

10 August 2017

Non-Confidential

Mr Matthew Williams
Director, Investigations 3
Anti-Dumping Commission
Department of Industry, Innovation and Science
L35/55 Collins St,
Melbourne, Vic, 3000

Dear Matthew,

**Accelerated Exporter Review for Sino Sources Tech Co., Ltd and Jianwei Tube Co., Ltd
- Hollow Structural Sections from China – New Exporter**

We refer to our Accelerated Exporter Review application that has been previously lodged on behalf of Sino Sources Tech (Sino Sources – the Exporter) and our subsequent Part A section of the Questionnaire lodged by Jianwei Tube (Jianwei Tube – the manufacturer), vide Division 6 of Part XVB of the Customs Act 1901 (the Act).

We have also since lodged Part A of the Questionnaire for Sino Sources and provided additional supportive information that we believe confirms our view that Sino Sources can be regarded as the 'Exporter' for the purposes of our Accelerated Exporter Review application and related definitions contained within the Customs Act 1901 and the Dumping and Subsidy Manual (April 2017).

In addition, we wish to express our appreciation of the Commission's favourable consideration of our request for one week's extension to lodge our separate and detailed Exporter Questionnaires for each company, from the original due date of 3 August 2017, until today.

Consequently, please find attached our detailed Exporter Questionnaires for Sino Sources and Jianwei Tube, including the Non-Confidential versions.

Background

As you are aware, the legislation sets out, among other things, procedures to be followed by the Commissioner in dealing with an application for an accelerated review of a dumping duty notice and countervailing duty notice by certain exporters of the goods covered by the related notices.

Based on the information provided previously and today, we believe the Commission should be satisfied that:

- the application satisfies the requirements of subsection 269ZF(1);
- the conditions for rejection under subsection 269ZE(2) have not been met; and
- the circumstances in which an accelerated review can be sought under subsection 269ZE(1) have been satisfied.

Accordingly, we seek the Commission's conclusion that the applicant has been eligible to apply for, and has lodged a valid application for an accelerated review.

Existing Measures

On 19 September 2011, an investigation into the alleged Dumping and Subsidisation of certain Hollow Structural Sections exported to Australia from the People's Republic of China (China), the Republic of Korea (Korea), Malaysia, the Kingdom of Thailand (Thailand) and Taiwan was initiated following an application lodged by Australian Tube Mills Pty Ltd (ATM).

During the investigation, as outlined in the Anti-Dumping Commission Report No. 177 (REP 177), was found that:

- Hollow structural sections imported from China, Korea, Malaysia and Taiwan were dumped at various margins; and
- Hollow structural sections imported from China were in receipt of countervailable subsidies.

Accordingly, it was recommended that the then Minister for Home Affairs (Minister), impose Anti-Dumping measures (in the form of interim dumping duty (IDD) on the goods exported from China, Korea, Malaysia and Taiwan and interim countervailing duty (ICD) on the goods exported from China (excluding two exporters).

The Minister accepted these recommendations and, on 3 July 2012, published a dumping duty notice and countervailing duty notice.

Upon application by Dalian Steelforce, this decision was reviewed by the then Trade Measures Review Officer and reinvestigated by the then Australian Customs and Border Protection Service (ACBPS). The reinvestigation resulted in the ACBPS recommending to the Minister, in Report 203, that the dumping duty notice and countervailing duty notice remain in place, however, with an alteration of the amount of interim dumping duty (IDD) applicable to the exports of Dalian Steelforce (amended to zero).

The Minister accepted these recommendations, and on 13 May 2013 declared as such via a public notice published under section 269ZZM of the Act. Following an appeal to the Federal Court of Australia, the Countervailing Notice was revoked as it relates to Dalian Steelforce.

The Goods Subject of The Application

Description

The goods the subject of the application (the goods) are:

Certain electric resistance welded pipe and tube made of carbon steel, comprising circular and non-circular hollow sections. Normally referred to as either CHS (circular or oval hollow sections) or RHS (rectangular or square hollow sections) collectively referred to as hollow structural sections (HSS).

