Internal Dispute Resolution Procedure Avon Rubber Retirement and Death Benefits Plan (the Plan)

Scope

This procedure is intended to be used to resolve all difficulties encountered by Plan members and other beneficiaries.

It should be used for all complaints relating to the Plan, except for complaints which are being investigated elsewhere, for example by the Pensions Ombudsman.

Only complaints made about matters relating to the Plan will be deemed valid and this procedure will not be used to consider complaints in relation to the Employer.

All issues relating to the Plan should first be raised through the complaints procedure operated by the relevant Plan administrator before being submitted to the Trustee under this procedure.

Defined Benefit Plan Administrators: Aptia Group Limited

www.aptia-group.com/en-gb/contact

Avon Rubber Retirement & Death Benefits Plan, c/o Aptia Group Limited, Maclaren House, Talbot Road, Stretford, Manchester, M32 0FP

Member Helpline: 0800 046 6183

Defined Contribution Plan Administrators: Standard Life

https://www.standardlife.co.uk/contact-us#online-account-login

Standard Life, Dundas House, 20 Brandon Street, Edinburgh, EH3 5PP.

Member Helpline: 0345 278 5641

Eligibility

The following people are eligible to submit a complaint under this procedure:

- Active, deferred and pensioner members.
- Prospective members.
- A widow, widower, surviving civil partner or surviving dependant of a deceased member.
- A surviving, non-dependant beneficiary of a deceased member of the Plan. This is someone who, one the death of the member, is entitled to the payment of benefits under the Plan.
- A person who claims to be in one of the categories above and the dispute relates to whether he or she is such a person.

- Representatives nominated by anyone in any of the above categories (or by a personal representative if the complaint concerns someone who is deceased, or by a suitable person if the complaint concerns a child or someone who is otherwise incapable of acting for themselves).

Any person who has ceased to be in one of the categories above may also raise a complaint within 6 months of ceasing to be in one of the above categories or within 6 months of becoming aware of the matter behind the complaint.

The Trustee has a one stage dispute procedure as detailed below.

Making a complaint

Complaints should include the following information on the form at the end of this document:

- If you are the member, your full name, address, date of birth and national insurance number.
- If you are the widow, widower, civil partner or surviving dependant of a deceased member, the name, address and date of birth of the deceased member, and your relationship to the member.
- If you are a representative, the members name, address and date of birth and the address for correspondence.
- A full explanation of the complaint including copies of supporting documents, correspondence and a timeline.

Information you provide in relation to your complaint will be processed in accordance with the Plan's Privacy Notice (Privacy policy) and may be passed to the Plan's administrators or advisers, the Secretary to the Trustee, the Scheme Actuary or the Plan's legal adviser for input.

Complaints should be addressed to:

Avon Rubber Pension Trust Limited
Avon Technologies Plc
Hampton Park West
Semington Road,
Melksham, Wiltshire
SN12 6NB,
United Kingdom

pensions@avon-technologiesplc.com

Conflicts of Interest

The Trustee Board will follow the Plan's Conflicts of Interest Policy to identify and deal with any real or perceived conflicts of interest that relate to your complaint.

Process for resolving your complaint

Once received your complaint will be acknowledged in writing within 5 working days.

Following the investigation (during which you may be asked to supply more information) you will receive a written decision from the Trustee Board which includes the following information:

- A statement of the decision.
- Reference to the documentation and/or legislation relied on.
- Information about how to refer a complaint, or a point of fact or law, to the Pensions Ombudsman.

Timescales for decision

The Trustee Board will aim to communicate its decision as soon as reasonably practicable and no later than (i) **four** months after receipt of your complaint; and (ii) within **21** working days of the decision having been made.

If it is not possible to reply in line with the above a revised timescale will be confirmed together with the reason for the delay.

Because the Trustee has adopted a one stage process there is no right of appeal against the Trustee's decision.

Data complaints

If you have an issue regarding how your personal data has been handled, you have the right to raise a complaint. This will be handled in accordance with the Trustee's data complaints process.

Your complaint will be acknowledged within 30 days and investigated and responded to without undue delay. If you are not satisfied with the outcome, you have the right to complain to the Information Commissioner's Office ("ICO"). Further details can be found on the ICO's complaints page.

Other options available to you

The following organisations may be able to assist you with your complaint:

The Pensions Ombudsman	The Pensions Ombudsman may investigate and determine complaints and disputes which concern the administration and/or management of occupational and personal pension schemes. Please note that the Pensions Ombudsman will normally only consider a complaint once you have tried to resolve it, for example via this IDRP process. Contact with the Pensions Ombudsman 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.

	You can complete a complaint form on their website (www.pensions-ombudsman.org.uk/making-complaint) or contact them at: 10 South Colonnade Canary Wharf London E14 4PU Tel: 0800 917 4487 and select the option to make a formal application Email: CentralSupportMailbox@pensions-ombudsman.org.uk
The Money and Pensions Service	The Money and Pensions Service provides information and guidance on a wide range of financial issues. The MoneyHelper, which is part of the Money and Pensions Service provides professional, independent, and impartial help with pensions for free. Services include independent information and general guidance on pensions matters. MoneyHelper can be contacted at: Money and Pensions Service Bedford Borough Hall, 138 Cauldwell Street, Bedford, MK42 9AP Tel: 0800 011 3797 Website: www.moneyhelper.org.uk Email: contact@maps.org.uk or on 01159 659570.

IDRP Application Form
Avon Rubber Retirement and Death Benefits Plan (the Plan)

Please complete all relevant sections in capitals

Your details

Name:	
Address:	
Postcode:	
Contact number:	
Email:	
Date of birth:	
National Insurance number	

Representative details

Please complete if you have a representative acting on your behalf. If no representative, please leave this section blank and move to the next section.

Name:	
Address:	
Postcode:	
Contact number:	
Email:	

Should this address be used for notifying the decision or any requests for additional information? YES / NO

Complaint details

Does your complaint relate to your membership or prospective membership of the Plan? YES / NO

If yes please provide details of your membership – for example, whether you are an active, deferred* or pensioner member of the Plan, and the date you joined the Plan.

*a deferred member is someone who is no longer an employee but has not yet taken their Plan benefits (i.e. not retired or transferred their benefits to another provider)

Membership status:	**Active / deferred / pensioner / prospective member / former member**
Date joined Plan:	
Date left Plan (if applicable):	

Does your complaint relate to another person who is a Plan member? YES / NO

If yes, please provide as much information as possible relating to the member:

Member's name:	
Member's address:	
Member's postcode:	
Member's date of birth:	
Member's date of death (if applicable)	
Member's National Insurance number	
Your relationship to the member:	

Complaint details

Please provide details of your complaint, with copies of any supporting documents or correspondence. Please continue on a separate page if necessary and include a timeline.

Signed:	
Name:	
Date:	

Please send this application to: Avon Rubber Pension Trust Limited, Avon Technologies plc, Hampton Park West, Semington Road, Melksham, Wiltshire SN12 6NB, United Kingdom

pensions@avon-technologiesplc.com

NOTE: This complaint will not be dealt with under the Plan's IDRP if the Pensions Ombudsman has started investigating this complaint or court or tribunal proceedings have been commenced. By signing and returning this form, you are confirming that no investigation or proceedings have commenced.

You should receive an acknowledgement of your complaint within the next five working days.