



EXPORTER QUESTIONNAIRE

GRINDING BALLS EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA

Period of Investigation: 1 OCTOBER 2014 – 30 SEPTEMBER 2015

Response due by: **24 DECEMBER 2015**
(Extended to 31 DECEMBER 2015)

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

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Anti-Dumping
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RETURN OF QUESTIONNAIRE DETAILS

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

Or by mail
(CD-ROM or USB):
Attention: Director Operations 3
Anti-Dumping Commission
GPO Box 1632
Melbourne VIC 3001
Australia

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THE GOODS UNDER CONSIDERATION

Goods Description

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

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

The applicants provide the following additional information:

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

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

Tariff classification

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

These goods are subject to 4 per cent Customs duty.

BACKGROUND AND GENERAL INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

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

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

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

What happens if you do not respond to this questionnaire?

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

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

Due date for response

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

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

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

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

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

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

Confidential and non-confidential submissions

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

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

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

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

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

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

[explanation of cost allocation through the divisions].

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

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Exporter's declaration

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

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

Verification of the information that you supply

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

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

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

If you do not manufacture the goods

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

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

If you do not export the goods

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

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

Outline of information required by this questionnaire

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

Some general instructions for preparing your response

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

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Instructions on providing electronic data

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

Further information

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

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

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

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: **Ms. Chen Ying**

Position in the company: **chief representative of Australia Branch**

Address: **No.297 Binjiang East Road, Jiangyin City, Jiangsu Province**

Telephone: **86-13812128736**

Facsimile number: **86-510-86191400**

E-mail address of contact person: **chenying@citicsteel.com**

Factory: **Jiangsu CP Xingcheng Special Steel Co., Ltd.**

Address: **No.58 Yan shan Road, Chengjiang Town, Jiangyin City,
Jiangsu Province**

Telephone: **86-13812128736**

Facsimile number: **86-510-86191400**

E-mail address of contact person: **chenying@citicsteel.com**

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: **Pu Lingchen, Guan Jian**

Address: **36-37/F, SK Tower, 6A Jianguomenwai Avenue, Chaoyang
District, Beijing 100022, P.R.China**

Telephone: **86-10-5957 2031**

Facsimile/Telex number: **86-10-6568 1022/1838**

E-mail address of contact person: **pulingchen@zhonglun.com,
guanjian@zhonglun.com**

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.

Answer:

The business name is Jiangsu CP Xingcheng Special Steel Co., Ltd. (herein after refer to as “CPSS” or “the Company”). It is a sino-foreign joint venture company. The Company has no other business name.

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

Answer:

The principal shareholders of CPSS are [Confidential*] and [Confidential*], who hold [Confidential*] and [Confidential*] of shares respectively.

[The above confidential information is related to ownership of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above confidential information is related to ownership of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

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[The above confidential information is related to ownership of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

Please refer to Exhibit A-3.5 [Confidential*] for chart of all associated corporate structure.

[The above exhibit is related to ownership of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

There is an operation and management agreement between [Confidential*] and [Confidential*]. Please refer to Exhibit A-3.6 [Confidential*] for the agreement.

[The above confidential information and exhibit is related to operating activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

CPSS is a producer of the product concerned, and it sells on domestic market and exports to Australia. [Confidential*]

[Confidential*]

[The above confidential information and exhibit is related to operating activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

- produce or manufacture

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- sell in the domestic market
- export to Australia, and
- export to countries other than Australia.

Answer:

The address of CP Trade is No. 1168 Nanjing West Road, Jingan District, Shanghai City.

The address of XCSS is No. 297 Binjiang East Road, Jiangyin City, Jiangsu Province, who is responsible for reissuance of invoice for all CPSS's export sales.

The address of CPSM is No. 297 Binjiang East Road, Jiangyin City, Jiangsu Province, who is responsible for reissuance of VAT invoice for all CPSS's domestic sales.

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

Answer:

Please refer to **Exhibit A-3.9** [Confidential*] for internal organisation chart of CPSS.

[The above exhibit is related to internal organisation structure of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

Please refer to **Exhibit A-3.10** for product brochure, so please refer to **Exhibit A-4.3.2** [Confidential*] for audit report of CPSS.

[The above exhibit is related to finance statements of CPSS, which is highly sensitive commercial information. CPSS is not a public list company, so disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

A-4 General accounting/administration information

1. Indicate your accounting period.

Answer:

The Company's accounting period is from January 1st to December 31st.

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

Answer:

The Company's financial records are kept at the address reported in response of question A-1.

3. Please provide the following financial documents for the two most recently completed financial years plus all subsequent monthly, quarterly or half yearly statements:
- chart of accounts;
 - audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);
 - internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods under consideration.

These documents should relate to:

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

Answer:

Please refer to Exhibit A-4.3.1 [Confidential*] for chart of accounts of CPSS.

Please refer to Exhibit A-4.3.2.1/2 [Confidential*] for audit reports of 2013 and 2014 of CPSS.

Please refer to Exhibit A-4.3.3 [Confidential*] for monthly balance sheets and income statements of October and November of 2015.

CPSS does not have the internal financial statements and does not prepare the financial statements for division or section separately.

[The above exhibit is related to finance statements of CPSS, which is highly sensitive commercial information. CPSS is not a public list company, so disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

This question is not applicable.

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

Answer:

CPSS and its related companies' accounting practices are consistence with the generally accepted accounting principles in China.

6. Describe:

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

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

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- 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);

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- valuation and revaluation methods for fixed assets;

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

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[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- inclusion of general expenses and/or interest;

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- provisions for bad or doubtful debts;

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

Not applicable.

- costs of plant closure;

Answer:

Not applicable.

- restructuring costs;

Answer:

Not applicable.

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

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

[Confidential*]

[The above information is related to accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- effects of inflation on financial statement information.

Answer:

Not applicable.

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

Answer:

The Company's accounting methods have not changed in last two years.

A-5 Income statement

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

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

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

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

Answer:

Please refer to Table A-5 [Confidential*] for income statement of CPSS.

[The above confidential information is related to income statement of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided in an index form.]*

A-6 Sales

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

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

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

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

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

Answer:

Please refer to Table A-6 [Confidential*] for turnover of CPSS.

[The above confidential information is related to sales revenue of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided in an index form.]*



SECTION B - SALES TO AUSTRALIA (EXPORT PRICE)

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

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

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

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

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

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

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

Answer:

Please refer to **Exhibit B-1** [Confidential*] for customers' information.

[The above confidential information is related to customers' information of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

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

Answer:

During the period of investigation (POI), the goods were sent from China to Australia directly.

Please refer to **Exhibit B-2** [Confidential*] for distribution chart of exports to Australia.

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[The above confidential information is related to sales activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- (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.

Answer:

[Confidential*]

Please refer to **Exhibit B-2** [Confidential*] for distribution chart of exports to Australia.

