



RESPONSE to EXPORTER QUESTIONNAIRE

deep drawn stainless steel sinks EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA

*Komodo Hong Kong Limited's Manufacturer- Zhongshan Xintian
Hardware Co., Ltd.*

Period of Investigation: 1 JANUARY – 31 DECEMBER 2013

Response due by: **24 APRIL 2014**
(As Extended to May 8, 2014)

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RETURN OF QUESTIONNAIRE DETAILS

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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: **Komodo Hong Kong Limited (“Komodo HK”)
Guangzhou Komodo Kitchen Technology Co., Ltd. (“Komodo GZ”)**

Name: **Leslie Zhou (Zhou Xiamei)**
Position in the company: **Logistics Manager**
Address: **Room 702, Tian’an Development Plaza,
Technology Park 555 Panyu Avenue,
Guangzhou**
Telephone: **+86-20-39218603**
Facsimile number: **+86-20-39218768**
E-mail address of contact person: **leslie.zhou@komodolink.com**

Factory: **Zhongshan Xintian Hardware Co., Ltd. (“Xintian”)**

Name: **Elva Xing (Xing Manjing)**
Position in the company: **Sales Manager**
Address: **North Shenghui Industrial Zone, Nantou,
Zhongshan City, Guangdong Province**
Telephone: **+86-760-23136906**
Facsimile number: **+86-760-23136283**
E-mail address of contact person: **sales@xintian-cn.com**

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

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

Name: **Mr. Li Huaduan of Beijing Great Wall Law Firm**
Address: **Third Floor, China World Trade Office, No. 1
JianGuoMenWai Avenue, Beijing China**
Telephone: **+86-13911062352**
Facsimile number: **+86-10-65057869**
E-mail address of contact person: **lihuaduan@greatwalllaw.com.cn**

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Note that in nominating a representative, the Commission will assume that confidential material relating to your company in this investigation may be freely released to, or discussed with, that representative.

A-3 Company information

1. What is the legal name of your business? What kind of entity is it (e.g. company, partnership, sole trader)? Please provide details of any other business names that you use to export and/or sell goods.

Answer:

Zhongshan Xintian Hardware Co., Ltd. (“Xintian”) is the manufacturer of subject products. Xintian is a limited liability company and Xintian does not use any other business names to sell goods.

Xintian does not have any customer in Australia and does not export subject products to Australia. Xintian has no information concerning the export of subject products to Australia. So the questions related to the export of subject products will be answered by the exporter Komodo Hong Kong Limited (“Komodo HK”) in their questionnaire response.

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

Answer:

The shareholders of Xintian are as follows:

Name of Shareholder	Shareholding Percentage
[]	[]
[]	[]

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

Answer:

Not applicable as Xintian is not subsidiary of other company.

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

Answer:

Not applicable as Xintian is not subsidiary of other company.

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

Answer:

Not applicable as Xintian is no associated or affiliated companies.

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

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Answer:

Not applicable, as Xintian has no parent company or affiliated companies.

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

Answer:

Xintian is the producer of the subject merchandise.

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

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

Answer:

Xintian does not export subject products to Australia and other countries. The above two functions are performed by Komodo HK and Komodo GZ. Please refer to answer to question A-1 for the whole name and address of Komodo HK and Komodo GZ.

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

Answer:

Please refer to Exhibit A-1 for internal organisation chart of Xintian.

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

Answer:

Xintian is not public listed company and do not publish "annual report". Please refer to Exhibit A-2 for the products brochure of Xintian.

A-4 General accounting/administration information

1. Indicate your accounting period.

Answer: January 1st to December 31st, per calendar year.

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

Answer:

The financial records are held in the company location as provided in question A-1.

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3. Please provide the following financial documents for the two most recently completed financial years plus all subsequent monthly, quarterly or half yearly statements:
- chart of accounts;

Answer:

Please refer to Exhibit A-3 for chart of accounts of Xintian.

- audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);

Answer:

Please refer to Exhibit A-4 for 2012 and 2013 audited financial statements of Xintian.

- internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods under consideration.

These documents should relate to:

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

Answer:

Please refer to Exhibit A-5 for the monthly financial reports of Xintian during the investigation period.

Xintian do not have division or sectors financial statements in the normal business operation.

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

Answer:

Not applicable. See preceding response.

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

Answer:

Xintian's accounting practices are in accordance with the generally accepted accounting principles in China. See Auditor's Reports at Exhibit A-4.

6. Describe:

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

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

Answer:

Xintian uses monthly weighted average method in valuation for raw materials and finished goods inventory. It does not have work-in-process in the normal course of accounting.

- costing methods, including the method (eg by tonnes, units, revenue, direct costs etc) of allocating costs shared with other goods or processes (such as front office cost, infrastructure cost etc);

Answer:

Xintian calculates a standard cost for each model produced. Main materials, such as stainless steel, are allocated by the standard cost only among the models used such main materials.

Costs of supplemental materials, labour and overhead are allocated by the standard cost among all products produced.

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

Answer:

Damaged goods are always treated as scraps and sold out at lower price. Sub-standard products will be reworked.

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

Answer:

Scraps are sold out periodically. But Xintian does not trace the quantity of scrap generated during the production, neither does it offsets the scrap from the total cost of production. It only records scrap sales income in the other operation income account. In the CTMS reporting, we divided the POI scrap sales income by the cost of goods sold and applied such ratio to the cost of production of each model to calculate the scrap offset in “other cost” item.

There is no by products or joint products during the production of stainless steel sinks.

- valuation and revaluation methods for fixed assets;

Answer:

Xintian values the fixed assets according to the actual cost incurred.

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

Answer:

Xintian uses straight-line method in depreciation.

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

Answer:

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Not applicable, as Xintian only has domestic sales.

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

Answer:

Please see the above response.

- inclusion of general expenses and/or interest;

Answer:

General expenses include expenses not directly associated with transactions, such as office staff salary, travel expenses, insurance, office expenses, etc. Interest income and interest cost are all recorded in financial expenses account.

- provisions for bad or doubtful debts;

Answer:

Xintian takes specific identification method and consider the recoverability of a debt to draw provision.

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

Answer:

Not applicable.

- costs of plant closure;

Answer:

Not applicable.

- restructuring costs;

Answer:

Not applicable.

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

Answer:

Scraps are sold out periodically and the incomes are recorded into other operation income.

- effects of inflation on financial statement information.

Answer:

Not applicable.

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

Answer:

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There is no material change to accounting policies over the last two years.

A-5 Income statement

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

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

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

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

Answer:

Please see Exhibit A-6 Income Statement Spreadsheet.

A-6 Sales

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

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

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

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

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

Answer:

Please see Exhibit A-7 Turnover Spreadsheet.

SECTION B - SALES TO AUSTRALIA (EXPORT PRICE)

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

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

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

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

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

Answer:

Xintian does not export subject products to Australia. Xintian has no information concerning the export of subject products to Australia. So the questions in section B- SALES TO AUSTRALIA (EXPORT PRICE) are not applicable to Xintian. The questions in Section B will be answered by the exporter Komodo HK. Please refer to the response of Komodo HK.

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

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

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

- Describe how the goods are sent to each customer in Australia, including a diagram if required.
- 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.
- Explain who retains ownership of the goods at each stage of the distribution chain. In the case of DDP sales, explain who retains ownership when the goods enter Australia.
- Describe any agency or distributor agreements or other contracts entered into in relation to the Australian market (supply copy of the agreement if possible).

