

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: Giannakopoulos Konstantinos
Position in the company: Commercial Department
Company name: Agricultural Cooperatives Union S.A.
Address: Korinthou 201, Aigio, Greece

Telephone number: 0030 26910 22409
Facsimile number: 0030 26910 22384
Email address of contact person: kostas@pesunion.gr

Name of contact person: Mermigkas Nikolaos
Address: Korinthou 201, Aigio, Greece

Telephone number: 0030 26910 22409
Facsimile number: 0030 26910 22384
Email address of contact person: sales@pesunion.gr

Received
05 September 2013

A-2 Representative of the company for the purpose of assessment

If you wish to appoint a representative to assist the company in this investigation, provide the following details:

We do not wish to use representative

Name:
Address:
Telephone:
Facsimile number:
E-mail address of representative:

Note that in nominating a representative, Customs and Border Protection 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 (e.g. company, partnership, sole trader)? Please provide details of any other business names that your company uses to export and/or sell goods.

Agricultural Cooperatives Union S.A.

A Limited By Shares Company called in Greek Law "Anonymous Etairia", A.E.", is formed according to the provisions of Law 2190/20 as amended and currently in force

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).

S/N	COOPERATIVE	SHARES	PERCENTAGE
1.	AGRICULTURAL COOPERATIVE AGIOS KWNSTANTINOS	4	8%
2.	AGRICULTURAL COOPERATIVE ALSOS	2	4%
3.	AGRICULTURAL COOPERATIVE ANW DIAKOPTO	2	4%
4.	AGRICULTURAL COOPERATIVE ARRAVWNITSA	1	2%
5.	AGRICULTURAL COOPERATIVE ACHLADIAS	1	2%
6.	AGRICULTURAL COOPERATIVE VALIMITIKA	4	8%
7.	AGRICULTURAL COOPERATIVE VERINO	1	2%
8.	AGRICULTURAL COOPERATIVE GRIGORI	1	2%
9.	AGRICULTURAL COOPERATIVE DIMITROPOULO	1	2%
10.	AGRICULTURAL COOPERATIVE KALAMIAS	1	2%
11.	AGRICULTURAL COOPERATIVE KAMARES	1	2%
12.	AGRICULTURAL COOPERATIVE KERINEIA	1	2%
13.	AGRICULTURAL COOPERATIVE KOUMARI	2	4%
14.	AGRICULTURAL COOPERATIVE KOUNINA	7	14%
15.	AGRICULTURAL COOPERATIVE KRATHIO-PORRWVITSA	1	2%
16.	AGRICULTURAL COOPERATIVE KRINI	1	2%

17.	AGRICULTURAL COOPERATIVE LAKKA PATRWN	3	6%
18.	AGRICULTURAL COOPERATIVE LOGGOS	4	8%
19.	AGRICULTURAL COOPERATIVE MAMOUSIA	4	8%
20.	AGRICULTURAL COOPERATIVE MELISSIA	2	4%
21.	AGRICULTURAL COOPERATIVE MYROVRYSI	2	4%
22.	AGRICULTURAL COOPERATIVE PARASKEVI	2	4%
23.	AGRICULTURAL COOPERATIVE RODODAFNI	1	2%
24.	AGRICULTURAL COOPERATIVE SALMENIKO	2	4%
25.	AGRICULTURAL COOPERATIVE SELIANITIKA	1	2%
26.	AGRICULTURAL COOPERATIVE TEMENI	1	2%
	TOTAL SHARES AT AGRICULTURAL COOPERATIVES' UNION	50	100%

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

We are not a subsidiary company

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

No

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

We own the company PANAGRO S.A.