[The above confidential information and exhibit is related to sales activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

During the POI, [Confidential*] were applied for exports to Australia. [Confidential*]

[The above confidential information is related to sales activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- (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).

Answer:

There are no such agency or distributor agreements.

- (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.

Answer:

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

[Confidential*]

[The above confidential information is related to sales activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- (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).

Answer:

[Confidential*]There is no financial or other arrangement between CPSS and [Confidential*]. The transactions between CPSS and [Confidential*] during the POI were sales based on free negotiation and market conditions.

[The above confidential information is related to sales activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

The Company confirms the price based on the market situation and arranges the production and delivery according to the sales contract.

- 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.

Answer:

No, the sales prices are not different according to the distribution channel.

B-4 Australian sales data

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

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

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

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Column heading	Explanation
Customer name	names of your customers
Level of trade	the level of trade of your customers in Australia
Model	commercial model name
Product code	code used in your records for the model/grade/type identified. Explain the product codes in your submission.
Dimension	Specify ball diameter (mm)
Grade	Specify grade
Cr Alloy content	Specify chromium %
Production Method	Specify if the grinding balls are produced by forging or casting
Invoice number	invoice number
Invoice date	invoice date
Date of sale	Refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale, report that date. For example, order confirmation, contract, or purchase order date.
Order number	if applicable, show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Shipping terms	Delivery terms eg. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	Agreed payment terms eg. 60 days=60 etc
Actual weight	Actual weight (specify units e.g. Tonnes)
Gross invoice value	Gross invoice value shown on invoice <i>in the currency of sale, excluding taxes.</i>
Discounts on the invoice	If applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Rebates or other allowances	The amount of any deferred rebates or allowances paid to the importer in the currency of sale.
Other charges	Any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide a description.
Invoice currency	The currency used on the invoice
Exchange rate	Indicate the exchange rate used to convert the currency of the sale to the currency used in your accounting system
Net invoice value in the currency of the exporting country	The net invoice value expressed in your domestic currency as it is entered in your accounting system
Other discounts	The actual amount of other discounts (e.g. quantity discounts) not deducted from the invoice. Show a separate column for each type of quantity discount.
Ocean freight**	The actual amount of ocean freight incurred on each export shipment listed.
Marine insurance	Amount of marine insurance
FOB export price**	The free on board price at the port of shipment.
Packing method	Method of packaging (in drums, on pallets etc.)
Packing expenses*	Packing expenses
Inland transportation costs*	Inland transportation costs included in the selling price. For export sales this is the inland freight from factory to port in the country of export.
Handling, loading & ancillary expenses*	Handling, loading & ancillary expenses. For example, terminal handling, export inspection, wharfage & other port charges, container tax, document fees & customs brokers fees, clearance fees, bank

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	charges, letter of credit fees, & other ancillary charges incurred in the exporting country.
Warranty & guarantee expenses*	Warranty & guarantee expenses
Technical assistance & other services*	Expenses for after sale services, such as technical assistance
Commission	Commissions paid. If more than one type is paid insert additional columns of data.
Other Costs	Any other costs, charges or expenses incurred in relation to the exports to Australia (include additional columns as required). See question B.5.

** FOB export price and Ocean Freight:

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

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

Freight allocations must be checked for consistency.

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

Answer:

Please refer to Table B-4 [Confidential*] for Australia sales.

[The above confidential information is related to sales information of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

There were no other costs, charges or expenses incurred except those have been reported in Table B-4.

- B-6** For each type of discount, rebate, allowance offered on export sales to Australia:
- provide a description; and
 - explain the terms and conditions that must be met by the importer to obtain the discount.

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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.

Answer:

There is no discount, rebate allowance on export sales to Australia.

- 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.

Answer:

During the POI, the Company did not issue the credit notes on export sales to Australia.

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

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

Answer:

During the POI, the Company did not use such delivery term on export sales to Australia.

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

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

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

Answer:

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Please refer to Exhibit B-9.1/2 [Confidential*] for export sales documents of two shipments.

[The above confidential information is related to sales information of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

SECTION C - EXPORTED GOODS & LIKE GOODS

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

Answer:

During the POI, the subject goods exported to Australia by the Company is ferrous grinding ball being used for comminution of metalliferous ores.

Please refer to Exhibit A-3.10 for the product brochure.

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

Answer:

Please see table below for each type of goods exported to Australia during the POI.

STEEL GRADE	Technology Standard	Diameter
[Confidential*]	[Confidential*]	[Confidential*]
[Confidential*]	[Confidential*]	[Confidential*]
[Confidential*]	[Confidential*]	[Confidential*]
[Confidential*]	[Confidential*]	[Confidential*]

[The above confidential information is related to specific product exported to Australia by CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

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

EXPORTED TYPE	DOMESTIC TYPE	IDENTICAL?	DIFFERENCES
Product code of each model of the goods	Product code of comparable model	If goods are identical	Where the good exported to Australia is

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exported to Australia	sold on the domestic market of the country of export	indicate "YES".Other wise "NO"	not identical to the like goods, describe the specification differences.If it is impractical to detail specification differences in this table refer to documents which outline differences
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Answer:

Please refer to **Table C-3** [Confidential*] for requisite information.

[The above confidential information is related to specific products sold in domestic market and Australia, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

During the POI, the subject goods sold on domestic market by the Company is ferrous grinding ball being used for comminution of metalliferous ores. Please refer to **Exhibit A-3.10** for product brochure.

SECTION D - DOMESTIC SALES

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

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

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

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

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

D-1 Provide:

- a detailed description of your distribution channels to domestic customers, including a diagram if appropriate;
 - information concerning the functions/activities performed by each party in the distribution chain; and
 - a copy of any agency or distributor agreements, or contracts entered into.
- If any of the customers listed are associated with your business, provide details of that association. Describe the effect, if any, that association has upon the price.

Answer:

There are two distribution channels i.e. sale to distributors and sale to end users; please refer to Exhibit D-1.1 [Confidential*] for chart of distribution channel to domestic customers.

[Confidential*]

Please refer to the sales documents attached as Exhibit D-7.1/2 [Confidential*] for a copy of the sales contracts and VAT invoices.

[Confidential*]

[The above confidential information is related to sales activities of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the*

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information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]

- 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.

Answer:

There is no difference between different distribution channel and trade levels.

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

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

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

Answer:

[Confidential*]

[The above confidential information is related to sales activities of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

D-4 Domestic sales data

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

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

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

Answer:

Please refer to Table D-4 [Confidential*] for domestic sales.

