

# **Ladbrokes Pension Plan**

## **Formal Internal Disputes Resolution Procedure**

When a complaint about the Ladbrokes Pension Plan (“the Plan”) cannot be resolved informally, the Trustees have adopted a Formal Internal Dispute Resolution Procedure. The procedure is a two stage process. The details of which are set out overleaf.

The procedure only applies to disagreements with the Trustees. If a disagreement is with the employer, the Trustees will refer the matter to the employer and will notify the complainant that they have done so.

Members with complaints about the Plan can invoke the procedure. Appendix 1 lists other people who may also use the procedure. Any person bringing a complaint under the procedure may act by a representative. Appendix 1 also explains the other circumstances when a representative may be used.

## **First stage**

The Pensions Manager at Ladbrokes plc is appointed to consider the complaint at the first stage.

Complainants must provide the following information to the Pensions Manager:

- the complainant's full name, address, date of birth and National Insurance number;
- if the complainant is the widow, widower, surviving civil partner or dependant of a deceased member, details of their relationship to the member and the member's full name, address, date of birth and National Insurance number;
- the full name and address of any representative who is acting on behalf of the complainant, stating whether or not all future correspondence should be addressed to that person; and
- a detailed written explanation of the complaint or dispute and all evidence the complainant has in support of the complaint or dispute. For example, all correspondence concerning the complaint or dispute.

The complaint should be made in writing and signed by, or on behalf of, the complainant. The complaint should be sent to:

Ladbrokes Pensions Manager  
Ladbrokes plc  
Imperial House  
Imperial Drive  
Rayners Lane  
Harrow  
Middlesex  
HA2 7JW

Once an application is received under this procedure, the complainant must be informed that the Pensions Advisory Service ("TPAS") is available to assist members and beneficiaries of the Plan in connection with any unresolved difficulties with the Plan and provide the contact address for TPAS.

Upon receipt of the application, the Pensions Manager will acknowledge receipt of the complaint and will then provide a full written response to the complainant (or their representative) no later than two months after the complaint is received, and in any event within 15 working days after a decision has been made. If a full written response is not provided within two months, an interim reply will be sent to explain the reasons for the delay and give an indication of when a response can be expected.

The full written response will:

- explain the decision the Pensions Manager has made;
- refer to any legislation relied upon;
- refer to any relevant Plan rules or other provision relied upon;
- confirm the complainant's right, within six months from the date of the full written response, to ask the Trustees to reconsider the matter;
- provide details of how to apply to the Trustees for reconsideration of the complaint; and
- explain to the complainant that TPAS is available to assist members and beneficiaries of the Plan in connection with any unresolved difficulties with the Plan and provide the contact address for TPAS.

## Second stage

If the complainant is not satisfied with the Pensions Manager's decision, they have the right to apply to the Trustees to reconsider the complaint. This application must be made within six months of the date of the Pension Manager's full written response.

The following information must be included with the application to the Trustees:

- the complainant's full name, address, date of birth and National Insurance number;
- if the complainant is the widow, widower, surviving civil partner or dependant of a deceased member, details of their relationship to the member and the member's full name, address, date of birth and National Insurance number;
- the full name and address of any representative who is acting on behalf of the complainant, stating whether or not all future correspondence should be addressed to that person;
- a copy of the full written response from the Pensions Manager;
- the reasons why the complainant is dissatisfied with the response from the Pensions Manager; and
- a statement that the complainant wishes the Trustees to reconsider the complaint.

The application should be made in writing and signed by or on behalf of the complainant. The application should be sent to:

The Trustees of the Ladbrokes Pension Plan  
c/o The Secretary to the Trustees  
Hymans Robertson LLP  
One London Wall  
London EC2Y 5EA

The Trustees will acknowledge receipt of the complaint and will then provide a full written response to the complainant (or their representative) no later than two months after the application is received and in any event within 15 working days after a decision has been made. If a full written response is not provided within two months, an interim reply will be sent to explain the reasons for the delay and give an indication of when a response can be expected.

The full written response will:

- explain the decision the Trustees have made;
- confirm whether (and to what extent) the Pensions Manager's decision has been upheld or changed;
- refer to any legislation relied upon;
- refer to any relevant Plan rules or other provision relied upon;
- explain to the complainant that TPAS is available to assist members and beneficiaries of the Plan in connection with any unresolved difficulties with the Plan and provide the contact address for TPAS; and
- state that the Pensions Ombudsman may investigate and determine any complaint or dispute of fact or law in relation to the Plan and provide the Pensions Ombudsman's address. The Pensions Ombudsman will not consider a case unless the complaint has first been raised through the Plan's Formal Internal Disputes Resolution Procedure process and the process has been concluded.

The Trustees' decision is the final stage of this procedure.

## ***Exempt disputes***

If after an application is made under this procedure, the dispute becomes an “exempt dispute” under the law, the resolution of the dispute ceases.

An exempt dispute is broadly when:

- proceedings in respect of the dispute have been commenced in any court or tribunal; or
- the Pensions Ombudsman has commenced an investigation in respect of it as a result of a complaint made or a dispute referred to him.

## ***Appendix 1***

### ***1. People who can use the Formal Internal Disputes Resolution Procedure***

The following categories of people may invoke the procedure:

- (a) members of the Plan;
- (b) widows, widowers, surviving civil partners and surviving dependants of a deceased member of the Plan;
- (c) any person who, on the death of a member, is entitled to the payment of benefits under the scheme;
- (d) prospective members;
- (e) anyone who ceased to be in any of the above categories in the six months before the date of a complaint is made to the Pensions Manager under the procedure; and
- (f) anyone whose complaint is that they should be treated as being in one of the above categories and who brings a complaint under this procedure within six months of the claim.

### ***2. Other circumstances where a representative may be used***

If the complainant dies, a complaint may be made or continued on their behalf by their personal representative.

If a complainant is a minor or otherwise incapable of acting for themselves, a complaint may be made or continued on their behalf by a member of their family or some other person suitable to represent them.