



EXPORTER QUESTIONNAIRE

GRINDING BALLS EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA

Period of Investigation: 1 APRIL 2017 – 31 MARCH 2018

Response due by: **20 MAY 2018**

Important note: The Commissioner will reject all requests for a longer period to provide a response to this exporter questionnaire received after this date. Extensions requested before this date will *only* be agreed to where necessary and reasonable.

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RETURN OF QUESTIONNAIRE DETAILS

Preferably by email to: operations3@adcommission.gov.au

Or by mail
(CD-ROM or USB):
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THE GOODS UNDER CONSIDERATION

Goods Description

The goods under consideration (“the goods”) i.e. the goods exported to Australia at allegedly at dumped prices and in receipt of subsidies, are:

Ferrous grinding balls, whether or not containing alloys, cast or forged, with diameters in the range 22mm to 170mm (inclusive).

The applicants provide the following additional information:

The goods covered by this application include all ferrous grinding balls, typically used for the comminution of metalliferous ores, meeting the above description of the goods regardless of the particular grade or alloy content.

Goods excluded from this application include stainless steel balls, precision balls that have been machined and/or polished, and ball bearings.

Tariff classification

The goods are currently classified to tariff subheadings 7325.91.00 (statistical code 26), 7326.11.00 (statistical code 29) and 7326.90.90 (statistical code 59) of Schedule 3 to the *Customs Tariff Act 1995*.

These goods are subject to 4 per cent Customs duty.

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BACKGROUND AND GENERAL INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the Commission) is responsible for investigating the allegation that grinding balls have been exported to Australia from China at prices less than their normal value, and in receipt of countervailable subsidies, and that the dumping and subsidisation has caused material injury to the Australian industry.

The Commission will use the information you provide to determine normal values, export prices and subsidies over the investigation period. This information will determine whether grinding balls are dumped and/or subsidised. You may make separate submissions concerning any other matter, for example injury.

The Commission investigation will be carried out under the provisions of the Part XVB of the Customs Act 1901.

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the Commission to verify the information, we may deem you uncooperative. In that case, the Commission may be required to rely on information supplied by other parties (possibly information supplied by the Australian industry), and it may assess a dumping and subsidy margin for your company based upon normal values and subsidies that may be the highest determined in your country during the investigation period.

It is in your interest, therefore, to provide a complete and accurate submission, capable of verification.

Due date for response

Manufacturers and exporters are requested to respond to this questionnaire and return it to the Commission within the time specified on the cover page.

The Commissioner must consider the Direction from the Minister for Industry, Innovation and Science as set out in the *Customs (Extensions of Time and Non-cooperation) Direction 2015* (the Direction). This Direction sets out the particular considerations that the Commissioner must take into account when:

- deciding whether a longer period is reasonably required or practicable under subsections 269TC(6) and 269TC(9) of the *Customs Act 1901* (the Act), or considering whether to allow any interested party a longer period to give any response;
- considering an insufficient response from an interested party;
- determining whether to have regard to a late response;
- determining whether an exporter is an uncooperative exporter;

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- determining whether or not an entity is a non-cooperative entity for the purposes of section 269TAACA; and
- determining whether an entity has significantly impeded a case.

The full text of the Direction and the accompanying explanatory statement is available on the Comlaw website at www.comlaw.gov.au. This and other reforms to Australia's anti-dumping system are explained in Anti-Dumping Notice No. 2015/129, available on the Commission's website at www.adcommission.gov.au.

If you cannot lodge your submission by the due date please advise the investigation Case Manager as soon as possible.

Confidential and non-confidential submissions

You are required to lodge one confidential version (for official use only) and one non-confidential version (for public record) of your submission by the due date.

Please ensure that each page of information you provide is clearly marked either "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD".

All information provided to the Commission in confidence will be treated accordingly. The public record version of your submission will be placed on the public record.

Please note, Australia's anti-dumping and countervailing legislation requires that to the extent that information given to the Commission is claimed to be confidential or whose publication would adversely affect a business or commercial interest, the person giving the information must ensure that a summary of that information contains sufficient detail to allow a reasonable understanding of the substance of the information, but does not breach confidentiality nor adversely affect those interests.

The legislation allows that a person is not required to provide a summary for the public record if the Commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information. However, such a summary would add considerably to an interested party's understanding of information contained in a document.

As provided for in Australia's anti-dumping and countervailing legislation, all submissions are required to have a bracketed explanation of deleted or blacked out information for the non-confidential version of the submission. Note that if such an explanation is not provided, the Commission may disregard the information in the submission. An example of a statement to accompany deleted/blacked out text is:

[explanation of cost allocation through the divisions].

If, for some reason, you cannot produce a non-confidential summary, please contact the investigation Case Manager.

Exporter's declaration

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At Section J, you are required to make a declaration that the information contained in your submission is complete and correct. Alternatively, if you did not export the goods during the period of investigation, you may make a declaration to that effect.

You must return a signed declaration with your response to the questionnaire.

Verification of the information that you supply

The Commission will seek to verify the information provided in your submission. Where there are a large number of exporters, the Commission may have to verify information from selected exporters only. The purpose of the visit is to verify the information submitted in response to this questionnaire. It is not meant to be a chance for you to provide new or additional information. The Commission expects your response to the questionnaire to be complete and accurate.

Verification visits take several days. We will want to examine in detail your company's records in respect of the goods and will ask for copies of documents relating to the manufacture and sale of the goods. We will need to consult with your staff, particularly your financial controller (or accountant) and your domestic and export sales people. We may also need to see your factory, in which case we will need to consult with your operational managers.

After gathering the information we will prepare a report of the visit. We will provide you with a draft of the report and then respond to any questions you have. We will ask you to prepare a non-confidential copy of the report for the public record.

If you do not manufacture the goods

You may export but not produce or manufacture the goods (for example, you are a trading company, broker, or vendor dealing in the goods). In such cases it is important that you forward a copy of this questionnaire to the relevant manufacturers **immediately**. You should also inform the investigation case officer of the contact details for these manufacturers.

You should complete those sections of the questionnaire that you are reasonably able to complete. If, for example, you are unable to supply details of production costs, you should clearly explain why the section does not apply to your company.

If you do not export the goods

Depending on the arrangement for sale of the goods to Australia through an intermediary, the Commission will have to determine who is the exporter of the goods for the purpose of this investigation.

In any case, information (such as cost of production data) supplied by the manufacturer will be relevant to establishing the normal value of the goods. In the absence of verified information, the Commission may use other available information. This information may result in a decision less favourable to your company.

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Outline of information required by this questionnaire

- Section A** General information relating to your company including financial reports.
- Section B** A complete list of your company's exports to Australia over the investigation period.
- Section C** A list of goods sold on the domestic market of the country of export (like goods) that may be compared to the goods under consideration (the goods).
- Section D** A detailed list of all of your company's sales of like goods in your domestic market.
- Section E** Information to allow a fair comparison between export and domestic prices.
- Section F** Information in relation to your company's exports of like goods to countries other than Australia.
- Section G** Costs to make and sell, for exports to Australia and for the domestic market.
- Section H** Particular market situation
- Section I** Countervailing (subsidisation)
- Section J** Your declaration.
- Section K** Exporter questionnaire response checklist
- Appendix 1** A glossary of terms used in this questionnaire

Some general instructions for preparing your response

- When answering the questionnaire please carefully read all instructions. The Commission requires a response to *all* sections of this questionnaire. Please provide an explanation if a question is not relevant to your situation.
- Answer questions in the order presented in the questionnaire. Please ensure that information submitted conforms to the requested format and is clearly labelled. Please repeat the question to which you are responding and place your answer below it.
- Identify source documents and advise where they are kept. During on-site verification you should be prepared to substantiate all the information you have submitted. Every part of the response should be traceable to company documents that are used in the ordinary course of business.
- We recommend that you retain all work sheets used in answering the questionnaire, in particular those linking the information supplied with management and accounting records. This will help us to verify the information.

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- Clearly identify all units of measurement and currencies used. Apply the same measurement consistently throughout your response to the questionnaire.

Instructions on providing electronic data

- It is important that information is submitted in electronic format.
- Electronic data should be emailed, or submitted on a CD-ROM or USB.
- The data must be created as spreadsheet files, preferably in Microsoft Excel, or alternatively in an Excel compatible format (for example, Excel can normally access data in Dbase or as an ASCII file). Excel files must be compatible to the USA version.
- An Excel workbook, ***Exporter Questionnaire spreadsheets – grinding balls*** accompanies this questionnaire and forms a template for your response to the data requested. The workbook is referred to throughout this questionnaire as appropriate. This workbook should be completed and used to provide the requested data where possible.
- If you cannot present electronic data in the requested format contact the investigation case officer as soon as possible.

Further information

Before you respond to the questionnaire you should read all the key documentation related to this application including the applicant's non-confidential submission and the Anti-Dumping Notice notifying the initiation of the investigation. These documents are available on the Commission's website, www.adcommision.gov.au

We also advise that you read the attached glossary of terms.

If you require further assistance, or you are having difficulties completing your submission, please contact the investigation Case Manager. The Commission will need to know the reasons.

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SECTION A - COMPANY STRUCTURE AND OPERATIONS

This section requests information relating to company details and financial reports.

A-1 Identity and communication

Please nominate a person within your company who can be contacted for the purposes of this investigation:

Head Office:

Name: [REDACTED]
Position in the company: [REDACTED]
Address: [REDACTED]
Telephone: [REDACTED]
Facsimile number: [REDACTED]
E-mail address of contact person: [REDACTED]

Factory:

Address: [REDACTED]
Telephone: [REDACTED]
Facsimile number: [REDACTED]
E-mail address of contact person: [REDACTED]

A-2 Representative of the company for the purpose of investigation

If you wish to appoint a representative to assist you in this investigation, provide the following details:

Name: [REDACTED]
Address: [REDACTED]
Telephone: [REDACTED]
Facsimile/Telex number: [REDACTED]
E-mail address of contact person: [REDACTED]

Note that in nominating a representative, the Commission will assume that confidential material relating to your company in this investigation may be freely released to, or discussed with, that representative.

A-3 Company information

1. What is the legal name of your business? What kind of entity is it (e.g. company, partnership, sole trader)? Please provide details of any other business names that you use to export and/or sell goods.

Answer: Anhui Sanfang New Material Technology Co., Ltd. (hereinafter referred as "Sanfang" or "the company") is a limited liability company, and it has only one name under which the company uses to sell goods.

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2. Who are the owners and/or principal shareholders? Provide details of shareholding percentages for joint owners and/or principal shareholders. (List all shareholders able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company).

Answer: Shareholding structure of the company is as following:

NAME OF SHAREHOLDER	SHAREHOLDING PERCENTAGE
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

3. If your company is a subsidiary of another company, list the principal shareholders of that company.

Answer: Currently, Sanfang has [REDACTED] shareholders, [REDACTED] therefore, the company is not subsidiary of another company.(Details of shareholders)

4. If your parent company is a subsidiary of another company, list the principal shareholders of that company.

Answer: Not applicable, as explained above, the company is not a subsidiary of another company.

5. Provide a diagram showing all associated or affiliated companies and your company's place within that corporate structure.

Answer: Not applicable, the company has no associated or affiliated companies.

6. Are any management fees/corporate allocations charged to your company by your parent or related company?

Answer: Not applicable, the company has no associated or affiliated companies.

7. Describe the nature of your company's business. Explain whether you are a producer or manufacturer, distributor, trading company, etc.

Answer: Sanfang is a limited liability company, who produces and sells grinding materials.

8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:

- produce or manufacture
- sell in the domestic market
- export to Australia, and

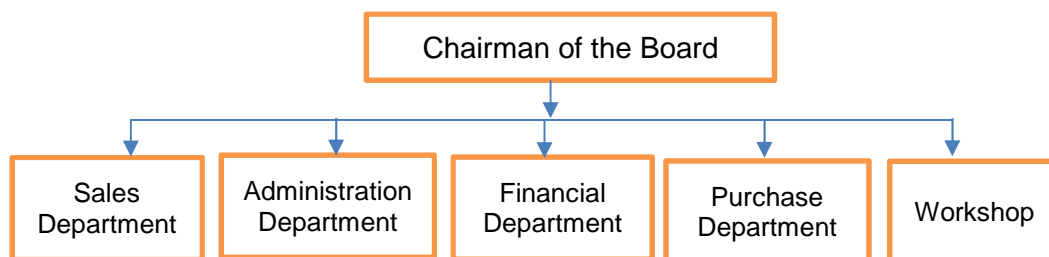
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- export to countries other than Australia.

Answer: The company produces and sell the goods under consideration in the domestic market but didn't make exports to Australia.

9. Provide your company's internal organisation chart. Describe the functions performed by each group within the organisation.

Answer: Please refer to the following chart:



Chairman of the Board: Head of the company, making company strategy, approving company budget, normal company management;

Sales Department: Exploring market opportunities, Analysing market trend, maintaining customer relationships, making sales plan, Receiving purchase orders etc.

Administration Department: Receiving customers, employing staff and workers, managing company documents, Arranging meetings etc.

Financial Department: Making financial accounting, financial reports, tax issues, Analysing and reporting financial situation of the company to Chairman of the Board etc.

Purchase department: Purchasing materials and products from suppliers;

Workshop: Making production plan, arranging production schedules and reporting production to Financial department and Chairman etc.

10. Provide a copy of your most recent annual report together with any relevant brochures or pamphlets on your business activities.

Answer: Not applicable, the company is a small company which has no annual reports and doesn't use brochures or pamphlets.

A-4 General accounting/administration information

1. Indicate your accounting period.

Answer: From 1st January to 31st December.

2. Indicate the address where the company's financial records are held.

Answer: Financial records of the company is located at Wangxi Area, Ningguo Economic And Technological Development Zone, Anhui Province, 242300.

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3. Please provide the following financial documents for the two most recently completed financial years plus all subsequent monthly, quarterly or half yearly statements:

- chart of accounts;
- audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);
- internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods under consideration.

These documents should relate to:

- the division or section/s of your business responsible for the production and sale of the goods under consideration, and
- the company.

Answer: Please refer to Appendix 3-1 Chart of Accounts and Appendix 3-2 Financial Statements.

Note:

(Auditing requirements)

4. If you are not required to have the accounts audited, provide the unaudited financial statements for the two most recently completed financial years, together with your taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

Answer: Please refer to Appendix 4 Financial Statements and Tax Returns.

5. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If so, provide details.

Answer: It is confirmed that the accounting practices of the company are fully in line with accounting principles in China.

6. Describe:

The significant accounting policies that govern your system of accounting, in particular:

- the method of valuation for raw material, work-in-process, and finished goods inventories (e.g. last in first out –LIFO, first in first out- FIFO, weighted average);

Answer: The company uses weighted average method to account value of raw material, work-in-process, and finished goods inventories.

- costing methods, including the method (e.g. by tonnes, units, revenue, direct costs etc.) of allocating costs shared with other goods or processes (such as front office cost, infrastructure cost etc.);

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Answer: Cost for the goods under consideration includes direct materials, auxiliary materials, labour, manufacturing expenses, electricity etc.

Direct materials, auxiliary materials and direct labour are accounted based on actual consumption, and electricity are allocated according to standard electricity consumption.

- valuation methods for damaged or sub-standard goods generated at the various stages of production;

Answer: Normally, the company doesn't account cost for damaged goods, which will be sold directly as other business revenues, and cost of sub-standard goods are same with those of prime goods.

- valuation methods for scrap, by products, or joint products;

Answer: [REDACTED] (valuation of scrap treatment)

- valuation and revaluation methods for fixed assets;

Answer: Not applicable, the company doesn't have revaluation for fixed assets.

- average useful life for each class of production equipment and depreciation method and rate used for each;

Answer: Fixed assets are recorded at actual cost. Depreciation of fixed assets is calculated using the Straight-line method and Sum-of-the-years-digits method. Depreciation rates are determined according to the type of fixed assets, estimated useful life and estimated residual value rate of 5%, as follows:

Items	Depreciation Life (Years)	Annual Depreciation Rate (%)
Housing and Buildings	20	■
Machinery	4	■
Means of Transportation	10	■
Electronic device and office equipment	3	■
Other Equipment	5	■

- treatment of foreign exchange gains and losses arising from transactions;

Answer: Accounts receivable for foreign transactions will generate foreign exchange gains and losses due to the exchange rates fluctuation, and the company normally registers the foreign exchange gains and losses at the end of the accounting year.

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- treatment of foreign exchange gains/losses arising from the translation of balance sheet items;

Answer: Not applicable, the company only has balance sheet in Chinese yuan, no other currencies.

- inclusion of general expenses and/or interest;

Answer: Not applicable, there are no accounting policies as inclusion of general expenses and/or interest.

