China Precision Steel, Inc.
Form 10-Q
May 17, 2010

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM 10–Q
(Mark One)

x QUARTERLY REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the quarterly period ended: March 31, 2010

o TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from ____________ to _____________

Commission File Number: 000-23039

CHINA PRECISION STEEL, INC.
(Exact Name of Registrant as Specified in Its Charter)

Delaware	14-1623047
(State or other jurisdiction of incorporation or organization)	(I.R.S. Employer Identification No.)

18th Floor, Teda Building
87 Wing Lok Street, Sheungwan, Hong Kong
People's Republic of China
(Address of principal executive offices, Zip Code)

852-2543-2290
(Registrant's telephone number, including area code)

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days. Yes x No o

Indicate by check mark whether the registrant has submitted electronically and posted on its corporate Web site, if any, every Interactive Data File required to be submitted and posted pursuant to Rule 405 of Regulation S-T (232.405 of this chapter) during the preceding 12 months (or for such shorter period that the registrant was required to submit and post such files). Yes oNo o

Indicate by check mark whether the registrant is a large accelerated filer, an accelerated filer, a non-accelerated filer, or a smaller reporting company. See the definitions of "large accelerated filer," "accelerated filer" and "smaller reporting company" in Rule 12b-2 of the Exchange Act.

Large accelerated filer o	Accelerated filer o
Non-accelerated filer o(Do not check if a smaller reporting company)	Smaller reporting company x

Indicate by check mark whether the registrant is a shell company (as defined in Rule 12b-2 of the Exchange Act).
Yes o No x

The number of shares outstanding of each of the issuer's classes of common stock, as of May 14, 2010 is as follows:

Class of Securities	Shares Outstanding
Common Stock, $0.001 par value	46,562,955

CHINA PRECISION STEEL, INC.

Quarterly Report on FORM 10-Q
Three and Nine Months Ended March 31, 2010

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FINANCIAL INFORMATION

ITEM 1. FINANCIAL STATEMENTS.

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FOR THE THREE AND NINE MONTHS ENDED MARCH 31, 2010 AND 2009

China Precision Steel, Inc. and Subsidiaries
Consolidated Balance Sheets

	Notes	(Unaudited) March 31, 2010	June 30, 2009
Assets			
Current assets			
Cash and cash equivalents		$ 12,734,971	$ 13,649,587
Accounts receivable			
Trade, net of allowances of $1,007,135 and $830,127 at March 31, 2010 and June 30, 2009, respectively	5	26,857,342	25,140,834
Bills receivable		114,271	6,131,143
Other		811,960	881,153
Inventories	6	32,431,034	16,275,070
Prepaid expenses		274,153	75,917
Advances to suppliers, net of allowance of $1,632,705 and $1,631,557 at March 31, 2010 and June 30, 2009, respectively	7	18,846,246	21,878,047
Total current assets		92,069,977	84,031,751
Property, plant and equipment			
Property, plant and equipment, net	8	71,409,799	46,812,484
Deposits for building, plant and machinery		-	8,348,496
Construction-in-progress	9	5,661,802	22,245,173
		77,071,601	77,406,153
Intangible assets, net	10	1,841,986	1,871,211
Goodwill		99,999	99,999
Total assets		$ 171,083,563	$ 163,409,114
Liabilities and Stockholders' Equity			
Current liabilities			
Short-term loans	11	$ 25,796,145	$ 22,489,031
Accounts payable and accrued liabilities		5,887,906	7,144,242
Advances from customers	12	6,989,121	1,742,944
Other taxes payables		2,096,594	6,650,668
Current income taxes payable		5,300,626	4,778,767
Total current liabilities		46,070,392	42,805,652
Stockholders' equity:			
Preferred stock: $0.001 per value, 8,000,000 shares			

authorized, no shares outstanding at March 31, 2010 and June 30, 2009, respectively	13		
Common stock: $0.001 par value, 62,000,000 shares authorized, 46,562,955 and 46,562,955 issued and outstanding at March 31, 2010 and June 30, 2009, respectively	13	46,563	46,563
Additional paid-in capital	13	75,642,383	75,642,383
Accumulated other comprehensive income		9,815,614	9,731,505
Retained earnings		39,508,611	35,183,011
Total stockholders' equity		125,013,171	120,603,462
Total liabilities and stockholders' equity		$ 171,083,563	$ 163,409,114

The accompanying notes are an integral part of these consolidated financial statements.

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China Precision Steel, Inc. and Subsidiaries
Consolidated Statements of Operations
For the Three and Nine Months Ended March 31, 2010 and 2009
(Unaudited)

	Notes	Three Months Ended March 31, 2010	Three Months Ended March 31, 2009	Nine Months Ended March 31, 2010	Nine Months Ended March 31, 2009
Sales revenues		$ 29,990,596	$ 7,623,209	$ 74,046,423	$ 50,547,587
Cost of goods sold		26,560,721	9,605,252	66,277,234	45,125,635
Gross profit/(loss)		3,429,875	(1,982,043)	7,769,189	5,421,952
Operating expenses					
Selling expenses		124,589	298,492	227,003	1,632,322
Administrative expenses		773,102	541,251	2,005,841	1,581,456
Allowance for bad and doubtful debts		16	672	218,200	3,830,134
Depreciation and amortization expense		37,857	33,624	118,350	93,145
Total operating expenses		935,564	874,039	2,569,394	7,137,057
Income/(loss) from operations		2,494,311	(2,856,082)	5,199,795	(1,715,105)
Other income/(expense)					
Other revenues		9,790	76,556	120,753	336,257
Interest and finance costs		(171,928)	(257,123)	(675,362)	(905,305)
Total other (expense)		(162,138)	(180,567)	(554,609)	(569,048)
Income/(loss) from operations before income tax		2,332,173	(3,036,649)	4,645,186	(2,284,153)
Provision for income tax	15				
Current		320,819	481,804	319,586	333,547
Deferred		-	-	-	-
Total income tax expense		320,819	481,804	319,586	333,547
Net income/(loss)		$ 2,011,354	$ (3,518,453)	$ 4,325,600	$ (2,617,700)
Basic earnings/(loss) per share		$ 0.04	$ (0.08)	$ 0.09	$ (0.06)
Basic weighted average shares outstanding		46,562,955	46,562,953	46,562,955	46,560,656
Diluted earnings/(loss) per share		$ 0.04	$ (0.08)	$ 0.09	$ (0.06)
Diluted weighted average shares outstanding		46,562,955	46,562,953	46,562,955	46,560,656

Components of comprehensive income/(loss):				
Net income/(loss)	$ 2,011,354	$ (3,518,453)	$ 4,325,600	$ (2,617,700)
Foreign currency translation adjustment	20,003	(366,181)	84,109	384,243
Comprehensive income/(loss)	$ 2,031,357	$ (3,884,634)	$ 4,409,709	$ (2,233,457)

The accompanying notes are an integral part of these consolidated financial statements.

China Precision Steel, Inc. and Subsidiaries
Consolidated Statements of Changes in Stockholders' Equity
For the Year Ended June 30, 2009 and the Nine Months Ended March 31, 2010

	Ordinary Shares Share	Ordinary Shares Amount	Additional Paid-in Capital	Accumulated Other Comprehensive Income	Retained Earnings	Total Stockholders' Equity
Balance at June 30, 2008	46,472,953	$ 46,473	$ 75,372,488	$ 9,295,658	$ 35,591,349	$ 120,305,968
Transfer agent adjustment	2	-	-	-	-	-
Exercise of warrants	90,000	90	269,895	-	-	269,985
Foreign currency translation adjustment	-	-	-	435,847	-	435,847
Net income	-	-	-	-	(408,338)	(408,338)
Balance at June 30, 2009	46,562,955	46,563	75,642,383	9,731,505	35,183,011	120,603,462
Foreign currency translation adjustment	-	-	-	84,109	-	84,109
Net income	-	-	-	-	4,325,600	4,325,600
Balance at March 31, 2010 (unaudited)	46,562,955	$ 46,563	$ 75,642,383	$ 9,815,614	$ 39,508,611	$ 125,013,171

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China Precision Steel, Inc. and Subsidiaries
Consolidated Statements of Cash Flows
For the Nine Months Ended March 31, 2010 and 2009
(Unaudited)

	2010	2009
Cash flows from operating activities		
Net income/(loss)	$ 4,325,600	$ (2, 617,700)
Adjustments to reconcile net income to net cash provided by operating activities		
Depreciation and amortization	3,850,697	2,746,541
Allowance for bad and doubtful debts	218,200	3,830,134
Inventory provision	42,537	-
Net changes in assets and liabilities:		
Accounts receivable, net	4,173,882	11,360,509
Inventories	(16,187,073)	(4,732,832)
Prepaid expenses	(198,228)	(73,753)
Advances to suppliers	3,047,186	7,642,844
Accounts payable and accrued expenses	(1,261,253)	(2,058,293)
Advances from customers	5,244,952	(3,433,313)
Other taxes payable	(3,062,421)	(458,015)
Current income taxes	518,499	(9,841)
Net cash provided by operating activities	712,578	12,196,281
Cash flows from investing activities		
Deposit for plant and machinery	-	(8,048,466)
Purchase of land use rights	-	(786,643)
Purchase of property, plant and equipment, including construction in progress	(4,927,077)	(16,654,654)
Net cash (used in) investing activities	(4,927,077)	(25,489,763)
Cash flows from financing activities		
Exercise of common stock warrants	-	269,985
Short-term loan proceeds	3,735,771	-
Repayments of short-term loans	(444,471)	(87,801)
Net cash provided by financing activities	3,291,300	182,184
Effect of exchange rate	8,583	112,262
Net (decrease) in cash	(914,616)	(12,999,036)
Cash and cash equivalents, beginning of period	13,649,587	18,568,842
Cash and cash equivalents, end of period	$ 12,734,971	$ 5,569,806

The accompanying notes are an integral part of these consolidated financial statements.

