



## Exporter Questionnaire

### Zinc Coated (Galvanised) steel

### Exported from

### The Republic of Vietnam, Malaysia and the Socialist Republic of Vietnam

Period of Investigation: 1 July 2015 to 30 June 2016

Response due by: **13 November 2016 (extended to 20 November)**

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

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#### RETURN OF QUESTIONNAIRE DETAILS

**Preferably by email to:** [operations5@adcommission.gov.au](mailto:operations5@adcommission.gov.au)

**Or by mail  
(CD-ROM or USB):**

Director Operations 5  
Anti-Dumping Commission  
SAP House, Level 4, 224 Bunda Street  
Canberra ACT 2600  
Australia

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## GOODS UNDER CONSIDERATION

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

*Flat rolled iron or steel goods (whether or not containing alloys) that are plated or coated with zinc. The goods are also generically described as galvanised steel. Galvanised steel of any width is included in this application.*

*The amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m<sup>2</sup>) with the prefix being Z (Zinc) or ZF (Zinc converted to a Zinc/Iron alloy coating). The common coating masses used for zinc coating are: Z350, Z275, Z200/Z180, Z100, and for zinc/iron alloy coatings are ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.*

*Surface treatments can include but not be limited to; passivated or not passivated (often referred to as chromated or unchromated), oiled or not oiled, skin passed or not skin passed, phosphated or not phosphated (for zinc iron alloy coated steel only).*

*Trade or further generic names often used to describe the goods the subject of the application include:*

*“GALVABOND®” steel*

*“ZINCFORM®” steel*

*“GALVASPAN®” steel*

*“ZINCHITEN®” steel*

*“ZINCANNEAL” steel*

*“ZINCSEAL” steel*

*Galv*

*GI*

*Hot Dip Zinc coated steel*

*Hot Dip Zinc/Iron alloy coated steel*

*Galvanneal*

*There are a number of relevant International Standards for zinc coated goods that cover BlueScope’s goods, including the recommended or guaranteed properties of each of these grades.*

*Relevant International Standards for galvanised steel are set out below:*

International Standards	Product Grade Names
<b>General and Commercial Grades</b>	
AS/NZS 1397	G1, G2
ASTM A 653/A 653M	CS type A, B and C
EN10346	DX51D, DX52D
JIS 3302	SGCC, SGHC
<b>Forming, Pressing &amp; Drawing Grades</b>	
AS/NZS 1397	G3
ASTM A 653/A 653M	FS, DS type A and B
EN10346	DX53D, DX54D
JIS 3302	SGCD, SGCDL
<b>Structural Grades</b>	
AS/NZS 1397	G250, G300, G350, G450, G500, G550
ASTM A 653/A 653M	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)
EN10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3302	SGC340, SGC400, SGC440, SGC490, SGC570 SGH340, SGH400, SGH440, SGH490, SGH570

### Exclusion

*Painted galvanised steel, pre-painted galvanised steel, electro-galvanised steel, corrugated galvanised steel or aluminium zinc alloy coated or plated steel are excluded from the application.*

### Tariff classification (Schedule 3 of the Customs Tariff Act 1995)

Tariff code	Statistical code	Unit	Description
7210.49.00	55, 56, 57 and 58	Tonne	Flat-rolled products of iron or non-alloy steel, of width of 600mm or more, clad, plated or coated.
7212.30.00	61	Tonne	Flat-rolled products of iron or non-alloy steel, of a width of less than 600mm, clad, plated or steel coated. Otherwise plated or coated with zinc
7225.92.00	38	Tonne	Flat-rolled products of other alloy steel, of a width of 600mm or more. Otherwise plated or coated with zinc
7226.99.00	71	Tonne	Flat-rolled products of other alloy steel, of a width of less than 600mm

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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:*

Name: *Mr. Dylan Kuo*  
Position in the company: *Section manager of Sales department*  
Address: *9F, Petroland, No.12, Tan Trao, Ward Tan Phu, District 7, HCMC, Vietnam*  
Telephone: *+84 – (0)8 – 5416-1035 (Ext: 119)*  
Facsimile number: *+84 –(0)8 – 5416-1030*  
E-mail address of contact person: [\*169573@csvc.com.vn\*](mailto:169573@csvc.com.vn)

*Factory:*

Address: *My Xuan A2 Industrial Zone, My Xuan Commune, Tan Thanh District, Ba Ria – Vung Tau Province, Vietnam*  
Telephone: *+84-64-393-1168*  
Facsimile number: *+84-64-3932188*  
E-mail address of contact person: [\*169573@csvc.com.vn\*](mailto:169573@csvc.com.vn)

### 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. John Bracic*  
Address: *J.Bracic & Associates  
PO Box 3026, Manuka, ACT 2603*  
Telephone: *+61 499 056 729*  
Facsimile/Telex number:  
E-mail address of contact person: [\*john@jbracic.com.au\*](mailto:john@jbracic.com.au)

*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.

*Legal name: CHINA STEEL SUMIKIN VIETNAM JOINT STOCK COMPANY (CSVC).*

*Kind of entity CSVC is a joint stock company, and a wholly foreign owned enterprise.*

*CSVC has no other business names.*

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).

<i>No.</i>	<i>Shareholder name</i>	<i>Percentage of shares in CSVC</i>
<i>1</i>		%
<i>2</i>		%
<i>3</i>		%
<i>4</i>		%
<i>5</i>		%
<i>6</i>		%

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

*CSVC is a subsidiary of CSC.*

*CSC is a publicly traded company and listed in the Taiwan Stock Exchange. As such, the holding of each shareholder may vary by trading in the stock market.*

*Based on the shareholders' roster dated June 30, 2016, only one shareholder owns more than 5% of CSC's shares as indicated below.*

Name of shareholder	Percentage of shareholding	Activity of shareholder
	%	

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

*Inapplicable. The parent company of CSVC is not a subsidiary of another company.*

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

*Please refer to **Exhibit A-3.5** for the affiliated companies of CSVC.*

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

[REDACTED]

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

*CSVC is a producer of high-class steel products, including Pickled and Oiled Steel Coils (PO), As Cold-Rolled Steel Sheets ("ASCR"), Cold-Rolled Steel Sheets ("CR"), Hot-dipped Galvanized/Galvannealed Coils (GI/GA), and Electrical Steel Coils ("ES").*

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.

*Not applicable. CSVC produces and sells the goods in domestic market and to Australia and other countries.*

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

*CSVC is organized into 3 divisions and 15 departments, which are structured based on functions. Please refer to **Exhibit A-3.9** for the Internal Organization Chart.*

[REDACTED]

[REDACTED]

[REDACTED]

*[Confidential operational and reporting structure]*

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

*Please refer to*

*Exhibit A-3.10 (a) CSVC's Audited Financial Statement of 2015,*

*Exhibit A-3.10 (b) CSVC Company Brochure, and*

*Exhibit A-3.10 (c) Galvanized Product Brochure.*

#### **A-4 General accounting/administration information**

1. Indicate your accounting period.

*Our normal corporate financial accounting period is calendar year (from January 1st to December 31st).*

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

*The accounting records are kept at My Xuan A2 Industrial Zone, My Xuan Commune, Tan Thanh District, Ba Ria – Vung Tau Province, Vietnam.*

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;

*Please refer to **Exhibit A- 4.3(a)** for the chart of accounts of CSVC.*

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

*Please refer to:*

- ***Exhibit A-4.3(b)** for CSVC's audited unconsolidated financial statements for 2015 ; and*
- ***Exhibit A-4.3(c)** for CSVC's audited unconsolidated financial statements for 2014.*

- 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.

*CSVc's internal income statements for 2014, 2015 and the first half of 2015 and 2016 are provided in **Exhibit A-4.3(d)**.*

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.



*CSV C has no divisional, factory/facility or product-specific income statements. All the documents relate to the company as a whole.*

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.

