Supplier Code of Conduct](#). You can access these documents once on assignment at USAA through the Ethics website: go/ethics.

As discussed in more detail in the Codes, you are required to:

- Comply with all federal, state, local and international laws and regulations that governs USAA activities.
- Conduct yourself in a manner that avoids all conflicts of interest with employees, members, suppliers, and other companies – real or perceived. A conflict exists when personal interests influence or appear to influence, your ability to act in the best interests of USAA and its members.
- Avoid engaging in any activity or conduct that would harm USAA, its members, or employees or that distracts you or others from serving the needs of USAA’s members or the association.
- Protect USAA’s confidential and proprietary information and intellectual property you access or review during your assignment at USAA and honor the same of other companies.
- Protect USAA’s resources and secure permission from the appropriate USAA authority before taking, borrowing, or lending USAA property or information.
- Make truthful and accurate entries in company reports and records.
- Do not represent or give the appearance of representing USAA in external activities unless you have permission from the appropriate USAA authority to do so.
- Do not take advantage of your assignment at USAA, USAA resources, or USAA information for personal gain. This includes not engaging in insider trading if you have access to non-public information from public companies with which we do business.

### 4.0 Reporting

In the context of your business relationship with USAA, direct questions and/or report misconduct involving conflicts of interest, the offer or acceptance of gifts, favors, entertainment and other forms of misconduct, no contractual consideration, or suspected fraud internal to USAA’s Ethics Helpline online at [www.usaaethicsmatters.ethicspoint.com](http://www.usaaethicsmatters.ethicspoint.com) or calling:

- Toll free - U.S.: 1-855-208-8583
- United Kingdom:
  - (C&W) 0-500-89-0011, then 855-208-8583
  - (British Telecom) 0-800-89-0011, then 855-208-8583
- Canada: 1-855-208-8583
- India: 000-117, then 855-208-8583
- Mexico: 855-243-2531
5.0 Employment Solicitation

Soliciting employment from USAA other than through USAA’s standard application processes while on an assignment with USAA is prohibited. If you have an interest in employment with USAA, learn about available positions and join the Talent Network through www.usaajob.com.

A TPW should not offer third party services or resources directly to USAA Management. All offers for third party services or resources should be sent directly to the Third Party CoE at 3rdpartycoe@usaa.com.

TPW is prohibited from soliciting contract work for personal gain from USAA while under contract with a Supplier.

6.0 Protecting USAA Information

USAA is committed to protecting information to maintain the trust of our members and employees and to ensure the continuation of USAA as a competitive, financial services company. You are responsible for safeguarding USAA Information and any confidential information of third parties you access or review while on assignment at USAA. USAA Information includes, but is not limited to, information concerning customers, members, employees, business trade secrets, USAA legal actions, USAA Business Partners, third party suppliers, training, and any other data that is not classified as Public Information.

You are responsible for properly labeling electronic and paper documents and communications and for the proper storage, sharing, and disposal of such USAA Information in accordance with USAA Classification Guidelines. For more information, contact your USAA Sponsoring Manager.

You are expected to have both authorization and a direct business requirement to access USAA Information, including member, employee, and business data. If you are a member or have Powers of Attorney for family members or others, you may access account information for yourself and those individuals only as a member would.

You are expected to share USAA Information only with proper authorization and a business need.

Upon conclusion of your assignment to USAA, you must return all USAA Information, including reports, documents, papers, memoranda, disks, and any other data in your possession or under your control that you received them or had access to them through your assignment to USAA. This includes originals, drafts and notes containing or related to USAA Information.

You are prohibited from using devices used to capture any USAA Information, which includes photographs, images, video, audio, keystrokes, or electronic data that contain USAA Information unless you have a valid business purpose. If you believe you have a valid purpose, please discuss with your employer and USAA Sponsoring Manager. While in work area or certain Controlled
Areas, the use of some recording devices may be limited due to the inability to determine whether the device is actively recording.

You are responsible for reporting any suspected or actual unauthorized access or disclosure of USAA Information and/or systems.

### 7.0 Training

USAA expects TPWs to possess the skills necessary to provide the contracted services before starting the assignment. If training is required for your USAA assignment, then your USAA Sponsoring Manager will notify your employer.

