



ENVIRONMENT POLICY

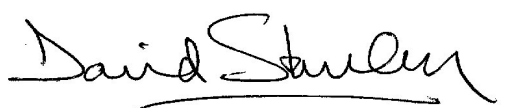
Penspen is an engineering and management company, providing services to the oil and gas industry for over 50 years. Penspen has expertise in all aspects of onshore and offshore pipelines and associated facilities, including pipeline integrity services, emergency response and operation and maintenance for existing pipelines and facilities.

Penspen Group is committed in all its world wide operations to achieving the highest standard of environmental protection. In order to assure that this commitment is achieved it is a requirement of the Board that the Penspen Group has a comprehensive Environmental Management System (EMS) in full compliance with EN ISO 14001.

Specifically, Penspen Group will:

- Comply as a minimum with all relevant environmental legislation and regulations. The interest of other interested parties including local communities will also be considered in relation to company operations. This policy will be made available to all such interested parties and to the public.
- Identify and control the environmental impacts arising from its business.
- Develop and maintain effective contingency plans, where appropriate, in conjunction with the authorities and emergency services.
- Strive for continual improvement of the EMS for the protection of the environment and prevention of pollution. This will include the establishment of key environmental objectives and the monitoring of performance against those objectives.
- Provide direction and training to all employees to ensure awareness of all environmental issues relevant to their roles and responsibilities in implementing this policy. This is a current key environmental objective for the Penspen Group.
- Require contractors to demonstrate an acceptable level of environmental performance.
- Provide appropriate resources to implement the policy.
- Ensure compliance with this policy through a continual process of education, review and audit.

This policy statement is an expression of Penspen's commitment to operational excellence and its belief that protection of the environment shall be considered as a basic management responsibility.

Signed: 

D N Stanley
Chief Executive Officer
Penspen Limited

Date: 5th January 2009