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China Precision Steel, Inc. and Subsidiaries
Notes to the Consolidated Financial Statements
(Unaudited)

1. Description of Business

On December 28, 2006, China Precision Steel, Inc. (the "Company" or "we"), under our former name, OraLabs Holding Corp., issued 25,363,002 shares of common stock in exchange for 100% of the registered capital of Partner Success Holdings Limited ("PSHL"), a British Virgin Islands Business Company, pursuant to a Stock Exchange Agreement, dated March 31, 2006. Subsequent to the closing of that transaction, on December 28, 2006, the Company redeemed 3,629,350 shares of its common stock in exchange for all of the common stock of OraLabs, Inc., a wholly-owned operating subsidiary. The Company issued 100,000 shares of its common stock to OraLabs, Inc. in exchange for $450,690, and received additional cash payments in the aggregate amount of $108,107 in payment of an estimated $558,797 tax liability to be incurred by the Company in connection with the spinoff of OraLabs, Inc. and the supplemental payment received. The Company then changed its name to China Precision Steel, Inc.

These transactions were treated for financial reporting purposes as a recapitalization, with prior OraLabs, Inc. operating activities reflected on the statements of operations as income (loss) from discontinued operations. The $558,797 estimated tax liability incurred in connection with the spinoff of OraLabs, Inc. was treated as a transaction cost for financial reporting purposes and was treated as a reduction in additional paid in capital to the extent of the additional cash received which was also $558,797.

PSHL, registered on April 30, 2002 in the Territory of the British Virgin Islands, had registered capital of $50,000 as of March 31, 2010 and June 30, 2009. It has three wholly-owned subsidiaries, Shanghai Chengtong Precision Strip Company Limited ("Chengtong"), Shanghai Tuorong Precision Strip Company Limited ("Tuorong"), and Blessford International Limited ("Blessford International").

Chengtong was registered on July 2, 2002 in Shanghai, the People's Republic of China (the "PRC"), with a registered capital of $3,220,000 and a defined period of existence of 50 years from July 2, 2002 to July 1, 2052. Chengtong was classified as a Sino-foreign joint venture enterprise with limited liability. On August 22, 2005, the authorized registered capital of Chengtong was increased to $15,220,000 and on December 11, 2007, it was further increased to $42,440,000. Pursuant to a document issued by the District Council to Xuhang Town Council on June 28, 2004, the equity transfers from China Chengtong Metal Group Limited and Eastreal Holdings Company Limited to PSHL were approved and the transformation of Chengtong from a Sino-foreign joint investment enterprise to a wholly foreign owned enterprise (WFOE) was granted.

In the year ended June 30, 2007, we added three indirect subsidiaries to our corporate structure. On April 9, 2007, we purchased Tuorong through PSHL. The sole activity of Tuorong is the ownership of land use rights with respect to facilities utilized by Chengtong. On April 10, 2007, PSHL purchased the entire equity interest in Blessford International, a British Virgin Islands company, for a cash consideration of $100,000. Blessford International does not conduct any business, but it owns a single subsidiary, Shanghai Blessford Alloy Company Limited ("Shanghai Blessford"), that is a wholly-foreign owned enterprise with limited liability. Shanghai Blessford was registered on February 24, 2006 in Shanghai, the PRC, with a registered capital of $12,000,000 and a defined period of existence of 50 years from February 24, 2006 to February 23, 2056. On May 27, 2008, the authorized registered capital was increased to $22,000,000. We intend to hold Blessford International as a shell subsidiary. As used herein, the "Group" refers to the Company, PSHL, Chengtong, Tuorong, Blessford International and Shanghai Blessford on a consolidated basis.

The Company’s principal activities are conducted through its two operating subsidiaries, Chengtong and Shanghai Blessford. Chengtong and Shanghai Blessford are niche precision steel processing companies principally engaged in the manufacture and sale of cold-rolled and hot-rolled precision steel products and plates for downstream applications in the automobile industry (components and spare parts), kitchen tools and functional parts of electrical appliances. Raw materials, hot-rolled de-scaled (pickled) steel coils, will go through certain cold reduction processing procedures to give steel rolls and plates in different cuts and thickness for deliveries in accordance with customers’ specifications. Specialty precision steel offers specific control of thickness, shape, width, surface finish and other special quality features that compliment the emerging need for highly engineered end use applications. Precision steel pertains to the precision of measurements and tolerances of the above factors, especially thickness tolerance.

2. Basis of Preparation of Financial Statements

The financial statements have been prepared in order to present the consolidated financial position and consolidated results of operations in accordance with accounting principles generally accepted in the United States of America ("US GAAP") and are expressed in terms of US dollars ("USD") (see Note 3 "Foreign Currencies" below).

The accompanying unaudited consolidated financial statements as of March 31, 2010 and June 30, 2009 and for the periods ended March 31, 2010 and 2009 have been prepared in accordance with US GAAP and with the instructions to Form 10-Q and Regulation S-X applicable to smaller reporting companies. In the opinion of management, these unaudited consolidated financial statements include all adjustments considered necessary to make the financial statements not misleading. The results of operations for the nine months ended March 31, 2010 are not necessarily indicative of the results to be expected for the full year ending June 30, 2010.

3. Summary of Significant Accounting Policies

The following is a summary of significant accounting policies:

Accounting Standards Codifications - In June 2009, the Financial Accounting Standards Board ("FASB") issued Accounting Standards Codifications ("ASC") 105 "Generally Accepted Accounting Principles". This section designates ASC as the source of authoritative U.S. GAAP. ASC 105 is effective for interim or fiscal periods ending after September 15, 2009. We have used the new guidelines and numbering system when referring to GAAP in our quarter ended March 31, 2010. The adoption of ASC 105 did not have a material impact on our financial position, results of operation or cash flows.

Cash and Cash Equivalents - The Company considers all highly liquid debt instruments purchased with a maturity period of three months or less to be cash equivalents. The carrying amounts reported in the accompanying consolidated balance sheets for cash and cash equivalents approximate their fair value.

Accounts Receivable – Credit periods vary substantially across industries, segments, types and size of companies in the PRC where we operate our business. Because of the niche products that we process, our customers are usually also niche players in their own respective segment, who then sell their products to end product manufacturers. The business cycle is relatively long, as well as the credit periods. The Company offers credit to its customers for periods of 60 days, 90 days, 120 days and 180 days. We generally offer longer credit terms to long-standing recurring customers with good payment histories and sizable operations. Accounts receivable are recorded at the time revenue is recognized and is stated net of allowance for doubtful accounts.

Allowance for Doubtful Accounts - The Company maintains an allowance for doubtful accounts based on its assessment of the collectability of the accounts receivable. Management determines the collectability of outstanding accounts by maintaining regular communication with such customers and obtaining confirmation of their intent to fulfill their obligations to the Company. Management also considers past collection experience, our relationship with customers and the impact of current economic conditions on our industry and market. However, we note that the continuation or intensification of the current global economic crisis may have negative consequences on the business operations of our customers and adversely impact their ability to meet their financial obligations. To reserve for potentially uncollectible accounts receivable, management has made a 50% provision for all accounts receivable that are over 180 days past due and full provision for all accounts receivable over 1 year past due. From time to time, we will review these credit periods, along with our collection experience and the other factors discussed above, to evaluate the adequacy of our allowance for doubtful accounts, and to make changes to the allowance, if necessary. If our actual collection experience or other conditions change, revisions to our allowances may be required, including a further provision which could adversely affect our operating income, or write back of provision when estimated uncollectible accounts are actually collected. At March 31, 2010 and June 30, 2009, the Company had $1,007,135 and $830,127 of allowances for doubtful accounts, respectively.

Bad debts are written off for past due balances over two years or when it becomes known to management that such amount is uncollectible. Provision for bad debts recognized for the nine months ended March 31, 2010 and 2009 were $218,200 and $3,830,134, respectively. The current period charge reflects a provision for doubtful accounts based on our policy described above. Our management is continually working to ensure that any known uncollectible amounts are immediately written off as bad debt against outstanding balances.

Inventories - Inventories are stated at the lower of cost or market. Cost is determined using the weighted average method. Market value represents the estimated selling price in the ordinary course of business less the estimated costs necessary to complete the sale.

Cost of inventories comprises all costs of purchases, costs of conversion and other costs incurred in bringing the inventories to their present location and condition. Costs of conversion of inventories include fixed and variable production overheads, taking into account the stage of completion.

Intangible Assets and Amortization – Intangible assets represent land use rights in the PRC acquired by the Company and are stated at cost less amortization. Amortization of land-use rights is calculated on the straight-line method, based on the period over which the right is granted by the relevant authorities in the PRC.

Advances to Suppliers - In order to insure a steady supply of raw materials, the Company is required from time to time to make cash advances to its suppliers when placing purchase orders, for a guaranteed minimum delivery quantity at future times when raw materials are required. The advance is seen as a deposit to suppliers and guarantees our access to raw materials during periods of shortages and market volatility, and is therefore considered an important component of our operations. Contracted raw materials are priced at prevailing market rates agreed by us with the suppliers prior to each delivery date. Advances to suppliers are shown net of an allowance which represents potentially unrecoverable cash advances at each balance sheet date. Such allowances are based on an analysis of past raw materials receipt experience and the credibility of each supplier according to its size and background. In general, we don’t provide allowances against advances paid to those PRC state-owned companies as there is minimal risk of default. Our allowances for advances to suppliers are subjective critical estimates that have a direct impact on reported net earnings, and are reviewed quarterly at a minimum to reflect changes from our historic raw materials receipt experience and to ensure the appropriateness of the allowance in light of the circumstances present at the time of the review. It is reasonably possible that the Company’s estimate of the allowance will change, such as in the case when the Company becomes aware of a supplier’s inability to deliver the contracted raw materials or meet its financial obligations. As of March 31, 2010 and June 30, 2009, the Company had allowances of advances to suppliers of $1,632,705 and $1,631,557, respectively.

