#### PUBLIC RECORD

### APPLETON LUFF PTE LTD

INTERNATIONAL LAWYERS

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2 9 OCT 2012

October 29, 2012

**BY E-MAIL** 

International Trade Remedies Branch Australian Customs and Border Protection Service 5 Constitution Avenue Canberra act 2601 Australia Attention: Director Operations 2

Re: <u>Anti-Dumping Investigation on Zinc Coated (Galvanized) Steel from the People's</u> <u>Republic of China, the Republic of Korea and Taiwan (Investigation No. 190a)</u>

Dear Sir or Madam:

On behalf of Asiazone Co., Limited ("Asiazone"), a producer/exporter of the goods under consideration originating in Taiwan, we hereby submit the exporter questionnaire response for the above-captioned proceeding.

Please let us know if you have any questions regarding this submission. In the future correspondences please communicate to the following personnel of Appleton Luff: Jay Nee (nee@appletonluff.com) and Huibin Zhang (zhang@appletonluff.com) in the above-referenced proceeding.

Very truly yours,

Jeffre

Jay Y. Nee

Appleton Luff is a specialty law firm focusing on issues of international trade, cross-border commerce, arbitration, investment and public international law. The firm operates as separately incorporated law offices located in Brussels, Geneva, Singapore, Warsaw and Washington, D.C.



EMAIL:

#### International Trade Remedies Branch

#### **EXPORTER QUESTIONNAIRE - TAIWAN**

PRODUCT CONCERNED:	ZINC COATED (GALVANISED) STEEL FROM THE PEOPLE'S REPUBLIC OF CHINA, THE REPUBLIC OF KOREA AND TAIWAN
INVESTIGATION PERIOD:	1 JULY 2011 TO 30 JUNE 2012
RESPONSE DUE BY:	29 OCTOBER 2012
ADDRESS FOR RESPONSE:	International Trade Remedies Branch Australian Customs and Border Protection Service 5 Constitution Avenue Canberra act 2601 Australia Attention: Director Operations 2
CASE MANAGER: TELEPHONE: FAX:	Ms Christie Sawczuk +61-2-6275-5965 +61-2-6275-6990

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

itrops2@customs.gov.au

#### TABLE OF CONTENTS

Abbreviations
Glossary of Terms4
Background and General Instructions9
Section A - Company structure and operations17
Section B - Sales to Australia (export price)26
Section C – Exported Goods & Like goods
Section D - Domestic sales
Section E - Fair comparison41
Section F - Export sales to countries other than Australia51
Section G - Costing information and constructed value
Section H – Exporter/Producer's declaration
Section I - Checklist

#### ABBREVIATIONS

the Act	the Customs Act 1901
China	the People's Republic of China
CISA	China Iron and Steel Association
CTMS	cost to make and sell
Customs and Border	the Australian Customs and Border Protection Service
Protection	the Australian Oustoms and Border Protection Bervice
EPZ	Export Processing Zones
FIE*	foreign invested enterprise
GOC*	Government of China
	the goods the subject of the application (Galvanised
the goods	Steel)
HRC	hot-rolled coil
	hot-rolled steel (both HRC and narrow strip
HRS	collectively)
the investigation period	1 July 2011 to 30 June 2012
Korea	the Republic of Korea
SASAC	the State-owned Assets Supervision and
	Administration Commission of the State Council
SEZ*	special economic zone
SIE*	state-invested enterprise

\*Refer to this questionnaire's Glossary of Terms for a definition.

#### **GLOSSARY OF TERMS**

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

#### Adjustments

To enable a fair comparison between the export price and the normal value Australian legislation provides for the adjustment of the domestic price paid for like goods. Adjustments are made to account for sales occurring at different times, specification differences, and differences in the terms or circumstances of the sales. The adjustment to the normal value may be upward or downward. Areas where you believe an adjustment is necessary should be identified. Section E of the questionnaire refers.

Examples of adjustments that may be made include: sales occurring at different times (it is sometimes necessary to compare domestic and export sales made at different times - in these circumstances an adjustment may be made to reflect price movements during that time); specification differences; packaging; taxes; level of trade; advertising; servicing/warranty; inland freight; warehousing; export charges; credit terms; duty drawback; commissions.

Adjustments may also be required where the normal value is based upon costs to make and sell.

#### Arms length

Sales are not considered to be at "arms length" on your domestic market if there is any consideration payable for the goods other than their price, or there is an association between the buyer and the seller which affects the price, or there will be a reimbursement, compensation or benefit for, or in respect of, the price.

#### **Associated Companies**

Persons shall be deemed to be associates of each other if, and only if:

(a) both being natural persons:

(i) they are connected by a blood relationship or by marriage or by adoption; or
(ii) one of them is an <u>officer</u> or director of a body corporate controlled, directly or indirectly, by the other;

(b) both being bodies corporate:

(i) both of them are controlled, directly or indirectly, by a third <u>person</u> (whether or not a body corporate); or
(ii) both of them together control, directly or indirectly, a third body corporate; or
(iii) the same <u>person</u> (whether or not a body corporate) is in a position to cast, or control the casting of, 5% or more of the maximum number of

votes that might be cast at a general meeting of each of them; or

(c) one of them, being a body corporate, is, directly or indirectly, controlled by the other (whether or not a body corporate); or Galvanised Steel (190a) - exporter questionnaire response Asiazone Co., Limited (d) one of them, being a natural <u>person</u>, is an employee, <u>officer</u> or director of the other (whether or not a body corporate); or

(e) they are members of the same partnership.

#### Constructed value

In cases where domestic prices paid for the GUC in the country of export cannot be used for the determination of normal value, i.e. when there are no or insufficient sales or where such sales were not made in the ordinary course of trade, normal value may be based on a constructed value. Constructed value is calculated on the basis of the cost of production of the GUC plus a reasonable amount for selling, general and administration costs, and for profits, that are associated with sales on the domestic market of the country of export.

#### Cost of production/manufacturing

The cost of production or manufacture consists of all manufacturing costs associated with the goods. It is the sum of direct materials, direct labour and factory overheads.

#### Cost to make and sell (CTMS)

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.

#### Country of origin

The country in which the last significant process in the manufacture or production of the goods was performed.

#### Date of sale

Customs and Border Protection will normally use the invoice date as recorded in the exporter or producer's records. Another date may be used if this better reflects the material terms of sale. The questionnaire directs attention to matching data sets of domestic and export sales where some other date is used, as well as matching cost information.

#### **Direct labour cost**

Direct labour is categorised as a variable cost, i.e. the value varies with the level of production.

#### Dumping

Dumping occurs when the products of one country are exported to another country at a price less than their normal value.

#### Dumping margin

Where the export price is less than the normal value the dumping margin is the amount of the difference. It can be expressed as a value or as a percentage of the export price.

#### Enterprise

"Enterprise" includes a group of enterprises, an industry and/or a group of industries.

#### Export price

The export price of the goods is usually the price paid or payable to the exporter in arms length transactions, in most instances calculated at the Free on Board (FOB) level.

#### Exporting country

The country of export is normally the country of origin from which the goods are shipped. The country of export may be an intermediate country, except where the products are merely transhipped through that country, or the products concerned are not produced in that country, and there is no comparable price in that country.

#### Factory overheads

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

#### Goods under consideration (GUC)

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

#### Incoterms

The following abbreviations are commonly used (comment is provided concerning costs that are normally borne by the seller):

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the sellers premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs and Border Protection formalities, taxes etc paid if required)
FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance) the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CPT	carriage paid to
CIP	carriage and insurance paid to the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried by air, road, rail etc
DAF	delivered at frontier (goods carried by rail or road and cleared for export at the named place at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer's disposal)

#### PUBLIC RECORD

DES	delivered ex ship (goods made available to the buyer on board the ship uncleared for import at the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc incurred upon importation)

#### Investigation period

A period defined by Customs and Border Protection over which importations of the goods are examined.

#### Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the GUC or that, although not alike in all respects have characteristics closely resembling those of the GUC. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

#### Normal value

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based upon all costs to make and sell the goods. Profit may also be included if the sales on the domestic market are profitable. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, Customs and Border Protection will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

#### Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be constructed from costs to make and sell.

#### Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- domestic sales of like goods;
- sale of goods of the same general category by the exporter; or
- sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director's fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.

#### **BACKGROUND AND GENERAL INSTRUCTIONS**

#### 1. BACKGROUND

Following an application by BlueScope Steel Limited (BlueScope Steel), an Australian industry member, the Australian Customs and Border Protection Service (Customs and Border Protection) has initiated:

 an investigation into allegations that certain Galvanised Steel and Aluminium Zinc Coated Steel from the People's Republic of China (China), the Republic of Korea (Korea) and Taiwan have been exported to Australia at dumped prices, and because of that dumping, material injury has been caused to an Australian industry producing like goods.

A notice advising initiation of the investigation and review was published in *The Australian* on <u>05 September 2012</u>. Australian Customs and Border Protection Dumping Notice (ACDN) No. 2012/40 outlining the details of the investigation, and the procedures to be followed during the investigation can be accessed on the Customs and Border Protection website at <u>www.customs.au</u> (follow the links to anti-dumping, current cases and public record).

#### 2. THE GOODS UNDER CONSIDERATION (GUC)

#### Description

Our records indicate that your company is a <u>major</u> exporter of galvanised steel (the goods), i.e. the goods exported to Australia, allegedly at dumped prices. The applicant provided further details of the goods as follows:

#### General description

The application specifies that:

#### (i) Galvanised steel

The imported goods the subject of the Galvanised Steel Application are:

"flat rolled products of iron and non-alloy steel of a width less than 600mm and, equal to or greater than 600mm, plated or coated with zinc".

The goods the subject of the application (the goods) are generically called galvanised steel (referring to zinc coated steel). The application stated that trade and other names often used to describe Galvanised steel, include:

- "GALVABOND®" steel;
- "ZINCFORM®" steel;
- "GALVASPAN®" steel;
- "ZINCHITEN®" steel;
- "ZINCANNEAL"steel;
- "ZINCSEAL"steel;
- Galv;
- GI;
- Hot Dip Zinc coated steel;

Galvanised Steel (190a) - exporter questionnaire response Asiazone Co., Limited

- Hot Dip Zinc/iron alloy coated steel; and
- Galvanneal.

The application noted that the amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m2) with the prefix being Z (Zinc) or ZF (Zinc converted to a Zinc/Iron alloy coating). The applicant claims that the common coating masses used for zinc coating are: Z350, Z275, Z200, Z100, and for zinc/iron alloy coating are ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.

#### Standards

#### (i) Australia

The applications state that the Australian and New Zealand Standard Industrial Classification Code applicable to galvanised steel and aluminium zinc coated steel is category 2711.

#### (ii) International

The applications state that there are a number of relevant International Standards for galvanised steel and aluminium zinc coated steel products that cover a range of products through specific grade designations, including the recommended or guaranteed properties of each of these product grades.

International Standards	Product Grades	
General and Commercial Grades		
AS/NZS 1397	G1, G2	
ASTM A792	CS, type A, B and C	
EN10346	DX51D, DX52D	
JIS 3321	SGLCC	
Forming, Pressing & Drawing Grades		
AS/NZS 1397	G3	
ASTM A792	FS, DS	
EN10346	DX53D, DX54D	
JIS 3321	SGLCD, SGLCDD	
Structural Grades		
AS/NZS 1397	G250, G300, G350, G450, G500, G550	
ASTM A792	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)	
EN10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD	
JIS 3321	SGLC400, SGLC440, SGLC490, SGLC570	

#### Tariff classification

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

- 7210.61.00 (statistical codes 60,61 and 62)
- 7210.49.00 (statistical codes 55,56,56 and 58)
- 7212.30.00 (statistical codes 61)

The GUC exported to Australia from Korea and Taiwan are subject to a 5% rate of duty (DCT Countries). Galvanised Steel (190a) - exporter questionnaire response Asiazone Co., Limited For China the GUC exported to Australia are subject to a 0% rate of duty (DCS Country).

There are several Tariff Concession Orders (TCOs) applicable to the relevant tariff classification subheading 7210.49.00 for galvanised steel.

#### 3. INVESTIGATION PERIOD

The existence and amount of any dumping in relation to Galvanised Steel exported to Australia from China, Korea and Taiwan will be determined on the basis of an investigation period from *1 July 2011 to 30 June 2012* (hereinafter referred to as 'the investigation period').

Customs and Border Protection will examine details of the Australian market from 1 July 2007 for injury analysis purposes.

#### 4. WHY YOU HAVE BEEN ASKED TO FILL OUT THIS QUESTIONNAIRE?

Either; the application, an importer of Galvanised Steel or data contained within Customs and Border Protection's commercial database has identified you as a potential exporter of Galvanised Steel to Australia during the investigation period.

Consequently, Customs and Border Protection has forwarded you this questionnaire and the associated spreadsheet '*Exporter questionnaire – Galvanised Steel – TAIWAN*' accompanying spreadsheet to provide you with the opportunity to participate and cooperate with its investigation.

Customs and Border Protection may use information provided by exporters to determine:

• the normal values and export prices of the GUC over the investigation and review periods; and

Customs and Border Protection may use the information you provide to determine whether Galvanised Steel exported by your company to Australia was dumped.

You may make separate submissions concerning any other matter relevant to Customs and Border Protection inquiries.

