

Received 01 September 2014



Australian Government
Anti-Dumping Commission

EXPORTER QUESTIONNAIRE

CERTAIN HOLLOW STRUCTURAL SECTIONS EXPORTED FROM THE KINGDOM OF THAILAND

INVESTIGATION PERIOD: 1 JULY 2013 TO 30 JUNE 2014

RESPONSE DUE BY: **30 AUGUST 2014**

CASE CONTACT:

CASE MANAGER: Mr Bora Akdeniz
TELEPHONE: +61 3 9244 8267
FAX: +61 3 9244 8902
EMAIL: operations4@adcommission.gov.au

ADDRESS FOR RESPONSE: Attention: Director Operations 4
Anti-Dumping Commission
Customs House
1010 La Trobe Street
Docklands Victoria 3095
AUSTRALIA

By email: operations4@adcommission.gov.au

Public Record Version

Please note that a non-confidential version of the reply to this questionnaire must also be provided.

TABLE OF CONTENTS

TABLE OF CONTENTS	3
ABBREVIATIONS	4
GLOSSARY OF TERMS.....	5
BACKGROUND AND GENERAL INSTRUCTIONS.....	11
SECTION A – COMPANY STRUCTURE AND OPERATIONS.....	19
A-1 Identity and communication	19
A-2 Representative of the company for the purpose of investigation	19
A-3 Company information.....	20
A-4 General accounting/administration information.....	21
A-5 Income statement.....	25
A-6 Sales.....	25
SECTION B – SALES TO AUSTRALIA (EXPORT PRICE).....	27
SECTION C – EXPORTED GOODS AND LIKE GOODS	33
SECTION D – DOMESTIC SALES.....	35
SECTION E – FAIR COMPARISON.....	40
E-1 Costs associated with export sales.....	41
E-2 Costs associated with domestic sales.....	43
E-3 Other Possible Adjustment Factors	48
E-4 Duplication	50
SECTION F – THIRD COUNTRY EXPORTS.....	51
SECTION G – COSTS AND CONSTRUCTED NORMAL VALUE	53
G-1. Production process and capacity.....	53
G-2. Cost accounting practices	54
G-3 Cost to make and sell on domestic market	56
G-4 Cost to make and sell GUC (Australian exports)	57
SECTION H – EXPORTER/PRODUCER’S DECLARATION	60
SECTION I - CHECKLIST.....	61

ABBREVIATIONS

the Act	the <i>Customs Act 1901</i>
the Commission	The Anti-Dumping Commission
GUC or 'the goods'	the goods the subject of the application (HSS)
HRC	hot-rolled coil
HRS	hot-rolled steel (both HRC and narrow strip collectively)
HSS	certain hollow structural sections
the investigation period	1 July 2013 to 30 June 2014
ATM	Austube Mills Pty Ltd
Thailand	the Kingdom of Thailand

GLOSSARY OF TERMS

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

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 GUC 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

(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.

Constructed value

In cases where domestic prices paid for the GUC in the country of export cannot be used for the determination of normal value, ie. when there are no sales 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 GUC 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 GUC. It is the sum of direct materials, direct labour and factory overheads.

Cost to make and sell

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 GUC was performed.

Date of sale

Anti-Dumping Commission (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 GUC 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 GUC 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.

Factory overheads

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

Goods under consideration (GUC or 'the goods')

The goods subject to the anti-dumping and countervailing application. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

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 sellers premises)

Public Record Version

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 customers 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 GUC 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 GUC or that, although not alike in all respects have characteristics closely resembling those of the GUC. The term 'like goods' also refers to the GUC 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 GUC. 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.

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.

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 GUC 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.

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 GUC 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 GUC. 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.

BACKGROUND AND GENERAL INSTRUCTIONS

1. Background

Following an application by Australian Tube Mills Pty Ltd (ATM), an Australian industry member, the Anti-Dumping Commission (the Commission) has initiated:

an investigation into allegations that certain hollow structural sections (HSS) from the Kingdom of Thailand (Thailand) have been exported to Australia at dumped prices, and because of that dumping, material injury has been caused to an Australian industry producing like goods.

A notice advising initiation of the investigation and review was published in *The Australian* on 21 July 2014. Anti-Dumping Notice (ADN) No. 2014/59 outlining the details of the investigation and the procedures to be followed during the investigation can be accessed on the Commission's website at www.adcommission.gov.au.

2. The goods under consideration (GUC)

Description

The goods under consideration (GUC or 'the goods') are:

Certain electric resistance welded pipe and tube made of steel, comprising circular and non-circular hollow sections in galvanised and non-galvanised finishes, whether or not including alloys. The goods are normally referred to as either CHS (circular hollow sections) or RHS (rectangular or square hollow sections). The goods are collectively referred to as HSS (hollow structural sections). Finish types for the goods include pre-galvanised, hot-dipped galvanised (HDG), and non-galvanised HSS.

Sizes of the goods are, for circular products, those exceeding 21 mm up to and including 165.1 mm in outside diameter and, for oval, square and rectangular products those with a perimeter up to and including 950.0 mm. CHS with other than plain ends (such as threaded, swaged and shouldered) are also included within the goods coverage.

The application includes the following information to clarify the nature of the GUC.

Finishes

All HSS regardless of finish is included in the application. Finish types for the goods include in-line galvanised (ILG), pre-galvanised, hot-dipped galvanised (HDG) and non-galvanised HSS. Non-galvanised HSS is typically of painted, black, lacquered or oiled finished coatings.

