INTERNAL DISPUTE RESOLUTION PROCEDURE
VOLVO CARS UK PENSION SCHEME (“THE SCHEME”)

Introduction

This policy is adopted by Vidett Trust Corporation Limited as sole corporate trustee of the Scheme (“Vidett” or “the Trustee”).

The purpose of this procedure is to provide a forum for resolution of complaints raised by any appropriate person (the “Complainant”) linked to the Scheme, to allow complaints to be investigated, considered and a decision reached in accordance with the terms of this policy.

This Procedure has two parts.

Part One is for Data Protection complaints only. Part One can be found on pages 1 and 2.

Part Two is for any other disputes arising between a Complainant and the Trustees of the Scheme (excluding Data Protection complaints). Part Two can be found on pages 3 to 5.

Please ensure you follow the part of this Procedure, which best aligns with the nature of your complaint.

<u>Part One: Data Protection Complaints</u>

From 19 June 2026, the Data (Use and Access) Act 2025 requires the Trustee, as data controllers, to have in place a process for handling complaints relating to the infringement of UK data protection legislation. The information below outlines the procedure which may be used to raise complaints relating to the handling of personal data by or on behalf of the Scheme. Use of this procedure does not affect an individual’s statutory right to raise concerns or lodge a complaint with the Information Commissioner’s Office.

Introduction

If you have any concerns in relation to the way your personal data has been handled or consider there has been a breach of the Data Protection Legislation in respect of your personal data, you can raise a complaint to the Trustee. This might include, for example, a complaint that your personal data has been processed without a lawful basis, that your data has been shared inappropriately or that the Trustee has failed to respond to a data subject access request within the required timescales. One way to raise a complaint is by completing the Data Protection Complaint Form (DP 1) and returning it to the Scheme Secretary by post or email using the details on the form.

Who may use the Procedure to make a data protection complaint

Any individual who is concerned that the Trustee has infringed Data Protection Legislation in the handling of their personal data.

Scope of the Procedure

This section of the Procedure applies specifically to complaints relating to data protection matters concerning the Scheme.

Process

If you have any concerns about our use of your personal information, you can you can raise a complaint to the Trustees by completing the Complaint Form (DP 1) and returning it to the Trustee Secretary by post or email.

The Trustees will acknowledge your complaint within 30 working days of receipt and then take appropriate steps to respond to your complaint (and inform you of the outcome) without undue delay. If the Trustees require further information in order to consider or respond to your complaint, we will let you know as soon as possible, but this may increase timeframes for the Trustees' response.

If you are not happy with the outcome, you can ask the Trustee to consider if they have a review process in place.

You also have the right to raise a complaint with the UK supervisory authority for data protection, the Information Commissioner's Office (**ICO**). You can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You can also contact them online, by accessing their website at **www.ico.org.uk** or by phone

<u>Part Two: Scheme Complaints</u>

This Procedure may be used to raise complaints relating to any other (non-Data Protection related) disputes arising between a Complainant and the Trustees.

This Procedure is not available in relation to disputes where either (a) proceedings have commenced before any court or tribunal or (b) the Pensions Ombudsman has begun an investigation.

This Procedure is divided into two stages.

- At Stage One, the decision is made by the client team allocated to each scheme (the "Stage One Decision Maker").
- If the Complainant is not happy with the result of that decision they may ask for the complaint to be reconsidered at Stage Two. At Stage Two, the decision is reviewed under the sole trustee oversight arrangements.

The Stage One Decision Maker also has the option to refer a complaint straight to Stage Two, and will inform the member where they reach this decision.

Who may use the Procedure

A person (a "Complainant") may make a complaint under this Procedure if they are (or were in the six months before they invoke this Procedure) or claim to be:

a) An active member, deferred pensioner or pensioner of any relevant Scheme; or
b) The widow, widower, surviving civil partner, surviving dependant or surviving non-dependent beneficiary of any person in a); or
c) A prospective member of any Scheme – i.e. eligible to become a member.

Representatives of Complainants

If a Complainant makes a complaint under this Procedure, they may appoint a representative to act on their behalf. The representative need not have any connection with the Scheme. If a Complainant dies, the application may be continued by his or her Personal Representatives. If a Complainant is a minor, or is for some reason incapable of acting on his or her behalf, the application can be made or continued by a member of his or her family or by some other suitable person.

