

BRISTOL-MYERS SQUIBB PENSION PLAN

Internal Dispute Resolution Procedure

Introduction

It is the intention of the Trustee and the Company that all matters relating to the Bristol-Myers Squibb Pension Plan (the Plan) are dealt with in accordance with the Trust Deed and Rules and current legislation. There may be occasions where a dispute arises and for such circumstances it is necessary to follow a procedure to help resolve such disputes. This notice sets out the procedure and is referred to as the Internal Dispute Resolution Procedure (IDRP).

This Procedure has two parts:

Part One is for Data Protection complaints only. Part One can be found on pages 1 and 2 of this procedure.

Part Two is for any other disputes arising between a Complainant and the Trustee of the Plan (excluding Data Protection complaints). Part Two can be found on pages 2 to 4 of this procedure.

Please ensure you follow the Part of this procedure which best aligns with the nature of your complaint. If your complaint includes both Data Protection and non-Data Protection issues, the Data Protection aspects will be handled under Part One and the other aspects under Part Two.

Part One: Data Protection Complaints

From 19 June 2026, the Data (Use and Access) Act 2025 requires the Trustee, as data controllers, to have in place a process for handling complaints relating to the infringement of UK data protection legislation. The information below outlines the procedure which may be used to raise complaints relating to the handling of personal data by or on behalf of the Plan. Use of this Procedure does not affect an individual's statutory right to raise concerns or lodge a complaint with the Information Commissioner's Office.

Introduction

If you have any concerns in relation to the way your personal data has been handled or consider there has been a breach of the data protection legislation in respect of your personal data, you can raise a complaint to the Trustee. This might include, for example, a complaint that your personal data has been processed without a lawful basis, that your data has been shared inappropriately or that the Trustee has failed to respond to a data subject access request within the required timescales. To raise such a complaint please complete the form enclosed and returning it to the Trustee by post or email using the details on the form.

Who may use the Procedure to make a Data Protection Complaint

Any individual who is concerned that the Trustee has infringed Data Protection Legislation in the handling of their personal data.

Scope of the Procedure

This section of the Procedure applies specifically to complaints relating to data protection matters concerning the Plan.

Process

If you have any concerns about our use of your personal information, you can raise a complaint to the Trustee by completing the enclosed form and returning it to the Trustee by post or email.

The Trustee will acknowledge your complaint within 30 days of receipt and then take appropriate steps to respond to your complaint (and inform you of the outcome) without undue delay. If the Trustee requires further information in order to consider or respond to your complaint, you will be informed as soon as possible, but this may increase timeframes for the Trustee's response.

If you are not happy with the outcome, you can ask the Trustee to consider if they have a review process in place.

You also have the right to raise a complaint with the UK supervisory authority for data protection, currently the Information Commissioner's Office (ICO). You can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You can also contact them online, by accessing their website at www.ico.org.uk or by phone.

Part Two: Plan Complaints

This Procedure may be used to raise complaints relating to any other (non-Data Protection related) disputes arising between a Complainant and the Trustee.

Who may use the procedure?

You may make a complaint under this procedure if you:

- are a member or beneficiary of the Plan;
- are someone entitled to benefits following a member's death;
- have ceased to be a member or beneficiary; or
- claim to be in one of the categories above and the dispute relates to this.

Complaints are considered from the following:

- the Complainant;
- a representative nominated by the Complainant;
- a personal representative of a Complainant who has died; or
- someone who is acting on behalf of a Complainant who is incapable of acting (e.g. a minor).

Procedure

You should put your complaint in writing using the form provided below and send it to the Secretary to the Trustee of the Bristol-Myers Squibb Pension Plan, either by email or by post.