Allowances for advances to suppliers are written off when all efforts to collect the materials or recover the cash advances have been unsuccessful, or when it has become known to the management that there is no intention by the suppliers to deliver the contracted raw materials or refund the cash advances. To date, we have not written off any advances to suppliers.

Property, Plant and Equipment - Property, plant and equipment are stated at cost less accumulated depreciation. The cost of an asset comprises its purchase price and any directly attributable costs of bringing the asset to its present working condition and location for its intended use.

Depreciation is computed on a straight-line basis over the estimated useful lives of the related assets for financial reporting purposes. The estimated useful lives for significant property, plant and equipment are as follows:

Plant and machinery	10 years
Buildings	10 years
Motor vehicles	5 years
Office equipment	5 to 10 years

Repairs and maintenance costs are normally charged to the statement of operations in the year in which they are incurred. In situations where it can be clearly demonstrated that the expenditure has resulted in an increase in the future economic benefits expected to be obtained from the use of the asset, the expenditure is capitalized as an additional cost of the asset.

Impairment of Long-Lived Assets - The Company accounts for impairment of property, plant and equipment and amortizable intangible assets in accordance with ASC 360, which requires the Company to evaluate a long-lived asset for recoverability when there is an event or circumstance that indicates the carrying value of the asset may not be recoverable. An impairment loss is recognized when the carrying amount of a long-lived asset or asset group is not recoverable (when carrying amount exceeds the gross, undiscounted cash flows from use and disposition) and is measured as the excess of the carrying amount over the asset's (or asset group's) fair value.

Capitalized Interest - The Company capitalizes interest cost on borrowings incurred during the new construction or upgrade of qualified assets. Capitalized interest is added to the cost of the underlying assets and is amortized over the useful lives of the assets. During the nine months ended March 31, 2010 and 2009, the Company capitalized $395,004 and nil, respectively, of interest to construction-in-progress.

Construction-in-Progress - Plant and production lines currently under development are accounted for as construction-in-progress. Construction-in-progress is recorded at acquisition cost, including land use rights cost, development expenditure, professional fees and interest expenses capitalized during the course of construction for the purpose of financing the project. Upon completion and readiness for use of the project, the cost of construction-in-progress is to be transferred to property, plant and equipment.

Contingent Liabilities and Contingent Assets - A contingent liability is a possible obligation that arises from past events and whose existence will only be confirmed by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company. It can also be a present obligation arising from past events that is not recognized because it is not probable that outflow of economic resources will be required or the amount of obligation cannot be measured reliably.

A contingent liability is not recognized but is disclosed in the notes to the financial statements. When a change in the probability of an outflow occurs so that outflow is probable, the contingency is then recognized as a provision.

A contingent asset is a possible asset that arises from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain events not wholly within the control of the Company.

Contingent assets are not recognized but are disclosed in the notes to the financial statements when an inflow of economic benefits is probable. When inflow is virtually certain, an asset is recognized.

Advances from Customers - Advances from customers represent advance cash receipts from customers and for which goods have not been delivered or services have not been rendered at each balance sheet date. Advances from customers for goods to be delivered or services to be rendered in the subsequent period are carried forward as deferred revenue.

Revenue Recognition - Revenue from the sale of goods and services is recognized on the transfer of risks and rewards of ownership, which generally coincides with the time when the goods are delivered to customers and the title has passed and services have been rendered. Revenue is reported net of all VAT taxes. Other income is recognized when it is earned.

Functional Currency and Translating Financial Statements – The Company’s principal country of operations is the PRC. Our functional currency is Chinese Renminbi; however, the accompanying consolidated financial statements have been expressed in United States Dollars (“USD”). The consolidated balance sheets have been translated into USD at the exchange rates prevailing at each balance sheet date. The consolidated statements of operations and cash flows have been translated using the weighted-average exchange rates prevailing during the periods of each statement. The registered equity capital denominated in the functional currency is translated at the historical rate of exchange at the time of capital contribution. All translation adjustments resulting from the translation of the financial statements into the reporting currency are dealt with as other comprehensive income in stockholders’ equity.

Accumulated Other Comprehensive Income – Accumulated other comprehensive income represents the change in equity of the Company during the periods presented from foreign currency translation adjustments.

Taxation - Taxation on overseas profits has been calculated on the estimated assessable profits for the year at the rates of taxation prevailing in the country in which the Company operates.

United States

China Precision Steel, Inc. is subject to United States federal income tax at graduated rates up to 34%. No provision for current income taxes in the United States has been made as China Precision Steel, Inc. had no taxable income for the nine months ended March 31, 2010 and 2009.

BVI

PSHL and Blessford International were incorporated in the British Virgin Islands and, under the current laws of the British Virgin Islands, are not subject to income taxes.

PRC

Provision for the PRC enterprise income tax is calculated at the prevailing rate based on the estimated assessable profits less available tax relief for losses brought forward. The Company does not accrue United States' taxes on unremitted earnings from foreign operations as it is the Company's intention to invest these earnings in the foreign operations indefinitely.

Enterprise income tax

On March 16, 2007, the National People's Congress of China passed The Enterprise Income Tax Law (the "New EIT Law"), and on December 6, 2007, the State Council of China passed the Implementing Rules for the EIT Law ("Implementing Rules") which took effect on January 1, 2008. The New EIT Law and Implementing Rules impose a unified enterprise income tax ("EIT") of 25% on all domestic-invested enterprises and foreign invested entities ("FIEs"), unless they qualify under certain limited exceptions. Therefore, nearly all FIEs are subject to the new tax rate alongside other domestic businesses rather than benefiting from the old FIE tax laws, and its associated preferential tax treatments, beginning January 1, 2008.

Despite these changes, the EIT Law gives the FIEs established before March 16, 2007 ("Old FIEs") a five-year grandfather period during which they can continue to enjoy their existing preferential tax treatments, commonly referred to as "tax holidays", until these holidays expire. As Old FIEs, Chengtong's tax holiday of a 50% reduction in the 25% statutory rates had expired on December 31, 2008 and is currently subject to the 25% statutory rates since January 1, 2009; Shanghai Blessford's full tax exemption from the enterprise income tax has expired on December 31, 2009, and is adjusted to a 50% reduction for the three subsequent years expiring on December 31, 2012. Subsequent to the expiry of their tax holidays, Chengtong and Shanghai Blessford will be subject to enterprise income taxes at 25% or the then prevailing statutory rates. The discontinuation of any such special or preferential tax treatment or other incentives would have an adverse effect on any organization's business, fiscal condition and current operations in the PRC.

While current income tax in our consolidated financial statements is provided in accordance with US GAAP and based on income recognized for our financial year ending June 30, actual income tax payments are based on the assessment of taxable income by local tax authority in the PRC where our operating subsidiaries are located and their tax year ends December 31. In the case where the income tax assessed by the local tax authority is different from the amount we have provided in our consolidated financial statements, there will be an impact on our future operating results.

Deferred tax assets and liabilities are recognized for the future tax consequences attributable to differences between the financial statements carrying amounts of existing assets and liabilities and their respective tax bases. Deferred tax assets, including tax loss and credit carry forwards, and liabilities are measured using enacted tax rates expected to apply to taxable income in the years in which those temporary differences are expected to be recovered or settled. The effect on deferred tax assets and liabilities of a change in tax rates is recognized in income in the period that includes the enactment date. Deferred income tax expense represents the change during the period in the deferred tax assets and deferred tax liabilities. The components of the deferred tax assets and liabilities are individually classified as current and non-current based on their characteristics. Deferred tax assets are reduced by a valuation allowance when, in the opinion of management, it is more likely than not that some portion or all of the deferred tax assets will not be realized.

Effective January 1, 2007, the Company adopted the provisions of the ASC Topic No. 740 "Accounting for Income Taxes" and "Accounting for Uncertainty in Income Taxes – an interpretation of FASB Statement No. 109" ("ASC 740"). ASC 740 requires the recognition of tax benefits or expenses based on the estimated future tax effects of temporary differences between the financial statements and tax bases of its assets and liabilities. Deferred tax assets and liabilities primarily relate to tax basis differences on unrealized gains on corporate equities, stock-based compensation, amortization periods of certain intangible assets and differences between the financial statements and tax bases of assets acquired.

The Company recognizes that virtually all tax positions in the PRC are not free of some degree of uncertainty due to tax law and policy changes in the PRC. However, the Company cannot reasonably quantify political risk factors and thus must depend on guidance issued by current officials in the PRC.

Based on all known facts and circumstances and current tax law, the Company believes that the total amount of unrecognized tax benefits as of March 31, 2010 is not material to its results of operations, financial condition or cash flows. The Company also believes that the total amount of unrecognized tax benefits as of March 31, 2010, if recognized, would not have a material effect on its effective tax rate. The Company further believes that there are no tax positions for which it is reasonably possible, based on current Chinese tax law and policy, that the unrecognized tax benefits will significantly increase or decrease over the next 12 months producing, individually or in the aggregate, a material effect on the Company's results of operations, financial condition or cash flows.

Value added tax

The Provisional Regulations of the People's Republic of China Concerning Value Added Tax promulgated by the State Council came into effect on January 1, 1994. Under these regulations and the Implementing Rules of the Provisional Regulations of the People's Republic of China Concerning Value Added Tax, value added tax is imposed on goods sold in or imported into the PRC and on processing, repair and replacement services provided within the PRC.

