

DRAFT – FOR DISCUSSION PURPOSES

**Investigation Case no. 362 (non-public communication)**

Dear Mr. Williams

We are in receipt of your letter, dated August 16, 2016 where we are invited to participate in the investigation of the Case no 362. While it is Sapa's general policy to cooperate with inquiries from authorities, we believe that in this particular case we have been addressed by mistake. Please allow us to briefly describe our business model:

Sapa Singapore Holding PTE Ltd is promoting building systems in South East Asia and Pacific region, including Australia. Our systems are full solutions consisting of aluminum profiles, accessories, fitting and rubber gasket. In addition, we provide related services such as software, technical documentation, fabrication details, training and manufacturing tools to support the system. The systems are represented by the following two brands TECHNAL and SAPA/DOMAL.

We operate with standard price lists on which we are applying a sales discount depending on the size of the project and individual commercial agreements with our customers. All parts except profiles are sourced from Europe, China or the Middle East.

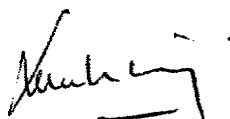
Our profiles are sourced from [REDACTED] external suppliers in Malaysia [REDACTED] and are shipped by sea freight directly to our customers (among others also to Australia). The pricing is based on manufacturing cost and the metal price according to the London Metal Exchange (LME). The profiles as sourced from these suppliers [REDACTED] are invoiced to the customers on the basis of the purchasing costs plus our additional margin [REDACTED] which reflects the Sapa building solution. We do not source extrusions from Vietnam to date.

We trust you will note based on our description, that we do not sell extrusions at a low price to Australian customers or to any other country in the area for that matter. [REDACTED]  
[REDACTED]  
[REDACTED]

Based on the above, we do not believe that we can contribute anything of value to your investigation. Please let us know if you are of a different view.

We ask you to treat this communication as non-public.

Kind regards



Xavier Courboin  
Managing Director – China/SEA/Australia/Pacific