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

No

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

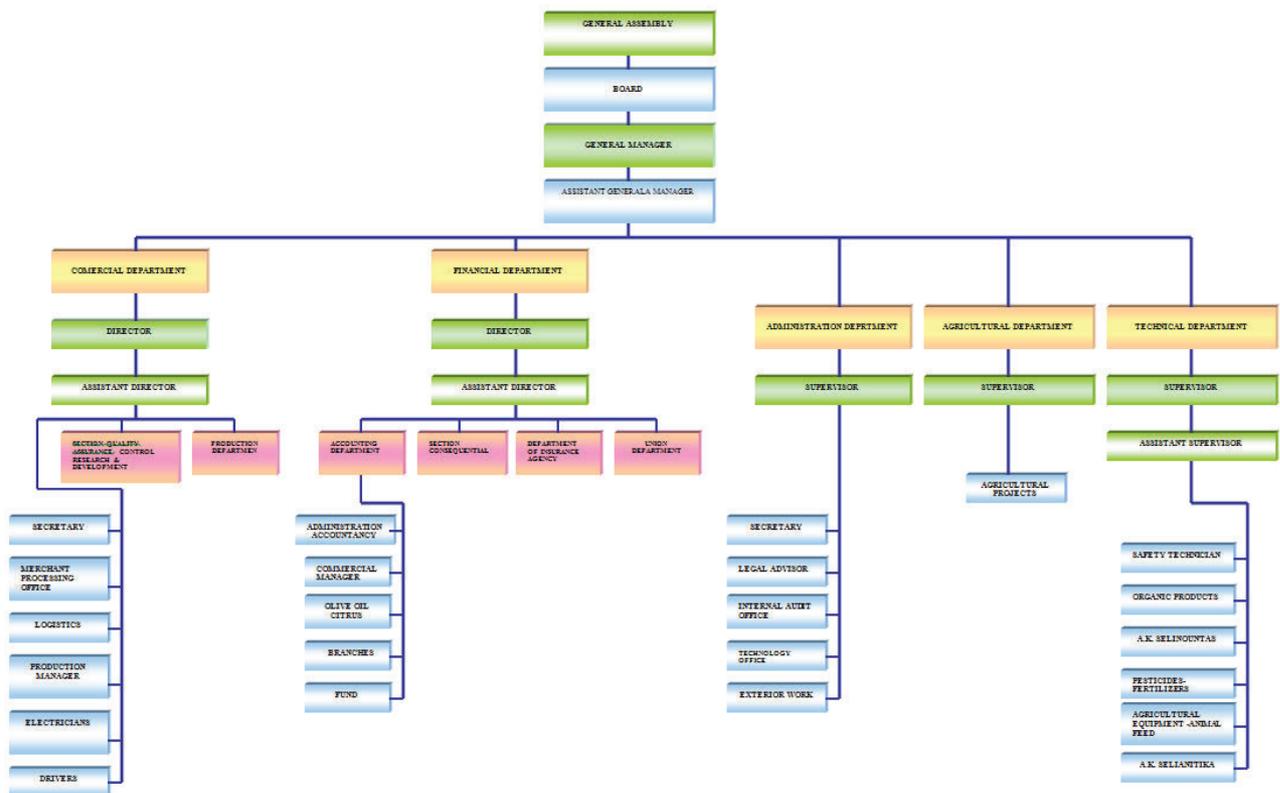
We are a manufacturer that we distribute our products across the globe

8. If your company 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
- sell in the domestic market
- export to Australia, and
- export to countries other than Australia.

If your business does not perform all of these functions, please provide names and addresses of the companies which perform each function.

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



Please find attached the complete file: **company's internal organisation chart.docx**

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

Please find attached with the email, A general pamphlet our company, pamphlets for currants and olive oil and the annual balance sheet of 2012 translated to English

A-4 General accounting/administration information

1. Indicate your accounting period.

Starts 01/01 and ends 31/12

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

Korinthou 201, Aigio, Greece

3. Please provide the following financial documents for your most recently completed financial year 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); and
- 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 investigation.

These documents should relate to:

- the division or section/s of the business responsible for the production and sale of the goods under investigation, and
- the company.
-  [reference to confidential spread sheet]

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

We are audited

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

No they do not differ.