- provisions for bad or doubtful debts;

Answer: Recognition standards of bad debts of the company are: The accounts receivable that cannot be recovered after liquidation of bankruptcy assets or bequest upon bankruptcy or death of debtor; Or the one unrecoverable due to debtor's failure to perform his/her discharge liability within the time limit and with apparent characteristics showing that it is unrecoverable shall be recognized as bad debt with the approval of the Company.

On Balance Sheet Date, for single item of account receivable with significant amount, it shall conduct separate devaluation testing. In case it is proven to be devalued by objective evidence, the loss of devaluation shall be confirmed according to the balance between future cash value and book value, and relative provision for bad debt shall be prepared.

- expenses for idle equipment and/or plant shut-downs;

Answer: Not applicable, there are no accounting policies for expenses for idle equipment and/or plant shut-downs.

- costs of plant closure;

Answer: Not applicable, there are no accounting policies as plant closure.

- restructuring costs;

Answer: Not applicable, there are no accounting policies as restructuring costs.

- by-products and scrap materials resulting from your company's production process; and

Answer: Scrap materials resulting from company's production process normally are discarded or sold.

- effects of inflation on financial statement information.

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Answer: Not applicable, there are no accounting policies as effects of inflation on financial statement information.

7. In the event that any of the accounting methods used by your company have changed over the last two years provide an explanation of the changes, the date of change, and the reasons for it.

Answer: Not applicable, none of the accounting methods used by the company have changed over the last two years.

A-5 Income statement

Complete the spreadsheet '**Income statement**' in the *Exporter Questionnaire spreadsheets – grinding balls* workbook.

Note: if your financial information does not permit you to present information in accordance with this spreadsheet please present the information in a form that closely matches the table.

You will note that the spreadsheet requires information concerning all products produced and for the goods under consideration ('*goods under consideration*' (the goods) is defined in the Glossary of Terms in the appendix to this form). You should explain how costs have been allocated.

This information will be used to verify the completeness of cost data that you provide in Section G. If, because of your company's structure, the allocations would not be helpful in this process, please explain why this is the case.

Answer: Please refer to Appendix A-5 Income Statement.

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A-6 Sales

Complete the spreadsheet 'Turnover' in the *Exporter Questionnaire spreadsheets – grinding balls* workbook.

Note: if your financial information does not permit you to present information in accordance with this spreadsheet please present the information in a form that closely matches the table.

This requires you to state your company's net turnover (after returns and all discounts), and free of duties and taxes. Use the currency in which your accounts are kept.

This information will be used to verify the cost allocations to the goods under consideration in Section G.

Also, you should be prepared to demonstrate that sales data shown for the goods is a complete record by linking total sales of these goods to relevant financial statements.

Answer: Please refer to Appendix A-6 Turnover.

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SECTION B - SALES TO AUSTRALIA (EXPORT PRICE)

This section requests information concerning your export practices and prices to Australia. You should include costs incurred beyond ex-factory. Export prices are usually assessed at FOB point, but the Commission may also compare prices at the ex-factory level, or another level if considered appropriate.

*You should report prices of **all** goods under consideration (the goods) **shipped** to Australia during the investigation period.*

The invoice date will normally be taken to be the date of sale. If you consider:

- the sale date is not the invoice date (see 'date of sale' column in question B4 below) and;*
- an alternative date should be used when comparing export and domestic prices*

*you **must** provide information in section D on domestic selling prices for a matching period – even if doing so means that such domestic sales data predates the commencement of the investigation period.*

Answer: Section B is not applicable, since the company did not make exports of the goods under consideration to Australia during period of review.

B-1 For each customer in Australia to whom you shipped goods in the investigation period list:

- name;
- address;
- contact name and phone/fax number where known; and
- trade level (for example: distributor, wholesaler, retailer, end user, original equipment manufacturer).

B-2 For each customer identified in B1 please provide the following information.

- (a) Describe how the goods are sent to each customer in Australia, including a diagram if required.
- (b) Identify each party in the distribution chain and describe the functions performed by them. Where commissions are paid indicate whether it is a pre or post exportation expense having regard to the date of sale.
- (c) Explain who retains ownership of the goods at each stage of the distribution chain. In the case of DDP sales, explain who retains ownership when the goods enter Australia.
- (d) Describe any agency or distributor agreements or other contracts entered into in relation to the Australian market (supply copy of the agreement if possible).

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- (e) Explain in detail the process by which you negotiate price, receive orders, deliver, invoice and receive payment. If export prices are based on price lists supply copies of those lists.
- (f) State whether your firm is related to any of its Australian customers. Give details of any financial or other arrangements (e.g. free goods, rebates, or promotional subsidies) with the customers in Australia (including parties representing either your firm or the customers).
- (g) Details of the forward orders of the goods under consideration (include quantities, values and scheduled shipping dates).

B-3 Do your export selling prices vary according to the distribution channel identified? If so, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

B-4 Australian sales data

Complete the 'Australian sales' spreadsheet in the **Exporter Questionnaire spreadsheets – grinding balls** workbook.

This data should be provided on a transaction by transaction basis.

The below table provides some explanation of the data requested in the Australian sales spreadsheet.

Column heading	Explanation
Customer name	Names of your customers
Level of trade	The level of trade of your customers in Australia
Model	Commercial model name
Product code	Code used in your records for the model/grade/type identified. Explain the product codes in your submission.
Dimension	Specify ball diameter (mm)
Grade	Specify grade
Cr Alloy content	Specify chromium %
Production Method	Specify if the grinding balls are produced by forging or casting
Invoice number	Invoice number
Invoice date	Invoice date
Date of sale	Refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale, report that date. For example, order confirmation, contract, or purchase order date.
Order number	If applicable, show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Shipping terms	Delivery terms e.g. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	Agreed payment terms e.g. 60 days=60 etc.
Actual weight	Actual weight (specify units e.g. Tonnes)
Gross invoice value	Gross invoice value shown on invoice <i>in the currency of sale, excluding taxes.</i>
Discounts on the invoice	If applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount

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	applying in another column.
Rebates or other allowances	The amount of any deferred rebates or allowances paid to the importer in the currency of sale.
Other charges	Any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide a description.
Invoice currency	The currency used on the invoice
Exchange rate	Indicate the exchange rate used to convert the currency of the sale to the currency used in your accounting system
Net invoice value in the currency of the exporting country	The net invoice value expressed in your domestic currency as it is entered in your accounting system
Other discounts	The actual amount of other discounts (e.g. quantity discounts) not deducted from the invoice. Show a separate column for each type of quantity discount.
Ocean freight**	The actual amount of ocean freight incurred on each export shipment listed.
Marine insurance	Amount of marine insurance
FOB export price**	The free on board price at the port of shipment.
Packing method	Method of packaging (in drums, on pallets etc.)
Packing expenses*	Packing expenses
Inland transportation costs*	Inland transportation costs included in the selling price. For export sales this is the inland freight from factory to port in the country of export.
Handling, loading & ancillary expenses*	Handling, loading & ancillary expenses. For example, terminal handling, export inspection, wharfage & other port charges, container tax, document fees & customs brokers fees, clearance fees, bank charges, letter of credit fees, & other ancillary charges incurred in the exporting country.
Warranty & guarantee expenses*	Warranty & guarantee expenses
Technical assistance & other services*	Expenses for after sale services, such as technical assistance
Commission	Commissions paid. If more than one type is paid insert additional columns of data.
Other Costs	Any other costs, charges or expenses incurred in relation to the exports to Australia (include additional columns as required). See question B.5.

** FOB export price and Ocean Freight:

FOB export price: An FOB export price must be calculated for each shipment - regardless of the shipping terms. FOB price includes inland transportation to the port of exportation, inland insurance, handling, and loading charges. It excludes post exportation expenses such as ocean freight and insurance. Use a formula to show the method of the calculation on each line of the export sales spreadsheet.

Ocean freight: as ocean freight is a significant cost it is important that the actual amount of ocean freight incurred on each exportation be reported. If estimates must be made you must explain the reasons and set out the basis - estimates must reflect changes in freight rates over the investigation period.

Freight allocations must be checked for consistency.

* All of these costs are further explained in section E-1.

PUBLIC RECORD VERSION

B-5 If there are any other costs, charges or expenses incurred in respect of the exports listed above which have not been identified in the table above, add a column (see “other factors” in question B-4) for each item, and provide a description of each item. For example, other selling expenses (direct or indirect) incurred in relation to the export sales to Australia.

B-6 For each type of discount, rebate, allowance offered on export sales to Australia:

- provide a description; and
- explain the terms and conditions that must be met by the importer to obtain the discount.

Where the amounts of these discounts, rebates etc. are not identified on the sales invoice, explain how you calculated the amount shown in your response to question B4. If they vary by customer or level provide an explanation.

B-7 If you have issued credit notes (directly or indirectly) to the customers in Australia, in relation to the invoices listed in the detailed transaction by transaction listing in response to question B4, provide details of each credit note if the credited amount has **not** been reported as a discount or rebate.

B-8 If the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred. For example:

Import duties	Amount of import duty paid in Australia
Inland transport	Amount of inland transportation expenses within Australia included in the selling price
Other costs	Customs brokers, port and other costs incurred (itemise)

B-9 Select two shipments, in different quarters of the investigation period, and provide a complete set of all of the documentation related to the export sale. For example:

- the importer’s purchase order, order confirmation, and contract of sale;
- commercial invoice;
- bill of lading, export permit;
- freight invoices in relation to movement of the goods from factory to Australia, including inland freight contract;
- marine insurance expenses; and
- letter of credit, and bank documentation, proving payment.

PUBLIC RECORD VERSION

The Commission will select additional shipments for payment verification at the time of the visit.

PUBLIC RECORD VERSION

SECTION C - EXPORTED GOODS & LIKE GOODS

Answer: As per Section B the company did not make exports of the goods under consideration to Australia during period of review.

- C-1** Fully describe all of the goods you have exported to Australia during the investigation period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the exported goods.

- C-2** List each type of goods exported to Australia (these types should cover all types listed in spreadsheet “**Australian sales**” – see section B of this questionnaire).

- C-3** If you sell like goods on the domestic market, for each type of the goods that your company has exported to Australia during the investigation period, list the most comparable model(s) sold domestically; and provide a detailed explanation of the differences where the domestic goods (ie. the like goods – see explanation in glossary) are not identical to goods exported to Australia.

An example of how this information can be presented is provided in the below table.

EXPORTED TYPE	DOMESTIC TYPE	IDENTICAL ?	DIFFERENCES
Product code of each model of the goods exported to Australia No exports made to Australia.	Product code of comparable model sold on the domestic market of the country of export Cast grinding balls of 40mm and 100 mm containing low % of chromium below 3% There are no product codes.	If goods are identical indicate “YES”. Otherwise “NO” If exported, the goods would be identical	Where the good exported to Australia is not identical to the like goods, describe the specification differences. If it is impractical to detail specification differences in this table refer to documents which outline differences

- C-4** Please provide any technical and illustrative material that may be helpful in identifying or classifying the goods that your company sells on the domestic market.

Sample Mill Test certificates have been supplied.

[REDACTED] & # [REDACTED] refer-

PUBLIC RECORD VERSION

SECTION D - DOMESTIC SALES

This section seeks information about the sales arrangements and prices in the domestic market of the country of export.

*All domestic sales made during the investigation period must be listed transaction by transaction. If there is an extraordinarily large volume of sales data and you are unable to provide the complete listing electronically you **must** contact the case officer **before** completing the questionnaire. If the case officer agrees that it is not possible to obtain a complete listing he or she will consider a method for sampling that meets the Commission's requirements. If agreement cannot be reached as to the appropriate method the Commission may not visit your company.*

The Commission will normally take the invoice date as being the date of sale in order to determine which sales fall within the investigation period.

If, in response to question B4 (Sales to Australia, Export Price), you have reported that the date of sale is not the invoice date and you consider that this alternative date should be used when comparing domestic and export prices –

- you **must** provide information on domestic selling prices for a matching period - even if doing so means that such domestic sales data predates the commencement of the investigation period.*
- If you do not have any domestic sales of like goods you must contact the case officer who will explain the information the Commission requires for determining a normal value using alternative methods.*

D-1 Provide:

- a detailed description of your distribution channels to domestic customers, including a diagram if appropriate;
- information concerning the functions/activities performed by each party in the distribution chain; and
- a copy of any agency or distributor agreements, or contracts entered into.

If any of the customers listed are associated with your business, provide details of that association. Describe the effect, if any, that association has upon the price.

Answer: Most of customers of the company in domestic market are end users, and the company sold the goods under consideration directly to its customers, whether end users or trading companies, without any intermediaries or agencies between the company and its customers.

D-2 Do your domestic selling prices vary according to the distribution channel identified? If so, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

PUBLIC RECORD VERSION

Answer: Not applicable, domestic selling prices of the company don't vary according to the distribution channels.

D-3 Explain in detail the sales process, including:

- the way in which you set the price, receive orders, make delivery, invoice and finally receive payment; and the terms of the sales; and
- whether price includes the cost of delivery to customer.

If sales are in accordance with price lists, provide copies of the price lists.

Answer:

The company does not have price lists.

Generally, the company's sales person contacts the customers and selling prices are mutually negotiated based on purchase or total production cost and selling, delivery, payment terms plus profit but which are also subject to approval by the manager of the sales department and the chairman of the board . When all sales terms are finalised, the company will arrange production by its own workshop or third party suppliers. Some customers might be required to pay certain portion of advance payment . Customers elect to either pick up the goods or have them delivered as per the sales terms. Customers then pay If any balance of payment is due and the company then issues VAT invoice.

D-4 Domestic sales data

Complete the 'Domestic sales' spreadsheet in the *Exporter Questionnaire spreadsheets – grinding balls* workbook.

This data should be provided on a transaction by transaction basis.

The below table provides some explanation of the data requested in the Domestic sales spreadsheet.

Column heading	Explanation
Customer name	Names of your customers. If an English version of the name is not easily produced from your automated systems show a customer code number and in a separate table list each code and name.
Level of trade	The level of trade of your domestic customer.
Model	Commercial model name.
Dimension	Specify ball diameter (mm).
Product code	Code used in your records for the model/grade/type of the goods identified. Explain the product codes in your submission.
Cr Alloy content	Specify chromium %.
Production method	Specify if the grinding balls are produced by forging or casting.
Invoice number	Invoice number.
Invoice date	Invoice date.
Date of sale	Refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale and should be used, report that date. For example, order confirmation, contract, or purchase order date.

PUBLIC RECORD VERSION

Column heading	Explanation
Order number	Show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Delivery terms	e.g. ex factory, free on truck, delivered into store.
Payment terms	Payment terms agreed with the customer e.g. 60 days=60 etc.
Quantity	Quantity in units shown on the invoice e.g. kg.
Gross Invoice value	Gross value shown on invoice <i>in the currency of sale</i> , net of taxes.
Discounts on the Invoice	The amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Other charges	Any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide description.
Net invoice value in the currency of the exporting country	The net invoice value expressed in your domestic currency as recorded in your accounting system.
Rebates or other Allowances	The actual amount of any deferred rebates or allowances in the currency of sale.
Quantity discounts	The actual amount of quantity discounts not deducted from the invoice. Show a separate column for each type of quantity discount.
Packing method	Method of packaging (in drums, on pallets etc.).
Packing expense*	Packing expenses.
Inland transportation Costs*	Amount of inland transportation costs included in the selling price.
Handling, loading and ancillary expenses*	Handling, loading & ancillary expenses.
Warranty & Guarantee expenses*	Warranty & guarantee expenses
Technical assistance & other services*	Expenses for after sale services such as technical assistance
Commissions*	Commissions paid. If more than one type is paid insert additional columns of data.
Other factors*	Any other costs, charges or expenses incurred in relation to the domestic sales (include additional columns as required). See question D5.

Costs marked with * are explained in section E-2.

Answer: Please refer to Appendix D-4 Domestic Sales.

D-5 If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-4 above add a column for each item (see “other factors”). For example, certain other selling expenses incurred.

Answer: Only Inland transportation costs are incurred for domestic sales, please refer to Appendix D-4.

D-6 For each type of commission, discount, rebate, allowance offered on domestic sales of like goods:

- provide a description; and
- explain the terms and conditions that must be met by the customer to qualify for payment.

PUBLIC RECORD VERSION

Where the amounts of these discounts, rebates etc. are not identified on the sales invoice, explain how you calculated the amounts shown in your response to question D4.

If you have issued credit notes, directly or indirectly to the customers, provide details if the credited amount has **not** been reported as a discount or rebate.

Answer: Not applicable, there are no commission, discount, rebate or allowance offered on domestic sales of like goods.

