VIDETT LIMITED
INTERNAL DISPUTE RESOLUTION PROCEDURE
FOR SOLE CORPORATE TRUSTEE SCHEMES
VOLKSWAGEN GROUP PENSION SCHEME

Introduction

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

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 Trustee of the Scheme (excluding Data Protection complaints). Part Two can be found on pages 3 to 6.

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

Part One: Data Protection Complaints

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 Commission.

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 laws in the UK 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 (or their representative) who is concerned that the Trustee has infringed data protection laws in the UK 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 raise a complaint to the Trustee by completing the Complaint Form (DP 1) and returning it to the Scheme Secretary by post or email.

The Trustee 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 Trustee requires 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 Trustee's response.

It is highly likely that the information you provide (and any supporting documentation) in connection with your complaint will amount to "personal data" for the purposes of data protection laws. In some cases, the information provided may be "sensitive" (or "special categories") data – for instance, if it relates to the state of your health.

As with all data held by the Trustee, it will be stored securely and processed only in accordance with the Scheme's data protection policy and applicable legal requirements.

For more information on how and why the Trustee will process any personal data provided in connection with your complaint, and your legal rights in relation to that processing, please refer to the Scheme's privacy notice.

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 Commission. You can contact the Information Commission online, by accessing their website at www.ico.org.uk or by phone on 0303 123 1113.

Part Two: Scheme Complaints

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

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.

Scope of the Procedure

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. It is expected that members will complete Stage 1 and 2 of the IDRP (where appropriate) before pursuing a complaint to the Pensions Ombundsman.

Process

This procedure is explained in more detail below but is divided into two stages.

- At Stage One, the decision is made by the Trustee.
- 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 by the Vidett Trustee Oversight Board (VTOB).

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

Stage One - Complain to the Trustee

If the Complainant wishes to make a complaint, they must complete Form IDR1 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 the form will be issued within **fifteen working days**. Complainants are asked to contact the Trustee if no acknowledgement is received.

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

The Trustee 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 Vidett Trustee Oversight Board (VTOB) under Stage 2 of the IDRP.

If the Trustee 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 VTOB 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 VTOB 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 VTOB.

Alternatively, the Trustee may also refer a Stage One complaint straight to Stage Two. Where relevant, the Trustee 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, VTOB 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 VTOB 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 complainants are dissatisfied with the Trustee's decision once they have completed the Internal Dispute Resolution Procedure, they may refer the dispute to the Pensions Ombudsman's formal complaint procedure. The complainant must contact the Pensions Ombudsman about a complaint within three years of the event being complained about or, if later, within three years of the complainant first being aware of 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 the complainant has completed the process set out in this 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

Complainants 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

General requests for free information or guidance in connection with pension benefits can be sought from 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/en