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- (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.
- (f) State whether your firm is related to any of its Australian customers. Give details of any financial or other arrangements (eg free goods, rebates, or promotional subsidies) with the customers in Australia (including parties representing either your firm or the customers).
- (g) Details of the forward orders of the goods under consideration (include quantities, values and scheduled shipping dates).

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.

B-4 Australian sales data

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

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

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

Column heading	Explanation
Customer name	names of your customers
Level of trade	the level of trade of your customers in Australia
Model	commercial model/grade or type
Number of bowls	the number of bowls of the sink sold, for example single bowl, 1 and ½ bowls, double bowl, etc.
Drainer boards	If the sink includes one or more drainer boards, identify the number of these
Finish	sink surface finish e.g. polished, brushed, unfinished
Brand name	If the sink is sold under a particular brand name, identify this
Product tier	In the application, the Australian industry identified that sinks may be classified into entry-level, mid or top-range sinks, which is relative to their pricing. Identify if the sink sold is considered entry-level, mid or top-range product.
Accessories included	If the sink is sold with 'accessories' other than the sink and drainer board itself, identify which accessories are included (e.g. strainer, etc)
Product code	Code used in your records for the model/grade/type identified. Explain the product codes in your submission.
Invoice number	invoice number
Invoice date	invoice date
Date of sale	Refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale, report that date. For example, order confirmation, contract, or purchase order date.
Order number	If applicable, show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Shipping terms	Delivery terms eg. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	Agreed payment terms eg. 60 days=60 etc
Quantity	Quantity in units shown on the invoice. Show basis eg kg.

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Gross invoice value	Gross invoice value shown on invoice <i>in the currency of sale, excluding taxes.</i>
Discounts on the invoice	If applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Other charges	Any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide a description.
Invoice currency	the currency used on the invoice
Exchange rate	Indicate the exchange rate used to convert the currency of the sale to the currency used in your accounting system
Net invoice value in the currency of the exporting country	the net invoice value expressed in your domestic currency as it is entered in your accounting system
Rebates or other allowances	the amount of any deferred rebates or allowances paid to the importer in the currency of sale
Quantity discounts	the actual amount of quantity discounts not deducted from the invoice. Show a separate column for each type of quantity discount.
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 transportation costs*	inland transportation costs included in the selling price. For export sales this is the inland freight from factory to port in the country of export.
Handling, loading & ancillary expenses*	handling, loading & ancillary expenses. For example, terminal handling, export inspection, wharfage & other port charges, container tax, document fees & customs brokers fees, clearance fees, bank charges, letter of credit fees, & other ancillary charges incurred in the exporting country.
Warranty & guarantee expenses*	warranty & guarantee expenses
Technical assistance & other services*	expenses for after sale services, such as technical assistance or installation costs.
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 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.

** FOB export price and Ocean Freight:

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

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

Freight allocations must be checked for consistency.

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

B-5 If there are any other costs, charges or expenses incurred in respect of the exports listed above which have not been identified in the table above, add a column (see “other factors” in question B-4) for each item, and provide a

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description of each item. For example, other selling expenses (direct or indirect) incurred in relation to the export sales to Australia.

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

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

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.

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.

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

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

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

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

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

SECTION C - EXPORTED GOODS & LIKE GOODS

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

Answer:

Please refer to the response of Komodo HK.

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

Answer:

Please refer to the response of Komodo HK.

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

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

EXPORTED TYPE	DOMESTIC TYPE	IDENTICAL?	DIFFERENCES
Product code of each model of the goods 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

Answer:

All the models sold by Xintian to Komodo Companies were developed by Komodo. Xintian did not sell these models to other customers including domestic customer. In addition, the Australia consumers have different demands on product features of sinks with Chinese consumers. So there is no like good sold on the domestic market.

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

Answer:

Please refer to Exhibit A-2 Products Brochure of Xintian and Exhibit C-1 for a list and description of models sold in domestic market.

SECTION D - DOMESTIC SALES

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

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

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

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

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

D-1 Provide:

- a detailed description of your distribution channels to domestic customers, including a diagram if appropriate;
- information concerning the functions/activities performed by each party in the distribution chain; and
- a copy of any agency or distributor agreements, or contracts entered into.

If any of the customers listed are associated with your business, provide details of that association. Describe the effect, if any, that association has upon the price.

Answer:

Domestic sales included:

- 1) Sales to trading companies (like Komodo Companies), which were destined for export.**
- 2) Sales to domestic distributors.**

D-2 Do your domestic selling prices vary according to the distribution channel identified? If so, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Answer:

Prices were set on transaction-by-transaction basis and vary according to many factors, such as purchase volume, product features, raw material prices as well as competitors' prices, not just according to distribution channel.

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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:

The sales process is:

Xintian negotiates price with domestic customers, if a mutual price is reached by both parties, Xintian starts to arrange production. When the production is finished, Xintian delivers the goods and issue invoice to customers.

Xintian is responsible for delivery of the goods in sales to most of its customers, except Komodo companies who is borne itself.

D-4 Domestic sales data

Complete the ‘**Domestic sales**’ spreadsheet in the ***Exporter Questionnaire spreadsheets – sinks*** workbook.

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

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

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	commercial model/grade or type of the goods
Number of bowls	the number of bowls of the sink sold, for example single bowl, 1 and ½ bowls, double bowl, etc.
Drainer boards	If the sink includes one or more drainer boards, identify the number of these
Finish	sink surface finish e.g. polished, brushed, unfinished
Brand name	If the sink is sold under a particular brand name, identify this
Product tier	In the application, the Australian industry identified that sinks may be classified into entry-level, mid or top-range sinks, which is relative to their pricing. Identify if the sink sold is considered entry-level, mid or top-range product.
Accessories included	If the sink is sold with ‘accessories’ other than the sink and drainer board itself, identify which accessories are included (e.g. strainer, etc)
Product code	code used in your records for the model/grade/type of the goods identified. Explain the product codes in your submission.
Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale and should be used, report that date. For example, order confirmation, contract, or purchase order date.
Order number	show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Delivery terms	eg ex factory, free on truck, delivered into store
Payment terms	payment terms agreed with the customer eg. 60 days=60 etc

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Quantity	quantity in units shown on the invoice eg kg.
Gross Invoice value	gross value shown on invoice <i>in the currency of sale</i> , net of taxes.
Discounts on the Invoice	the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Other charges	any other charges, or price reductions, that affect the net invoice value. Insert additional columns and provide description.
Net invoice value in the currency of the exporting country	the net invoice value expressed in your domestic currency as recorded in your accounting system
Rebates or other Allowances	the actual amount of any deferred rebates or allowances in the currency of sale
Quantity discounts	the actual amount of quantity discounts not deducted from the invoice. Show a separate column for each type of quantity discount.
Packing*	packing expenses
Inland transportation Costs*	amount of inland transportation costs included in the selling price.
Handling, loading And ancillary Expenses*	handling, loading & ancillary expenses.
Warranty & Guarantee expenses*	warranty & guarantee expenses
Technical assistance & other services*	expenses for after sale services such as technical assistance or installation costs.
Commissions*	commissions paid. If more than one type is paid insert additional columns of data.
Other factors*	any other costs, charges or expenses incurred in relation to the domestic sales (include additional columns as required). See question D5.

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

Answer:

Please refer to Exhibit D-1 for the Domestic Sales spreadsheet.

It should be explained that, the sales to trading companies (include sales to Komodo and other trading companies) were destined for export. These sales are not for domestic consumption.