D-7 Select two domestic sales, in different quarters of the investigation period, that are at the same level of trade as the export sales. Provide a complete set of documentation for those two sales. (Include, for example, purchase order, order acceptance, commercial invoice, discounts or rebates applicable, credit/debit notes, long or short term contract of sale, inland freight contract, bank documentation showing proof of payment.)

The Commission will select additional sales for verification at the time of our visit.

Answer: Please refer to Appendix D-7 Domestic Sales Document Samples.

PUBLIC RECORD VERSION

SECTION E - FAIR COMPARISON

Section B sought information about the export prices to Australia and Section D sought information about prices on your domestic market for like goods (i.e. the normal value).

Where the normal value and the export price are not comparable adjustments may be made. This section informs you of the fair comparison principle and asks you to quantify the amount of any adjustment.

As prices are being compared, the purpose of the adjustments is to eliminate factors that have unequally modified the prices to be compared.

To be able to quantify the level of any adjustment it will usually be necessary to examine cost differences between sales in different markets. The Commission must be satisfied that those costs are likely to have influenced price. In practice, this means that the expense item for which an adjustment is claimed should have a close nexus to the sale. For example, the cost is incurred because of the sale, or because the cost is related to the sale terms and conditions.

Conversely, where there is not a direct relationship between the expense item and the sale a greater burden is placed upon the claimant to demonstrate that prices have been affected, or are likely to have been affected, by the expense item. In the absence of such evidence the Commission may disallow the adjustment.

Where possible, the adjustment should be based upon actual costs incurred when making the relevant sales. However, if such specific expense information is unavailable cost allocations may be considered. In this case, the party making the adjustment claim must demonstrate that the allocation method reasonably estimates costs incurred.

A party seeking an adjustment has the obligation to substantiate the claim by relevant evidence that would allow a full analysis of the circumstances, and the accounting data, relating to the claim.

The investigation must be completed within strict time limits therefore you must supply information concerning claims for adjustments in a timely manner. Where an exporter has knowledge of the material substantiating an adjustment claim that material is to be available at the time of the verification visit. The Commission will not consider new claims made after the verification visit.

PUBLIC RECORD VERSION

E-1 Costs associated with export sales

(These cost adjustments will relate to your responses made at question B-4, 'Australian sales')

Answer: Not applicable, since the company did not make Australian sales during period of review.

1. Transportation

Explain how you have quantified the amount of inland transportation associated with the export sale ("**Inland transportation costs**"). Identify the general ledger account where the expense is located. If the amount has been determined from contractual arrangements, not from an account item, provide details and evidence of payment.

2. Handling, loading and ancillary expenses

List all charges that are included in the export price and explain how they have been quantified ("**Handling, loading & ancillary expenses**"). Identify the general ledger account where the expenses are located. If the amounts have been determined using actual observations, not from a relevant account item, provide details.

The various export related ancillary costs are identified in the table at question B4, for example:

- terminal handling;
- wharfage and other port charges;
- container taxes;
- document fees and customs brokers fees;
- clearance fees;
- bank charges, letter of credit fees
- other ancillary charges.

3. Credit

The cost of extending credit on export sales is not included in the amounts quantified at question B4. However, the Commission will examine whether a credit adjustment is warranted and determine the amount. Provide applicable interest rates over each month of the investigation period. Explain the nature of the interest rates most applicable to these export sales e.g., short term borrowing in the currency concerned.

If your accounts receivable shows that the average number of collection days differs from the payment terms shown in the sales listing, *and if* export prices are influenced by this longer or shorter period, calculate the average number of collection days. See also item 4 in section E-2 below.

PUBLIC RECORD VERSION

4. Packing costs

List material and labour costs associated with packing the export product. Describe how the packing method differs from sales on the domestic market, for each model. Report the amount in the listing in the column headed 'Packing'.

5. Commissions

For any commissions paid in relation to the export sales to Australia:

- provide a description; and
- explain the terms and conditions that must be met.

Report the amount in the sales listing in question B-4 under the column headed "Commissions". Identify the general ledger account where the expense is located.

6. Warranties, guarantees, and after sales services

List the costs incurred. Show relevant sales contracts. Show how you calculated the expenses ("Warranty & guarantee expenses" and "Technical assistance & other services"), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for the service, repair, or consultation. Where these expenses are closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

7. Other factors

There may be other factors for which an adjustment is required if the costs affect price comparability – these are identified in the column headed "Other factors". For example, other variable or fixed selling expenses, including salesmen's salaries, salesmen's travel expenses, advertising and promotion, samples and entertainment expenses. Your consideration of questions asked at Section G, concerning domestic and export costs, would have alerted you to such other factors.

8. Currency conversions

In comparing export and domestic prices a currency conversion is required. Fluctuations in exchange rates can only be taken into account when there has been a 'sustained' movement during the period of investigation (see article 2.4.1 of the WTO Agreement). The purpose is to allow exporters 60 days to adjust export prices to reflect 'sustained' movements. Such a claim requires detailed information on exchange movements in your country over a long period that includes the investigation period.

E-2 Costs associated with domestic sales

PUBLIC RECORD VERSION

(These cost adjustments will relate to your responses made at question D-4, “domestic sales”)

The following items are not separately identified in the amounts quantified at question D-4. However you should consider whether any are applicable.

1. Physical characteristics

The adjustment recognises that differences such as quality, chemical composition, structure or design, mean that goods are not identical and the differences can be quantified in order to ensure fair comparison.

The amount of the adjustment shall be based upon the market value of the difference, but where this is not possible the adjustment shall be based upon the difference in cost plus the gross profit mark-up (i.e. an amount for selling general and administrative costs (S G & A) plus profit).

The adjustment is based upon actual physical differences in the goods being compared and upon the manufacturing cost data. Identify the physical differences between each model. State the source of your data.

Answer: Not applicable, there are no such physical characteristics differences.

2. Import charges and indirect taxes

If exports to Australia:

- are partially or fully exempt from internal taxes and duties that are borne by the like goods in domestic sales (or on the materials and components physically incorporated in the goods), or
- if such internal taxes and duties have been paid and are later remitted upon exportation to Australia;

the price of like goods must be adjusted downwards by the amount of the taxes and duties.

The taxes and duties include sales, excise, turnover, value added, franchise, stamp, transfer, border, and excise taxes. Direct taxes such as corporate income tax are not included as such taxes do not apply to the transactions.

Adjustment for drawback is not made in every situation where drawback has been received. Where an adjustment for drawback is appropriate you must provide information showing the import duty borne by the domestic sales. (That is, it is not sufficient to show the drawback amount and the export sales quantity to Australia. For example, you may calculate the duty borne on domestic sales by quantifying the total amount of import duty paid and subtracting the duty refunded on exports to all countries. The difference, when divided by the domestic sales volume, is the amount of the adjustment).

PUBLIC RECORD VERSION

In substantiating the drawback claim the following information is required:

- a copy of the relevant statutes/regulations authorising duty exemption or remission, translated into English;
- the amount of the duties and taxes refunded upon *exportation* and an explanation how the amounts were calculated and apportioned to the exported goods;
- an explanation as to how you calculated the amount of duty payable on imported materials is borne by the goods sold *domestically* but is not borne by the exports to Australia;

Substitution drawback systems

Annex 3 of the WTO Agreement on Subsidies provides: *“Drawback systems can allow for the refund or drawback of import duties on inputs which are consumed in the production process of another product and where the export of this latter product contains domestic inputs having the same quality and characteristics as those substituted for the imported inputs”*

If such a scheme operates in the country of export adjustments can also be made for the drawback payable on the substituted domestic materials, provided the total amount of the drawback does not exceed the total duty paid.

Answer: Not applicable, the company didn't have duty drawback and didn't make sales of the goods under consideration to Australia during period of review.

3. Level of trade

Question D-4 asks you to indicate the level of trade to the domestic customer. To claim an adjustment for level of trade differences you will need to quantify the amount by which level of trade influences price.

Trade level is the level a company occupies in the distribution chain. The trade level to which that company in turn sells the goods and the functions carried out distinguish a level of trade. Examples are producer, national distributor, regional distributor, wholesaler, retailer, end user, and original equipment.

It may not be possible to compare export prices and domestic prices at the same level of trade. Where relevant sales of like goods at the next level of trade must be used to determine normal values an adjustment for the difference in level of trade may be required where it is shown that the difference affects price comparability.

The information needs to establish that there are real trade level differences, not merely nominal differences. Real trade level differences are characterised by a consistent pattern of price differences between the levels and by a difference in functions performed. If there is no real trade level differences all sales are treated as being at the same level of trade.

PUBLIC RECORD VERSION

A real difference in level of trade (may be adjusted for using either of the following methods:

- (a) *costs arising from different functions*: the amount of the costs, expenses etc. incurred by the seller in domestic sales of the like goods resulting from activities that would not be performed were the domestic sales made at the same level as that of the importer.

This requires the following information:

- a detailed description of each sales activity performed in selling to your domestic customers (for example sales personnel, travel, advertising, entertainment etc.);
- the cost of carrying out these activities in respect of like goods;
- for each activity, whether your firm carries out the same activity when selling to importers in Australia;
- an explanation as to why you consider that you are entitled to a level of trade adjustment.

or

- (b) *level discount*: the amount of the discount granted to purchasers who are at the same level of trade as the importer in Australia. This is determined by an examination of price differences between the two levels of trade in the exporter's domestic market, for example sales of like goods by other vendors or sales of the same general category of goods by the exporter. For this method to be used it is important that a clear pattern of pricing be established for the differing trade levels. Such pattern is demonstrated by a general availability of the discounts to the level - isolated instances would not establish a pattern of availability.

Answer: Not applicable, there are no differences for pricing between different level of trade, therefore, the company doesn't claim an adjustment for level of trade.

4. Credit

The cost of extending credit on domestic sales is not included in the amounts quantified at question D-4. However, the Commission will examine whether a credit adjustment is warranted and determine the amount. An adjustment for credit is to be made even if funds are not borrowed to finance the accounts receivable.

The interest rate on domestic sales in order of preference is:

- the rate, or average of rates, applying on actual short term borrowings by the company; or
- the prime interest rate prevailing for commercial loans in the country for credit terms that most closely approximate the credit terms on which the sales were made; or
- such other rate considered appropriate in the circumstances.

PUBLIC RECORD VERSION

Provide the applicable interest rate over each month of the investigation period.

If your accounts receivable shows that the average number of collection days differs from the payment terms shown in the sales listing, and if domestic prices are influenced by this longer or shorter period, calculate the average number of collection days.

Where there is no fixed credit period agreed at the time of sale the period of credit is determined on the facts available. For example, where payment is made using an open account system¹, the average credit period may be determined as follows:

1. *Calculate an accounts receivable turnover ratio*

This ratio equals the total credit sales divided by average accounts receivable. (It is a measure of how many times the average receivables balance is converted into cash during the year).

In calculating the accounts receivable turnover ratio, credit sales should be used in the numerator whenever the amount is available from the financial statements. Otherwise net sales revenue may be used in the numerator.

An average accounts receivable over the year is used in the denominator. This may be calculated by:

- using opening accounts receivable at beginning of period plus closing accounts receivable at end of period divided by 2, or
- total monthly receivables divided by 12.

2. *Calculate the average credit period*

The average credit period equals 365 divided by the accounts receivable turnover ratio determined above at 1.

The resulting average credit period should be tested against randomly selected transactions to support the approximation.

Answer: Short-term RMB loan benchmark interest rate is █████% since October 2015, disclosed by People's Bank of China, please refer to the following:

<http://www.pbc.gov.cn/zhengcehuobisi/125207/125213/125440/125838/125888/2968985/index.html>

Normally, customers of the company made payments in rolling payments, didn't claim credit expenses to customers.

¹ Under an open account system, following payment the balance of the amount owing is carried into the next period. Payment amounts may vary from one period to the next, with the result that the amount owing varies.

PUBLIC RECORD VERSION

The following items are identified in the amounts quantified at question D-4:

5. Transportation

Explain how you have quantified the amount of inland transportation associated with the domestic sales (“**Inland transportation Costs**”). Identify the general ledger account where the expense is located. If the amount has been determined from contractual arrangements, not from an account item, provide details and evidence of payment.

Answer: Some domestic sales are made on delivery terms, under which the company will contact Freight agency to arrange transportation to delivered the goods to designated places agreed by both parties. And the company will pay the delivery expenses against invoice issued by Freight agency, therefore, the company reports the delivery expenses based on freight invoices transaction-by-transaction.

6. Handling, loading and ancillary expenses

List all charges that are included in the domestic price and explain how they have been quantified (“**Handling, loading and ancillary Expenses**”). Identify the general ledger account where the expense is located. If the amounts have been determined using actual observations, not from a relevant account item, provide details.

Answer: Not applicable, there are no handling, loading and ancillary expenses incurred for domestic sales.

7. Packing

List material and labour costs associated with packing the domestically sold product. Describe how the packing method differs from sales on the domestic market, for each model. Report the amount in the listing in the column headed “**Packing**”.

Answer: Not applicable, Packing is last process of production, and cost of material and labour are accounted within Cost to make, no separate packing costs are accounted.

8. Commissions

For any commissions paid in relation to the domestic sales:

- provide a description
- explain the terms and conditions that must be met.

Report the amount in the sales listing under the column headed “**Commissions**”. Identify the general ledger account where the expense is located.

Answer: Not applicable, the company didn’t grant commissions.

PUBLIC RECORD VERSION

9. Warranties, guarantees, and after sales services

List the costs incurred. Show relevant sales contracts. Show how you calculated the expenses (“**Warranty & Guarantee expenses**” and “**Technical assistance & other services**”), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for the service, repair, or consultation. Where these expenses are closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

Answer: Not applicable, the company has no expenses like “Warranties, guarantees, and after sales services”

10. Other factors

There may be other factors for which an adjustment is required if the costs affect price comparability – these are identified in the column headed “**Other factors**”. List the factors and show how each has been quantified in per unit terms. For example:

- *inventory carrying cost*: describe how the products are stored prior to sale and show data relating to the average length of time in inventory. Indicate the interest rate used;
- *warehousing expense*: an expense incurred at the distribution point;
- *royalty and patent fees*: describe each payment as a result of production or sale, including the key terms of the agreement;
- *advertising*; and
- *bad debt*.

Answer: Not applicable, there are no other factors.

E-3 Duplication

In calculating the amount of the adjustments you must ensure that there is no duplication.

For example:

- adjustments for level of trade, quantity or other discounts may overlap, or
- calculation of the amount of the difference for level of trade may be based upon selling expenses such as salesperson’s salaries, promotion expenses, commissions, and travel expenses.

Separate adjustment items must avoid duplication.

An adjustment for quantities may not be granted unless the effect on prices for quantity differences is identified and separated from the effect on prices for level of trade differences.

Answer :Well received, no duplications are made in the appendix D-4.

PUBLIC RECORD VERSION

SECTION F – EXPORT SALES TO COUNTRIES OTHER THAN AUSTRALIA (THIRD COUNTRY SALES)

Your response to this part of the questionnaire may be used by the Commission to select sales to a third country that may be suitable for comparison with exports to Australia.

Sales to third countries may be used as the basis for normal value in certain circumstances. The Commission may seek more detailed information on particular third country sales where such sales are likely to be used as the basis for determining normal value.

F-1 Third country sales data

Complete the 'Third country' spreadsheet in the **Exporter Questionnaire spreadsheets – grinding balls** workbook.

This data should be provided on a summary basis.

The below table provides some explanation of the data requested in the Third country spreadsheet.

Column heading	Explanation
Country	Name of the country that you exported like goods to over the investigation period.
Number of customers	The number of different customers that your company has sold like goods to in the third country over the investigation period.
Level of trade	The level of trade that you export like goods to in the third country.
Quantity	Indicate quantity, in units, exported to the third country over the investigation period.
Unit of quantity	Show unit of quantity e.g. kg
Value of sales	Show net sales value to all customers in third country over the investigation period
Currency	Currency in which you have expressed data in column SALES
Payment terms	Typical payment terms with customer(s) in the country e.g. 60 days=60 etc.
Shipment terms	Typical shipment terms to customers in the third country e.g. CIF, FOB, ex-factory, DDP etc.

Answer: Not applicable, the company didn't make exports during period of review.

F-2 Please identify any differences in sales to third countries which may affect their comparison to export sales to Australia.

Answer: Not applicable, there are no such differences.

PUBLIC RECORD VERSION

SECTION G – COSTING INFORMATION AND CONSTRUCTED VALUE

The information that you supply in response to this section of the questionnaire will be used for various purposes including:

- *testing the profitability of sales of like goods on the domestic market;*
- *determining a constructed normal value of the goods under consideration (the goods) – i.e. of the goods exported to Australia; and*
- *making certain adjustments to the normal value.*

You will need to provide the cost of production of both the exported goods (the goods) and for the like goods sold on the domestic market. You will also need to provide the selling, general, and administration costs relating to goods sold on the domestic market; the finance expenses; and any other expenses (e.g. non-operating expenses not included elsewhere) associated with the goods.