### 8.0 Third Party Access to USAA Property

**8.1 Privileges:** TPW’s while on assignment may use USAA’s cafeterias, break room areas and market places.

**8.2 Recreation Facilities:** TPWs may not use Fitness Centers or recreation facilities or sign-up for company-sponsored athletic teams or intramural programs.

**8.3 USAA Employee Meetings and USAA Recognition Events:** TPWs may not participate in USAA’s employee events, (includes but not limited to Town Halls, Employee Meetings, Recognition Events or Team-Building Events).

**8.4 Business Related Travel:** Travel at USAA’s expense (e.g., direct bill or via travel reimbursement vouchers) is not permitted without prior approval of your USAA Sponsoring Manager, and as permitted under the agreement with your employer; however, payment as part of the fee for contract services is allowed.

### Third Party Workers with Physical Access to USAA Property

#### 9.0 Alcohol, Tobacco & DrugFree Workplace

USAA is committed to maintaining a safe and healthy workplace that is drug and alcohol-free.

Do not consume alcohol, unlawfully manufacture, distribute, dispense, sell, possess, store, or use controlled substances, misuse prescription drugs or inhalants, use any illegal drugs, or engage in other prohibited activities while performing services on behalf of your employer for USAA while on USAA-owned or leased property, or when operating a USAA-owned, leased, or rented vehicle.

If you have problems with alcohol, controlled substances or illegal drugs, consult your employer to see whether it has an Employee Assistance Program (EAP). EAP participation does not exempt you from complying with this policy.

If your conduct results in any criminal proceedings, including criminal charges, indictment, and/or conviction under any drug statute or for driving under the influence or driving while intoxicated, you are responsible for reporting this to your employer, as soon as possible, but no later than five calendar days from the incident. You are also responsible for informing your employer of any developments in the proceedings.
10.0 Attendance

Report unplanned and sudden absences and tardiness to your employer. Your employer will notify the USAA Sponsoring Manager.

11.0 Safe Driver and Campus Access Policy

Anyone driving a vehicle on USAA business is expected to be courteous, drive safely, observe all traffic laws, including posted speed limits, traffic signs and signals, follow directions given by uniformed security officers, wear seatbelts, and avoid using handheld electronic communication devices while the vehicle is in motion.

To access our campuses, TPWs and vendors will be asked to present their identification badge. Visitors will be asked to present a valid driver's license or government-issued identification card, and must be in the Visitor Registration system and escorted by a USAA employee while on campus. USAA always reserves the right to deny access to our campuses, as well as any other USAA owned or leased property.

TPWs who operate and park a vehicle on campus are responsible for possessing proof of insurance and displaying a USAA decal on their vehicle. While driving on campus, TPWs and visitors are expected to abide by the safe driver expectations outlined above. Minor on-campus traffic violations will result in the issuance of a citation. Repeated or more serious violations will be escalated to your employer.

11.1 Vehicle Registration:

All vehicles utilizing USAA campus parking garages are required to register their personal vehicle(s). To register your vehicle online go to: [Vehicle Registration](#). You can also visit the Physical Security Office in your location.

TPWs will place their required hang-tuff on the rear view mirror. Hang-tuff must remain visible on the rear view mirror while vehicle is on USAA property.

You are required to provide the following information, upon registration:

- Year
- Make
- Model
- Color
- License plate #

11.2 Citation Information:

Failure to comply with USAA driving and parking rules may result in a citation.

Citation Escalation

- 1st offense: warning
- 2nd offense: email to Supplier
- 3rd offense: email to USAA Sponsoring Manager and Supplier
- 4th offense: Driving/Parking privileges will be revoked
Displayed unprofessional behavior towards Security Officer will result in immediate removal and termination of your assignment with USAA.

12.0 Parking

All TPWs are required to park in designated areas only. Vehicles parked on USAA facilities must park between the button/striped parking spaces that are provided.

A parking permit will be issued to you on the first day of your assignment and must be displayed on your rearview mirror at all times. Your permit will expire on the last day of your assignment and must be returned to your USAA Sponsoring Manager Enterprise Security, or Human Resources. Non-adherence to our parking policy could result in fines and or removal of your driving privileges on USAA campuses.

