

Veolia UK Pension Plan Veolia Energy Pension Scheme Internal Disputes Resolution & Data Protection Complaints Procedure

June 2026



Introduction

The Trustee of the Veolia Energy Pension Scheme and the Veolia UK Pension Plan (both referred to as “the Scheme”), those involved with its day-to-day management and Isio, the Scheme’s Administrator, seek to administer the Scheme and its benefits in the most efficient way possible within reasonable timeframes. **However**, from time to time, things may inadvertently go wrong and you may feel that you have grounds for a complaint. This policy explains what your options are for complaining about your Scheme pension.

If you have concerns about your pension or disagree with a decision that has been made, please contact Isio first to discuss the matter. Many issues can be resolved through direct communication, as they often stem from misunderstandings that can be clarified or corrected. Isio's contact details are listed at the end of this document.

If your issue cannot be resolved or you are not satisfied with the information or service provided by Isio, then you have the option of formally escalating your complaint about your pension, first to Veolia Pensions Department (“VPD”) and then to the Trustee for review under the Scheme’s Internal Disputes Resolution Procedure (“IDRP”). This document provides more detail about how and when you can use the IDRP.

What is the IDRP?

The Trustee is required by law to put in place a formal procedure for resolving disputes about matters relating to the Scheme between the Trustee and members. The Trustee has, therefore, set up a two-stage complaints process.

What can be investigated under the IDRP?

You can use the IDRP to have any disagreement you may have with the Trustee or the Scheme’s Administrator in relation to your Scheme pension investigated and reviewed.

There may be occasions, if you are still employed by Veolia (“the Employer”), when your complaint may relate to something within your Employer’s remit (e.g. deduction of pension contributions) and outside of the Trustee’s control. In such cases, your issue will not be able to be considered under the IDRP and you should raise the matter directly with your Employer using your Employer’s normal grievance procedure.

You can also use the IDRP to raise “data protection complaints” if you think that the Trustee (or one of its “data processors”) has infringed data protection legislation in the way your personal information, or the personal information of the person you are representing, has been handled. You can find more information about “data protection complaints” in the “Handling Data Protection Complaints” section.

Who can use the IDR?

You can use the IDR if you are:

- A. a current member of the Scheme
- B. a former member of the Scheme with deferred benefits
- C. receiving a pension from the Scheme
- D. a widow, widower, surviving civil partner, including pensioners or dependants of deceased Scheme members
- E. a surviving non-dependant beneficiary of a deceased member of the Scheme
- F. a prospective member of the Scheme or an employee of a participating employer who may join the Scheme at the Trustee's discretion (although in practice the Scheme is now closed to new entrants)
- G. no longer in any of the above categories, but you bring your complaint under the IDR within six months of the date you ceased to be in one of the above categories.
- H. anyone who claims to be in one of the above categories and the dispute relates to whether the individual is such a person.

When making your complaint, you are able to choose someone else to represent you and present your case - for example, a friend, relative, solicitor or union representative.

If a person who falls within A-H above has died, an application may be made or continued on behalf of that person by their personal representative.

If a person who falls within A-H above is a minor or lacks capacity to personally make the complaint, they may be represented by a member of their family or any other suitable person, such as a solicitor.

Please note that any person whose data is processed by or on behalf of the Trustee (or claims that there has been such processing) can bring a data protection complaint, even if they do not fall within A-H above.

Are there any time limits?

There are no time limits for making a complaint under **Stage 1** of the IDR, with one exception: if you fall into category G above, the time limit is six months from the date at which you ceased to have an interest in the Scheme.

Applications for your complaint to be reviewed under **Stage 2** of the IDR must be received within six months of the receipt of the Stage 1 decision.

See also the information on The Pensions Ombudsman.

Who completes the IDR?

Under **Stage 1** of the IDR, an appropriate member of VPD considers the issues raised and the information provided, taking advice from the Trustee's professional advisers if required, and reaches a decision.

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Under **Stage 2** of the IDRP, the Trustee considers the issues raised and the information provided, taking advice from its professional advisers as appropriate, and reaches a decision.

How to apply

To make an application under **Stage 1**, you should complete the form attached at the end of this document.

An application form for **Stage 2** will be provided with your Stage 1 decision letter.

In both cases, you should send the completed form, together with any continuation sheets and copies of supporting documentation via email (scanned or photos) or post to:

Email: pensions.vesuk@veolia.com

Mail: The Chair
Veolia UK Pension Trustees Limited
c/o Veolia Pensions Department
Veolia UK Limited
8th floor
210 Pentonville Road
London
N1 9JY

Information you must provide with your application

To help us identify you correctly, when completing your application form, please make sure you provide your:

- > Title
- > Full name
- > Date of birth
- > National Insurance Number
- > Member Number
- > Address

If you appoint a representative to make the application on your behalf, you must also provide the following details about them:

- > Title
- > Full name
- > Address; and
- > Details of their relationship to you

What happens once you have submitted your application?

