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3rd February 2010

To : Director and Manager of the Stock Exchange of Thailand

Subject : 4th Quarter of 2009 Management Discussion and Analysis (MD&A)

THE RESULTS in Thai Baht, audited by Ernst & Young, as well as US Dollars, certified by Baker Tilly, show you the latest financial position of the Company. The net profit before tax for Q4 2009 was USD 13.43 million. The earnings per day per ship during Q4 came in at USD 12,282, on the lower side of our forecast for this year of USD 14,000 per day per ship. In this quarter, daily operating costs were USD 4,717, which has taken the annual costs to USD 5,040 per day per ship, slightly above our anticipated figure of USD 4,850. The EBITDA was USD 12.34 million during Q4 2009. The earnings per share (eps) in Thai Baht stood at Baht 0.40 per share for this quarter. To put our annual profit for 2009 of USD 88.09 million into perspective, we need only have a look at the many shipping companies that have posted massive losses, in some cases over a Billion USD, for this year.

THE HARD FACTS	2009	2008	Q4 2009	Q4 2008
Highest Earnings per day per ship in USD	33,250	48,450	23,750	27,835
Average Earnings per day per ship in USD	13,459	16,489	12,282	16,325
Operating cost per day per ship in USD	5,040	4,804	4,717	4,897
EBITDA in million USD (excluding gain on sale of vessels)	86.04	167.10	12.34	40.84
Net Profit/(Loss) in million USD (including exchange Gain (loss)) before Income Tax	89.38	148.78	13.43	35.02
Net Profit/(Loss) in million USD	88.09	148.14	13.37	34.69
Earnings Per Share in Thai Baht	2.93	4.75	0.40	1.18

AWARDS AND ACCOLADES: The year has been crowned with the December 2009/January 2010 issue of Asiamoney, under their Corporate Governance Poll, conferring the title of Best Overall for Corporate Governance, Best for Disclosure and Transparency and Best for Investor Relations in Thailand to our Company! The same issue also conferred on our Managing Director the title of Best Investor Relations Officer in Thailand for the second year in a row.

PROSPECTS: Apparent total Steel consumption was 1,207.013 MMT in 2008. This is estimated to drop to 1,103.735 MMT in 2009 and is forecast to reach 1,205.585 MMT in 2010 according to the World Steel Association. According to the Japan Iron & Steel Federation, Japan's crude steel output in the first eleven months totaled 78.58 MMT, compared with 111.26 MMT in the same period last year, representing a massive decline of 29% year-on-year. Japan is the second largest Steel producer in the world after China.

In terms of ships, as of 1st January 2008 a total of 411.92 million DWT existed and had increased to 438.2 million DWT as of 1st January 2009. This has jumped to 478.68 million DWT as of 1st January 2010 and is forecast to reach 607.41 million DWT by 1st January 2011 assuming no scrapping of older ships and 100% delivery of new ships on order. Even if we were to take a 50% slippage in the order book for 2010, we would still arrive at a number of 543 million DWT as of 1st January 2011 for an increase of 31.82% or an annual simple increase of 10.6% in each of the years 2008, 2009 and 2010. According to Pareto Securities AS, as of the end of 2009 about 5.1% of the global dry bulk fleet was tied up in congestion, which compares to the range of 2-7% in the period 2006 to date.

So there you have it, whilst apparent Steel consumption is forecast to stay flat between 2008 and 2010, the global dry cargo fleet would have increased by almost 32%. This is a rather simplistic view of the future demand/supply balance without looking at factors like congestion and/or under utilization of the world fleet and/or ton/mile growth, but whichever way you look at this situation, it still comes out looking like bad news for 2010 in terms of dry cargo prospects.

LONG TERM VERSUS SHORT TERM CHARTERS: The long term charters already booked as of 31st December 2009 are shown in the chart below.