So, Xintian just report the sales to domestic distributors in the above spreadsheet.

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.

Answer:

There is no any other cost, charge or expense incurred in respect of the sales listed which have not been identified in the table in question D-4.

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.

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

Answer:

Xintian may offer discounts to customers for quality claims. The discount amounts are shown in invoices and reported in Exhibit D-1 accordingly.

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

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

Answer:

Please refer to Exhibit D-2 for documents of two domestic sales.

SECTION E - FAIR COMPARISON

Section B sought information about the export prices to Australia and Section D sought information about prices on your domestic market for like goods (ie. the normal value).

Where the normal value and the export price are not comparable adjustments may be made. This section informs you of the fair comparison principle and asks you to quantify the amount of any adjustment.

As prices are being compared, the purpose of the adjustments is to eliminate factors that have unequally modified the prices to be compared.

To be able to quantify the level of any adjustment it will usually be necessary to examine cost differences between sales in different markets. The Commission must be satisfied that those costs are likely to have influenced price. In practice, this means that the expense item for which an adjustment is claimed should have a close nexus to the sale. For example, the cost is incurred because of the sale, or because the cost is related to the sale terms and conditions.

Conversely, where there is not a direct relationship between the expense item and the sale a greater burden is placed upon the claimant to demonstrate that prices have been affected, or are likely to have been affected, by the expense item. In the absence of such evidence the Commission may disallow the adjustment.

Where possible, the adjustment should be based upon actual costs incurred when making the relevant sales. However, if such specific expense information is unavailable cost allocations may be considered. In this case, the party making the adjustment claim must demonstrate that the allocation method reasonably estimates costs incurred.

A party seeking an adjustment has the obligation to substantiate the claim by relevant evidence that would allow a full analysis of the circumstances, and the accounting data, relating to the claim.

The investigation must be completed within strict time limits therefore you must supply information concerning claims for adjustments in a timely manner. Where an exporter has knowledge of the material substantiating an adjustment claim that material is to be available at the time of the verification visit. The Commission will not consider new claims made after the verification visit.

E-1 Costs associated with export sales

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

Answer:

Xintian do not make export sales. The questions in Section E-1 Costs associated with export sales are not applicable to Xintian. The following questions in Section E-1 will be answered by Komodo HK. Please refer to the response of Komodo HK.

1. Transportation

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

Answer: Not applicable.

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.

Answer: Not applicable.

3. Credit

The cost of extending credit on export sales is not included in the amounts quantified at question B4. However, the Commission will examine whether a credit adjustment is warranted and determine the amount. Provide applicable interest rates over each month of the investigation period. Explain the nature of the interest rates most applicable to these export sales eg, short term borrowing in the currency concerned.

If your accounts receivable shows that the average number of collection days differs from the payment terms shown in the sales listing, *and if* export prices are influenced by this longer or shorter period, calculate the average number of collection days. See also item 4 in section E-2 below.

Answer: Not applicable.

4. Packing costs

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

Answer:

Stainless steel sinks are generally packed with carton, paper board and foam etc. However, Xintian do not record packing cost separately in its account

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and just count the packing cost in the total cost of sink products. Material costs associated with packing have been reported in the Australian CTMS reported by Xintian, and the labor costs associated have been included in “direct labor” in Australian CTMS.

5. Commissions

For any commissions paid in relation to the export sales to Australia:

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

Report the amount in the sales listing in question B-4 under the column headed “**Commissions**”. Identify the general ledger account where the expense is located.

Answer: Not applicable.

6. Warranties, guarantees, and after sales services

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

Answer: Not applicable.

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: Not applicable.

8. Currency conversions

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

Answer: Not applicable.

E-2 Costs associated with domestic sales

(These cost adjustments will relate to your responses made at question D-4, “domestic sales”)

The following items are not separately identified in the amounts quantified at question D-4. However you should consider whether any are applicable.

1. Physical characteristics

The adjustment recognises that differences such as quality, chemical composition, structure or design, mean that goods are not identical and the differences can be quantified in order to ensure fair comparison.

The amount of the adjustment shall be based upon the market value of the difference, but where this is not possible the adjustment shall be based upon the difference in cost plus the gross profit mark-up (i.e. an amount for selling general and administrative costs (S G & A) plus profit).

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

You should provide copies of your Bill of Materials for both the goods exported to Australia and those associated with domestic sales, and identify those components or inputs into production that are different, for example, specify different:

- Steel grades (Grade 304);
- Chrome/nickel content (18/10, compared with 18/8);
- Steel gauge (18, 20 or 22 gauge);
- Bowl finish (labour hours to achieve a brushed or polished finish);
- Inclusion or exclusion of a drainer board; and
- Inclusion or exclusion of a strainer/basket waste.

Answer:

Not applicable, Xintian does not claim such Physical characteristics adjustment.

2. Import charges and indirect taxes

If exports to Australia:

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

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

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The taxes and duties include sales, excise, turnover, value added, franchise, stamp, transfer, border, and excise taxes. Direct taxes such as corporate income tax are not included as such taxes do not apply to the transactions.

Adjustment for drawback is not made in every situation where drawback has been received. Where an adjustment for drawback is appropriate you must provide information showing the import duty borne by the domestic sales. (That is, it is not sufficient to show the drawback amount and the export sales quantity to Australia. For example, you may calculate the duty borne on domestic sales by quantifying the total amount of import duty paid and subtracting the duty refunded on exports to all countries. The difference, when divided by the domestic sales volume, is the amount of the adjustment).

In substantiating the drawback claim the following information is required:

- a copy of the relevant statutes/regulations authorising duty exemption or remission, translated into English;
- the amount of the duties and taxes refunded upon *exportation* and an explanation how the amounts were calculated and apportioned to the exported goods;
- an explanation as to how you calculated the amount of duty payable on imported materials is borne by the goods sold *domestically* but is not borne by the exports to Australia;

Substitution drawback systems

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

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

Answer:

Not applicable, as Xintian did not import any raw materials.

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.

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

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

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

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

This requires the following information:

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

or

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

Answer:

Not applicable, Xintian does not claim the level of trade adjustment.

4. Credit

The cost of extending credit on domestic sales is not included in the amounts quantified at question D-4. However, the Commission will examine whether a credit adjustment is warranted and determine the amount. An adjustment for credit is to be made even if funds are not borrowed to finance the accounts receivable.

The interest rate on domestic sales in order of preference is:

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- the rate, or average of rates, applying on actual short term borrowing's by the company; or
- the prime interest rate prevailing for commercial loans in the country for credit terms that most closely approximate the credit terms on which the sales were made; or
- such other rate considered appropriate in the circumstances.

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

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

Where there is no fixed credit period agreed at the time of sale the period of credit is determined on the facts available. For example, where payment is made using an open account system¹, the average credit period may be determined as follows:

1. *Calculate an accounts receivable turnover ratio*

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

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

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

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

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.

Answer:

Please refer to Exhibit E-1 Expenses Calculation Spreadsheet for the calculation of accounts receivable turnover ratio and average credit period for all domestic customers.

¹ Under an open account system, following payment the balance of the amount owing is carried into the next period. Payment amounts may vary from one period to the next, with the result that the amount owing varies.

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

5. Transportation

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

Answer:

We calculated and reported inland transportation expenses for each domestic sale. Please refer to Exhibit E-1 Expenses Calculation Spreadsheet.

6. Handling, loading and ancillary expenses

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

Answer: Not applicable. No above expenses incurred.

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**”.