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

#### 5. WHAT HAPPENS IF YOU DO NOT RESPOND TO THIS QUESTIONNAIRE?

You do not have to complete the questionnaire. However, if you do not respond Customs and Border Protection may be required to rely on information supplied by other parties in making its assessments as to whether Galvanised Steel exported to Australia was dumped (this may include information supplied by the Australian industry). If you do not provide all of the information sought, or if you do not allow Customs and Border Protection to verify the information you provide (see below), we may deem that you did not cooperate with the investigation.

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

#### 6. IF YOU DECIDE TO RESPOND

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

#### For Official Use Only and Public Record versions

If you choose to respond to this questionnaire, you are <u>required</u> to lodge a *For Official Use Only* version and a *Public Record* version of your submission by the due date (due date is specified on front cover).

In submitting these versions, please ensure that <u>each</u> page of the information you provide is clearly marked either '*For Official Use Only'* and *'Public Record'* versions.

All information provided to Customs and Border Protection in for official use only will be treated accordingly.

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

It is <u>not</u> expected that the public record version of your submission would include commercially sensitive information. However it must contain sufficient detail to allow a reasonable understanding of the substance for official use only version. If, for some reason, you cannot produce a public record version, please contact the investigation Case Manager (see contact details on page 1 of this questionnaire).

You can access the public record electronically online at <u>www.customs.gov.au</u> (follow the links to anti-dumping, current cases and public record)

#### **Declaration**

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

#### Consultants/parties acting on your behalf

If you intend to have another party acting on your behalf please advise Customs and Border Protection of the relevant details.

Customs and Border Protection will generally require written authorisation from exporters and manufacturers for any party acting on its behalf.

#### 7. DUE DATE FOR RESPONSE

Manufacturers and exporters are requested to respond to this questionnaire and return it to Customs and Border Protection within the time specified on the cover.

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

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

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

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

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

Customs and Border Protection may consider granting a small extension of time for lodgement of your submission if you provide a sufficient reason as outlined above.

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

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

#### 8. VERIFICATION OF THE INFORMATION THAT YOU SUPPLY

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

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

Verification visits may take several days.

During this verification, we will seek 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. You will need to ensure that any supplementary material such as spreadsheets, calculations etc that you used to prepare or compile your response are available. We will need to consult with your staff, particularly your financial controller (or accountant) and your domestic and export sales people. We may also need to see your factory, in which case we will need to consult with your operational managers.

After gathering the information we will prepare a report of the visit.

We will provide you with a draft of the report and then respond to any questions that you may want to ask. We will also ask you to assist in the preparation of a non-confidential copy of the report for the public record.

#### 9. OUTLINE OF INFORMATION REQUIRED BY THIS QUESTIONNAIRE

- **Section A** General information relating to your company including financial reports.
- **Section B** A complete list of your company's exports to Australia over the investigation period.
- **Section C** A list of goods sold on the domestic market of the country of export (like goods) that may be compared to the GUC.
- Section D A detailed list of all of your company's sales of like goods in your domestic market.
- **Section E** Information to allow a fair comparison between export and domestic prices.
- Section F Information in relation to your company's exports of like goods to countries other than Australia. This may be particularly relevant if you have not exported to Australia in significant volumes in more recent times.
- **Section G** Costs to make and sell, for exports to Australia and for the domestic market.
- Section H Your declaration
- Section I Submission checklist

#### **10. GENERAL INSTRUCTIONS FOR PREPARING YOUR RESPONSE**

- When answering the questionnaire please carefully read all instructions. Customs and Border Protection requires a response to all sections of this questionnaire. Please provide an explanation if a question is not relevant to your situation.
- All documents and source material submitted in response to this questionnaire, including financial statements, must be translated into English.
- Answer questions in the order presented in the questionnaire. Please ensure that information submitted conforms to the requested format and is clearly labelled. Please repeat the question to which you are responding and place your answer below it.

- Identify source documents and advise where they are kept. During on-site verification you should be prepared to substantiate all the information you have submitted. Every part of the response should be traceable to company documents that are used in the ordinary course of business.
- You should retain all work sheets used in answering the questionnaire, in particular those linking the information supplied with management and accounting records. This will help to verify the information.
- Clearly identify all units of measurement and currencies used. Apply the same measurement consistently throughout your response to the questionnaire.

#### **11. INSTRUCTIONS ON PROVIDING ELECTRONIC DATA**

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

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

#### **12. FURTHER INFORMATION**

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

- the booklet Australia's Anti-Dumping and Countervailing Administration;
- Australian Customs Dumping Notice 2012/40 notifying the initiation of the investigation; and
- the Glossary of Terms within this questionnaire.

It is also recommended that you access and read the non-confidential version of BlueScope Steel's application which is available online on the Electronic Public Record at <u>www.customs.gov.au</u> (follow the sub-links to anti-dumping, current cases and public record)

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

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

#### **SECTION A - COMPANY STRUCTURE AND OPERATIONS**

This section requests information relating to company details and financial reports.

#### A-1 IDENTITY AND COMMUNICATION

Please nominate a person within your company who can be contacted for the purposes of this investigation:

#### Head office:

Name: Position in the company: Address: Telephone: Facsimile number: E-mail address of contact person:

#### Factory:

Address: Telephone: Facsimile number: E-mail address of contact person:

<u>ANSWER:</u> Please see below for the contact person of Asiazone Co., Limited ("Asiazone"):

Name: Mr. Louis Huang Position in the company: Manager Address: 20<sup>th</sup> floor, Tesbury Center, 28 Queen's road east, Hong Kong Telephone: +852-22198988 Facsimile number: +852-22198788 E-mail address of contact person: <u>Louis@asiazone.com.hk</u>

#### 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: Organisation: Position: Address: Telephone: Facsimile/Telex number: E-mail address of contact person:

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.

<u>ANSWER:</u> Please see the following for the contact information of Asiazone's representative:

Name: Jay Y. Nee Organisation: Appleton Luff Pte. Ltd. Position: Partner Address: One Raffles Quay, Level 25, North Tower, Singapore 048583 Telephone: +65-6519-2083 Facsimile/Telex number: +65-6725-0803 E-mail address: nee@appletonluff.com

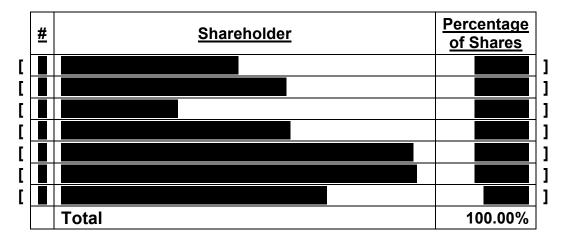
#### A-3 COMPANY INFORMATION

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 you use to export and/or sell goods.

# <u>ANSWER:</u> Asiazone's legal name of the business under investigation is Asiazone Co., Limited. Asiazone is a trading company incorporated in Hong Kong.

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).

### <u>ANSWER:</u> Please see below for a table showing Asiazone's shareholders:



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

### <u>ANSWER:</u> Asiazone is not a subsidiary of any other company. Thus, this question is not applicable.

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

### <u>ANSWER:</u> Asiazone is not a subsidiary of any other company. Thus, this question is not applicable.

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

#### ANSWER: Please see Exhibit 1 for a list Asiazone's affiliates.

It should be noted that Asiazone's major shareholders Yieh Phui Enterprise Co., Ltd. ("Yieh Phui") and Yieh United Steel Corporation ("YUSCO") are both members of the "E United Group". On March 29, 2003, Mr. I. S. Lin, the chairman of both Yieh Phui and YUSCO, established the "E United Group". "E United Group" is not a legal entity but a group of companies associated with Mr. Lin. No individual or organization controls the mission of "E United Group" and the group functions by general consensus. There are no assigned personnel in operating the "E United Group", nor are any periodical meetings. Nonetheless, "E United Group" still functions as a platform that the staff of the group companies can discuss and communicate with each other to improve each company's performance by sharing the company's business operations. Please see Exhibit 2 for a brochure of "E United Group" where in page 2 a diagram of companies regularly included in the group is shown. Information regarding "E United Group" can also be accessed at its web site at http://www.e-united.com.tw/.

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

# <u>ANSWER:</u> Asiazone does not have a parent company, nor does other related company charge any management fees/corporate allocations to Asiazone.

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

# <u>ANSWER:</u> Asiazone is a trading company involved in the buy-sale of various steel products including galvanized steel, aluminium zinc coated steel, pre-painted steel. Asiazone is also engaged in the trading of metal materials used for the production of steel products such as zinc ingots, aluminium ingots, and alloys, etc.

- **8.** If your business does not perform all of the following functions in relation to GUC, then please provide names and addresses of the companies which perform each function:
  - produce or manufacture
  - sell in the domestic market
  - export to Australia, and

• export to countries other than Australia.

<u>ANSWER:</u> Asiazone is a trading company and does not engage in any production activities of steel products. During the investigation period, Asiazone purchased the GUC from Yieh Phui Enterprise Co., Ltd. in Taiwan and resold them to Australia and countries other than Australia.

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

### <u>ANSWER:</u> Please see <u>Exhibit 3</u> for Asiazone's internal organization chart.

**10.** Provide a list of your business' Board of Directors, Managing Director (or CEO) and Senior Executives.

ANSWER: Please see below a list of Asiazone's board of directors:

<u>SEQ</u>	POSITION	NAME
1	Chairman	Wu, Lin-Maw

- 1 Chairman Wu, Lin-Maw 2 Director Chang, Tien-Chi
- **11.** Provide a copy of your most recent annual report together with any relevant brochures or pamphlets on your business activities.

### <u>ANSWER:</u> Asiazone does not prepare annual report in its normal course of business. Nor does Asiazone have its own company brochure.

- **12.** Provide details of <u>all</u> transactions between your company and all related parties. For example:
  - Suppling/selling completed or partially completed products.
  - Suppling/selling raw materials.
  - Performing management functions (including any financial functions).
  - Processing (including toll processing) of any raw materials, intermediary or completed products.
  - Trading in products/materials supplied by related parties.

ANSWER: Please see Exhibit 4 for the requested information for Asiazone.

#### A-4 GENERAL ACCOUNTING/ADMINISTRATION INFORMATION

1. Indicate your accounting period.

Galvanised Steel (190a) - exporter questionnaire response Asiazone Co., Limited

### <u>ANSWER:</u> Asiazone uses the calendar year, i.e. from January 1 through December 31, as its financial accounting period.

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

### <u>ANSWER:</u> The financial records of Asiazone are kept in its office at the address indicated in the answer to item A.1. above.

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

These documents should relate to:

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

### <u>ANSWER:</u> Please see the following exhibits for the above-requested information:

- <u>Exhibit 5</u>: Asiazone's chart of accounts
- <u>Exhibit 6</u>: annual audited financial statements of 2010
- <u>Exhibit 7</u>: annual audited financial statements of 2011
- <u>Exhibit 8</u>: internal monthly financial statements from July 2011 to June 2012

### Please note that Asiazone does not have any financial statements prepared specifically regarding the production and sales of the GUC.

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

### <u>ANSWER:</u> This question is not applicable, as Asiazone is required to have the accounts audited on a yearly basis.

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

#### <u>ANSWER:</u> Asiazone's financial accounting practice is in accordance with generally accepted accounting principles of Hong Kong. Galvanised Steel (190a) - exporter questionnaire response

Asiazone Co., Limited

5. Describe:

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

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

<u>ANSWER:</u> Asiazone is a trading company and is not involved in any production activities. Thus, Asiazone does not have raw material or work-in-process inventories. In addition, as Asiazone does not own or operate warehouses for the goods purchased and resold, Asiazone does not have finished goods inventories.

 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);

<u>ANSWER:</u> Asiazone is a trading company and is not involved in any production activities. Thus, Asiazone does not incur cost of production. The costs incurred for purchasing the goods are recorded at its actual acquisition costs.

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

<u>ANSWER:</u> This question is not applicable as Asiazone is a trading company and is not involved in any production activities.

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

<u>ANSWER:</u> This question is not applicable as Asiazone is a trading company and is not involved in any production activities.

• valuation and revaluation methods for fixed assets;

# <u>ANSWER:</u> Fixed assets are stated at acquisition cost less accumulated depreciation. Depreciation is provided in straight-line methods over estimated useful lives for fixed assets.

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

<u>ANSWER:</u> Depreciation is provided in straight-line methods over estimated useful life for each class of production equipment within the time period. The useful life for furniture and equipment is 3 years and is depreciated at the rate of 20%.

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

<u>ANSWER:</u> Asiazone's accounting records and audited financial statements are presented in U.S. dollars, which is Asiazone's functional and presentation currency. Foreign currency transactions are initially recorded using the functional currency rates ruling at the date of the transactions. Monetary assets and liabilities denominated in foreign currencies are retranslated at the functional currency rates of exchange ruling at the end of the reporting period. All differences are taken to profit or loss. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was determined.

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

<u>ANSWER:</u> Asiazone's accounting records and audited financial statements are presented in U.S. dollars, which is Asiazone's functional and presentation currency. Foreign currency transactions are initially recorded using the functional currency rates ruling at the date of the transactions. Monetary assets and liabilities denominated in foreign currencies are retranslated at the functional currency rates of exchange ruling at the end of the reporting period. All differences are taken to profit or loss. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was determined.

