

BOOTS & COOTS

FAIR DISCLOSURE POLICY

This Fair Disclosure Policy (this "Policy") sets forth our commitment to fair disclosure of information about Boots & Coots and its subsidiaries (collectively, "Boots & Coots") without advantage to any particular analyst or investor, consistent with Regulation FD-Fair Disclosure ("Regulation FD") promulgated by the U.S. Securities and Exchange Commission (the "SEC"). We will continue to provide current and potential shareholders access to all material information concerning Boots & Coots in accordance with all applicable securities laws. We will also provide investors access to management when practicable and consistent with Regulation FD. We believe it is in Boots & Coots' best interest to maintain an active and open dialogue with current and potential shareholders regarding our historical performance and future prospects while complying fully with all applicable securities laws.

I. Compliance

We will comply with all reporting and disclosure requirements contained in all applicable securities laws, including Regulation FD and the rules and regulations of the New York Stock Exchange. It has been, and will continue to be, our practice to disclose material information about Boots & Coots publicly and not selectively. Boots & Coots expects the strictest compliance with this Policy by all directors, officers and employees.

II. Compliance Guidelines

Boots & Coots has established the following guidelines to ensure compliance with Regulation FD and to avoid selective disclosure of material non-public information:

A. Disclosure

We will post this Policy on our website, as well as any changes to this Policy as they occur.

B. Designated Spokespersons of Boots & Coots

1. Persons authorized to communicate on behalf of Boots & Coots to analysts and securities market professionals and associates thereof, shareholders, investment companies and affiliates thereof and representatives of the media (the "Designated Persons") are limited to the Chief Executive Officer and President, the Chief Financial Officer, the Chief Operating Officer and the Director of Investor Relations (the "Primary Spokesperson").
2. Other officers and employees of Boots & Coots may communicate with Designated Persons only after a Primary Spokesperson has (i) authorized such officer or employee to communicate with specified Designated Person(s) and (ii) reviewed and authorized the scope and content of such communication for disclosure to such Designated Person(s).
3. No officer or employee is authorized to communicate to any person information about Boots & Coots that is material non-public information, except through disclosure made in a manner authorized by Counsel.

C. Quarterly Earnings Release Conference Calls

1. We will issue quarterly earnings releases and furnish such documents to the SEC on a current report on Form 8-K. In connection with quarterly earnings releases, we will make financial supplements available on our website.
2. Shortly after the issuance of each quarterly earnings release we will hold a conference call open to the public and the media (in listen-only mode). Advance public notice about the call will be made through a media release, by electronic distribution and posting on our website.
3. A playback of the conference call and transcript will be provided on our website for approximately one month after the conference call.
4. We realize how important it is for you to receive prompt replies from us. We will do our best to respond to inquiries as soon as we can. If questions are of interest to a wider audience, we may also post our answers on our website and/or furnish them to the SEC in a current report on Form 8-K. We do not intend to post on our website or furnish to the SEC all of the questions posed to us.
5. We will not typically provide quarterly or annual guidance. However, any guidance relative to Boots & Coots' financial goals, and changes to or affirmations of guidance, will be provided through public disclosure, such as media releases or conference calls open to the public.
6. We will not comment one way or the other on individual earnings estimates or street consensus, including First Call or any other service.
7. We will continue to use the safe harbor guidelines for forward-looking information contained in the U.S. federal securities laws in conducting any communications with Designated Persons as part of individual, group and conference communications formats.

D. Analyst Reports and Models

We will not review or comment on analyst reports or models.

E. Quiet Period

Following the end of each quarter until the announcement of our financial results, we observe a "quiet period" during which we do not comment on Boots & Coots' operations, financial performance or financial outlook. We will notify the public of the timing of the quiet period by posting this information on our website.

F. Presentations

1. We will participate in securities firm-sponsored and other conferences selected by the Primary Spokesperson.
2. Primary Spokesperson will meet with individual Designated Persons and groups of Designated Persons. We also will participate in public presentations at which Designated Persons could be present, including industry seminars, trade shows and employee meetings.
3. We do not intend to disclose any material, non-public information during these conferences, meetings and presentations. However, if material, non-public information is disclosed, we will comply with Regulation FD.

III. Modifications and Amendments

Boots & Coots reserves the right to modify and/or amend this Policy at any time.