*CSV C has audited financial statements, so this question is not applicable.*

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

*Not applicable. CSV C accounting practices are consistent with the generally accepted accounting principles in Vietnam.*

6. Describe:

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

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

*CSV C uses the weighted average method to value the inventory of raw materials, work-in-process, and finished goods in its cost accounting and financial accounting processes.*

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

*In CSV C's ordinary cost accounting system, costs are tracked and cumulated at cost centers on an aggregate, actual basis and by the processing cost method. In other words, one average cost for the product produced at a given cost center. When one product is introduced as input to the production of another product, the input cost is the average production cost of the upstream product. Within a product group, CSV C does not calculate or maintain detailed cost for different specifications or types.*

*When a direct cost center is involved with more than one product, its total costs (including its own costs and the costs allocated from indirect cost centers) would be allocated to the different products produced at that cost center by the output quantity of each product.*

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

*Damaged goods or sub-standard goods are treated as deduction of the current input cost by their recovery value. The recovery values are set at a standard cost based on the selling prices.*

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

*There is no by-product or joint product generated in the production of the subject goods.*

*In the production process of the goods (GI/GA), in addition to prime goods, the following products would be generated from the process:*

- [REDACTED]
- [REDACTED]
- [REDACTED]

*The valuation methods are as below:*

- [REDACTED]
- [REDACTED]
- [REDACTED]

*[Confidential financial accounting information]*

- valuation and revaluation methods for fixed assets;

*The costs of purchased fixed assets comprise their purchase prices and any directly attributable costs of bringing the assets to their working condition and location for their intended use.*

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

*Depreciation is calculated by the straight-line method over the estimated useful lives of equipment / assets ranged as follows:*

	Years
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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

*Non-derivative foreign-currency transactions arising in foreign currencies are translated at exchange rates ruling at the transaction date*

*Exchange differences arising from the translation of these accounts are recognized as financial income or expense in the income statement.*

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

*At the balance sheet date, foreign-currency monetary assets and liabilities are re-valued using prevailing exchange rates on the same date and the exchange differences are recognized in the income statement.*

- inclusion of general expenses and/or interest;

*CSVC does not capitalize general and administrative expenses.*

*Interest expenses incurred during the construction and acquisition period are capitalized as cost of the property.*

- provisions for bad or doubtful debts;

*An allowance for doubtful accounts is provided on the basis of a review of the collectability of accounts receivable. CSVC assesses the probability of collections of accounts receivable by examining the aging analysis of the outstanding receivables and economic conditions provided by customers.*

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

*Not applicable, as this expense does not occur to CSVC.*

- costs of plant closure;

*Not applicable, as CSVC did not close its facility.*

- restructuring costs;

*Not applicable, as CSVC did not incur any restructuring costs.*

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

*There is no by-product generated in the production of the goods.*

*Scraps valued at a standard cost (based on sales value) are subtracted from the total cost of manufacturing.*

- effects of inflation on financial statement information.

*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.

*There was no change in accounting methods over the last two financial years.*

*As for applicability of the new guideline regarding the preparation of financial statements, please see Note 3 of CSVC's 2015 unconsolidated financial statements (**Exhibit A-4.3(b)**), at page 9.*

## A-5 Income statement

Please fill in the following table. It 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.

	Most recent completed financial year (specify)		Investigation period	
	All products	Goods Under Consideration	All products	Goods Under Consideration
<b>Gross Sales (1)</b>				
Sales returns, rebates and discounts (2)				
<b>Net Sales (3=1-2)</b>				
Raw materials (4)				
Direct Labour (5)				
Depreciation (6)				
Manufacturing overheads (7)				
Other operating expenses (8)				
<b>Total cost to make (9=4+5+6+7+8)</b>				
<b>OPERATING INCOME (10=3-9)</b>				
Selling expenses (11)				
Administrative & general expenses (12)				
Financial expenses (13)				
<b>SG&amp;A expenses (14)=(11+12+13)</b>				
<b>INCOME FROM NORMAL ACTIVITIES (15)=(10-14)</b>				
Interest income (16)				
Interest expense (enter as negative) (17)				
Extraordinary gains and Losses – enter losses as negative (18)				
Abnormal gains and losses – enter losses as negative (19)				
<b>PROFIT BEFORE TAX (20)=(15+16+17+18+19)</b>				
Tax (21)				
<b>NET PROFIT (22)=(20-21)</b>				

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

Prepare this information on a spreadsheet named "**A-5 Income statement**".

*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.*

*Please see Exhibit A-5 for CSVC's income statement spreadsheet.*

## A-6 Sales

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, in the following format:

	Most recent completed financial year (specify)		Investigation period	
	Volume	Value	Volume	Value
Total company turnover <b>(all products)</b>				
Domestic market				
Exports to Australia				
Exports to Other Countries				
Turnover of the nearest business unit, for which financial statements are prepared, which includes the goods under consideration				
Domestic market				
Exports to Australia				
Exports to Other Countries				
Turnover of the <b>goods under consideration</b>				
Domestic market				
Exports to Australia				
Exports to Other Countries				

Prepare this information in a spreadsheet named "**A-6 TURNOVER**".

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

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

*Please see Exhibit A-6 for CSVC's 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.*

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

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

*the sale date is not the invoice date (see 'date of sale' column in question B4 below) and;*

*an alternative date should be used when comparing export and domestic prices*

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

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

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

*a)*

[REDACTED]

*b)*

[REDACTED]

*c)*

[REDACTED]

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

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

*The goods are sold to the customers stated in B1 on [REDACTED] basis, and*

- (b) Identify each party in the distribution chain and describe the functions performed by them. Where commissions are paid indicate whether it is a pre or post exportation expense having regard to the date of sale.

*During the POI, with respect to sales to Australia, CSVC has*

*[Confidential terms of export]*

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

*At each stage of the distribution chain stated above,*

*[Confidential terms of export]*

- (d) Describe any agency or distributor agreements or other contracts entered into in relation to the Australian market (supply copy of the agreement if possible).

*[REDACTED] relating to the Australian market during the POI.*

- (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.

[Confidential details of price negotiation and price setting]

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

[Confidential details of exportation]

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

[Confidential details of exportations]

- 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.

[Confidential details of export pricing]

- B-4** Prepare a spreadsheet named “**B-4 Australian sales**” listing all shipments (i.e. transaction by transaction) to Australia of the goods under consideration in the investigation period. You must provide this list in electronic format. Include the following export related information:

Column heading	Explanation
Customer name	names of your customers
Level of trade	the level of trade of your customers in Australia
Model/grade/type	commercial model/grade or type
Product code	code used in your records for the model/grade/type identified. Explain the product codes in your submission.
Grade	Reports the steel grade of Galvanised steel. The steel grade determines the guaranteed or typical mechanical properties of the product. The Australian standard AS 1397 range of steel grades are noted in bold with the equivalent Japanese standard JIS 3302 steel grades noted alongside unbolded.
Base Steel (hot rolled or cold rolled)	Whether the galvanised steel substrate is a hot rolled base or whether it is a cold rolled base (i.e. hot rolled further processed via pickling, side trimming and cold reduction).
Hot Dipped	The type of zinc coating on the steel surface. This is either a hot dipped



coating type	coating of zinc or a coating of zinc that has been converted to a zinc/iron alloy post the hot dip process (excludes electro galvanised steel). The common term for zinc/iron alloy galvanised steel is Galvanneal for this product.
Coating mass (weight)	The amount of zinc (Z) or zinc/iron (ZF) coating that has been applied to the base steel. This is expressed as the total (both top and bottom sides) in grams/square metre of surface area. The designated coating mass is a guaranteed minimum value. Note: JIS 3302 expresses coating mass in a shortened manner compared to AS 1397 (i.e. AS 1397 coating of Z275 (g/m2) = Z27 in the JIS 3302 standard and AS 1397 coating of ZF100 (g/m2) = F10 in the JIS 3302 standard).
Thickness (BMT)	The Base Metal Thickness (BMT) of the substrate steel before the zinc coating or the zinc/iron coating is applied. For galvanised steel of the same coating mass, the thinner the base metal, the more square metres per tonne and therefore more coating metal is required to be applied and higher the cost and selling price.
Width	The width of the galvanised steel. In general narrow steel product requires extra processing via a slitting operation and incurs a price extra.
Form (Coil or Sheet)	The final shape of the galvanised steel - either in coil form or in sheet form. Sheeted product requires extra processing via a shearing operation and incurs a price extra
Prime / Non Prime	Whether the product is prime or non-prime (secondary) product. Non-prime could also be described as not meeting the intended or applicable specification.
Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale, report that date. For example, order confirmation, contract, or purchase order date.
Order number	if applicable, show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Shipping terms	Delivery terms e.g. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	agreed payment terms e.g. 60 days=60 etc.
Quantity	Quantity in units shown on the invoice. Show basis e.g. kg.
Gross invoice value	gross invoice value shown on invoice <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*	<b>any other</b> 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.

*Please see Exhibit B-4 for "Australian Sales" spreadsheet.*

*For product coding information, please refer to Section C.*

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

*If these exist, they have been reported as instructed.*

**B-6** For each type of discount, rebate, and 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.

*[Confidential details of exportations]*

- 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.

*[Confidential details of exportations]*

- B-8** If the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert additional columns in the

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)

spreadsheet for all other costs incurred. For example:

*Not applicable. For all Australian sales during the POI, the delivery term was*

- 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.