• inclusion of general expenses and/or interest;

### <u>ANSWER:</u> General expenses and interest expenses are treated as operating expenses.

provisions for bad or doubtful debts, and treatment thereof in your accounts;

### <u>ANSWER:</u> Asiazone did not have any bad debts or doubtful debts during the investigation period.

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

### <u>ANSWER:</u> This question is not applicable, as Asiazone does not have any idle equipment, nor does it have any plant.

• costs of plant closure;

### <u>ANSWER:</u> This question is not applicable as Asiazone is a trading company and is not involved in any production activities.

• restructuring costs;

### <u>ANSWER:</u> Asiazone did not incur restructuring costs during the investigation period.

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

### <u>ANSWER:</u> This question is not applicable as Asiazone is a trading company and is not involved in any production activities.

• effects of inflation on financial statement information.

# <u>ANSWER:</u> This question is not applicable as the inflation is not significant and does not have effects on the financial statement during the investigation period.

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

### <u>ANSWER:</u> The accounting methods used by Asiazone have not changed over the last two years.

#### A-5 INCOME STATEMENT

Complete the spreadsheet entitled '**Income statement**' within the *Exporter questionnaire* – *Galvanised Steel* – *TAIWAN accompanying* spreadsheet provided alongside this questionnaire.

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

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

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

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

### <u>ANSWER:</u> Please see <u>Exhibit 9</u> for the spreadsheet named "Income Statement" for Asiazone.

#### A-6 SALES

Complete the spreadsheet entitled '**Turnover**' within the *Exporter questionnaire* – *Galvanised Steel* – *TAIWAN* – *accompanying spreadsheet* provided alongside this questionnaire.

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

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

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

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

### <u>ANSWER:</u> Please see <u>Exhibit 10</u> for the spreadsheet named "Turnover" for Asiazone.

#### 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 Customs and Border Protection may also compare prices at another level (e.g. ex factory).

You should report prices of all GUC shipped to Australia during the investigation period.

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

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

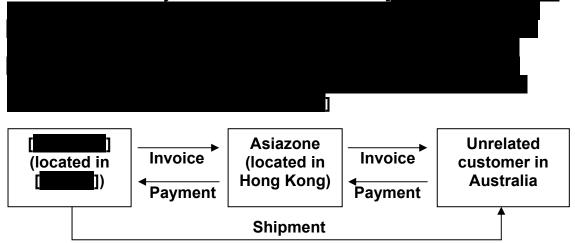
you **must** provide information in section D on domestic selling prices for a matching period - even if doing so means that such domestic sales data predates the commencement of the investigation period.

- **B-1** For each customer in Australia to whom you shipped goods in the investigation period list:
  - name;
  - address;
  - contact name and phone/fax number where known; and
  - trade level (for example: distributor, wholesaler, retailer, end user, original equipment).

#### ANSWER: Please see Exhibit 11 for the requested information.

- **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.

### <u>ANSWER:</u> During the investigation period, all of the goods under consideration sold by Asiazone to Australia were [



(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: As indicated above, for sales of GUC sold by Asiazone to Australia during the investigation period, [



There was no selling agent involved in the sales of GUC to Austrlia during the investigation period. Nor did Asiazone pay commission to party for sales of GUC to Australia.

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

<u>ANSWER:</u> Asiazone had a sales term of [**1**] for all of its sales of GUC to Australia during the investigation period. The ownership of GUC transferred from [**1**] to the Australian importer when the goods were loaded onto the vessel at local seaports under the [**1**] term. Asiazone did not make sales of GUC to Australia on DDP basis during the investigation period.

(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).

### <u>ANSWER:</u> Asiazone did not enter into any agency or distributor agreements in relation to the sales of GUC to the Australian market.

(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.

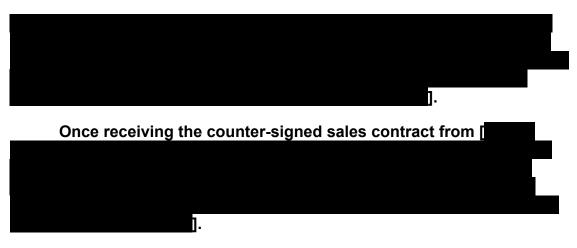
#### ANSWER: Asiazone [

[] for all of its sales of the GUC to Australia during the investigation period. Asiazone's sales of GUC to [\_\_\_\_\_] were all [\_\_\_\_\_] during the investigation period.

#### During the investigation period,



h.



After production, the merchandise was shipped directly from Taiwan to Australia. The commercial invoice and packing list were issued by [

The term of payment for Asiazone's export sales of GUC to Australia during the investigation period were based on its standard payment term (i.e., either "[]]" or "[]]").

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

<u>ANSWER:</u> Neither Asiazone nor its supplier [**Mathematical**] is related to the Australian customers. During the investigation, there was no arrangement on free goods, rebates, or promotional subsidies with the customer in Australia.

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

# <u>ANSWER:</u> Asiazone did not have any long-term contract or forward contract of the GUC in relation to sales to Australia during the investigation period.

**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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone had only one channel of distribution for sales of the GUI to Australia during the investigation period.

**B-4** Complete the spreadsheet entitled '**Australian sales**' within the Exporter Questionnaire *Galvanised Steel – TAIWAN – accompanying spreadsheet* provided alongside this questionnaire.

Galvanised Steel (190a) - exporter questionnaire response Asiazone Co., Limited This spreadsheet is to list **all** shipments (i.e. transaction by transaction) to Australia **of the GUC** (do not include non-GUC items) in the investigation period.

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

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

Column heading	Explanation
Customer name	names of your customers
Level of trade	the level of trade of your customers in Australia
Model/grade/typ e	commercial model/grade or type
Product code	code used in your records for the model/grade/type identified. Explain the product codes in your submission.
Product type	identify the finish product of the Galvanised Steel sold
Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale, report that date. For example, order confirmation, contract, or purchase order date.
Order number	if applicable, show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Shipping terms	Delivery terms e.g. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	agreed payment terms eg. 60 days=60 etc
Quantity	Quantity in units shown on the invoice. Show basis e.g. kg.
Gross invoice value	gross invoice value shown on invoice in the currency of sale, excluding taxes.
Discounts	if applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Rebates	The amount of any deferred rebates or allowances paid to the importer in the currency of sale.
Other charges	any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide a description.
Invoice currency	the currency used on the invoice
Exchange rate	Indicate the exchange rate used to convert the currency of the sale to the currency used in your accounting system

Net invoice value	the net invoice value expressed in your domestic currency as it is entered in your accounting system
Value	currency do it to entered in your decounting system
Other discounts	The actual amount of discounts not deducted from the
	invoice. Show a separate column for each type of
	discount.
Ocean freight**	the actual amount of ocean freight incurred on each export shipment listed.
Marine insurance	Amount of marine insurance
FOB export price**	the free on board price at the port of shipment.
Packing*	Packing expenses
Inland	inland transportation costs included in the selling price.
transportation	For export sales this is the inland freight from factory to
costs*	port in the country of export.
Handling,	handling, loading & ancillary expenses. For example,
loading &	terminal handling, export inspection, wharfage & other
ancillary	port charges, container tax, document fees & customs
expenses*	brokers fees, clearance fees, bank charges, letter of
	credit fees, & other ancillary charges incurred in the
	exporting country.
Warranty &	warranty & guarantee expenses
guarantee	
expenses*	
Technical	expenses for after sale services, such as technical
assistance &	assistance or installation costs.
other services*	
Commissions*	Commissions paid. If more than one type is paid insert
	additional columns of data. Indicate in your response to
	question B2 whether the commission is a pre or post
Other factors*	exportation expense having regard to the date of sale.
Other factors"	any other costs, charges or expenses incurred in relation
	to the exports to Australia (include additional columns as required). See question B5.

#### <u>Notes</u>

\*\* FOB export price and Ocean Freight:

<u>FOB export price:</u> 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.

<u>Ocean freight:</u> as ocean freight is a significant cost it is important that the <u>actual</u> 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.

<u>ANSWER</u>: Please see <u>Exhibit 12</u> for the Excel spreadsheet named "Australian Sales" of Asiazone. It should be noted that except for bank charges incurred for processing the payments received from Australian customers, Asiazone did not incur any other direct selling expenses for its sales of GUC to Australia during the investigation period.

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

### <u>ANSWER</u>: There are no other costs, charges or expenses incurred in respect of the exports listed in the Australian Sales.

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

Where the amounts of these discounts, rebates etc are not identified on the sales invoice, explain how you calculated the amount shown in your response to question B4. If they vary by customer or level provide an explanation.

### <u>ANSWER</u>: There is no discount, rebate and allowance offered on export sales to Australia. This question is thus not applicable.

**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.

# <u>ANSWER</u>: This question is not applicable, as Asiazone did not issue any credit notes to the customers in Australia during the investigation period.

**B-8** If the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (e.g. 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	Amount of inland transportation expenses within
transport	Australia included in the selling price
Other	Customs and Border Protection brokers, port and
costs	other costs incurred (itemise)

# <u>ANSWER</u>: This question is not applicable, as Asiazone had a delivery term of [**1**] for all of its sales of GUC to Australia during the investigation period.

- **B-9** Select <u>two</u> shipments, in different quarters of the investigation period, and provide a <u>complete</u> 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.

Customs and Border Protection will select additional shipments for payment verification at the time of the visit.

<u>ANSWER</u>: Please see <u>Exhibit 13</u> for Asiazone's sales documents of two shipments of GUC to Australia.

#### 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.

### <u>ANSWER:</u> During the investigation period, all of the GUC Asiazone exported to Australia were under the Australian Standard AS 1397.

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

<u>ANSWER:</u> In reporting the information in the column "Model" of the "Australian Sales" and the "Domestic Sales" listings, Asiazone has used a 6digit model code which incorporates the product characteristics including (1) coating type, (2) thickness, (3) width, (4) coating mass, and (5) product type. Please see the following for the coding system applied by Asiazone:

(1) Coating type

A = zinc coating (galvanized)

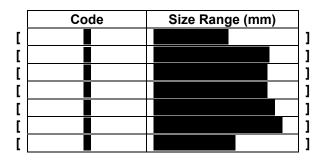
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#### (2) Thickness (Base Metal Thickness)

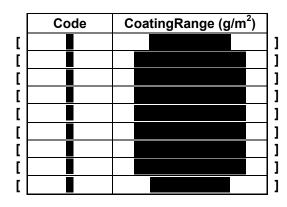
#### PUBLIC RECORD



#### (3) Width



#### (4) Coating Mass

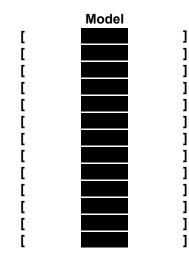


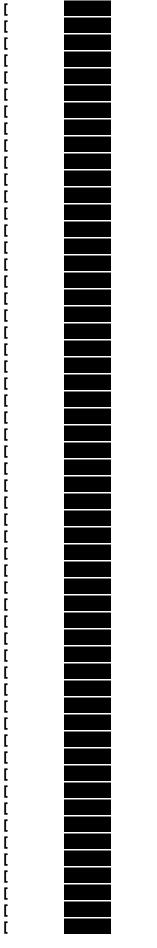
(5) Product type

1 = Without coil slitting, or without coil cutting

2 = With coil slitting (i.e., steel strip), or with coil cutting (i.e., cut-tolength)

During the investigation period, Asiazone exported the following models of GUC to Australia:





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

This should be done by completing the spreadsheet entitled 'Like goods' within the *Galvanised Steel - Exporter Questionnaire – TAIWAN – accompanying spreadsheet* provided alongside this questionnaire, detailing as follows:

EXPORTED MODEL	DOMESTIC MODEL	IDENTICAL?	DIFFERENCES
Product code of each model of the goods exported to Australia	Product code of comparable model sold on the domestic market of the country of export	If goods are identical indicate "YES". Otherwise "NO"	Where the good exported to Australia is not identical to the like goods, describe the specification differences. If it is impractical to detail specification differences in this table refer to documents which outline differences

# <u>ANSWER:</u> Please see <u>Exhibit 14</u> for the Excel spreadsheet entitled "Like Goods" for the requested information.

**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.

<u>ANSWER:</u> In its normal course of business, Asiazone relies on the product description stated on its purchase and sales invoices to identify the product it purchases and resells. During the investigation period, Asiazone sold only a small amount of the GUC in Hong Kong.

### **SECTION D - DOMESTIC SALES**

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

<u>All</u> domestic sales **of like goods to the GUC** made during the investigation period must be listed transaction by transaction. If there is an extraordinarily large volume of sales data <u>and</u> you are unable to provide the complete listing electronically you **must** contact the Case Manager **before** completing the questionnaire.

If the Case Manager agrees that it is not possible to obtain a complete listing he or she will consider a method for sampling that meets 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), you have reported that the date of sale is not the invoice date and you consider that this alternative date should be used when comparing domestic and export prices you **must** provide information on domestic selling prices for a matching period - even if doing so means that such domestic sales data predates the commencement of the investigation period.

If you do not have any domestic sales of like goods you must contact the Case Manager who will explain the information Customs and Border Protection 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.