Tariff Classification

The goods are classified to the following tariff subheadings in Schedule 3 to the Customs Tariff Act 1995:

- 7306.30.00
- 7306.61.00
- 7306.69.00

We believe our client's imported steel tubes from China are considered classified to 7306.61.00/22.

Exporter Questionnaires

Sino Sources

Please find attached the following detailed Exporter Questionnaire for Sino Sources (i.e. Confidential and Non-Confidential versions), being the Exporter and Exclusive Distributor for Jianwei Tube, as per the following Exhibit listing: -

SN	Sheet Name	Limited or Open	Sino Sources
1	Exhibit A-3.2 Shareholders	Limited	✓
2	Exhibit A-3.5 Affiliated Companies	Limited	Not Applicable
3	Exhibit A-3.9 Internal Organisation Structure	Limited	✓
4	Exhibit A-4.1 Financial Statement-2016	Limited	✓
6	Exhibit A-5 Income Statements	Limited	✓
7	Exhibit A-6 Turnover	Limited	✓
8	Exhibit B-1 Contact of the Australian Customers	Limited	✓
9	Exhibit B-4 Australian Sales	Limited	✓
10	Exhibit B-9 Sample Export Documents	Limited	✓
11	Table C-3 LIKE GOODS	Limited	Pending
12	Exhibit D-4 Domestic Sales	Limited	✓
13	Exhibit D-7 Sample Domestic Sales Documents	Limited	✓
14	Exhibit F-1 Third Country Sales	Limited	✓
15	Exhibit G-1 Production Process	Limited	Not Applicable
16	Exhibit G-2 Production Capacity	Limited	Not Applicable
17	Exhibit G-3 Domestic CTMS	Limited	Not Applicable
18	Exhibit G-4 Australian CTMS	Limited	Not Applicable
19	Exhibit G-5 Major Raw Material Costs	Limited	Not Applicable
20	Exhibit B-9 Sample Export Documents	Limited	✓
21	Exhibit H-1.16 Income Tax	Limited	✓
22	Exhibit H-1.17 Income Tax Return Form.	Limited	✓
23	Exhibit H-4.3 Suppliers Lists	Limited	Not Applicable
24	Exhibit H-4.4 HRC Purchases.	Limited	Not Applicable
25	Exhibit H-5.5 Grants	Limited	✓
26	Exhibit H-5.8 Grants documentation.	Limited	✓
27	2. Credit expenses& packing worksheet	Limited	✓

Jianwei Tube

Please also find attached the following detailed Exporter Questionnaire for Jianwei Tube (i.e. Confidential and Non-Confidential versions), being the manufacturer of the steel tubes exported by Sino Sources, as per the following Exhibit listing: -

Exhibit List		
SN	Exhibit Name	Remark
1	Exhibit A-3.2 Shareholders	✓
2	Exhibit A-3.5 Affiliated Companies	Not Applicable
3	Exhibit A-3.9 Internal Organisation Structure	✓
4	Exhibit A-4.1 Financial Statements -2016	✓
5	Exhibit A-5 Income Statements	✓
6	Exhibit A-6 Turnover	✓
7	Exhibit B-1 Contact of the Australian Customers	Not Applicable
8	Exhibit B-4 Australian Sales	Not Applicable
9	Exhibit B-9 Sample Export Documents	Not Applicable
10	Table C-3 LIKE GOODS	Not Applicable
11	Exhibit D-4 Domestic Sales	✓
12	Exhibit D-7 Sample Domestic Sales Documents	✓
13	Exhibit F-1 Third Country Sales	Not Applicable
14	Exhibit G-1 Production Process	✓
15	Exhibit G-2 Production Capacity	✓
16	Exhibit G-4 Australian CTMS	Not Applicable
17	Exhibit G-3 Domestic CTMS	✓
18	Exhibit H-1.16 Income Tax	✓
19	Exhibit H-1.17 Income Tax Return Form.	✓
20	Exhibit H-2.1 Grants	Not Applicable
21	Exhibit H-4.3 Suppliers Lists	✓
22	Exhibit H-4.4 HRC Purchases.	✓
23	2. Credit expenses& packing worksheet"	✓

New Exporter Review Period

As previously requested, we have now adjusted the Review Period based on the 1 June 2016 to 31 May 2017, however given the additional review of measures being announced since lodgment of our application and for consistency reasons, we have presented our information over the thirteenth month period of 1 June 2016 to 30 June 2017.