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 (e.g. last in first out –LIFO, first in first out- FIFO, weighted average);


[explanation of valuation method]

- costing methods, including the method (e.g. by tonnes, units, revenue, direct costs etc) of allocating costs shared with other goods or processes (such as front office cost, infrastructure cost etc);
- [redacted] **[explanation of costing methodology applied with respect to allocation of costs shared by the GUC and other goods or processes]**
- valuation methods for damaged or sub-standard goods generated at the various stages of production;
- [redacted] **[explanation of valuation methodology applied in relation to damaged goods]**
- valuation methods for scrap, by products, or joint products;
- [redacted] **[explanation of valuation methodology applied in relation to by-products and scrap]**
- valuation methods for joint products according to the real cost.
- valuation and revaluation methods for fixed assets;
- according to Greek GAAP
- average useful life for each class of production equipment and depreciation method and rate used for each;
- according to Greek GAAP
- treatment of foreign exchange gains and losses arising from transactions;
- [redacted] **[explanation of treatment of foreign exchange gains and losses in accordance with Greek GAAP]**
- treatment of foreign exchange gains/losses arising from the translation of balance sheet items;
- [redacted]
- inclusion of general expenses and/or interest;
 - According to Greek GAAP, Real cost
- provisions for bad or doubtful debts;
 - According to Greek GAAP
- expenses for idle equipment and/or plant shut-downs;
 - According to Greek GAAP, Real cost
- costs of plant closure;
 - According to Greek GAAP, Real cost
- restructuring costs;
 - According to Greek GAAP, Real cost
- by-products resulting from your production process;

- [redacted] [explanation of treatment of by-products]
- effects of inflation on financial statement information.
[redacted] [explanation of relevance for the treatment of inflation for the purposes of Aeghion's financial statement reporting]

In the event that any of the accounting methods used have changed since your most recent financial year provide an explanation of the change, the date of change, and the reason for it.

A-5 Income statement

Please fill in the table – **A-5 Income Statement**. It requires information concerning all products produced and for the goods.

Please explain how costs have been allocated.

The costs have been allocated according real cost

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

Note: if your financial information does not permit presentation of the information in accordance with the table, please present the information in a form that closely matches the table.

A-6 Sales

State your net turnover (after returns and all discounts), and free of duties and taxes. Use the currency in which your accounts are kept.

Net sales [redacted]

Prepare this information in the format shown in the table at **A-6 Turnover**.

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.

SECTION B SALES TO AUSTRALIA (EXPORT PRICE)

This section requests information concerning your company's export practices and prices to Australia. Costs incurred beyond ex-factory should be included. Export prices are usually assessed at FOB point, but Customs and Border Protection may also compare prices at the ex factory level.

*Prices should be reported of **all** of the goods exported by your company to **FRUTEX** during the period of investigation.*

*The invoice date will normally be taken to be the date of sale. If your company considers:
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.*

The invoices are issued during the date of sale

*Your company **must** provide Information in Section D on domestic selling prices for a matching period covering the dates of sale of the exported goods - even if doing so means that such domestic sales data predates the commencement of the investigation period.*

B-1 Please provide the following information in relation to the shipments of the goods to Australia during the period of investigation:

full name of customer: FRUTEX AUSTRALIA PTY LTD.

address: NATIONAL HEADQUARTERS NO. 18ST ALBANS ROAD,
KINGSGROVE, 2208 SYDNEY, AUSTRALIA

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

[REDACTED]

[REDACTED]

[personal details of relevant contact person]

TRADE LEVEL: WHOLESALER

B-2 Please provide also the following information:

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

(a) Goods are shipped to Frutex by sea through Piraeus port in 20" containers [REDACTED]

[confidential information regarding shipping methods]

(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.

(b) Parties:

- Agricultural Cooperatives Union: processing and packing of the goods

[REDACTED]: transportation of goods to the port of Piraeus

[REDACTED]: transportation of goods by sea to Sydney port

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

(c) [REDACTED]

[confidential information regarding sales terms]

(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).