*Please see Exhibits B-9(a) and B-9(b) for documentation relating to the following two selected shipments to Australia.*

- Invoice number ; and

- Invoice number [REDACTED]

*[Confidential sales accounting details]*

## 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.

*CSVC exported the goods to Australia during the POI.*

*The specifications of the goods exported to Australia are listed as following:*

	[REDACTED]	
	[REDACTED]	
	[REDACTED]	

- 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).

*The goods exported to Australia are clearly identified by the model numbers shown in the Australian sales spreadsheet set out in **Exhibit B-4**.*

*For column "Model", CSVC assigned the control number in order to properly demonstrate the likeness and similarity among various galvanized products which were sold in Australian and domestic market. The model control numbers consist of 4 parameters, quality for specifications, base material, coating metal, and coating weight, as further explained below:*

Description of field	Explanation	Length of field
<div style="border: 1px solid black; padding: 5px;"> XXXXXXXXXX  XXXXXXXXXX  XXXX </div>	XXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXX	2

Description of field	Explanation	Length of field
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XXXXXXXXXX	XXXXXXXXXX XXXXXXXXXX	X
XXXXXX XXXXXX XXXXXX	XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXX	X
XXXXXX XXXXXX	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXX	X

Description of field	Explanation	Length of field
	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
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	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	

*The comparison between export prices and domestic prices can thus be carried out on the basis of identifying the same model numbers of domestic sales.*

- C-3** If you sell like goods on the domestic market, for each type that your company has exported to Australia during the investigation period, list the most comparable model(s) sold domestically; and

provide a detailed explanation of the differences where those goods sold domestically (i.e. the like goods – see explanation in glossary) are not identical to goods exported to Australia.

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

*CSC has identified exactly the same goods as defined by the model numbers assigned to the export sales, and reported only those sales in its domestic sales spread sheet at **Exhibit D-4**.*

- 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.

*Please see **Exhibit C-4** for two example mill certificates for domestic sales.*



## 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 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;

*CSVC sells the goods in the domestic market mainly via* [REDACTED]

- [REDACTED]
- [REDACTED]

*Please see **Exhibit D-1** for a chart showing distribution channels and indicating delivery and payment terms.*

- information concerning the functions/activities performed by each party in the distribution chain; and

[REDACTED]

[REDACTED]

*[Confidential domestic selling terms]*



- a copy of any agency or distributor agreements, or contracts entered into.

[REDACTED]

*[Confidential domestic selling terms]*

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.

*In the domestic market, CSVC sold the goods to [REDACTED] during the POI, i.e.,*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*The related domestic customers which purchased galvanised steel products for resale either directly or after shearing/slitting.*

*C SVC's terms of sale and prices do not vary as between affiliated and unaffiliated customers.*

- 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.

[REDACTED]

*[Confidential domestic selling terms]*

- 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

*C SVC uses* [REDACTED]

[REDACTED]

[REDACTED]

*[Confidential domestic selling terms]*

*The sales process is initiated by way of CSVC issuing a quotation to its customers, indicating the quantity and base price. If the customer confirms the quotation, it would send order contracts to CSVC, including products, specifications, and dimensions by fax or email. CSVC then begins to process the internal sales orders.*

*Once production is finished and the relevant goods are ready for delivery, CSVC notifies its customer, and a shipping notice will be issued. When the product is shipped, CSVC issues its invoice – in the form of the standard VAT Invoice, to its customer.*

*Please see **Exhibit D-3(a)** for a flowchart setting out the sales process for domestic market.*

- whether price includes the cost of delivery to customer.

*If the customer requires CSVC to arrange delivery, CSVC adds the freight to the goods value and the total value would then be shown on the invoice.*

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

*As explained above,*

**[Confidential domestic selling terms]**

- D-4** Prepare a spreadsheet named “**D-4 Domestic sales**” listing **all** sales of like goods made during the investigation period. The listing must be provided on a CD-ROM. Include all of the following information.

Column heading	Explanation
Customer name	names of your customers. If an English version of the name is not easily produced from your automated systems show a customer code number and in a separate table list each code and name.
Level of trade	the level of trade of your domestic customer
Model/grade/type	commercial model/grade or type of the goods
Product code	code used in your records for the model/grade/type of the goods identified. Explain the product codes in your submission.
Grade	Reports the steel grade of Galvanised steel. The steel grade determines the guaranteed or typical mechanical properties of the product. The Australian standard AS 1397 range of steel grades are noted in bold with the equivalent Japanese standard JIS 3302 steel grades noted alongside unbolded.
Base Steel (hot rolled or cold rolled)	Whether the galvanised steel substrate is a hot rolled base or whether it is a cold rolled base (i.e. hot rolled further processed via pickling, side trimming and cold reduction).
Hot Dipped coating type	The type of zinc coating on the steel surface. This is either a hot dipped coating of zinc or a coating of zinc that has been converted to a zinc/iron alloy post the hot dip process (excludes electro galvanised steel). The common term for zinc/iron alloy galvanised steel is Galvanneal for this product.
Coating mass (weight)	The amount of zinc (Z) or zinc/iron (ZF) coating that has been applied to the base steel. This is expressed as the total (both top and bottom sides) in grams/square metre of surface area. The designated coating mass is a guaranteed minimum value. Note: JIS 3302 expresses coating mass in a

	shortened manner compared to AS 1397 (i.e. AS 1397 coating of Z275 (g/m <sup>2</sup> ) = Z27 in the JIS 3302 standard and AS 1397 coating of ZF100 (g/m <sup>2</sup> ) = F10 in the JIS 3302 standard).
Thickness (BMT)	The Base Metal Thickness (BMT) of the substrate steel before the zinc coating or the zinc/iron coating is applied. For galvanised steel of the same coating mass, the thinner the base metal, the more square metres per tonne and therefore more coating metal is required to be applied and higher the cost and selling price.
Width	The width of the galvanised steel. In general narrow steel product requires extra processing via a slitting operation and incurs a price extra.
Form (Coil or Sheet)	The final shape of the galvanised steel - either in coil form or in sheet form. Sheeted product requires extra processing via a shearing operation and incurs a price extra
Prime / Non Prime	Whether the product is prime or non-prime (secondary) product. Non-prime could also be described as not meeting the intended or applicable specification.
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 e.g. 60 days=60 etc.
Quantity	quantity in units shown on the invoice e.g. 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*	<b>any other</b> 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.

*Please see Exhibit D-4 for CSVc's domestic sales 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.

*There were no other costs, charges, or expenses incurred in respect of the sales listed in Exhibit D-4.*

*(In the time available CSVc has done its best to identify costs, charges or expenses which would need to be considered for adjustment purposes. CSVc reserves the right to present further information before or during the verification process if such information is properly identified.)*

- 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.

*CSVc usually grants the following types of sales adjustments to all domestic market customers:*

<i>Reason Code</i>	<i>Description</i>	<i>Reported in D-4</i>
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

(1) [REDACTED]

[REDACTED]

(2) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- (3) [REDACTED]
- [REDACTED]
- (4) [REDACTED]
- [REDACTED]

*[Confidential domestic selling terms]*

*The above sales adjustments are all reported in Column "Rebate".*

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.

*The sales adjustments as indicated above would follow one original invoice that would have multiple coils. Therefore, the rebate amount of one invoice are allocated to each coil subject to the concerned invoice by value, and are reported in **Exhibit D-4** accordingly.*

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.

*Not applicable.*

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

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

*Please see **Exhibit D-7(a)** and **Exhibit D-7(b)** for domestic sales documentation in relation to these two sales:*

- *invoice number* [REDACTED]; and
- *invoice number* [REDACTED]

## SECTION E

### FAIR COMPARISON

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

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

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

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

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

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

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

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

#### **E-1 Costs associated with export sales**

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

##### **1. Transportation**

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

*CSVC has calculated the inland freight expenses (in VND) by the following two methods:*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*The general ledger account for this expense is "[REDACTED]"*.

**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.

*Terminal handling charge, Seal Fee, B/L fee, and Other expenses (telex release ...) are determined by payment voucher. The general ledger account for these expenses are "[REDACTED]"*.