[The above confidential information is related to domestic sales of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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Columnheading	Explanation
Customer name	names of your customers.If an English version of the name is not easily produced from your automated systems show a customer code number and in a separate table list each code and name.
Level of trade	the level of trade of your domestic customer
Model	commercial model name
Dimension	Specify ball diameter (mm)
Product code	code used in your records for the model/grade/type of the goods identified.Explain the product codes in your submission.
Cr Alloy content	Specify chromium %
Production method	Specify if the grinding balls are produced by forging or casting
Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this section.If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale and should be used, report that date.For example, order confirmation, contract, or purchase order date.
Order number	show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Delivery terms	egex factory, free on truck, delivered into store
Payment terms	payment terms agreed with the customer eg. 60 days=60 etc
Quantity	quantity in units shown on the invoice eg kg.
Gross Invoice value	gross value shown on invoice <i>in the currency of sale</i> , net of taxes.
Discounts on the Invoice	the amount of any discount deducted on the invoice on each transaction.If a % discount applies show that % discount applying in another column.
Other charges	any other charges, or price reductions, that affect the net invoice value.Insert additional columns and provide description.
Net invoice value in the currency of the exporting country	the net invoice value expressed in your domestic currency as recorded in your accounting system
Rebates or other Allowances	the actual amount of any deferred rebates or allowances in the currency of sale
Quantity discounts	the actual amount of quantity discounts not deducted from the invoice.Show a separate column for each type of quantity discount.
Packing method	Method of packaging (in drums, on pallets etc)
Packing expense*	packing expenses
Inland transportation Costs*	amount of inland transportation costs included in the selling price.
Handling, loading And ancillary Expenses*	handling, loading & ancillary expenses.
Warranty & Guarantee expenses*	warranty & guarantee expenses
Technical assistance & other services*	expenses for after sale services such as technical assistance
Commissions*	commissions paid.If more than one type is paid insert additional columns of data.
Other factors*	any other costs, charges or expenses incurred in relation to the domestic sales (include additional columns as required).See question D5.

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

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.

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Answer:

Please refer to **Table D-4** [Confidential*] for domestic sales.

[The above confidential information is related to domestic sales of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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.

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

Answer:

Not applicable..

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

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

Answer:

Please refer to **Exhibit D-7.1/2** [Confidential*] for copies of documents of two domestic sales during the POI.

[The above confidential information is related to domestic sales of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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.

Answer:

Inland freight

[Confidential*]

Please refer to **Exhibit E-1.1.1** [Confidential*] for inland transportation contract.

Ocean freight

[Confidential*]

Please refer to **Exhibit E-1.1.2** [Confidential*] for ocean freight and ocean insurance documents.

The general ledger for both inland freight and ocean freight is "selling expenses".

[The above confidential information is related to sales expense of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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;

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

- document fees and customs brokers fees;
- clearance fees;
- bank charges, letter of credit fees
- other ancillary charges.

Answer:

[Confidential*]

The general ledger for handling expense is “selling expenses” .

[The above confidential information is related to sales expense of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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.

Answer:

[Confidential*]

[The above confidential information is related to credit cost of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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**'.

Answer:

This question is not applicable since there is no difference of package between domestic and export sales.

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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.

Answer:

[Confidential*]

[The above confidential information is related to commissions of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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.

Answer:

This question is not applicable since not such services are provided.

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.

Answer:

This question is not applicable.

8. Currency conversions

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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.

Answer:

This question is not applicable.

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

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

Answer:

Not applicable.

2. Import charges and indirect taxes

If exports to Australia:

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

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

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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 goods sold *domestically* but is not borne by the exports to Australia;

Substitution drawback systems

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

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

Answer:

Not applicable.

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.

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

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

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

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

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

This requires the following information:

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

or

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

Answer:

Not applicable.

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 system¹, the average credit period may be determined as follows:

1. Calculate an accounts receivable turnover ratio

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

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

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

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

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.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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:

Answer:

[Confidential*]

[The above confidential information is related to credit cost of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

5. **Transportation**

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

Answer:

[Confidential*]

[The above confidential information is related to transportation expense of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

6. **Handling, loading and ancillary expenses**

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

Answer:

This question is not applicable, since all handling or loading expenses are borne by the customers.

7. **Packing**

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

Not applicable.

8. Commissions

For any commissions paid in relation to the domestic sales:

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

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

Answer:

[Confidential*]

[The above confidential information is related to commissions of CPSS in domestic market, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

9. Warranties, guarantees, and after sales services

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

Answer:

Not applicable.

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:

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

Not applicable.

E-3 Duplication

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

For example:

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

Separate adjustment items must avoid duplication.

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

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

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

F-1 Third country sales data

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

This data should be provided on a summary basis.

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

Column heading	Explanation
Country	Name of the country that you exported like goods to over the investigation period.
Number of customers	The number of different customers that your company has sold like goods to in the third country over the investigation period.
Level of trade	The level of trade that you export like goods to in the third country.
Quantity	Indicate quantity, in units, exported to the third country over the investigation period.
Unit of quantity	Show unit of quantity 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.

Answer:

Please refer to **Table F-1 [Confidential*]** for third country sales.

[The above confidential information is related to third country sales of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

There are no material differences in sales to third countries and export sales to Australia.

SECTION G - COSTING INFORMATION AND CONSTRUCTED VALUE

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

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

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

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

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

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

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

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

G-1. Production process and capacity

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

Answer:

The production involves the following steps: heating, rolling, quenching, tempering, inspection and packaging. Please see Exhibit G-1.1 for the production flowchart. The only product produced by using the production facilities is grinding ball. Except steel scrap, there is no by-product result from the production.

G-2. Production capacity data

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

Answer:

Please see the Table G-2 [Confidential*] for “Production”.

[The above confidential information is related to production capacity and production quantity of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

G-3. Cost accounting practices

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

Answer:

[Confidential*]

[The above confidential information is related to cost accounting practices of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- 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 goods - and describe how those variances have been allocated.

Answer:

The Company does not apply standard cost, so this question is not applicable.

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

Answer:

The Company does not apply standard cost, so this question is not applicable.

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

[Confidential*]

[The above confidential information is related to cost centre of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above confidential information is related to cost centre of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above confidential information is related to cost accounting practices of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

There is no such kind of difference.

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

Answer:

The Company did not engage in start-up operations, so this question is not applicable.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

The Company did not engage in start-up operations, so this question is not applicable.

G-4 Cost to make and sell on domestic market

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

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

- **Answer:**

Please see attached **Table G-4** [Confidential*] for "Domestic CTMS".

[The above confidential information is related to cost of manufacture data of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- Please provide the actual unit cost to make and sell **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.

- **Answer:**

The "Domestic CTMS" is prepared for each model.

- Provide this cost data for each quarter over the investigation period. If your company calculates costs monthly, provide monthly costs.

- **Answer:**

The "Domestic CTMS" is prepared monthly.

- Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.

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

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(identify which version – see ‘BACKGROUND AND GENERAL INSTRUCTIONS’)

- **Answer:**

Please see attached for the **Exhibit G-4.1** [Confidential*] for the “Monthly Cost Calculation” and **Exhibit G-4.2** [Confidential*] for the Details of SGA.

