THE CO-OPERATIVE PENSION SCHEME (PACE)

INTERNAL DISPUTE RESOLUTION PROCEDURE

Pace Trustees Limited (the "Trustee") is the trustee of Pace and has adopted this Internal Dispute Resolution Procedure ("IDRP") in accordance with sections 50 to 50B of the Pensions Act 1995.

The purpose of the IDRP is to resolve disagreements about matters relating to Pace fairly and efficiently. The IDRP applies to both the Co-op Section and the Co-operative Bank Section of Pace.

1. Scope of the IDRP

1.1. The IDRP applies to:

- Active, deferred and pensioner members of Pace (including those in service and those no longer in service);
- The widow, widower, civil partner or other surviving dependants or potential beneficiaries of a deceased member of Pace;
- Prospective members of Pace;
- A person who, on a member's death, is entitled to benefits from Pace but who is not financially dependent on the member;
- Any person who ceases to be in one of the above categories, if that person's application under the IDRP is made within six months after ceasing to be in one of the above categories; and
- Any person claiming to be in one of the above categories

(each a "Complainant").

1.2. An application under the IDRP must be made in writing by either the Complainant or by a representative nominated by the Complainant to make the application on their behalf. Where the Complainant has died the application may be made in writing or continued by their personal representatives, and where the Complainant is a minor or is otherwise incapable of acting on their own behalf, the application must be made in writing, or be continued, by a representative (such as a family member or other appropriate person).

1.3. A complaint under the IDRP must be between a Complainant and the Trustee, although it may relate to a decision or action taken on behalf of the Trustee by either or both of the following parties:

1.3.1. The Co-op Pensions Department ("CPD") - who administer Pace on behalf of the Trustee; and/or

1.3.2. Aptia - who administer benefits in relation to members who were members of the former Plymouth and/or Yorkshire Funds and who are now in the Co-op Section of Pace.

The complaint must concern matters relating to Pace. A complaint in relation to a Complainant's employer is outside the scope of the IDRP.

1.4. Subject to the six-month time limit referred to in paragraph 1.1 above, the Complainant or their representative must raise their complaint within twelve months from the date on which they first became aware of the matter to which the complaint relates. However, the Trustee maintains a discretion to decide to investigate the complaint if it is raised outside of this time period.

1.5. A complaint will fall outside the scope of the IDRP if proceedings in respect of it have been commenced in any court or tribunal, or if the Pensions Ombudsman has commenced an investigation into the complaint. Similarly, if a complaint is raised under the IDRP, any such investigation / proceedings (by a court, tribunal or the Pensions Ombudsman) that subsequently commence before the IDRP is completed will result in the complaint under the IDRP ceasing immediately.

2. Initial Disagreement Stage

2.1 A complaint must initially be raised with the CPD Member Services Manager at the address noted in paragraph 5 below.

2.2 The Complainant or their representative shall provide complete details of the complaint, including any relevant background information and supporting evidence. The following information should also be provided:

- The full name, address, telephone number, email address and date of birth of the Complainant.
- Where the Complainant is a member, their National Insurance Number.
- Where the Complainant is not a member, details of the relationship between the Complainant and the relevant member, including the full name, address and date of birth of that member.
- Where the Complainant is using a representative, the full name, address, telephone number and emails address of the Complainant's representative, whether replies should be addressed to that person, and proof that the Complainant has authorised the representative to act on their behalf.

2.3 Following receipt of the complaint, the CPD Member Services Manager will write to the Complainant (or their representative, as applicable) within ten working days to acknowledge receipt of the complaint. They will also provide a copy of this IDRP in order to advise that the following services are available to assist with complaints about occupational and personal pension schemes:

Money Helper

MoneyHelper is a free, not-for-profit advice service provided by the government-sponsored Money and Pension Service (MaPS). It is made up of

three government-backed financial guidance providers (Money Advice Service, the Pensions Advisory Service and Pension Wise).

It is available to assist with any difficulties Pace members or beneficiaries may have in relation to their pension benefits. They can provide free and impartial guidance and information relating to pension benefits, and the steps which can be taken to resolve any concerns. Their contact details are:

Telephone: 0800 011 3797

Website: www.moneyhelper.org.uk

(The website offers contact options of live webchat, enquiry form and social media channels)

Address: MoneyHelper, Money and Pensions Service, Bedford Borough Hall, 138 Cauldwell Street, Bedford, MK42 9AB

The Pension Ombudsman

Generally, the Pensions Ombudsman will only carry out a formal investigation once the IDRP has been completed and the Trustee's decision has been issued. However, in certain cases (e.g. where a member is particularly vulnerable, where the situation is time-critical and/or where the risk of financial harm is high), their team of volunteer advisers may be able to support individuals prior to, or during, the IDRP process.

The Pensions Ombudsman can be contacted using the details outlined in paragraph 4.3 below.

2.4 If the CPD Member Services Manager is of the view that key information is missing, they will request this in the acknowledgment letter and the timescale for dealing with the complaint (see paragraph 2.5 below) will not commence until this information is received.