CHS with other than plain ends (such as threaded, swaged and shouldered) are also included in the application.

Excluded goods

The following categories are excluded from the GUC:

- conveyor tube made for high speed idler rolls on conveyor systems, with inner and outer fin protrusions removed by scarfing (not exceeding 0.1mm on outer surface and 0.25mm on inner surface), and out of round standards (i.e. ovality) which do not exceed 0.6mm in order to maintain vibration free rotation and minimum wind noise during operation);
- precision RHS with a nominal thickness of less than 1.6 mm (i.e. not used in structural applications); and
- stainless steel CHS and RHS sections.

Tariff classification

The application stated that the GUC are classified to the following tariff subheadings:

- 7306.30.00 (statistical codes 31, 32, 33, 34, 35, 36 and 37);
- 7306.50.00 (statistical code 45);
- 7306.61.00 (statistical codes 21, 22, 25 and 90); and
- 7306.69.00 (statistical code 10).

The goods exported to Australia from Thailand under the Thailand Free Trade Agreement are free from duty as of 1 January 2010.

There are numerous Tariff Concession Orders applicable to the relevant tariff subheadings.

3. Investigation period

The existence and amount of any subsidy and/or dumping in relation to HSS exported to Australia from Thailand will be determined on the basis of an investigation period from **1 July 2013 to 30 June 2014** (hereinafter referred to as 'the investigation period').

The Commission will examine details of the Australian market from 1 July 2011 for injury analysis purposes.

4. Why you have been asked to fill out this questionnaire?

Either; the application, an importer of HSS or data contained within the Commission's commercial database has identified you as a potential exporter of HSS to Australia during the investigation period.

Consequently, the Commission has forwarded you this questionnaire and the associated spreadsheet '*HSS Exporter Questionnaire – THAILAND– accompanying spreadsheet*' to provide you with the opportunity to participate and cooperate with its investigation.

The Commission may use information provided by exporters to determine:

- the normal values and export prices of the GUC over the investigation and review periods; and
- whether HSS exported by your company to Australia was dumped.

You may make separate submissions concerning any other matter relevant to the Commission's inquiries.

The Commission's investigation will be carried out under the provisions of Part XVB of the Act. These provisions reflect the World Trade Organisation (WTO) *Anti-Dumping Agreement* and the *Agreement on Subsidies and Countervailing Measures*.

5. What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond the Commission may be required to rely on information supplied by other parties in making its assessments as to whether HSS exported to Australia was dumped and/or subsidised (this may include information supplied by the Australian industry).

If you do not provide all of the information sought, or if you do not allow the Commission to verify the information you provide (see below), we may deem that you did not cooperate with the investigation.

It is the Commission's objective to arrive at a recommendation to the Minister based on a full knowledge of all relevant facts. This can only be achieved if exporters cooperate. The Commission considers that your interests would be best served by fully completing the questionnaire.

6. If you decide to respond

Should you choose provide a response to this questionnaire, please note the following.

Public Record Version

Confidential and non-confidential versions

If you choose to respond to this questionnaire, you are required to lodge a confidential and a non-confidential version of your submission by the due date (due date is specified on front cover).

In submitting these versions, please ensure that each page of the information you provide is clearly marked either “**IN-CONFIDENCE**” or “**NON-CONFIDENTIAL**” in the header and footer.

All information provided to the Commission in confidence will be treated accordingly. The non-confidential version of your submission will be placed on the public record, which all interested parties can access.

Your non-confidential submission must contain sufficient detail to allow a reasonable understanding of the substance of the confidential version. If, for some reason, you cannot produce a non-confidential summary, contact the investigation Case Manager (see contact details on page 1 of this questionnaire).

The non-confidential version of your submission will be placed on the public record. The public record is available to all interested parties who may comment on the material on the public record. Other interested parties have the opportunity to comment on issues you have raised.

It is not expected that the non-confidential version of your submission would include commercially sensitive information. However it must contain sufficient detail to allow a reasonable understanding of the substance of the confidential version. If, for some reason, you cannot produce a non-confidential version, please contact the investigation Case Manager.

You can access the public record electronically online at <http://www.adcommission.gov.au/cases/default.asp>

Declaration

You are required to make a declaration that the information contained in your submitted questionnaire is complete and correct. You must return the signed declaration of an authorised official at Section J of this questionnaire with your response.

Consultants/parties acting on your behalf

If you intend to have another party acting on your behalf please advise the Commission of the relevant details.

The Commission will generally require written authorisation from exporters and manufacturers for any party acting on its behalf.

7. 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.

There is a statutory time limit imposed for the investigation. The Commission may not be able to consider submissions received after the due date if to do so would prevent meeting the statutory reporting requirements.

The Commission would encourage you to make contact with the Case Manager (see contact details on front cover) if you need any assistance in completing the questionnaire.

If you intend to lodge a submission but cannot do so by the due date please advise the Case Manger as soon as possible.

In considering whether or not to grant an extension of time, regard is had to the following:

- a) difficulties in translation of documentation, including the exporter questionnaire;
- b) availability of key staff;
- c) public holidays; or
- d) any circumstance outside the company's control.

The Commission may consider granting a small extension of time for lodgement of your submission if you provide a sufficient reason as outlined above.

You may lodge your response by mailing it to the address for lodgement shown on the front cover of this questionnaire, with data requested in electronic format on an included CD-ROM (see point 11. below).