Value added tax payable in the PRC is charged on an aggregated basis at a rate of 13% or 17% (depending on the type of goods involved) on the full price collected for the goods sold or, in the case of taxable services provided, at a rate of 17% on the charges for the taxable services provided, but excluding, in respect of both goods and services, any amount paid in respect of value added tax included in the price or charges, and less any deductible value added tax already paid by the taxpayer on purchases of goods and services in the same financial year.

The revised People's Republic of China Tentative Regulations on Value Added Tax became effective on January 1, 2009 with the issuance of Order of the State Council No. 538. With the implementation of this VAT reform, input VAT associated with the purchase of fixed assets is now deductible against output VAT.

Retirement Benefit Costs - According to the PRC pension regulations, Chengtong and Shanghai Blessford contribute to a defined contribution retirement scheme organized by the municipal government in the province in which Chengtong and Shanghai Blessford were registered and all qualified employees are eligible to participate in the scheme. Contributions to the scheme are calculated at 23.5% of the employees' salaries above a fixed threshold amount and the employees contribute 2% to 8%, while Chengtong and Shanghai Blessford contribute the remaining 15.5% to 21.5%. The Group has no other material obligation for the payment of retirement benefits beyond the annual contributions under this scheme.

For the nine months ended March 31, 2010 and 2009, the Company's pension cost charged to the statements of operations under the plan amounted to $128,273 and $83,273, respectively, all of which have been paid to the National Social Security Fund.

Fair Value of Financial Instruments - The carrying amounts of certain financial instruments, including cash, accounts receivable, other receivables, accounts payable, accrued expenses, and other payables approximate their fair values as at March 31, 2010 and June 30, 2009 because of the relatively short-term maturity of these instruments. For short-term loans, the carrying amount is assumed to approximate fair value based on the current rates at which the Group could borrow funds with similar remaining maturities.

Use of Estimates - The preparation of financial statements in accordance with generally accepted accounting principles requires management to make estimates and assumptions that affect reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

4. Concentrations of Business and Credit Risk

The Company's list of customers whose purchases from us were 10% or more of total sales during the nine months ended March 31, 2010 and 2009 is as follows:

Customers	2010	% to sales	2009	% to sales
Shanghai Changshuo Steel Company, Ltd	15,806,668	21	-*	-*
Shanghai Shengdejia Metal Products Co., Ltd	12,322,906	17	-*	-*
Salzgitter Mannesmann International GMBH	-*	-*	13,653,466	27

* Not 10% customers for the relevant periods

The Company's list of suppliers whose sales to us exceeded 10% of our total purchases during the nine months ended March 31, 2010 and 2009 is as follows:

Suppliers	2010	% to purchases	2009	% to purchases
Dachang Huizu Baosheng Steel Products Co., Ltd.	23,876,549	31	-*	-*
Wuxi Hangda Trading Co., Ltd.	13,515,717	18	-*	-*
Guangzhou Zhujiang Steel Co., Ltd.	10,265,428	14	-*	-*
BaoSteel Steel Products Trading Co. Ltd.	-*	-*	10,758,080	31
Shanghai Pinyun Steel Co., Ltd.	-*	-*	8,486,770	25

* Not 10% suppliers for the relevant periods

Our management continues to take appropriate actions to perform ongoing business and credit reviews of our customers to reduce our exposure to new and recurring customers who have been deemed to pose a high credit risk to our business based on their commercial credit reports, our collection history, and our perception of the risk posed by their geographic location. We have halted all our direct sales to customers located in the Philippines as we consider the associated credit risk to be relatively high. Based on publicly available reports, such as that issued by A.M. Best, there is a high risk that financial volatility may erupt in that country due to inadequate reporting standards, a weak banking system or asset markets and/or poor regulatory structure. We expect to resume such exports when conditions improve.

5. Accounts Receivable

The Company provides credit in the normal course of business. The Company performs ongoing credit evaluations of its domestic and international customers and clients and maintains allowances for bad and doubtful accounts based on factors surrounding the credit risk of specific customers and clients, historical trends, and other information. Trade accounts receivable, net totaled $26,857,342 and $25,140,834 as of March 31, 2010 and June 30, 2009, respectively.

From time to time, accounts receivable are reviewed for changes from the historic collection experience to ensure the appropriateness of the allowances. These estimates had been relatively accurate in the past and there was no need to revise such estimates. However, we will review such estimates more frequently when needed, and make revisions if necessary. The continuation or intensification of the current global economic crisis and turmoil in the global financial markets may have negative consequences for the business operations of our customers and adversely impact their ability to meet their obligations to us. A significant change in our collection experience, deterioration in the aging of receivables and collection difficulties could require that we increase our estimate of the allowance for doubtful accounts. Any such additional bad debt charges could materially and adversely affect our future operating results.

6. Inventories

The Company was required under GAAP to write down the value of its inventories to their net realizable values (average selling prices less reasonable costs to convert the inventories into completed form) in the amount of $42,537 for the nine months ended March 31, 2010.

As of March 31, 2010 and June 30, 2009, inventories consisted of the following:

At cost:	March 31, 2010	June 30, 2009
Raw materials	$ 12,971,109	$ 8,846,663
Work in progress	6,748,169	2,818,832

Finished goods		9,781,729		2,191,341
Consumable items		2,972,564		2,418,234
		32,473,571		16,275,070
Less: provision		(42,537)		-
	$	32,431,034	$	16,275,070

Costs of finished goods include direct labor, direct materials, and production overhead before the goods are ready for sale.

Consumable items represent parts used in our cold rolling mills and other equipment that need to be replaced from time to time when necessary to ensure optimal operating results, such as bearings and rollers.

Inventories amounting to $7,279,994 were pledged for short-term loans totaling $25,796,145 as of March 31, 2010.

7. Advances to Suppliers

Cash advances are shown net of allowances of $1,632,705 and $1,631,557 as of March 31, 2010 and June 30, 2009, respectively.

The majority of our advances to suppliers greater than 180 days as of March 31, 2010 is attributable to our advances to a single supplier, a subsidiary of a state-owned company in the PRC. We believe that advances paid to state-owned companies are ultimately collectible because they are backed by the full faith and credit of the PRC government. As such, we generally do not provide allowances against such advances.

8. Property, Plant and Equipment

Property, plant and equipment, stated at cost less accumulated depreciation, consisted of the following:

	March 31, 2010	June 30, 2009
Plant and machinery	$ 61,660,684	$ 33,331,681
Buildings	21,821,554	21,806,219
Motor vehicles	562,277	534,652
Office equipment	458,241	404,695
	84,502,756	56,077,247
Less: Accumulated depreciation	(13,092,957)	(9,264,763)
	$ 71,409,799	$ 46,812,484

Depreciation expense related to manufacturing is included as a component of cost of goods sold. During the three and nine months ended March 31, 2010, depreciation totaling $983,734 and $2,334,882, respectively, was included as a component of cost of goods sold (2009: $1,437,115and $3,021,547, respectively).

Plant and machinery and buildings amounting to $42,108,094 (June 30, 2009: $55,137,900) were pledged for short-term loans totaling $25,796,145 (June 30, 2009: $22,489,031).

9. Construction-In-Progress

As of March 31, 2010 and June 30, 2009, construction-in-progress consisted of the following:

	March 31, 2010	June 30, 2009
Construction costs	$ 5,661,802	$ 22,245,173

Construction-in-progress represents construction and installations of annealing furnaces and other cold rolling related equipment.

10. Intangible Assets

Land use rights amounting to $1,841,986 (June 30, 2009: $1,861,093) were pledged for short-term loans totaling $25,796,145 (June 30, 2009: $22,489,031).

The Company acquired land use rights in August 2004 and December 2006 that both expire in December 2056. The land use rights are amortized over a fifty-year term. An amortization amount of approximately $39,000 is to be recorded each year for the remaining lease period.

Amortizable intangible assets of the Company are reviewed when there are triggering events to determine whether their carrying value has become impaired, in conformity with ASC 360. The Company also re-evaluates the periods of amortization to determine whether subsequent events and circumstances warrant revised estimates of useful lives.

11. Short-Term Loans

Short-term loans consisted of the following:

		March 31, 2010	June 30, 2009
Bank loan agreement dated July 7, 2009, due July 31, 2010 with an interest rate of the Singapore Interbank Offered Rate ("SIBOR") plus 3% (3.19% at March 31, 2010) (Note 8)		5,300,000	5,300,000
Bank loan agreement dated July 7, 2009, due July 31, 2010 with an interest rate at 115% of the standard market rate set by the People's Bank of China for Renminbi loans (6.11% at March 31, 2010) (Note 8)		2,476,543	2,915,238
Bank loan agreement dated July 7, 2009, due July 31, 2010 with an interest rate at 115% of the standard market rate set by the People's Bank of China for Renminbi loans (6.11% at March 31, 2010) (Notes 6 and 8)		18,019,602	14,273,793
	$	25,796,145	$ 22,489,031

The above bank loans outstanding as at March 31, 2010 carry an interest rate of 1.15 times of the standard market rate set by the People's Bank of China for Renminbi loans and at SIBOR plus 3% for USD loans, due on July 31, 2010, and are secured by inventories, land use rights, buildings and plant and machinery, and guaranteed by PSHL and our Chairman, Mr. Wo Hing Li. In addition, pursuant to a bank loan agreement entered into between the Company and Raiffeisen Zentralbank sterreich AG ("RZB"), Mr. Li undertakes to maintain a shareholding percentage in the Company of not less than 33.4% unless otherwise agreed to with RZB.