2.5 The CPD Member Services Manager will investigate the complaint and respond in writing within three calendar months of the date that all relevant details of the complaint have been received. If the case is complex and more time may be needed, an interim reply will be sent stating the reason for the delay and the expected date of decision.

3. Formal Internal Dispute Resolution Procedure

3.1. If the Complainant (or their representative) remains dissatisfied with the response received from the CPD Member Services Manager and would like the Trustee to reconsider their complaint, they should write to the Pace Scheme Secretary at the address noted in paragraph 5 below within six months of receiving the decision, requesting that the complaint be progressed through the Trustee's formal Internal Dispute Resolution Procedure.

3.2. If the information set out in paragraph 2.2 above has not already been provided, then the Complainant should provide this information. The Complainant should also confirm the detail of any additional points they would like to raise or supply any additional supporting information they would like to be considered.

3.3. The Pace Scheme Secretary will write to the Complainant (or their representative, as applicable) within ten working days to acknowledge receipt of the complaint.

3.4. The Trustee will review the complaint and any supporting evidence and will make a decision within four months of receipt of all the relevant details of the complaint. If it not possible to meet this timescale, an interim reply will be sent stating the reason for the delay and the expected date of a decision.

3.5. In reaching a decision, the Trustee will make its own enquiries and consult its professional advisers as it sees fit. The Trustee may delegate the investigation and determination of the complaint to a sub-committee of the Trustee.

3.6. The Trustee may request any additional information it requires. If this occurs, this will pause the four-month period referred to in paragraph 3.4 above. If this is the case, the Trustee will inform the Complainant of this when writing to request any additional information.

3.7. All personal information provided will be stored securely and processed only in accordance with Pace's data protection policy and applicable legal requirements. The Trustee may need to share information with its advisers and suppliers in order to take advice from them or carry out further investigations. Please see paragraph 6 below for further information about data protection.

3.8. The Pace Scheme Secretary will notify the Complainant of the Trustee's decision within fifteen working days of the date of the decision.

3.9. A copy of this IDRP will be sent with the decision to confirm that if the Complainant is unhappy with the formal response from the Pace Scheme Secretary, they can refer their complaint to the Pensions Ombudsman free of charge.

3.10. The Pensions Ombudsman may investigate or determine any complaint or dispute of fact or law in relation to Pace made, or referred to, under the Pension Schemes Act 1993. Generally, the Pensions Ombudsman will only carry out a formal investigation once the IDRP has been completed and the Trustee's decision has been issued. Further information about the Pensions Ombudsman (including contact details) is set out in section 4 below.

4. The Pensions Ombudsman

4.1. The Complainant has the right after completion of the IDRP to refer their complaint to the Pensions Ombudsman free of charge. The Pensions Ombudsman is an independent and impartial statutory body which deals with

complaints and disputes which concern the administration and/or management of occupational and personal pension schemes.

4.2. Contact with the Pensions Ombudsman about a complaint needs to be made within three years of when the event(s) you are complaining about happened – or, if later, within three years of when you first knew about it (or ought to have known about it). There is discretion for those time limits to be extended.

4.3. The Pensions Ombudsman can be contacted at:

Address: 10 South Colonnade, Canary Wharf, London, E14 4PU
Telephone: 0800 917 4487
Email: enquiries@pensions-ombudsman.org.uk
Website: www.pensions-ombudsman.org.uk

A complaint can also be submitted online at:
www.pensions-ombudsman.org.uk/making-complaint

5. Contact Details

The CPD Member Services Manager, the Pace Scheme Secretary and the Trustee can all be contacted at:

Co-op Pensions Department
Department 10406
1 Angel Square
Manchester
M60 0AG

6. Data Protection

6.1 It is very likely that information provided by a Complainant (or their representative) in connection with a complaint will amount to "personal data" for the purposes of data protection law. In some cases, the information may be "sensitive" (or "special categories") data – for instance, if it relates to a person's health.

6.2 As with all personal data which is held by the Trustee, this data will be stored securely and processed only in accordance with the Pace 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 a complaint, and the Complainant's (or their representative's) legal rights in relation to that processing, please see Pace's detailed privacy notice, which is available here:

Co-op Section: https://coop.pacepensions.co.uk/privacy-policy/

Co-operative Bank Section: https://bank.pacepensions.co.uk/privacy-policy/

7. Data Protection Complaints

7.1 Some complaints may include concerns about how personal data has been processed, as well as issues relating to the administration of benefits under Pace. Where a complaint relates solely to the processing of personal data, it will normally be considered under the Trustee's data protection complaints procedure (available from the Pace website from the link noted in section 6.2 above) rather than this IDRP.

7.2 If you are unsure whether your complaint relates to the administration of your benefits, the use of your personal data, or both, you should only submit one complaint and do not need to submit separate complaints.

7.3 Where a complaint is concerned with both data protection and administration of benefits, the Trustee will determine the appropriate process (or processes) to apply. This may involve:

- Considering aspects of the complaint under this IDRP; and/or
- Considering aspects of the complaint under the Trustee's data protection complaints procedure.

25 June 2026