Alternatively you are welcome to lodge your response by email. The email address for lodgement is shown on the front cover of this questionnaire. If you lodge by email you are still required to provide a confidential and a non-confidential version of your submission by the due date.

8. Verification of the information that you supply

After you have submitted the questionnaire and the Commission is satisfied that the information you have provided is sufficiently complete and warrants verification, the Commission may seek to visit your company to verify the information provided.

Once the information you have provided is verified, the Commission can rely on that information in forming its conclusions in relation to the inquiry.

Verification visits may take several days.

Public Record Version

During this verification, we will seek to examine in detail your company's records in respect of the GUC and will ask for copies of documents relating to the manufacture and sale of the GUC. You will need to ensure that any supplementary material such as spreadsheets, calculations etc that you used to prepare or compile your response are available. 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 that you may want to ask. We will also ask you to assist in the preparation of a non-confidential copy of the report for the public record.

9. 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 GUC. |
| 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. This may be particularly relevant if you have not exported to Australia in significant volumes in more recent times. |
| Section G | Costs to make and sell, for exports to Australia and for the domestic market. |
| Section H | Your declaration |
| Section I | Submission checklist |

10. 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.
- All documents and source material submitted in response to this questionnaire, including financial statements, must be translated into English.
- 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.
- You should retain all work sheets used in answering the questionnaire, in particular those linking the information supplied with management and accounting records. This will help to verify the information.
- Clearly identify all units of measurement and currencies used. Apply the same measurement consistently throughout your response to the questionnaire.

11. Instructions on providing electronic data

- It is important that, where requested, information is submitted in electronic format on a CD-ROM.
- Alternatively electronic data can be submitted directly by email to the email address shown on the front cover of this questionnaire.
- The data must be created as spreadsheet files, preferably in Microsoft Excel (2010, 2007 or 2003), or alternatively in an Excel compatible format (for example, Excel can normally access data in Dbase or as an ASCII file).
- The Excel files must be compatible to the USA version.
- If you cannot present electronic data in the requested format contact the investigation Case Manager as soon as possible.
- Responses to questions should be as accurate and complete as possible, and attach all relevant supporting documents, even where not specifically requested in this questionnaire.

Please note that answers such as: "Not Applicable" or an answer that only refers to an exhibit or an attachment may not be considered by the Commission to be adequate. We therefore suggest that in answering the questions you outline the key elements of your response in the primary submission document, rather than merely pointing to supporting documents of varying degrees of relevance and reliability as your answer.

12. Further information

Before you respond to the questionnaire you should read all the documentation that we have included with this questionnaire, including:

- Australian Customs Dumping Notice 2014/59 notifying the initiation of the investigation.

Public Record Version

It is also recommended that you access and read the non-confidential version of ATM's application, which is available online on the Electronic Public Record (<http://www.adcommission.gov.au/cases/default.asp>).

If you require further assistance, or you are having difficulties completing your submission, please contact the investigation Case Manager.

Please note that the Commission may send you a supplementary questionnaire if it needs to clarify matters provided by you in response to this questionnaire or to seek new information.

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: **Sahathai Steel Pipe Public Company Limited**
78 Moo 3 Poochao Road, Bangyapraek,
Phrapradaeng, Samuthprakarn 10130 Thailand
Telephone: **+6623859023**
Facsimile number: **+6623859288**
E-mail address of contact person: **methita@sahathai.com**

Factory:

Address: **Same as above**
Telephone: **Same as above**
Facsimile number: **Same as above**
E-mail address of contact person: **Same as above**

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]
Organisation: [REDACTED]
Position: [REDACTED]
Address: [REDACTED]
Telephone: [REDACTED]
Facsimile/Telex number: [REDACTED]
E-mail address of contact person: **jack@itada.com.au**

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 (eg. company, partnership, sole trader)? Please provide details of any other business names that you use to export and/or sell goods.

Sahathai Steel Pipe Co., Ltd. was incorporated under the Thai Civil and Commercial Code as a limited company on April 1, 1968. The Company registered the change of its status to a public company and the change of its name, from “Sahathai Steel Pipe Co., Ltd.” to “Sahathai Steel Pipe Public Company Limited”, with the Department of Business Development, Ministry of Commerce on 27 June 2005.

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).

Please see Sahathai Shareholder’s List-Conf Exhibit No 1

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

Sahathai is not a subsidiary of another company. Therefore, this is not applicable.

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

As per above -Not applicable.

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

Sahathai’s affiliated companies are all independent. Therefore, this is not applicable. However, Saha Thai has two wholly owned subsidiaries, [REDACTED] and [REDACTED]

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

Sahathai is not a subsidiary of another company and Sahathai’s affiliated companies are all independent. Therefore, this is not applicable.

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

Public Record Version

Sahathai is engaged in the manufacturing and distributing of steel pipes, including black pipes, water pipes, lip channel steel, furniture steel tubes, square and rectangular tubing.

8. If your business does not perform all of the following functions in relation to GUC, 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
 - export to countries other than Australia.

Sahathai does perform all above functions in relation to GUC.

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

Please see Sahathai's internal organisation chart. Conf Exhibit No 2

10. Provide a list of your business' Board of Directors.

Please see Sahathai's board of director list-Conf. Exhibit No 3

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

Sahathai doesn't create annual report. Therefore, only Sahathai's brochure is available.-Conf Exhibit No 4 refers.