In your response please include a worksheet showing how the selling, general, and administration expenses; the finance expenses; and any other expenses have been calculated.

If, in response to question B4 (Sales to Australia, Export Price) you:

- *reported that the date of sale is not the invoice date and consider that this alternative date should be used when comparing domestic and export prices, and*
- *provided information on domestic selling prices for a matching period as required in the introduction to Section D (Domestic Sales)*

you must provide cost data over the same period as these sales even if doing so means that such cost data predates the commencement of the investigation period.

At any verification meeting you must be prepared to reconcile the costs shown to the accounting records used to prepare the financial statements.

G-1. Production process and capacity

1. Describe the production process for the goods. Provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the goods. Also specify all scrap or by-products that result from producing the goods.

Answer: Please refer to Appendix G-1 Production process.

Except for the goods under consideration being two sizes of 40mm & 100mm, the company also produces steel Cylpebs as per illustrated pictures provided being 'not the goods' under consideration. Refer pictures of the 30 x 45 and 40 x 55 sized Cylpebs.

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Scrap steel generated from the production process normally are put into the production for recycle uses or discarded.

G-2. Production capacity data

Complete the 'Production' spreadsheet in the *Exporter Questionnaire spreadsheets – grinding balls* workbook.

Answer: Please refer to Appendix G-2 Production.

G-3. Cost accounting practices

1. Outline the management accounting system that you maintain and explain how that cost accounting information is reconciled to your audited financial statements.

Answer: The company use accounting software to register business activities of the company as following:

1. Cost of production, including purchase of materials and utilities and payroll, Transfer of cost of production and inventory;
2. Sales of goods, including Sales of goods, determination of sales revenues and cost of goods sold etc.
3. SG&A, including administration, selling and financial expenses etc.

All of the above will be registered into accounts of the company, and at the end of each accounting period, the system could generate general ledgers for each account, based on which the accounting system generates the financial statements.

For the flowchart of cost accounting flow, please refer to Appendix G-3.1 Management Accounting System.

The audited financial statements could reconcile general ledgers of the accounting system, and every ledger has subsidiary accounts to register every business of the company with original documents generated for each business, like invoices, payroll list, bank advices etc.

2. Is your company's cost accounting system based on standard (budgeted) costs? State whether standard costs were used in your responses to this questionnaire. If they were state whether all variances (i.e. differences between standard and actual production costs) have been allocated to the goods - and describe how those variances have been allocated.

Answer: The electricity is allocated according to standard consumption.

Firstly, workshop estimated unit standard electricity consumption for different products; Secondly, the company calculated standard consumption with actual quantity, then, total consumption will be allocated according to total standard electricity consumption.

PUBLIC RECORD VERSION

- 3 Provide details of any significant or unusual cost variances that occurred during the investigation period.

Answer: Not applicable, there are no such cost variances.

- 4 Describe the profit/cost centres in your company's cost accounting system.

Answer: Not applicable, the company doesn't use profit centres or cost centres, the company has only one workshop, all expenses are accounted to the workshop.

- 5 For each profit/cost centre describe in detail the methods that your company normally uses to allocate costs to the goods under consideration. In particular specify how, and over what period, expenses are amortised or depreciated, and how allowances are made for capital expenditures and other development costs.

Answer: Not applicable, the company doesn't use profit centres or cost centres, the company has only one workshop, all expenses are accounted to the workshop.

- 6 Describe the level of product specificity (models, grades etc.) that your company's cost accounting system records production costs.

Answer: The company is a small workshop, which only accounts cost for different products, [REDACTED] (Product cost specificity)

- 7 List and explain all production costs incurred by your company which are valued differently for cost accounting purposes than for financial accounting purposes.

Answer: Not applicable, there are no such production costs which are valued differently for cost account purposes than for financial accounting purposes.

- 8 State whether your company engaged in any start-up operations in relation to the goods under consideration. Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.

Answer: Not applicable, there are no start-up operations for the Company during review period.

- 9 State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.

Answer: Not applicable, there are no start-up operations for the Company during review period.

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G-4 Cost to make and sell on domestic market

This information is relevant to testing whether domestic sales are in the ordinary course of trade.²

Complete the 'Domestic CTMS' spreadsheet in the *Exporter Questionnaire spreadsheets – grinding balls* workbook.

- Please provide the actual unit cost to make and sell **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.
- Provide this cost data for each quarter over the investigation period. If your company calculates costs monthly, provide monthly costs.
- Indicate the source of cost information (account numbers etc.) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.
- Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.
- If you are unable to supply this information in this format, please contact the case officer for this investigation at the address shown on the cover of this questionnaire.
- Please specify unit of currency.
- Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.
- In calculating the unit cost to make and sell, provide an explanation if the allocation method used (e.g. number, or weight etc.) to determine the unit cost differs from the prior practice of your company.
- Supply your Bill of Materials **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.

Answer: Please see the following:

The unit of currency is RMB.

The company is a small and new producer; therefore, it doesn't have ability to maintain complex costing accounting system, in normal accounting practice.

² *The Commission applies the tests set out in s.269TAA of the Customs Act 1901 to determine whether goods are in ordinary course of trade. These provisions reflect the WTO anti-dumping agreement – see Article 2.2.1.*

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The company has only one production line for cast grinding balls of only two sizes, 40mm & 100mm from 'scrap' metal being iron shavings. The company has provided the quarterly cost to make and sell for each size cast grinding ball [REDACTED] the cost to make for each size has a cost differential of around [REDACTED] rmb or [REDACTED]%;(Comment on cost allocation)

- please refer to revised Appendix G-4 Domestic CTMS.

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G-5 Cost to make and sell goods under consideration (goods exported to Australia)

The information is relevant to calculating the normal values based on costs. It is also relevant to calculating certain adjustments to the normal value.

Answer: This section is not applicable, the company never made sales to Australia.

Complete the 'Australian CTMS' spreadsheet in the ***Exporter Questionnaire spreadsheets – grinding balls*** workbook.

- Please provide the actual unit cost to make and sell **separately for each model/type** (identified in section C) of the goods sold to Australia.
- Provide this cost data for each quarter over the investigation period. If your company calculates costs monthly, provide monthly costs.
- Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.
- Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.
- If you are unable to supply this information in this format, please contact the case officer for this investigation at the address shown on the cover of this questionnaire.
- Please specify unit of currency.
- Where there are cost differences between goods sold to the domestic market and those sold for export, give reasons and supporting evidence for these differences.
- Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.
- In calculating the unit cost to make and sell, provide an explanation if the allocation method used (e.g. number, or weight etc.) to determine the unit cost differs from the prior practice of your company.
- Supply your Bill of Materials **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.

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G-6 Major raw material costs

List major raw material costs, which individually account for 10% or more of the total production cost.

For these major inputs:

- identify materials sourced in-house and from associated entities;
- identify the supplier; and
- show the basis of valuing the major raw materials in the costs of production you have shown for the goods (e.g. market prices, transfer prices, or actual cost of production).

Where the major input is produced by an associate of your company the Commission will compare your purchase price to a normal market price. If the associate provides information on the cost of production for that input such cost data may also be considered.

Normal market price is taken to be the price normally available in the market (having regard to market size, whether the input is normally purchased at 'spot prices' or under long term contracts etc.).

The term associate is defined in section 269TAA of the *Customs Act*. Included in that definition are companies controlled by the same parent company (a company that controls 5% or more of the shares of another is taken to be an associated company); companies controlled by the other company; and companies having the same person in the board of directors.

Important note: If the major input is sourced as part of an integrated production process you should provide detailed information on the full costs of production of that input.

Answer: Major material used in the production of the goods under consideration waste steel being iron shavings, which are purchased from other unrelated companies, and cost of raw materials are weighted average prices of inventory for materials.

Comparative Material prices for the production of cast grinding balls for the POR has been supplied

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SECTION H – PARTICULAR MARKET SITUATION

The applicants claim that a ‘market situation’ exists in respect of grinding balls from China due to government influence on both the prices of the goods and the major raw material inputs used in the manufacture of the goods.

The existence of a ‘market situation’ could affect the Commission’s approach to calculating normal value within its dumping assessment.

In broad terms, it is generally the case that the normal value of the goods is the price paid for like goods sold for home consumption in the country of export. One of the exceptions to using domestic selling prices for this purpose provides that the domestic selling prices are not an appropriate basis for normal value if the Minister is satisfied that a situation in the market has rendered domestic selling prices unsuitable for establishing normal values (i.e. a ‘particular market situation’ exists).

One of these situations may be where the domestic selling prices in the country of export have been materially affected by government influence rendering those prices unsuitable for use in establishing normal values.

Through this questionnaire, the Commission is providing producers/exporters of the subject goods in China the opportunity to supply evidence that the sector under investigation is operating under market conditions. In examining the matter, the Commission will also send questionnaires to the Government of China and continue to examine information available from third-party sources.

It may be necessary for the Commission to request additional information following receipt and review of your response.

There are three parts to this section:

PART H-1 - Requests information concerning the organisation of your company and the Government of China’s involvement in the business of your company.

PART H-2 - Requests information concerning the Government of China’s measures with respect to the steel industry in China.

PART H-3 - Requests information concerning the grinding balls sector in the region where your company is located.

H-1 GENERAL INFORMATION

The information requested in this part will provide an overview of your corporate organisation and the Government of China’s involvement in your business. In addition to your response to each of the questions, all necessary supporting documentation is requested.

- 1. Specific questions are asked throughout this questionnaire in relation to the Government of China’s interaction with your businesses.**

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However, please generally describe all interaction that your business has with the Government of China at all levels, including (but not limited to):

- a) reporting requirements;
- b) payment of taxes;
- c) senior management representation within your business;
- d) supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC.
- e) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions);
- f) licensing;
- g) restrictions on land use;
- h) provision of loans; or
- i) provision of grants, awards or other funds.

Answer: Generally speaking, the company is a small private company which doesn't have reporting requirements to Chinese government, and there is no senior management representation within the company from the government, business of the company is not supervised by the SASAC or a body under the control of SASAC. The company makes any business decisions on its own, without soliciting opinions from government, and the company never received any loans or grants from government or any public bodies.

But the company must apply registry and pay taxes according to Chinese corporation laws or relevant regulations.

2. Business structure, ownership and management

- a) Indicate whether your company is a state-owned or state-invested enterprise (SIE) (refer to the Glossary of Terms for definition).

Answer: Not applicable, the company is a private company.

- b) List the Board of Directors and Board of Shareholders of your business and all other entities/businesses your business is related to.

Indicate the names of common directors and officers between yours and related businesses, where applicable.

Answer: Please refer to the following:

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- c) Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders representatives, employees, or otherwise affiliated with the Government of China (at any level, from any agency, party, or otherwise associated entity, including SASAC)?

If so, identify the individuals, their role on that Board and their affiliation with the Government of China.

Answer: Not applicable, the company is a private company.

- d) Does your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders have a representative from the Chinese Communist Party (CCP)? If so, identify their name and title and indicate their position at the board level.

Answer: Not applicable, the company is a private company.

- e) Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders appointed, managed or recommended by the Government of China? If so, identify any relevant government department(s) they are affiliated with.

Answer: Not applicable, the company is a private company.

- f) Indicate who owns what percentage of all shares in your business and identify whether they are:

- an affiliate, representative, agency or otherwise representative of the Government of China;
- employees of your business;
- foreign investors; or
- other (please specify).

Answer: Not applicable, the company is a private company.

- g) Provide the details of any significant changes in the ownership structure of your business during the investigation period.

Answer: Not applicable, there are no significant changes in the ownership structure of the company during the investigation period.

- h) Identify any positions within your business that are appointments or designated to act on behalf of Government of China authorities.

Answer: Not applicable, the company is a private company.

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- i) Explain whether there are requirements in law and in practice to have government representation at any level of your business. If there is such a requirement, explain the role of government representatives appointed to any level of your business.

Answer: Not applicable, the company is a private company.

- j) If your business is a publicly-traded company, what are the rules regarding the issuance of shares by your business? Identify any stock exchanges on which your business is listed.

Answer: Not applicable, the company is not publicly-traded company.

- k) Provide the monthly trading volume and average monthly trading price of your listed security between 1 April 2017 to 31 March 2018.

Answer: Not applicable, the company is not publicly-traded company.

- l) Who has the ability to reward, fire or discipline your business' senior managers?

Answer: Mr. Ming Yang, the chairman of the board has the ability to reward, fire, or discipline senior managers of the company.

- m) Do any of your company's senior managers hold positions in any Government of China departments or organisations, associations or Chambers of Commerce? If so describe the nature of these positions.

Answer: Not applicable, the company is not publicly-traded company.

- n) Provide the names and positions of your company's pricing committee.

Answer: The company doesn't have pricing committee, prices are determined by Manager of sales department and approved by Chairman of the board.

3. Licensing

- a) Provide a copy of your business license(s).

Answer: Please refer to Appendix H-1.3 Business License.

- b) Identify the Government of China departments or offices responsible for issuing the license(s).

Answer: Ningguo Market Supervision and Administration Bureau.

- c) Describe the procedures involved in applying for the license(s).

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Answer: Normal procedure for applying the license:

1. Applying preapproval of Company name to government;
2. Renting a house as company address;
3. Submitting Articles of Association for the company;
4. Claiming Letter of bank inquiry from CPA;
5. Opening bank account of the company;
6. Claiming Capital verification report;
7. Registering company before government;

- d) Describe any requirements or conditions that must be met in order to obtain the license(s).

Answer: No requirements or conditions must be met in order to obtain the license, provided that the company follows steps introduced above.

- e) Describe and explain any restrictions imposed on your business by the business license(s).

Answer: The company could operate under business scope indicated in the Business license, please refer to Appendix H-1.3 Business License.

- f) Describe any sanctions imposed on your business if you act outside the scope of your business license(s).

Answer: If the company acts outside the scope of business license, the registration authority shall caution, impose a fine, confiscate illegal gains, order the company to stop doing business for internal rectification, withhold or even revoke the business license according to specific circumstances. Of course, we could apply for adding the business scope, then we could act according to the new business scope.

- g) Describe and explain any rights or benefits conferred to your business under the license(s).

Answer: Under the business license, the company could operate legally. In China, if someone do business without a business license, the department of administration for industry and commerce will ban it and confiscate illegal gains.

- h) Describe the circumstances under which your business license(s) can be revoked, and who has the authority to revoke the license(s).

Answer: The business license could be revoked under the following circumstances:

- (1) The company is declared bankrupt as provided by law;**

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- (2) pursuant to the provisions of the company's articles of association, the term of operation of the company expires, or one of the other events which are grounds for dissolution occurs;
- (3) A resolution of dissolution is passed by the shareholders;
- (4) dissolution is necessary due to a merger or division of the company; or
- (5) the company is ordered to close down in accordance with law.

4. Decision-making, planning and reporting

- a) Provide a description of your business' decision-making structure in general and in respect of steel products. This should identify the persons or bodies primarily responsible for deciding:
 - (i) what goods are produced;
 - (ii) how the goods are produced;
 - (iii) how levels of inputs such as raw materials, labour and energy are set and secured;
 - (iv) how the use of your outputs, such as how your product mix is determined; and
 - (v) how your business' profit is distributed, etc., is determined.

Answer: The company is liability company, owned by [REDACTED] and Board of directors are responsible for the company's management and material development strategy.(Nature of ownership)

- b) Provide a description of any Government of China input into the decision-making process respecting your manufacture, marketing and sale of steel products.

Answer: Not applicable, the company is a small private company, none of any levels of government of China are involved in the company's business or management.

- c) Provide a list of all government departments/offices that are involved, either directly or indirectly, in your manufacture, sale or purchase of steel products.

Answer: Not applicable, the company is a small private company, none of any levels of government of China are involved in the company's business or management.

- d) List and describe all reports that must be submitted to the Government of China periodically by your company and identify the government department/office where each report is filed.

Answer: Not applicable, the company is a small private company, none of any levels of government of China are involved in the company's business or management.

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- e) Provide a copy of the last two Provincial/City Five Year Plans (including the appendices) for the province/city in which your business is located, whichever is applicable. The copies should be fully translated including the appendices, along with the original Chinese version.

Answer: Not applicable, the company is a small private company, which doesn't have such documents.

- f) Does your business develop any five-year plans or similar planning documents? If so, provide copies of these plans and advise whether these plans have been submitted, reviewed or approved by the Government of China (including the National Development and Reform Commission).

Answer: Not applicable, the company doesn't have such plans.