*As for Port charges, they are reported based on contracts and payment voucher. The general ledger account for port charge is “[REDACTED]”.*

### 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 e.g., short term borrowing in the currency concerned.

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

[REDACTED]

*Please see Exhibit E-1.3 for the list of POI interest rate on US\$ short-term borrowing.*

### 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**’.

*Please see Exhibit E-1.4 for the list material and labour costs associated with packing the export product.*

*With respect to the difference in packing method for export markets and on the domestic market, the packing method for domestic and export products follows [REDACTED]*

[REDACTED]

*[Confidential packing details]*

*Below is the packing cost summary and the calculation detail is provided in Exhibit E-1.4.*

<i>Packing unit price in POI</i>			
<i>Production Type/Line</i>	<i>Unit</i>	<i>Domestic</i>	<i>Export</i>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

### 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.

*CSVC has reported commission incurred in the sales listing provided in **Exhibit B-4**.*



*The general ledger account for this expense is “**[REDACTED]**”*

**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.

*Not applicable, as no warranty expenses were paid in CSVC's export sales to Australia.*

**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.

*Not applicable*

*(In the time available CSVC has done its best to identify costs, charges or expenses which would need to be considered for adjustment purposes. CSVC reserves the right to present further information before or during the verification process if such information is properly identified.)*

**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.

*Not applicable. CSVC does not claim currency conversion adjustment.*

## 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.

*CSVC has identified the same models as those assigned to the export sales and reported the same in its domestic sales spreadsheet at **Exhibit D-4**.*

### 2. Import charges and indirect taxes

If exports to Australia:

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

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

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

Adjustment for drawback is not made in every situation where drawback has been received. Where an adjustment for drawback is appropriate you must provide information showing 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.

*Not applicable, no tax exemption or drawback applies.*

### **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.

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.

*Not applicable. There are no relevant trade level differences and no adjustment is necessary or claimed.*

#### 4. Credit

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

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

- the rate, or average of rates, applying on actual short term borrowings 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 system<sup>1</sup>, the average credit period may be determined as follows:

1. *Calculate an accounts receivable turnover ratio*

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

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

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

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

2. *Calculate the average credit period*

The average credit period equals 365 divided by the accounts receivable turnover ratio determined above at 1.

The resulting average credit period should be tested against randomly selected transactions to support the approximation.

*Credit terms have been identified in CSVC's domestic sales spread sheet.*



*[Confidential borrowing information]*

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

*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.

*CSVC has reported inland transportation costs on an actual basis.*

*The general ledger account is "[REDACTED]".*

**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.

*Not applicable.*

**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**".

*Please see response to E-1.4 above.*

**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.

*Not applicable.*

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

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

*Not applicable*

#### 10. Other factors

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

- *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*.

*Not applicable*

*(In the time available CSVC has done its best to identify costs, charges or expenses which would need to be considered for adjustment purposes. CSVC reserves the right to present further information before or during the verification process if such information is properly identified.)*

### 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.

*Not applicable. No duplication is evident.*



## 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 Using the column names and column descriptions below provide a summary of your export sales to countries other than Australia.**

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 e.g. kg
Value of sales	Show net sales value to all customers in third country over the investigation period
Currency	Currency in which you have expressed data in column SALES
Payment terms	Typical payment terms with customer(s) in the country e.g. 60 days=60 etc.
Shipment terms	Typical shipment terms to customers in the third country e.g. CIF, FOB, ex-factory, DDP etc.

Supply this information in spreadsheet file named "Third country"

*Please see Exhibit F-1.*

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

*There may be a number of differences between CSVCS's sales to Australia and to other third countries which would affect any comparison of them.*

## 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) - i.e. 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 (e.g. 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)*

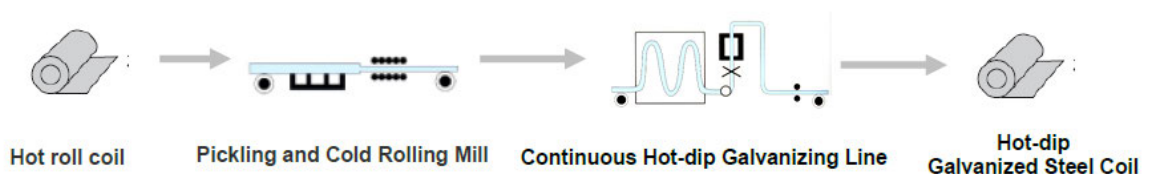
*you must provide cost data over the same period as these sales even if doing so means that such cost data predates the commencement of the investigation period.*

*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.

*Hot-dip galvanized steel coils are produced by using as-cold-rolled steel coil as its base material; the typical manufacturing processes are described as below:*



*CSVC produces its cold rolled products by the combination line of PLTCM (abbreviated from Pickling and Tandem Cold-rolling Mill), and hot-dip galvanized steel coils by Continuous Hot-dip Galvanizing Line (abbreviated as CGL).*

*CSVC does not produce by-products from the production of the goods. In the process of producing the goods, scraps include solid steel scrap, waste galvanized dross and kick-off products.*

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

	PREVIOUS FINANCIAL YEAR (2014)	MOST RECENT FINANCIAL YEAR (2015)	Investigation Period
A – Production capacity (tonnes)*			
B – Actual production in volume (tonnes)			
C – Capacity utilisation (%) (B/A x 100)			

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

Provide this information on a spreadsheet named "**Production**".

*Please see **Exhibit G-2** for CSVC's Production spreadsheet. (Also copied as the above table) The production quantities of the goods reported in **Exhibit G-2** include both prime and secondary products.*

**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.

*CSVC adopts a "processing costing system" in its ordinary cost accounting. CSVC normally accumulates and records actual production costs by a processing cost methodology for the goods.*

*In addition to prime goods, non-prime goods are also an output of the galvanized steel coils production process. The cost of these non-prime plates are determined by standard costs and treated as recovery. The actual production costs incurred, after deducting the recovery value of secondary, salvage, and scraps, are absorbed by the prime-grade output product only.*

*CSVC's cost accounting system is an integral part of its financial accounting system used for the financial statements, and can be reconciled to 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 (i.e. differences between standard and actual production costs) have been allocated to the goods - and describe how those variances have been allocated.

*Not applicable. CSVC does not adopt standard costs.*

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

*This question is not applicable since CSVC did not have any significant or unusual cost variances that occurred during the investigation period.*

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

*In CSVC's cost accounting system, a cost centre is the basic cost collection unit. There are 2 main types of cost centres:*

*- Direct cost centres (or Producing cost centres) are units taking part in producing products directly, converting raw material or semi-finished material into product, which may be for captive use or for sales.*

*- Indirect cost centres that included (1) Administration cost centres and (2) Service cost centres:*

*(1) Administration cost centres are units in charge for controlling, administrating, making plan and supporting production.*

*(2) Service cost centres are units providing maintenance service, utility service, etc. to other cost centres.*

*Costs incurred by indirect cost centres are charged to the recipient cost centres.*

- 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.

*In CSVC's ordinary cost accounting system, costs are tracked and cumulated at cost centres on an aggregate, actual basis and by the processing cost method, i.e., one average cost for the product produced at a given cost centre. When one producing cost centre is involved with more than one product, its total costs (including its own costs and the costs allocated from indirect cost centres) would be allocated based on to the output quantity of the products. When one product is introduced as an input to the production of another product, the input cost is the average production cost of the upstream product. Within a product group, CSVC does not calculate or maintain detailed cost for different specifications or types.*

*The costs captured in service cost centres, including those for water, electricity and maintenance, are allocated to producing cost centres based on the actual consumption of each producing cost centre.*

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

*In CSVC's ordinary cost accounting system, one average cost is recorded for the product produced at a given cost centre, and within such product group, and it maintains production and inventory costs on the basis of product group. In ordinary cost accounting records, CSVC does not calculate costs separately for each specific specification or type of the subject goods (or non-subject goods).*

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

*This question is not applicable as CSVC's cost accounting system is an integral part of its financial accounting system, and the methods for cost and financial accounting purposes are the same. CSVC does not have production costs which are valued differently for cost accounting purposes than for financial accounting.*

- 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.

*Not applicable. CSVC did not engage in any relevant start-up operations relating to the goods during the POI.*

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

*Not applicable.*

#### **G-4 Cost to make and sell on domestic market**

*This information is relevant to testing whether domestic sales are in the ordinary course of trade.<sup>2</sup>*

1. Please provide (in the format shown in the table below) the actual unit cost to make and sell each model/type\* (identified in section C) of the like goods sold on the domestic market. Provide this cost data for each quarter over the investigation period. If your company calculates costs monthly, provide monthly costs.

*Please see Exhibit G-4 for the monthly unit cost of each product model sold on the domestic market during the POI.*

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

	Quarter 1	Quarter 2	Quarter 3	Quarter 4
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<sup>2</sup> 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.