[The above confidential information is related to cost of manufacture and SG&A data of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.

- **Answer:**

[Confidential*]

[The above confidential information is related to cost accounting practice of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

- **Answer:**

The Company provides the cost information in a similar format with “Domestic CTMS”

- Please specify unit of currency.

- **Answer:**

The currency unit is RMB Yuan.

- 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.

- **Answer:**

There is no such difference.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

- 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.

- **Answer:**

There is no such difference.

- Supply your Bill of Materials **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.

- **Answer:**

[Confidential*]

[The above confidential information is related to production process of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

FOR PUBLIC RECORD

(identify which version – see ‘BACKGROUND AND GENERAL INSTRUCTIONS’)

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

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

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

- **Answer:**

Please see attached Table G-5 [Confidential*] for “Australian CTMS”.

[The above confidential information is related to cost of manufacture data of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- Please provide the actual unit cost to make and sell **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.

- **Answer:**

The “Australia CTMS” is prepared for each model.

- Provide this cost data for each quarter over the investigation period. If your company calculates costs monthly, provide monthly costs.

- **Answer:**

The “Australia CTMS” is prepared monthly.

- Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.

- **Answer:**

Please see attached for the **Exhibit G-4.1** [Confidential*] for the “Monthly Cost Calculation” and **Exhibit G-4.2** [Confidential*] for the Details of SGA.

[The above confidential information is related to cost and SG&A data of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

- Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.

- **Answer:**

The Company does not account the cost by breaking down into fixed and variable costs.

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

- **Answer:**

The Company provides the cost information in a similar format with “Domestic CTMS”

- Please specify unit of currency.

- **Answer:**

The currency unit is RMB Yuan.

- 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.

- **Answer:**

There is no such difference.

- 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.

- **Answer:**

There is no such difference.

- Supply your Bill of Materials **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.

- **Answer:**

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

[Confidential*]

[The above confidential information is related to production process of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

G-6 Major raw material costs

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

For these major inputs:

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

[Confidential*]

[The above confidential information is related to raw materials of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

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

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

SECTION H – PARTICULAR MARKET SITUATION

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

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

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

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

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

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

There are three parts to this section:

- PART H-1 - Requests information concerning the organisation of your company and the Government of China's involvement in the business of your company.
- PART H-2 - Requests information concerning the Government of China's measures with respect to the steel industry in China.
- PART H-3 - Requests information concerning the grinding balls sector in the region where your company is located.

PART H-1 GENERAL INFORMATION

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

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

- a) reporting requirements;

Answer:

The Company has the obligation to file the financial statements to the taxation authorities so that the authorities could calculate and review the amount of taxes that should be levied on THE COMPANY.

- b) payment of taxes;

Answer:

The Company has the obligation to pay income tax, value added tax and all other taxes to the taxation authorities.

- c) senior management representation within your business;

Answer:

[Confidential*]

[The above confidential information is related to senior management of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- d) supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC.

Answer:

The Company is not under the supervision of SASAC.

- e) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions);

Answer:

The Company makes its own business decisions and there is no government department/office involved.

- f) licensing;

Answer:

The only license that the Company needs to obtain is Business license.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

g) restrictions on land use;

Answer:

[Confidential*]

[The above confidential information is related to land of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

h) provision of loans; or

Answer:

[Confidential*]

[The above confidential information is related to loan of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

i) provision of grants, awards or other funds.

Answer:

[Confidential*]

[The above confidential information is related to grants of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

2. Business structure, ownership and management

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

Answer:

[Confidential*]

[The above confidential information is related to ownership of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

[Confidential*]

[The above confidential information is related to board of directors of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

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

Answer:

No member is representative, employee or otherwise affiliated with the GOC.

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

Answer:

[Confidential*]

[The above confidential information is related to board of directors of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

No member of the Company is appointed or recommended by the GOC.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

- f) Indicate who owns what percentage of all shares in your business and identify whether they are:
- an affiliate, representative, agency or otherwise representative of the Government of China;
 - employees of your business;
 - foreign investors; or
 - other (please specify).

Answer:

[Confidential*]

[The above confidential information is related to shareholders of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

There's no significant change in the ownership structure of the Company during the POI.

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

Answer:

No management position is appointment or designated to act on behalf of government authorities.

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

Answer:

To the best of the Company's knowledge there is no such requirement in law or in practice.

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

The Company is not a publicly-traded company, thus this question is not applicable.

- k) Provide the monthly trading volume and average monthly trading price of your listed security between 1 July 2014 and 30 June 2015.

Answer:

The Company is not a publicly-traded company, thus this question is not applicable.

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

Answer:

The Board of Directors has the right to reward, fire or discipline the senior managers.

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

Answer:

No, there is no manager from the Company holding positions in any GOC departments or organisations, associations or Chambers of Commerce.

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

Answer:

The Company has no pricing committee.

3. Licensing

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

Answer:

Please refer to Exhibit H-1-3.a for the Chinese and English versions of the business license of the Company.

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

The Administration for Industry and Commerce in Jiangyin is responsible for issuing Business Licences.

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

Answer:

In general, the procedure to apply for a license is to submit an application with materials set forth below:

**A letter of application issued by the legal representative;
Certificate of a representative of shareholders or an agent jointly appointed by shareholders;
A copy of Articles of Association;
Certificate for place of operation;
Certificate of property;
Identity of legal representative;
Certificate of investment verification;
Letter of appointment of the members of the Board and managers, their names, identity, residence, name of the company.**

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

Answer:

There's no special requirement or condition that must be met in order to obtain the licence.

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

Answer:

There's no special requirement or condition that must be met in order to obtain the licence.

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

Answer:

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

In case a company wishes to expand the scope of its business, the company simply notifies the Administration for Industry and Commerce located at the place where the company is registered. If a company expands the scope of its business without notifying the local administration for industry and commerce, the administration will stop it according to the law and confiscate the illegal income. If the behaviour of the company violates the criminal law, the company shall be investigated for criminal responsibility according to law.

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

Answer:

As can be seen from the copy of the Business License submitted, the Company has the right to deal with production and sale of a range of production and sales of steel products, including grinding balls.

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

Answer:

If a company is involved in illegal activities, or goes bankrupt or it engages in fraudulent business practices or forges documents or alters the Business License or transfers, lends or rents the Business License, etc., the Business License can be revoked by the Administration for Industry and Commerce.

4. Decision-making, planning and reporting

- a) Provide a description of your business' decision-making structure in general and in respect of steel products. This should identify the persons or bodies primarily responsible for deciding:

- (i) what goods are produced;
- (ii) how the goods are produced;
- (iii) how levels of inputs such as raw materials, labour and energy are set and secured;
- (iv) how the use of your outputs, such as how your product mix is determined; and
- (v) how your business' profit is distributed, etc., is determined.