There is no special agreement

(e) Explain in detail the process by which your company negotiates price, receives orders, delivers, invoices and receives payment. If export prices are based on price lists supply copies of those lists.

(e) The price to the growers at the beginning of each season is fixed by [REDACTED]

[REDACTED]

[REDACTED]

[confidential information regarding pricing policies]

We make shipments according to purchase orders we receive from the buyers.

[REDACTED]

[information regarding terms of payment]

- (f) State whether your company is related to FRUTEX. Give details of any financial or other arrangements (e.g. free goods, rebates, or promotional subsidies) with FRUTEX in Australia (including parties representing either your company or FRUTEX).

(f) No special agreements between our companies

- B-3 Do your company's 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.

The only price difference occurs only when quantities differ highly. For example the handling cost per kg is different when we sell a pallet instead of a container. What is more prepayment is a more preferable way of payment as it is safer and also helps the company with cash flows. Another factor to be considered is the contract. Because of the fact the prices may vary during year a contract binds the two sides for the period arranged and there might be a difference during a specific month or period

- B-4 Using the format shown in the table at **B-4 Australian sales**, list all shipments (i.e. transaction by transaction) to Australia to FRUTEX of the goods under consideration in the period of investigation. The notes at the bottom of the table provide an explanation of the terms used by Customs and Border Protection.

The following additional definitions should be noted:

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 export be reported. If estimates are made, your company 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 the costs in the table are further explained in Section E-1.

- B-5 If there are any other costs, charges or expenses incurred in respect of the exports listed above that 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.

- B-6 For each type of discount, rebate, and allowance offered on export sales to Australia to FRUTEX:

- provide a description; and
- explain the terms and conditions that must be met by the importer to obtain the discount.

Where the amounts of these discounts, rebates etc are not identified on the sales invoice, explain how the amount has been calculated shown in the response to question B4.

[redacted] [information regarding Aeghion's policies with respect to the application of discounts]

B-7 If your company has issued credit notes (directly or indirectly) to FRUTEX, 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.

[redacted] information regarding terms of sale with respect to export sales to FRUTEX]

B-8 If the delivery terms make your company responsible for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert the information in the relevant columns in table B-4 Australian Sales.

[redacted] [information regarding terms of sale]

B-9 Provide a complete set of all of the documentation relevant to each export sale to FRUTEX. 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 the port of loading;
- overseas freight invoices;
- marine insurance expenses; and
- letter of credit, and bank documentation, proving payment.

Please find attached the files **[redacted]**
[redacted] [confidential information regarding sales terms]

SECTION C EXPORTED GOODS & LIKE GOODS

- C-1 Fully describe all of the goods your company has exported to Australia to FRUTEX for arrival during the period of investigation. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the exported goods.

CARTONS OF 12,5KGS VOSTIZZA (currants [REDACTED])
[REDACTED] [confidential information regarding Aeghion's internal categorization of the subject goods exported to Australia]

And extra virgin olive in cans of 5lt and aslo extra virgin olive oil in pallets of 930 kg

- C-2 List each model/type of the good exported to Australia to FRUTEX. These models should cover all models listed in the [REDACTED] – see section B of this questionnaire.

CARTONS OF 12,5KGS VOSTIZZA 2012
CARTONS OF 12,5KGS VOSTIZZA 2011
And extra virgin olive in cans of 5lt (eliki)

- C-3 If your company sells like goods on the domestic market, for each model/type that your company has exported to Australia to FRUTEX during the investigation period, list these like goods sold domestically, and provide a detailed explanation of the differences where those goods sold domestically (i.e. the like goods – see explanation in glossary) are not identical to the goods exported to Australia.

They are identical

- 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.

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 your company is unable to provide the complete listing electronically your company **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 Customs and Border Protection requirements. If agreement cannot be reached as to the appropriate method, Customs and Border Protection may not visit your company.*

Customs and Border Protection 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), your company has reported that the date of sale is not the invoice date and your company considers that this alternative date should be used when comparing domestic and export prices –

*information **must** be provided on domestic selling prices for a matching period covering the dates of sale of the exported goods - even if doing so means that such domestic sales data predates the commencement of the investigation period.*

If your company does not have any domestic sales of like goods, your company must contact the case officer who will explain the information Customs and Border Protection requires for determining a normal value using alternative methods.