<b>Like Domestic Model/Type – from spreadsheet LIKE GOOD (section C-3)</b>				
Production Volume				
Material Costs <sup>1</sup>				
Thickness (BMT)				
Coating mass (weight)				
Base Steel (hot rolled or cold rolled)				
Form (Coil or Sheet)				
Direct Labour				
Manufacturing Overheads				
Other Costs <sup>2</sup>				
<b>Total Cost to Make</b>				
Selling Costs				
Administration Costs				
Financial Costs				
Delivery Expenses <sup>3</sup>				
Other Costs <sup>3</sup>				
<b>Unit Cost to Make and Sell</b>				

Prepare this information in a spreadsheet named "**G-4 Domestic CTMS**".

<sup>1</sup> Identify each cost separately. Include indirect material costs as a separate item only if not included in manufacturing overheads.

<sup>2</sup> Relating to costs of production only; identify each cost separately.

<sup>3</sup> Identify each cost separately. Please ensure non-operating expenses **that relate to the goods under consideration** are included. Where gains/losses due to foreign currency exchange are incurred, please provide detail of the amounts separately for transaction and translation gains/losses.

*Provide this information for each quarter (or month if your company calculates costs on a monthly basis) over the period of the investigation.*

*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.*

*CSVC calculates production costs monthly. However, as stated above, CSVC does not in its ordinary course of business maintain production costs at a model-specific level.*

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*To report the model-specific costs in this EQ response, CSVC relied on the actual aggregate cost of manufacture on the book, and allocated such aggregate cost to each model produced in the same cost centre based on the following logic. As such, the model-specific costs reported in this response, taken as a whole, will reconcile with the aggregate cost on the book in the financial records.*

[illegible]

The foregoing calculation is done per each month and, as a result, CSVc reported monthly unit cost of each model in the cost files.

### 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.*

	Quarter 1	Quarter 2	Quarter 3	Quarter 4
<b>Model/Type exported to Australia – from spreadsheet LIKEGOOD</b>				
Material Costs <sup>1</sup>				
Thickness (BMT)				
Coating mass (weight)				
Base Steel (hot rolled or cold rolled)				
Form (Coil or Sheet)				
Direct Labour				
Manufacturing Overheads				
Other Costs <sup>2</sup>				
<b>Total Cost to Make</b>				
Selling Costs				
Administration Costs				
Financial Costs				
Delivery Expenses <sup>3</sup>				
Other Costs <sup>3</sup>				
<b>Unit Cost to Make and Sell</b>				

Prepare this information in a spreadsheet named "**G-5 Australian CTMS**".

<sup>1</sup> Identify each cost separately. Include indirect material costs as a separate item only if not included in manufacturing overheads.

<sup>2</sup> Relating to costs of production only; identify each cost separately.

<sup>3</sup> Identify each cost separately. Please ensure non-operating expenses **that relate to the goods** are included. Where gains/losses due to foreign currency exchange are incurred, please provide detail of the amounts separately for transaction and translation gains/losses.

*Provide this information for each quarter (or month if your company calculates costs on a monthly basis) over the period of the investigation.*

*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.*



- 1 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.

*Please see **Exhibit G-5** for the monthly unit cost of each product model exported to Australia during the POI.*

*The goods sold in the domestic market and those sold to Australia have identical costs to make (material, labour and manufacturing overheads).*

*As for selling costs, a worksheet for calculating the ratio of SGA and other expenses is provided in **Exhibit G-5.1**.*

- 2 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.

*Please see the response to G-4.2 above.*

- 3 In calculating the unit cost to make and sell, provide an explanation if the allocation method used (e.g. number, or weight etc.) to determine the unit cost differs from the prior practice of your company.

*Regarding the cost to make, Please see the response to G-4.2 above.*

*For unit cost of SGA and other expenses, except direct selling expenses, CSVC's expense ratio is allocated based on turnover, and the calculation worksheet is provided in **Exhibit G-5-1**.*

## **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 (e.g. 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.**

*The major raw materials are hot-rolled coils and zinc ingot. Please see **Exhibit G-6.1** major raw material purchases summary.*

*In order to answer for request of providing detailed information on full cost of production of input, CSVN provides the full cost of As-cold roll product as **Exhibit G-6.2** Production cost of PLTCM.*

## SECTION H

### SUBSIDISATION

The applicant alleges that producers of galvanised steel in Vietnam have benefited from a number of subsidies granted by the Government of Vietnam (the GOV)<sup>3</sup>, and that these subsidies are countervailable.

#### THE FOLLOWING PROGRAMS ARE BEING INVESTIGATED

Program no.	Program Title
1	Preferential Import Tariff Rates contingent upon Localisation Ratios with respect to products and Parts of Mechanical-Electric-Electronic Industries (updating Program II of Notification of Subsidies period 2003-2004);
2	Support for the Implementation of Projects Manufacturing Priority Industrial Products (Updating Programme III of 2003-2004)
3	Investment Incentives Contingent upon Export Performance For Domestic Businesses (Updating Programme IV of 2003-2004)
4	Other Investment Incentives for Domestic Businesses (Updating Program V of Period 2003-2004)
5	Investment Incentives Contingent upon Export Performance for Foreign Invested Enterprises (Updating Programme VI of the Period 2003-2004)
6	Other Investment Incentives for Foreign Invested Enterprises (Updating Programme VII for Period 2003-2004)
7	Preferential Investment Credit for Development Contingent upon Export Criteria (Updating Programme VIII of Period 2003-2004)
8	Preferential Development Credit for Investment Contingent Upon Localisation Ratios (Updating Programme IX of Period 2003-2004)
9	Other Preferential Investment Credit for Development (Updating Program X of Period 2003-2004)
10	Export Promotion (Updating Program XII of Period 2003-2004)
11	Trade Promotion (Updating of Programme XIII of Period 2003-2004)
12	Support for Mechanical Products (Updating Program XV of Period 2003-2004)
13	Support for Shipbuilding Industry (Updating of Programme XV of Period 2003-2004)
14	Assistance for Commercial Development in Mountainous, Island and Ethnic Minority Areas (Updating Programme XVI of Period 2003-2004)
15	Assistance to Enterprises Facing Difficulties Due to Objective Reasons (Updating of Programme XVII of Period 2003-2004)
16	Incentives for Investment Projects in Science and Technology (Updating Programme XVIII of Period 2003-2004)
<b>Program alleged to have benefited Hoa Sen Steel</b>	

<sup>3</sup> Meaning any level of government – refer to the Glossary of Terms for further information

17	Preferential Import Tariff Rates for enterprises investing in regions or sectors entitled to investment incentives
18	Incentives on corporate income tax for enterprises operating in regions or sectors entitled to incentives
19	Incentives on Non-Agricultural Land Use Tax to encourage enterprises to invest in sectors or regions which require investment

The Commission has categorised the alleged programs into following three categories.

## CATEGORY H-1: PREFERENTIAL TAX PROGRAMS

### Programs 1, 17, 18 and 19

Please complete the following questions a spreadsheet named "**H-1.1 Income Tax Programs**"

- Did your business or any company/entity related to your business receive any benefit<sup>4</sup> under the any of the above tax programs identified above during the investigation period (1 July 2015 to 30 June 2016)?

*Ans:*

*Although CSVC [REDACTED] thus CSVC did not receive any benefit under such program during the investigation period.*

*Our related companies, [REDACTED]*

*[REDACTED] please refer to Exhibit H-1.1-1 Corporate Income Tax Declaration of China Ecotek (2015).*

*Our other related companies, including, [REDACTED]*

*[REDACTED] did not receive any benefit under any of the above programs during the investigation period.*

*[Confidential tax details]*

- It is our understanding that the general tax rate for enterprises in Vietnam between 2011 and 2013 was 25% and from 2014 to current date is 22%. Confirm whether this is correct and if not, please identify the general tax rate for enterprises in Vietnam from 1 July 2011, indicating any changes in the taxation rate over the period July 2011 – June 2016.

*Ans:*

*Pursuant to Article 11 of Circular No.78/2014/TT-BTC dated 18 June 2014, the Corporate Income Tax rate from 1 Jan 2016 onward is 20%. Please refer to Exhibit H-1.1-2 Circular No.78 (Translated version).*

<sup>4</sup> Refer to the Glossary of Terms for a definition of benefit in this context.

3. If your business currently pays corporate income tax at a rate less than 22% (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.

*Ans:*

Not applicable, [REDACTED]

*[Confidential tax details]*

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 5 -18 below in relation to the income tax rate reduction.

*Ans:*

*Not applicable; see our answer to Q.3 above.*

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.

*Ans:*

*Not applicable; see our answer to Q. 3 above.*

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).

*Ans:*

*Not applicable; see our answer to Q. 3 above.*

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

*Ans:*

*Not applicable; see our answer to Q. 3 above.*

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 GOV in relation to the program.