Answer:

[Confidential*]

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

[The above confidential information is related to decision-making of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

There is no government involvement in the decision-making process respecting the manufacture, marketing and sale of the product concerned.

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

Answer:

No government department/office is involved, either directly or indirectly, in the manufacture, sale or purchase of steel products.

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

Answer:

The Company needs to submit the enterprise VAT return, enterprise income tax return and VAT refund return to relevant tax authorities.

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

Answer:

The Company does not have copies of any Provincial/City Five Year Plans.

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

The Company has no Five Year Plans.

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

Answer:

Please Exhibit H-1-4.g [Confidential*] for the minutes of your Board of Directors and Board of Shareholders meetings over the investigation period.

[The above confidential information is related to minutes of Board of Directors of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above confidential information is related to decision making of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

5. Financial and investment activities

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

Answer:

[Confidential*]

[The above confidential information is related to loan of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

The average loan interest rates over the last years, i.e. 2011-2015, are [Confidential*]

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

[The above confidential information is related to loan of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above confidential information is related to loan of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- d) Has your business raised any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments in the last 5 years? If so:
- i. explain what instruments were used;
 - ii. identify the type (e.g government guarantee) and provider of the security; and
 - iii. explain the reasons for raising the capital.

Answer:

[Confidential*]

[The above confidential information is related to capital of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

There is no such policy.

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

Answer:

There is no such investment.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

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

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

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

Answer:

The Company has no knowledge regarding the above mentioned documents concerning the steel industry/sector.

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

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

- industrial policy and guidance on the steel industry sector;
- market entry criteria for the steel industry sector;
- environmental enforcement for the steel industry sector;
- management of land utilization;
- the China Banking Regulatory Commission for the steel industry sector;
- investigation and inspection of new steel expansion facilities;
- the section in the National Development and Reform Commission that is responsible for the steel industry sector; and
- import licensing for iron ore, steel and other steel raw materials.

Answer:

The Company has no knowledge of these government measures concerning the steel industry.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

3. National Steel Policy

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

Answer:

The Company has no knowledge of the national steel policy. Thus, the question below is not applicable.

- a) Explain in detail how the policy and any updates regarding the policy were communicated to your company.
- b) Identify the government department, association, or company official that communicated this policy or any related measures, to your company as well as the government office or association and the names of the officials who are responsible for the administration of this policy.
- c) Explain in detail the information that has been provided to you from official and unofficial channels concerning action to be taken by your company in relation to the policy.
- d) Do you have designated officials that have provided direction to your company regarding the Government of China's measures and how to proceed with your current project or future plans within the scope of the policy?
- e) Explain in detail if there are additional directives or measures from the Government of China that have been communicated to your company, since the inception of the policy.
- f) Explain in detail whether the policy has ever impacted your company's investment plans. This may include reference to specific measures considered or taken by your company to address issues and/or objectives raised by the policy. Such items may include but are not limited to items such as project approval process, credit and loans (including discounted interest payments), the environment, the scale of production, energy use, raw material inputs etc.
- g) Explain the ongoing mechanism used by the Government of China to measure your company's compliance with the policy directives and/or guidelines.
- h) The policy includes directives and/or guidelines that permit authorities to limit the supply of water, power, land and bank loans etc. to steel producers, which do not meet the objectives of the policy.

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

- Explain in detail whether your company's expansion or investment plans have ever been or may be impacted by these criteria.
 - Explain the procedure to be followed by a steel company in making a request for approval of a steel investment for an existing steel enterprise or new steel enterprise.
 - Identify any Government of China bodies at the regional or provincial level that have the responsibility to grant the approval, or refuse approval regarding an investment in the steel sector.
 - Are review and approval decisions regarding investments in the steel sector made by the central government or are they delegated to the regional or provincial level?
- i) Describe the role of the National Development and Reform Commission in terms of communicating, implementing and overseeing policies governing the steel sector, including but not limited to, China's National Steel Policy.

4. Other government approvals

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

Answer:

The Company has no knowledge of other government approvals. Thus, the question below is not applicable.

- a) Explain whether your company has undertaken an approval process through the Government of China for any steel investments in the last 10 years.
- b) Explain whether any applicable investments received the necessary approval and if so, provide documentation confirming this approval.
- c) If your investment was not approved, provide the reasons given for the refusal.
- d) Describe the process your company has to follow to obtain these approvals.
- e) Provide a translated copy of the application form along with the original Chinese version.

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

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

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

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

Answer:

There wasn't any directive or measures from the GOC that have been communicated to the Company.

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

Answer:

There wasn't any directives or measures from the GOC that have been communicated to the Company, thus this question is not applicable.

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

Answer:

There wasn't any directives or measures from the GOC that have been communicated to the Company, thus this question is not applicable.

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

Answer:

There wasn't any directives or measures from the GOC that have been communicated to the Company, thus this question is not applicable.

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

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

There wasn't any directives or measures from the GOC that have been communicated to the Company, thus this question is not applicable.

PART H-3 THE GRINDING BALLS SECTOR

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

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

1. Export quotas and licensing

Answer:

There was and is no export quota and licensing applied to grinding balls. Thus the questions below are not applicable.

a) Are grinding balls sold by your company subject to any export quotas?

If so, explain why grinding balls are subject to quotas and the method by which the quotas are allocated.

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

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

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

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

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

2. Taxation

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

Answer:

There was no export tax on exports of grinding balls during the investigation period.

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

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

The VAT rebate applicable to products under investigation was 5% during the investigation period.

- c) Have there been any changes to the value-added tax rebate applicable to steel exports in the last 5 years? If yes, provide:
- i. a detailed chronological history of the value-added tax rebate rates;
 - ii. products affected;
 - iii. the effective dates of the rate changes;
 - iv. fully translated copies of any Government of China notices regarding these changes, including the relevant appendices.

Answer:

There was no change of the VAT rebate applicable to product under investigation in the last 5 years.

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

Answer:

The Company starts production from steel billets, thus it has no knowledge of the information requested.

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

Answer:

The Company has no such knowledge.

3. Sales terms

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

Answer:

[Confidential*]

[* The above confidential information is related to decision making of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

[Confidential*]

[The above confidential information is related to decision making concerning selling price of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

[The above confidential information is related to operating activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- d) Explain whether your business provides grinding balls price information/data to the Government of China, the China Iron and Steel Association (CISA), other government officials or commercial/industry organisations, including those outside of China, which report on the steel sector.

Answer:

[Confidential*]

[The above confidential information is related to operating activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

[Confidential*]

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

[The above confidential information is related to operating activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

4. Industry associations

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

Answer:

No, The Company is not a member of any industry association.

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

Answer:

The Company is not a member of any industry association. Thus this question is not applicable.

5. Other industry associations

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

Answer:

No, The Company is not a member of any industry association.

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

Answer:

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

The Company is not a member of any industry association. Thus this question is not applicable.

6. Statistics submission/recording

Answer:

The Company does not make such submission, thus the questions below are not applicable.