VPD will review your application upon receipt to check that it can be considered under the IDRP. If your application cannot be accepted, VPD will contact you to advise why **within 10 working days of receipt**.

If your application can be accepted, VPD will write to you to acknowledge your application **within 10 working days of receipt**.

Under **Stage 1**, VPD will review your application to determine if any further information is needed and liaise with any other relevant parties as appropriate (e.g. Isio, the Trustee's legal advisers, the Scheme Actuary, etc) to discuss the issues raised and gather any further relevant information to obtain a full picture of what has occurred and sufficient information with which to make a decision. As part of this, VPD may contact you directly for further information or clarification. VPD will also speak to those who caused the original complaint to get their view of what happened before reaching a final decision.

Under **Stage 2**, VPD will prepare a summary of the facts, details of the decision reached at Stage 1 and the reasons why you are unhappy with the Stage 1 outcome and present it, together with all the supporting information, to the Trustee for review and a decision.

How long will it take?

The Pensions Regulator expects that **Stage 1** decisions will be made within four months of the Stage 1 application being received. However, if VPD is able to reach a decision sooner, it will do so.

The Pensions Regulator also expects that **Stage 2** decisions will be made within four months of the Stage 2 application being received. However, if the Trustee is able to reach a decision sooner, it will do so.

Due to the complex nature of pensions, in some cases the investigation may take longer than four months. If either VPD or the Trustee needs more time, VPD will contact you to let you know and will keep you informed of the progress of your case, the reason for the delay and the expected timeframe for reaching a decision.

The decision

You will receive a letter advising you of the outcome of the review of your Stage 1 or Stage 2 application **within 21 days** of a decision being reached. The letter will set out if your complaint has been upheld, partially upheld or not upheld and will set out the reasons for the decision. It will also tell you about the next steps you can take.

What happens if you're not happy with the decision?

If you are unhappy with VPD's decision at Stage 1, you can ask the Trustee to review the decision under Stage 2 of the IDRP. If you still feel that your complaint remains unresolved after receiving your Stage 2 decision, you can appeal to The Pensions Ombudsman. More information is provided about The Pensions Ombudsman in the next section.

Additional Help

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MoneyHelper

MoneyHelper is the consumer-facing money and pensions guidance arm of the Money & Pensions Service. It brings together the support and services of three government-backed financial guidance providers: the Money Advice Service, the Pensions Advisory Service and Pension Wise. The Pensions & Retirement section of its website has guidance on dealing with pension problems. You can contact MoneyHelper using the details below:

Website: www.moneyhelper.org.uk

Phone: 0800 011 3797 (Lines open Monday to Friday from 09:00 to 17:00)

Submit an online query:

www.moneyhelper.org.uk/en/contact-us/pensions-guidance/pensions-guidance-enquiry-form

The Pensions Ombudsman (TPO)

The Pensions Ombudsman is an independent organisation set up by law to deal with pension complaints. Their service is free and they can look at complaints about the way personal and occupational pension schemes are run.

TPO expects anyone bringing a complaint to them to first give the party they think is at fault a chance to put things right. In practice, for anyone complaining about the Scheme, this means first going through the Internal Disputes Resolution Procedure before making an application to TPO.

There are some time limits for taking a complaint to TPO. In most cases, applications need to be made within three years of the event being complained about or, if later, within three years of when you became aware of the issue or should have been aware of the issue. TPO has discretion to extend these time limits where reasonable to do so.

You can find out more information about making complaints to TPO on its website or by contacting it using the details below.

Website: www.pensions-ombudsman.org.uk

Email: enquiries@pensions-ombudsman.org.uk

Phone: 0800 917 4487 or +44 20 7630 2200 if calling from abroad
Lines are open from 10:00 to 14:00 Monday to Friday

Live chat: Live chat window available on website from 09:00-10:00 and 14:00 to 17:00
Monday to Friday when the phone lines are not open

By mail: Pensions Ombudsman
10 South Colonnade
Canary Wharf
London E14 4PU

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Isio

Isio is the Scheme's Administrator and should be your first port of call for any queries or complaints. You can contact Isio using the details below.

Website: www.pensions.veolia.co.uk (You can submit an online enquiry via the Contact Us section)

Email: veolia@isio.com

Phone: 0800 122 3590

By mail: Isio
PO Box 108
Blyth
NE24 9DY

Data Protection

The Trustee is a "controller" for the purposes of the Data Protection Act 2018 and the UK General Data Protection Regulation (as it forms part of domestic law by virtue of section 3 of the European Union (Withdrawal) Act 2018) and as such, is subject to statutory requirements to protect your personal data.

