ELECTRICITY SUPPLY PENSION SCHEME

THE INTERNAL DISPUTE RESOLUTION PROCEDURE OF ELECTRICITY PENSIONS TRUSTEE LIMITED

1. The Internal Dispute Resolution Procedure (IDRP) of Electricity Pensions Trustee Limited (EPTL) in relation to those matters for which EPTL is responsible under the provisions of the Electricity Supply Pension Scheme (ESPS) as Scheme Trustee shall consist of a one stage process.

2. The IDRP can be used for cases where there is alleged or actual maladministration or in cases where there is a dispute over fact or law. IDRP matters for which EPTL is responsible as Scheme Trustee under the Scheme Rules are limited to those functions performed by EPTL and not by Group Trustees.

   NOTE: If at any time after an application has been made under this IDRP the disputed matter becomes an "exempted dispute" the resolution of the complaint under this procedure will cease. An "exempted dispute" is one in respect of which proceedings are begun in any court or tribunal, or which has been referred to, and is being investigated by, the Pensions Ombudsman.

Time limits for applications for decisions

3. Subject to paragraph 4 below, an application for a decision under EPTL's IDRP must be made by a complainant (or his/her representative) within three years of the date of the act or omission which is the subject of the complaint or dispute, unless in the opinion of the directors of EPTL the complainant was unaware of the act or omission at the date it occurred, in which event, the application must be made by the complainant (or his/her representative) within three years from the earliest date on which the complainant was aware, or should have been aware.

4. Where the three year time limit has been exceeded and where it is considered that the circumstances are appropriate, the Scheme Secretary may in his or her absolute discretion nevertheless agree that the application may be considered under the IDRP.

5. Where the complainant is a person to which sub-paragraph (e) or (f) of Section 50A(1) of the Pensions Act 1995 applies (namely a person who has ceased, or claims to have ceased, to be a member, beneficiary, or prospective member) an application for a decision must be made, in accordance with the Pensions Regulator's Code of Practice number 11, within six months of the date of ceasing to be a member, beneficiary or prospective member. However, where the six month time limit has been exceeded, the Scheme Secretary may in his or her absolute discretion, where they consider that the circumstances are exceptional, nevertheless agree that the application may be considered under the IDRP.

6. Each case where the exercise of discretion outside the time limits is applied should be reported by the Scheme Secretary to the EPTL Board.

Process

7. Applications for a decision in respect of complaints or disputes by a complainant (or his/her representative) in relation to matters for which EPTL is responsible under the Scheme Rules must be made in writing on an IDR application form, attached as Appendix A to this procedure. The complainant should be asked to forward the written application direct to the Scheme Secretary (currently at Capita, ESPS Team, Hartshead House, 2 Cutlers Gate, Sheffield, S4 7TL).

8. On receipt of the written application, the dispute will be considered by the EPTL Board. EPTL will establish the scope of the complaint and in situations where the complaint being made relates to a breach by the Trustee of data protection legislation, the procedure in Appendix B shall be followed. If a complaint relates wholly to other matters, the process set out below shall be followed. If the complaint relates to some data matters and some non-data matters, EPTL will either split it into two complaints (one under each process) or shall adhere to both processes (so for instance shall reach a decision without undue delay and within 2 months).

9. Notice of the decision will be given direct to the complainant (and his/her representative, if applicable) by the Scheme Secretary within a reasonable period, normally 2 months of receipt of the written application.

10. Where it will not be possible for notice of the Board's decision to be given within the 2 months, an interim reply will be sent to the complainant (and his/her representative (if any)) explaining the reasons for the delay and indicating the date on which it is expected that a decision will be given.

11. The notice of the decision of the EPTL Board will contain the decision and brief reasons for it and shall be supplied to the complainant within a reasonable period, normally 15 working days of the decision having been made. It will inform the complainant that the Pensions Ombudsman may investigate and determine any complaint or dispute of fact or law in relation to the Scheme in accordance with the Pension Schemes Act 1993 and shall supply contact details for the Pensions Ombudsman.

EPTL June 2026

APPENDIX A

ELECTRICITY SUPPLY PENSION SCHEME

DISPUTE RESOLUTION PROCEDURE OF THE SCHEME TRUSTEE, ELECTRICITY PENSIONS TRUSTEE LIMITED

FORMAL COMPLAINT

SECTION A: DETAILS OF MEMBER

If you are a member, former or prospective member, please insert the following information. If you are a widow(er) or dependant of a deceased member, or are acting on behalf of a member or deceased member, please insert the following information about that member.

Full Name:

Address:

Date of Birth:

National Insurance Number

SECTION B DETAILS OF COMPLAINANT IF OTHER THAN MEMBER

Please complete this section if you are the widow(er) or dependant of a deceased member.

Full Name:

Address:

Date of Birth:

Relationship to the deceased member:

SECTION C DETAILS OF REPRESENTATIVE

If this form is being completed by a representative of the Complainant or the Complainant wishes to be represented by another person please insert the following information:

Full name of Representative:

Address of Representative:

Relationship of Representative
to the Complainant:

Address to which correspondence
in relation to the complaint should be sent:

SECTION D DETAILS OF COMPLAINT

Please set out below the nature of your complaint, including relevant dates, and give details as to why you are aggrieved. (It would be of assistance in this context if you could enclose copies of any relevant correspondence which you have had in relation to the event concerned.)

SECTION E DATA PROTECTION

Please confirm whether your complaint relates to data protection:

I wish the complaint, details of which are given in Section D above, to be considered under the Scheme Trustee, Electricity Pensions Trustee Limited's Resolution of Disputes Procedure or the data protection complaints policy, as appropriate.

Signed..... Date.....
(Complainant/Representative of the complainant*)

* delete whichever does not apply.

APPENDIX B

ELECTRICITY SUPPLY PENSION SCHEME

DATA PROTECTECTION COMPLAINTS POLICY OF THE SCHEME TRUSTEE, ELECTRICITY PENSIONS TRUSTEE LIMITED

Introduction

1. The Data (Use and Access) Act 2025 introduced a requirement from 19 June 2026 for trustees of an occupational pension scheme, among others, to have in place a procedure for resolving complaints relating to any alleged breach by the trustees of data protection legislation by the way in which the trustees have handled personal information.

2. This procedure is to be followed in situations where the complaint being made is in respect of such a breach by EPTL of data protection legislation.

Process

3. The Scheme Secretary will acknowledge receipt of the complaint on EPTL's behalf within 30 days and will then inform the complainant that the complainant may complain to the Information Commissioner's Office (the "ICO") as well as to EPTL and will give the complainant the contact details for the ICO as set out below.

Enquiries and Information to Complainant

4. EPTL must without undue delay make appropriate enquiries in response to a complaint, and keep complainants informed of the progress of EPTL's investigation. EPTL must inform the complainant of, and explain to the complainant, any delays in the EPTL's investigation of the complaint.

Notice of Decision

5. A decision will be made without undue delay by EPTL on the complaint and communicated in writing without undue delay to the complainant. The notice giving the decision will include:

    a) a statement of the decision;
    b) reference to any legislation relied upon; and
    c) a statement that the complainant may complain to the ICO, and the contact details for the ICO:
    Helpline Phone Number – 0303 123 1113 (the ICO's normal working hours are 9am to 5pm Monday to Friday);
    Webchat/email options – please check the ICO's website at https://ico.org.uk/about-the-ico