



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 2017. 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 350 people. The organisation develops land for a variety of uses across the North of England and Scotland, as follows:

- Surface coal mining
- Property development
- Generation of renewable energy

The business operates and restores its own surface coal mines along with managing a portfolio of its own Wind Farms.

This statement applies to our parent company The Banks Group Limited and all of its 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 Corruption and Bribery
 - Public Interest Disclosure (whistleblowing)
 - Personal Conduct

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.

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

MARKETPLACE – how we work fairly with our suppliers and how we promote local businesses.

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.

In 2015 and 2016 we developed two pioneering charters that ensure that local communities and businesses benefit from our projects. The first – Connect2Renewables – relates to our windfarm sites and the second – Connect2BanksMining – to our surface coal mine sites. Both prioritise the award of contract opportunities, job creation and training initiatives to those businesses within the immediate locality of our projects.

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 recently been adapted to ensure our professional advisors, contractors and suppliers comply with the provisions of the Modern Slavery Act 2016 and the Bribery Act 2010.

FURTHER STEPS TO BE UNDERTAKEN

In 2016 our surface mining company became the first mining company anywhere in Europe to be awarded approved supplier status by the global Bettercoal Initiative. We have worked with the Bettercoal assessors on a programme of continuous improvement measures which have strengthened our delivery of Corporate Responsibility and Development with Care during 2017.

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 Board of the Banks Group Limited has 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 Board of The Banks Group Limited on 29 March 2018.

and signed by

Harry Banks OBE DL
Chairman and Chief Executive