The Trustee has a legal obligation to process and a legitimate interest in processing personal data relating to you in administering the Scheme (this may include providing personal data to third parties).

We pay pass information you provide in relation to your complaint to the Trustee's administrators, advisers (including legal and actuarial advisers) and, if we consider it appropriate in the circumstances of your complaint to the Employer as the Scheme's sponsoring employer.

We may also need to process sensitive personal data (including special categories of personal information such as data concerning racial or ethnic origin, religious beliefs, health or sexual orientation) for the purpose of considering and making a decision in relation to your complaint, for example, if your complaint is about an application you have made about an ill health early retirement. We may process your complaint (including any sensitive information) where it is necessary in order to comply with our legal obligations or to respond properly to the complaint. However, we will only process this sensitive data if it is necessary for reaching a decision on the case or for the Trustee to comply with its legal obligations or to defend a claim

A copy of the Trustee's data protection privacy notice is available on the member website (www.pensions.veolia.co.uk) or upon request.

Handling Data Protection Complaints

A slightly different procedure applies where the complaint is (whether in full or in part) a data protection complaint.

Individuals are entitled to bring a data protection complaint against the Trustee (as data controller, or joint controller or against its data processors), either as part of a general IDRP complaint, or as a standalone complaint. Any person whose data is processed by or on behalf of the Trustee (or claims that there has been such processing) may bring a data protection complaint against the Trustee, even if they are not otherwise entitled to make an IDRP complaint.

The Trustee will accept a data protection complaint in whatever format it takes. However, individuals who make a data protection complaint are encouraged to use the IDRP complaints form to the extent possible.

Where a complaint relating to processing of data is made to the Scheme's Administrator or any other data processor acting on the Trustee's behalf, they will refer the complaint to the Trustee as soon as possible, and the Trustee will then deal with the complaint in accordance with this Policy.

A member or other individual exercising their data protection rights (for example a subject access request for copies of their personal information or requesting deletion of their information) is not considered a complaint for these purposes and will not be considered as such by the Trustee.

Data protection complaints (either in addition to, or as part of a complaint under the general IDRP process), should follow the standard IDRP process but subject to the following additional requirements (which are in line with the Information Commission's ("IC") guidance on data protection complaints):

An acknowledgment will be sent within 30 days.

- > If the Trustee can provide an outcome to the data protection complaint sooner than any other aspects of the IDRP complaint, it will do this.
- > If the investigation is likely to take some time, the Trustee will follow up on the initial response so the complainant knows that they are working to resolve the issue.
- > The complainant will be notified that they can escalate their data protection complaint to the IC. There is no obligation to wait for the second stage of the IDRP to conclude before escalation to the IC.

The Trustee will also keep a record of:

- > the date the data protection complaint was received;
- > the acknowledgment;
- > any relevant conversations and documents;
- > the outcome of the complaint; and
- > any actions taken as a result of the investigation.

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Approved by the Board: 11 June 2026
Version Control

Version No	Revision Date	Revised by	Revision Description	Approved
1.0	n/a	n/a		
2.0	April 1997			
3.0	June 2003			
4.0	October 2004			
5.0	December 2004			
6.0	April 2008			
7.0	September 2009			
8.0	September 2012			
9.0	October 2013			
10.0	December 2014			
11.0	July 2016			
12.0	March 2017			
13.0	October 2023			
14.0	September 2025	S Drake / CMS	Update wording & references, return to two phases and include Isio	25/09/2025
15.0	June 2026	S Drake / CMS	Update to include data protection complaints wording for compliance with the Data (Use and Access) Act 2025	11/06/2026

VEOLIA ENERGY PENSION SCHEME / VEOLIA UK PENSION PLAN

APPLICATION UNDER THE INTERNAL DISPUTES RESOLUTION PROCEDURE
STAGE ONE

Member / Complainant Details

Full Name:		Title:	
Date of Birth:		NI No:	
Member No:			
Address:			

Representative Details (if you have asked someone to represent you)

Full Name:		Title:	
Relationship to member:			
Address:			

Statement of Application

Please give a statement of the nature of the disagreement with sufficient details to show why you are aggrieved. If necessary, continue details on an additional page and attach it to the application form together with any supporting documents.

If your complaint relates wholly or partially to a data protection matter, please include details (where possible) of the specific personal data concerned and the nature of the alleged breach.

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Statement of Application Continued

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Declaration

Member's Signature:		Date:	
Representative's Signature: (If applicable)		Date:	