12. Provide details of all transactions between your company and all related parties. For example:

- Suppling/selling completed or partially completed products.
- Suppling/selling raw materials.
- Performing management functions (including any financial functions).
- Processing (including toll processing) of any raw materials, intermediary or completed products.
- Trading in products/materials supplied by related parties.

Details are on page 19, 'RELATED PARTY TRANSACTIONS', of Sahathai Steel Pipe Auditor's Report and Consolidated Financial Statement for the Year Ended 31 December 2013 being Conf. Exhibit No 5 attached.

A-4 General accounting/administration information

1. Indicate your accounting period.

Public Record Version

Sahathai's accounting period is calendar year, from 1 January to 31 December.

2. Indicate the address where the financial records are held.

**Sahathai Steel Pipe's financial records are held at
78 Moo 3 Poochao Road, Bangyapraek,
Phrapradaeng, Samuthprakarn 10130 Thailand**

3. 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 GUC.

These documents should relate to:

- the division or section/s of your business responsible for the production and sale of the GUC, and
- the company overall.

Sahathai has provided documents:

-Chart of Accounts is Conf. Exhibit No 6.

-Audited Consolidated Financial Year 2013 is Conf Exhibit No 5.

-Audited Consolidated Financial Year 2012 is Conf. Exhibit No 7

-Auditor Report 1ST quarter 2014-March 2014 is Conf. Exhibit No 8

-Auditor Report 2nd quarter 2014- June 2014 is Conf Exhibit No 9

-Internal Financial summary Year 2012 to June 2014 is Conf Exhibit No 10

3. 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 relevant taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

Accounts are audited.

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

Sahathai Steel Pipe's financial statements have been officially prepared in Thai in accordance with the Thai Generally Accepted Accounting Principles under the Accounting Act B.E. 2543 and Thai Accounting Standards promulgated under the Accounting Professions Act B.E. 2547 and the financial reporting requirements promulgated by the Securities and Exchange Commission under the Securities and Exchange Act B.E. 2535.

5. 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 (eg last in first out –LIFO, first in first out- FIFO, weighted average);

Details are on page 12, 'Inventories', of Sahathai Steel Pipe Auditor's Report and Consolidated Financial Statement for the Year Ended 31 December 2013. Conf Exhibit No 5 refers.

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

Costing methods are combination of actual cost and standard cost. Allocation methods are determined by cost drivers of each product.

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

Damaged or sub-standard Goods are valued at net realizable value.

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

Scrap, by products or joint products are valued at net realizable value.

- valuation and revaluation methods for fixed assets;

Details are on page 12, 'Property, plant and equipment', of Sahathai Steel Pipe Auditor's Report and Consolidated Financial Statement for the Year Ended 31 December 2013. Conf exhibit No 5 refers.

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

Public Record Version

Details are on page 12, 'Property, plant and equipment', of Sahathai Steel Pipe Auditor's Report and Consolidated Financial Statement for the Year Ended 31 December 2013. Conf exhibit No 5 refers.

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

Details are on page 13, 'Foreign currency translation', of Sahathai Steel Pipe Auditor's Report and Consolidated Financial Statement for the Year Ended 31 December 2013. Conf Exhibit No 5 refers.

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

Details are on page 13, 'Foreign currency translation', of Sahathai Steel Pipe Auditor's Report and Consolidated Financial Statement for the Year Ended 31 December 2013.

- inclusion of general expenses and/or interest;

The general expenses and interest are reported separately in accordance with the Thai Generally Accepted Accounting Principles.

- provisions for bad or doubtful debts;

There were none during period of investigation. Therefore, this is not applicable.

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

There was no such event during period of investigation. Therefore, this is not applicable.

- costs of plant closure;

There was no such event occurs during period of investigation. Therefore, this is not applicable.

- restructuring costs;

There was no such event during period of investigation. Therefore, this is not applicable.

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

By-products and scrap materials are [REDACTED]

- effects of inflation on financial statement information.

There was no such event during period of investigation. Therefore, this is not applicable.

6. 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.

Details are on page 8, ‘Basis of financial statement preparation’, of Sahathai Steel Pipe Auditor’s Report and Consolidated Financial Statement for the Year Ended 31 December 2013. Conf. Exhibit No 5 refers.

A-5 Income statement

Complete the spreadsheet entitled ‘**Income statement**’ within the *HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

Explain how costs have been allocated between all products and the GUC within these calculations.

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.

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

Sahathai’s accounting system doesn’t assign account codes specifically to product codes. Therefore, Sahathai can complete only ‘All products’ column.

Conf Exhibit-A.5 response refers.

A-6 Sales

Complete the spreadsheet entitled ‘**Turnover**’ within the *HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet* provided alongside this questionnaire.

Public Record Version

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

In completing the sheet, use the currency in which your accounts are kept.

This information will be used to verify the cost allocations to the GUC in Section G.

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

Sahathai has completed the spreadsheet entitled 'Turnover' as requested. Conf exhibit No A-6 .

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 another level (e.g. ex factory).

*You should report prices of **all GUC 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 explanation 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.*

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

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

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

- (a) Describe how the GUC are sent to each customer in Australia, including a diagram if required.

Please see Sahathai’s sales flow chart. Conf exhibit B-2.

- (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.

Sahathai communicates directly to Australian [REDACTED]. Therefore, there is no party in the distribution chain. Commission is not applicable.