- g) Provide copies of the minutes of your Board of Directors and Board of Shareholders meetings over the investigation period.

Answer: Not applicable, the company didn't hold meetings of Board of directors or Board of shareholders over the investigation period.

- h) Provide copies of the notes to company meetings where pricing decisions on steel products have been made over the investigation period.

Answer: Not applicable, there are no such meetings to make pricing decisions on steel products, prices are negotiated friendly with clients, subject to approval of Manager of sales department and Chairman of the Board.

5. Financial and investment activities

- a) How is your business debt funded? Provide a list of all major lenders.

Answer: Not applicable, the company has no debts.

- b) What is the rate of interest paid by your business on all debt instruments over the last 5 years?

Answer: Not applicable, the company has no debts.

- c) Has your business benefited from any concessional interest rates for your loans/debts in the last 5 years? If so, provide details.

Answer: Not applicable, the company has no debts.

- d) Has your business raised any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, subordinate loans or any other debt and/or equity instruments in the last 5 years? If so:

(i) explain what instruments were used;

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- (ii) identify the type (e.g. government guarantee) and provider of the security; and
- (iii) explain the reasons for raising the capital.

Answer: Not applicable, the company didn't raise any capital using ways described in the question.

- e) Does your business have policies on how cash reserves are to be invested? If so, provide details.

Answer: Not applicable, the company has no such policies.

- f) Has your business invested in either government or non-government debt securities (such as bonds, quasi-government bonds)? If so provide details (e.g. type of instrument, amount invested and the expected rate of return).

Answer: Not applicable, the company didn't make such investments.

H-2 GOVERNMENT OF CHINA MEASURES IN THE IRON AND STEEL SECTOR

The information requested in this part will allow for a better understanding of the Government of China's measures in respect of iron and steel in China, in addition to your response to each of the questions, all necessary supporting documentation is requested.

1. Are there any other Government of China opinions, directives, decrees, promulgations, measures, etc. concerning the iron and steel industry/sector that were put in place or operating during the investigation period; for example but not limited to, the National Steel Policy (NSP), the Blueprint for the Steel Industry Adjustment and Revitalization and the Directory Catalogue on Readjustment of Industrial structure?

If yes, please provide a copy of that documentation and a translation as well. Also provide documentation concerning the Government of China or any association of the Government of China's notification of the measures concerning steel to your company over the investigation period.

Answer: The company is a small private company which has no access to such information.

2. Provide information concerning the name of any Government of China departments, bureaus or agencies responsible for the administration of all Government of China measures concerning the steel industry in the regions, provinces or special economic zones where your company is located.

Ensure that your response includes contact information regarding the following areas:

- industrial policy and guidance on the steel industry sector;

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- market entry criteria for the steel industry sector;
- environmental enforcement for the steel industry sector;
- management of land utilization;
- the China Banking Regulatory Commission for the steel industry sector;
- investigation and inspection of new steel expansion facilities;
- the section in the National Development and Reform Commission that is responsible for the steel industry sector; and
- import licensing for iron ore, steel and other steel raw materials.
- **Answer: The company is a small private company which has no access to above information.**

3. National Steel Policy

The Commission is aware of the 2005 *National Steel Policy* (also referred to as the Steel and Iron Industry Development Policy, as well as by several other titles). The following questions relate to that policy.

- a) Explain in detail how the policy and any updates regarding the policy were communicated to your company.

Answer: The company is a small private company which has no access to such information.

- b) Identify the government department, association, or company official that communicated this policy or any related measures, to your company as well as the government office or association and the names of the officials who are responsible for the administration of this policy.

Answer: The company is a small private company which has no access to such information.

- c) Explain in detail the information that has been provided to you from official and unofficial channels concerning action to be taken by your company in relation to the policy.

Answer: The company is a small private company which has no access to such information.

- d) Do you have designated officials that have provided direction to your company regarding the Government of China's measures and how to proceed with your current project or future plans within the scope of the policy?

Answer: Not applicable, the company didn't receive any direction regarding Government of China's measure.

- e) Explain in detail if there are additional directives or measures from the Government of China that have been communicated to your company, since the inception of the policy.

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Answer: Not applicable, there are no such additional directives or measures.

- f) Explain in detail whether the policy has ever impacted your company's investment plans. This may include reference to specific measures considered or taken by your company to address issues and/or objectives raised by the policy. Such items may include but are not limited to items such as project approval process, credit and loans (including discounted interest payments), the environment, the scale of production, energy use, raw material inputs etc.

Answer: Not applicable, there are no such policies that have ever impacted investment plans of the company.

- g) Explain the ongoing mechanism used by the Government of China to measure your company's compliance with the policy directives and/or guidelines.

Answer: Not applicable, as far as the company's knowledge, there are no such ongoing mechanisms.

- h) The policy includes directives and/or guidelines that permit authorities to limit the supply of water, power, land and bank loans etc. to steel producers, which do not meet the objectives of the policy.

- Explain in detail whether your company's expansion or investment plans have ever been or may be impacted by these criteria.
- Explain the procedure to be followed by a steel company in making a request for approval of a steel investment for an existing steel enterprise or new steel enterprise.
- Identify any Government of China bodies at the regional or provincial level that have the responsibility to grant the approval, or refuse approval regarding an investment in the steel sector.
- Are review and approval decisions regarding investments in the steel sector made by the central government or are they delegated to the regional or provincial level?

Answer: Not applicable, the company has no access to such directives and/or guidelines.

- i) Describe the role of the National Development and Reform Commission in terms of communicating, implementing and overseeing policies governing the steel sector, including but not limited to, China's National Steel Policy.

Answer: Not applicable, as a small private company, Sanfang doesn't know how National Development and Reform Commission communicates, implements or oversees policies.

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4. Other government approvals

The below questions address the approvals that are necessary from various Government of China agencies, including the National Development and Reform Commission, in order to continue or initiate steel investments.

- a) Explain whether your company has undertaken an approval process through the Government of China for any steel investments in the last 10 years.

Answer: It is confirmed that the company didn't undertake approval process through the Government of China for any steel investments in the last 10 years.

- b) Explain whether any applicable investments received the necessary approval and if so, provide documentation confirming this approval.

Answer: Not applicable, as far the company's knowledge, there are no such investments and approvals.

- c) If your investment was not approved, provide the reasons given for the refusal.

Answer: Not applicable, as far the company's knowledge, there are no such investments and approvals.

- d) Describe the process your company has to follow to obtain these approvals.

Answer: Not applicable, as far the company's knowledge, there are no such investments and approvals.

- e) Provide a translated copy of the application form along with the original Chinese version.

Answer: Not applicable, as far the company's knowledge, there are no such investments and approvals.

- f) Identify the office that sent communication of these requirements to your company along with the office address, contact names, phone numbers and fax numbers.

Answer: Not applicable, as far the company's knowledge, there are no such investments and approvals.

5. The restructure of the iron and steel industry in China

The Commission is aware of the GOC's *Guidelines on tackling severe overcapacity problem*. The following questions relate to these guidelines:

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- a) Explain in detail if there were any directives or measures from the GOC that have been communicated to your business since the inception of these guidelines?

Answer: Negative, the company is a small private company, and didn't receive any directives or measures from GOC.

- b) Identify the Government department, association or company official that communicated these guidelines or any related measures to your business.

Answer: Not applicable, the company didn't receive or communicate guidelines to the business.

- c) Identify the Government department, association or company and names of officials who are responsible for the administration of these guidelines.

Answer: Not applicable, the company didn't receive or communicate these guidelines.

- d) Explain in detail how these guidelines have or might impact on your business. This may include reference to specific measures considered or taken by your business. Such items may include but are not limited to items such as project approval process, credit and loans terms (including any preferential interest rates), the environmental issues, discounted rate of energy and raw materials (iron and steel, pre-alloyed product etc.).

Answer: Not applicable, the company is a small private company, didn't receive impact from these guidelines.

- e) Explain any on-going mechanism used by the GOC to measure your business compliance with the policy directives and/or guidelines.

Answer: Not applicable, as far as the company's knowledge, there are no such on-going mechanism.

H-3 THE GRINDING BALLS SECTOR

The information requested in this part will assist in providing a better understanding of the Government of China measures and your business' sales and production of grinding balls.

In addition to your narrative response to each of the questions, all necessary supporting documentation is requested.

1. Export quotas and licensing

- a) Are grinding balls sold by your company subject to any export quotas? If so, explain why grinding balls are subject to quotas and the method by which the quotas are allocated.

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Does this process involve any Government of China participation in determining the selling prices of the goods? If so, explain.

Answer: Not applicable, grinding balls are not subject to any export quotas.

And Government of China also didn't participate in determining the selling prices of the goods.

b) If grinding balls are not presently subject to export quotas, indicate if quotas existed during the investigation period and when and why they were removed.

Answer: As far as the company's knowledge, grinding balls has never been subject to export quotas.

c) Identify which Government of China agency legislates and monitors any such quotas.

Answer: Not applicable.

d) Has the Government of China set any targets or limits regarding the quantity of grinding balls that you may sell on the domestic or export markets? If so, provide details.

Answer: Negative.

e) Are there any export licence requirements for grinding balls? If so, provide details.

Answer: Negative, there are no export license requirements for grinding balls.

2. Taxation

a) Were there any export taxes on the exports of grinding balls during the investigation period?

Answer: Negative, exports of grinding balls are exempt from export taxes.

b) What was the VAT rebate applicable to grinding balls exports during the investigation period?

Answer: VAT rebate applicable to grinding balls exports 5% during the investigation period.

c) Have there been any changes to the value-added tax rebate applicable to steel exports in the last 5 years? If yes, provide:

(i) a detailed chronological history of the value-added tax rebate rates;

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- (ii) products affected;
- (iii) the effective dates of the rate changes;
- (iv) fully translated copies of any Government of China notices regarding these changes, including the relevant appendices.

Answer: As far as the company's knowledge, VAT rebate didn't change in the last 5 years.

- d) Please provide details of any taxes and tariff (rates and rebates) applicable to coking coal and coke as well as iron ore and scrap steel.

Answer: VAT for sales of coking coal and coke is 17%, and there are no VAT rebates on exports of coking coal and coke.

- e) Are you aware of any tax changes being planned that would impact the grinding balls sector?

Answer: Negative, the company are not aware of any tax changes.

3. Sales terms

- a) Identify the person who authorises the sales terms, prices and other contract provisions for the sale of grinding balls by your business.

Answer: Chairman of the board is the person authorizing sales terms, prices and other contract provisions.

- b) Explain how the selling prices of grinding balls by your business are determined, including any Government of China involvement in your business' pricing decisions, and indicate if the goods are subject to Government of China direct or indirect pricing or government guidance pricing.

Answer: Selling prices of grinding balls are negotiated between the company and the clients, normally salesman first negotiate prices with the clients, and final prices are subject to approval of chairman.

- c) Does your business coordinate the selling prices or supply of grinding balls with other domestic steel and steel product producers, any Government of China departments, or the China Iron and Steel Association? If so, provide details.

Answer: Not applicable, the company doesn't coordinate the selling prices or supply of grinding balls with other domestic steel and steel product producers any Government of China departments, or the China Iron and Steel Association.

- d) Explain whether your business provides grinding balls price information/data to the Government of China, the China Iron and Steel Association (CISA), other government officials or commercial/industry

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organisations, including those outside of China, which report on the steel sector.

Answer: Not applicable, the company doesn't provide grinding balls price information to the Government of China and Steel Association (CISA), other government officials or commercial/industry organisations, including those outside of China.

- e) Explain whether your business provides grinding balls price data to any other person at the provincial, regional or special economic zone level of government.

Answer: Not applicable, the company doesn't provide grinding balls data to any other person at the provincial, regional or special economic zone level of government.

4. Industry associations

- a) Is your business a member of CISA or regional Iron & Steel Associations? If so, explain your business' relationship with the association and the involvement of the Government of China with the associations.

Answer: Negative, the company is not a member of CISA or regional Iron & Steel Associations.

- b) If your business is a member of an industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the GOC concerning the iron and steel industry.

Answer: Negative, the company is not a member of CISA or regional Iron & Steel Associations.

5. Other industry associations

- a) Is your business a member of any other industry associations? If so, explain your business' relationship with the association and the involvement of the Government of China with the association.

Answer: Negative, the company is not a member of any other industry associations.

- b) If your business is a member of another industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the Government of China concerning the steel industry.

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Answer: Negative, the company is not a member of any other industry associations.

6. Statistics submission/recording

- a) Indicate if your business makes submissions³ to the Chinese Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.

Answer: The company is a small private company, which doesn't make submissions to the Chinese Bureau of statistics and/or any other government organisation.

- b) Provide a recent example of a submission that has been made to the Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.

Answer: The company is a small private company, which doesn't make submissions to the Chinese Bureau of statistics and/or any other government organisation.

- c) Do the organisations approve or assess your submission? If yes, provide a detailed explanation.

Answer: The company is a small private company, which doesn't make submissions to the Chinese Bureau of statistics and/or any other government organisation.

- d) Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.

Answer: The company is a small private company, which doesn't make submissions to the Chinese Bureau of statistics and/or any other government organisation.

7. Manufacturing inputs

- a) Is there a price difference in purchase price for raw materials (i.e. coking coal, coke, iron ore and scrap steel or other raw material) between your suppliers?

Answer: Different suppliers have different prices for raw materials.

- b) Is there a price difference between purchase price of raw materials from SIEs/SOEs and non-SIEs/SOEs? Provide explanation.

Answer: Prices are market-oriented prices, which has no relationship with what the company is, SIEs/SOEs or non-SIEs/SOEs.

³ For example, monthly data relating to sales, production and costs.

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- c) If your supplier is based outside China, what import duty rate is applied on the raw materials (i.e. iron and steel or other raw material)?

Answer: Not applicable, no suppliers is based outside China.

- d) Does your business benefit from any concession on the purchase of any utility services (e.g. electricity, gas, etc.)? If so explain the nature and the amount of the concession?

Answer: Not applicable, the company doesn't benefit from any concession on the purchase of any utility services.

8. Regional differences

- a) If you have production facilities in more than one region/province, are the laws and regulations in each region the same with respect to pricing? Provide details on any regional differences.

Answer: Not applicable, the company has only one production facility.

9. Grinding balls production/output during the investigation period

- a) Is any part of your production of grinding balls subject to any national/regional industrial policy or guidance? If so, provide details including a background of the policy/guidance and explain any restriction imposed by the policy/guidance.

Answer: Not applicable, the company is a private company which determine the production by itself.

- b) To what extent are any of the policies/guidelines identified in a) applicable to your business?

Answer: Not applicable, there are no such policies.

- c) Where applicable, how did your business respond to the policies/guidelines?

Answer: Not applicable.

- d) Provide details regarding any other restrictions (e.g., geographic/regional, downstream, use, etc.) to the sale of grinding balls that may be imposed by the Government of China.

Answer: Not applicable, there are no such restrictions to sale of grinding balls.

- e) Provide a list of all your domestic customers of the goods, include the location (city and province) of the customer and indicate whether each customer is a SIE.

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Answer: Please refer to Appendix D-4, and no customers are SIEs as far as the company's knowledge.

- f) Are there any restrictions and/or conditions in relation to the quality or quantity of the production of the goods placed upon your business? If so, provide details.

Answer: Not applicable, there are no such restrictions and/or conditions.

- g) Does your business require an export licence? If so, provide details.

Answer: Not applicable, there are no export license, while Chinese company needs to apply Record Form for Foreign Trade Company for making imports of exports.

- h) Are the goods sold by your business subject to any export restrictions and/or limits during the previous 5 years? If so, provide details.

Answer: Not applicable, there are no such export restrictions.

- i) Provide details regarding any other restrictions (e.g., geographic/regional, downstream, end use) placed upon your business on the sale of the goods.

Answer: Not applicable, there are no other restrictions.

- j) Have there been any changes to your production capacity of the goods over the last 5 years? If so, provide details.

Answer: Not applicable, there are no changes to the company's production capacity over the last 5 years.

10. Sales price during the investigation period

- a) Explain whether your business has been subjected to any direct or indirect price guidance or controls by the GOC during the investigation period, with respect to domestic iron and steel prices.

Answer: Not applicable, the company has never been subjected to any direct or indirect price guidance or controls by GOC during the investigation period with respect to domestic iron and steel prices.

- b) Explain whether your business has been subjected to any direct or indirect price guidance or controls by the GOC during the investigation period, with respect to raw material inputs (i.e. iron and steel, etc.).

Answer: Not applicable, the company has never been subjected to any direct or indirect price guidance or controls by GOC during the investigation period with respect to raw material inputs.

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- c) Explain whether your business has encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.

Answer: Not applicable, the company has never encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.

- d) Describe in detail how the selling price of the goods is determined. In particular, provide details of any restrictions, limitations, or other considerations imposed on your business.