D-1 Provide:

- domestic price list (or internal pricing guide) covering the period of investigation;
- a detailed description of your company's 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 company, provide details of that association. Describe the effect, if any, that association has upon the price.

Regarding Greek market which is very small, please note that goods are loaded by truck either to the final destination (customer) or in the warehouses of the transportation company in Athens (customer arrange for the transportation to the final destination).

[redacted] [information regarding domestic sales processes]

For EU markets, goods are mainly loaded in 20ft container (FOB Piraeus port or C+F EU ports) or on truck (ex-factory or Door delivery).

[information regarding sales processes with respect to EU customers]

D-2 Do your company's 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.

No special pricing policy to our customers. Prices may vary between customers due to the different freight cost, the quantity of each order etc

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

- the way in which your company sets the price, receives orders, makes delivery, invoices and finally receives 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.

The price to the growers at the beginning of each season is fixed by

[information regarding pricing policies]

We make shipments according to orders we receive from the buyers.

Regarding payment

[explanation of terms of payment offered by Aeghion]

Also, orders are agreed in DDU basis and ex factory basis.

D-4 Prepare a spreadsheet using the format at table **D-4 Domestic Sales** listing all sales of like goods made during the investigation period. The listing must be provided on a computer disk. Include all of the following information.

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

D-5 If there are any other costs, charges or expenses incurred in respect of the sales listed that have not been identified in the table in question D-4 above, add a column for each item (see 'other factors').

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 the amounts shown in the response to question D4 have been calculated.

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

- D-7 Select two domestic sales in different quarters of the assessment 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).

Customs and Border Protection may select additional sales for verification at the time of its visit.

SECTION E FAIR COMPARISON

Section B sought information about the export prices to Australia to FRUTEX and Section D sought information about prices on your company's domestic market for like goods (i.e. the normal value).

Where the normal value and the export price are not comparable adjustments may be made. This section informs your company of the fair comparison principle and asks 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. Customs and Border Protection 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 Customs and Border Protection 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.

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. Customs and Border Protection will not consider new claims made after the verification visit.

E-1 Costs associated with export sales

(These cost adjustments will relate to your company's responses made at question B-4, '**Australian sales**')

1. Transportation

Explain how your company has 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.

According real cost, please find attached the file [redacted]
[redacted] [confidential information regarding sales terms]

2. Handling, loading and ancillary expenses

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

The various export related ancillary costs are identified in the table at question B4, for example:

- terminal handling;
- wharfage and other port charges;
- container taxes;
- document fees and customs brokers fees;
- clearance fees;
- bank charges;
- letter of credit fees; and
- other ancillary charges.

please find attached the file [redacted]
[redacted] [confidential information regarding sales terms]

3. Credit

The cost of extending credit on export sales is not included in the amounts quantified at question B4. However, Customs and Border Protection 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 for example, short term borrowing in the currency concerned.

We sell in Euro (€), We have long term and short term loans, [redacted]
[redacted] On average the interest is [redacted] (per year)
including bank expenses

If your company's accounts receivable show 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.

[redacted] [information regarding payment terms in relation to sales to Frutex]

4. **Packing costs**

List material and labour costs associated with packing the export product.

If applicable, 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**'.

Handling cost differ only buy the quantity

5. **Commissions**

Where any commissions have been paid in relation to the export sales to Australia to FRUTEX:

- 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.



6. **Warranties, guarantees, and after sales services**

Where these costs occur, show relevant sales contracts. Show how your company 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.

Our products comply with the highest food standards. There is no extra cost or any other warranty that aggravate to the costs.

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.