Public Record Version

- (c) Explain who retains ownership of the GUC at each stage of the distribution chain. In the case of delivered duty paid (DDP) sales, explain who retains ownership when the GUC enter Australia.

Please see Sahathai's sales flow chart. Conf. exhibit B-2

- (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).

Not Agency or Distributor agreements in place.

- (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.

Sahathai's sales processes are simply explained as follows:

- 1. Our management negotiates sales quantity and value with customers.**
- 2. After we agree on sales quantity and value, customers would release purchase contract to Saha -Thai.**
- 3. Once production is completed, the export department would grant invoices and associated documents and process delivery.**
- 4. Saha Thai would receive payment [REDACTED]**

- (f) State whether your firm is related to any of its Australian customers. Give details of any financial or other arrangements (eg free goods, rebates, or promotional subsidies) with the customers in Australia (including parties representing either your firm or the customers).

Sahathai is not related to any of Australian customers.

- (g) Details of the forward orders of the GUC (include quantities, values and scheduled shipping dates).

Information is unavailable.

- 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.

Public Record Version

All Australian sales are sold through the same channel. Therefore, this is not applicable.

- B-4** Complete the spreadsheet entitled ‘**Australian sales**’ within the *HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet* provided alongside this questionnaire.

This spreadsheet is to list **all** shipments (i.e. transaction by transaction) to Australia **of the GUC** (do not include non-GUC items) in the investigation period.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

The below table provides information as to what is meant by each column heading within the spreadsheet.

Column heading	Explanation
Customer name	names of your customers
Level of trade	the level of trade of your customers in Australia
Product code	Code used in your records for the model/grade/type identified. A product code must be a unique identifier of that product. Explain the product codes in your submission.
Type (CHS / RHS)	Indicate whether it is a circular or rectangular (including square) type HSS
Standard	Production standard of the HSS (TIS 107, AS/NZ 1163 etc.)
Width	Width of the tube (or insert radius if circular pipe)
Height	Height of the tube (leave blank if circular pipe)
Length	Length of the product
Nominal Thickness	Nominal (theoretical) thickness
Actual Thickness	Actual (or target) thickness
Grade	Grade of product i.e. 350CL0 or 250C etc.
Finish	identify the finish of the HSS sold
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 eg. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	agreed payment terms eg. 60 days=60 etc
Quantity (pcs)	Number of pieces of HSS sold (if shown on the invoice).
Theoretical Weight	Weight of this product shown on the invoice.
Target Weight	Total target weight of this product in the shipment
Actual Weight	Total actual weight of this shipment (from scale readings)
HRC Code	The raw material code of the HRC used in production of this product (the code in your accounting and/or MRP systems for

Public Record Version

	the type of HRC used in manufacturing of this product)
Gross invoice value	gross invoice value shown on invoice <i>in the currency of sale, excluding taxes.</i>
Discounts	if applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Rebates	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	the net invoice value expressed in your domestic currency as it is entered in your accounting system
Other discounts	The actual amount of discounts not deducted from the invoice. Show a separate column for each type of 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*	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 or installation costs.
Commissions*	Commissions paid. If more than one type is paid insert additional columns of data. Indicate in your response to question B2 whether the commission is a pre or post exportation expense having regard to the date of sale.
Other factors*	any other costs, charges or expenses incurred in relation to the exports to Australia (include additional columns as required). See question B5.

Notes

* These costs are further explained in section E-1.

** FOB export price and Ocean Freight:

Public Record Version

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.

Sahathai has completed the spreadsheet entitled ‘Australian sales’ per request. CONF B-4 attached.

- 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 within the ‘Australian sales’ spreadsheet (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.

No other costs etc incurred.

- B-6** For each type of discount, rebate, or 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.

Sahathai did not grant discount, rebate, or allowance offered on export sales to Australia during period of investigation.

- 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.

Sahathai did not grant credit notes to customers in Australia during period of investigation.

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

Import	Amount of import duty paid in Australia
--------	---

Public Record Version

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

The delivery term of Sahathai's Australian sales [REDACTED]. Therefore, this is not applicable.

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 GUC from factory to Australia, including inland freight contract;
- marine insurance expenses; and
- letter of credit, and bank documentation, proving payment.

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

Sahathai has provided two shipments of goods exported to Australia per request. Conf Attachments B-9-1, B-9-2 refer.

SECTION C – EXPORTED GOODS AND LIKE GOODS

C-1 Fully describe all of the GUC 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.

The GUC exported to Australia are both CHS and RHS which meet AS1163, AS1074 and Extra Light standards. Please see list of model of goods exported to Australia. Conf. Exhibit refers.

C-2 List each model/type of the good exported to Australia (these models should cover all models listed in spreadsheet “**Australian Sales**” – See section B of this questionnaire).

Please see list of model of goods exported to Australia.

C-3 If you sell like goods on the domestic market, for each model/type 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 those goods sold domestically (ie. the like goods – see explanation in glossary) are not identical to the GUC exported to Australia.

This should be done by completing the spreadsheet entitled ‘**Like goods**’ within the *HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet* provided alongside this questionnaire, detailing as follows:

EXPORTED MODEL	DOMESTIC MODEL	IDENTICAL?	DIFFERENCES
Product code of each model of the GUC exported to Australia	Product code of comparable model sold on the domestic market of the country of export	If goods are identical indicate “YES”. Otherwise “NO”	Where the good exported to Australia is not identical to the like goods in terms of: GRADE; SIZE; WALL THICKNESS; SHAPE; FINISH, describe the specification differences. If it is impractical to detail specification differences in this table refer to documents which outline differences

Public Record Version

Sahathai has completed the spreadsheet entitled 'Like goods' per request. Conf. exhibit No C-3 refers

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

Please see list of model of goods sold on the domestic market.