- a) Indicate if your business makes submissions³ to the Chinese Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.
- b) Provide a recent example of a submission that has been made to the Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.
- c) Do the organisations approve or assess your submission? If yes, provide a detailed explanation.
- d) Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.

7. Manufacturing inputs

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

Answer:

The Company negotiates purchase prices of steel billets with each supplier separately. The prices reflect the fluctuation of market situation.

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

Answer:

The Company negotiates purchase prices of steel billets with each supplier separate. The prices reflect the fluctuation of market situation.

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

Answer:

All steel billets were purchased locally, thus this question is not applicable.

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

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

The Company did not benefit from any such concessions, thus this question is not applicable.

8. Regional differences

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

Answer:

The Company's production facilities are in one province, thus this question is not applicable.

9. Grinding balls production/output during the investigation period

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

Answer:

The Company is not aware of any such guidance.

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

Answer:

There are no such policies or guidelines.

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

Answer:

There are no such policies or guidelines.

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

There are no such restrictions.

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

Answer:

Please refer to Section D of this question reply, which contains detailed information of domestic customers.

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

Answer:

There are no such restrictions.

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

Answer:

There are no such requirements.

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

Answer:

There was no such restriction.

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

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

There was no such restriction.

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

Answer:

There was no such change over the last 5 years.

10. Sales price during the investigation period

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

Answer:

There was no such price guidance or controls by the GOC during the investigation period.

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

Answer:

There was no such price guidance or controls by the GOC during the investigation period.

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

Answer:

There was no such price guidance or controls by the GOC during the investigation period.

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

Answer:

The selling price is determined based on market situation. There were no any restrictions, limitations, or other considerations imposed.

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

There is no such price leader.

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

Answer:

The Company has no pricing committee.

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

Answer:

The Company has no pricing committee.

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

Answer:

The general manager and the managers of sales departments are responsible for the final decision on the sales terms, prices and other contract provisions for the sales of the goods.

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

Answer:

The Company has production facilities at only one province.

11. Adding capacity and/or joint ventures

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

Answer:

The Company is not aware of such approval process.

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

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

The Company is not aware of such approval process.

12. Steel billet or grinding bar (Purchased)

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

- a) Provide a detailed listing of your steel billet (or grinding bar) purchases by completing the 'Steel Billet/Grinding Bar Purchases' tab of the attached spreadsheet.

Answer:

Please see attached spreadsheet 'Steel Billet/Grinding Bar Purchases'.

- b) Do you have more than one supplier of steel billet or grinding bar? If so, provide an explanation of the reasons of price differences between these suppliers?

Answer:

[Confidential*]

[* The above confidential information is related to supplying of steel billet of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]

- c) Describe in detail your business' purchase procedures of steel billet (or grinding bar) and the considerations in selecting a supplier. If it is by tenders, provide details of the criteria/conditions.

Answer:

[Confidential*]

[* The above confidential information is related to supplying of steel billet of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]

- d) If steel billet or grinding bar is imported by your business, or related businesses:
- i. Provide details including a description of the steel billet or grinding bar imported, the chromium range (%), the supplier and country of origin.
 - ii. Explain the process required to steel billet (e.g. obtaining an

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

- import licence, import declarations).
- iii. Provide details of any conditions to importing the steel billet or grinding bar (e.g. customs and/or quarantine).
- iv. Is your business eligible for a duty drawback? If so, provide details.

Answer:

This question is not applicable since the Company did not import steel billets.

- e) Do you have more than one supplier of the raw materials? If so, provide an explanation of the reasons of price differences between these suppliers?

Answer:

[Confidential*]

[The above confidential information is related to supplying of steel billet of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- f) Describe in detail your business' purchase procedures of the raw materials and the considerations in selecting a supplier. If it is by tenders, provide details of the criteria/conditions.

Answer:

[Confidential*]

[The above confidential information is related to supplying of steel billet of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- g) If any of your raw materials for the production of billet, grinding bar or grinding balls are imported by your business, or related businesses:
 - i. Provide details including a description of the raw material imported, the supplier and country of origin.
 - ii. Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
 - iii. Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
 - v. Are you eligible for a duty drawback? If so, provide details.

Answer:

This question is not applicable since the Company did not import other materials.

13. Steel billet (Sales)

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

[Confidential*]

[The above confidential information is related to operating activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

14. Raw material purchases

Answer:

[Confidential*]

[The above confidential information is related to operating activities of CPSS, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

SECTION I - COUNTERVAILING (SUBSIDISATION)

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

INVESTIGATED PROGRAMS

The following are programs that the Commission is currently investigating:

Program Number	Program Name	Program Type
1	Raw Materials (Steel billet) Provided by the Government at Less than Fair Market Value	Provision of goods
2	Raw Materials (Electricity) Provided by the Government at Less than Fair Market Value	Provision of goods
3	Preferential Tax Policies in the Western Regions	Income Tax
4	Land Use Tax deduction	Income Tax
5	Preferential Tax Policies for High and New Technology Enterprises	Income Tax
6	Tariff and VAT Exemptions on Imported Materials and Equipment	Tariff & VAT
7	One-Time Awards to Enterprises Whose Products Qualify for "Well-Known TradeMarks of China" and "Famous Brands of China"	Grant
8	Matching Funds for International Market	Grant

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(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Program Number	Program Name	Program Type
	Development for Small and Medium Enterprises	
9	Superstar Enterprise Grant	Grant
10	Research & Development ("R&D") Grant	Grant
11	Innovative Experimental Enterprise Grant	Grant
12	Special Support Fund for Non-State Owned Enterprises	Grant
13	Venture Investment Fund of Hi-Tech Industry	Grant
14	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment	Grant
15	Grant for key enterprises in equipment manufacturing industry of Zhongshan	Grant
16	Water Conservancy Fund Deduction	Grant
17	Anti-Dumping Respondent assistance	Grant
18	Technology Project assistance	Grant
19	Capital Injections	Grant
20	Environmental Protection Grant	Grant
21	High and New Technology Grant	Grant
22	Independent Innovation and High-Tech Industrialisation Program	Grant
23	Environmental Prize	Grant
24	Provincial emerging industry and key industry development special fund	Grant
25	Environmental Protection Fund	Grant
26	Intellectual Property licensing	Grant
27	Financial resources construction special fund	Grant
28	Reducing pollution discharging and environmental improvement assessment award	Grant
29	Comprehensive utilisation of resources – VAT refund upon collection	Tariff & VAT
30	Grant of elimination of out dated capacity	Grant
31	Grant from Technology Bureau	Grant

Please answer the questions within parts I-1 to I-4 in relation to these programs.

PART I-1 PREFERENTIAL INCOME TAX PROGRAMS

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

1. Did your business or any company/entity related to your business receive any benefit⁴ under the following income tax programs identified above during the investigation period (1 October 2014 to 30 September 2015).