We trust this presentation of information is satisfactory to cover the various periods involved with the multiple reviews concurrently being conducted. Where required, the excel filters can be utilised to adjust the relevant timelines involved for each review.

Ordinary Course of Trade

Based on the supportive and detailed information provided within the attached questionnaires, we believe this information supports our view that both companies conduct business in the 'Ordinary Course of Trade' as per the following definition: -

"CUSTOMS ACT 1901 - SECT 269TAAD

Ordinary course of trade

(1) If the Minister is satisfied, in relation to goods exported to Australia:

(a) that like goods are sold in the country of export in sales that are arm's length transactions in substantial quantities during an extended period:

(i) for home consumption in the country of export; or

(ii) for exportation to a third country;

at a price that is less than the cost of such goods; and

(b) that it is unlikely that the seller of the goods will be able to recover the cost of such goods within a reasonable period;

the price paid for the goods referred to in paragraph (a) is taken not to have been paid in the ordinary course of trade.

(2) For the purposes of this section, sales of goods at a price that is less than the cost of such goods are taken to have occurred in substantial quantities during an extended period if the volume of sales of such goods at a price below the cost of such goods over that period is not less than 20% of the total volume of sales over that period.

(3) Costs of goods are taken to be recoverable within a reasonable period of time if, although the selling price of those goods at the time of their sale is below their cost at that time, the selling price is above the weighted average cost of such goods over the investigation period.

(4) The cost of goods is worked out by adding:

(a) the amount determined by the Minister to be the cost of production or manufacture of those goods in the country of export; and

(b) the amount determined by the Minister to be the administrative, selling and general costs associated with the sale of those goods.

(5) Amounts determined by the Minister for the purposes of paragraphs (4)(a) and (b) must be worked out in such manner, and taking account of such factors, as the regulations provide in respect of those purposes.

Arm's Length Transactions

Further, as supported by the attached comprehensive information, we believe that each company can be regarded as conducting 'Arm's Length' transactions as per the following definition: -

"CUSTOMS ACT 1901 - SECT 269TAA

Arm's length transactions

(1) For the purposes of this Part, a purchase or sale of goods shall not be treated as an arm's length transaction if:

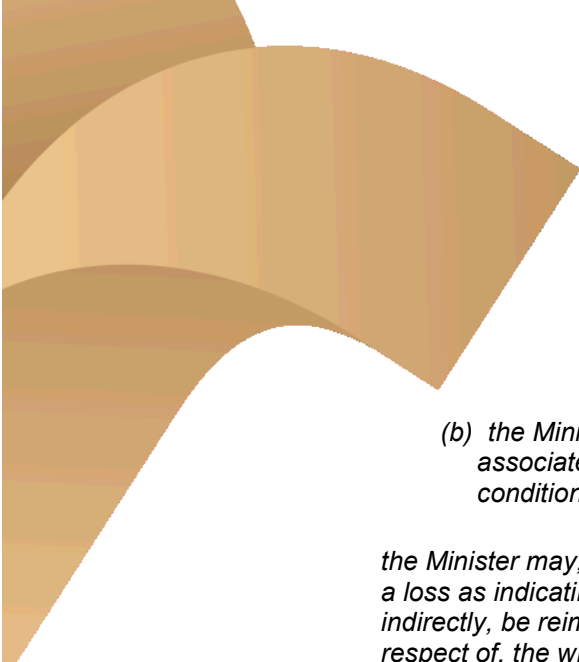
- (a) there is any consideration payable for or in respect of the goods other than their price; or
- (b) the price appears to be influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; or
- (c) in the opinion of the Minister the buyer, or an associate of the buyer, will, subsequent to the purchase or sale, directly or indirectly, be reimbursed, be compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.