TPWs are permitted to park in the following locations:

- Visitor’s parking (the first day of assignment only)
- San Antonio Home Office
  - North Parking Garage
  - South Parking Garage
  - Bank Services Building Garage – Roof Top Only
  - Any Open surface Parking sites
- Regional Offices
  - Any area designated by Security
- After Hours and Weekend Parking – TPWs can park in any of the parking garages during the following timelines.
  - Monday – Friday, between 6:00 pm to 6:00 am
  - Saturday – Sunday, all day

12.1 Van Pool: The USAA Van Pool is not available to TPWs.

13.0 Workplace Violence Prevention

USAA is committed to providing a safe, secure, and professional work environment for employees, visitors, vendors, and TPWs. Everyone is expected to maintain a cooperative and professional demeanor while on USAA campuses and while conducting USAA business. We will not tolerate violence, threats, or other disruptive conduct. You are expected to immediately report such conduct to your employer and also your USAA Sponsoring Manager or Enterprise Security.

The possession of firearms and other weapons on USAA owned or leased property, including fleet vehicles and catastrophe offices, is strictly prohibited, unless permitted by state law. In states where it is legal to transport and store firearms in locked, privately-owned motor vehicles, the firearm should not be handled and/or brandished in any manner on USAA owned or leased property. Under no circumstances will a firearm or weapon be permitted inside any USAA building. This prohibition applies to everyone, including individuals who possess a concealed handgun license.

You are responsible for being constantly alert to workplace conduct that is violent, threatening, harassing, intimidating, disruptive, or in other ways inappropriate. This includes any activity occurring off USAA property that could later be brought back to the workplace or result in creating
an unsafe environment for employees and other individuals on USAA property. You are also expected to fully cooperate in any investigation of an allegation of workplace violence. We reserve the right to bring any act or threat of violence to the attention of local law enforcement officials. USAA’s obligation to provide a safe, secure working environment cannot be effectively accomplished unless the company is informed about individuals who have been ordered by the courts, or other legally constituted entities, to remain away from an employee. If you obtain or are the subject of a protective or restraining order, you are expected to provide copies of the order to your employer, Corporate Security Investigations and Physical Security.

We reserve the right to conduct searches or inspections of individuals and their personal property while on USAA campuses. USAA property, including vehicles, equipment, and systems, are also subject to search or inspection. There is no expectation of privacy in your use of USAA systems or other property, even if private passwords, access codes, locks, or other security measures are used.

You are expected to wear your identification badge in a visible manner at all times while on USAA campuses. It is also your responsibility to safeguard your badge and to immediately report its loss to Physical Security. You are responsible for the proper registration and accompaniment of visitors on campus.

You are responsible for reporting any criminal proceedings, including criminal charges, indictment, and conviction or developments related to the incident to your employer per their reporting policies.

13.1 Injury: All on-the-job injuries to TPW, no matter how minor, should be reported promptly to your employer. If you experience an injury, you should:

- Notify the manager or the supervisor on duty in the work area.
- Go to the nearest USAA Health Clinic to report the accident or injury if it is during normal business hours.
- Contact Building Security at 8-HELP if the Health Clinic is closed or if the injury occurs after normal business hours.

If you need emergency medical care, call 911. Afterwards, call or have someone call Security and inform Security that emergency services have been called and your location. Security will direct emergency services to the site.

14.0 Miscellaneous

14.1 Company Store: TPWs are permitted to shop in the Company Stores, but must pay in cash or by credit card. Check cashing is not permitted.

14.2 Infectious Disease Prevention: TPWs will ensure that they are free of flu and infectious disease symptoms while at work. TPWs displaying symptoms of flu or other infectious diseases will be asked to go home, see their doctor and remain home until symptoms have abated.

14.3 Use of Copiers and Printers: TPWs may not copy personal papers on company copiers nor print personal files on company printers.
15.0 Personal Phone Calls - Use of Personal Devices

15.1 Personal Phone Calls: Like all of USAA’s company resources, USAA’s computers, telephones and fax machines are tools intended to support USAA’s business. As an Association, USAA members pay for these resources so that USAA can provide the level of service members expect. USAA’s telephones may be used for limited personal use when approved in advance by the USAA Sponsoring Manager. Any use of USAA’s resources is subject to monitoring and you should not have an expectation of privacy, even when using the telephones for personal use.

