



BANKSGroup
development with care

Human Rights Policy

The Banks Group develops, with care, land for a variety of uses including surface coal mining, property and renewable energy. We are dedicated to the adoption of internationally recognised human rights standards in all our operations throughout the group.

The purpose of our Human Rights Policy is to communicate to our employees, customers, suppliers, stakeholders, and the communities we serve, the ethical and social values we respect and our commitment to uphold human rights by promoting our *development with care* values ensuring that we conduct our activities in a responsible manner with consideration for the environment, for local communities in which we operate and for our customers, employees and suppliers.

What are Human Rights?

Human Rights are the universal rights that every human being is entitled to enjoy and to have protected. They are most appropriately defined as those rights that require us to treat others as we ourselves would want to be treated, and which protect us as individuals and groups from abuses of power. We have put in place a series of human rights principles across all business sectors supported by policies adopted by our Group Board.

General principles

We are committed to performing our business to the highest standard of ethics and in accordance with our values. We are open and fair in dialogue with all our stakeholders and commit to communicate effectively and courteously with external parties. We respect all fundamental human rights and will be guided in the conduct of our business by the provisions of the United Nations Universal Declaration of Human rights (UNUDHR), the International Labour Organisation's (ILO) core labour standards and national legislation.

Employee relations

We aim to ensure that no form of discrimination is practiced in any area of our business, including recruitment, compensation, promotion, training, termination or retirement based on race, colour, ethnic origin, gender, age, religious beliefs, disability, marital status, social class, nationality, sexual orientation, gender reassignment or employment status.

We recognise our employees have the right to join trade unions and are committed to ensuring that our employees

are able to work in an environment free of physical, psychological or verbal abuse, the threat of abuse and sexual or other harassment and, accordingly such actions are forbidden.

In accordance with legislation, best practice and a prevailing knowledge of our industry we shall take all reasonable steps to prevent accidents and injury to health arising out of, associated with or in the course of work, by minimising so far as is reasonably practicable the causes of hazards inherent in the working environment.

All employees shall receive an appropriate level of training to enable them to perform their duties.

Social responsibility

ENVIRONMENTAL IMPACT

We operate an environmental policy to support the continued development of all our businesses whilst maintaining a high standard of environmental performance in line with our *development with care* approach.

We recognise that our activities may have the potential to make a significant change to both the environment and local communities, and that it is our responsibility to maximise environmental benefits and minimise any adverse impacts arising from these activities. This is applied group-wide to both projects and across all offices.

We produce environmental management plans for each of our projects detailing how significant environmental issues, such as noise, waste management and emissions to water or air are to be controlled.

We are committed to continuing the achievement of our environmental policy objectives throughout the design, development and operation of our projects and the operation of our business.

COMMUNITY RELATIONS

Our *development with care* approach is at the heart of all we do; it embodies the Banks Group's values. We interact with people inside and outside our company and it is the guiding principle of the way we carry out our business at all times. The key aspects of *development with care* include:

- To inform the local community or its representatives of our intentions to ensure they have an opportunity to respond to our proposals.
- For our schemes to provide tangible benefits to local people, maximising both community and environmental benefits.
- To encourage open channels of communication with the community throughout the life of the scheme.
- To be transparent with regard to environmental and planning issues.
- To involve the community in the design stages of our proposals where possible.

Communication

The Banks Group undertakes to ensure that its Human Rights Policy and those policies which underpin it are communicated to customers, suppliers, directors, management and our employees effectively by all available media including but not limited to the group's HR management guidelines,

induction packs, notice boards, company Intranet, and training courses aimed at ensuring acceptable levels of understanding within management and employees.

Responsibilities

The Banks Group expects its employees, managers and supply chain to maintain the highest standards of compliance with our principles. It is management's responsibility to communicate the expected standards to our employees and ensure that they conduct themselves in an appropriate manner. Employees who are in breach of our human rights principles will be subject to disciplinary action in accordance with the group's HR management guidelines.

Our procurement processes and contractual terms place robust obligations upon the organisations in our supply chain to comply with all applicable laws, regulations and codes relating to the prevention of bribery, corruption and modern slavery and to provide us with continuing evidence of their compliance.

Review

This policy shall be reviewed on a three year basis and as and when necessary to reflect changes in relevant legislation.

Signed for and on behalf of the Group Board:

Harry Banks

HARRY BANKS
CHAIRMAN
January 2019