(1A) For the purposes of paragraph (1)(c), the Minister must not hold the opinion referred to in that paragraph because of a reimbursement in respect of the purchase or sale if the Minister is of the opinion that the purchase or sale will remain an arms length transaction in spite of the payment of that reimbursement, having regard to any or all of the following matters:

- (a) any agreement, or established trading practices, in relation to the seller and the buyer, in respect of the reimbursement;
- (b) the period for which such an agreement or practice has been in force;
- (c) whether or not the amount of the reimbursement is quantifiable at the time of the purchase or sale.

(2) Without limiting the generality of subsection (1), where:

- (a) goods are exported to Australia otherwise than by the importer and are purchased by the importer from the exporter (whether before or after exportation) for a particular price; and

- 
- (b) *the Minister is satisfied that the importer, whether directly or through an associate or associates, sells those goods in Australia (whether in the condition in which they were imported or otherwise) at a loss;*

the Minister may, for the purposes of paragraph (1)(c), treat the sale of those goods at a loss as indicating that the importer or an associate of the importer will, directly or indirectly, be reimbursed, be compensated or otherwise receive a benefit for, or in respect of, the whole or a part of the price.

(3) In determining, for the purposes of subsection (2), whether goods are sold by an importer at a loss, the Minister shall have regard to:

- (a) the amount of the price paid or to be paid for the goods by the importer; and*
- (b) such other amounts as the Minister determines to be costs necessarily incurred in the importation and sale of the goods; and*
- (c) the likelihood that the amounts referred to in paragraphs (a) and (b) will be able to be recovered within a reasonable time; and*
- (d) such other matters as the Minister considers relevant.*

(4) For the purposes of this Part, 2 persons shall be deemed to be associates of each other if, and only if:

- (a) both being natural persons:
 - (i) they are members of the same family; 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**
- (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.*

Note: In relation to the reference to member of a family in subparagraph (4)(a)(i), see also section 4AAA.

Export Price Calculation

Based on the comprehensive data provided in relation to both the manufacturer and the exporter, particularly given compliance with the foregoing definitions, we believe an export price calculation can be derived from the data provided in accordance with the following definitional issues: -

CUSTOMS ACT 1901 - SECT 269TAB

Export price

(1) *For the purposes of this Part, the export price of any goods exported to Australia is:*

(a) *where:*

(i) the goods have been exported to Australia otherwise than by the importer and have been purchased by the importer from the exporter (whether before or after exportation); and

(ii) the purchase of the goods by the importer was an arms length transaction;

the price paid or payable for the goods by the importer, other than any part of that price that represents a charge in respect of the transport of the goods after exportation or in respect of any other matter arising after exportation; or

(b) *where:*

(i) the goods have been exported to Australia otherwise than by the importer and have been purchased by the importer from the exporter (whether before or after exportation); and

(ii) the purchase of the goods by the importer was not an arms length transaction; and

(iii) the goods are subsequently sold by the importer, in the condition in which they were imported, to a person who is not an associate of the importer;

the price at which the goods were so sold by the importer to that person less the prescribed deductions; or

(c) in any other case--the price that the Minister determines having regard to all the circumstances of the exportation.

Normal Value Calculation

Critical in any dumping margin calculation is the assessment of the Normal Value or domestic selling prices based on the arm's length principle and trade being conducted in the ordinary course of business.

Whilst we are still assessing the information provided today in the context of the most appropriate method to assess the Normal Value of the like goods, given our initial review of the information presented, we believe a domestic selling price can be calculated taking into consideration the following definitional issues: -

“CUSTOMS ACT 1901 - SECT 269TAC

Normal value of goods

(1) Subject to this section, for the purposes of this Part, the normal value of any goods exported to Australia is the price paid or payable for like goods sold in the ordinary course of trade for home consumption in the country of export in sales that are arms length transactions by the exporter or, if like goods are not so sold by the exporter, by other sellers of like goods.