Conf Exhibit C-4

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 of like goods to the GUC made during the investigation period by **your company and through your related companies** 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 Manager **before** completing the questionnaire.*

If the Case Manager agrees that it is not possible to obtain a complete listing he or she will consider a method for sampling that meets the Commission 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 Manager 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.

Sahathai's home market sales are made direct from the mill or factory-operated warehouse to our customers. Please see Sahathai's sales flow chart.

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

Sahathai's home market sales are sold through the same channel. Therefore, this is not applicable.

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.

Sahathai has no policy to fix the price as well as payment term. All home market sales are negotiated independently, vary with circumstances. After negotiation, customers would place an order. Domestic sales department may sell from stock or pass the order to factory for production, then grant invoices and process delivery. Price includes the cost of delivery to customer.

D-4 Complete the spreadsheet entitled '**Domestic sales**' within the *HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet* provided alongside this questionnaire.

This spreadsheet is to list **all domestic sales of like goods** (i.e. transaction by transaction) in the investigation period (do not include non-GUC items) **sold by your company and through your related companies**.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

The below table provides information as to what is meant by each column heading within the 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
Product code	Code used in your records for the model/grade/type identified. A product code must be a unique identifier of that product. Explain the product codes in your submission.
Type (CHS / RHS)	Indicate whether it is a circular or rectangular (including square) type HSS
Standard	Production standard of the HSS (TIS 107, AS/NZ 1163 etc.)
Height	Height of the tube (leave blank if circular pipe)
Length	Length of the product

Public Record Version

Nominal Thickness	Nominal (theoretical) thickness
Actual Thickness	Actual (or target) thickness
Grade	Grade of product i.e. 350CL0 or 250C etc.
Finish	identify the finish of the HSS sold
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.
Dispatch Date	Date of dispatch
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.
Delivery terms	Delivery terms eg. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	agreed payment terms eg. 60 days=60 etc
Quantity (pcs)	Number of pieces of HSS sold (if shown on the invoice).
Theoretical Weight	Weight of this product shown on the invoice.
Target Weight	Total target weight of this product in the shipment
Actual Weight	Total actual weight of this shipment (from scale readings)
HRC Code	The raw material code of the HRC used in production of this product (the code in your accounting and/or MRP systems for the type of HRC used in manufacturing of this product)
Gross invoice value	gross invoice value shown on invoice <i>in the currency of sale, excluding taxes.</i>
Discounts	if applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Rebates	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.
Net invoice value	the net invoice value expressed in your domestic currency as it is entered in your accounting system
Other discounts	The actual amount of discounts not deducted from the invoice. Show a separate column for each type of discount.
Packing*	Packing expenses
Inland transportation costs*	inland transportation costs included in the selling price.
Handling, loading & 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 or installation costs.
Commissions*	Commissions paid. If more than one type is paid insert additional columns of data. Explain in your response to

Public Record Version

	this question in detail in D-6.
Other factors*	any other costs, charges or expenses incurred in relation to the sale. (include additional columns as required). See question B5.

Notes

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

Sahathai has completed the spreadsheet entitled 'Domestic Sales' per request. Conf. exhibit D-4 spreadsheet refers.

- 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.

No other costs etc incurred..

- 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.

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.

Sahathai does not have a policy to provide commission, discount, rebate and allowance on domestic sales. However, during period of investigation, there were discounts occurred occasionally. These discounts are on the sales invoice.

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.

Sahathai granted credit notes to correct error on price or quantity. Therefore, those credit notes are not reported as a discount or rebate.

- 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

Public Record Version

- bank documentation showing proof of payment.

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

Sahathai has provided two domestic sales per request.

Conf Exhibits D-7-1 and D.7.2 refer.

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 (ie. 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.

E-1 Costs associated with export sales

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

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.

The inland transportation costs are included in handling, loading and ancillary expenses. Conf Exhibit E.1.2 refers.

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.

Please see Export Selling Expense spreadsheet. Conf Exhibit No E.1.2 refers.

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 eg, 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.

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'.

In normal course of business, Sahathai treats packing costs as cost of production, not selling expense. Therefore, this is not applicable.

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.

No Commissions apply.

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.

No Warranties etc apply.

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.

No OTHER factors require adjustment.

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.

The exchange rates over an investigation period are reported in Conf B - 4 Australian Sales spreadsheet.

E-2 Costs associated with domestic sales

(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 (ie. an amount for selling general and administrative costs (S G & A) plus profit).

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

Please see list of model of goods exported to Australia and list of model of goods sold on domestic market. Conf Exhibit No 4 refers.

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 GUC), or
- if such internal taxes and duties have been paid and are later remitted upon exportation to Australia;

Public Record Version

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).

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 GUC 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 please provide **full** details about the operation of the scheme as well as providing the information requested above.

████████████████████ (conf text deleted)

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.

Public Record Version

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

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.

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.

Not considered relevant or applicable;

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 borrowing's 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.

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 system,¹ 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.

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.

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.

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.

Please see domestic transportation spreadsheet. Conf Exhibit E.1.1 refers.

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.

For reasons expressed, this cost is included in the CTM.

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**”.