Answer:

Stainless steel sinks are generally packed with carton, paper board and foam etc. However, Material costs associated with packing have been reported in the domestic CTMS, and the labor costs associated have been included in “direct labor” in domestic CTMS.

8. Commissions

For any commissions paid in relation to the domestic sales:

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

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

Answer: Not applicable as no commission was paid.

9. Warranties, guarantees, and after sales services

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

Answer: Not applicable as. No above cost incurred.

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*.

Answer: Not applicable. Xintian does not claim adjustment of other factors.

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.

Answer: Not applicable.

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

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

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

F-1 Third country sales data

Complete the ‘Third country’ spreadsheet in the **Exporter Questionnaire spreadsheets – sinks** workbook.

This data should be provided on a summary basis.

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

Column heading	Explanation
Country	Name of the country that you exported like goods to over the investigation period.
Number of customers	The number of different customers that your company has sold like goods to in the third country over the investigation period.
Level of trade	The level of trade that you export like goods to in the third country.
Quantity	Indicate quantity, in units, exported to the third country over the investigation period.
Unit of quantity	Show unit of quantity eg kg
Value of sales	Show net sales value to all customers in third country over the investigation period
Currency	Currency in which you have expressed data in column SALES
Payment terms	Typical payment terms with customer(s) in the country eg. 60 days=60 etc
Shipment terms	Typical shipment terms to customers in the third country eg CIF, FOB, ex-factory, DDP etc.

Answer:

Xintian did not make export sale. Both the products sold to Komodo and other trading company may be exported to third country. But Xintian does not know the destination information. Please refer to the response of Komodo HK.

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

Answer:

Not applicable, please see the response to previous question.

SECTION G - COSTING INFORMATION AND CONSTRUCTED VALUE

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

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

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

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

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

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

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

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

G-1. Production process and capacity

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

Answer:

Please refer to the Exhibit G-1 for the Production Flowchart.

G-2. Production capacity data

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

Answer:

Please refer to the Exhibit G-2 for the Production Spreadsheet.

G-3. Cost accounting practices

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

Answer:

Xintian's accounting is done on monthly basis. In each month, the accountants calculate cost of production for each product produced and debit the cost of production in the finished goods ledger. Then sales are made, the accountants credit finished goods ledger and debit the finished goods ledger by weighted average method. The annual accumulative cost of goods sold reconciles to the audited financial statements.

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

Answer:

Xintian calculates a standard cost of each model considering the major raw materials and labor cost. In the cost of production calculation, the accountants allocated the total actual costs to each product by the standard costs. That is, the standard cost only acts as an allocation ratio.

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

Answer:

Not applicable. There was no significant or unusual cost variances occurred during the investigation period.

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

Answer: Not applicable. Xintian does not use profit/cost centers.

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

Answer: Not applicable. Xintian does not use profit/cost centers.

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

Answer: Xintian calculate the cost for each model.

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

Answer:

Not applicable, as Xintian does not value costs differently for cost accounting

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purposes and financial accounting purposes.

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

Answer:

Not applicable, as Xintian did not engaged in any start-up operations in relation to the goods under consideration during the investigation period.

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

Answer:

Not applicable, as Xintian did not engaged in any start-up operations in relation to the goods under consideration during the investigation period.

G-4 Cost to make and sell on domestic market

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

Complete the ‘**Domestic CTMS**’ spreadsheet in the **Exporter Questionnaire spreadsheets – sinks** workbook.

- Please provide the actual unit cost to make and sell **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.
- Provide this cost data for each quarter over the investigation period. If your company calculates costs monthly, provide monthly costs.
- Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.
- Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.
- If you are unable to supply this information in this format, please contact the case officer for this investigation at the address shown on the cover of this questionnaire.
- Please specify unit of currency.
- Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.

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

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- In calculating the unit cost to make and sell, provide an explanation if the allocation method used (eg number, or weight etc) to determine the unit cost differs from the prior practice of your company.
- Supply your Bill of Materials **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.

Answer:

Please refer to Exhibit G-3 Domestic CTMS for models sold in domestic market.

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

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

Complete the 'Australian CTMS' spreadsheet in the *Exporter Questionnaire spreadsheets – sinks* workbook.

- Please provide the actual unit cost to make and sell **separately for each model/type** (identified in section C) of the goods sold to Australia.
- Provide this cost data for each quarter over the investigation period. If your company calculates costs monthly, provide monthly costs.
- Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.
- Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.
- If you are unable to supply this information in this format, please contact the case officer for this investigation at the address shown on the cover of this questionnaire.
- Please specify unit of currency.
- Where there are cost differences between goods sold to the domestic market and those sold for export, give reasons and supporting evidence for these differences.
- Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.
- In calculating the unit cost to make and sell, provide an explanation if the allocation method used (eg number, or weight etc) to determine the unit cost differs from the prior practice of your company.
- Supply your Bill of Materials **separately for each model/type** (identified in section C) of the like goods sold on the domestic market.

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Answer:

Please refer to Exhibit G-4 Australian CTMS for models exported to Australia.

G-6 Major raw material costs

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

For these major inputs:

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

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

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

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

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

Answer:

The major raw material for drawn stainless steel sink is stainless steel. Please refer to Exhibit G-5 for list of suppliers of main raw material. No materials sourced in-house and from associated entities. Raw materials are valued at actual cost at the invoiced value from suppliers.

SECTION H – PARTICULAR MARKET SITUATION

The applicants claim that a ‘market situation’ exists in respect of deep drawn stainless steel sinks from China due to government influence on both the prices of the goods and the major raw material inputs (cold-rolled stainless steel) used in the manufacture of the goods.

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

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

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

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

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

There are three parts to this section:

PART H-1 - Requests information concerning the organisation of your company and the Government of China’s involvement in the business of your company.

PART H-2 - Requests information concerning the Government of China’s measures with respect to the steel industry in China.

PART H-3 - Requests information concerning the deep drawn stainless steel sinks sector in the region where your company is located.

PART H-1 GENERAL INFORMATION

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

NON-CONFIDENTIAL VERSION

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

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

- a) reporting requirements;

Answer:

Xintian is not required to report any business decision to any level of GOC.

According to Chinese regulations, for business license annual inspection purpose, an enterprise shall provide annual financial summaries (include annual balance sheet and income statement) to relevant industrial and commercial administrative authority.

- b) payment of taxes;

Answer:

Taxes are paid according to Chinese laws and regulations.

- c) senior management representation within your business;

Answer:

Xintian's senior management representations are selected/appointed by the shareholders/directors of the company.

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

Answer:

Xintian is a privately owned company; there is no supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC.

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

Answer:

All major business decision are decided by Xintian's shareholders/directors and senior management. There is no any government involvement.

- f) licensing;

Answer:

According to Chinese regulations, an enterprise is required to obtain a business license before operation. Xintian does not need to obtain any specific license for producing and selling the merchandise under consideration.

- g) restrictions on land use;

Answer:

NON-CONFIDENTIAL VERSION

There is no restriction on land use for Xintian.

- h) provision of loans; or

Answer:

Not applicable as Xintian does not have any loan.

- i) provision of grants, awards or other funds.

Answer:

Xintian did not receive any grants, awards or other funds.

2. Business structure, ownership and management

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

Answer:

Xintian is not a State-owned or state-invested enterprise.

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

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

Answer:

The list of directors and shareholders of Xintian are as follows:

Shareholders	Directors
[]	[]
[]	[]
	[]

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

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

Answer:

No members of Xintian's directors or shareholders representatives, employees, or otherwise affiliated with the GOC.