<u>ANSWER:</u> During the investigation period, Asiazone had a small amount of GUC sold in the domestic market (i.e., in Hong Kong). All of these sales were made to local unrelated end-users with either a [**100**] or [CIF] term of delivery. The GUC of domestic sales made by Asiazone were either sourced from Yieh Phui or from an unrelated supplier in China. Asiazone did not have any agency or distributor agreements or other contracts entered into relation to the domestic market during the investigation period. Please see the following diagram showing the channel of distribution in the domestic market:

Asiazone	Unrelated end-user

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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone had only one channel of distribution for sales of the GUC in the domestic market during the investigation period.

- 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: Asiazone negotiated the selling prices and other terms with its domestic customer mainly based on Asiazone's acquisition cost (i.e., the purchase price in obtaining the GUC for sales). For the sales made by Asiazone in the domestic market during the investigation period, the selling prices include the cost of delivery. However, as the term of delivery in purchasing the GUC is identical to the term of delivery in making the resales (i.e., both were on a [100] basis), Asiazone did not incur any transportation costs.

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

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

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

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

Column Heading	Explanation
Customer name	names of your customers. If an English version of the name is not easily produced from your automated systems show a customer code number and in a separate table list each code and name.
Level of trade	the level of trade of your domestic customer
Model/grade/type	commercial model/grade or type
Product code	code used in your records for the model/grade/type identified. Explain the product codes in your submission.
Product Type	identify the finish product of the Galvanised Steel sold

Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this
	section. If you consider that a date other than 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	e.g. ex factory, free on truck, delivered into store
Payment terms	payment terms agreed with the customer e.g. 60
	days=60 etc
Quantity	quantity in units shown on the invoice e.g. kg.
Gross Invoice	gross value shown on invoice in the currency of
value	sale, net of taxes.
Discounts	the amount of any discount deducted on the
	invoice on each transaction. If a % discount
	applies show that % discount applying in another
	column.
Rebates	The amount of any deferred rebates or
	allowances paid to the importer in the currency of
	sale.
Net invoice value	the net invoice value expressed in your domestic
	currency as recorded in your accounting system
Other discounts	The actual amount of discounts not deducted from
	the invoice. Show a separate column for each
	type of discount.
Packing*	packing expenses
Inland	amount of inland transportation costs included in
transportation	the selling price.
Costs*	
Llavallia a. La a dia	
Handling, loading	handling, loading & ancillary expenses.
And ancillary	
Expenses*	Worrenty & guerentes syssess
Warranty &	warranty & guarantee expenses
Guarantee	
expenses*	
Technical	expenses for after sale services such as technical
assistance	assistance or installation costs.
& other services*	commissions poid If more than one type is a stat
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.

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

#### ANSWER: Please see Exhibit 15 for the spreadsheet named "Domestic Sales" of Asiazone.

**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.

# <u>ANSWER:</u> Asiazone did not incur any costs, charges or expenses in respective of the domestic sales of GUC it made during the investigation period.

- **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.

# <u>ANSWER:</u> Asiazone did not incur any commission, discount, rebate or allowance for its domestic sales of GUC it made during the investigation period.

**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 <u>complete</u> 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 will select additional sales for verification at the time of our visit.

# <u>ANSWER:</u> Please see <u>Exhibit 16</u> for the sales documents of the only two domestic sales Asiazone made during the investigation period.

### **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 (i.e. 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. 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.

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. 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 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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any transportation cost for its sales of GUC to Australia during the investigation period.

#### 2. Handling, loading and ancillary expenses

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

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

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

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any handling, loading or ancillary expenses for its sales of GUC to Australia during the investigation period.

#### 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 e.g. 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.

#### <u>ANSWER:</u> Asiazone did not incur any credit cost for its sales of GUC to Australia during the investigation period because the Australian customer was required to make payment in full before shipment of the GUC.

#### 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**'.

#### 

#### 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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any commissions in relation to its sales of GUC to Australia during the investigation period.

#### 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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any cost on warranties, guarantees or any after sales services in relation to its sales of GUC to Australia during the investigation period.

#### 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: There are no other factors for which an adjustment is required.

#### 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 investigation period (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.

# <u>ANSWER:</u> Currency conversion is not a factor to be considered as an adjustment because both of Asiazone's sales to Australia and Hong Kong were made in U.S. dollars during the investigation period.

#### 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.

# <u>ANSWER:</u> Asiazone does not claim an adjustment on physical characteristics because the GUC sold on the domestic market are identical to those sold to Australia during the investigation period.

#### 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.

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 <u>the import duty borne by the domestic sales</u>. (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 please provide <u>full</u> details about the operation of the scheme as well as providing the information requested above.

# <u>ANSWER:</u> This question is not applicable, as both of Asiazone's sales to Australia and in Hong Kong are tax free.

#### 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.

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 manufacturer.

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

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

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

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

This requires the following information:

- a detailed description of each sales activity performed in selling to your domestic customers (for example sales personnel, travel, advertising, entertainment etc);
- the cost of carrying out these activities in respect of like goods;
- for each activity, whether your firm carries out the same activity when selling to importers in Australia;
  - an explanation as to why you consider that you are entitled to a level of trade adjustment.
- or
- (b) level discount: the amount of the discount granted to purchasers who are at the same level of trade as the importer in Australia. This is determined by an examination of price differences between the two levels of trade in the exporter's domestic market, for example sales of like goods by other vendors or sales of the same general category of goods by the exporter. For this method to be used it is important that <u>a clear pattern</u> 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.

# <u>ANSWER:</u> This question is not applicable, as the price of GUC is not varied by the reason of level of trade.

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.

Provide the applicable interest rate over <u>each</u> month of the investigation period.

If your accounts receivable shows that the average number of collection days differs from the payment terms shown in the sales listing, and if domestic prices are influenced by this longer or shorter period, calculate the average number of collection days.

Where there is no fixed credit period agreed at the time of sale the period of credit is determined on the facts available. For example, where payment is made using an open account system,<sup>1</sup> 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.
- 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:

<sup>&</sup>lt;sup>1</sup> 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.

# <u>ANSWER:</u> Asiazone did not incur any credit cost for its sales of GUC in domestic market during the investigation period because the domestic customers were required to make payment in full before shipment of the GUC.

#### 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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any transportation cost associated with its domestic sales of the GUC during the investigation period.

#### 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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any handling, loading or ancillary expenses associated with its domestic sales of the GUC during the investigation period.

#### 7. Packing

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

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any packing cost associated with its domestic sales of the GUC during the investigation period.

#### 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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any commission associated with its domestic sales of the GUC during the investigation period.

#### 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.

# <u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any expenses on warranty, guarantee or after sale services associated with its domestic sales of the GUC during the investigation period.

#### 10. Other factors

There may be other factors for which an adjustment is required if the costs affect price comparability – these are identified in the column headed "**Other factors**". List the factors and show how each has been quantified in per unit terms. For example:

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

<u>ANSWER:</u> This question is not applicable, as Asiazone did not incur any other expenses associated with its domestic sales of the GUC during the investigation period.

#### 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.

<u>ANSWER:</u> This question is not applicable, as Asiazone has not made any adjustment on its sales.

### SECTION F - EXPORT SALES TO COUNTRIES OTHER THAN AUSTRALIA

Your 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 Complete the spreadsheet entitled '**Third country sales**' within the Galvanised Steel Questionnaire – TAIWAN – accompanying spreadsheet provided alongside this questionnaire.

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

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

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.
Product Type	Identify Galvanised Steel
Quantity	Indicate quantity, in units, exported to the third country over the investigation period.
Unit of quantity	Show unit of quantity e.g. 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 e.g. 60 days=60 etc
Shipment terms	Typical shipment terms to customers in the third country e.g. CIF, FOB, ex-factory, DDP etc.

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

# <u>ANSWER:</u> Please see Exhibit 17 for the spreadsheet entitled "Third Country" for Yieh Phui.

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

### ANSWER: There is no difference in sales to third countries.

# SECTION G - COSTING INFORMATION AND CONSTRUCTED VALUE

As Asiazone is a trader rather than manufacturer of the GUC, we have omitted this section.

### SECTION H – EXPORTER/PRODUCER'S DECLARATION

I hereby declare that **Asiazone Co., Limited** did, during the investigation period export the GUC and have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

Name : Lin-Maw Wu

" (h-

Signature:

Position in Company: Chairman

Date: October 29, 2012

### **SECTION I - CHECKLIST**

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

Section	Please tick if you have responded to all questions
Section A – general information	
Section B – export price	
Section C – like goods	
Section D – domestic price	
Section E – fair comparison	
Section F – exports to third countries	Ø
Section G – costing information	
Section H – declaration	

Electronic Data	Please tick if you have provided spreadsheet
INCOME STATEMENT	
TURNOVER – sales summary	$\mathbf{\nabla}$
AUSTRALIAN SALES – list of sales to	N
Australia	<b>≥</b>
DOMESTIC SALES – list of all	<u>N</u>
domestic sales of like goods	Þ
THIRD COUNTRY – third country	N
sales	Ð
<b>PRODUCTION</b> – production figures	
DOMESTIC COSTS – costs of goods	
sold domestically	
AUSTRALIAN COSTS – costs of	
goods sold to Australia	

#### Asiazone Co., Limited List of Exhibits

- 1. Asiazone's affiliates
- 2. E United Group brochure
- 3. Internal organization chart
- 4. Asiazone's transactions with affiliates during the investigation period
- 5. Chart of accounts
- 6. Annual audited financial statements of 2010
- 7. Annual audited financial statements of 2011
- 8. Internal monthly financial statements from July 2011 to June 2012
- 9. Income statement
- 10. Turnover
- 11. Australian customers
- 12. Australian Sales
- 13. Sales documents for sales to Australia
- 14. Like goods
- 15. Domestic sales
- 16. Sample domestic sales documents
- **17. Third Country Sales**

# Exhibit 1

#### Asiazone's affiliates

#	Company	Company Incorpo	Country of Yieh Phui's oration/Establis Direct hment Shareholding	Yieh Phui's Direct and Indirect Shareholding	Affiliation a	ь	с	Board Members/Manager (Chinese)	Board Members/Manager (English)	Representative	Representative	Controlled by Mr. Lin or his family members	Business Operations	Involved in the Production/sales of the Goods Under Consideartion during the Investigation Period?
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# Exhibit 2

## PUBLIC RECORD 義联集團









才能展出耀眼的光輝 積極的向前遇進 才能當到出美的展實 創新、成長、責任、永續 是我們還一的原則 一步一個的專



創新 Innovation 成長 Growth 責任 Responsibility 永續 Continuity

S melting and polishing produces glaring shine. .lescritice steps abread promise in the fraitful results. Innovation, growth, responsibility and continuity are our guiding posts. Commitment to the best is our only insistence.

Step by step forward;