(1A) For the purposes of subsection (1), the reference in that subsection to the price paid or payable for like goods is a reference to that price after deducting any amount that is determined by the Minister to be a reimbursement of the kind referred to in subsection 269TAA(1A) in respect of the sales.

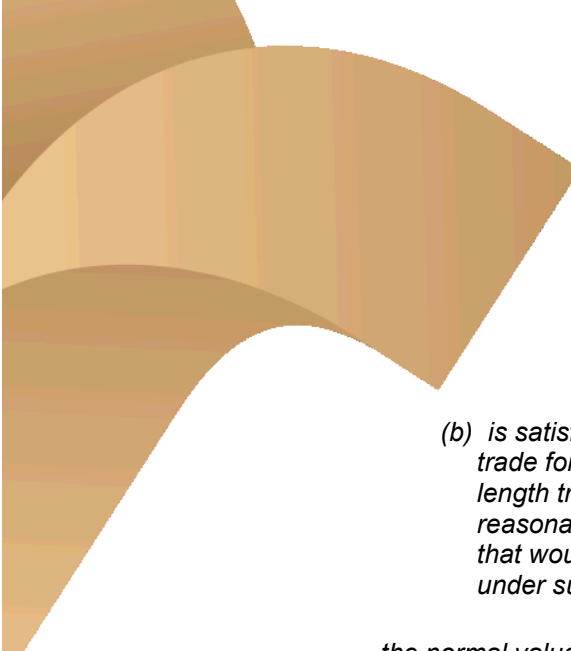
(2) Subject to this section, where the Minister:

(a) is satisfied that:

(i) because of the absence, or low volume, of sales of like goods in the market of the country of export that would be relevant for the purpose of determining a price under subsection (1); or

(ii) because the situation in the market of the country of export is such that sales in that market are not suitable for use in determining a price under subsection (1);

the normal value of goods exported to Australia cannot be ascertained under subsection (1); or



(b) is satisfied, in a case where like goods are not sold in the ordinary course of trade for home consumption in the country of export in sales that are arms length transactions by the exporter, that it is not practicable to obtain, within a reasonable time, information in relation to sales by other sellers of like goods that would be relevant for the purpose of determining a price under subsection (1);

the normal value of the goods for the purposes of this Part is:

(c) except where paragraph (d) applies, the sum of:

(i) such amount as the Minister determines to be the cost of production or manufacture of the goods in the country of export; and

(ii) on the assumption that the goods, instead of being exported, had been sold for home consumption in the ordinary course of trade in the country of export--such amounts as the Minister determines would be the administrative, selling and general costs associated with the sale and the profit on that sale; or

(d) if the Minister directs that this paragraph applies--the price determined by the Minister to be the price paid or payable for like goods sold in the ordinary course of trade in arms length transactions for exportation from the country of export to a third country determined by the Minister to be an appropriate third country, other than any amount determined by the Minister to be a reimbursement of the kind referred to in subsection 269TAA(1A) in respect of any such transactions.

(3) The price determined under paragraph (2)(d) is a price that the Minister determines, having regard to the quantity of like goods sold as described in paragraph (2)(d) at that price, is representative of the price paid in such sales.

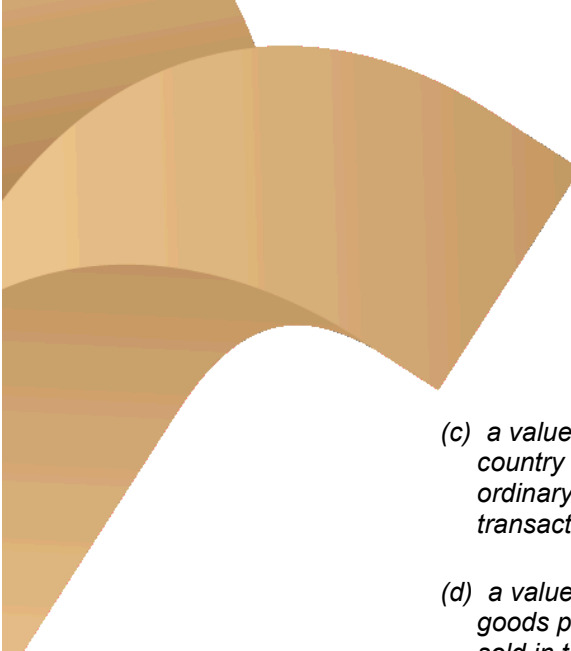
(3A) The Minister is not required to consider working out the normal value of goods under paragraph (2)(d) before working out the normal value of goods under paragraph (2)(c).

