



**FSL Trust Management Pte. Ltd.**

as Trustee Manager for First Ship Lease Trust

9 Temasek Boulevard, #19-03 Suntec Tower Two, Singapore 038989

Tel: 65 6836 3000 Fax: 65 6836 6001 Co. Reg. No. 200702265R

March 15, 2012

TO: The Unitholders of  
First Ship Lease Trust  
who are United States Taxpayers

PFIC ANNUAL INFORMATION STATEMENT

First Ship Lease Trust is a "Passive Foreign Investment Company" ("PFIC") for United States income tax purposes. The following is a PFIC annual information statement of First Ship Lease Trust for the taxable year 2011. This statement is provided for the benefit of Unitholders who are subject to United States income tax requirements, in reporting their pro rata share of First Ship Lease Trust's ordinary earnings and net capital gains, if any, for its taxable period in the event that they have elected to treat First Ship Lease Trust as a "Qualified Electing Fund" ("QEF") under the applicable provisions of the United States Internal Revenue Code.

**First Ship Lease Trust**  
**PFIC Annual Information Statement**

For the Taxable Year January 1, 2011 – December 31, 2011

**General Information**

Issuer Name: First Ship Lease Trust

Address: 9 Temasek Boulevard, Suntec Tower Two, #19-03, Singapore 038989

**Ordinary Earnings and Net Capital Gains**

|  | Earnings<br>per unit |          |
|--|----------------------|----------|
|  | US\$                 | US\$     |
| Ordinary Earnings                                    | 6,828,000            |          |
| Number of outstanding units (based on time periods): |                      |          |
| - January 1, 2011 – June 22, 2011                    | 598,665,077          | 0.005406 |
| - June 23, 2011 – December 31, 2011                  | 654,665,077          | 0.005486 |
| Weighted Ordinary Earnings per unit for taxable year |                      | 0.010892 |
| Net Capital Gains                                    | 0                    |          |

Your pro rata share of the ordinary earnings of First Ship Lease Trust for the Taxable Year may be determined as follows:

- a) If you owned the same number of First Ship Lease Trust units from January 1, 2011 through December 31, 2011, multiply the number of such First Ship Lease Trust units by US\$0.010892.
- b) If you did not own First Ship Lease Trust units for the entire period beginning January 1, 2011 and ended December 31, 2011, add the amounts calculated in paragraphs 1-2, below.
  - 1) Multiply the number of units you owned from January 1, 2011 through June 22, 2011 by US\$0.005406, divide the result by 173, and multiply by the number of days during the period that you held such units.
  - 2) Multiply the number of units you owned from June 23, 2011 through December 31, 2011 by US\$0.005486, divide the result by 192, and multiply by the number of days during the period that you held such units.
- c) If you owned different numbers of First Ship Lease Trust units at different times during 2011, perform the calculation specified in (b) above separately for each lot of units owned.

## Distribution of Cash and Property

|   | Per<br>Unit   | Total         | Ordinary<br>Earnings | Return of<br>Capital | Paid on           | Ex-date          |
|---|---------------|---------------|----------------------|----------------------|-------------------|------------------|
|   | US\$          | US\$'000      | US\$'000             | US\$'000             |                   |                  |
| Cash                                      |               |               |                      |                      |                   |                  |
| 1) October 1, 2010 –<br>December 31, 2010 | 0.0095        | 5,688         |                      |                      | February 25, 2011 | January 25, 2011 |
| 2) January 1, 2011 –<br>March 31, 2011    | 0.0095        | 5,687         |                      |                      | May 27, 2011      | April 27, 2011   |
| 3) April 1, 2011 – June<br>22, 2011       | 0.0087        | 5,208         |                      |                      | July 21, 2011     | June 20, 2011    |
| 4) June 23, 2011 – June<br>30, 2011       | 0.0008        | 524           |                      |                      | August 26, 2011   | July 26, 2011    |
| 5) July 1, 2011 –<br>September 30, 2011   | 0.0095        | 6,219         |                      |                      | November 28, 2011 | October 27, 2011 |
|   | <u>0.0380</u> | <u>23,326</u> | <u>6,828</u>         | <u>16,498</u>        |                   |                  |
| Property (at fair market value)           |               |               |                      |                      |                   |                  |
|   | <u>0.0000</u> | <u>0</u>      |                      |                      |                   |                  |

In accordance with Treasury Regulation Section 1.1295-1(g)(1)(iv), First Ship Lease Trust will permit Unitholders to inspect and copy its permanent books of accounts, records and other documents that it has maintained to establish that First Ship Lease Trust's ordinary earnings and net capital gains, as provided in Section 1293 of the Internal Revenue Code, are computed in accordance with U.S. federal income tax principles, and to verify the amounts and the unitholder pro rata share thereof.

Date: March 15, 2012

FSL TRUST MANAGEMENT PTE. LTD.  
(as Trustee-Manager for FIRST SHIP LEASE TRUST)

By: *Cheong Chee Tham*  
Cheong Chee Tham  
Chief Financial Officer