

Modern Slavery Statement

Slavery and Human Trafficking statement as required under s54, Part 6, of the Modern Slavery Act 2015 for the 2016 financial year

I. Introduction

USAA Limited is committed to ensuring that its business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

USAA Limited is committed to preventing slavery and human trafficking in its corporate activities and to ensure that its supply chains are free from slavery and human trafficking

II. Organisation Structure

This statement covers the activities of the USAA Limited which is based in the UK and its Claims branch which is based in Germany.

III. Whistleblowing

USAA Limited encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. USAA Limited's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

IV. Supply Chain Management

Whilst USAA Limited exercises a vital role in the provision of Insurance contracts to US Military Personnel and their families, it does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour.

As a general rule, contractors and suppliers used by USAA Limited are therefore not likely to be susceptible to this risk. However, we are mindful that others may not always uphold standards to the same level as USAA Limited. Consequently, employees responsible for managing suppliers and others involved with USAA Limited are, themselves, responsible for ensuring that our values and ideals are upheld. This continues to be a work in progress and we are strengthening our controls as new contracts are agreed. For example, serious violations by suppliers will lead to the termination of the business relationship.

V. Recruitment and Selection

USAA Limited uses only specified, reputable employment agencies to source labour. Appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports

USAA Limited does not employ individuals that would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

Basic rights which we expect all workers to enjoy, include:

- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

Signed on Behalf of the USAA Limited Board of Directors