Answer: Selling prices of grinding balls are negotiated between the company and the clients, normally salesman first negotiate prices with the clients, and final prices are subject to approval of chairman. Prices are affected by the material prices, supplying and demanding for the goods in the markets.

- e) Which organisation/business entity do you consider as the price leader of the goods?

Answer: Not applicable, there are no price leader of the goods.

- f) Does your business have a pricing committee in respect of the goods? If so provide the names and positions of all members of the Committee.

Answer: The company is a small private company, there are no pricing committee in respect of the goods. Prices are determined and approved by sales department and chairman of the board.

- g) How often does the pricing committee meet to discuss selling prices of the goods? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the investigation period.

Answer: The company is a small private company, there are no pricing committee in respect of the goods. Prices are determined and approved by sales department and chairman of the board.

- h) Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.

Answer: Chairman of the board is the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.

- i) If you have production facilities of the goods in more than one region and/or province, are the laws and regulations in each region the same with respect to pricing of the goods? If not, provide details on the differences.

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Answer: Not applicable, the company has only one production facility.

11. Adding capacity and/or joint ventures

- a) Provide a detailed explanation with respect to the government approval process on adding capacity and/or joint ventures in relation to your business.

Answer: Not applicable, there are no government approval on adding capacity and/or joint ventures in relation to the company.

- b) Does the government have the right to request modifications in the terms of adding capacity and/or joint ventures? If yes, provide a detailed explanation.

Answer: Not applicable, the company has full rights to add capacity and/or joint ventures.

12. Steel billet or grinding bar (Purchased)

Only answer the following questions if your business, or related businesses, purchase steel billet or grinding bar

Answer: Following questions are not applicable, since the company doesn't purchase steel billet or grinding bar.

- a) Provide a detailed listing of your steel billet (or grinding bar) purchases by completing the 'Steel Billet/Grinding Bar Purchases' tab of the attached spreadsheet.
- b) Do you have more than one supplier of steel billet or grinding bar? If so, provide an explanation of the reasons of price differences between these suppliers?
- c) Describe in detail your business' purchase procedures of steel billet (or grinding bar) and the considerations in selecting a supplier. If it is by tenders, provide details of the criterions/conditions.
- d) If steel billet or grinding bar is imported by your business, or related businesses:
- (i) Provide details including a description of the steel billet or grinding bar imported, the chromium range (%), the supplier and country of origin.
 - (ii) Explain the process required to steel billet (e.g. obtaining an import licence, import declarations).
 - (iii) Provide details of any conditions to importing the steel billet or grinding bar (e.g. customs and/or quarantine).
 - (iv) Is your business eligible for a duty drawback? If so, provide details.

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- e) Do you have more than one supplier of the raw materials? If so, provide an explanation of the reasons of price differences between these suppliers?
- f) Describe in detail your business' purchase procedures of the raw materials and the considerations in selecting a supplier. If it is by tenders, provide details of the criterions/conditions.
- g) If any of your raw materials for the production of billet, grinding bar or grinding balls are imported by your business, or related businesses:
 - (i) Provide details including a description of the raw material imported, the supplier and country of origin.
 - (ii) Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
 - (iii) Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
 - (iv) Are you eligible for a duty drawback? If so, provide details.

13. Steel billet (Sales)

Only answer the following questions if your business, or related businesses, sell steel billet

Answer: Following questions are not applicable, since the company doesn't sell steel billet.

- a) Sales and production
 - (i) Provide a list of all your domestic customers of steel billet and indicate whether each customer is an SIE.
 - (ii) Are you required to obtain approval or a licence to sell steel billet? If so, provide details.
 - (iii) Are there any restrictions and/or conditions in relation to the quality or quantity of the production of steel billet placed upon your business? If so, provide details.
 - (iv) Do you have an export licence for exports of steel billet? If so, provide details.
 - (v) Is steel billet sold by your business subject to any export restrictions and/or limits during the previous 5 year? If so, provide details.
 - (vi) Provide details regarding any other restrictions (e.g. geographic/regional, downstream, end use) placed upon your business on the sale of steel billet.
 - (vii) Have there been any changes to your production capacity of steel billet over the last 5 years? If so, provide details.
- b) Selling price
 - (i) Describe in detail how the selling price of steel billet is determined. In particular, provide details of any restrictions, limitations, or other considerations faced by your business.
 - (ii) Which organisation/business entities do you consider as the price leader of steel billet?

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- (iii) Does your business have a pricing committee in respect of steel billet? If so provide the names and positions of all members of the Committee.
- (iv) How often does the pricing committee meet to discuss selling prices of steel billet? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the investigation period.
- (v) Identify the person who authorises the sales terms, prices and other contract provisions for the sale of steel billet by your business.
- (vi) If you have production facilities of steel billet in more than one region and/or province, are the laws and regulations in each region the same with respect to pricing of steel billet? If not, provide details on the differences.
- (vii) If you have customers of steel billet located in more than one region and/or province, are the selling prices of these products different? If so, explain the reasons on the differences.

14. Raw material purchases

Only answer the following questions if your business, or related businesses, manufacture steel billet

Answer: Following questions are not applicable, since the company doesn't manufacture steel billet.

- a) Provide a detailed listing of your raw material purchases (e.g. iron ore, steel scrap, coking coal, lime) by completing the Raw Material Purchases tab of the attached spreadsheet).
- b) Do you have more than one supplier of the raw materials? If so, provide an explanation of the reasons of price differences between these suppliers?
- c) Describe in detail your business' purchase procedures of the raw materials and the considerations in selecting a supplier. If it is by tenders, provide details of the criteria/conditions.
- d) If any of your raw materials for the production of steel billet or grinding bar or grinding balls are imported by your business, or related businesses :
 - (i) Provide details including a description of the raw material imported, the supplier and country of origin.
 - (ii) Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
 - (iii) Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
 - (iv) Are you eligible for a duty drawback? If so, provide details.

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SECTION I - COUNTERVAILING (SUBSIDISATION)

The applicant alleges that producers in China of grinding balls have benefited from a number of subsidies granted by the Government of China (meaning any level of government – refer to the Glossary of Terms for further information), and that these subsidies are countervailable.

INVESTIGATED PROGRAMS

The following are programs that the Commission is currently investigating:

Program Number	Program Name	Program Type
1	Raw Materials (Steel billet) Provided by the Government at Less than Fair Market Value	Provision of goods
2	Raw Materials (Electricity) Provided by the Government at Less than Fair Market Value	Provision of goods
3	Preferential Tax Policies in the Western Regions	Income Tax
4	Land Use Tax deduction	Income Tax
5	Preferential Tax Policies for High and New Technology Enterprises	Income Tax
6	Tariff and VAT Exemptions on Imported Materials and Equipment	Tariff & VAT
7	One-Time Awards to Enterprises Whose Products Qualify for “Well-Known Trademarks of China” and “Famous Brands of China”	Grant
8	Matching Funds for International Market Development for Small and Medium Enterprises	Grant
9	Superstar Enterprise Grant	Grant
10	Research & Development (“R&D”) Grant	Grant
11	Innovative Experimental Enterprise Grant	Grant
12	Special Support Fund for Non-State Owned Enterprises	Grant
13	Venture Investment Fund of Hi-Tech Industry	Grant
14	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment	Grant
15	Grant for key enterprises in equipment manufacturing industry of Zhongzheng	Grant
16	Water Conservancy Fund Deduction	Grant
17	Anti-Dumping Respondent assistance	Grant
18	Technology Project assistance	Grant
19	Capital Injections	Grant

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Program Number	Program Name	Program Type
20	Environmental Protection Grant	Grant
21	High and New Technology Grant	Grant
22	Independent Innovation and High-Tech Industrialisation Program	Grant
23	Environmental Prize	Grant
24	Provincial emerging industry and key industry development special fund	Grant
25	Environmental Protection Fund	Grant
26	Intellectual Property licensing	Grant
27	Financial resources construction special fund	Grant
28	Reducing pollution discharging and environmental improvement assessment award	Grant
29	Comprehensive utilisation of resources – VAT refund upon collection	Tariff & VAT
30	Grant of elimination of out dated capacity	Grant
31	Grant from Technology Bureau	Grant
32	Raw Materials (Coking coal) Provided by the Government at Less than Adequate Remuneration	Provision of goods
33	Raw Materials (Coke) Provided by the Government at Less than Adequate Remuneration	Provision of goods
34	Patent Award of Guangdong Province	Grant
35	Wuxing District Freight Assistance	Grant
36	Huzhou City Public Listing Grant	Grant
37	Huzhou City Quality Award	Grant
38	Huzhou Industry Enterprise Transformation & Upgrade Development Fund	Grant
39	Wuxing District Public List Grant	Grant
40	Transformation technique grant for rolling machine	Grant
41	Grant for Industrial enterprise energy management - centre construction demonstration project Year 2009	Grant
42	Key industry revitalization infrastructure spending in 2010	Grant
43	Jinzhou District Research and Development Assistance Program	Grant
44	Debt for equity swaps	Equity Programs
45	Equity infusions	Equity Programs
46	Unpaid dividends	Equity Programs
47	Preferential loans and interest rates	Preferential Loans
48	International trade increase project fund	Grant
49	Industrial economy reform and development fund	Grant
50	Sales revenue increase award	Grant
51	Tax contribution award	Grant

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Program Number	Program Name	Program Type
52	Energy and recyclable economy program	Grant
53	National controlled essential pollutant source supervision system third party operation and maintenance subsidy program	Grant
54	Scientific program awards in high and new scientific zone	Grant

Please answer the questions within parts I-1 to I-7 in relation to these programs.

I-1 PREFERENTIAL INCOME TAX PROGRAMS

1. Did your business or any company/entity related to your business receive any benefit⁴ under the following income tax programs identified above during the investigation period (1 April 2017 to 31 March 2018).

Program 3: Preferential Tax Policies in the Western Regions

Program 4: Land Use Tax Deduction

Program 5: Preferential Tax Policies for High and New Technology Enterprises

Answer: Not applicable, the company didn't receive any benefit under the above income tax programs, the income tax of the company is 25%.

2. It is our understanding that the general tax rate for enterprises in China from 1 July 2010 was 25%. Confirm whether this is correct and if not, please identify the general tax rate for enterprises in China from 1 July 2010, indicating any changes in the taxation rate over the period April 2014 – March 2018.

Answer: Not applicable, the company didn't receive any benefit under the above income tax programs, the income tax of the company is 25%.

3. If your business currently pays corporate income tax at a rate less than 25% (or whatever the rate of general tax is as discussed above) or paid at a rate less than that during the investigation period, please indicate whether the reduced rate relates to any of the preferential income tax programs identified above.

Answer: Not applicable, the company didn't receive any benefit under the above income tax programs, the income tax of the company is 25%.

4. If the income tax rate of less than the general rate does not relate to any of the programs identified above, please provide an explanation for the reduced income tax rate and answer the questions in Part I-1 above in relation to the income tax rate reduction.

⁴ Refer to the Glossary of Terms for a definition of benefit in this context.

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Answer: Not applicable, the company didn't receive any benefit under the above income tax programs, the income tax of the company is 25%.

For **each program** that you have identified above as conferring benefit on your entity, answer the following.

5. Provide complete details of the amount of the benefit received, including whether it was received in total or in instalments.
6. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production, or only certain products that have undergone research and development).
7. Describe the application and approval procedures for obtaining a benefit under the program.
8. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.
9. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
11. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
12. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
13. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
14. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
15. To your knowledge, does the program still operate or has it been terminated?

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16. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-1 in relation to this programme.

17. For each taxation year from 2015 to 2018, complete the "Income Tax" spreadsheet in the *Exporter Questionnaire spreadsheets – grinding balls* workbook.

Answer: Please refer to Appendix H-17 Income Tax.

18. Provide a copy, bearing the official stamp of the appropriate level of the Government of China of all
- corporate income tax acknowledgement form(s) and the income tax return(s) that your company filed for the 2015, 2016, 2017 and 2018 tax years; and
 - income tax instalment payment receipts, and all applicable income tax forms and schedules for the 2015, 2016, 2017 and 2018 tax years.

Answer: Please refer to Appendix H-18 official copy Corporate Income Tax Return provided.

Note: If your company did not file an income tax return in any of the tax years indicated, provide an explanation stating the reasons why you were exempt from filing such a return and the applicable section[s] of the Income Tax Act under which you were exempt from doing so.

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I-2 GRANTS

It is the Commission's understanding that the Government of China may be providing grants to enterprises in China including the following programs identified above:

Program 7: One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'

Program 8: Matching Funds for International Market Development for Small and Medium Enterprises

Program 9: Superstar Enterprise Grant

Program 10: Research & Development (R&D) Assistance Grant

Program 11: Innovative Experimental Enterprise Grant

Program 12: Special Support Fund for Non State-Owned Enterprises

Program 13: Venture Investment Fund of Hi-Tech Industry

Program 14: Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment.

Program 15: Grant for key enterprises in equipment manufacturing industry of Zhongshan

Program 16: Water Conservancy Fund Deduction

Program 17: Anti-dumping Respondent Assistance

Program 18: Technology Project Assistance

Program 19: Capital injections

Program 20: Environmental Protection Grant

Program 21: High and New Technology Enterprise Grant

Program 22: Independent Innovation and High-Tech Industrialization Program

Program 23: Environmental Prize

Program 24: Provincial emerging industry and key industry development special fund

Program 25: Environmental protection fund

Program 26: Intellectual property licensing

Program 27: Financial resources construction special fund

Program 28: Reducing pollution discharging and environment improvement assessment award

Program 30: Grant of elimination of out dated capacity

Program 31: Grant from Technology Bureau

Program 34: Patent Award of Guangdong Province

Program 44: Debt for equity swaps

1. Did your business or any company/entity related to your business receive any benefit under the above programs during the period **1 July 2014 to 31 March 2018**?

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Answer: Not applicable, the company didn't receive any benefits under the above programs.

2. Did your business receive benefits under any other grant (including awards, prizes, funds) program during the period **1 April 2017 to 31 March 2018**?

Answer: Not applicable, the company didn't receive other benefits.

For each program identified in your answer to I-2.1 and I-2.2 above, answer the following.

3. Provide complete details involving the amount of the grant received, including whether the grant was received in a lump sum or multiple instalments.
4. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production, or only certain products that have undergone research and development).
5. Describe the application and approval procedures for obtaining a benefit under the program.
6. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.
7. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
8. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
9. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
10. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
11. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
12. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.

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13. To your knowledge, does the program still operate or has it been terminated?
14. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-1 in relation to this programme.

15. Identify the body responsible for administering the grant.
16. Identify the date of approval of the grant and the date the grant was received.
17. Indicate where the grant was accounted for on your business' financial statements.

I-3 TARIFF AND VAT EXEMPTIONS ON IMPORTED MATERIALS AND EQUIPMENTS

It is our understanding that certain enterprises in China are eligible for exemption from the payment of import duty and import VAT on imported inputs, technologies and machinery, for example.

Program 6: Tariff and VAT Exemptions on Imported Materials and Equipment

Program 29: Comprehensive utilisation of resources – VAT refund upon collection

If your business or any company/entity related to your business received benefits under any such program during the period 1 July 2008 to 31 March 2018, please answer the following questions.

Answer: Not applicable, the company didn't receive any benefits under any such program.

1. Provide complete details involving the amount of the VAT refund received, including whether the refund was received in a lump sum or multiple instalments.
2. Describe the application and approval procedures for obtaining a benefit under the program.
3. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
4. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

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5. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
6. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
7. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
8. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
9. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
10. To your knowledge, does the program still operate or has it been terminated?
11. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?
12. If the program terminated has been substituted for by another program, identify the program.
13. Were the materials and/or equipment that were entitled to a refund of VAT used in the production of the goods during the investigation period? If yes, provide the following information:
 - (a) type of inputs;
 - (b) cost of inputs;
 - (c) quantity of inputs; and
 - (d) amount of VAT refunded.
14. Has your company received exemption from payment of or refunds of import duty and import VAT for imported material inputs at any time that were used in the production of the goods during the investigation period? If yes, provide the following information:
 - (a) description of imported product;
 - (b) country of origin;
 - (c) quantity of imported product;
 - (d) purchase price;

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- (e) terms of purchase (e.g. FOB, CIF);
- (f) ocean freight;
- (g) value for duty of imported product;
- (h) regular rate of taxes and duties;
- (i) concessionary rate of taxes and duties;
- (j) amount of duties and taxes normally applicable;
- (k) amount of duties and taxes paid;
- (l) amount of duties and taxes exempt;
- (m) date of importation;
- (n) tariff classification number;
- (o) customs entry number; and
- (p) application fee.