The weighted-average interest rate on short-term loans as of March 31, 2010 and June 30, 2009 was 5.51% and 5.53%, respectively.

On January 29, 2010, Shanghai Blessford entered into a Senior Loan Agreement with DEG-Deutsche Investitions-Und Entwicklungsgesellschaft Mbh ("DEG") for a loan amount up to $18,000,000 at an annual interest rate of 4.5% above the six-month USD LIBOR rate. The loan is to be repaid semi-annually over five years starting on December 15, 2011 and is secured by a mortgage on the new cold rolling line and annealing furnaces at Shanghai Blessford's facilities. Shanghai Blessford is in the process of registering the asset mortgage and fulfilling other requirements by DEG as of March 31, 2010, and will draw down from this loan once these procedures are completed.

12. Advances from Customers

Advances from customers represent advance cash receipts from customers and for which goods have not been delivered or services have not been rendered at each balance sheet date. Advances from customers for goods to be delivered or services to be rendered in the subsequent period are carried forward as deferred revenue.

13. Equity

Pursuant to Section 5.1 of the Stock Purchase Agreement, the Company agreed to reserve for issuance to investors in the private placement an aggregate of 2,000,000 shares of Common Stock if the Company’s net income for the fiscal year ended June 30, 2007 was less than US$10.4 million, as set forth in the Company’s audited financial statements as filed with the SEC in the Company’s Annual Report on Form 10-K for that fiscal year. As the Company’s net income as set forth in its audited financial statements for the year ended June 30, 2007 was less than US$10.4 million, the Company was required to issue the 2,000,000 shares of Common Stock to such investors. Such issuance was effected on October 15, 2007. No additional consideration was received by the Company in connection with this issuance of shares of Common Stock.

In conjunction with the audit of the Group's financial statements for the year ended June 30, 2007, certain post-closing adjustments were made for Tuorong. In light of such adjustments and consistent with the purposes and intentions of the Debt Reduction Agreement, dated February 13, 2007, as amended on February 20, 2007, it was determined that 771,060 shares of the Company's Common Stock issued to directors pursuant to the Debt Reduction Agreement would be required to be cancelled in order to eliminate the $2,590,763 reflected on the June 30, 2007 audited financial statements as amounts due from directors. Such cancellation was effected on November 8, 2007.

Pursuant to the Subscription Agreement dated November 1, 2007 (the "Subscription Agreement"), on November 6, 2007, the Company agreed to issue and sell in a registered direct offering (the "Offering") an aggregate of 7,100,000 shares of its common stock at a price of $6.75 per share (the "Purchase Price") and an aggregate of 1,420,000 warrants to purchase shares of its Common Stock ("Warrants" and, together with the Common Stock, the "Securities"). The Warrants have an exercise price of $8.45 per share. The Warrants were not to be exercised prior to May 6, 2008. The Securities are registered under the Securities Act of 1933, as amended (the "Act"), pursuant to the Company's existing effective shelf Registration Statement on Form S-3. In connection with the offer and sale of the Securities, the Company filed on November 1, 2007, a Registration Statement on Form S-3 pursuant to Rule 462(b) promulgated under the Act to register an additional $10 million of its securities relating to its shelf Registration Statement.

The Company closed the Offering on November 6, 2007 (the "Closing Date"). The net proceeds of the offering were approximately $44 million, after deducting underwriting commissions and discounts and other fees and expenses relating to the offering. The warrants were valued at $5.3 million and the net proceeds were recorded to additional paid-in capital. The intended usage of the net proceeds was for repayment of certain bank debt, capital expenditure, and general corporate purposes. During the year ended June 30, 2008, long-term bank loans of $13,042,159 were paid off, and a progress payment of $7,016,729 was made in relation to the construction of the third cold rolling mill. During the year ended June 30, 2009, we invested an additional $13,423,016 in construction in progress and property, production plants and equipment in relation to the third cold rolling mill and expansion of the Shanghai Blessford production facilities.

On the Closing Date, pursuant to a Placement Agency Agreement entered into between the Company and Roth Capital Partners LLC on October 31, 2007, Roth Capital received an amount in cash equal to 7.0% of the gross proceeds of the Offering and warrants to purchase an amount of Common Stock equal to 3.0% of the total number of shares of Common Stock sold in the Offering (the "Placement Warrants"), or 225,600 shares of Common Stock valued at $887,504, and this amount was recorded as syndication fees offsetting additional paid-in capital. Such Placement Warrants have an exercise price per share of 120% of the closing price per share of the Company's Common Stock on the Closing Date, or $7.38, and were not exercisable prior to May 6, 2008. Thereafter, the Placement Warrants are exercisable at any time until the third anniversary of the date of issue.

14. Stock Warrants

In connection with a Stock Purchase Agreement dated February 16, 2007 for the Company's private placement offerings (the "Private Placement"), on February 22, 2007, the Company issued warrants to the placement agents to purchase an aggregate of 1,300,059 shares of Common Stock as partial compensation for services rendered in connection with the Private Placement valued at $2,770,349. The value of the warrants was considered syndication fees and was recorded to additional paid-in capital. 851,667 of these warrants have been exercised during the year ended June 30, 2008.

On February 22, 2007, the Company issued warrants to purchase up to 100,000 shares of Common Stock to the Company's then investor relations consultants valued at $447,993. The value of these was considered syndication fees in association with the Private Placement and was recorded to additional paid-in capital. These warrants were not exercised and expired on February 22, 2010.

On November 6, 2007, in connection with the Subscription Agreement, the Company issued to certain institutional accredited investors warrants to purchase 1,420,000 shares of Common Stock valued at $5,374,748, and Roth Capital Partners, LLC, as placement agent, received warrants to purchase 225,600 shares of Common Stock valued at $887,504. These amounts were recorded as syndication fees offsetting additional paid-in capital.

Information with respect to stock warrants outstanding is as follows:

Exercise Price	Outstanding June 30, 2009	Granted	Expired or Exercised	Outstanding March 31, 2010	Expiration Date
$ 7.38	225,600	-0-	-0-	225,600	November 5, 2010
$ 3.00	358,392	-0-	-0-	358,392	February 22, 2011
$ 8.45	1,420,000	-0-	-0-	1,420,000	May 5, 2013

15. Income Taxes

For PRC enterprise income tax reporting purposes, the Company is required to compute a 10% salvage value when computing depreciation expense and add back the allowance for doubtful debts. For financial reporting purposes, the Company does not take into account a 10% salvage value when computing depreciation expenses.

The tax holiday resulted in tax savings as follows:

	Nine months ended March 31, 2010	2009
Tax savings	$ 855,583	$ (223,567)
Benefit per share		
Basic	$ 0.02	$ (0.005)
Diluted	$ 0.02	$ (0.005)

Significant components of the Group's deferred tax assets as of March 31, 2010 and June 30, 2009 are as follows:

Deferred tax assets:	March 31, 2010	June 30, 2009
Net operating loss carried forward	$ 1,854,914	$ 1,823,487
Temporary differences resulting from allowances	1,906,041	1,850,921
Total deferred income tax assets	3,760,955	3,674,408
Valuation Allowance	(3,760,955)	(3,674,408)
	$ —	$ —

The Company has not recognized a deferred tax liability in respect of the undistributed earnings of its foreign subsidiaries of approximately $16,685,318 as of March 31, 2010 because the Company currently plans to reinvest those unremitted earnings such that the remittance of the undistributed earnings of those foreign subsidiaries to the Company will be postponed indefinitely. A deferred tax liability will be recognized when the Company no longer plans to permanently reinvest undistributed earnings.

A reconciliation of the provision for income taxes with amounts determined by the U.S. federal income tax rate to income tax expense per books is as follows.

	Nine months ended March 31, 2010	2009
Computed tax expense/(benefit) at the federal statutory rate of 34%	$ 1,579,764	$ (776,613)
Adjustments for PRC entities taxed at different rates	(488,298)	141,784
Valuation allowance	88,481	1,191,943

Income not subject to tax	(3,545)	-
Overprovision in prior year	(1,233)	-
Benefit of tax holiday	(855,583)	(223,567)
Income tax expense per books	$ 319,586	$ 333,547

Income tax expense consists of:

	Nine months ended March 31,	
	2010	2009
Income tax expense for the year – PRC	$ 319,586	$ 333,547
Deferred income tax benefit – PRC	-	-
Income tax expense per books	$ 319,586	$ 333,547

16. Earnings/(loss) Per Share

ASC 260-10 requires a reconciliation of the numerator and denominator of the basic and diluted earnings/(loss) per share (EPS) computations.

For the three and nine months ended March 31, 2010, warrants to purchase 358,392 shares of common stock at an exercise price of $3.00; 1,420,000 shares at an exercise price of $8.45 and 225,600 shares at an exercise price of $7.38 were not included as their effect would have been anti-dilutive, however, these securities could potentially dilute basic earnings per share in the future.

For the three and nine months ended March 31, 2009, dilutive shares include outstanding warrants to purchase 358,392 shares of common stock at an exercise price of $3.00 and warrants to purchase 100,000 shares at an exercise price of $3.60; 1,420,000 shares at an exercise price of $8.45 and 225,600 shares at an exercise price of $7.38 were not included as their effect would have been anti-dilutive, however, these securities could potentially dilute basic earnings per share in the future.