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

NON-CONFIDENTIAL VERSION

Answer:

Xintian is not a publicly-traded company.

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

Answer:

Shareholder/directors have the ability to reward, fire or discipline Xintian's senior managers.

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

Answer:

No senior managers hold positions in any Government of China departments or organizations, associations or Chambers of Commerce.

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

Answer:

Xintian does not have a pricing committee, all pricing related decisions are made by the directors and/or the senior managements.

3. Licensing

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

Answer:

Please refer to Exhibit H-1, for the Business License of Xintian.

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

Answer:

Xintian's business license is issued by Industrial and Commercial Administrative Bureau of Zhongshan City.

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

Answer:

To obtain the business license, a company needs to go through the following procedures:

- (1) Company name pre-approval;**
- (2) Capital verification;**
- (3) Registration application.**

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

Answer:

NON-CONFIDENTIAL VERSION

In accordance with P.R. China Company Law, a company must have a name, an operation location, enough registered capital, and articles of association to obtain the business license.

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

Answer:

No restrictions imposed on Xintian's business within the business scope.

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

Answer:

Xintian does not operate outside the scope of the business scope.

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

Answer:

The business license entitles Xintian the status of a legal person to operate independently and on its own profits and liabilities.

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

Answer:

A company's business license can be revoked if:

- 1) The company is declared bankrupt;**
- 2) Pursuant to the provisions of the company's articles of association, the term of operation of the company expires or one of other events which are grounds for dissolution occurs;**
- 3) A resolution for dissolution is passed by the shareholders' meeting;**
- 4) Dissolution is necessary due to a merger or division of the company;**
- 5) Other circumstance of dissolution set out by laws or regulations.**

4. Decision-making, planning and reporting

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

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

Answer:

In Xintian, all important matters are decided by shareholders, i.e. [].

NON-CONFIDENTIAL VERSION

There is no government body or official involved into the decision making process of Xintian.

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

Answer:

There is no GOC input into Xintian's decision-making process.

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

Answer:

There is no government department/office that is involved, either directly or indirectly, in Xintian's manufacture, sale or purchase.

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

Answer:

Xintian files financial statements to Administrative Bureau of Industry and Commerce annually for the purpose of business license annual inspection. There is no other report need to be filed to any government department.

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

Answer:

Xintian focuses on its own business and does not aware any provincial/city Five Year Plans.

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

Answer:

As a small privately owned company, Xintian does not develop any five-year plan or similar planning documents in its normal business operation.

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

Answer:

Xintian is a small company, it has only two shareholders. There's no written shareholder meeting minutes.

NON-CONFIDENTIAL VERSION

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

Answer:

The selling prices of Xintian are decided by the senior managements in daily operation. There's no such meeting note.

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

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

1. Are there any other Government of China opinions, directives, decrees, promulgations, measures, etc. concerning the steel industry/sector that were put in place or operating during the investigation period?

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

Answer:

Xintian is not aware any GOC opinions, directives, decrees, promulgations, measures that were put in place or operating during the investigation period.

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

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

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

Answer:

As a small company, Xintian focuses on its own business and does not possess much knowledge on the responsibilities of each GOC department or bureau etc. Xintian also is not aware any interference or control from the GOC in its normal business.

NON-CONFIDENTIAL VERSION

3. National Steel Policy

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

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

NON-CONFIDENTIAL VERSION

- Identify any Government of China bodies at the regional or provincial level that have the responsibility to grant the approval, or refuse approval regarding an investment in the steel sector.
 - Are review and approval decisions regarding investments in the steel sector made by the central government or are they delegated to the regional or provincial level?
- i) Describe the role of the National Development and Reform Commission in terms of communicating, implementing and overseeing policies governing the steel sector, including but not limited to, China's National Steel Policy.

Answer:

The sink products are normal house wares, do not belong to steel and iron industry. The national steel policy has nothing to do with Xintian's business and operation. The policy has never been communicated to Xintian and no information was provided to Xintian. The policy do not has any effect on Xintian's operation. Xintian does not have any knowledge on the policy and thus can't make any response to the following questions from a) to i).

4. Other government approvals

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

- a) Explain whether your company has undertaken an approval process through the Government of China for any steel investments in the last 10 years.

Answer:

Xintian has never undertaken any approval process through the GOC for any steel investments.

- b) Explain whether any applicable investments received the necessary approval and if so, provide documentation confirming this approval.

Answer:

Not applicable, since Xintian has not been requested to obtain such approval.

- c) If your investment was not approved, provide the reasons given for the refusal.

Answer:

Not applicable as Xintian has not undertaken the approval process for any steel investment.

- d) Describe the process your company has to follow to obtain these approvals.

Answer:

NON-CONFIDENTIAL VERSION

Not applicable as Xintian has not undertaken the approval process for any steel investment.

- e) Provide a translated copy of the application form along with the original Chinese version.

Answer:

Not applicable as Xintian has not undertaken the approval process for any steel investment.

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

Answer:

Not applicable as Xintian has not undertaken the approval process for any steel investment.

5. Steel industry rationalisation

The below questions address the efforts of the Government of China to rationalise the steel industry sector in China through a combination of closures and consolidations of steel making assets.

- a) Describe to what extent, if any, your company has been directed, encouraged or requested to merge or consolidate operations with one or several other steel in China either by the National Development and Reform Commission or any other entities.

Answer:

Xintian did not been directed, encouraged or requested to merge or consolidate operations with one or several other steel producers in China by the NDRC or any other steel authority or association in China.

- b) Describe to what extent, if any, a facility owned by your company has ever been identified by the Government of China as a candidate for closure within the next two years.

Answer:

No facility owned by Xintian has ever been identified as a candidate for closure within the next two years.

PART H-3 THE DEEP DRAWN STAINLESS STEEL SINKS SECTOR

The information requested in this part will assist in providing a better understanding of the Government of China measures and your business' sales and production of deep drawn stainless steel sinks.

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

1. Export quotas and licensing

NON-CONFIDENTIAL VERSION

- a) Are deep drawn stainless steel sinks sold by your company subject to any export quotas?

If so, explain why deep drawn stainless steel sinks are subject to quotas and the method by which the quotas are allocated.

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

Answer:

Xintian only made domestic sales, not subject any export or domestic quotas.

- b) If deep drawn stainless steel sinks are not presently subject to export quotas, indicate if quotas existed during the investigation period and when and why they were removed.

Answer:

Xintian only made domestic sales, not subject any export or domestic quotas.

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

Answer:

Not applicable, as Xintian only made domestic sales, not subject any export or domestic quotas.

- d) Has the Government of China set any targets or limits regarding the quantity of deep drawn stainless steel sinks that you may sell on the domestic or export markets? If so, provide details.

Answer:

Not applicable, as no such target or limit are set.

- e) Are there any export licence requirements for deep drawn stainless steel sinks? If so, provide details.

Answer:

Not applicable, as Xintian only made domestic sales.

2. Taxation

- a) Were there any export taxes on the exports of deep drawn stainless steel sinks during the investigation period?

Answer:

Not applicable, as Xintian only made domestic sales. And to the best knowledge of Xintian, there was no export tax on the export of drawn stainless steel sinks during the investigation period.

- b) What was the VAT rebate applicable to deep drawn stainless steel sinks exports during the investigation period?

Answer:

NON-CONFIDENTIAL VERSION

Not applicable, as Xintian only made domestic sales.

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

Answer:

Not applicable, as Xintian only made domestic sales.

- d) Are you aware of any tax changes being planned that would impact the deep drawn stainless steel sinks sector?