15. Explain if (and how) the GOC determines which imported inputs are consumed by your business in the production of the subject goods and in what amounts, and the amount of duty paid or payable on the inputs (including any allowance for waste).

16. Explain how the GOC determined the percentage rate of duty exemption.

Please note that goods consumed in the production of exported goods (inputs) include:

- (a) goods incorporated into the exported goods; and
- (b) energy, fuel, oil and catalysts that are used or consumed in the production of the exported goods.

17. Provide a representative sample of copies of import entry documents (for example: bill of entry, invoice from supplier, etc.) for each type of importation covering duty-exempt inputs and duty-paid inputs imported for use in the manufacturing of the subject goods.

18. In addition to the import entry documents, also provide copies, if applicable, of any applications submitted to and/or approval document received from the GOC relating to the exemption from the payment of import duty and import VAT on imported inputs and in relation to the VAT that is refunded on the exportation of the subject goods.

19. Provide copies of reports and audits by the GOC authority responsible for administering the duty rebate or duty drawback scheme with respect to the verification of the importation and use of inputs and the remittance or drawback of the related duty paid or payable.

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I-4 PROVISION OF RAW MATERIALS AT LESS THAN ADEQUATE REMUNERATION:

Program 1: Steel Billet

The applicant claims that public bodies (in the form of state-owned or invested enterprises (SIEs)) are supplying steel billet, directly or indirectly, to manufacturers of grinding balls at less than fair value:

The term SIE is defined in the glossary of this questionnaire.

In relation to this program, provide the following information.

1. Did your business or any company/entity related to your business receive any benefit under the above program during the period **1 April 2017 to 31 March 2018**?

Answer: Not applicable, the company didn't receive any benefit under the above program during the period of review.

2. Does your business purchase any goods/services from SIEs, e.g., raw materials, energy, water, other utilities, etc.?

Answer: Electricity used by the company are purchased from SIE.

3. Provide a list, including a contact name and address, of all your suppliers of steel billet. Indicate whether the supplier is a SIE.

Answer: Not applicable, the company didn't purchase steel billet, material purchased by the company as raw materials of the production of goods under consideration are scrap steel, and all of suppliers of the company are not SIEs.

4. Complete the '**Steel Billet Purchases**' spreadsheet in the *Exporter Questionnaire spreadsheets – grinding balls*.

Provide this data on a **transaction-by-transaction basis, for all purchases of steel billet and bar** during the period **1 January 2017 to 31 March 2018**. This data should be provided for all purchases, not only those of Chinese origin (i.e. include imported materials as well).

Please add more space for additional suppliers and categories of product as required.

Answer: Not applicable, the company didn't purchase steel billet, material purchased by the company as raw materials of the production of goods under consideration are scrap steel.

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5. Did your business receive any reduction/reduced price for the purchase of these goods/services during the investigation period? If so, describe the eligibility criteria that your business had to meet in order to qualify for any reduction in the price paid for the goods/services.

Answer: Not applicable, the company didn't receive any reduction or reduced price for the purchase of any goods or services during the investigation period.

6. Provide copies of all contractual agreements that detail the obligations of the SIE and your business with reference to the granting and receipt of the assistance/benefits.

Answer: Not applicable, there are no such agreements.

7. If your business purchased imported steel billet or bar, explain the reason/s for your business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc.

Answer: Not applicable, the company didn't purchase steel billet, material purchased by the company as raw materials of the production of goods under consideration are scrap steels.

Program 2: Electricity

The applicant claims that public bodies (in the form of state-owned or invested enterprises (SIEs)) are supplying electricity, directly or indirectly, to manufacturers of grinding balls at less than adequate remuneration.

Please answer the following questions in relation to your purchases of electricity from **1 April 2017 to 31 March 2018**.

1. Does your business or related business purchase electricity to manufacture grinding balls? If not, what alternative power source is used in the production of grinding balls?

Answer: It is confirmed that the company purchase electricity to manufacture grinding balls.

2. Provide a list, including a contact name and address, of all your suppliers of electricity, including those purchased through related businesses. Indicate whether the supplier is a SIE and provide evidence supporting this.

**Answer: Electricity supplier of the company is State Grid Anhui Electricity Corporation Ningguo Supplying company which is SIE.
Address: 30th East Jinhe Road, Ningguo city, Anhui province.**

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3. Did your business receive any reduction/reduced price for the purchase of electricity during the investigation period? If so, provide details of the reduction/reduced price and describe the eligibility criteria that your business had to meet in order to qualify for any reduction in the price paid for the electricity.

Answer: Not applicable, the company didn't receive any reduction/reduced price for the purchase of electricity during the investigation period.

4. Please provide a summary of all payments your company made for electricity during the investigation period in the attached spreadsheet labelled "Electricity" and provide copies of invoices and evidence of payment for each.

Answer: Please refer to Appendix I-4-2-4.1 Electricity, and Appendix I-4-2-4.2 VAT Invoices and Lists For Electricity.

5. Provide copies of all contractual agreements that detail the obligations of the SIE and your business with reference to the granting and receipt of the assistance/benefits.

Answer: Not applicable, the company didn't receive any reduction/reduced price for the purchase of electricity during the investigation period.

6. It is understood that the GOC determines the price for electricity in China (refer China's Accession to the WTO document where prices for utilities are confirmed as subject to governmental control). How does the price of electricity in your province differ to the price established by the GOC?

Answer: As far as the company's knowledge, there are no differences between prices of electricity in Anhui province with prices established by the GOC.

Programs 32 and 33

The applicant claims that public bodies (in the form of state-invested enterprises (SIEs)) are supplying coking coal and coke directly or indirectly, to manufacturers of grinding balls at less than adequate remuneration.

In relation to these programs, provide the following information.

1. Describe the nature of your production process for grinding balls, including an itemised list of all raw materials used by your company in the process.

Answer: Materials used in the production of the company are as following:

Name of material
Scrap
Ferrochrome
Ferromanganese

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Ferrosilicon

2. Did your business or any company/entity related to your business receive any benefit under the above programs during the period **1 January 2014 to 31 March 2018**? If yes, provide details.

Answer: Not applicable, the company didn't receive any benefit under the above programs during the period 1 January 2014 to 31 March 2018.

3. Does your business purchase any raw materials (e.g. coking coal or coke) in the manufacture of grinding balls?

Answer: It is confirmed the company purchased raw materials in the manufacture of grinding balls, please refer to the answer to the first question of this section, and coking coal or coke are not used by the company.

Provide responses to Question 4 and Questions 5 – 7 in the tables provided on the “**Raw Materials Purchases**” tab on the attached “**Supplementary Exporter Questionnaire – Grinding Balls**”.

4. Provide data on a transaction-by-transaction basis, for all purchases of raw materials during the period 1 January 2017 to 31 March 2018. This data should be provided for all purchases, not only those of Chinese origin (i.e. include imported materials as well). In the list, please be sure to provide a contact name and address, of all your suppliers of raw materials and indicate whether the supplier is a SIE.

Please add more space for additional suppliers and/or categories of product as required.

Answer: Please refer to Appendix I-4-3-4 Raw Material Purchases.

5. Did your business receive any reduction/reduced price for the purchase of these goods/services during the investigation period? If so, describe the eligibility criteria that your business had to meet in order to qualify for any reduction in the price paid for the goods/services.

Answer: Not applicable, the company didn't receive any reduction or reduced price for the purchase of these goods/services during the investigation period.

6. Provide copies of all contractual agreements that detail the obligations of the SIE and your business with reference to the granting and receipt of the assistance/benefits.

Answer: Not applicable, the company didn't receive any reduction or reduced price for the purchase of these goods/services during the investigation period.

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7. If your business purchased imported raw materials, explain the reason/s for your business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc.

Answer: Not applicable, the company didn't purchase imported materials.

I-5 EQUITY PROGRAMS

The Commission understands that the Government of China may be providing assistance in the form of equity programs that may constitute countervailable subsidies for Chinese suppliers of grinding balls. These programs are:

Program 44: Debt for equity swaps

According to the applicant, the debt for equity swap was a measure used in the financial restructuring of China's State-owned steelmakers to State-owned commercial banks (SOCBs). Pursuant to the *Regulations on Financial Asset Management Companies (promulgated by decree on 20 November 2000)*, the State Council established four Asset Management Companies (AMCs) that were directed to purchase certain non-performing loans from SOCBs. The four AMCs were supervised and managed by the People's Bank of China, China's Ministry of Finance and the China Securities Regulatory Commission. One of the authorised business activities available for the management of non-performing loans purchased by the AMCs was the debt for equity swap. A debt for equity swap is a transaction in which a creditor, in this case an AMC, forgives some or all of a company's debt in exchange for equity in the company.

Provide complete replies to the following questions with regard to debt-for-equity transactions concerning your company and any other related company from 1 January 2008 to 31 March 2018.

1. Describe in detail each transaction with all the steps leading to the debt cancellation in exchange for equity, including the role of all of the government and non-government entities involved in each transaction (e.g. AMCs, SOCBs, steel companies).

Answer: Not applicable, the company has never been involved in the program "Program 44: Debt for equity swaps".

All following questions are not applicable.

Provide answers to Questions 2 – 14 and Question 16 in the tab labelled "**Debt-to-equity**" in the attached file named "**Supplementary Exporter Questionnaire – grinding balls**".

2. On a loan by loan basis, provide the following:
 - a. The amount of the outstanding loans due by your company directly or indirectly to the GOC or to SOCBs cancelled and swapped for equity,
 - b. the terms of the loans and the interest due on the loan,

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- c. the duration and maturity of the loan,
- d. the amount of late interest payments or other arrears on the loan, and
- e. the amount of the interest saved.
- f. the amount of equity received in exchange by the GOC directly or through controlled corporations such as the AMCs,
- g. the number of shares issued,
- h. a description of the shares (e.g. common shares, preferred shares),
- i. the nominal value of the shares,
- j. the company's debt-to-equity ratio before and after the swap, and.
- k. the dates of the transactions.

Also, provide the following information for each “swapped” debt:

- 3. How did your company determine the amount of equity to be issued and the per share price to be paid?
- 4. Explain how the transaction was reflected in the financial statements and provide underlying evidence.
- 5. The source of funds to finance these transactions, including the percentage of public vs. private sources.
- 6. How the proceeds from the debt-for-equity swap were used by your company.
- 7. Provide the relevant original loan contracts between the steel company and the GOC or SOCBs and any contracts, legal documents, and other relevant correspondence containing details on the debt for equity transaction.
- 8. Provide documentation relevant to the decision concerning each debt for equity transaction, including in particular all the documents detailing the rationale for the transaction and the underlying financial details, e.g. the relevant rate of return sought by the lender and/or shareholders, the projections of sales and earnings relating to the company operations prior to the debt for equity conversion, etc.
- 9. Provide internal company documents relating to the debt-for-equity transactions, such as Board of Directors' approval decisions and minutes, Board of Supervisors' approval decisions and minutes, Shareholders' meetings approval decisions and minutes etc.
- 10. Provide documentation relevant to the decision as to the source of funds to finance your operations, e.g., debt vs. equity financing and private vs. government sources.
- 11. Explain in detail how was the amount of equity to be issued in exchange for debt determined and the per share price to be paid. If the shares involved in the swap were publicly traded, please provide the relevant prices at the moment of the transaction.
- 12. Explain the expected commercial rate of return on equity sought by the government and its calculation and provide any study and analysis carried out by independent parties on this issue.

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13. Provide a list of all equity investments made by private (i.e. non-government) entities contemporaneous with the government's investment or debt-to-equity swap, if any. Please provide the dates, the numbers of shares, the amount paid per share for each purchase, and a description of the rights and preferences of the equity interests received by these private entities and how these differ from the rights and preferences of the equity interests received or held by the government.
14. Provide a list of any attempt made by your company to obtain private equity investment and/or agreements involving private equity investments which were then not finalised for whatever reasons. Describe the circumstances of these attempts and/or agreements, and the reasons they were not achieved.
15. Please provide complete, translated audited financial statements for the year of each government equity investment for each of the government entities involved in the transactions, including SOCBs and AMCs. The financial statements should include the complete set of statements, e.g., income statement, balance sheet, statement of change in equity footnotes, and must be accompanied by the auditors' opinion.
16. Please calculate the following financial ratios for your company for each year in which an equity investment was received and for the preceding three years: current ratio, quick ratio, gross profit, operating profits, net profits, return on equity, debt-to-equity, debt-to-assets, interest/debt coverage, and cash flow to debt.

Program 45: Equity infusions

The applicant alleges that the GOC has provided over the years substantial amounts of cash to steel companies producing/exporting the product under investigation through equity infusions. According to the applicant, the GOC acquired shares in companies in which it was already the main shareholder without acquiring additional shareholder rights.

With regard to equity infusions into your company involving directly or indirectly the GOC and/or SOCBs and/or SOEs, please provide the following information since 2008 until 31 March 2018.

Please provide answers to the following questions in the attachment named **"Supplementary Exporter Questionnaire – Grinding Balls"** on the tab labelled **"Equity infusions"**.

Answer: Not applicable, the company has never been involved in the program "Program 45: Equity infusions".

All following questions are not applicable.

1. For Government Equity infusions, please provide the following information regarding the share issue for the equity infusion:
 - (a) the consideration paid,
 - (b) the amount of equity received by the GOC,

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- (c) the name of the GoC entity receiving the shares (can be directly or through controlled corporations),
 - (d) the number of shares issued,
 - (e) a description of the shares (e.g. common shares, preferred shares), and
 - (f) and the date of each transaction.
2. Provide all documentation relevant to your decision concerning each equity infusion, including documents detailing the rationale for the transactions and all of the underlying financial details, e.g. the relevant rate of return sought by the investor(s), projections of sales and earnings relating to the company operations prior to the equity infusion, etc.
3. Provide details of:
- (a) How did your company determined the amount of equity to be issued and the per share price to be paid?
 - (b) How the transaction was reflected in the financial statements and provide underlying evidence?
 - (c) The source of funds to finance these transactions, including the percentage of public vs. private sources.
 - (d) How the proceeds from the share issued were used by your company?
 - (e) If the shares of the company involved were publicly traded, what was the relevant price at the moment of the equity infusion?
 - (f) What was the expected commercial rate of return on equity sought by the government entity?
 - (g) How did it calculate its expected rate of return? Provide any study and analysis carried out by independent parties.
4. For equity investments made by Government, provide details of private (i.e. non-Government entities) equity investments made contemporaneously with the Government's equity infusion, including:
- (a) the dates,
 - (b) the numbers of shares,
 - (c) the amount paid per share for each purchase,
 - (d) a description of the rights and preferences of the equity interests received by these private entities,
 - (e) how these differ from the rights and preferences of the equity interests received or held by the government, and
 - (f) a description of the circumstances and of any agreements related to these private equity purchases including the role played by the government or entities controlled or owned by the government in the negotiation and/or fulfilling of said agreements.

Agreements, notes, or other information related to these purchases should be provided.

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5. Provide a list of any attempt made by your company to obtain private equity investment and/or agreements involving private equity investments which were then not finalised for whatever reasons. Describe the circumstances of these attempts and/or agreements, and the reasons they were not achieved.
6. Please calculate the following financial ratios for your company for each year in which an equity investment was received and for the preceding three years: current ratio, quick ratio, gross profit, operating profits, net profits, return on equity, debt-to-equity, debt-to-assets, interest/debt coverage, and cash flow to debt.

Program 46: Unpaid dividends

The Commission understands that according to GOC policy, state-owned enterprises including the steel companies producing/exporting the goods under consideration do not have to pay dividends to the government as their owner, even when they earn profits. The applicant claims that unpaid dividends should be considered as a disguised grant or as revenue forgone because the GOC does not collect dividends that are normally paid to private investors on their shares.

Answer: Not applicable, the company has never been involved in the program “Program 46: Unpaid dividends”.

All following questions are not applicable.

Please provide the following information:

1. The relevant provisions on distribution of dividends contained in the legislation, in administrative documents, and in any other official documents.
2. The practice and policy on dividend distributions contained in your company documents, including the by-laws, resolutions of the shareholders or the board of directors, minutes of the meeting, shareholders' agreements etc.

For the following questions, please answer the questions in the “**Unpaid dividends**” tabs of the workbook “**Supplementary Exporter Questionnaire – Grinding Balls**”.