(4) Subject to subsections (6) and (8), where the Minister is satisfied that it is inappropriate to ascertain the normal value of goods in accordance with the preceding subsections because the Government of the country of export:

(a) has a monopoly, or substantial monopoly, of the trade of the country; and

(b) determines or substantially influences the domestic price of goods in that country;

the normal value of the goods for the purposes of this Part is to be a value ascertained in accordance with whichever of the following paragraphs the Minister determines having regard to what is appropriate and reasonable in the circumstances of the case:

- 
- (c) a value equal to the price of like goods produced or manufactured in a country determined by the Minister and sold for home consumption in the ordinary course of trade in that country, being sales that are arms length transactions;
 - (d) a value equal to the price determined by the Minister to be the price of like goods produced or manufactured in a country determined by the Minister and sold in the ordinary course of trade in arms length transactions for exportation from that country to a third country determined by the Minister to be an appropriate third country;
 - (e) a value equal to the sum of the following amounts ascertained in respect of like goods produced or manufactured in a country determined by the Minister and sold for home consumption in the ordinary course of trade in that country:
 - (i) such amount as the Minister determines to be the cost of production or manufacture of the like goods in that country;
 - (ii) such amounts as the Minister determines to be the administrative, selling and general costs associated with the sale of like goods in that country and the profit on that sale;
 - (f) a value equal to the price payable for like goods produced or manufactured in Australia and sold for home consumption in the ordinary course of trade in Australia, being sales that are arms length transactions.

(5) The price determined under paragraph (4)(d) is a price that the Minister determines, because of the quantity of like goods sold as described in paragraph (4)(d) at that price, is representative of the price paid in such sales.

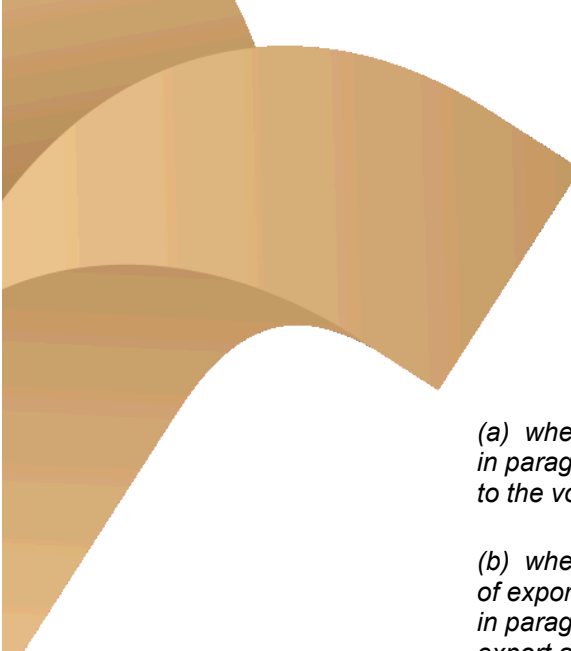
(5A) Amounts determined:

- (a) to be the cost of production or manufacture of goods under subparagraph (2)(c)(i) or (4)(e)(i); and
- (b) to be the administrative, selling and general costs in relation to goods under subparagraph (2)(c)(ii) or (4)(e)(ii);

must be worked out in such manner, and taking account of such factors, as the regulations provide for the respective purposes of paragraphs 269TAAD(4)(a) and (b).

(5B) The amount determined to be the profit on the sale of goods under subparagraph (2)(c)(ii) or (4)(e)(ii), must be worked out in such manner, and taking account of such factors, as the regulations provide for that purpose.