Email: bms@vidett.com

Post:

Bristol-Myers Squibb Pension Plan
c/o Karen Henderson
Vidett
Forbury Works
37-43 Blagrove Street,
Reading
RG1 1PZ

Receipt of your complaint will be acknowledged within 10 working days of the date that the complaint was received. Your complaint will be investigated, and usually a decision will be made within four calendar months of the receipt of the form. You will then be notified of the decision no later than 15 working days after the decision has been made. If the investigation takes longer than four months, you will be informed accordingly, including an explanation about the reason for the delay and the expected date that a full response will be made.

The response will set out the following:

- a statement of the decision;
- reference to any relevant legislation or Plan documentation;
- if a discretionary power is involved, the source of that power; and
- the role and address of The Pensions Ombudsman (TPO) to whom a higher appeal may be made if deemed appropriate.

Further Information

You may choose to go directly to the Pensions Ombudsman's Early Resolution Service (ERS) (contact details below) before or during your complaint via the IDRPs.

If you are not satisfied with the outcome of the ERS and would like to bring a formal complaint to the Pensions Ombudsman, then you will first need to have brought a complaint through the IDRPs.

Pensions Ombudsman

You have the right to refer your complaint to The Pensions Ombudsman free of charge. The Pensions Ombudsman deals with complaints and disputes which concern the administration and/or management of occupational and personal pension schemes.

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.

The Pensions Ombudsman can be contacted at:

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

You can also submit a complaint form online:

<https://www.pensions-ombudsman.org.uk/making-complaint>

If you have general requests for information or guidance concerning your pension arrangements contact:

MoneyHelper
Tel: [0800 011 3797](tel:08000113797)
Website: www.moneyhelper.org.uk

Data Protection

In order to administer the Bristol-Myers Squibb Pension Plan, including for the purposes of considering any dispute under the Internal Dispute Resolution Procedure, the Trustee needs to hold and process information about you and this information may be passed to the Plan's professional advisers and administrators. The information may also be passed to the Company, and other previously participating employers, for employment purposes. At all times your personal information will be held and processed in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. In particular, we consider that the processing of any special categories of data which is carried out as part of this Internal Dispute Resolution Procedure is necessary in order to establish and defend legal claims and so is permitted under the relevant legislation. A copy of the Trustee's data protection privacy notice is available at:

<https://schemes.vidett.com/wp-content/uploads/BMS-Privacy-Notice-May-2024.pdf>

**Bristol-Myers Squibb Pension Plan
Internal Dispute Resolution Form**

Please select all that apply to the nature of your complaint

Data Protection Complaint

☐

Non-Data Protection Complaint

☐

Part 1

Details of Plan Member or Data Subject [To be completed in all cases. Member specific details to be completed only where applicable]

Full Name	
Address	
Email address	
Telephone number	
Date of Birth	
National Insurance No.*	
Member Category	Deferred / Pensioner / Other / Not Applicable

**Required only if you are a Plan Member or are making a Non-Data Protection Complaint on behalf of or in respect of a Plan Member. Where you are making a complaint on behalf of a Plan Member, please provide the Plan Member's National Insurance number here.*

Part 2

Details of Person Making the Complaint

[To be completed only if different from the person named in Part 1 above]

Full Name	
Address	
Email address	
Telephone number	
Date of Birth	
Relationship to person named in Part 1	

Part 3***Details of Representative acting on behalf of Complainant (if any)***

Full Name	
Address	
Email address	
Telephone number	

Part 4***Details of Complaint***

A statement of the complaint together with sufficient details to demonstrate why you are aggrieved must be provided in the space below.

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If Data Protection Complaint

Data subject rights exercised (if any) – see Trustee’s Privacy Notice.	
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Signed	(by or on behalf of the Complainant)	Date	
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This Form must be signed and dated in order to register your complaint under Part Two of this Procedure, but we ask that you sign and date this Form still even where you are only using this Form to make a complaint under Part One.

Please return the completed form to:

Email: bms@vidett.com

Post: Bristol-Myers Squibb Pension Plan
c/o Karen Henderson
Vidett
37-43 Forbury Works
Blagrove Street
Reading
RG1 1PZ