*Ans:*

*Not applicable; see our answer to Q. 3 above.*

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

*Ans:*

*Not applicable; see our answer to Q. 3 above.*

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

*Ans:*

*The eligibility our business had to meet in order to receive benefits under the program is that CSVC is located in area with difficult economic conditions. However, CSVC [REDACTED] so we do not receive any benefit under such program during the investigation period.*

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.

*Ans:*

*d) condition applies to CSVC.*

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.

*Ans:*

*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.

*Ans:*

*Not applicable; see our answer to Q. 3 above.*

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

*Ans:*

*Not applicable; see our answer to Q. 3 above.*

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

*Ans:*

*The program is still operating but not applicable to CSVC [REDACTED]*

16. If the program has been terminated, please provide details (including when and 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?

*Ans:*

*Not applicable; see our answer to Q. 15 above.*

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

*Ans:*

*Not applicable see our answer to Q. 15 above.*

17. For each taxation year from 2011 to 2016, complete the "H1.2 Preferential Tax Program" tab



*Ans:*

*Please refer to Table H-1.2 Preferential Tax Program.*

18. Provide a copy, bearing the official stamp of the appropriate level of the GOV of all
- corporate income tax acknowledgement form(s) and the income tax return(s) that your company filed for the 2011, 2012, 2013, 2014, 2015 and 2016 tax years; and
  - income tax instalment payment receipts, and all applicable income tax forms and schedules for the 2011, 2012, 2013, 2014, 2015 and 2016 tax years.

*Ans:*

*Please refer to Exhibit H-1.1-18(a)~(d) Corporate Income Tax Declaration (2011~2015) and Exhibit H-1.1-18(e)~(f) Bank Receipt (2012~2013) for our tax return of Year 2011, 2012, 2013, 2014 and 2015.*

*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.*

It is our understanding that certain enterprises in Vietnam are eligible for exemption from the payment of import duty on imported inputs, technologies and machinery, and Duty exemption/Remission schemes, credit for Credit for Service Tax Reimbursement on certain resources and goods.

If your business or any company/entity related to your business received benefits under any such program during the period 1 July 2015 to 30 June 2016, please answer the following questions.

For the following questions, please provide responses to questions in the "**H-1.3 Tariff Programs**"

1. Did your company receive any benefit under the programs listed above or any other program related to exemptions/refunds/Duty drawback/Credit etc. for Service Tax paid exemptions or refunds?

*Ans:*

*Under Program No.17, CSVC*

*Our related companies, including*

*, did not receive any benefit under any of the above programs during the investigation period.*

*[Confidential purchasing information]*

2. What type of benefit was received (provide a list):

(a) e.g. Tariff exemption,

*Ans:*

*[REDACTED] received by CSVC is provided in Exhibit H-1.3-17 Import Transaction Detail.*

3. What was the amount of benefit received?

*Ans:*

*Total amount of benefit of [REDACTED] which shall be [REDACTED] for the calculation purpose of this proceeding.*

4. Was the benefit received as a lump sum payment or in multiple instalments?

*Ans:*

*CSVC received the [REDACTED]*

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

*Ans:*

*The relevant enterprise shall submit application form, master list of imported goods and related documents to the Customs Department. After checking all the documents and finding them in order, the Customs Department will approve the application for tariff exemption of those items listed on the master list.*

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 GOV in relation to the program.

*Ans:*

*Please refer to Exhibit H-1.3-6(a)~(c) Application of Duty Exemption and Master List of Imported Goods*

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

*Ans:*

*CSVC paid the [REDACTED] to apply for the tariff exemption benefit under the program.*

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

*Ans:*

*The applicable criterion for CSVC is that it is located in the area with difficult economic conditions and the imported equipment is of the fixed assets nature required in the period of basic construction investment.*

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.

*Ans:*

*d) condition applies to CSVC.*

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.

*Ans:*

*Not applicable.*

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

*Ans:*

*The Master list of imported goods approved by the Customs Department (see Exhibit H-1.3-6(a)~(c) Application of Duty Exemption and Master List of Imported Goods).*

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

*Ans:*

*Because the [REDACTED], it is not required to report in accounting records or financial statements.*

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

*Ans:*

*The program is still operating. However, because CSVC has already finished its Construction Progress Period, CSVC may not be eligible to apply for the same benefit any more.*

14. If the program has been terminated, please provide details (including when and 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?

*Ans:*

*Not applicable; see our answer to Q.13 above.*

15. If the program terminated has been substituted for by another program, identify the program.

*Ans:*

*Not applicable; see our answer to Q.13 above.*

16. Were the materials and/or equipment that were entitled to a refund of VAT /State tax (or any other form of tax) used in the production of the goods during the investigation period? If yes, provide the following information for each item that received a refund:

- (a) type of inputs;
- (b) cost of inputs;
- (c) quantity of inputs; and
- (d) amount of VAT/Sales tax (or any other form of tax) refunded.

*Ans:*

*Not applicable.*

17. Has your company received exemption from payment of or refunds and/or exemption of import duty imported material inputs at any time that were used in the production of the goods during the investigation period? If yes, provide the following information for each transaction:

- (a) description of imported product;
- (b) country of origin;
- (c) quantity of imported product;
- (d) purchase price;
- (e) terms of purchase (e.g. FOB, CIF);
- (f) ocean freight;
- (g) value for duty of imported product;
- (h) regular rate of taxes and/or duties;
- (i) concessionary rate of taxes and/or duties;
- (j) amount of duties and taxes normally applicable;
- (k) amount of duties and taxes paid;
- (l) amount of duties and taxes exempt;
- (m) date of importation;
- (n) tariff classification number;
- (o) customs entry number; and
- (p) application fee.

*Ans:*

*Please refer to Exhibit H-1.3-17 Import Transaction Detail.*

18. Provide sample documents for two items from two different quarters in the investigation period included in your response to Question 17. The sample documents should include:

- (a) copies of import entry documents (for example: bill of entry, invoice from supplier, etc.) for each type of importation covering duty-exempt inputs and duty-paid inputs imported for use in the manufacturing of the subject goods,

*Ans:*

*Please refer to Exhibit H-1.3-18(a)~(n) Shipping Documents.*

- (b) any applications submitted to and/or approval document received from the GOV relating to the exemption from the payment of import duty and exemption of duty on imported inputs and in relation to the duty refunded on the exportation of the subject goods.

*Ans:*

*Please refer to the answer to Q.6 above.*

- (c) copies of reports and audits by the GOV authority responsible for administering the duty rebate or duty drawback scheme with respect to the verification of the importation and use of inputs and the remittance or drawback of the related duty paid or payable.

*Ans:*

*Not applicable.*

## CATEGORY H-2: FINANCIAL GRANT PROGRAMS

### Programs 2-6 and 10-16

The Commission understands that the Government of Vietnam may be providing grants to enterprises in Vietnam including the above programs (as identified by the applicant).

For the following questions, please provide responses to questions in the "H-2 Grants".

1. Did your business or any company/entity related to your business receive any benefit under the above programs during the period **1 July 2011 to 30 June 2016**?

*Ans:*

*Yes, CSVC received benefit under Program No. 16 in 2015.*

*Our related companies, including*

[REDACTED]

*did not receive any benefit under any of the above programs during the investigation period.*