USAA’s computer, telephone lines or fax machines may not be used to make personal long-distance calls paid for by the company or to receive incoming personal calls on USAA’s toll-free numbers.

15.2 Use of Personal Devices: TPWs are expected to engage in productive work for the benefit of USAA, including use of Internet and other forms of electronic communication. Use of your personal devices should be limited so it does not interfere with work productivity or USAA business. If you need to use your personal device, step away from your work area to do so. You are responsible for using good judgment and common sense when using your personal devices, including frequency, timing and duration.

16.0 Safety

USAA strives to provide the safest work environment for its employees, TPWs, and guests. As part of USAA’s commitment to keeping you safe, we provide security patrols, lighted campuses, gated entrances at some locations, and secured building access.

To ensure building occupant safety during a life safety incident, USAA encourages all employees and TPWs to follow emergency evacuation procedures. During an event you will hear a fire alarm, TPWs should stop, follow the instructions provided by the Fire PA system, “find and follow a red hat to safety,” and report to the nearest assembly point, which is denoted by the red assembly signs. A “Red Hat” is a person designated as part of the evacuation team and will assist with the evacuation process. Fire exit route maps can be found throughout all buildings. It is a good idea to always know two exit routes from the area where the TPW is working. TPWs are responsible for educating their employees as to the applicable fire exit routes and evacuating according to USAA evacuation procedures.

17.0 Workplace Solicitation

Solicitation in any form is not allowed in work areas during working time. This includes solicitation for subscriptions, memberships or other purposes. Printed material, including but not limited to fliers, advertisements, literature, catalogs, brochures or other information may not be distributed unless they are published for official USAA business. Distributing such material is not permitted at any time on USAA’s owned or leased property by any person. If USAA observes this occurring, USAA will report this conduct and behavior to the TPW’s employer.

Gambling and the solicitation to gamble in any form (e.g. lottery pools or prizes, baseball or football pools, weight loss pools, etc.) are not permitted while on USAA premises or via the use of any USAA resources, e.g. computers, telephones, duplicating equipment, facsimile machines.
18.0 Physical Security

18.1 Definitions:

- **Weapons** include firearms, knives (other than pocket knives), martial arts weapons, commercial or handmade explosives or any object designed, intended or used to inflict bodily harm to another person or property.

- **Criminal proceedings** include criminal charges, indictment, and/or conviction or sentencing under any criminal statute, including any developments in the proceedings.

- **Conviction** includes a plea (including a plea of no contest or nolo contendere), verdict, or finding of guilt (including pretrial or post-trial diversion or deferred adjudication) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of federal or state criminal statutes.

18.2 Third Party Worker Badges: USAA provides red ID cards for TPWs.

Your ID card is valid only for the duration of the assignment. ID cards are the property of USAA, and may only be used in association with your assignment at USAA.

Your ID card must be worn, facing outward, in plain view, at all times while on USAA premises. Access onto the campus will not be granted without your ID card. If you forget your ID card you have the option of returning home to retrieve your ID card or you may obtain a temporary ID card from the Security Administration office. Security will record each time you fail to produce your ID card to enter or exit the building and will notify the USAA Sponsoring Manager responsible for your assignment if you repeatedly fail to produce the card, which may affect your assignment. You should immediately notify the USAA Sponsoring Manager, and Security if your ID card is lost, stolen, or misplaced. A fee of $100.00 plus tax will be charged for replacement ID cards. If your ID card is damaged and needs to be replaced, there will be a $10 fee plus tax.

Use only the ID card assigned to you. The use of another individual’s ID card, or allowing another individual to use the ID card assigned to you is prohibited. Once you have completed your assignment, you must return your ID card and parking permit to the USAA sponsoring manager responsible for your assignment or to the TPW COE. The USAA Sponsoring Manager will ensure your ID card and parking permit are returned to USAA Security. Should you fail to return your ID card to your USAA Sponsoring Manager or the TPW COE, immediately return it to your employer. Your employer will make arrangements to return the ID card to USAA.