8. Currency conversions

In comparing export and domestic prices a currency conversion is required. Fluctuations in exchange rates can only be taken into account when there has been a 'sustained' movement during the period of investigation (see article 2.4.1 of the WTO Agreement). The purpose is to allow exporters 60 days to adjust export prices to reflect 'sustained' movements. Such a claim requires detailed information on exchange movements in your company's country over a long period that includes the investigation period.

We sell in Euro

E-2 Costs associated with domestic sales

(These cost adjustments will relate to your company's responses made at question D-4, 'domestic sales')

The following items are not separately identified in the amounts quantified at question D-4. However your company 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 quality of currant is measured in size: small, medium and ungraded. [redacted] [information regarding Aeghion's internal product characterization methodology and explanation of price variances between different product grades]

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 company's data.

2. Import charges and indirect taxes

If exports to Australia to FRUTEX:

- 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.

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.

There is no refund on taxes or duties remitted upon exportation to Australia

Duty drawback

Adjustment for drawback is not made in every situation where drawback has been received. Where an adjustment for drawback is appropriate, information must be provided 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, your company 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 your company 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;

There is no duty drawback as we produce the products in Greece and we do not import them from another country

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.

3. Level of trade

Question D-4 asks to indicate the level of trade to the domestic customer. To claim an adjustment for level of trade differences, the amount by which level of trade influences price needs to be quantified.

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 difference, 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 company's 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 company carries out the same activity when selling to FRUTEX in Australia;
- an explanation as to why your company considers that it is entitled to a level of trade adjustment.

We distinguish wholesalers, retailers, and end users according to the amount of order.

Frutex is a wholesaler as the company [REDACTED]

[REDACTED] **[confidential information regarding commercial arrangements between Aeghion and Frutex]**

or

- (b) *level discount*: the amount of the discount granted to purchasers who are at the same level of trade as FRUTEX 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.



4. Credit

The cost of extending credit on domestic sales is not included in the amounts quantified at question D-4. However, Customs and Border Protection 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.

The average interest rate is 

Provide the applicable interest rate over each month of the investigation period.

If your company's accounts receivable show 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*

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.

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.

████████████████████ [confidential calculation of turnover ratio]

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.

████████████████████ [confidential calculation of average credit period]

The following items are identified in the amounts quantified at question D-4:

5. Transportation

Explain how the amount of inland transportation associated with the domestic sales (**'Inland transportation Costs'**) has been quantified. 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.

ACCOUNT ██████████ SALES TRANSPORTATION EXPENSES

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.

ACCOUNT ██████████ SALES TRANSPORTATION EXPENSES

7. Packing

List material and labour costs associated with packing the domestically sold product. If applicable, 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**'.

████████████████████ [information regarding calculation and allocation of packing costs]

8. Commissions

Where any commissions have been paid in relation to the domestic sales:

- provide a description; and
- 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.

████████████████████ OTHER COMMISSIONS

9. Warranties, guarantees, and after sales services

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

No warranties, guarantees, and after sales services

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.

E-3 Duplication

In calculating the amount of the adjustments, your company must ensure that there is no duplication.

For example:

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

Separate adjustment items must avoid duplication.

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

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

Your company's response to this part of the questionnaire may be used by Customs and Border Protection 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. Customs and Border Protection 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 Using the column names and column descriptions in the table **F-1 Third Country**, provide a summary of your company's export sales to countries other than Australia.
- F-2 Please identify any differences in sales to third countries, which may affect their comparison to export sales to FRUTEX in Australia.

SECTION G

COSTING INFORMATION AND CONSTRUCTED VALUE

The information that your company supplies 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 – i.e. of the goods exported to FRUTEX in Australia; and*
- making certain adjustments to the normal value.*

Your company 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. Your company 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 (e.g. non-operating expenses not included elsewhere) associated with the goods.

In the 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) your company:

- reported that the date of sale is not the invoice date and considers 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)*

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

At any verification meeting your company 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.

G-2. Provide information about your company's total production in the table **G-2 Production.**

Rather than showing a 'name-plate' optimal capacity it is more meaningful to show the maximum level of production that may reasonably be attained under normal operating conditions. For example assuming: normal levels of maintenance and repair; a number of shifts and hours of operation that is not abnormally high; and a typical production mix.