<ul> <li>泛斎股份有限公司 13 Eliter International Corp.</li> <li>義大開發股份有限公司 15 E-DA Development Corp.</li> <li>生育市車市 Manufacturing</li> <li>爆炸企業股份有限公司 17 Yieh Phui Enterprise Co., Ltd.</li> <li>常熟啓揚新興建材有限公司 20 Changshu Chief Leading Edge Construction Materials Co., Ltd.</li> </ul>				
<ul> <li>集團大事院</li> <li>4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.</li></ul>		創辦人的話	01	Words From The Founder
四大事案體 95 The Four Business Sectors 教育事業體 Fducation 基分大學 97 I-Shou University 五大國際中小學 93 I-Shou University 五大國際中小學 93 I-Shou International School 200 110 Hereit Constructional School 200 110 Hereit Constructional School 200 110 Hereit Constructional Corp. 五大國發脫的有限公司 73 Eliter International Corp. 五大國發脫的有限公司 75 E-DA Development Corp. 生育 11 F F Paul Enterprise Co., Ltd. 常熟透揚漸興建材有限公司 20 Changshu Chief Leading Edge Construction Materials Co., Ltd. 標題(中國)科技材料有限公司 21 Yieh Phul (China) Technomaterial Comp. 構要全葉股仍有限公司 23 Yieh United Steel Corp. 構要重要股份有限公司 25 Yieh Hsing Enterprise Co., Ltd. 構要算量股份有限公司 25 Yieh Hsing Enterprise Co., Ltd.		集團組織	02	Group's Organization
教育事業         Education           最守大學         97         I-Shou University           五大國際中小學         93         I-Shou University           五大國際中小學         93         I-Shou International School           建合         11         E-Da Hospital           進產         24 K 間 相 星 節         Real Estate and Leisure Business           送商股份有限公司         13         Eliter International Corp.           黃大開發股份有限公司         15         E-DA Development Corp.           生産         11         F-DA Development Corp.           生産         11         F-DA Development Corp.           生産         17         Yieh Phul Enterprise Co., Ltd.           常熟透揚編新興建材有限公司         20         Changshu Chief Leading Edge Construction Materials Co., Ltd.           爆整/中國、科技材料有限公司         21         Yieh Phul (China) Technomaterial of #W編编鐵股份有限公司         23           操用企業股份有限公司         23         Yieh United Steel Corp.         4           爆力業要股份有限公司         25         Yieh Hsing Enterprise Co., Ltd.           爆力業要股份有限公司         25         Yieh Hsing Enterprise Co., Ltd.		集團大事紀	03	Group's History
<ul> <li>経守大學 07 I-Shou University</li> <li>養大國際中小學 09 I-Shou University</li> <li>養大國際中小學 09 I-Shou International School</li> <li>基本國際中小學 09 I-Shou International School</li> <li>基本國際 11 E-Da Hospital</li> <li>地產及休閒有重節 Real Estate and Leisure Business</li> <li>送斎股份有限公司 13 Eliter International Corp.</li> <li>養太開發股份有限公司 15 E-DA Development Corp.</li> <li>生產 1 = 1 = 1 </li> <li>場着企業股份有限公司 17 Yieh Phul Enterprise Co., Ltd.</li> <li>常熟透揚新興建材有限公司 20 Changshu Chief Leading Edge Construction Materials Co., Ltd.</li> <li>媒瓣(中國)科技材料有限公司 21 Yieh Phul (China) Technomaterial O</li> <li>媒際調鐵股份有限公司 23 Yieh United Steel Corp.</li> <li>媒具企業股份有限公司 25 Yieh Hsing Enterprise Co., Ltd.</li> <li>媒式實業股份有限公司 27 Yieh Mau Corp.</li> </ul>		四大事業體	05	The Four Business Sectors
		教育事業體		Education
名人留於         Medical Services & Health Core           義大醫院         11         E-Da Hospital           地產及休閒有萬餘         Real Estate and Leisure Busines           这斎殿仍有限公司         13         Eliter international Corp.           義大開發股仍有限公司         15         E-DA Development Corp.           生育有重要         Manufacturing           爆着企業股份有限公司         17         Yieh Phui Enterprise Co., Ltd.           常熟咨揚新興建材有限公司         20         Changshu Chief Leading Edge Construction Materials Co., Ltd.           爆炸(中國)科技材料有限公司         21         Yieh Phui (China) Technomaterial O 煉腸續鐵股仍有限公司         23           煤力業販売行限公司         25         Yieh Hsing Enterprise Co., Ltd.           煤力業販売税行限公司         25         Yieh Hsing Enterprise Co., Ltd.           煤力業販売税行限公司         25         Yieh Hsing Enterprise Co., Ltd.           煤力業販売仍有限公司         27         Yieh Mau Corp.		義守大學	97	I-Shou University
		義大國際中小學	09	I-Shou International School
<ul> <li>地產及休閒和星號</li> <li>Real Estate and Leisure Business</li> <li>这產股份有限公司</li> <li>43</li> <li>Eliter International Corp.</li> <li>養大閒發股份有限公司</li> <li>45</li> <li>E-DA Development Corp.</li> <li>生產和</li> <li>Manufacturing</li> <li>爆炸企業股份有限公司</li> <li>47</li> <li>Yieh Phui Enterprise Co., Ltd.</li> <li>常熟香揚新興建材有限公司</li> <li>20</li> <li>Changshu Chief Leading Edge Construction Materials Co., Ltd.</li> <li>煤幣(中限)科技材料有限公司</li> <li>21</li> <li>Yieh Phui (China) Technomaterial O</li> <li>煤幣30%股份有限公司</li> <li>23</li> <li>Yieh United Steel Corp.</li> <li>煤更企業股份有限公司</li> <li>25</li> <li>Yieh Hsing Enterprise Co., Ltd.</li> </ul>		经收益支持		Medical Services & Health Core
这商股份有限公司 13 Eliter International Corp. 義大開發股份有限公司 15 E-DA Development Corp. 生育 # 第 爆費企業股份有限公司 17 Yieh Phui Enterprise Co., Ltd. 常熟香揚新興建材有限公司 20 Changshu Chief Leading Edge Construction Materials Co., Ltd. 爆炸(中限)科技材料有限公司 21 Yieh Phui (China) Technomaterial O 爆勵鎮酸份有限公司 23 Yieh United Steel Corp. 爆興企業股份有限公司 25 Yieh Hsing Enterprise Co., Ltd. 爆力費業股份有限公司 27 Yieh Mau Corp.		義大醫院	11	E-Da Hospital
<ul> <li>義大開發股份有限公司 15 E-DA Development Corp.</li> <li>生育工作</li> <li>州の山石Cturing</li> <li>爆炸企業股份有限公司 17 Yieh Phui Enterprise Co., Ltd.</li> <li>常熟香揚新興建材有限公司 20 Changshu Chief Leading Edge Construction Materials Co., Ltd.</li> <li>煤幣(中國)科技材料有限公司 21 Yieh Phui (China) Technomaterial O</li> <li>煤幣編鐵股份有限公司 23 Yieh United Steel Corp.</li> <li>煤厚企業股份有限公司 25 Yieh Hsing Enterprise Co., Ltd.</li> <li>煤汽費業股份有限公司 27 Yieh Mau Corp.</li> </ul>		地產及休閒事業量		Real Estate and Leisure Business
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<ul> <li>爆磨企業股份有限公司 17 Yieh Phui Enterprise Co., Ltd.</li> <li>常熟咨撮新興建材有限公司 20 Changshu Chief Leading Edge Construction Materials Co., Ltd.</li> <li>煤攤(中國)科技材料有限公司 21 Yieh Phui (China) Technomaterial 0</li> <li>煤懸鋼鐵股份有限公司 23 Yieh United Steel Corp.</li> <li>煤更企業股份有限公司 25 Yieh Hsing Enterprise Co., Ltd.</li> <li>煤克實業股份有限公司 27 Yieh Mau Corp.</li> </ul>		義大開發股份有限公司	15	E-DA Development Corp.
常熟啓御新興建材有限公司 20 Changshu Chief Leading Edge Construction Materials Co., Ltd. 煤輝(中限)科技材料有限公司 21 Yieh Phul (China) Technomaterial ( 煤糠鋼鐵酸份有限公司 23 Yieh United Steel Corp. 煤興企業酸份有限公司 25 Yieh Hsing Enterprise Co., Ltd. 煤茂寶集股份有限公司 27 Yieh Mau Corp.		生産事業情		Manufacturing
Construction Materials Co., Ltd. 樟麵(中國)科技材料有限公司 21 Yieh Phui (China) Technomaterial ( 樟瓣編鍵份有限公司 23 Yieh United Steel Corp. 樟興企業股份有限公司 25 Yieh Hsing Enterprise Co., Ltd. 標次書業股份有限公司 27 Yieh Mau Corp.		嬋輝企果股份有限公司	17	Yieh Phui Enterprise Co., Ltd.
樟類(中國)科技材料有限公司 21 Yieh Phul (China) Technomaterial ( 樟聯編進股份有限公司 23 Yieh United Steel Corp. 樟興企業股份有限公司 25 Yieh Hsing Enterprise Co., Ltd. 樟克業股份有限公司 27 Yieh Mau Corp.	幣	熟啓揚新興建材有限公司	20	Changshu Chief Leading Edge
爆聯鋼鐵股份有限公司 23 Yieh United Steel Corp. 爆興企業股份有限公司 25 Yieh Hsing Enterprise Co., Ltd. 爆戏習業股份有限公司 27 Yieh Mau Corp.				Construction Materials Co., Ltd.
■ 標興企業酸份有限公司 25 Yieh Hsing Enterprise Co., Ltd. 構成習業股份有限公司 27 Yieh Mau Corp.	焊索	前(中國)科技材料有限公司	21	Yieh Phui (China) Technomaterial Co., Ltd.
爆龙寶葉股份有限公司 27 Yieh Mau Corp.		嫌聯鋼鐵股份有限公司	23	Yieh United Steel Corp.
		燁興企業股份有限公司	25	Yieh Hsing Enterprise Co., Ltd.
操衆(廣州)不銹鋼有限公司 29 Lian Zhong Stainless Steel Corp.	Nary	爆茂實業股份有限公司	27	Yieh Mau Corp.
	1 2 1	#衆(廣州)不銹鋼有限公司	29	Lian Zhong Stainless Steel Corp.
未來展望 31 Prospects	NP	未來展望	31	Prospects

#### PUBLIC RECORD TED GROUP

4 年期後回載為一先不差点大卓超的歷程。義於集團自民 個57年間即興內可認今,已從關聯基礎產業發展至對有 案、並加且醫驗局所、緩积了公司。「和之就社 會」的理念。期間重整經戰平,但仍果持著「創新」成長、 責任,完職」經營目等,或提訊戰,「好蹤出解新的格局。 纏著截大國際中學與武智院的建構完成,義於集團已遇 可以人一生的兩個體系。

- · 幼有所教:中小學、大學能坦養社會所需的人才
- 批有所用:生產事業能提供安身立命的工作環境
- ·老有所養:醫院與護理之家能安享平安健康的統年

滿懷感感的心,義我集團仍一本創業的初表,能不斷的投資 與建設台灣,以這種屬大式來為主輪,回饋鄉親長期以來對 本奠團的嚴優興受持。

截联集團幅心想·也願取伴您一生;

In parts of business development is a journey of the continuous pursuit of excellence. Since the establishment of Yieh Haing Enformate in1578, E. Umited Group has expanded from its care business, the steel industry, to the advaction sector as well as its medical care shorteen. This demonstrates the Group's main goal of contributing to society.

saving overcome several doltacity in the park the § Linitian Globy remains able to meanitor in Sautianity doltacity of universition, growth, responsibility and continuity folloy, the growth growth of two challenges and make an introventer becautely and the several for young and off meanitment simole and FDA Hospital. United Group has committed to provide a file-time territor for young and old **Balaktion**; Conservative fully young and old **Balaktion**; Conservative file policy.

Employment: Provide employment and career developmint opportunities for talented individuals in its manufacturing business.

Care for the elderly: Ensure a pleasant and healthy living conditions for the elderly in its Hospital & Nursing Home.

Since incorporation, the E United Group has shown commutuus dedication toward its insention to keep investing in and improving Talwan. Furthermore, the Group is committed towards providing superior benefits to the

PUBLIC RECOGAR Dand will be your life-time

創入話 Words From The Founder 辦的







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	1978 7月 數立輝興企業股份利限公司。	
See V	PUBLIC RE	2001 1月 大陽 (紫陽依場科核材料有限公司) 正式載土
-	1985 12月 数前部核准股立(高磁工學院)(校址位	12月 副衆一超工程單行奠務與種。
	防高端縣大樹鄉數督山・	2003 3月 爆爆併戰爆戰團嬰及泡軋廠 (
-	1986 3月 原瘤商企業股份有限公司更名務標賃企業	3月 集團更名為「最影集團」…
₹ 團	股份有限公司。	2004 1月 常熟秋地公司投稿基礎開工。
	6月 爛躍第一期建慶工程開始施工~	1月 「截大國際中小學」 核准立案。
大事	1988 3月 環及實業股份有限公司設立。	3月 義大醫院取得國章統照總床顧共402床-
1.2	10月 谭興股票公開發行正式上市。	科別 / 18科設置:一般急性病床250床 ·
紀	12月 標聯鋼鐵股份有限公司成立。	特殊病床152床。
	1989 11月 際統鋼鐵股份有限公司成立。	4月 義大醫院正式營運
9	1990 1月 厚環第一座冷軌機試単生產。 5日 (高雄工學院)泰教育包核准备近79注意	4月 高雄縣政府核准最大國際中小學開始招生。
3'	5月 「希緒上学校」学校育ら校准学出74年度 大学動合把生。	8月 橫大斷統通過巡域数學斷統藝乙類数學驗院許
00	(月 環境第一級股法線試測生產。)	置-
Group's	3月 博爾第一後達顧靖道線試車生產	10月 泛着着生标、商店街、生態團級、SPA會加及
5	1991 5月 煤庫第一條連續熱浸滤許錄試學生產。	景歌巍巍等工程動工。
	(1月 爆調不誘調線材羅試單生產。	12月 常島欣瑞公司酸洗線及第一座活軋機試集生產。
Histor	12月 聯続興趣股份有限公司更名為「聯輯事工	12月 観楽遠編活乳酸洗取正式投產。
SI	股份利暇公司」。	2005 1月 養大醫院總際放床數共1021床。
6	1992 1月 「爆躍集團」 成立 ·	2月 联步援纲极端的舆道。
3	1994 7月 慈思解沉向衛生署申請設立(一般800床-	3月 常熟秋瑞公司第一條連續總原線及第一條運續
-	特殊127床、精神科20床、欄性復發400床)	
	1995 1月 厚璜股票上市案把台牌遗券交易所股份有	4月 联亲韩弘凤火箭洗缐投查。
	限公司審校通道。	7月 衛生署校定義大醫院為醫囊及肝囊摘頭,移植
	5月 爆發熱氣嚴及泡氣感發始生產。	手術之醫院。
	5月 博發烧碳最一號電爐、轉爐、真空積烧爐	9月 經濟紀板准爆闢與勘關重工合併案 -
	及周調経連覇機関始生產。	11局 國大國總股份有限公司股立-
	1995 4月 爆發達國藏小網歷速醫療開始生產。	2006 3 所 義大規發(義大世界廣場)開始及主題樂園動
	1997 8月 教育影校准高雄工學院改制為「異豆大學」	
~~	11月 揮興屏南不銹鋼管醫試車完成,投入生產	6月 联步纳礼服势机清机纷投罪。
10/01	行列。	10月 衛生署核准新增急性一般病床100床,急性一
(19)	1998 10月 山海觀建設股份列限公司設立。	般病尿趣床數900床。
1 - M	2000 2月 集團更名為「觀點集團」。	10月 常熟获瑞科技材料有很公司更名為
	2000 7月 衛生署同意慈悲醫院更名為「財團法人數	爆鑽(中醫)科技材料有限公司 <
Y E Y	大智院」・	12月 義大醫院成功完成首例肝臓、腎臓移植。
	9月山南觀建設股份有限公司名稱變更為泛重	2007 2月 联家课票最投程;
	股份利限公司。	
A	9月 衛生署正式核發費大醫院建院許可(急性一	酒(つ碗中酒。
100	PUBLIC®RE	
-		10月 超南臺聯綱議責任有限公司舉行委基範主大商。
	動工网上。 (2月 大陸聯衆(廣州)不誘調利限公司核准設立+	
103 04	14月 人民國家自動的介绍國際以生物國的設定的保護設计+	11/2 總八國的國際八國國旗一百萬匈國附四八國國
		A