3. A list of all dividend distributions to Government entities effected by your company during the investigation period and for the years 2014, 2015, 2016 2017 and 2018, detailing:
 - a) the description of the dividend transactions,
 - b) the date of the dividend transactions
 - c) a description of the various categories of shares involved (e.g. common shares, preference shares, special classes of shares etc.)
 - d) the specific rights attached to the shares,
 - e) the amount distributed as dividends per each category of share,
 - f) the per-share dividend paid out for each category of share,
 - g) the number and class of shares held by the government,

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- h) the percentage of profits distributed per each class of share to the GOC, and
 - i) any taxes paid or payable on these dividend distributions.
4. Provide a copy of the relevant resolutions adopted by the shareholders' meeting or the board of directors deliberating the relevant dividend distribution.
 5. A list of any dividend distributions effected by your company to private shareholders during the investigation period and for the years 2014, 2015, 2016 2017 and 2018, detailing:
 - a) the amounts distributed as dividends,
 - b) the number of shares held by private investors,
 - c) a description of the shares and of their attached rights (e.g. common shares, preferred shares) giving rise to the dividend distributions,
 - d) the percentage of profits distributed per each class of share to the private investors, and
 - e) the dividend per share distributed per each class of share.
 6. What was the amount of profits available for dividend distribution by your company for the years 2014, 2015, 2016 2017 and 2018?
 7. What was the amount of retained earnings since the year 2008 available for distribution to shareholders of the different classes of shares?
 8. A list of investments in fixed assets affected since the year 2008 financed out of retained earnings or other profits otherwise available for distribution to shareholders in previous years used to finance these investments. (Please format as necessary).
 9. All internal company documents relevant to your decision as to the source of funds to finance your operations, e.g., debt vs. equity financing and private vs. government sources.
 10. A detailed description of the accounting treatment and the company policy concerning dividend distributions, retained earnings, and use of the proceeds otherwise available for dividend distribution. Please attach relevant underlying financial statements and records and other relevant evidence.

I-6 PREFERENTIAL LOANS AND INTEREST RATES

It is our understanding that certain enterprises in China benefit from low (subsidised) interest rates from state owned commercial banks (SOCB) and government banks in accordance with the GOC policy to support and develop the expansion of the Chinese steel industry.

If your business or any company/entity related to your business received benefits under any such program during the period 1 January 2013 to 31 March 2018, please answer the following questions.

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**Answer: Not applicable, the company didn't have bank loans.
This section is not applicable for the company.**

1. Provide a general overview of how your company secures necessary financial resources on the financial market (e.g. Loans, issuance of bonds etc.)

Provide answers to the following questions in "**Loans**" tab of the "**Supplementary Exporter Questionnaire – Grinding Balls**" workbook attached.

2. Provide a list of all the loans provided to your company from banks and financial institutions which have not been fully reimbursed by the end of the investigation period.
3. Provide specific details of the loan, including the start date of the loan, the principal amount of the loan, terms and conditions of the loan, purpose of the loan, the repayment terms/frequency, repayment amount, interest rate, interest type (e.g. fixed, variable etc.), if the loan has been redrawn any time during its duration, please provide the redraw date, amount redrawn and the reason for redraw.
4. Indicate whether each bank is Chinese or foreign-owned and give the percentage of government ownership of each bank (including ownership by entities owned or controlled by a government).
5. In the case of each loan from government-owned or controlled, please explain the reason for borrowing from such a bank rather than a commercial bank. What are the differences in the terms and conditions of loans between the government and commercial banks?
6. Explain how the decisions to grant the loan or its conditions are dependent on the purpose of the loan and give details on the process your company went through to apply for the loan. Please provide detail on what conditions or criteria your company needed to fulfil to be granted the loan.
7. For each of the loans listed, provide copies of signed loan agreements between the bank which provided the loan and company which was the addressee of the loan specifying the conditions of the loan such as amount, term of repayment, interest rate etc. Also provide a copy of your application for the loan.

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Note: If your company has more than one loan from the same bank/financial institution which were not repaid by the end of the investigation period and the loan agreements for these loans are standardised, it is sufficient at this stage to provide an English translation for one of them only (e.g. If your company has multiple loans from one particular bank which only differ in amounts you only need to translate one of them into English for your questionnaire response. However it is necessary to translate all credit line agreements from which loans not repaid by the end of the investigation period were drawn.

8. Please explain whether the granting of the specific loan depended on the link between the purpose of the loan and the goals specified in any government plan or development program. Provide a copy of the laws, regulations, administrative guidelines and any other acts relevant for the operation of this lending with any subsequent amendments. Also include a copy of any governmental or development plan of which the scheme represents a direct implementation.
9. For each loan application, please explain the involvement of third parties such as government departments, local councils, party committees in the whole process since the application for the loan up to the decision whether the loan is granted or not.
10. In the “Loans” spreadsheet, provide the information requested on guarantees for the loans provided to your company.
11. Please give details of all loan applications during the investigation period which were refused; give the name of the bank, the amount of the loan requested and the reasons for refusal.
12. Provide any other information you may deem necessary for the commission to make an assessment on the subsidisation of producers/exporters of the product under investigation. You may adjust the table in the “Loans” tab as necessary to include this additional information.

I-7 ANY OTHER PROGRAMS

If the Government of China, any of its agencies or any other authorised body has provided any other benefit⁵ under any other assistance programs to your entity not previously addressed, identify the program(s).

Answer: Not applicable, the company didn't receive any other benefits from any agencies or any other authorized body of GOC under any assistance programs.

This section is not applicable to the company.

⁵ Refer to the Glossary of Terms for a definition of benefit in this context.

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This may have included:

- the provision of grants, awards or prizes;
- the provision of goods or services at a reduced price (e.g. electricity, gas, raw materials (including, for example, zinc), transport);
- the reduction of tax payable including income tax and VAT;
- reduction in land use fees;
- loans from Policy Banks at below-market rates; or
- any other form of assistance.

For **each program** that you have identified above as conferring benefit on your entity, answer the following.

1. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production, or only certain products that have undergone research and development).
2. Describe the application and approval procedures for obtaining a benefit under the program.
3. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.
4. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
5. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
6. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
7. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
8. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.

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9. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.

10. To your knowledge, does the program still operate or has it been terminated?

11. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-1 in relation to this programme.

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SECTION J - EXPORTER'S DECLARATION

I hereby declare that.....(company) did, during the period of investigation export the goods under consideration and have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

I hereby declare that.....(company) did not, during the period of investigation, export the goods under consideration and therefore have not completed the attached questionnaire.

Name:.....

Signature :.....

Position in

Company :.....

Date :.....

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SECTION K - CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – general information	<input type="checkbox"/>
Section B – export price	<input type="checkbox"/>
Section C – like goods	<input type="checkbox"/>
Section D – domestic price	<input type="checkbox"/>
Section E – fair comparison	<input type="checkbox"/>
Section F – exports to third countries	<input type="checkbox"/>
Section G – costing information	<input type="checkbox"/>
Section H – particular market situation	<input type="checkbox"/>
Section I – countervailing (subsidisation)	<input type="checkbox"/>
Section J - declaration	<input type="checkbox"/>

Electronic Data	Please tick if you have provided spreadsheet
INCOME STATEMENT	<input type="checkbox"/>
TURNOVER – sales summary	<input type="checkbox"/>
AUSTRALIAN SALES – list of sales to Australia	<input type="checkbox"/>
DOMESTIC SALES – list of all domestic sales of like goods	<input type="checkbox"/>
LIKE GOODS	<input type="checkbox"/>
THIRD COUNTRY – third country sales	<input type="checkbox"/>
PRODUCTION – production figures	<input type="checkbox"/>
DOMESTIC CTMS – costs of goods sold domestically	<input type="checkbox"/>
AUSTRALIAN CTMS – costs of goods sold to Australia	<input type="checkbox"/>
INCOME TAX – tax paid by your business for tax years 2011 to 2013	<input type="checkbox"/>
STEEL BILLET PURCHASES – data for all steel billet or bar purchased during the investigation period	<input type="checkbox"/>
RAW MATERIAL PURCHASES - data for integrate manufacturers - all raw materials purchased during the investigation	<input type="checkbox"/>
ELECTRICITY – data for all electricity purchased during the investigation period	<input type="checkbox"/>
VAT AND TARIFF – data for VAT and Tariff exemptions	<input type="checkbox"/>

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APPENDIX 1 - GLOSSARY OF TERMS

This glossary is intended to provide you with a basic understanding of technical terms that appear in the questionnaire.

Adjustments

To enable a fair comparison between the export price and the normal value Australian legislation provides for the adjustment of the domestic price paid for like goods. Adjustments are made to account for sales occurring at different times, specification differences, and differences in the terms or circumstances of the sales. The adjustment to the normal value may be upward or downward. Areas where you believe an adjustment is necessary should be identified. Section E of the questionnaire refers.

Examples of adjustments that may be made include: *sales occurring at different times*

(it is sometimes necessary to compare domestic and export sales made at different times - in these circumstances an adjustment may be made to reflect price movements during that time); *specification differences; packaging; taxes; level of trade; advertising; servicing/warranty; inland freight; warehousing; export charges; credit terms; duty drawback; commissions.*

Adjustments may also be required where the normal value is based upon costs to make and sell.

Arms length

Sales are not considered to be at "arms length" on your domestic market if there is any consideration payable for the goods other than their price, or there is an association between the buyer and the seller which affects the price, or there will be a reimbursement, compensation or benefit for, or in respect of, the price.

Associated Companies

Persons shall be deemed to be associates of each other if, and only if:

(a) both being natural persons:

- (i) they are connected by a blood relationship or by marriage or by adoption; or
- (ii) one of them is an officer or director of a body corporate controlled, directly or indirectly, by the other;

(b) both being bodies corporate:

- (i) both of them are controlled, directly or indirectly, by a third person (whether or not a body corporate); or
- (ii) both of them together control, directly or indirectly, a third body corporate; or
- (iii) the same person (whether or not a body corporate) is in a position to cast, or control the casting of, 5% or more of the maximum number of votes that might be cast at a general meeting of each of them; or

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(c) one of them, being a body corporate, is, directly or indirectly, controlled by the other (whether or not a body corporate); or

(d) one of them, being a natural person, is an employee, officer or director of the other (whether or not a body corporate); or

(e) they are members of the same partnership.

Benefit

As further defined in relation to the definition of the term 'subsidy' below, 'benefit' may include:

- a direct transfer of funds;
- the acceptance of liabilities (e.g debts or other liabilities), whether actual or potential, of your enterprise;
- the forgoing, or non-collection, of revenue (other than an allowable exemption or remission) that was otherwise due (e.g. reduced rate of income tax, waiving certain other taxes);
- the provision of goods or services otherwise than in the course of providing normal infrastructure; or
- the purchase of goods

by the Government of China (GOC) (at any level), a public body of the GOC, or a private body entrusted by the GOC to carry out GOC functions.

Constructed value

In cases where domestic prices paid for the goods under consideration in the country of export cannot be used for the determination of normal value, i.e. when there are no or insufficient sales or where such sales were not made in the ordinary course of trade, normal value may be based on a constructed value. Constructed value is calculated on the basis of the cost of production of the goods under consideration plus a reasonable amount for selling, general and administration costs, and for profits, that are associated with sales on the domestic market of the country of export.

Cost of production/manufacturing

The cost of production or manufacture consists of all manufacturing costs associated with the goods. It is the sum of direct materials, direct labour and factory overheads.

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Cost to make and sell (CTMS)

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.

Country of origin

The country in which the last significant process in the manufacture or production of the goods was performed.

Date of sale

The Commission will normally use the invoice date as recorded in the exporter or producer's records. Another date may be used if this better reflects the material terms of sale. The questionnaire directs attention to matching data sets of domestic and export sales where some other date is used, as well as matching cost information.

Direct labour cost

Direct labour is categorised as a variable cost, ie. the value varies with the level of production.

Dumping

Dumping occurs when the products of one country are exported to another country at a price less than their normal value.

Dumping margin

Where the export price is less than the normal value the dumping margin is the amount of the difference. It can be expressed as a value or as a percentage of the export price.

Export price

The export price of the goods is usually the price paid or payable to the exporter in arms length transactions, in most instances calculated at the Free on Board (FOB) level.

Exporting country

The country of export is normally the country of origin from which the goods are shipped. The country of export may be an intermediate country, except where the products are merely transhipped through that country, or the products concerned are not produced in that country, and there is no comparable price in that country.

Enterprise

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“Enterprise” includes a group of enterprises, an industry and/or a group of industries

Factory overheads

Factory overheads consist of variable costs e.g. power, supplies, indirect labour and fixed costs e.g. factory rent, factory insurance, factory depreciation etc.

Foreign Invested Enterprise (FIE)

An FIE may be:

1. Chinese-foreign equity joint venture:

Joint venture between a Chinese company, enterprise, or other business organisation and a foreign company, enterprise, business organisation or individual set up in the form of a Chinese limited liability company.

The characteristics of a Chinese-foreign equity joint venture are joint investment, joint operation, and the participants share profits, risks and losses in proportion to their respective contributions to the registered capital of the joint venture.

The proportion of the investment by the foreign party is no less than 25% in the registered capital of equity joint venture.

2. Chinese-foreign contractual joint venture:

A joint venture established between foreign enterprises and other economic organisations or individuals, and Chinese enterprises or other economic organisations within the territory of China. The rights and obligations of each party are determined in accordance with the agreement specified in the contractual joint venture contract. The investment or conditions for cooperation contributed by the Chinese and foreign parties may be provided in cash or in kind, or may include the right to the use of land, industrial property rights, non-patent technology or other property rights.

3. Wholly foreign owned enterprises:

A wholly foreign owned enterprise is established by foreign enterprises and other economic organisations or by individuals pursuant to the Chinese laws within the territory of China. All of the wholly foreign owned enterprise’s capital is invested by foreign investors. It may also be referred to as a Foreign Enterprise (FE).

Goods under consideration (the goods)

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

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The following abbreviations are commonly used (comment is provided concerning costs that are normally borne by the seller):

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the seller's premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc paid if required)
FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance) the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CPT	carriage paid to
CIP	carriage and insurance paid to the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried by air, road, rail etc
DAF	delivered at frontier (goods carried by rail or road and cleared for export at the named place at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer's disposal)
DES	delivered ex ship (goods made available to the buyer on board the ship uncleared for import at the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc incurred upon importation)

Investigation period

A period defined by the Commission over which importations of the goods are examined.

Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods under consideration or

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that, although not alike in all respects have characteristics closely resembling those of the goods under consideration. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

Normal value

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based upon all costs to make and sell the goods. Profit may also be included if the sales on the domestic market are profitable. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, the Commission will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

Where domestic price generally, and the trade of the exporting country are determined or substantially influenced by the government of the exporting country, an alternative/surrogate market economy is selected by the Commission and the normal value is determined as if the surrogate country were the export source.

Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

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Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be constructed from costs to make and sell.

Particular market situation

Refers to a situation within the domestic market of exported goods that renders sales within that market of those goods unsuitable for determining normal values under s.269TAC(1) of the Act.

Program(s)

The term “program”, as used throughout this questionnaire in reference to alleged subsidies, refers to broad categories of subsidies that Customs and Border Protection has reason to believe may be available to exporters of the goods.

In this regard, the term “program” as used in this questionnaire should not be taken to necessarily refer to formal programs maintained by the GOC, nor should it be taken to refer to one specific subsidy. Rather, “program” as used in this questionnaire can refer to informal subsidies provided by the GOC, and can also refer to multiple individual, albeit similar, subsidies.

Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- domestic sales of like goods;
- sale of goods of the same general category by the exporter; or
- sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director’s fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.

Throughout this questionnaire, there are certain words and terminology used that require some clarification. The following are their definitions for purposes of this investigation.

State-owned or state-invested enterprise (SIE)

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For the purposes of this questionnaire, SOE refers to any company or enterprise that is wholly or partially owned by the GOC as defined above (either through direct ownership or through association).

In previous investigations and correspondence, the GOC has advised that the use of the term 'SOE' is declining in China, and that these enterprises are now referred to with terms such as:

- 'enterprises with state investment'
- 'state-owned assets'
- 'state-invested enterprises'
- 'enterprises under the supervision of SASAC'

of which there are several types.

For the purposes of this questionnaire, SOE refers to any and all of the above types of enterprises.

Subsidy

In respect of goods exported to Australia, means:

(a) a financial contribution:

(i) by a government of the country of export or country of origin of the goods;
or

(ii) by a public body of that country or a public body of which that government is a member; or

(iii) by a private body entrusted or directed by that government or public body to carry out a governmental function;

that involves:

(iv) a direct transfer of funds from that government or body; or

(v) the acceptance of liabilities, whether actual or potential, by that government or body; or

(vi) the forgoing, or non-collection, of revenue (other than an allowable exemption or remission) due to that government or body; or

(vii) the provision by that government or body of goods or services otherwise than in the course of providing normal infrastructure; or

(viii) the purchase by that government or body of goods or services; or

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(b) any form of income or price support as referred to in Article XVI of the General Agreement on Tariffs and Trade 1994 that is received from such a government or body;

if that financial contribution or income or price support confers a benefit (whether directly or indirectly) in relation to the goods exported to Australia.