Program 3: Preferential Tax Policies in the Western Regions

Program 4: Land Use Tax Deduction

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

Answer:

CPSS did not receive any benefits under the Programs listed above other than Program 5 during the POI.

2. It is our understanding that the general tax rate for enterprises in China from 1 July 2010 was 25%. Confirm whether this is correct and if not, please identify the general tax rate for enterprises in China from 1 July 2010, indicating any changes in the taxation rate over the period July 2010 – October 2015.

Answer:

Yes, the general tax rate for enterprises in China during the POI was 25%. There is no change in the taxation rate over the period since July 1, 2010.

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

Answer:

The income tax rate applied to CPSS was 15% during the POI, which was a reduced rate under the qualification as a high and new technology enterprise (i.e. Program 5) subject to Article 28 of the Law of the People's Republic of China on Enterprise Income Tax.

Article 28 provides that "With respect to a high and new technology enterprise that needs key support by the State, the tax levied on its income shall be reduced at a rate of 15 per cent."

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

Not applicable.

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

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

5. Provide complete details of the amount of the benefit received, including whether it was received in total or in instalments.

Answer:

The operation mode of this program is as follows, CPSS prepays the income tax quarterly based on the tax rate of 15% in each quarter, and make final settled payments at the end of each year.

For detailed information of the amount of the benefits received by CPSS during the period, please refer to the below table showing the income tax paid by the company in 2014. Please also refer to **Exhibit I-1.18-a** [Confidential*] for the income tax declaration forms for supporting evidence.

As for the income tax paid by 2015, due to the final settlement which is due at the end of the year has not yet been realized, the company cannot provides the actual amount of income tax paid in 2015.

Year	Income tax actually paid (final settlement)	Reduced income tax amount	Average amount of income tax paid per each quarter
2014	[Confidential*]	[Confidential*]	[Confidential*]

[The above confidential information and exhibit is related to CPSS's paid income tax, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

6. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production, or only certain products that have undergone research and development).

Answer:

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

There was no specific good that benefited from the program. The program benefited all production of the company.

7. Describe the application and approval procedures for obtaining a benefit under the program.

Answer:

Once the enterprise is recognized as a high and new technology enterprise, it can obtain a preferential income tax rate automatically.

The application and approval procedures for the recognition of high and new technology enterprises are as follows:

- a) The enterprise makes an application,**
- b) The enterprise submits materials that related to the application,**
- c) The related authority examines and verifies the materials submitted by the enterprise,**
- d) The authority makes an acknowledgement and determination. Once approved, the enterprise will receive a certificate of high and new technology enterprise from the authority.**

8. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.

Answer:

Please refer to Exhibit I-1.18-a [Confidential*] for the income tax declaration forms as well as the final settlement forms at the end of each year, there is no contractual agreements entered between the company and government of China.

[The above exhibit is related to CPSS's paid income tax, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

9. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

Answer:

There's no fee charged or expense incurred for the purposes of receiving the program.

10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.

Answer:

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

The enterprises that need key support from the State shall have core independent intellectual property rights and meet the following requirements:

- (a) Their products (services) are included in the scope as provided in the Hi-tech Fields with Key State Support;
- (b) The total expenses for research and development shall account for a certain proportion of the total sales income;
- (c) The income from high and new technology products shall account for certain proportion of the total sales income;
- (d) The personnel engaged in research and development shall account for a certain proportion of the total staff;
- (e) Other requirements set by the *Administrative Measures for Certification of New and High Technology Enterprises (Guo Ke Fa Huo[2008] No.172)*

11. State whether your eligibility for the program was conditional on one or more of the following criteria:

- a) whether or not your business exports or has increased its exports;
- b) the use of domestic rather than imported inputs;
- c) the industry to which your business belongs; or
- d) the region in which your business is located.

Answer:

The above criteria are not applicable.

12. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.

Answer:

The benefit was not provided in relation to any specific activity or project of CPSS.

13. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.

Answer:

CPSS keeps the record form of the enterprise income tax reduction for this program, please refer to Exhibit I-1.18-a [Confidential*] for the income tax declaration forms as well as the final settlement forms.

[The above confidential information and exhibit is related to CPSS's paid income tax, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

Because the company paid the income tax based on a reduced rate directly, thus benefits under this program cannot be found in the accounting system or financial statements.

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

Answer:

The program is still in force.

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

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

Answer:

The program is still in force, thus this question is not applicable.

17. For each taxation year from 2012 to 2015, complete the "Income Tax" spreadsheet in the ***Exporter Questionnaire spreadsheets – grinding balls*** workbook.

Answer:

Please refer to Table I-1.17 [Confidential*] for the information provided in spreadsheet named "Income Tax".

[* The above confidential information is related to CPSS's paid income tax, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided in an index form.]

18. Provide a copy, bearing the official stamp of the appropriate level of the Government of China of all
- corporate income tax acknowledgement form(s) and the income tax return(s) that your company filed for the 2012, 2013, 2014 and 2015 tax years; and
 - income tax instalment payment receipts, and all applicable income tax forms and schedules for the 2012, 2013, 2014 and 2015 tax years.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

Please refer to Exhibit I-1.18-a [Confidential*] for the income tax declaration forms filed for 2012-2015 as well as the final settlement forms in 2012-2014, and Exhibit I-1.18-b [Confidential*] for income tax instalment payment receipts.

[The above confidential exhibits are related to CPSS's paid income tax, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

PART I-2 GRANTS

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

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

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

Program 9: Superstar Enterprise Grant

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

Program 11: Innovative Experimental Enterprise Grant

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

Program 13: Venture Investment Fund of Hi-Tech Industry

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

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

Program 16: Water Conservancy Fund Deduction

Program 17: Anti-dumping Respondent Assistance

Program 18: Technology Project Assistance

Program 19: Capital injections

Program 20: Environmental Protection Grant

Program 21: High and New Technology Enterprise Grant

Program 22: Independent Innovation and High-Tech Industrialization Program

Program 23: Environmental Prize

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

Program 25: Environmental protection fund

Program 26: Intellectual property licensing

Program 27: Financial resources construction special fund

Program 28: Reducing pollution discharging and environment improvement assessment award

Program 30: Grant of elimination of out dated capacity

Program 31: Grant from Technology Bureau

Answer:

CPSS did not benefit from any of the program alleged above.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

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

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

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

If your business or any company/entity related to your business received benefits under any such program during the period 1 January 2005 to 30 September 2015, please answer the following questions.

Answer:

The company did not benefit from the programs mentioned above during the period, thus the questions in this section are not applicable.

In particular, none of CPSS's equipment was imported. Please refer to Exhibit I-3 [Confidential*] for the detail list of fixed assets of the company.

[The above confidential exhibit is related to CPSS's fixed assets, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

STEEL BILLET (PROGRAM 1)

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

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

In relation to this program, provide the following information.