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July	1978	Yieh Hsing Enterprise Co., Ltd was established.	Dec	2002	LISCO began its Stage One construction.
		The commissioning of Yieh Hsing's No.1 Pipe and Tube Mill.			Yieh Phui took over Yieh Hsing's Steel Pipes and Cold
Dec	1985	Ministry of Education approved the establishment of			Rolling operation.
		"Kaohsiung Polytechnic Institute", located in Ta-Hsu Heinog.	Har.	2003	The group ware fighting renamed as "E United Group".
		Kaohsiung Polytechnic Institute, Josephin Ta Hau Hang, Kaohsiung County.	R	2004	Chargshu Sins Le din, Technomaterial Co., Ltd began its
Mar,	1986	Kuo Chiao Enterprise Co., Ltd. was renamed as Tien Phui	1.11	- '	construction
		Enterprise Co., Ltd.,	Jart	2004	i-Shou International School was approved for its
June	1986	Yieh Phui began its Stage One construction.			establishment.
Mar,	1988	Yieh Mau Corporation was incorporated.	Mar	2004	E-Da Hospital was granted the operation license, with a
Qct.	1988	Yieft Hsing had its common stock listed on Taiwan Stock.			total of 402 beds, including 250 acute & general beds and
		Exchange.			152 special beds in 18 medical departments.
		Yieh United Steel Corporation (YUSCO) was established	A.W	2014	E-DA Hospital officially began its operation.
		Lien Tong Steel Co., Ltd. was incorporated.			-Shou International School was approved by Kaohsiung
		The commissioning of Yieh Phui's first Cold Rolling Mill.	in the		County Government to begin enrolling students.
May	1990	Kaohsiung Polytechnic Institute was approved by Ministry	Aur	2004	E-Da Hospital was gualified as an Educational Hospital.
		of Education to enroll students via the National University			Eliter International Corp. began its construction on projects
		Entrance Exam Program.	ur.		such as "Silver Village," "Shopping Districts," "Dream
		The commissioning of Yieh Phua's first Pickling line.			Empire, "SPA Resort," and "Panoramic Restaurant," etc.
Dec.	1990	The commissioning of Yieh Phui's first Continuous	Der	2005	The commissioning of Pickling line and the first Cold
-		Pre-painting line.	ues.	2404	Rolling Mill in Changshu Sing Leading Technomaterial Co.
May	1991	The commissioning of Yieh Phui's first Continuous Hot-dip			Itd. China
1		Galvanizing line.	Der	1004	The commissioning of LISCO's White Rolling Annealing and
NOV.	1991	The commissioning of Yielt Hsing's Stainless Steel Wire &	Dec	20124	
100	-	Rod plant.	Sec.	-	Pickling (WRAP) line. The No. of opening beds in E-Da Hospital was totaled 1021.
Der.	1991	Lien Tong Steel Co., Ltd was renamed as Lien Kang Heavy Industrial Co., Ltd.			LISCO began its steel making plant construction.
1000		The Yich Loong Group was established.			
		Application was submitted to Department of Health for	Mar.	2005	The commissioning of the first Continuous Pre-painting
Yest	1934	establishing Chi-An Hospital (800 acute general beds, 127			line and Continuous Hot dip Galvanizing line in Changshu
		special beds, 20 psychiatry beds and 400 rehabilitation			Sino Leading Technomaterial Co., Ltd., China.
		beds).	Apr.	2005	The commissioning of LISCO's Hot Rolling Anneling and
i.i.w	1005	Viet Phul was approved for listing of common stocks by	-		Pickling Line.
- spans	1942	the Taiwan Stock Exchange Corporation.	may .	2005	E-Da Hospital became qualified kidney .cadaver liver and
Max	1005	YUSCD had its Hot Rolling Mill and Cold Rolling Mill begin			living-donor liver extirpation and transplantation hospital
may	1 and	production.			officially approved by Department Of Health.
Sen	1095	YUSCO had its first Electric Arc Furnace, Converter, Vacuum	Sep.	2005	Ministry of Economic Affairs approved the merger of Yieh
246.		Oxygen Decarburization Facility and Slab Continuous	1		Phui and Lien Kang Heavy Industrial Co.,Ltd.
		Caster in Steel Making plant begin production			E-Da Development Corp. was incorporated.
Apr.	1995	YUSCO had its Billet Continuous Caster in Continuous	Mar.	2005	E-Da Development Corp. began its construction on projects.
		Casting Plant begin production.			such as "E-Da World Plaza" and "E-Da Theme Park."
Aug	1997	Ministry of Education approved "Kaohslung Polytechnic			LISCO had its Hot Rolling Mill begin production.
		Institute" to be renamed as I-Shou University.	Oct	2006	E-Da Hospital increased one hundred acute beds officially
Nov.	1997	Yieh Hsing had its Stainless Steel Welded Pipe plant in Ping-		-	The totality of acute beds was nine hundred beds.
		Tung begin production .	Det	2006	Sino Leading Technomaterial Co., Ltd. was renamed as Yieh
Oct.	1998	The establishment of Formosa Construction Corp.			Phui (China) Technomaterial Co., Ltd.
Feb.	2000	The group was officially renamed as "Yieh United Group"	Dec.	2006	E-Da Hospital completed a liver transplantation and kidney
July	2000	Chi-An Hospital was approved by Department of Health to			transplantations successfully. That was the first instances of
		be renamed as E-DA Hospital.		-	E Da Hospital. The hospital transplanted a liver and two
Sep.	2000	Formosa Construction Corp. was officially renamed as Eliter			kidneys separately to three patients.
		International Corp.			LISCO had its steel making plant brgin production.
Sep	2000	Department of Health officially approved the construction	July .	2007	E-Da Hospital had the honor to receive an Outstanding
		of E-Da Hospital (500 acute general beds, 500 nursing			Award of 2007 Excellent Award for Energy Economizing
		home beds).		_	awarded by Ministry of Economic Altans
Apr.	2001	Changshu Sino Chief Lealing Idge Connection I fice al Co., Ltd. (China) began its construction	50	2007	Deputy of Share that in I-Shout Tenuis and Schuld was
		The construction of LISCO was approved.			Guang Lian Steel (VIETNAM) Co., Ltd. began III. Construct Dirt.
		E-DA Hospital began its construction.	Nov.	2007	E.Oa Hospital had the first case of Humanitesan Beactur
North.	2002	Changshu Sino Leading Technomaterial Co., Ltd. (China)		1	Aption
		began its construction.		1	and and the second s
				100	a second and the second s

義大國際中小學

- · 醫療事業體

   新大醫院
- 地產及休閒事業體
   泛喬公司
   厳大願發
- 生產事業體 價積企業
  - 爆鑽(中國)科技材料(大陸)
  - •常熟啓揚新興建材(大陸)

#### 博聯鋼鐵

揮茂貫業

### Education: I-Shou University I-Shou International School

Medical Services and Health Care:

E-Da Hospital

 Real Estate and Leisure Business: Eliter International Corp.

E-Da Development Corp.

#### Manufacturing:

- Yieh Phui Enterprise Co., Ltd.
- Yieh Phui (China) Technomaterial Co., Ltd.
- Changshu Chief Leading Edge Construction Materials Co., Ltd.

Yieh United Steel Corp.

Lian Zhong Stainless Steel Corp.

#### **PUBLIC RECORD**

Medical Services and Health Care

儲滑事業體

教育事業體

Education



建構完成從幼稚園、小學、中學、大學 研究所的完整教育體系,是義联集團教育文 化事業體的目標關係

F United Group's vision and goal for its education sector is to endorse a fullyintegrated educational system ranging from kindergarten, elementary school, university to graduate school.

總總考業係義詳集業的核心事業。 碳化各值產品的價值,提供交戶票 好的昵称,精緻街局全球,建構更 影言的發展體系,創造時间優勢。 是生產事業號的目標簡易。 Steel industry is the core business of E United Group, Adding value to our products, providing even better customer services, actively building a global network, constructing a solid operation and creating competitive advantages

ate the vision and goal of the manufacturing sector.

義联集

要大醫院的建設理念就是要給社會 大衆暴好的五星級股旗、五向級股 務,實現創辦人同體大衆的心願。 The founding principles of E-Da Hospital is to provide patients with

five star service, which fulfills Mr. Lin's wishes to pay back to the community.

Real Estate and Leisure Business

#### 地產及休閒事業劑

掌握時代課題,有效運用資源,創造開設價值,成為 形象的標竿企業,以前識的視野,快宏的腳續,劃造 具觀光、人文、休閒的運算生活環境,成為她產及休 图事業的標準。

With a forward-looking vision and all-embracing mind, a high-quality life environment encompassing tourist attractions, humanistic features and recreational facilities is created. It will become a landmark for the real estate and leisure business industry.

## M 読む 存日 BLIC RECORD



約28日期:	中華民國75年,原名高雄工學院,民國86年更名為義守大學
師寶:	博士師賣佔總師賣人數的87%
設立院學A所:	至民國97年共有理工、電機資訊、管理、語文暨傳播、醫學等五個學院。
	包括31個學系整一個管理學院學士班、17個碩士班、7個博士班及10個
	碩士在職進修專班、13個進修學士班與6個二年制在職專班。
带生人数:	超過15000人
校地面積:	校本部20.59公頃,燕巢分部:8.19公頃
Date of Establishment :	I-Shou University (ISU), formerly known as Kaohsiung Polytechnic Institute
	(KPI), was first founded in 1986, and has renamed to its current name since 1997.
Faculty :	87% of the faculty holds doctorate degree at ISU
Colleges :	Electrical Engineering & Information Science, Science & Engineering,
	Language and Communication, Management and Medicine
Programs :	31 undergraduate programs plus one join program, 17 master programs, 7
	doctoral programs, 13 continuing education programs, 6 two-year vocational
	programs and 10 executive master programs
Student enrollment :	over 15,000
Campus Area:	Main Campus 20.59 hectares, Yan-Chiao Campus: 8.19 hectares



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立醫學來為目標外,並將朝向關際知名的綜合大學發展而努力。



With more than 15,000 students in 5 colleges, ISU is the most complete and the largest private university in southern Taiwan. Established in 1986, years of



endeavors allow ISU to offer high-quality, student-focused, practical higher education to students worldwide. The school boasts a stellar cast of teaching professionals, who have both academic and on-the-job credentials. 87% of the faculty members have doctorate degrees, the most in any private university in Taiwan. ISU curriculum is designed to integrate local area's unge features so that our students are trained to meet the exact needs of local



industry. School programs are continuously improved through vigorous globalization strategies.



約12日期:	2004年5月開始招生(南台灣第一所國際雙語中小學)
位置:	高雄縣大樹鄉觀音山,緊聽義守大學
校比面積:	38,000平方公尺
招生规模:	依美式學制年級1-10年級,每年級共4班
學校特色:	绿意盎然的環境/带街性的领域/藝術與人文的陶冶/
	獨立自主的學習/積極進取的求知態度/資源豐富的圖資世界/
	互助共荣的网络關係/充满活力歐樂的校園/具前瞻位的教學目標
e of establishment :	May, 2004
	The first international school offering bilingual program in
	Southern Taiwan.
Type of school:	Boarding and day school
Location :	Adjacent to I-Shou University, on Mount Guan-yin in Kaohsiung Con
Lot Area :	38,000-square meters
Grade :	1~10
Class :	Four classes per grade level
alty : Lower school :	We are a candidate school implementing the PYP (Primary Yea
	Program) of International Baccalaureate Organization (IBO)
Upper school :	We offer two distinctive programs aiming for the students to enter national universities and foreign universities



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義大國際中小學教育 本直和同理也,學校的基UBLACK中RECORD<sup>4</sup>。我们堅信線展現實 。藉由和局定流後每位帶主具領冒險條件,直能進一步發展成為外身帶習者。我们努力提供身心均衡 的課程,導品於學生自發性探索。最终目標為教育我們的學生使其僅符 反思、強世紀是社會和中,以會起社會。



growing mind a love for learning. We firmly believe in promoting honesty, integrity and compassion. The foundation of the school is based on making every effort to instill caring, open-minded and principled characteristics in each student. By encouraging communication, each student is prepared to take risks and further develop into a lifelong learner. We strive to provide a well-balanced program that

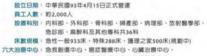
International School fosters in each

PUBLICERECOR



into reflective people that want a better and more peaceful world.