In normal course of business, Sahathai treats packing costs as cost of production, not selling expense. Therefore, this is not applicable.

8. **Commissions**

For any commissions paid in relation to the domestic sales:

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

Public Record Version

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

NO Comissions payable.

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.

No Waranties etc apply.

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*.

No other factors are relevant.

E-3 Other Possible Adjustment Factors

For the Commission to fully understand any other possible adjustment factors, please complete the spreadsheet entitled ‘HRC Purchases’ and ‘Theoretical to Actual Weight’ tabs within the HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet provided alongside this questionnaire.

Please list all of your hot rolled coil (HRC) purchases starting from 01/01/2013 in the format shown at ‘HRC Purchases’ tab.

Public Record Version

Please also provide a table with the format shown at 'Theoretical to Actual Weight' tab listing the theoretical weights and actual weights of all the products sold both domestically and sold to Australia during the investigation period.

Provide the completed spreadsheets in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

The below table provides information as to what is meant by each column heading within the 'HRC Purchases' tab.

Column Heading	Explanation
HRC Material Code	The raw material code of the HRC in your accounting and/or MRP systems for this HRC thickness - grade combination
Date of purchase	Purchase date of HRC. Please start list all HRC purchases from 1/1/2013
Supplier name	Name of HRC supplier. If purchased from a distributor rather than the manufacturer, write the distributor's name.
Domestic Purchase or Import?	Indicate whether it was purchased locally or imported
Supplier's Invoice No	Indicate the supplier's invoice number. If your accounting system do not keep track of the suppliers invoice number, put your order number or a similar unique identifier from your accounting system
Grade of HRC	Indicate the grade of the HRC purchased. If more than one grades are bought in one order, separate HRC's with respect to their grades and thicknesses.
Theoretical Weight of Quantity Purchased (tonnes)	The theoretical weight of HRC purchased
Actual Weight of Quantity Purchased (tonnes)	The actual weight of HRC purchased
Nominal Thickness (mm)	Nominal thickness of HRC purchased
Actual Thickness (mm)	Actual thickness of HRC purchased
Currency (USD or THB)	The currency of the invoice
Price per Tonne (USD or THB)	Purchase price per tonne
Total Price (USD or THB)	Total invoice price for the grade and thickness of HRC
Delivery terms	Indicate the delivery terms i.e FIS, ex-Factory etc.
Additional purchase costs (e.g. Inland transport)	Indicate any additional costs incurred with this purchase like inland delivery costs. If the costs are incurred for a group of products purchased, distribute the cost per line in a meaningful way like according to their weight.

Public Record Version

And the table provides information as to what is meant by each column heading within the 'Theoretical to Actual Weight' tab.

Column Heading	Explanation
Product Code	The code of product
Theoretical Weight	Theoretical weight of this product
Actual (Target) Weight	Actual weight of this product
Product Standard	The standard the product manufactured to. Insert "Commercial" for commercial (non-standard) products.

Sahathai has completed the spreadsheet entitled 'HRC Purchases' and 'Theoretical to Actual Weight' per request. Please be informed that Sahathai's [REDACTED] [REDACTED] [REDACTED].(conf text deleted) Conf Attachment HRC -1 refers

E-4 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.

SECTION F – THIRD COUNTRY EXPORTS

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 Complete the spreadsheet entitled ‘Third country sales’ within the HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet provided alongside this questionnaire.

This spreadsheet is to list **all export sales of like goods** (i.e. transaction by transaction) to countries other than Australia in the investigation period (do not include non-GUC items).

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

The below table provides information as to what is meant by each column heading within the 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 eg 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 eg. 60 days=60 etc
Shipment terms	Typical shipment terms to customers in the third country eg CIF, FOB, ex-factory, DDP etc.

Sahathai has completed the spreadsheet entitled ‘Third country sales’ per request.

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

Public Record Version

The third country sales of Sahathai are [REDACTED], which requires distinct differences in pipe and tube's specifications, different economics and different users and applications. Sahathai believes [REDACTED] [REDACTED] (conf text deleted)

SECTION G – COSTS AND CONSTRUCTED NORMAL 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 GUC - i.e. of the GUC 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 (GUC) 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 (eg. non-operating expenses not included elsewhere) associated with the GUC.

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

The production process for the GUC is described in summary below.

Slitting

Hot-rolled carbon steel coil purchased from outside suppliers is place on the slitting line, where it is uncoiled, slit into standard widths, and then recoiled for storage and handling convenience.

Forming

The slit coil hoops enter the forming line, where they are uncoiled and sent through a series of rollers which gradually bend and reform the flat steel strip into a continuous cylinder. The seam where the two edges of the coil meet is heated and then welded using the ERW process. Next, the bead of excess welding material is removed, and the pipe is sized to meet tolerance requirements. At the end of the forming line, the continuous length is cut to size.

End Finishing

Pipe that is to be threaded is put through a chaser type threading machine. Couplings are attached to some threaded pipe; other threaded pipe is sold without couplings

Surface Finishing

If the pipe is to be galvanized, it is transferred to the galvanizing line, where it is dipped in a bath of galvanizing material (primarily zinc).

If the pipe is to be painted, it is transferred to the painting line, where it is painted of painting material (primarily paint). A coat of protective varnish/light oil is applied to uncoated pipe.

Packing

The pipe is stencilled, bundled and strapped for shipping.

A flowchart of Sahathai's production process is provided in the company brochure.