The following reconciles the components of the EPS computation:

	Income/(loss) (Numerator)	Shares (Denominator)	Per Share Amount
For the three months ended March 31, 2010:			
Net income	$ 2,011,354		
Basic EPS income available to common shareholders	$ 2,011,354	46,562,955	$ 0.04
Effect of dilutive securities:		-	
Diluted EPS income available to common shareholders	$ 2,011,354	46,562,955	$ 0.04
For the three months ended March 31, 2009:			
Net loss	$ (3,518,453)		
Basic EPS (loss) available to common shareholders	$ (3,518,453)	46,562,953	$ (0.08)
Effect of dilutive securities:		-	
Diluted EPS (loss) available to common shareholders	$ (3,518,453)	46,562,953	$ (0.08)

	Income/(loss) (Numerator)	Shares (Denominator)	Per Share Amount
For the nine months ended March 31, 2010:			
Net income	$ 4,325,600		
Basic EPS income available to common shareholders	$ 4,325,600	46,562,955	$ 0.09
Effect of dilutive securities:		-	
Diluted EPS income available to common shareholders	$ 4,325,600	46,562,955	$ 0.09
For the nine months ended March 31, 2009:			
Net loss	$ (2,617,700)		
Basic EPS (loss) available to common shareholders	$ (2,617,700)	46,560,656	$ (0.06)

Effect of dilutive securities:			-		
Diluted EPS (loss) available to common shareholders	$	(2,617,700)	46,560,656	$	(0.06)

17. Capital Commitments

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As of March 31, 2010, the Company had contractual commitments of $916,216 (June 30, 2009: $2,496,669) for the construction of a cold rolling mill.

18. Impairment

We determine impairment of long-lived assets, including property, plant and equipment and amortizable intangible assets, by measuring the estimated undiscounted future cash flows generated by these assets, comparing the result to the assets' carrying values and adjust the assets to the lower of its carrying value or fair value and charging current operations for the measured impairment. The determination of the undiscounted future cash flows and fair value of these assets are subject to significant judgment.

The recent decline in market cap and stock price has triggered an impairment test under ASC 360 for the quarter ended March 31, 2010 and no impairment charges were recognized for the relevant period. As of March 31, 2010, the Company expects these assets to be fully recoverable based on the result of the impairment test. Goodwill amounting to $99,999 as at March 31, 2010 was considered immaterial and not tested for impairment in accordance with ASC 350.

19. Impact of Recent Accounting Pronouncements

In December 2007, the FASB issued guidance now codified as FASB ASC 805, "Business Combinations" ("ASC 805"). ASC 805 will change the accounting for business combinations. Under ASC 805, an acquiring entity will be required to recognize all the assets acquired and liabilities assumed in a transaction at the acquisition-date fair value with limited exceptions. ASC 805 will change the accounting treatment and disclosure for certain specific items in a business combination. ASC 805 applies prospectively to business combinations for which the acquisition date is on or after the beginning of the first annual reporting period beginning on or after December 15, 2008. ASC 805 will impact the Company in the event of any future acquisition.

In December 2007, the FASB issued guidance now codified as ASC 810, "Non-controlling Interests in Consolidated Financial Statements - an amendment of Accounting Research Bulletin No. 51". ASC 810 establishes new accounting and reporting standards for the noncontrolling interest in a subsidiary and for the deconsolidation of a subsidiary. ASC 810 is effective for fiscal years beginning on or after December 15, 2008. The Company does not believe that ASC 810 will have a material impact on its consolidated financial statements.

In April 2008, the FASB issued guidance now codified as ASC 350-30, "Determination of the Useful Life of Intangible Assets" ("ASC 350-30"), which amends the factors that should be considered in developing renewal or extension assumptions used to determine the useful life of a recognized intangible asset under ASC 350, "Goodwill and Other Intangible Assets" ("ASC 350"). The intent of this guidance is to improve the consistency between the useful life of a recognized intangible asset under ASC 350 and the period of expected cash flows used to measure the fair value of the asset under ASC 805, "Business Combinations," and other U.S. generally accepted accounting principles. This guidance is effective for fiscal years beginning after December 15, 2008 (the Company's fiscal year 2010), and interim periods within those fiscal years. The Company does not believe the adoption of ASC 350-30 will have a material impact on the Company's consolidated financial position, results of operations and cash flows.

In May 2008, the FASB issued guidance now codified as ASC 944-20, "Accounting for Financial Guarantee Insurance Contracts" ("ASC 944-20"). The new standard clarifies how FASB Statement No. 60, now codified as ASC 944-20, "Accounting and Reporting by Insurance Enterprises", applies to financial guarantee insurance contracts issued by insurance enterprises, including the recognition and measurement of premium revenue and claim liabilities. It also requires expanded disclosures about financial guarantee insurance contracts. ASC 944-20 is effective for financial statements issued for fiscal years beginning after December 15, 2008, and all interim periods within those fiscal years, except for disclosures about the insurance enterprise's risk-management activities, which are effective the first period (including interim periods) beginning after May 23, 2008. Except for the required disclosures, earlier application is not permitted. The standard is not applicable to this Company.

In October 2008, the FASB issued guidance now codified as ASC 820-10, “Determining the Fair Value of a Financial Asset When the Market for That Asset Is Not Active” (“ASC 820-10”). This guidance clarifies the application of FASB Statement No. 157, now codified as ASC 820-10, “Fair Value Measurements”, in a market that is not active and provides an example to illustrate key considerations in determining the fair value of a financial asset when the market for that financial asset is not active. ASC 820-10 was effective upon issuance. The adoption of ASC 820-10 will not impact our consolidated financial statements in any material respect.

In December 2008, the FASB issued guidance now codified as ASC 715-20-65, “Employers’ Disclosures about Postretirement Benefit Plan Assets, an amendment of FASB Statement No. 132” (revised 2003), now codified as ASC 715-20-65. It provides guidance on an employer’s disclosures about plan assets, including: how investment allocation decisions are made and factors that are pertinent to an understanding of investment policies and strategies; the major categories of plan assets; the inputs and valuation techniques used to measure the fair value of plan assets; the effect of fair value measurements using significant unobservable inputs (level 3) on changes in plan assets for the period, and significant concentrations of risks within plan assets. ASC 715-20-65 is effective for fiscal years ending after December 15, 2009. We are currently assessing the potential impact that adoption of this standard may have on our financial statements.

In April 2009, the FASB issued guidance now codified as ASC 825, "Interim Disclosures about Fair Value of Financial Instruments". It requires the fair value for all financial instruments within the scope of SFAS No. 107, now codified as ASC 825, "Disclosures about Fair Value of Financial Instruments", to be disclosed in the interim periods as well as in annual financial statements. This standard is effective for the quarter ending after June 15, 2009. The adoption of ASC 825 will not impact our consolidated financial statements in any material respect.

In April 2009, the FASB issued guidance now codified as ASC 820-10, "Determining Fair Value When the Volume and Level of Activity for the Asset or Liability Have Significantly Decreased and Identifying Transactions That Are Not Orderly". It clarifies the objective and method of fair value measurement even when there has been a significant decrease in market activity for the asset being measured. This standard is effective for the quarter ending after June 15, 2009. The adoption of ASC 825 will not impact our consolidated financial statements in any material respect.

In April 2009, the FASB issued guidance now codified as ASC 320, "Recognition and Presentation of Other-Than-Temporary Impairments". The objective of an other-than-temporary impairment analysis under existing U.S. GAAP is to determine whether the holder of an investment in a debt or equity security for which changes in fair value are not regularly recognized in earnings (such as securities classified as held-to-maturity or available-for-sale) should recognize a loss in earnings when the investment is impaired. An investment is impaired if the fair value of the investment is less than its amortized cost basis. This guidance amends the other-than-temporary impairment guidance in U.S. GAAP for debt securities to make the guidance more operational and to improve the presentation and disclosure of other-than-temporary impairments on debt and equity securities in the financial statements. This guidance does not amend existing recognition and measurement guidance related to other-than-temporary impairments of equity securities. We are currently assessing the potential impact that adoption of this standard may have on our financial statements.

In June 2009, the FASB issued guidance now codified as ASC 810, "Amendments to FASB Interpretation No. 46(R)" ("ASC 810"), which amends FASB Interpretation No. 46 (revised December 2003), now codified as ASC 810-10, to address the elimination of the concept of a qualifying special purpose entity. ASC 810 also replaces the quantitative-based risks and rewards calculation for determining which enterprise has a controlling financial interest in a variable interest entity with an approach focused on identifying which enterprise has the power to direct the activities of a variable interest entity and the obligation to absorb losses of the entity or the right to receive benefits from the entity. Additionally, ASC 810 provides more timely and useful information about an enterprise's involvement with a variable interest entity. ASC 810 will become effective in July 2010. The Company is currently evaluating whether this standard will have an impact on the Company's consolidated financial statements.

In August 2009, the FASB issued Accounting Standards Update No. 2009-05, "Measuring Liabilities at Fair Value" ("ASU 2009-05"). ASU 2009-05 amends ASC 820, "Fair Value Measurements" ("ASC 820"). Specifically, ASU 2009-05 provides clarification that in circumstances in which a quoted price in an active market for the identical liability is not available, a reporting entity is required to measure fair value using one or more of the following methods: 1) a valuation technique that uses a) the quoted price of the identical liability when traded as an asset or b) quoted prices for similar liabilities or similar liabilities when traded as assets and/or 2) a valuation technique that is consistent with the principles of ASC 820 (e.g. an income approach or market approach). ASU 2009-05 also clarifies that when estimating the fair value of a liability, a reporting entity is not required to adjust to include inputs relating to the existence of transfer restrictions on that liability. The adoption of this standard did not have an impact on the Company's financial position or results of operations.