G-3. Cost accounting practices

1. Outline the management accounting system that your company maintains and explain how that cost accounting information is reconciled to your company's audited financial statements.

According Greek GAAP we use analytic accounting

2. Is your company's cost accounting system based on standard (budgeted) costs? State whether standard costs were used in the responses to this questionnaire. If they were state whether all variances (i.e. differences between standard and actual production costs) have been allocated to the goods - and describe how those variances have been allocated.

We used actual cost

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

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

We use [REDACTED], please see the attached file [REDACTED]

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

[REDACTED] **[explanation of cost allocation methodologies]**

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

[REDACTED] **[explanation of Aeghion's internal product specifications]**

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

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.

There no start-up operations in relation to the goods under consideration

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.

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

1. Please provide (in the format shown in table **G-4 Domestic CTMS**) the actual unit cost to make and sell each model/type (identified in section C) of the like goods sold on the domestic market. Provide this cost data for each quarter over the investigation period. If your company calculates costs monthly, provide monthly costs.
2. Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting the calculations.
3. Provide this information for each quarter (or month if your company calculates costs on a monthly basis) over the period of the investigation.
4. Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.


5. If your company is 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.
6. Please specify unit of currency.

Euro €
7. Also, provide an explanation of the allocation of selling, administration and finance costs to the like goods.

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

1. Prepare this information in the table named '**G-5 Australian CTMS**'.
2. Provide this information for each quarter (or month if your company calculates costs on a monthly basis) over the period of the investigation.
3. Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.

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

4. 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.
5. Please specify unit of currency.
- G-6 Where there are cost differences between goods sold to the domestic market and those sold for export, give reasons and supporting evidence for these differences.
- G-7 Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your company's general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.
- G-8 In calculating the unit cost to make and sell, provide an explanation if the allocation method used (e.g. number, or weight etc) to determine the unit cost differs from the prior practice of your company.

G-9 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 that your company has shown for the goods (e.g. market prices, transfer prices, or actual cost of production)

Where an associate of your company produces the major input, Customs and Border Protection will compare the 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.

If the major input is purchased from an integrated production process, detailed information on the full costs of production of that input should be provided.

**SECTION H
EXPORTER'S DECLARATION**

I hereby declare that Agricultural Cooperatives Union S.A.(company) did, during the period of investigation, export the goods under consideration and have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

I hereby declare that.....(company) did not, during the period of investigation, export the goods under consideration and therefore have not completed the attached questionnaire.

Name :.SOTIROPOULOS ATHANASIOS

Signature :.....

**Position in
Company** :.CHAIRMAN OF THE BOARD

Date :.....

SECTION I CHECKLIST

This section is an aid to ensure that all sections of this questionnaire have been completed.

Section	Please tick if responses to all questions in that section have been provided
Section A – general information	<input checked="" type="checkbox"/>
Section B – export price	<input type="checkbox"/>
Section C – like goods	<input type="checkbox"/>
Section D – domestic price	<input type="checkbox"/>
Section E – fair comparison	<input type="checkbox"/>
Section F – exports to third countries	<input type="checkbox"/>
Section G – costing information	<input type="checkbox"/>
Section H – declaration	<input type="checkbox"/>

Electronic Data	Please tick if a spreadsheet has been provided
INCOME STATEMENT	<input type="checkbox"/>
TURNOVER – sales summary	<input type="checkbox"/>
AUSTRALIAN SALES – list of sales to Australia	<input type="checkbox"/>
DOMESTIC SALES – list of all domestic sales of like goods	<input type="checkbox"/>
THIRD COUNTRY – third country sales	<input type="checkbox"/>
PRODUCTION – production figures	<input type="checkbox"/>
DOMESTIC COSTS – costs of goods sold domestically	<input type="checkbox"/>
AUSTRALIAN COSTS – costs of goods sold to Australia	<input type="checkbox"/>