18.3 Escort Privileges: Escort privileges will be granted only if a TPW has a valid business requirement to escort visitors, and only if the visitor will provide operational support to an existing contract.

Escort requests can only be submitted by a USAA Sponsoring Manager.

TPW with escort privileges must escort their visitors at all times.

At the end of the visit, TPW must escort their visitors back to the main lobby and return the visitor badges.

18.4 Firearms & Weapons: The possession of firearms and other weapons on USAA owned or leased property, including fleet vehicles and catastrophe offices, is strictly prohibited, unless permitted by law. Some examples of prohibited weapons include knives (other than pocket knives), martial arts weapons, commercial or handmade explosives, or any object designed, intended, or used to inflict bodily harm or injury to another person or property. Unauthorized possession of
firearms or weapons will be reported immediately to your employer. Each USAA campus complies with local and state firearms and weapons laws. For additional information regarding possession of firearms and weapons on USAA property, please contact USAA Security.

18.5 Court Orders: USAA’s obligation to provide a safe, secure working environment cannot be effectively accomplished unless USAA is informed about individuals who have been ordered by the courts, or other legally constituted entities, to remain away from the TPW seeking the court order. All TPWs who obtain or are the subject of a protective or restraining order are expected to provide to USAA Security:

- A copy of the petition and declarations used to seek the order;
- A copy of any temporary protective or restraining order; and, if applicable
- A copy of any permanent protective or restraining order.

USAA Security will treat this information as confidential as the circumstances permit. However, some information may need to be shared with the TPW’s operational department and/or other departments or the TPW’s employer (on a need-to-know basis only) in order to comply with the contents of the order.

Third Party Workers with Systems Access

19.0 Information Systems Access

All USAA information is considered restricted or confidential unless otherwise classified by a USAA authority, e.g. manager, director, executive management. USAA information systems are the nerve centers of our company’s operation, and defending and protecting these systems is absolutely vital to USAA’s financial well-being. If your assignment requires access to USAA’s systems, you must take all precautions to protect all systems and networks. Some examples of these precautions include but are not limited to preventing unknown or suspect communications from entering USAA systems; preventing unauthorized release of USAA proprietary, confidential, or sensitive information; and protecting information used to access USAA systems, such as personal passwords.

19.1 Security: Any actions, which might compromise or interfere with USAA’s technological security, are strictly prohibited. It is your responsibility to immediately contact USAA Systems Security immediately if you become aware of a security violation or if you suspect one might occur. Violation of USAA information security policies is prohibited and could result in civil or criminal prosecution by state or federal regulators, law enforcement agencies, or USAA.

19.2 Monitoring: Use of all company resources, including USAA systems and networks (including Supplier resources for call center operations), is subject to review, access, and monitoring, even if a private password or other private access code is used. Any use of company resources (including Supplier resources for call center operations) such as telephones, Internet, e-mail, or others is not private and you should not have any expectation of privacy when using such resources for personal use. USAA reserves the right to review, access, monitor, intercept, or delete any information communicated through or stored on its systems or networks at any time (including Supplier resources for call center operations). Inappropriate use of company resources is prohibited.

19.3 Systems Access: TPWs must be authorized by USAA to access USAA’s computer systems and are required to use their system Access Code and a unique personal password. Giving, lending, or sharing this information with any individual is a violation of system security. Systems
access violations is strictly prohibited and may result in prosecution by state, federal, regulatory or other civil authority.

**Basic Rules for System Security:**

1. Logoff before you leave  
2. Protect your password  
3. Watch out for viruses  
4. Use of the Internet, E-Mail, And Other Company Resources must be reserved for business use only.

**19.4 Social Media:** TPWs are prohibited from accessing Internal Social Media sites. Internal Social Media refers to interactive dialog on Connect or Corporate Intranet systems used for collaboration. Some examples include: My Sites, The Courtyard, Live Chats, and ICE. TPWs are also prohibited from accessing Enterprise Communities and commenting on My Sites or Enterprise News and Regional News.

Participation in Internal Social Media will be reported to your employer.

If you choose to use external social media, always protect USAA Information. You can share your personal experiences about USAA. Remember when you talk about what you have personally experienced, you are not speaking on behalf of USAA, but about USAA.