(5C) Without limiting the generality of the matters that may be taken into account by the Minister in determining whether a third country is an appropriate third country for the purposes of paragraph (2)(d) or (4)(d), the Minister may have regard to the following matters:



(a) whether the volume of trade from the country of export referred to in paragraph (2)(d) or the country first-mentioned in paragraph (4)(d) is similar to the volume of trade from the country of export to Australia; and

(b) whether the nature of the trade in goods concerned between the country of export referred to in paragraph (2)(d) or the country first-mentioned in paragraph (4)(d) is similar to the nature of trade between the country of export and Australia.

*(5D) The normal value of goods (the **exported goods**) is the amount determined by the Minister, having regard to all relevant information, if the exported goods are exported to Australia and the Minister is satisfied that the country of export has an economy in transition and that at least one of the following paragraphs applies:*

(a) both of the following conditions exist:

(i) the exporter of the exported goods sells like goods in the country of export;

(ii) market conditions do not prevail in that country in respect of the domestic selling price of those like goods;

(b) both of the following conditions exist:

(i) the exporter of the exported goods does not sell like goods in the country of export but others do;

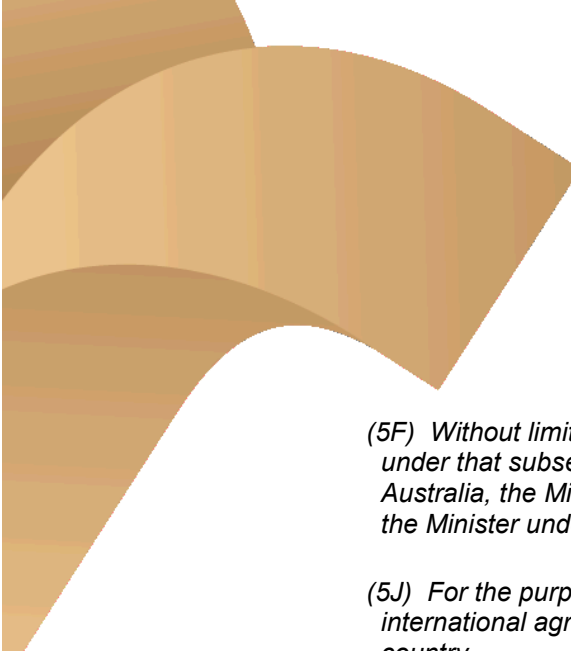
(ii) market conditions do not prevail in that country in respect of the domestic selling price of those like goods;

(c) the exporter of the exported goods does not answer questions in a questionnaire given to the exporter by the Commissioner under subsection 269TC(8) within the period described in that subsection or subsection 269TC(9) for answering questions;

(d) the answers given within the period mentioned in subsection 269TC(8), or the further period mentioned in subsection 269TC(9), by the exporter of the exported goods to a questionnaire given to the exporter under subsection 269TC(8) do not provide a reasonable basis for determining that paragraphs (a) and (b) of this subsection do not apply.

Note: Subsection 269TC(8) deals with the Commissioner giving an exporter of goods to Australia a questionnaire about evidence of whether or not paragraphs (a) and (b) of this subsection apply, with a specified period of at least 30 days for the exporter to answer the questions. Under subsection 269TC(9) the Commissioner may allow the exporter a further period for answering the questions.

(5E) To be satisfied that the conditions in paragraph (5D)(a) or (b) exist, the Minister must have regard to the matters (if any) prescribed by the regulations.



(5F) Without limiting the generality of subsection (5D), for the purpose of working out, under that subsection, the amount that is to be the normal value of goods exported to Australia, the Minister may determine that amount in a manner that would be open to the Minister under paragraph (4)(c), (d), (e) or (f) if subsection (4) were applicable.

(5J) For the purposes of fulfilling Australia's international obligations under an international agreement, regulations may be made to disapply subsection (5D) to a country.

(6) Where the Minister is satisfied that sufficient information has not been furnished or is not available to enable the normal value of goods to be ascertained under the preceding subsections (other than subsection (5D)), the normal value of those goods is such amount as is determined by the Minister having regard to all relevant information.