器官移植中心、重建治療中心、神經醫學中心

Date of Establishment :	April, 2004
Number of Employees :	2,000
Departments :	Internal Medicine, Surgery, Orthopedic Surgery, Gynecology
	and Obstetrics, Pathology, Radiology, Emergency Dept.,
	Anesthesiology and Special Subjects, totally, 36 subjects.
Opening Beds :	Acute Beds 933, Special Beds 288, Home Care Center500 (In Plan)
Six Centers of Therapy :	Trauma & Emergency Center, Cancer Center, Cardiology and
	Cardiac Surgery Center, Transplantation Center, Center of
	Reconstructive and Aesthetic Surgery, Neurology Medicine
	Center



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環境空間踏如五星級型日的空間營造。戸外名家舗選・室内積琴演奏・入口的水質模要・其特有的藝 都與人文和思・課母一 戸村 男田 (Car CORD)\*\*・元編明等者・貴 大物不在運転数額級・10月日 - 10月日 - 10月日

截大腿院腿獲科別完整。醫師禅容來自各大醫學中心。最大腦院的醫療患 構項目包括營道量達年後、編即營換術、質神經直量達。內沒機減重手術 。 美斤定記機、以為了手体、纖膜酸當對手術、腦酸医氣,心學管手術等。 載大醫院擁有許多先進的攝器設備,包括正子這影攝影儀(PET/CT Scan) 等。經代與電品酒包需要股點。 (443)電腦醫療證影 (64 Silces CT Scan) 等。經代與電品酒包需要股點。





 ${\cal G}$ -Da Hospital is comparable to a five star hotel: there are masters' sculptures, paintings, the lingering sound of the piano, and the water show of Life fountain at the entrance. Walking into E-Da Hospital, you feel an atmosphere of unique art and humanity. Instead of the pungent oddr of disinfectant, the aroma of coffee spreads all over the hospital. It completely changes the image of the traditional hospital because E-Da



hospital is a place not only for medical treatment, but also for relaxation.

E-Da Hospital offers a wide variety of medical services. Most of the attending doctors come from major medical centers in Taiwan and are able to provide quality care in their medical specialities. We specialize in Esophageal and Voice Reconstruction, Total Joint Replacement, Treatment of Brachial Piexus injury, Laparoscopic Bariatic Surgery, Treatment of Hyperbidrosis, Gamma knife Radiosurgery, Prostate Laser Surgery, Polysomorgraphy and Cardiac Catheterization Examination with Intervention. We also own the most technologicality advanced





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設立日期:中華民國87年10月 資本額:新台幣23.225億元 資工数:約60人 醫業項目:不動產投資開發、 約21初劃、無謀局和集

Date of Establishment : October, 1998 Capital : NT\$2,3225 billion Number of Employees : 60

Services : Real estate development,

design, planning,

construction, sale and lease



Real Estare

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送着公司思義联集團地產及休閒專業備之核心成員・於1998年成立以來・首先以開發【首大城】為全國 性的綜合開發物國為目標・並受取新看單元聚構開發行気(Playand Unit Development 關欄PUD)去營造 出自然舒適又業員零靜 Prod BLat C 成 R E C O R D 思之城市・又業員採業 與感動的心靈休閒城市。

【 20 大城】本导位於高雄振知名的風景區內·緊節幾守大學與截大國際 中小學之間,是一處與短的人文教育住宅。在整體建築語彙與造型上強調 休閒,大叔採取式及美式拉面風格,婚伝權高減少環境壓迫感,增大機距 確保居住之談私。重視全國之醫體意向,整合建物風俗尚外觀話彙,為地 產而場訂過出與奈非凡與價值不讓的進點傳奇。



Is the core member of the real estate and leisure business sector of the E United Group, Eliter International Corporation was founded in 1998. The primary goal of the corporation is to develop the E-DA city to become a nationwide multifunctional district. The Planned Unit Development (PUD) method is employed to create a relaxed and serene living environment. Ultimately, the E-DA city will grow to be a spiritual resort which is full of academic, art and recreational atmosphere.

Cocating in the renowned scenic resort in Kaohslung County and neighboring the I-Shou Deer Bit in Chou Dear County and the E-DA city villas are born to be classic literary residences. The European and American townhouse styles set up a tone of privacy, lesioure and freedom and make the E-DA city villa precious in its kind.



#### 表大開發股份有限公司 PUBLIC RECORD



設立日期:中華民語82年9月 資本期:新台幣22億元 板心價值:設力商業地產開發:營造生活数樂休期空間 參業四日:休期:始舉、機物、餐飲方飯店商商業並希間發現經發

Date of Establishment : September, 1993 Capital : NTS 2,500million. Core Value : Devoted to commercial real estate development and creating joyful relaxation space of life. Services : Commercial development and operation of recreation, theme park, mall, restaurants and hotel properties.

#### PUBLIC RECORD

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 $\mathcal{C}$  -Da Development Corp. (EDD) is one of the major members of the real estate and leisure business sector under E United Group. EDD provides services of relaxation, amusement, retail, restaurant and hotel.



EDD plays the main role of developing the E-Da City Project in Mt. Guanyin, Kaohsiung County. The total investments of the E-Da City Project are estimated exceed tens of billions N.T. dollars and will be the most completed mass leisure business project in Taiwan. E-Da World Plaza and E-Da Theme Park are the major two projects under-developed by EDD. E-Da World Plaza is the first international scale recreation mail and E-Da Theme Park is the largest indoor theme park in Taiwan. E-Da Royal Motel is the

In the meantime, Skylark Hot Spring Resort Hotel in Pingtong, a BOT project in association with County Government, is under progress by Tian-Yue Hot Spring & Resort International Corp. This hotel project will become the most popular hot spring



設立日期:	1986年3月
資本額:	新台幣139億元
員工人数:	約1,500人
置線:	二條酸洗線、四座冷軋機、四條運輸式熱浸鍍锌線、
	三條運續式烤漆線、九條製管線
主要產品;	酸洗鋼播、冷軋鋼播、熱浸鍍銲/鍍5%鋁絆/鍍55%鋁計
	調捲、彩塗地漆鋼捲、鋼管、鋼構、運搬起重設備
Date of Establishment :	March, 1986
Capital :	NT\$13.9 billion
Number of Employees :	1,500
Production Lines :	2 pickling lines, 4 cold rolling mills,
	4 continuous hot-dip galvanizing lines,
	3 continuous pre-painting lines, 9 pipe-forming line
Main Products :	Pickled Steel Coils, Cold Rolled Steel Coils,
	Hot-Dip Zinc / 5% / 55% Al-Zn Coated & Color Steel
	Sheets, Steel Pipes, Steel Structure, Material
	Handling Equipment

417 18 #

備全葉於1966年設立。目前主要產做設置於機跟國國與原果着面。每年生產鏈評購獲130萬聯。總漆 業務43萬種。為台灣及東南亞地區最大的國地廠品等其面面。也是全世界產量最大的國地廠,同時也 是台灣長大關國發遊廠。與年中國人口。同時在中國人口。 等管理系統認識外,也是中國人口。同時在中國人口。 等管理系統認識外,也是中國人口。同時一個人一個人一個人一個人一個人一個人一個人一個人 等管理系統認識。雖然國內外市場驗爭非常意思。本著以創造利潤,構善求相及贏得信任的經營方 計較國客戶。每年集號的能大幅成長。今後將在回饋社會之理念下,職員 輕低成本及開發高附加價總之產品,成為不確是產量最大亦是效果最高、 品質及認爲最好之或地屬凱索處。

 ${\mathcal B}$  stablished in 1986, Yieh Phu's major production lines operate in its Kaohsiung Works and Pingtung Works. The annual capacity is 1.3 million tons of



galvanized steel coils and 430,000 tons of pre-painted steel coils, which make Yieh Phui the largest specialized producer of coated steel in Southeast Asia, and the world's largest independent hot-dip galvanizer and coil coater. Furthermore, the company is the largest steel pipe manufacturer in Taiwan, capable of producing over 120,000 tons of steel pipes annually. Yieh Phui is not only registered by ISO 9001, ISO 14001 and 0HSAS 18001, but the first company that acquires IECQ QC 08000 HSPM



approval among global steel industries. Since its establishment, Yieh Phui has experienced 15 years of continuous expansion. Regardless of the rigorous competition both in domestic and international markets, Yieh Phui has recorded significant growth in its sales each year. The During the phone of the source o





設立日期	2001年4月
	江蘇省常熟經濟開發區沿江工業區
投資金額(	約3千萬美元
土地服稿;	13萬平方米
員工人數:	約300人
登業項目:	大樓銅構、廠房銅構設計。製造、安裝 各類鋼品之剪数、分條
Date of Establishment :	April, 2001
Location :	Riverside Industrial Park, Changshu Economic Development Zone, Jiangsu, China
Initial investment :	30 Million USD
Lot Area :	130,000 m'
Number of Employees :	300
Main Service :	Steel structure design, manufacturing and assembling for buildings and mills. Coil cutting, shearing and slitting



常務告援新興建材公司是於2001年4月由爆種投資股立,位於江蘇省常務經濟開發部沿 江工業區,投資金額為3千萬美元,主地亟易運13萬平万米,主要妥事大權調構,服房調 構設計、製造及安裂,另外均包括各類順因之獻製,分核等,年產量規模可達30萬順。

G hangshu Chief Leading Edge Construction Materials was invested by Yieh Phui in April 2001. It is located inside the Riverside Industrial Park Changshu Economic Development Zone, Jiangsu Province, China. The total investment has reached USS Diabating in RECORD Disembly of steel structure of buildings and mills. It also provides services for cutting, slitting and shearing of a variety of steel products, with an annual capacity of 300.000 tons.

#### 

專業廠,擁有國內最新式型鋼組立(BH)生產線、全焊道全滲透製程之箱型 柱(BOX)生產線、二次型料加工線及各式CNC泛用加工設備。為提升生產 技術、與日本川崎重工技術合作,於1998年3月通過英國勞

民聯船號會認證,成為 ISO8001:2000名協選 廠商。茶巢廠為運搬機械 製造廠,欄有各式運動 起重設備製作能力,以, 「擎天標AIRSTAR] 忌 牌行資全球,高質系統 ISO8001:2000世SGS 台灣檢驗科技認證合格 ,為目前台灣少數具有 設計能力之最大起運機 恢專業製造廠。

When Phul's Engineering Business Division has two production plants which are located at Luhtzu Township and Yanchao Township respectively. Luhtzu Plant focuses on steel structure production. The technology of fabricating steel structure was developed via the cooperation with Kawasaki Heavy Industries of Japan, which includes the state-ofthe-art type of built-up H-beams and the well welded Box column with the geal of improving fabrication technique. Yanchao Plant has been approved as an ISO 9001:2000 registered firm by Lloyd's since March 1998. It is the largest material handling equipment manufacturer in Taiwan, whose production mainly focuses on design, manufacture and erection of diversified cranes, container cranes, and straddle carriers.

"AIRSTAR" is the world Pousited for mana Patt an ORD quality system is also approved to meet the standards of 150 9001: 2000 by Sus Taiwan





致立日期:	2001年12月
ta 置 :	江蘇省常熟經濟開發區沿江工業區۶維路1號
投資金額:	約2.313億美元
	23第平方米
百工人数:	and the second sec
	一係酸洗線、二座冷机線、二倍達積熱浸銀幹線、
4.4	二條連續銅揚灣落線(第三條熱浸鏡錄線建設中)
****	截洗銅捲、冷軋銅捲、熱浸鏡鋒/鏡5%銘鋒/鏡55%銘鋒銅捲
TATO.	、彩堂建造铜道
Date of Establishment :	December, 2001
Location :	1, Yiehphui Road, Riverside Industrial Park, Changshu
	Economic Development Zone, Jiangsu, People's
	Republic of China
Initial investment :	US \$ 231.3 million
Lot Area :	230.000m
Number of Employees :	900
Production Lines :	1 Pickling Line, 2 Reversing Cold Rolling Mills, 2 Continuous
	Hot-Dip Galvanizing Lines, 2 Continuous Pre-Painting Lines
	(No. 3 Continuous Hot-Dip Galvanizer Line under construction)
Main Products :	Pickled Steel Colls, Cold Rolled Steel Colls, Hot-Dip
	Zinc / 5% / 55% Al-Zn Coated & Color Steel Sheets
	zinc / Sw/ SSw Arzin Coaled & Color Steel Sheets





<sup>揮</sup>項(中国)科技材料 PUUBLEC<sup>1</sup> RECORD<sup>4</sup>林将进柱门及江展省 常熟地港网络医治江工程也**DBL**C<sup>1</sup> RECCORD<sup>4</sup>, 已先後完成一條做 洗練,二房水稅後,一件邊境務沒被評檢,二件邊境朝絕評漆線,並正建設第三條邊境熱源沒做評檢, 全都建成完成,每平行產90萬個之做洗網絡,60萬個之冷氣網絡,90萬個熬沒做評約將,以及評漆 夠後35萬個。



Established in 2001, Yieh Phui(China)Technomaterial is also invested by Yieh Phui. Same as Chief Leading, it is located in the Riverside



Industrial Park Changshu Economic Development Zone, Jiangsu Province, China. The total investment is about US\$231.3 million, and the plant occupies a land area of 230,000 square méters. One pickling line, two cold rolling mills, two continuous hot-dip galvanizing lines and two continuous pre-painted

lines have been commissoned. Currently the third continuous hot-dip galvanizing line is under Construction. Once the construction of the entire plant is completed, its annual capacity is expecte to reach 900,000 tons of pickled steel coils, 600,000 tons of cold relied steel coils, 900,000 tons of hot-die nakanized steel coils, and 300 to the teach steel coils, 900,000 tons of hot-die nakanized steel coils, and





設立日期: 中華民國77年12月
 資本額: 新台幣166.3億元
 資工人数: 約2,100人
 產線: 一資作業不透調整: 含烷酮、熱軋、活軋
 主要產品: 熱軋不透調素及調整、含烷酮、熱軋、活動、
 完惠不透調要素

Date of Establishment : Decembdr, 1988

Capital: NT\$16.63 billion

Number of Employees : 2,100

Production Lines : Integrated manufacturing processes including

steel making, hot rolling and cold rolling

Main Products : Stainless Black HRC, Stainless No.1 HRC,

Stainless CRC

## PUBLIC RECORD



23 24 #



USCO is the one and only integrated stainless steel producer in Taiwan. The company invest over NT\$40 billion. There are currently more than 2,100



employees serving in YUSCO, contributing to a annual capacity of over 1 million tons of steel making, 95,000 tons of hot rolling, and 60,000 tons of cold rolling, YUSCO is proud to be certified with ISO9001 for the quality management, 14001 for the environmental management and OHSAS18001 for the occupational safety and health management, YUSCO is not only a manufacturer of stainless steel, but also a service provider. Since its establishment, it not only works hard to maximize its output, but also strives to provide a customer oriented services, YUSCO's vision is to be a "larger, faster and better"



inter the Build of the Record RD res and higher quality. YUSCO is expected to march forward with recognized overall value and competitive advantages.