In October 2009, the FASB issued ASU No. 2009-13 on ASC 605, "Revenue Recognition" ("ASC 605"), regarding multiple-deliverable revenue arrangements. This ASU provides amendments to the existing criteria for separating consideration in multiple-deliverable arrangements. The amendments establish a selling price hierarchy for determining the selling price of a deliverable, eliminate the residual method of allocation of arrangement consideration to all deliverables and require the use of the relative selling price method in allocation of arrangement consideration to all deliverables, require the determination of the best estimate of a selling price in a consistent manner, and significantly expand the disclosures related to the multiple-deliverable revenue arrangements. The amendments will be effective in fiscal years beginning on or after June 15, 2010, and early adoption is permitted. We are currently evaluating the impact on our financial statements of adopting these amendments to ASC 605 and cannot estimate the impact of adoption at this time.

In October 2009, the FASB issued ASU No. 2009-15, “Accounting for Own-Share Lending Arrangements in Contemplation of Convertible Debt Issuance or Other Financing” (“ASU 2009-15”). ASU 2009-15 amends ASC 470, “Debt with Conversion and Other Options” (“ASC 470”), and ASC 260, “Earnings Per Share” (“ASC 260”). Specifically ASU 2009-15 requires companies to mark stock loan agreements at fair value and recognize the cost of the agreements by reducing the amount of additional paid-in capital on their financial statements. The amendments will be effective for fiscal years beginning on or after December 15, 2009. We are currently evaluating the impact on our financial statements of adopting the amendments in ASU 2009-15 and cannot estimate the impact of adoption at this time.

In December 2009, the FASB issued ASU 2009-17, “Improvements to Financial Reporting by Enterprises Involved with Variable Interest Entities” (“ASU 2009-17”). ASU 2009-17 details the amendments to ASC 810, “Consolidation”, which are the result of FASB Statement No. 167, “Amendments to FASB Interpretation No. 46(R)”. That statement was issued by the FASB in June 2009. ASU 2009-17 amends the variable-interest entity guidance in ASC 810 to clarify the accounting treatment for legal entities in which equity investors do not have sufficient equity at risk for the entity to finance its activities without financial support. ASU 2009-17 is effective at the start of the first fiscal year beginning after November 15, 2009. The Company is currently evaluating whether this standard will have an impact on the Company’s consolidated financial statements.

In January 2010, the FASB issued ASU 2010-06, “Fair Value Measurements and Disclosures (Topic 820) – Improving Disclosures about Fair Value Measurements” (“ASU 2010-06”). ASU 2010-06 requires reporting entities to provide information about movements of assets among Levels 1 and 2 of the three-tier fair value hierarchy established by ASC 820. The guidance is effective for any fiscal year that begins after December 15, 2010 and should be used for quarterly and annual filings. We are currently evaluating the impact on our financial statements of adopting the amendments in ASU 2010-06 and cannot estimate the impact of adoption at this time.

ITEM 2. MANAGEMENT'S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS.

Special Note Regarding Forward Looking Statements

This quarterly report contains forward-looking statements relating to us that are based on the beliefs of our management as well as assumptions made by, and information currently available to, our management. When used in this Report, the words "anticipate," "believe," "estimate," "expect," "intend," "plan" and similar expressions, as they relate to our management, are intended to identify forward-looking statements. These statements reflect management's current view of us concerning future events and are subject to certain risks, uncertainties and assumptions, including among many others: plans to expand our exports outside of China; plans to increase our production capacity and the anticipated dates that such facilities may commence operations; our ability to obtain additional funding for our continuing operations and to fund our expansion; our ability to meet our financial projections for any financial year; our ability to retain our key executives and to hire additional senior management; continued growth of the Chinese economy and industries demanding our products; our ability to produce and sell cold-rolled precision steel products at high margins; our ability to secure at acceptable prices the raw materials we need to produce our products; political changes in China that may impact our ability to produce and sell our products in our target markets; general business conditions and competitive factors, including pricing pressures and product development; changes in our relationships with customers and suppliers; and other risks and uncertainties. Should any of these risks or uncertainties materialize, or should underlying assumptions prove incorrect, actual results may vary materially from those described in this Report as anticipated, estimated or expected. We undertake no obligation to publicly release any revisions to the forward-looking statements after the date of this document. You should carefully review the risk factors described in other documents we file from time to time with the U.S. Securities and Exchange Commission, including our Annual Report on Form 10-K for our fiscal year ended June 30, 2009.

The following discussion should be read in conjunction with our unaudited consolidated financial statements and the related notes that appear in Part I, Item 1, "Financial Statements," of this quarterly report. Our unaudited consolidated financial statements are stated in United States Dollars and are prepared in accordance with United States Generally Accepted Accounting Principles. The following discussion and analysis covers the Company's consolidated financial condition at March 31, 2010 (unaudited) and June 30, 2009, the end of its prior fiscal year, and its unaudited consolidated results of operation for the three and nine month periods ended March 31, 2010 and 2009.

Use of Terms

Except as otherwise indicated by the context, all references in this Quarterly Report to (i) the "Group," the "Company," "we," "us" or "our" are to China Precision Steel, Inc., a Delaware corporation, and its direct and indirect subsidiaries; (ii) "PSHL" are to our subsidiary Partner Success Holdings Limited, a BVI company; (iii) "Blessford International" are to PSHL's subsidiary Blessford International Limited, a BVI company; (iv) "Shanghai Blessford" are to Blessford International's subsidiary Shanghai Blessford Alloy Company Limited, a PRC company; (v) "Chengtong" are to PSHL's subsidiary Shanghai Chengtong Precision Strip Company Limited, a PRC company; (vi) "Tuorong" are to PSHL's subsidiary Shanghai Tuorong Precision Strip Company Limited, a PRC company; (vii) "SEC" are to the United States Securities and Exchange Commission; (viii) "Securities Act" are to the Securities Act of 1933, as amended; (ix) "Exchange Act" are to the Securities Exchange Act of 1934, as amended; (x) "RMB" are to Renminbi, the legal currency of China; (xi) "U.S. dollar," "USD," "US$" and "$" are to the legal currency of the United States; (xii) "China," "Chinese" "PRC" are to the People's Republic of China; and (xiii) "BVI" are to the British Virgin Islands.

Overview of Our Business

We are a niche and high value-added steel processing company principally engaged in the manufacture and sale of high precision cold-rolled steel products, in the provision of heat treatment and in the cutting and slitting of medium and high-carbon hot-rolled steel strips. We use commodity steel to create a high value-added specialty premium steel. Specialty precision steel pertains to the precision of measurements and tolerances of thickness, shape, width, surface finish and other special quality features of highly-engineered end-use applications.

We produce and sell precision ultra-thin and high strength cold-rolled steel products ranging from 7.5 mm to 0.03 mm. We also provide heat treatment and cutting and slitting of medium and high-carbon hot-rolled steel strips not exceeding 7.5 mm thickness. Our process puts hot-rolled de-scaled (pickled) steel coils through a cold-rolling mill, utilizing our patented systems and high technology reduction processing procedures, to make steel coils and sheets in customized thicknesses according to customer specifications. Currently, our specialty precision products are mainly used in the manufacture of automobile parts and components, steel roofing, plane friction discs, appliances, food packaging materials, saw blades, textile needles, and microelectronics.

We conduct our operations principally in the PRC through our wholly-owned operating subsidiaries, Chengtong and Shanghai Blessford, which are wholly owned subsidiaries of our direct subsidiary, PSHL. Our products are sold domestically in the PRC as well as in overseas markets such as Thailand, Nigeria and Ethiopia. We intend to further expand into additional overseas markets in the future, subject to suitable market conditions and favorable regulatory controls.

Third Quarter Financial Performance Highlights

During the third fiscal quarter of 2010, we saw robust growth in demand for our cold rolled steel products as market sentiment continued to improve. We have seen gradually increasing demand and orders from both our long term and new customers, especially in the low-carbon cold-rolled steel segment and the high-carbon cold-rolled steel segment, due to favorable policies and PRC government subsidies for the home appliance industry and the auto industry, where our products in these two segments are used in the manufacturing of certain components. However, despite the positive growth we have seen during the current period, general industry problems such as excess capacity, low industrial concentration and a lack of access to natural resources that have long plagued China's steel sector still remain. Starting January 1, 2010, we have commenced production from our 3rd cold rolling mill and we are operating a total of three cold rolling mills at our facilities now, at a combined utilization rate of approximately 80% as of March 31, 2010.

During the three months ended March 31, 2010, we sold a total of 36,953 tons of products, an increase of 25,953 tons from 11,000 tons during the same period a year ago, due to an increase in demand in a gradually improving market as well as the addition of our 3rd mill which increases our total annual production capacity from 120,000 tons to 160,000 tons during its first year of operation and ultimately to 220,000 tons when it reaches its full design capacity in the next three to four years. We believe that such increase was mainly caused by increases in demand from the auto and home appliance products due to PRC government subsidies to encourage consumer spending in these segments during the period ended March 31, 2010. Increased volume and sales have led to a gross profit of $3,429,875 and a net income of $2,011,354 for the three months ended March 31, 2010. Total company backlog as of March 31, 2010 was $36,752,762.

We continue to take appropriate actions to perform business and credit reviews of customers and suppliers and reduce exposure by avoiding entry into contracts with countries or customers with high credit risks. We strive to optimize our product mix, prioritize higher margin products, and strengthen collection of accounts receivable in the existing business environment with the goal to maintain overall healthy sales volume, margins and cash positions. We believe that there are high barriers to entry in the Chinese domestic precision cold-rolled steel industry because of the level of technology expertise required for operation. Although we expect a continuation of volatility in demand in both domestic and international markets, and in steel prices which could have adverse impacts on our gross margins in the foreseeable future, the medium to long term prospects of our niche remain highly optimistic. We believe that our unique capabilities and know-how give us a competitive advantage to grow sales and build a globally recognized brand as we continue to carry out R&D and expand to new segments, customers and markets.