2. Did your business receive benefits under any other grant program during the period **1 July 2011 to 30 June 2016**?

*Ans:*

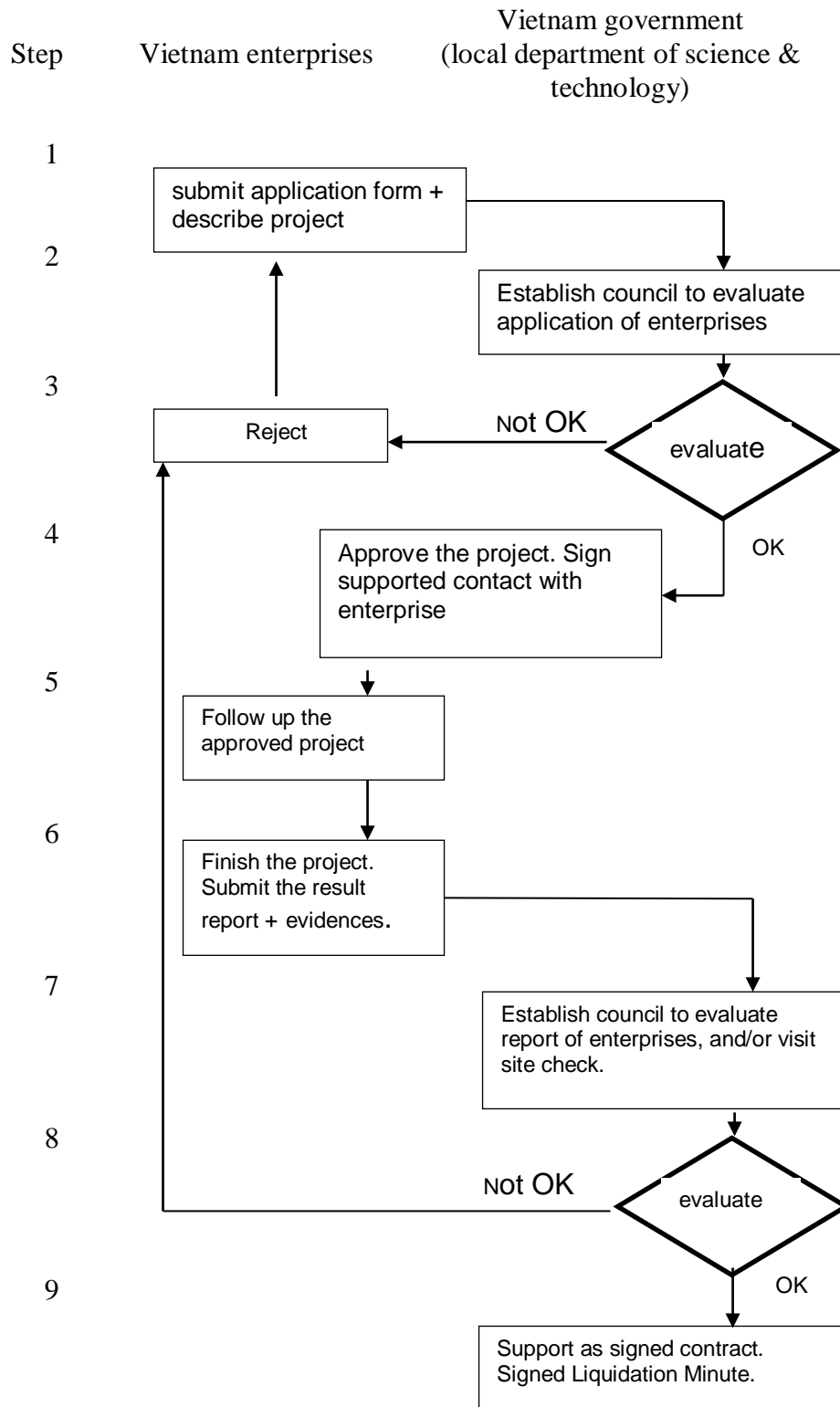
*No, we did not receive benefits under any other grant program during the period 1 July 2011 to 30 June 2016.*

For each program identified in your answer to 1 and 2 above, answer the following questions:

3. Provide complete details involving the amount of the grant received, including whether the grant was received in a lump sum or multiple instalments  
*Ans:*  
*CSVC received [REDACTED] as the first instalment of the grant. The remaining [REDACTED] will be paid in 2016.*
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).  
*Ans:*  
*The grant was made as a reward for CSVC's successfully accredited ISO certifications, which apply to all of CSVC's products*
5. Describe the application and approval procedures for obtaining a benefit under the program.

Ans:

- Pursuant to “On approval of the national program ‘Improving the productivity and quality of products and goods of Vietnam enterprises to year 2020’” which was approved by the Vietnam Prime Minister on May 21, 2010, the decision No. 712/QĐ-TTg., CSVN filed the application on 12/11/2014.
- The application and approval procedures are as follows:



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 Vietnam in relation to the program.

*Ans:*

*Please refer to Exhibit H-2-6(a)~(d) for the Application (2014), Project Description, Signed Contract and Liquidation Minute.*

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

*Ans:*

*There was no fees charged.*

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

*Ans:*

*The applicable criterion for CSVC is because the Company locates in VN, and we have established the projects that improve the productivity and quality of our products.*

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.

*Ans:*

*d) condition applies to CSVC.*

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.

*Ans:*

*CSVC successfully consummates the following projects in 2015:*

- a) Maintain the Quality Management System (QMS) ISO 9001:2008;*
- b) Establish the QMS ISO/TS 16949:2009;*
- c) Establish the QMS ISO/IEC 17025:2005;*
- d) Apply for Product Certificate Mark – SIRIM Mark (Malaysia)*

*Please refer to Exhibit H-2-10(a)~(d) Certificates for the foregoing certifications.*

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.

*Ans:*

*Please refer to the Liquidation Minute of supporting program ISO/IEC 17025 in Exhibit H-2-10(b) ISO IEC 17025 Certificate.*

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

*Ans:*

*The grant was booked in our journal ledger as non-operating gain*

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

*Ans:*

*This program shall expire in 2020. The approved projects of applicants shall be given a pre-specified period to implement and achieve the target, which is specified in the supporting contract between the Government & applicant, and such contract in regard to CSVC is included in Exhibit H-2-6(c) Signed Contract.*

14. If the program has been terminated, please provide details (including when and 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?

*Ans:*

*When the applicant finishes its projects, it shall submit a result report to the government by the deadline specified in the support contract as Exhibit H-2-6(c) Signed Contract. After receiving the report, the government shall establish a council to evaluate the submitted report, and/or to conduct site check. If affirmative, the government & the applicant shall sign a Liquidation Minute to confirm that the supporting contract is expired.*

*CSVC has set the policy to continuously improve productivity and quality of products, so CSVC may submit application to government for supporting benefit every year.*

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part H-2 in relation to this programme.

*Ans:*

*CSVC's application under the concerned projects in 2016 is made based on the following projects:*

- a) Apply for Vietnam Standard Conformity Product Mark – Vietnam Mark;*
- b) Hold Training Course for CSVC's employees to awareness of ISO/TS 16949, improve internal audit skills and 5 cores tool training course. And*
- c) Support surveillance audit fee to maintain QMS ISO 9001, TS 16949, ISO/IEC 17025 & EMS 14001.*

15. Identify the body responsible for administering the grant.

*Ans:*

*The Department of Science & Technology of Ba Ria Vung Tau Province.*

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

*Ans:*

*Date of approval: 25 April 2015*

*Date of grant received: 16 November 2015*

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

*Ans:*

*The grant was booked in our "Other income" account under non-operating gain.*

## CATEGORY H-3: PREFERENTIAL LOANS

### Programs 7, 8 and 9

It is our understanding that certain enterprises in Vietnam benefit from low (subsidised) interest rates from state owned commercial banks (SOCB) and government banks in accordance with the GOV policy to support and develop the expansion of the Vietnamese steel industry.

If your business or any company/entity related to your business received benefits under any such program during the period 1 July 2011 to 30 June 2016, answer the following questions.

1. Provide give a general overview of how your company secures necessary financial resources on the financial market (e.g. Loans, issuance of bonds etc.)

*Ans:*

*CSVC and its related companies, including*

[REDACTED]

*do not receive benefits under the concerned programs in the period of investigation. The following answers are provided for ADC's references and review.*

Provide answers to the following questions in "H-3 Preferential Loans".

2. Provide a list of all the loans provided to your company from banks and financial institutions which have not been fully reimbursed by the end of the investigation period.

*Ans:*

*Please refer to Exhibit H-3-2 List of Loans with all the detailed required.*

3. Provide specific details of the loan, including the start date of the loan, the principal amount of the loan, terms and conditions of the loan, purpose of the loan, the repayment terms/frequency, repayment amount, interest rate, interest type (e.g. fixed, variable etc.), if the loan has been redrawn any time during its duration, please provide the redraw date, amount and the reason for redraw.

*Ans:*

*Please refer to Exhibit H-3-2 List of Loans with all the detail required. In the domestic market, there is no loan redrawn anyway. On the other hand, all offshore loans are put into "Roll-over" mode for regular financial operation purposes, but not be redrawn anyway.*

*The short-term loans under Syndicated Loan Tranche B source are repaid on due date, and they were not redrawn. The long-term loan under Syndicated Loan Tranche A is partially repaid based on the repayment schedule set by Syndicated Loan Banks.*

4. Indicate whether each bank is Vietnamese or foreign-owned and give the percentage of government ownership of each bank (including ownership by entities owned or controlled by a government).

