

THE BANKS GROUP OF COMPANIES

MODERN SLAVERY STATEMENT

INTRODUCTION

This statement is made under Section 54 (1) of the Modern Slavery Act 2015 (the “Act”) and constitutes the Banks Group’s slavery and human trafficking statement for the financial year ending 30 September 2025. It applies to each of our group holding companies and their subsidiary companies, regardless of their turnover.

This statement sets out the steps we have taken, and continue to take, to ensure that slavery and human trafficking is not taking place within our supply chain or in any other part of our business. It covers six key areas in compliance with statutory guidance:

1. Organisation structure and supply chains;
2. Policies in relation to slavery and human trafficking;
3. Assessing and managing risk;
4. Due diligence;
5. Training; and
6. Monitoring and evaluation.

1. Organisation structure and supply chains

Banks Group business and structure

The Banks Group is a family-owned County Durham headquartered business, with a regional office in Yorkshire, and employs around 185 people. The organisation operates across the North and East central areas of England as well as Scotland, and is involved in:

- Housebuilding
- Mineral extraction; and
- Property development

Our supply chains

Our professional advisors and contractors are UK based, whilst our suppliers of goods are predominantly UK based global organisations. Banks Group has a zero tolerance to slavery and human trafficking within our supply chains. We request confirmation within our supplier pre-qualification process that the supplier operates in compliance with the Act and has not been convicted of any offence under the Act. We also include Modern Slavery compliance provisions within our standard conditions for the purchase of goods and services and also in the supplier framework agreement used by our housebuilding business, and in each case, we require our suppliers to do likewise with their connected supply chain.

2. Our policies in relation to slavery and human trafficking

Banks Group is committed to ensuring that modern slavery or human trafficking does not take place within our supply chains or our business. A chain of accountability exists for the prevention of modern slavery, with the Boards of our group holding companies having overall responsibility for ensuring that this statement and our related practice comply with our legal and ethical obligations under the Act. The Boards of each of our principal operating subsidiary companies have also 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.

The following policies underpin our zero-tolerance approach to slavery and human trafficking, both in respect of our own compliance with the Act and also our expectation that our suppliers and their supply chains do likewise: -

- Our Anti-Slavery Policy and this 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
 - Personal Conduct
 - Equal Opportunities
 - Environmental and Sustainability
 - Social Media
 - Community

These policies are available to staff via our Intranet and are reviewed on an ongoing basis.

3. Assessing and managing risk for modern slavery and human trafficking

Within our strategy to identify and mitigate risk of modern slavery or human trafficking occurring within our supply chains or our business, we have undertaken the following activities:

- 3.1 We have ensured that all employees understand the concept of modern slavery, the associated risks and the requirement to report it if discovered;
- 3.2 Within our recruitment activities we carry out right to work in the UK checks;
- 3.3 We include within employees' inductions the requirements of the Act and we ensure that our Anti-Slavery Policy is available on our Intranet on a continued basis;
- 3.4 Our procurement process encompasses our suppliers' confirmed compliance with the Act with the issue being specifically highlighted to our suppliers; and
- 3.5 Our standard terms and conditions and our supplier framework agreements require compliance with the Act, oblige any subcontractors to do likewise and allow us to exit contracts where modern slavery is identified as a risk.

4. Due Diligence

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

- 4.1 Community - how we support the wider community both for areas hosting our projects and more widely.
- 4.2 Environment - how we seek to leave positive environmental legacies from our projects.
- 4.3 Our People - how we manage the issues that affect the people who work within our business.
- 4.4 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.

The due diligence we undertake in relation to Modern Slavery predominantly focuses on our suppliers.

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

Our 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. We also make specific enquiry in relation to our supplier's compliance with the Act.

5. Training and awareness

To ensure understanding of the risks of modern slavery and human trafficking throughout our business and supply chains we induct new employees in relation to modern slavery and human trafficking when they join our business and we ensure that our Modern Slavery Policy is available on an ongoing basis to our employees.

6. Monitoring and Evaluation

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

We will act promptly and decisively where an issue with compliance either with this statement or the Act has been reported to us or otherwise identified.



This statement was approved by the Boards of Banks Group Holdings Limited and each of its associated companies and their principal operating subsidiaries on 24 March 2026. It is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Banks Group's slavery and human trafficking statement for the financial year ending 30th September 2025.



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
H & J Banks Investments Limited
CM West Rainton Management Company Limited
The Pastures Selby Management Company Limited