設立日期: 中華民國67年7月 資本額: 新台幣73億元 員工人數: 約277人 產號: 机延線、固溶化、酸洗線 主要產品: 各類線材盤元-包括不誘腸、裝鋼、合金鋼、快削鋼 不透腸管之製造及損貨

Date of Establishment : July, 1978

Capital: NT\$7.3 billion

Number of Employees: 277

Production Lines : Rolling Mill, Solution Annealing, Pickling Line

Main Products : Stainless Steel Wire Rod, Carbon Steel Wire Rod,

Free Cutting Steel Wire Rod, Alloy Steel Wire Rod





「準備公司為截於集團的民國67年7月創立之第一家公司,創立初期以報酬、整評酬智為主要產品,民國80年加入同以能材閣、民國66年加入同前能材閣。目前主要產品為各類能材量元,包括不詳購、報調、合金購、快用調,年產能約100.000%,為國內的管理要提為目標,民计超元之股關、供應下該客戶製成合式燃給、螺帽、四日、日本、局國內等管理提為目標,民计超元之股關、供應下該客戶製成合式燃給、螺帽、四日、日本、高國、中國、國家等」、成立之初爆興回以快速回應客戶需求、依違之效。供這及國市場質訊之三代股居客戶,未來亦將秉持證 相同精神運得客戶所需,並需證能持論發展成為總要案、最具幾爭力的 能材專業主重編面。

Y ieh Hsing is the first company of E United Group. Yieh Hsing started as a steel producer in carbon steel tube and pipe. In 1992, Yieh Hsing



commissioned its first SMS wire rod line as well as production and sales of stainless steel wire rod, carbon steel wire rod, free cutting steel wire rod and alloy steel wire rod which made it one of the most professional manufacturers in Talwan, now. Our products are available for various application for downstream customers, such as nut's screw wires, automobile parts.



machine parts hardware and tools etc. In order to meet customers' requirement, Yieh Hsing sets up a complete quality control system. We are also awarded the ISO 9001 certificate. Yieh Hsing established 3Qs in its service policy to ensure customer satisfies the service policy to the service policy to the service in the service policy to the service policy to the service in the service policy to the service policy t





設立日期:	中華民國77年3月
資本額:	新台幣16.2億元
員工人數:	約105人
<b>產線設備</b> :	分條機、整平及氦板機、抛砂研磨機、鏡面研磨機
主要產品。	不誘鋼不同表面之加工生產、鋼鐵貿易及銷售
	集合住宅、辦公室之役資興課、銷售。

Date of Establishment : March, 1988

Capital : NT\$ 1.62 billion

Number of Employees: 105

Production Facilities : Slitting Line/ Leveling and Cut to Length Line/ Grinding And Polishing Line/ Mirror Finishing Product and Service : Steel Products Trading, Production and sales of Stainless Steel, Alloy Steel and specialty Steel.





「僅克賞業初期從事業品之進出口貿易及儘內崩售,扮演集團內貿易消角色。1994年起,轉入製造業 ,生產及銷售不該備,合合調等的貨幣給力,目の供給局額需要要約約,目中貿易及製造業約佔一 半。並於1996年起,最不該低,加出生產,目前是在各方面的產品,並為不該個少需要用一,產品含調酒,差納不 該鐵物將等。2008年起將陸續引進團板數較變量,將成為不該個少需要用之主力出標件。







Y ieh Mau corporation (YM) act as a trading house for all the metal products. In 1994, YM constructed a stainless steel wire rod processing plant to expand business scope to the manufacturing field with an annual sales volume

up to NTD 5 billion level. From 1996, a new plant started to produce high value

add phin the contract of the provider with wide

range of stainless steel in flat in global market.





設立日期:	2001年12月
位置:	廣州經濟技術開發區東區
投資金額	約8億美元
土地面積:	120萬平方米
員工人數:	約2500人
產線:	煉鋼、熱軋、冷軋一貫作業不銹鋼廠
最終產品。	不誘鋼扁鋼胚、不誘鋼鋼板、熱軋不誘鋼黑皮鋼卷、
	熱氣不銹鋼白皮鋼卷和冷氣不銹鋼鋼卷
Date of Establishment :	December, 2001
Location :	Economy and Technology Development Zone, Gungzhou, China
Initial Investment :	800 million USD
Lot Area :	1.2 million #
Number of Employees	2500
Production Lines :	Integrated manufacturing processes including steel making,
	hot rolling and cold rolling
Main Products :	Stainless slab, Stainless plate, Stainless black hot rolled coil,
	Stainless No.1 hot rolled coil, Stainless cold rolled coil



# 29 30.0

證,將以發展為世界頂尖不誘鋼專業製造企業為目標,努力進設具有關際 競爭力的示範性不誘鋼大廠。

HK &

L'izanzhong (Guangzhou) Stainless Steel Corporation (Lisco), designed with steel melting, slab casting, hot rolling, cold rolling, is the first and



largest professional integrated stainless steel manufacturer in the Southern China. Invested by YUSCO, its technology is acknowledged as the most advanced in the world. WRAPL is the first continuous cold rolled annealing pickling line in the world and HAPL is the only line that can process 10 mm-thick coils in Mainland China. From the beginning construction, Lisco adopted the most advanced



facilities for efficient utilization of energy and ecological environmental protection. Lisco has been approved as ISO9001, ISO14001, OHSAS18001, PED,

and Pro-B pet Nore What was with the model of being a model of competitive stainless steel manufacturer.

Manufacturing Manufacturing

> ▲新的創新與成長,是企業系續經營的動力,展望末來,在生產事業關系,除 了繼續增強核心產品之競爭力外,「立足台灣、全球佈局」更是未來重要的營運 方針。在教育體所方面,在現有的基礎上,期許能兼顧人本與科技的教育宗旨, 滿足學生在專業知識的追求,領極與全球知名大學合作,那紛坍養與宏觀的優秀 人才,並以验口醫學院為目標,朝具態際水準之綜合大學發展。

> 在醫療體系,除了持續引進全球頂尖的儀器和設備外,未來將朝醫學中心及高品 質醫療與運發展,並成立六大醫療中心,以仁心與堅實的醫療團隊來服務民象。 在地產及休期5回。積極進行戰魯山大學域聚體開發計畫,創造大高雄地區獨員 風格、休潮、娛樂、購物與人文的觀光地標,以提升向台灣民衆的生活品質。 藏取集團已整起多況不景氣循環的苦驗,也深切體會地有這模精實的營運體所, 不斷的創新與發展,才能讓事業永續經營,以善處企業的責任,樹立企業在社會 中的價值。

#### PUBLIC RECORD

未來展望

Prospects

Educati

Real Estate and Leisure Business

Gonstant innovation and growth is impetus for business continuity. Looking to the future, by securing a foothold in Taiwan, while maintaining a global perspective, is the major operating policy of the manufacturing sector as well as continuing to improve the competitiveness of our core products.

For the education sector, we expect to build on the existing foundation and statisfy students' pursuit of professional knowledge in both the areas of humanities and technology. We will actively seek collaboration with renowned universities throughout the world, in order to provide training across a broad collection of diciplines. Our goal is to establish a medical school in ISU and develop it towards the direction of an international university.

For the medical services and health care sector, apart from introducing state-of-the-art equipment and facilities from all over the world, the hospital expects to develop itself into a well respected research facility and health care center. The company also wishes to establish six therapy centers, each serving the public with a kind hearted and skilled medical teams.

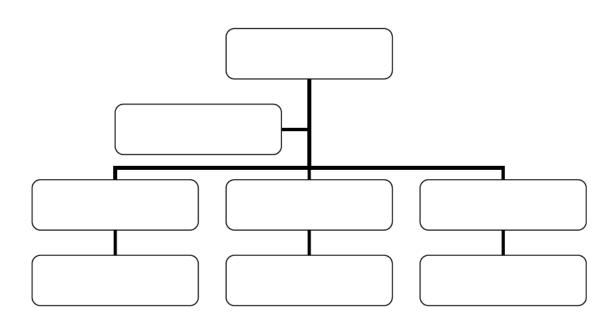
For the real estate and leisure business sector, the main projects currently underway include the E-Da Community at Guan-Yin Mountain. These projects will create a tourist landmark with unique style, recreational, theme park, mall and humanistic features in the entire Kaohsiung region. Each subsequently enhanceing the quality of life among citizens of southern Taiwan.

E United Group has withstood many economic downturns and developed a profound understanding of the qualities required for long term business growth and prosperity, namely, development of operational strength and continual innovation and development.



# Exhibit 3

### Asiazone Co., Limited's Internal Organization



# Exhibit 4

### Detail trasaction between Asiazone and its related companies

	Affiliates	Products/Serices Provided to Asiazone	
[			]
[			]
[			]
[			]
[			]
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### Asiazone's Purchase from Affiliates during the Investigation Period

### Asiazone's Sales to Affiliates during the Investigation Period

	Affiliates	Products/Serices Sold by Asiazone	
[			]
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# Exhibit 5

## DOCUMENT(S) INCAPABLE OF SUMMARY

# Exhibit 6

## DOCUMENT(S) INCAPABLE OF SUMMARY

# Exhibit 7

## DOCUMENT(S) INCAPABLE OF SUMMARY

# Exhibit 8

## DOCUMENT(S) INCAPABLE OF SUMMARY

# Exhibit 9

#### Asiazone Co., Limited

#### **INCOME STATEMENT**

		Most recent comple	eted financial year	Investigation 1 July 2011 - 30 .	
	Asiazone's Income Statement Item (Page 32 of 2011 Audit Report)	All products	The Galvanized Steel	All products	The Galvanized Steel
Gross Sales (1) Sales returns, rebates and discounts (2) Net sales (3) = (1-2) Raw materials (4) Direct labour (5) Depreciation (6) Manufacturing overheads (7)	Trunover Trunover				
Cost of Sales (8) Total cost to make (9) = (4+5+6+7+8) Operating income (10) = (3-9) Selling expenses (11)	Cost of sales				
Administrative & general expenses (12) Financial expenses (13) SG&A expenses (14) = (11+12+13) Income from normal activities (15) = (10- 14) Interest income (16) Interest expense (enter as negative) (17)	Administrative expenses Finance costs				
Extraordinary gains/losses (enter losses as negative) (18)	Other income				
Abnormal gains/losses (enter losses as negative) (19) Profit before tax (20) =(15+16+17+18+19)	Share of loss from an associate/Impairment of interests in a subsidiary				
Tax (21)	Income Tax				
Net profit (22) = (20-21)	income rax				

# Exhibit 10

### Asiazone Co., Limited

### SALES SUMMARY

	All Products		Galvanized Steel	
	Most recent completed financial year		Investigation period: 1 July 2011 - 30 June 2012	
	Volume (MT)	Value (USD)	Volume (MT)	Value (USD)
Total company turnover (all products) domestic market exports to Australia exports to other countries Turnover of the sector including the goods				
domestic market exports to Australia exports to other countries Turnover of the goods (GI) domestic market exports to Australia exports to other countries				

# Exhibit 11

[	Name	Address	Contact Information	Level of Trade
[				
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# Exhibit 12

## **Please Refer to Electronic File**

# Exhibit 13

## DOCUMENT(S) INCAPABLE OF SUMMARY

# Exhibit 14

	Asiazone	Galvanized Steel			
	EXPORTED MODEL		IDENTICAL?	DIFFERENCES	
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# Exhibit 15

## **Please Refer to Electronic File**

# Exhibit 16

## DOCUMENT(S) INCAPABLE OF SUMMARY

# Exhibit 17

## **Please Refer to Electronic File**