Year	2009	2010	2011	2012	2013
Total Available Days	11,968	8,988	10,811	13,093	15,336
Fixed T/C Days	9,843	5,651	3,727	3,929	3,984
%age Fixed T/C Days	82.25%	62.87%	34.47%	30.01%	25.98%
Av. T/C Rate/Day in USD	14,397	11,829	15,021	15,781	15,868
Contract value in USD	\$141.7m	\$66.8m	\$56.0m	\$62.0m	\$63.2m

As can be seen, our forward four year (2010 to 2013) rolling book is currently at the 38.33% of capacity level with a visible revenue stream of USD 248 million. When freight rates move in an upward direction, as the BDI had done till the end of May 2008, we effectively locked in rates by putting away the spot ships for longer term charters at

healthy rates. This policy was very successfully employed over the last few years and allowed us to ride out the volatile nature of the spot market with relative ease. Now that the BDI has plunged to almost all time lows, and then recovered such that the market is more confused than ever before, we will have to wait out the current uncertain period before redeploying this strategy in the future when the BDI starts to clearly move in an upward direction. Till such time you should expect the strength of our forward 4 year rolling book to continue to decline. The current figures in the above table do not assume any further sales (see the next paragraph) of any of our existing ships nor any purchases as replacements for the sold ships other than the Rojarek Naree (29,870 DWT built in 2005 in Japan purchased for USD 22.15 million and already fixed for min 12 months to max 28 months with an EBITDA realization of USD 3.28 to 7.0 million respectively) that joined our fleet on the 21st December 2009 and the 18 brand new ships that we have already contracted at ABG. It also includes the 3 firm brand new Cement Carriers on long term charters to one of our existing clients that we had earlier announced.

The Fleet Rejuvenation Plan of replacing the aging ships from our current fleet with younger, better geared, economical and larger units from the second-hand market has progressed well with the sale of 21 ships. We still have another 4 older ships to sell which should be completed by the end of Q1 2010. The rejuvenation plan has the best chance of success under the existing financially stressed conditions. This is the opportunity that we had been patiently waiting for, and which, if implemented successfully, would ensure the long term profitability of the Company over the next 2 to 3 decades. We have secured credit lines of USD 500 million from our existing Lenders, and some new ones, to be able to execute this plan without stressing our balance sheet or shareholders in any way. We have started the replacement program with the purchase of the Rojarek Naree (see paragraph above) and should the price of similar ships remain at this or lower levels, then we would add 24 more ships to our fleet. We will report to you in our next news letter the progress that has been made in this matter.

THE CHINA FACTOR continues to have a disproportionate impact on the dry bulk markets. Chinese Coal imports for the first nine months grew to 86.16 MMT, an increase of 165% from 32.50 MMT imported in the same period last year. The Baltic Exchange reported in November 2009 that 180 Cape size bulkers were queuing to unload off Chinese ports – that’s about 20% of the world fleet. Domestic iron ore production has also grown hugely - by more than 36%. China’s banking regulators plan to slow down new lending to between 7 trillion Yuan (USD 1 trillion) and 8 trillion Yuan in 2010. The China Banking Regulatory Commission’s recommended range compares with 8.9 trillion Yuan of new local-currency loans in the first ten months of 2009. China is trying to ensure credit flow is enough to support an economic recovery while limiting the risk of

2009's lending boom leading to asset bubbles and bad loans. China's USD 586 billion stimulus package has boosted steel demand from property developers and automakers and as a result, steel output in China will hit a record high in 2009. According to the National Bureau of Statistics, China is estimated to have produced 566 MMT of Steel in 2009, up by almost 14% from the previous year.

The next SET Opportunity Day where PSL will be presenting will be held at the SET building at 0900 hours on Monday the 22nd February 2010. This event is normally very well attended with between 70 and 100 participants from the analysts, fund management and investor communities. We hope that many of you will attend this event where the Company will get a chance to thoroughly discuss the 2009 results and the prospects for 2010.

SHIP SCRAPPING has slowed down significantly as this year has progressed. In Q4 2009, 51 ships were scrapped whilst a total of 65 ships were added resulting in a net increase in the world fleet by 14 ships in our sector. For the whole of the year 2009, there has been a reduction of 2.9% in the world fleet in our sector from 3,219 ships at the beginning to 3,126 at the end of the year. If the freight markets continue at their current low, but volatile levels, we expect the world fleet in our sector to shrink by roughly 3 to 5% per annum in the next few years. This will help redress the current imbalance between supply and demand and allow for the spot market rates to rise in a couple of years.

Sincerely,

Khushroo Kali Wadia
Director