



PENSPEN GROUP HEALTH & SAFETY 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.

The Penspen Group recognises that the protection of health and safety of its employees and others involved in, or affected by, its operations are an integral part of the Company's business performance and a prime responsibility of management at every level. In order to assure that this commitment is achieved it is a requirement of the Board that the Penspen Group has a comprehensive Occupational Health and Safety Management System (OHSMS) in full compliance with BS OHSAS 18001:2007.

Specifically, the Penspen Group will:

- Maintain a statement of its key health and safety objectives and monitor performance against those objectives.
- Identify the health and safety hazards arising from its business, and assess and manage the associated risks to prevent injury and ill health to its employees, its contractors and members of the public.
- Develop and maintain effective contingency plans, where appropriate, in conjunction with the authorities and emergency services.
- Comply as a minimum with all health and safety legislation and associated codes of practice and co-operate fully with relevant enforcement agencies. The interest of others parties including local communities will also be considered. This policy will be made available to all such interested parties.
- Strive to continually improve its health and safety performance.
- Provide direction, training and supervision to ensure that employees are aware of all health and safety issues relevant to their activities, as well as their role and responsibilities in implementing this policy both to work safely and with due consideration for the health and safety of others.
- Require contractors to demonstrate an acceptable level of health and safety performance.
- Seek to understand and take account of the health and safety concerns of employees, clients
- Provide appropriate resources and training 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 health and safety shall be considered as a fundamental management responsibility.

Signed:

D N Stanley
Chief Executive Officer
Penspen Limited

Date: 20th May 2011