All products manufactured using the same production facilities as those used for GUC.

Sahathai has categorized joint products as follows:

<u>Joint Product</u>	<u>Classification</u>	<u>Point at which Costs are Segregable</u>
Zinc scrap	By-product	Galvanizing
Steel scrap	By-product	Slitting/Forming/Threading

2. Complete the spreadsheet entitled 'Production' within the *HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

Sahathai has completed the spreadsheet entitled 'Production' per request.

G-2. Cost accounting practices

Public Record Version

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

Sahathai's management accounting system is prepared in accordance with the Thai Generally Accepted Accounting Principles (GAAP). Sahathai does not maintain a system for cost accounting system distinct from its general accounting system.

The broad concept of the cost accounting system for product valuation is Sahathai values direct labours and overhead expenses on standard cost basis, meanwhile material costs are valued on actual cost basis. All manufacturing costs incurred by Sahathai are recorded to accounts on the basis of actual costs. Therefore,

(conf text deleted)

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 (ie differences between standard and actual production costs) have been allocated to the GUC - and describe how those variances have been allocated.

As mentioned above, however, for the purpose of this response, Sahathai reported costs on actual cost basis (

(conf text deleted)

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

As mentioned above, however, for the purpose of this response, Sahathai reported costs on actual cost basis (

(conf text deleted)

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

Sahathai cost accounting system is

(conf text deleted)

5. For each profit/cost centre describe in detail the methods that your company normally uses to allocate costs to the GUC. 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.

Not applicable.

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

Sahathai's cost accounting system captures cost at the product number level which consists of pipe's standard, nominal pipe size, thickness, surface finishing, end finishing and length.

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

No such occurrences.

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

No start up event.

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.

Refer to (8) above.

G-3 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

1. Complete the spreadsheet entitled '**Domestic CTMS**' within the *HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

In doing so, provide the **actual unit cost** to make and sell **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 GUC. Provide documentation and worksheets supporting your calculations.

If you are unable to supply this information in this format, please contact the Case Manager for this investigation at the address shown on the cover of this questionnaire.

² The Commission applies the tests set out in s.269TAAD 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.

Please specify unit of currency.

Sahathai has completed the spreadsheet entitled 'Domestic CTMS' per request. It is reported in Thai Baht. Conf Exhibit G-3 refers.

G-4 Cost to make and sell GUC (Australian exports)

Complete the spreadsheet entitled '**Australian CTMS**' within the *HSS Exporter Questionnaire – THAILAND – accompanying spreadsheet* provided alongside this questionnaire.

Provide the completed spreadsheet in electronic format on CD-ROM (or via email) with your response. If formulas are used to calculate the field within this sheet, please ensure they remain included in the submitted version.

In doing so, provide the **actual unit cost** to make and sell **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 GUC. Provide documentation and worksheets supporting your calculations.

If you are unable to supply this information in this format, please contact the Case Manager for this investigation at the address shown on the cover of this questionnaire.

Please specify unit of currency.

Sahathai has completed the spreadsheet entitled 'Australian CTMS' as requested. It is reported in Thai Baht. Conf Exhibit G-4 refers.

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

G-5 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.

There are no cost differences on the same product code between goods sold to domestic market and those sold for export.

G-6 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.

The following list describes the differences between Sahathai accounting system and the product-specific cost reported in this response:

Revenues from [REDACTED]

- b. Domestic selling expenses have been transferred from G&A to selling expenses;
- c. Export selling expenses have been transferred from G&A to selling expenses.

(conf text deleted)

- G-7** In calculating the unit cost to make and sell, provide an explanation if the allocation method used (eg number, or weight etc) to determine the unit cost differs from the prior practice of your company.

In its normal accounting records, Sahathai tracks all production quantities on the basis of the [REDACTED]. In this response, Sahathai reported unit cost in weight basis, in order to compare unit cost between products.

- G-8** Major raw material costs:

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

Steel coil is only one raw materials used in production 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;

Sahathai purchase materials from outside parties.

- identify the supplier; and

Sahathai purchases from various suppliers, [REDACTED]

- show the basis of valuing the major raw materials in the costs of production you have shown for the GUC (eg market prices, transfer prices, or actual cost of production).

Sahathai values steel coil on actual cost basis.

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.

Public Record Version

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 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.

If the major input is purchased or supplied from an integrated production process you should provide detailed information on the full costs of production of that input.

SECTION H – EXPORTER/PRODUCER’S DECLARATION

I hereby declare that.....(company) did, during the period of investigation export the GUC 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.

or

I hereby declare that.....(company) did, during the period of investigation, produce the GUC which were exported to Australia by another company 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.

Name :

Signature :

Position in Company :

Date :

SECTION I - 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 – 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"/>
LIKE GOODS – comparison of goods sold domestically and exported to Australia	<input type="checkbox"/>
DOMESTIC SALES – list of all domestic sales of like goods	<input type="checkbox"/>
HRC PURCHASES – list of all HRC purchases from 1/1/2013	<input type="checkbox"/>
THEORETICAL to ACTUAL – theoretical weight to actual weight conversion table	<input type="checkbox"/>
DOMESTIC COSTS – costs of goods sold domestically	<input type="checkbox"/>
AUSTRALIAN COSTS – costs of goods sold to Australia	<input type="checkbox"/>
PRODUCTION – production figures	<input type="checkbox"/>
THIRD COUNTRY – third country sales	<input type="checkbox"/>