(7) For the purposes of this section, the Minister may disregard any information that he or she considers to be unreliable.

(7A) The application of subsection (5D) to goods that are exported to Australia from a particular country does not preclude the application of other provisions of this section (other than subsections (4) and (5)) to other goods that are exported to Australia from that country.

(8) Where the normal value of goods exported to Australia is the price paid or payable for like goods and that price and the export price of the goods exported:

(a) relate to sales occurring at different times; or

(b) are not in respect of identical goods; or

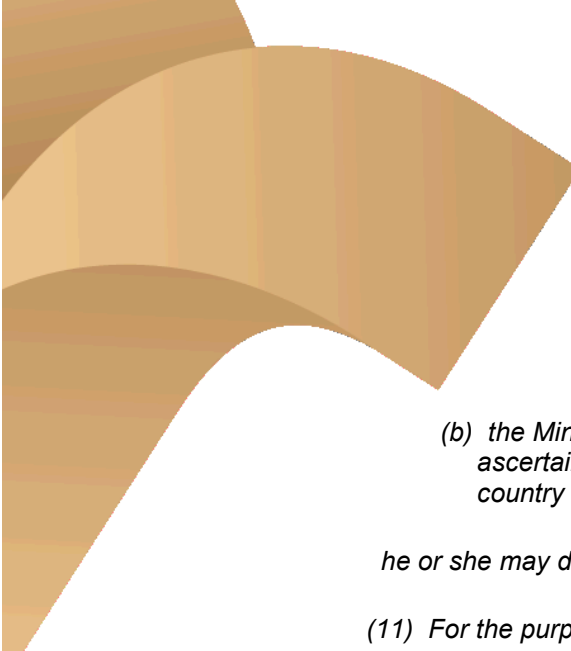
(c) are modified in different ways by taxes or the terms or circumstances of the sales to which they relate;

that price paid or payable for like goods is to be taken to be such a price adjusted in accordance with directions by the Minister so that those differences would not affect its comparison with that export price.

(9) Where the normal value of goods exported to Australia is to be ascertained in accordance with paragraph (2)(c) or (4)(e), the Minister must make such adjustments, in determining the costs to be determined under that paragraph, as are necessary to ensure that the normal value so ascertained is properly comparable with the export price of those goods.

(10) Where:

(a) the actual country of export of goods exported to Australia is not the country of origin of the goods; and



(b) the Minister is of the opinion that the normal value of the goods should be ascertained for the purposes of this Part as if the country of origin were the country of export;

he or she may direct that the normal value of the goods is to be so ascertained.

(11) For the purposes of subsection (10), the country of origin of goods is:

(a) in the case of unmanufactured raw products--the country of which they are products; or

(b) in any other case--the country in which the last significant process in the manufacture or production of the goods was performed.

(14) If:

(a) application is made for a dumping duty notice; and

(b) goods the subject of the application are exported to Australia; but

(c) the volume of sales of like goods for home consumption in the country of export by the exporter or another seller of like goods is less than 5% of the volume of goods the subject of the application that are exported to Australia by the exporter;

the volume of sales referred to in paragraph (c) is taken, for the purposes of paragraph (2)(a), to be a low volume unless the Minister is satisfied that it is still large enough to permit a proper comparison for the purposes of assessing a dumping margin under section 269TACB.

CONCLUSION

Given the short frame involved from receiving the attached information within our extension, we are currently assessing the dumping margins and if appropriate, any countervailing involved, in relation to the transactions conducted over the respective time frames.

We will shortly provide our opinion in relation to our approach of assessing the suitable methodology of calculating the ultimate dumping and countervailing margins given the circumstances involved with the steel products exported from China by Sino Sources, as a new exporter. In addition, we naturally need to take into consideration the relevant factors involved with manufacture of the goods by Jianwei Tube, including the relevant external Hot Rolled Coil price issues that may need to be taken into consideration.

In the meantime, we look forward to receiving your favourable consideration of our Accelerated Exporter Review application.

Prepared by: Russell Wilkinson
Position: CEO
Company: Trusted Trader International
Date: 10 August 2017