Stage One - Complain to the Trustee

If the Complainant wishes to make a complaint, they must complete Form DP1 and send it to the Trustee. This form includes all the details required from the Complainant at Stage One.

A written acknowledgement of receipt of your form will be issued within **fifteen working days**. Please contact the Stage One Decision Maker if no acknowledgement is received.

Having fully considered the matters involved, the Stage One Decision Maker will make a decision about the complaint the Complainant has made. If the Stage One Decision Maker needs additional information in order to consider the complaint, they will contact the Complainant to request this information.

The Stage One Decision Maker will provide a written notice of their decision to the Complainant (and if applicable their representative) **within a reasonable period of not more than three months** of receipt of the properly completed Form IDR1 and any further information that may have been requested from the Complainant. The Stage One decision will include (where appropriate):

a) A statement of the decision
b) A reference to the legislation or Scheme rules relied upon
c) If a discretion has been exercised, a reference to the part of the Scheme rules which confers that discretion
d) A statement that the member has the right to refer the dispute for reconsideration by the Trustees under Stage Two of this procedure, within the timescales set out below.

If the Stage One Decision Maker is not in a position to reach a decision within three months of receipt of all required information, the Complainant will be notified of the reasons for the delay and given a revised date when the decision should be issued.

Stage Two – Appeal to the oversight arrangements

If the Complainant is not satisfied with the Stage One response, they may appeal to Vidett's sole trustee oversight arrangements for the complaint to be considered under Stage Two. Any complaints under Stage Two must be made within 6 months of the date when the Stage One decision is sent to the Complainant.

To appeal the Complainant must write to Vidett with all of the following information:

1. The information supplied under Stage One.
2. A copy of the initial decision.
3. A statement explaining why the Complainant is dissatisfied with the initial decision.
4. A statement that the Complainant wishes the complaint to be reconsidered by the Trustees.

Alternatively, the Stage One Decision Maker may also refer a Stage One complaint straight to Stage Two. Where relevant, the Stage One Decision Maker will inform the Complainant that the complaint is to be escalated to Stage Two without being considered under Stage One of this procedure.

At Stage Two, the sole trustee oversight arrangement will consider the matter and will make a decision. Written notice of the final decision will be issued to the Complainant (and if applicable their representative) **within a reasonable period of not more than three months** and will include (where appropriate):

a) A statement of the decision, and (where relevant) the extent (if any) to which it confirms or replaces the Stage One decision
b) A reference to the legislation or Scheme rules relied upon
c) If a discretion has been exercised, a reference to the part of the Scheme rules which confers that discretion
d) A statement that the Pension Ombudsman may investigate and determine any complaint or dispute of fact or law in relation to the Scheme, together with the contact details for the Pensions Ombudsman.

If Vidett needs longer than three months to consider the Stage Two complaint, they will inform the Complainant that they need longer to investigate the complaint, and will give a revised date when the decision should be issued.

Formal complaints

If you are dissatisfied with the Vidett's decision once you have completed the Internal Dispute Resolution Procedure, you may refer your dispute to the Pensions Ombudsman's formal complaint procedure. Contact about a complaint needs to be made within three years of when the event you are complaining about happened – or, if later, within three years of when you first knew about it. There is discretion for those time limits to be extended.

The Ombudsman can investigate and determine complaints or disputes of fact or law in relation to pension schemes. He has statutory powers to make binding determinations and to award compensation for maladministration. The Ombudsman will not usually investigate a complaint under this formal procedure unless a decision has first been made by the Trustees under the Internal Dispute Resolution Procedure.

The Ombudsman can be contacted in respect of a formal complaint at:

Telephone: 0800 917 4487 (select option for formal application)

Email: enquiries@pensions-ombudsman.org.uk

You can also write to the Pensions Ombudsman at:

The Pensions Ombudsman
10 South Colonnade
Canary Wharf
E14 4PU

The Pensions Ombudsman also operates an Early Resolution Service, details of which can be found at: https://www.pensions-ombudsman.org.uk/can-i-complain

Further information

MoneyHelper

If you have a general request for free information or guidance in connection with your benefits you can contact MoneyHelper (a service provided by HM Government/Money and Pensions Service) at:

MoneyHelper, 120 Holborn, London EC1N 2TD
Telephone: 0800 011 3797
Website: https://www.moneyhelper.org.uk