

THE BANKS GROUP OF COMPANIES

MODERN SLAVERY ACT 2015 POLICY AND STATEMENT

INTRODUCTION

The Modern Slavery Act 2015 (“the Act”) came into effect on 29 October 2015. This statement is made pursuant to Section 54 (1) of the Act and constitutes the Banks Group’s slavery and human trafficking statement for the financial year ending 30 September 2023. It sets out the steps we have taken, and continue to take, to ensure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.

THE BANKS GROUP STRUCTURE AND ITS BUSINESS

The Banks Group is a family owned County Durham based business, with offices in Scotland and Northumberland, and employs around 170 people. The organisation operates across the North of England and Scotland, and is involved in:

- Mineral Extraction
- Infrastructure Services
- Property development
- Plant Maintenance Services

This statement applies to each of our group holding companies and all of their subsidiary companies, regardless of their turnover.

OUR POLICIES

The following policies underpin our zero tolerance approach to slavery and human trafficking, both from our own aim to comply with the Act and also our expectation that our suppliers and their supply chains will take all reasonable and practicable steps to comply with the Act:-

- this policy and statement
- our Development with Care Policy
- our pre-qualification process and standard terms of business
- our Corporate Responsibility policies and procedures including:-
 - Human Rights
 - External Grievance and Reporting
 - Anti Bribery and Corruption
 - Public Interest Disclosure (whistleblowing)
 - Personal Conduct
 - Equal Opportunities
 - Environmental and Sustainability
 - Social Media
 - Community

DEVELOPMENT WITH CARE

Development with Care is a continuing statement of our intent to meet the expectations of those affected by our work. The key strands of Development with Care are:-

COMMUNITY – how we support the wider community both for areas hosting our projects and nationally.

ENVIRONMENT - how we seek to leave positive environmental legacies from our projects.

OUR PEOPLE – how we manage the issues that affect the people who work for us.

OUR BUSINESS PARTNERS – how we work fairly with our suppliers and how we promote local businesses.

Our vision is for our business, people, communities and the environment to move forward together

OUR PROCESSES

Our procurement activities take place in England and Scotland and take two forms, namely the requirement for the supply of goods and the supply of professional services and contractors.

Our professional advisors and contractors are UK and EU based, whilst our suppliers of goods are predominantly UK, EU and USA based global organisations.

Our key suppliers are required to complete a rigorous pre-qualification exercise prior to appointment which requires them to provide us with their Ethical Procurement Policy and commitment to operate in accordance with our 'Development with Care' approach in terms of engagement with local communities.

Our standard terms and conditions used for the whole supply chain have been adapted to ensure our professional advisors, contractors and suppliers comply with the provisions of the Modern Slavery Act 2015 and the Bribery Act 2010 and GDPR.

FURTHER STEPS TO BE UNDERTAKEN

We are committed to continually review and monitor our supply chain to ensure that high standards of ethical procurement are maintained.

RESPONSIBILITY FOR, AND COMPLIANCE WITH THIS POLICY

The Boards of each of our group holding companies have overall responsibility for ensuring that this statement complies with our legal and ethical obligations under the Act. The Boards of each of our principal operating subsidiary companies have adopted its principles and have committed to its implementation. All staff working for and with us (including employees, consultants, contractors and agency workers) are encouraged to report any concerns about modern slavery in any part of our business in accordance with our Personal Conduct and Public Interest Disclosure policies.

This statement was approved by the Boards of The Banks Group Holdings Limited and each of its associated companies and their principal operating subsidiaries (as listed below) on 20 March 2024.

and signed by

A handwritten signature in blue ink that reads "Harry Banks".

Harry Banks OBE DL
Chairman and Chief Executive

This statement applies to the following entities, all of which are UK based

Banks Group Holdings Limited
The Banks Group Limited
H.J Banks & Company Limited
Banks Brothers Transport Limited
Banks Developments Limited
Banks Property Limited
Banks Property Development Limited
Banks Property Development (Bathgate) Limited
H.J Banks (Construction) Limited
Banks Homes Limited
Mount Oswald Estate Management Limited
Bowesfield Management Company Limited
Sheraton Park Management Limited
Banks Renewables Holdings Limited