Answer:

Xintian is not aware of any planned tax changes.

3. Sales terms

- a) Identify the person who authorises the sales terms, prices and other contract provisions for the sale of deep drawn stainless steel sinks by your business.

Answer:

The directors/general manager have such authority to final the sales terms, prices and other contract provisions for the sale of deep drawn stainless steel sinks.

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

Answer:

The selling prices of deep drawn stainless steel sinks are determined by the directors/general manager. There is no government involvement in Xintian's pricing decisions.

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

Answer:

Xintian does not coordinate the selling prices or supply of stainless steel sinks with any domestic steel product producers, GOC departments or the CISA.

NON-CONFIDENTIAL VERSION

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

Answer:

Xintian does not provide stainless steel sinks price information to the GOC, CISA, other government officials or commercial organization.

- e) Explain whether your business provides deep drawn stainless steel sinks price data to any other person at the provincial, regional or special economic zone level of government.

Answer:

Xintian does not provide stainless steel sinks price data to any other person at the provincial, regional or special economic zone levels.

4. Involvement with CISA

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

Answer:

Xintian is not a member of CISA or regional Iron & Steel Associations.

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

Answer:

Not applicable, Xintian is not a member of CISA.

5. Other industry associations

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

Answer:

Xintian is not a member of any other industry association.

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

Answer:

Not applicable, Xintian is not a member of any other industry association.

NON-CONFIDENTIAL VERSION

6. Statistics submission/recording

- a) Indicate if your business makes submissions³ to the Chinese Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.

Answer:

Xintian makes submissions to the Bureau of Statistics. The submitted information includes amount of turnover, expense, assets liabilities and so on. The purpose of these submissions is to evaluate the local economic development condition and national statistics information.

- b) Provide a recent example of a submission that has been made to the Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.

Answer:

An example of submission to the Bureau of Statistics is provided as requested in Exhibit H-2.

- c) Do the organisations approve or assess your submission? If yes, provide a detailed explanation.

Answer:

The Bureau does not approve or assess the submission of Xintian.

- d) Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.

Answer:

The Bureau does not provide feedback to the submission of Xintian.

7. Raw material supply

- a) Is there a price difference in purchase price for raw materials (i.e. cold-rolled stainless steel or any other raw material) between your suppliers?

Answer:

The Purchase prices of raw materials from different suppliers are comparable, though they may have slight difference in consideration of market condition and negotiation for each specific transaction.

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

Answer:

Purchase prices from SOE and non-SOE are comparable in the same level.

The prices for raw materials are determined by the market condition, and each supplier determines the price based on its understanding of the market condition.

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

NON-CONFIDENTIAL VERSION

Note: the applicant alleges that producers in China of deep drawn stainless steel sinks have benefited from the provision of cold-rolled stainless steel by the Government of China at less than fair market value (see Program 1 in Section I of this questionnaire).

Further questions regarding cold-rolled stainless steel supply and pricing are asked in Section I of this questionnaire. Your responses to these questions are relevant to the assessment of whether a market situation exists. Ensure responses to these questions are complete.

8. Regional differences

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

Answer:

Not applicable, since Xintian's does not have production facilities in more than one region/province.

9. Deep drawn stainless steel sinks production/output during the investigation period

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

Answer:

There has no part of Xintian's production of stainless steel sinks subject to any national/regional industrial policy or guidance.

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

Answer:

Not applicable as there has no part of Xintian's production of stainless steel sinks subject to any national/regional industrial policy or guidance.

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

Answer:

Not applicable as there has no part of Xintian's production of stainless steel sinks subject to any national/regional industrial policy or guidance.

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

Answer:

NON-CONFIDENTIAL VERSION

Xintian is not aware of any other restriction to the sale of stainless steel sinks that may be imposed by the GOC.

10. Sales price during the investigation period

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

Answer:

Xintian has not been subjected to any direct or indirect price guidance or control by the GOC during the investigation period, with respect to domestic steel prices.

- b) Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of China during the investigation period, with respect to raw material inputs (i.e. iron ore, coal, billet, cold-rolled stainless steel, etc.).

Answer:

Xintian has not been subjected to any direct or indirect price guidance or control by the GOC during the investigation period, with respect to raw material inputs.

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

Answer:

Xintian has not encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.

11. Adding capacity and/or joint ventures

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

Answer:

Not applicable, since Xintian did not make such adding capacity and/or joint ventures concerning stainless steel sinks in recent years, Xintian is unable to provide requested specific information.

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

Answer:

Not applicable, since Xintian did not make such adding capacity and/or joint ventures concerning stainless steel sinks in recent years, Xintian is unable to provide requested specific information.

SECTION I - COUNTERVAILING (SUBSIDISATION)

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

INVESTIGATED PROGRAMS

The following are programs that the Commission is currently investigating:

Program Number	Program Name	Program Type
Program 1	Raw Materials Provided by the Government at Less than Fair Market Value	Provision of goods
Program 2	Research & Development (R&D) Assistance Grant	Grant
Program 3	Grants for Export Activities	Grant
Program 4	Allowance to pay loan interest	Grant
Program 5	International Market Fund for Export Companies	Grant
Program 6	International Market Fund for Small and Medium-sized Export Companies	Grant
Program 7	Reduced tax rate for productive FIEs scheduled to operate for a period not less than 10 years	Income Tax
Program 8	Tax preference available to companies that operate at a small profit	Income Tax

Please answer the questions within parts I-1 to I-3 in relation to these programs.

NON-CONFIDENTIAL VERSION

PART I-1 PREFERENTIAL INCOME TAX PROGRAMS (PROGRAMS 7 AND 8)

1. Did your business or any company/entity related to your business receive any benefit⁴ under the following two programs during the investigation period (1 January to 31 December 2013):

- **Program 7** - Reduced tax rate for productive FIEs scheduled to operate for a period not less than 10 years

Answer:

Not applicable as Xintian is not an enterprise with foreign investment.

- **Program 8** - Tax preference available to companies that operate at a small profit

Answer:

Not applicable as Xintian is not a company operate at a small profit. Xintian pays the income tax at the normal rate of 25%.

2. It is our understanding that the general tax rate for enterprises in China from 1 July 2010 was 25%. Confirm whether this is correct and if not, please identify the general tax rate for enterprises in China from 1 July 2010, indicating any changes in the taxation rate over the period July 2010 – December 2103.

Answer:

Yes, the general tax rate is 25%.

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

Answer:

Not applicable, as Xintian pays income tax at rate of 25%.

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

Answer: Not applicable.

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

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

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

NON-CONFIDENTIAL VERSION

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

NON-CONFIDENTIAL VERSION

Answer: Not applicable.

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

Answer: Not applicable.

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

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

Answer: Not applicable.

17. For each taxation year from 2011 to 2013, complete the "Income Tax" spreadsheet in the *Exporter Questionnaire spreadsheets – sinks* workbook.

Answer:

Please refer to Exhibit I-1 for the Income Tax Spreadsheet.

18. Provide a copy, bearing the official stamp of the appropriate level of the Government of China of all
- corporate income tax acknowledgement form(s) and the income tax return(s) that your company filed for the 2011, 2012 and 2013 tax years; and
 - income tax instalment payment receipts, and all applicable income tax forms and schedules for the 2011, 2012 and 2013 tax years.

Answer:

Please refer to Exhibit I-2 for the income tax returns and income tax installment payment receipts. Please note that the 2013 income tax declaration has not finished, we will provide the 2013 income tax returns when it is available.

