

21 November 2017

Mr Tim King  
Case Manager  
Investigations 3  
Anti-Dumping Commission  
Level 35  
55 Collins Street  
Melbourne Victoria 3000

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## Public File

Dear Mr King

### **Investigation No. 442 – Aluminium extrusions exported from P R China by Guangdong Jiangsheng Aluminium Co., Ltd**

#### Introduction

I refer to Investigation No. 442 concerning exports of aluminium extrusions to Australia from China by Guangdong Jiangsheng Aluminium Co., Ltd (“Jiangsheng”). Capral Limited (“Capral”) seeks to highlight with the Anti-Dumping Commission (“the Commission”) what it considers relevant information relating to the affiliated parties of Jiangsheng.

#### Dumping Commodities Register

It is noted in the current version (5 October 2017) of the DCR that Guangdong Jiangsheng Aluminium Co Ltd was formerly identified as Tai Ao Aluminium Tai Shan Co Ltd. Jiangsheng exports to Australia either directly or through the following entities:

- Phoenix Endeavour Ltd;
- HDLS (HK) Ltd;
- Guangdong Yuenxin Mechanical & Electrical Equipment Import & Export Co. Ltd;
- Xiamen Juncheng Trade Co., Ltd.

#### Name Change

The Australian industry was notified in March 2017 that Tai Ao Aluminium (Taishan) Co Ltd had changed its name to Guangdong Jiangsheng Aluminium Co Ltd. At the same time, Tai Ao Aluminium (Australia) Pty Ltd changed its name to Guangdong Jiangsheng Aluminium (Australia) Pty Ltd (See Non-Confidential Attachment 1).

#### Related entities

According to company search reports requested by Capral, Jiangsheng has the same registered address as the former Tai Ao Aluminium Tai Shan Co Ltd (refer Confidential Attachment 2). The registered trademarks for Jiansheng include the Tai Ao Aluminium insignia. Jiangsheng has a single registered shareholder that is also the *‘legal representative, executive director and general manager’*.

According to the Tai Ao Aluminium Group Limited (“Tai Ao Group”) company search (same address as Tai Ao Aluminium (Taishan) Co., Ltd) it is the parent company of the following entities (refer Confidential Attachment 3):

- Fullwell Global Investments Limited (Confidential Attachment 4);
- Best Heyday Limited (Confidential Attachment 5);
- Art Link Global Investments (Confidential Attachment 6);
- Eternal Profit Holdings Limited (Confidential Attachment 7);
- Step Capital Investment Limited.

These subsidiary companies are each listed as having a British Virgin Islands address, with the parent nominated as the “*sales office for its associated company production facility located in China engage in manufacturing of aluminium extrusions and associated products*”.

The nominated ‘line of business’ for the subsidiary companies is ‘finance and investment’.

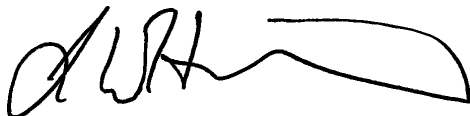
#### Arms-length sales

Jiangsheng exports aluminium extrusions manufactured in China to its related party Jiansheng Aluminium (Australia) Pty Ltd. It is anticipated that the Commission will examine whether the relationship of the exporter and the importer impacts the export price and how export price should be determined for related party sales to Australia.

The identified subsidiary companies each have functions associated with finance and investment (i.e. lending). It is not clear from the company search documentation, however, there exists a likelihood that the related party companies have provided capital to Jiangsheng – either directly or indirectly - and this must be quantified and identified as a cost of Jiangsheng operating its manufacturing business in China. It is Capral’s expectation that the Commission will examine the impact of the related entities on the Chinese exporter’s cost to manufacture the goods under investigation.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 8222 0113 or Capral’s representative Mr John O’Connor on (07) 3342 1921.

Yours sincerely



Luke Hawkins  
General Manager – Supply and Industrial Solutions

16 March 2017

## **NOTIFICATION OF CHANGE TO TRADING NAME**

Dear Customer,

We would like to inform you that Tai-ao Aluminium has changed its trading name. The changes to our two related entities are as follows:

### **Extrusion Factory**

**Tai-ao Aluminium (Taishan) Co Ltd** becomes **Guangdong Jiangsheng Aluminium Co Ltd**

### **Australian Representation**

**Tai-ao Aluminium (Australia) Pty Ltd** becomes **Guangdong Jiansheng Aluminium (Australia) Pty Ltd**

Please amend your records to reflect these changes (including account name for payments).

All other details and facets of our organisation remain unchanged.

Future correspondence such as drawings, sales contracts, invoices etc. will now be under the new trading names.

Thank you for your co-operation and continued support.

Yours sincerely,

Management