1. Did your business or any company/entity related to your business receive any benefit under the above program during the period **1 October 2014 to 30 September 2015**?

Answer:

No, CPSS did not receive any benefit under this program during the period.

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

Answer:

CPSS doesn't purchase steel billet from state-owned enterprises.

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

Answer:

The detailed information of suppliers is provided as Exhibit I-4.3 [Confidential*].

[The above confidential exhibit is related to CPSS's suppliers of steel billet, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Provide this data on a **transaction-by-transaction basis, for all purchases of steel billet and bar** during the period **1 July 2014 to 30 September 2015**. This data should be provided for all purchases, not only those of Chinese origin (i.e. include imported materials as well).

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Answer:

Please refer to **Table I-4.4** [Confidential*] for the purchase price of steel billet provided in the spreadsheet named "Steel billet purchases".

[The above confidential table is related to CPSS's purchases of steel billet, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

CPSS did not receive any reduction/reduced prices for the purchase of goods/services during the period.

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

Answer:

CPSS has no contractual agreements with state-owned enterprises for any assistance/benefits related to the purchase of the goods/services.

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

Answer:

CPSS did purchase imported steel billet or bar, thus this question is not applicable.

ELECTRICITY(PROGRAM 2)

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

Please answer the following questions in relation to your purchases of electricity from **1 October 2014 to 30 September 2015**.

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

Answer:

CPSS didn't receive any benefit under the above programs during the period. CPSS purchases electricity from SOE, but no goods are bought at the price less than the market price in Jiangsu Province.

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

Answer:

Please refer to Exhibit I-4.2.1 [Confidential*] for the list of suppliers of electricity. As for evidence concerning the supplier's identity as a SIE, please refer to Exhibit I-4.2.2 for the business registration information found on the website of State Administration for Industry & Commerce of the P.R.C.

[The above confidential table is related to CPSS's suppliers of electricity, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

No, CPSS didn't receive any reduction to normally available price.

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

Answer:

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Please refer to Table I-4.4.1 [Confidential*] for the spreadsheet “Electricity”. Please see Exhibit I-4.4.2 [Confidential*] for the all payment invoices and evidences of payment during the POI.

[The above confidential table and exhibit are related to CPSS's purchases of electricity, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

Please refer to the contract signed between SIE and the company for purchasing electricity in Exhibit I-4.5. [Confidential*] However the contract does not demonstrate the granting or receipt of any benefits. Please also note even though as shown in the contract that it was signed in 2006 and terminated in March 2011, the contract was renewed automatically and was still in force during the period.

[The above confidential exhibit is related to CPSS's purchases of electricity, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

CPSS has no knowledge of how the GOC set the price for electricity.



PART I-5 ANY OTHER PROGRAMS

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

This may have included:

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

Answer:

CPSS considers that pursuant to Article 11.1 and 11.2, among others, of the ASCM, for a subsidy program to be legally investigated, the complainant shall include sufficient evidence regarding the existence, amount and nature of a subsidy in the written application. This is, however, not the case concerning the submission of the current investigation.

Nevertheless, in order to let the investigation authority have a clear understanding of other grants from which CPSS were benefited during the period, a list of benefits received under these grants in the said period is attached as Exhibit I-5[Confidential*]. Besides, please see answers to questions below for detailed information.

This, however, should in no event be considered that CPSS agrees these other grants listed are actionable, or the authority could legally impose countervailing duty on CPSS in terms of other grants voluntarily reported.

[The above confidential exhibit is related to CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

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

A. Reporting Program: [Confidential*]

[The above confidential information is related to CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

1. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production, or only certain products that have undergone research and development).

Answer:

The program benefited [Confidential*].

[The above confidential information is related to benefited goods concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

2. Describe the application and approval procedures for obtaining a benefit under the program.

Answer:

[Confidential*]

[The above confidential information is related to application and approval procedure concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

3. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.

Answer:

Please refer to **Exhibit I-5.A.3** [Confidential*] for the application form as well as the attachment to the form, i.e. Certificate of High and New Technology Products.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

[The above confidential exhibit is related to application forms concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

4. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

Answer:

There is no fee or expense incurred by the company for the purpose of the program.

5. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.

Answer:

[Confidential*]

[The above confidential information is related to eligibility criteria concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

6. State whether your eligibility for the program was conditional on one or more of the following criteria:
- a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.

Answer:

The above criteria are not applicable.

7. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.

Answer:

The program relates to [Confidential*].

[The above confidential information is related to benefited activities concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

8. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.

Answer:

The company only keeps record of the application forms and attachments therewith as shown in Exhibit I-5.A.3 [Confidential*].

[The above confidential information is related to application forms concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

The benefit can be identified [Confidential*].

[The above confidential information is related to accounting system of CPSS concerning other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

To the company's knowledge, the program is still in operation.

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

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

Answer:

To the company's knowledge, the program is still in operation, thus the questions above are not applicable.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

B. Reporting Program: [Confidential*]

[The above confidential information is related to CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- a. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production, or only certain products that have undergone research and development).

Answer:

The program has benefited all production.

- b. Describe the application and approval procedures for obtaining a benefit under the program.

Answer:

The approval procedure is as follows,

[Confidential*]

[The above confidential information is related to approval procedures concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- c. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.

Answer:

The company does not need to submit any application forms, please refer to **Exhibit I-5.B.12-1** [Confidential*] for [Confidential*].

[The above confidential exhibit and information is related to regulations concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- d. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

Answer:

There are no fees or expenses incurred by the company for the purpose of the program.

- e. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.

Answer:

The grant is provided according to the [Confidential*], the company does not need to meet any other criteria.

[The above confidential information is related to eligibility concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

- f. State whether your eligibility for the program was conditional on one or more of the following criteria:
- a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.

Answer:

As noted above, the criteria are not applicable.

12. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.

Answer:

The program concerns [Confidential*].

Please refer to Exhibit I-5.B.12-1 [Confidential*] for the copies of the [Confidential*], as well as the [Confidential*] in Exhibit I-5.B.12-2. [Confidential*]

[The above confidential exhibits and information are related to specific activity and supporting documentation concerning CPSS's other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

FOR PUBLIC RECORD

(identify which version – see 'BACKGROUND AND GENERAL INSTRUCTIONS')

13. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.

Answer:

The company does not keep records regarding the benefits of the program.

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

Answer:

The benefit can be identified in the [Confidential*].

[The above confidential information is related to accounting system of CPSS concerning other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

Answer:

To the company's knowledge, the program is still in operation. However, due to [Confidential*], the company does not benefit from the program since then.

[The above confidential information is related to operation of CPSS concerning other subsidy programs, which is highly sensitive commercial information. Disclosure of the information would bring the Company damage, thus this information was provided to the Designated Authority in confidence.]*

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

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

Answer:

To the company's knowledge, the program is still in operation, thus the questions above are not applicable.