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

PART I-2 GRANTS (PROGRAMS 2, 3, 4, 5 AND 6)

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

- **Program 2** - Research & Development (R&D) Assistance Grant
- **Program 3** - Grants for Export Activities
- **Program 4** - Allowance to pay loan interest

NON-CONFIDENTIAL VERSION

- **Program 5** - International Market Fund for Export Companies
- **Program 6** - International Market Fund for Small and Medium-sized Export Companies

Answer:

As Xintian did not receive any benefits under the program 2-6, so the following questions from 1 to 17 are not applicable to Xintian.

1. Did your business or any company/entity related to your business receive any benefit under the above programs during the period **1 January to 31 December 2013**?

Answer:

Not applicable, as Xintian did not receive benefit under the above programs.

2. Did your business receive benefits under any other grant (including awards, prizes, funds) program during the period 1 January to 31 December 2013?

Answer:

Not applicable, as Xintian did not receive benefit under any other grant.

For each program identified in your answer to I-2.1 and I-2.2 above, answer the following.

3. Provide complete details involving the amount of the grant received, including whether the grant was received in a lump sum or multiple instalments.

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

NON-CONFIDENTIAL VERSION

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

NON-CONFIDENTIAL VERSION

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

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

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

15. Identify the body responsible for administering the grant.

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

16. Identify the date of approval of the grant and the date the grant was received.

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

17. Indicate where the grant was accounted for on your business' financial statements.

Answer:

Not applicable, as Xintian did not receive benefit under any grant.

PART I-3 PROVISION OF COLD-ROLLED STAINLESS STEEL (PROGRAM 1)

The applicant claims that public bodies (in the form of state-owned or invested enterprises (SIEs)) are supplying cold-rolled stainless steel, directly or indirectly, to manufacturers of deep drawn stainless steel sinks at less than fair value.

In this questionnaire, the term cold-rolled stainless steel refers to both coil or sheets.

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

In relation to this program, provide the following information.

1. Did your business or any company/entity related to your business receive any benefit under the above program during the period **1 January to 31 December 2013**.

Answer:

Xintian did not receive any benefit under the above program during the period 1 January to 31 December 2013.

2. Does your business purchase any goods/services from SIEs, e.g., raw materials (including cold-rolled stainless steel), energy, water, other utilities, etc?

NON-CONFIDENTIAL VERSION

Answer:

Xintian buys electricity and water from SIEs at market prices.

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

Answer:

Please refer to Exhibit G-5 for list of suppliers of main raw material.

4. Complete the 'Steel purchases' spreadsheet in the *Exporter Questionnaire spreadsheets – sinks*.

Provide this data on a **transaction-by-transaction basis, for all purchases of cold-rolled stainless steel** during the period **1 January to 31 December 2013**. This data should be provided for all purchases, not only those of Chinese origin (i.e. include imported materials as well).

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

Answer:

Please refer to the Exhibit I-3 Steel purchases Spreadsheet.

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

Answer:

Xintian did not receive any reduction/reduced price for the purchase of these goods/services during the investigation period.

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

Answer: Not applicable

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

Answer:

Not applicable as Xintian did not purchase imported cold-rolled stainless steel.

PART I-4 ANY OTHER PROGRAMS

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

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

NON-CONFIDENTIAL VERSION

This may have included:

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

Answer:

As Xintian did not receive benefit under any other program. The following questions from 1 to 11 are not applicable to Xintian.

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

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

NON-CONFIDENTIAL VERSION

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

Answer: Not applicable.

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

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

Answer: Not applicable.



SECTION J - EXPORTER'S DECLARATION

Answer:

Please refer to Exhibit J-1.

SECTION K - 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	√
Section G – costing information	√
Section H – particular market situation	√
Section I – countervailing (subsidisation)	√
Section J - declaration	√

Electronic Data	Please tick if you have provided spreadsheet
INCOME STATEMENT	√
TURNOVER – sales summary	√
AUSTRALIAN SALES – list of sales to Australia	N/A
DOMESTIC SALES – list of all domestic sales of like goods	√
THIRD COUNTRY – third country sales	N/A
PRODUCTION – production figures	√
DOMESTIC CTMS – costs of goods sold domestically	√
AUSTRALIAN CTMS – costs of goods sold to Australia	√
INCOME TAX – tax paid by your business for tax years 2011 to 2013	√
STEEL PURCHASES – data for all cold-rolled stainless steel purchased during the investigation period	√

LIST OF EXHIBITS

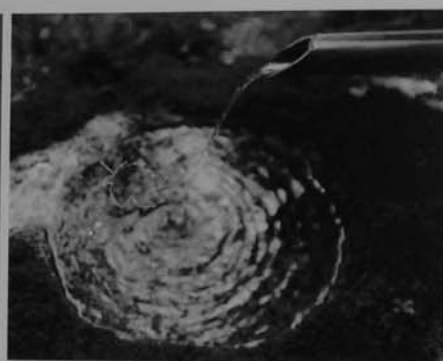
- Exhibit A-1 Internal Organization Chart (CONFIDENTIAL)
- Exhibit A-2 Products Brochure (PUBLIC)
- Exhibit A-3 Chart of Accounts (CONFIDENTIAL)
- Exhibit A-4 2012, 2013 Audited Reports (CONFIDENTIAL)
- Exhibit A-5 Monthly Financial Reports during the Investigation Period (CONFIDENTIAL)
- Exhibit A-6 Income Statement Spreadsheet (CONFIDENTIAL)
- Exhibit A-7 Turnover Spreadsheet (CONFIDENTIAL)
- Exhibit C-1 Models Sold in Domestic Market (CONFIDENTIAL)
- Exhibit D-1 Domestic Sales Spreadsheet (CONFIDENTIAL)
- Exhibit D-2 Sample Domestic Sales Documentation Package (CONFIDENTIAL)
- Exhibit E-1 Expenses Calculation Spreadsheet (CONFIDENTIAL)
- Exhibit G-1 Production Flowchart (CONFIDENTIAL)
- Exhibit G-2 Production Spreadsheet (CONFIDENTIAL)
- Exhibit G-3 Domestic CTMS Spreadsheet (CONFIDENTIAL)
- Exhibit G-4 Australian CTMS Spreadsheet (CONFIDENTIAL)
- Exhibit G-5 List of Suppliers of Main Raw Material (CONFIDENTIAL)
- Exhibit H-1 Business License of Xintian (CONFIDENTIAL)
- Exhibit H-2 Submission to the Bureau of Statistics (CONFIDENTIAL)
- Exhibit I-1 Income Tax Spreadsheet (CONFIDENTIAL)
- Exhibit I-2 Income Tax Returns and Income Tax Installment Payment Receipts (CONFIDENTIAL)
- Exhibit I-3 Steel purchases Spreadsheet. (CONFIDENTIAL)
- Exhibit J-1 Declaration (PUBLIC)

Exhibit A-1 Internal Organization Chart

Exhibit A-1 is Xintian's internal organization chart. It lists Xintian's all internal divisions and departments. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit A-2 Products Brochure

As a focus in the kitchen, the sink operates in about 65% of the time.
It is essential to select a sink characterized by beautiful appearance,
sound performance and easy cleaning so as to
create a comfortable life in the kitchen.