The following are some financial highlights for the third fiscal quarter:

Revenues: Our revenues were approximately $30.0 million for the third quarter, an increase of 293.4% from last year.

Gross Margin/(loss): Gross margin was 11.4% for the third quarter, as compared to (26.0)% last year.

Income/(loss) from operations before tax: Income from operations before tax was approximately $2.3 million for the third quarter, as compared to loss from operations before tax of $3.0 million last year.

Net Income/(loss): Net income was approximately $2.0 million for the third quarter, as compared to a net loss of approximately $3.5 million last year.

Fully diluted Income/(loss) per share: Fully diluted income per share was $0.04 for the third quarter compared to a fully diluted loss per share of $0.08 last year.

Results of Operations

The following table sets forth key components of our results of operations for the periods indicated, in USD and as a percentage of revenues.

	Three Months Ended March 31,				Nine Months Ended March 31,			
	2010		2009		2010		2009	
	Amount	% of Revenues	Amount	% of Revenues	Amount	% of Revenues	Amount	% of Revenues
Revenues	$ 29,990,596	100.0%	$ 7,623,209	100.0%	$ 74,046,423	100.0%	$ 50,547,587	100.0%
Cost of sales (including depreciation and amortization)	26,560,721	88.6%	9,605,252	126.0%	66,277,234	89.5%	45,125,635	89.3%
Gross profit/(loss)	3,429,875	11.4%	(1,982,043)	(26.0)%	7,769,189	10.5%	5,421,952	10.7%
Selling and marketing expenses	124,589	0.4%	298,492	3.9%	227,003	0.3%	1,632,322	3.2%
Administrative expenses	773,102	2.6%	541,251	7.1%	2,005,841	2.7%	1,581,456	3.1%
Allowance for bad and doubtful debts	16	<0.1%	672	<0.1%	218,200	0.3%	3,830,134	7.6%
Depreciation and amortization expense	37,857	0.1%	33,624	0.4%	118,350	0.2%	93,145	0.2%
Total operating expenses	935,564	3.1%	874,039	11.5%	2,569,394	3.5%	7,137,057	14.1%
Income/(loss) from operations	2,494,311	8.3%	(2,856,082)	(37.5)%	5,199,795	7.0%	(1,715,105)	(3.4)%
Other revenues	9,790	<0.1%	76,556	1.0%	120,753	0.2%	336,257	0.7%
Interest and finance costs	(171,928)	(0.6)%	(257,123)	(3.4)%	(675,362)	(0.9)%	(905,305)	(1.8)%
Total other (expense)	(162,138)	(0.5)%	(180,567)	(2.4)%	(554,609)	(0.7)%	(569,048)	(1.1)%
Income/(loss) before income taxes	2,332,173	7.8%	(3,036,649)	(39.8)%	4,645,186	6.3%	(2,284,153)	(4.5)%
Income tax expense	320,819	1.1%	481,804	6.3%	319,586	0.4%	333,547	0.7%
Net income/(loss)	$ 2,011,354	6.7%	$ (3,518,453)	(46.2)%	$ 4,325,600	5.8%	$ (2,617,700)	(5.2)%
Basic earnings/(loss) per share	$ 0.04		$ (0.08)		$ 0.09		$ (0.06)	
Diluted earnings/(loss)	$ 0.04		$ (0.08)		$ 0.09		$ (0.06)	

per share

Comparison of Three Months Ended March 31, 2010 and 2009

Sales Revenues

Sales volume increased by 25,953 tons, or 236%, period-on-period, to 36,953 tons for the three months ended March 31, 2010 from 11,000 tons for the three months ended March 31, 2009 and, as a result, sales revenues increased by $22,367,387, or 293%, period-on-period to $29,990,596 for the three months ended March 31, 2010 from $7,623,209 for the three months ended March 31, 2009. The increase in sales revenues during the three months ended March 31, 2010 is attributable to increase in demand across all product segments especially our high-carbon cold-rolled products used in automobile components production and our low-carbon cold-rolled products used in home appliances production both due to favorable government policies and subsidies to encourage consumer spending, as well as increase in demand in subcontracting work during the period.

Sales by Product Line

A break-down of our sales by product line for the three months ended March 31, 2010 and 2009 is as follows:

	Three Months Ended March 31, 2010			2009			
Product Category	Quantity (tons)	$ Amount	% of Sales	Quantity (tons)	$ Amount	% of Sales	Period-on-period Qty. Variance
Low carbon hard rolled (export)	5,802	4,071,505	14	3,425	2,093,990	28	2,377
Low carbon cold-rolled	19,148	14,836,000	49	4,921	2,841,892	37	14,227
High-carbon hot-rolled	1,521	1,361,571	4	579	605,437	8	942
High-carbon cold-rolled	5,441	5,561,538	19	1,733	1,783,447	23	3,708
Subcontracting income	5,041	3,902,652	13	342	68,742	1	4,699
Sales of scrap metal	-	257,330	1	-	229,701	3	-
Total	36,953	29,990,596	100	11,000	7,623,209	100	25,953

There was increase in demand across all product categories during the three months ended March 31, 2010. High-carbon cold-rolled steel products accounted for 19% of the current sales mix at an average selling price of $1,022 per ton for the three months ended March 31, 2010, compared to 23% of the sales mix at an average selling price per ton of $1,029 for the three months ended March 31, 2009. The products in this category are mainly used in the automobile industry and the increase in sales volume period-on-period was a result of overall improved industry sentiment due to the Chinese government’s automobile stimulus policies. Low-carbon cold-rolled steel products accounted for 49% of the current sales mix at an average selling price of $775 per ton for the three months ended March 31, 2010, compared to 37% of the sales mix at an average selling price per ton of $578 for the three months ended March 31, 2009. The robust increase in demand in this category during the period was a direct result of increased orders of steel used in the production of home appliances due to subsidies granted by the Chinese government to encourage consumer spending. Low-carbon hard-rolled steel products accounted for 14% of the current sales mix at an average selling price of $702 per ton for the three months ended March 31, 2010, compared to 28% of the sales mix at an average selling price per ton of $611 for the three months ended March 31, 2009, due to a higher concentration of products sold domestically period-on-period, however, revenue increased as a result of gradual improvement of the international market. Subcontracting income increased to $3,902,652, or 13%, of the sales mix for the three months ended March 31, 2010, as compared to $68,742, or less than 1%, of the sales mix for the three months ended March 31, 2009.

	Three Months Ended March 31, 2010	2009	Variance	
Average Selling Prices	($)	($)	($)	(%)
Low-carbon hard rolled	702	611	91	15
Low-carbon cold-rolled	775	578	197	34
High-carbon hot-rolled	895	1,045	(150)	(14)
High-carbon cold-rolled	1,022	1,029	(7)	(1)
Subcontracting income	774	201	573	285

The average selling price per ton increased to $812 for the three months ended March 31, 2010, compared to the corresponding period in 2009 of $693, representing an increase of $119, or 17%, period-on-period. This increase was mainly due to increases in general steel prices and therefore selling prices during the period. Other than for high-carbon hot-rolled and high-carbon cold-rolled steel products, there were increases in average selling prices across all product categories during the period.

Sales Breakdown by Major Customer

	Three Months Ended March 31,			
	2010		2009	
Customers	$	% of Sales	$	% of Sales
Shanghai Changshuo Stainless Steel Co., Ltd.	7,333,423	24	*	*
Shanghai Shengdejia Metal Products Co., Ltd.	5,857,561	20	*	*
Hangzhou Cogeneration Co., Ltd.	5,394,598	18	*	*
Fortune Best Corporation Limited	1,357,560	5	*	*
Zhangjiagang Gangxing Innovative Construction Material Co., Ltd.	944,460	3	1,309,743	17
Unimax & Far Corporation	*	*	1,192,141	16
Changshu Jiacheng Steel Plate Coating Factory	*	*	556,119	7
Houw Hing Holdings Ltd.	*	*	546,723	7
Shanghai Wozi Jintian Saw Blade Co., Ltd.	*	*	487,029	6
Sub-total	20,887,602	70	4,091,755	53
Others	9,102,994	30	3,531,454	47
Total	29,990,596	100	7,623,209	100

* Not major customers for the relevant periods

Sales revenues generated from our top five major customers as a percentage of total sales increased to 70% for the three months ended March 31, 2010, compared to 53% for the three months ended March 31, 2009. Sales to three new major customers, Shanghai Shengdejia Metal Products Co., Ltd., Hangzhou Cogeneration Co., Ltd., Fortune Best Corporation Limited and Shanghai Changshuo Stainless Steel Co., Ltd. accounted for 67% of our sales revenues for the three months. The change in customer mix reflects management's continuous efforts in expanding our customer base and geographical coverage during the course of the quarter.

Cost of Goods Sold

Cost of sales increased by $16,955,469, or 176.5%, period-on-period, to $26,560,721 for the three months ended March 31, 2010, from $9,605,252 for the three months ended March 31, 2009. Cost of sales represented 88.6% of sales revenues for the three months ended March 31, 2010, compared to 126.0% for the three months ended March 31, 2009. Average cost per unit sold decreased to $719 for the three months ended March 31, 2010, compared to an average cost per unit sold of $873 for the three months ended March 31, 2009, representing a decrease of $154 per ton, or 17.7%, period-on-period.

	Three Months Ended March 31,			
	2010	2009	Variance	
	($)	($)	($)	(%)
Cost of goods sold				
- Raw materials	24,048,082	5,552,803	18,495,279	333.1
- Direct labor	151,579	498,968	(347,389)	(69.6)
- Manufacturing overhead	2,361,060	3,553,481	(1,192,421)	(33.6)
	26,560,721	9,605,252	16,955,469	176.5
Cost per unit sold				