灵动厨房，品尚生活，THE KITCHEN, THE LIVING

水槽是厨房的心脏，厨房生活里面有65%左右的时间会与水槽打交道。
选择一款设计美观、性能良好和清洁方便的水槽，是您打造舒适厨房
生活的关键所在。

Kitchen

Stainless Steel
Sink

柏莱系列 BRIGHT *collection*

DM-V08



(一体拉伸 Monoblock)

Page-82

产品尺寸 Product sizes:

W790 x D485 x H230

开孔尺寸 Cut out size :

W767xD462xR10

DM-V02



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产品尺寸 Product sizes:

W850 x D460 x H215

开孔尺寸 Cut out size :

W828xD438xR10

DM-V05



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产品尺寸 Product sizes:

W790 x D430 x H205

开孔尺寸 Cut out size :

W768xD408xR10

DM-V07



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产品尺寸 Product sizes:

W755 x D425 x H200

开孔尺寸 Cut out size :

W733xD403xR10

DM-V09



(一体拉伸 Monoblock)

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产品尺寸 Product sizes:

W825 x D460 x H200

开孔尺寸 Cut out size :

W803xD438xR10

DM-V21



(一体拉伸 Monoblock)

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产品尺寸 Product sizes:

W500 x D450 x H200

开孔尺寸 Cut out size :

W480xD430xR10

DM-V23



(一体拉伸 Monoblock)

Page-88

产品尺寸 Product sizes:

W850x D500 x H235

开孔尺寸 Cut out size :

W826xD476xR10

摩登系列 MODERN *collection*

DM-V25



(一体拉伸 Monoblock)

Page-90

产品尺寸 Product sizes:

W720 x D430 x H220

开孔尺寸 Cut out size :

W700xD410xR10

DM-V20



(一体拉伸 Monoblock)

Page-91

产品尺寸 Product sizes:

W580 x D430 x H200

开孔尺寸 Cut out size :

W560xD410xR10

DM-V22



(一体拉伸 Monoblock)

Page-92

产品尺寸 Product sizes:

W685 x D440 x H220

开孔尺寸 Cut out size :

W665xD420xR10

DM-V26



(一体拉伸 Monoblock)

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产品尺寸 Product sizes:

W760 x D420 x H220

开孔尺寸 Cut out size :

W740xD400xR10

DM-V27



(一体拉伸 Monoblock)

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产品尺寸 Product sizes:

W825 x D450 x H220

开孔尺寸 Cut out size :

W805xD430xR10

晶雅系列 GRACE collection

DM-V31

Page-96



产品尺寸 Product sizes:

W690 x D420 x H200

开孔尺寸 Cut out size :

W666xD396xR10

DM-V32

Page-97



(一体拉伸 Monoblock)

产品尺寸 Product sizes:

W790 x D430 x H200

开孔尺寸 Cut out size :

W766xD406xR10

DM-V33

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产品尺寸 Product sizes:

W850 x D450 x H220

开孔尺寸 Cut out size :

W826xD426xR10

乐怡系列 LLOYD collection

DM-V41

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(一体拉伸 Monoblock)

产品尺寸 Product sizes:

W760 x D440 x H225

开孔尺寸 Cut out size :

W740xD420xR10

DM-V42

Page-101



(一体拉伸 Monoblock)

产品尺寸 Product sizes:

W750 x D460 x H220

开孔尺寸 Cut out size :

W730xD440xR10

DM-V43

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(一体拉伸 Monoblock)

产品尺寸 Product sizes:

W850 x D460 x H230

开孔尺寸 Cut out size :

W830xD440xR10

爵世系列 ESQUNALE collection

DM-V51

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(一体拉伸 Monoblock)

产品尺寸 Product sizes:

W760 x D470 x H220

开孔尺寸: 配开孔板

DM-V52

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(一体拉伸 Monoblock)

产品尺寸 Product sizes:

W800 x D460 x H200

开孔尺寸: 配开孔板

晶钻系列 JEWELCRYS collection

DM-V61

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产品尺寸 Product sizes:

W750 x D460 x H220

开孔尺寸 Cut out size :

W730xD440xR10

DM-V62

Page-110



产品尺寸 Product sizes:

W820 x D480 x H230

开孔尺寸 Cut out size :

W800xD460xR10

Exhibit A-3 Chart of Accounts

Exhibit A-3 is Xintian's chart of accounts. It lists Xintian's all accounting codes. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit A-4 2012, 2013 Audited Reports

Exhibit A-4 is Xintian's financial statements. It contains Xintian's financial and accounting data. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit A-5 Monthly Financial Reports during the Investigation Period

Exhibit A-5 is Xintian's monthly financial statements. It contains Xintian's financial and accounting data. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit A-6 Income Statement Spreadsheet

Exhibit A-6 is Xintian's income statement spreadsheet. It contains Xintian's financial and accounting data. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit A-7 Turnover Spreadsheet

Exhibit A-7 is Xintian's turnover spreadsheet. It contains Xintian's financial and accounting data. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit C-1 Models Sold in Domestic Market

Exhibit C-1 contains the description of Models of products Xintian sold in domestic market. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit D-1 Domestic Sales Spreadsheet

Exhibit D-1 is Domestic Sales Spreadsheet. It contains domestic sales prices and clients' information. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit D-2 Sample Domestic Sales Documentation

Package

Exhibit D-2 is Sample Domestic Sales Documentation. It contains Domestic sales prices and client's information. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit E-1 Expenses Calculation Spreadsheet

Exhibit E-1 contains sales revenue and account receivable data of Xintian. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit G-1 Production Flowchart

Exhibit G-1 is production flowchart of drawn stainless steel sink of Xintian. It contains production process and related information. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit G-2 Production Spreadsheet

Exhibit G-2 is production spreadsheet. It contains production output data. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit G-3 Domestic CTMS Spreadsheet

Exhibit G-3 is CTMS spreadsheet of domestic sales models. It contains cost and financial data. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit G-1 Australian CTMS Spreadsheet

Exhibit G-3 is CTMS spreadsheet of Australian sales models. It contains cost and financial data. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit G-5 List of Suppliers of Main Raw Material

Exhibit G-5 is list of suppliers of Main Raw Material Cold rolled steel plate of Xintian. It contains supplier's information. This information is considered by Xintian to be proprietary information and its release could Compromise Xintian's competitive position in the market place.

Exhibit H-1 Business License of Xintian

Exhibit H-1 is Xintian's Business License. It contains the registration information of Xintian. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit H-2 Submission to the Bureau of Statistics

Exhibit H-2 is a form filed by Xintian to Bureau of Statistics. It contains the operation and accounting data of Xintian. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit I-1 Income Tax Spreadsheet

Exhibit I-1 is the Income Tax Spreadsheet of Xintian. It contains the accounting data of Xintian. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit I-2 Income Tax Returns and Income Tax Installment Payment Receipts

Exhibit I-2 includes the income tax returns of 2011 and 2012 and Installment Payment Receipts in 2011 to 2013. It contains the accounting data of Xintian. This information is considered by Xintian to be proprietary information and its release could compromise Xintian's competitive position in the market place.

Exhibit I-3 Steel purchases Spreadsheet

Exhibit I-3 is the purchases spreadsheet of Main Raw Material Cold rolled steel plate of Xintian. It contains raw material purchase price and supplier's information. This information is considered by Xintian to be proprietary information and its release could Compromise Xintian's competitive position in the market place.

Declaration

I hereby declare that **Zhongshan Xintian Hardware Co., Ltd**, a producer of goods under consideration, supplied goods under consideration to exporter Komodo HK Limited & Guangzhou Komodo Kitchen Technology Co., Ltd during the period of investigation and have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

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

Name : Liang Zhicong

Signature : 

Position in

Company : General Manager

Date : May 5, 2014