*Ans:*

*Among all banks listed in Exhibit H-3-2 List of Loans, only INDOVINA BANK LTD. (DONG NAI BRANCH) is partially owned (32.23%) by the Vietnamese Government indirectly via Vietinbank (Vietnam Joint Stock Commercial Bank for Industry and Trade) (which owns 50% of INDOVINA BANK, and the remaining 50% owned by the Taiwanese Cathay United Bank. The former Vietinbank is 64.46% owned by the State Bank of Vietnam). Please refer to Exhibit H-3-2 List of Loans for the requested information.*

5. In the case of each loan from government-owned or controlled, please explain the reason for borrowing from such a bank rather than a commercial bank. What are the differences in the terms and conditions of loans between the government and commercial banks?

*Ans:*

*In the period of investigation, there were [REDACTED] made with INDOVINA Bank, which were [REDACTED]. However,*

*Comparatively, the borrowing cost of [REDACTED]*

*Therefore, the INDOVINA commercial bank [REDACTED]*

*[Confidential information relating to borrowings]*

6. Explain how the decisions to grant the loan or its conditions are dependent on the purpose of the loan and give details on the process your company went through to apply for the loan. Please provide detail on what conditions or criteria your company needed to fulfil to be granted the loan.

*Ans:*

*CSVN applies for the loan of INDOVINA BANK [REDACTED]*

*According to the Vietnamese law, the USD loans from Banks within Vietnam is only used for financing the payments to foreign suppliers for imported goods.*

*[Confidential information relating to borrowings]*



7. For each of the loans listed, provide copies of signed loan agreements between the bank which provided the loan and company which was the addressee of the loan specifying the conditions of the loan such as amount, term of repayment, interest rate etc. Also provide a copy of your application for the loan.

*Ans:*

*We hereby provide sample loan agreement and application with Indovina Bank in Exhibit H-3-7(a)~(c) Credit Loan Agreements and Disbursement Requests.*

*Note: If your company has more than one loan from same bank/financial Institution which were not repaid by the end of the investigation period and the loan agreements for these loans are standardised, it is sufficient **at this stage** to provide an English translation for one of them only (e.g. If your company has multiple loans from one particular bank which only differ in amounts you only need to translate one of them into English for your questionnaire response. However it is necessary to translate all credit line agreements from which loans not repaid by the end of the investigation period were drawn.*

8. Please explain whether the granting of the specific loan depended on the link between the purpose of the loan and the goals specified in any government plan or development program. Provide a copy of the laws, regulations, administrative guidelines and any other acts relevant for the operation of this lending with any subsequent amendments. Also include a copy of any governmental or development plan of which the scheme represents a direct implementation.

*Ans:*

*Not applicable. All of our outstanding loans in POI are commercial loans.*

9. For each loan application, please explain the involvement of third parties such as government departments, local councils, party committees in the whole process since the application for the loan up to the decision whether the loan is granted or not.

*Ans:*

*Not applicable. All of our outstanding loans in POI are commercial loans.*

10. In the "H-3 Preferential Loans" spreadsheet, provide the information requested on guarantees for the loans provided to your company.

*Ans:*

*There was [REDACTED]*

*There are only the [REDACTED]*

Besides, all other loans are drawn under

*[Confidential information relating to borrowings]*

11. Please give details of all loan applications during the investigation period which were refused; give the name of the bank, the amount of the loan requested and the reasons for refusal.

*Ans:*

*There has been no loan application of CSVC rejected.*

12. Provide any other information you may deem necessary for the commission to make an assessment on the subsidisation of producers/exporters of the product under investigation. You may adjust the table in the "Loans" tab as necessary to include this additional information.

*Ans:*

*No further information*

## CATEGORY H-4 ANY OTHER PROGRAMS

Provide answers to the following questions in the "H-4 Any Other programs" tab.

1. Provide a list of all the economic zones in which you have business operations (including locations of factories, sales offices, or other places of business).

*Ans:*

State in which the operation is located	Type of operations
<i>My Xuan A2 Industrial Zone, My Xuan Commune, Tan Thanh Dist., Ba Ria-Vung Tau Province</i>	<i>Factory of manufacturing</i>
<i>9 F of Petroland Tower -Số 12 Đường Tân Trào, P. Tân Phú, Q7, Tp. HCM</i>	<i>Representative office</i>

2. Are you aware of any programs of the Government of Vietnam, any of its agencies or any other authorised body, that benefits<sup>[1]</sup> manufacturers of galvanised steel that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program.)

*Ans:*

*No, we are not aware of any programs of Government of Vietnam, any of its agencies or any other authorised body, that benefits manufacturers of galvanised steel.*

3. Indicate the location of the program by state, region, province or municipal level.

*Ans:*

*Not applicable; see our answer to Q.2 above.*

<sup>[1]</sup> Refer to the Glossary of Terms for a definition of benefit in this context.

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

*Ans:*

*Not applicable; see our answer to Q.2 above.*

For **each program** that you have identified, answer the following.

5. Indicate whether your company benefited from any of the listed programs.

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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).

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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 Vietnam in relation to the program.

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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 state in which your business is located.

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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.

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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.

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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

*Ans:*

*Not applicable; see our answer to Q.2 above.*

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

*Ans:*

*Not applicable; see our answer to Q.2 above.*

16. If the program has been terminated, please provide details (including when and 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?

*Ans:*

*Not applicable; see our answer to Q.2 above.*

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Category H-5 in relation to this programme.

*Ans:*

*Not applicable; see our answer to Q.2 above.*

## SECTION I

### PARTICULAR MARKET SITUATION

The applicant claims that a ‘particular market situation’ exists in respect of galvanised steel (the goods) in Vietnam due to government influence on both the prices of the goods and the major raw material inputs including hot rolled coil (HRC), iron ore, coal, and cold-rolled steel used in the manufacture of the goods. The existence of a ‘particular market situation’ could affect the Commission’s approach to calculating the 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 is 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).

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

Through this section of the questionnaire, the Commission is seeking information from your business, supported by evidence, in assessing the market situation claims made by the applicant. All document provided must be accompanied with a translated English version as well as the original version.

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

#### PART I-1 GENERAL INFORMATION

##### 1. Ownership and management

- a) Has the Government of Vietnam (GOV)<sup>5</sup> anytime in the previous 5 years been a shareholder (or invested either directly or indirectly) in your business? If so, provide details of shareholding and/or investments.

*No. GOV has never been a shareholder (or invested either directly or indirectly) in our business.*

- b) List all the directors and major shareholders of your business and identify any common directors and executive officers between your business and related businesses.

*The List of all directors is as follows:*

<i>No.</i>	<i>Full name</i>	<i>Division</i>	<i>Job Title</i>
<i>X</i>			

<sup>5</sup> References to the GOV include any government authorities at any level (e.g. National, Provincial, Regional, Local), agency, party, or otherwise associated entity.

[illegible]

No.	Shareholder name	Percentage of shares in CSVC
1		%
2		%
3		%
4		%
5		%
6		%

- No. They are not affiliated with the GOV.*

- No. They are not appointed, managed or recommended by the GOV.*

- The original ownership structure of CSVC as of 2014 is as follows:*

[illegible]

\_\_\_\_\_



- f) Identify all positions within your business that are appointed or designated to act on behalf of GOV authorities.

*No, there is no position within our business that is appointed or designated to act on behalf of GOV authorities.*

- g) Explain whether there are any GOV requirements by law and/or any internal business policy to have GOV representation in your business. If so explain their role.

*No, there is no such GOV requirements.*

- h) Does the GOV representative(s) or the person(s) appointed by the GOV have any VETO rights for any decisions made by the Board and/or the senior executives of your business? If so explain how and when such powers are exercised.

*Not applicable. There is no GOV representative(s) in our business.*

- i) Who has the ability to reward, hire, fire or discipline your business' senior managers and executives?

*The Board of Management of CSVC has the ability to reward, hire, fire or discipline out senior managers and executives.*

- j) Do any of your business' senior managers hold positions in any GOV departments or organisations, associations or Chambers of Commerce? If so describe the nature of their positions.

*No. Our senior managers do not hold positions in any GOV departments or organisations, associations or Chambers of Commerce.*

- k) Is your business publicly listed and traded on a securities exchange?

*No. Our business is not publicly listed and traded on a securities exchange.*

- l) If so, identify all types of securities listed and name all securities exchange's on which they are traded.

*Not applicable. Our business is not publicly listed and traded on a securities exchange.*

- m) Are there any restrictions to trade these securities (e.g. restricted only to Chinese nationals etc.)?

*Not applicable. Our business is not publicly listed and traded on a securities exchange.*

## 2. Business planning

- a) Explain your business' decision-making process in general and in respect of steel products in relation to:

i. what goods are produced;

*Pickled & Oiled Hot-rolled Steel Coil  
Cold-rolled Steel Coil  
Galvanized/ Galvannealed Coil  
Electrical Steel Coil*

ii. how the goods are produced;

*Please refer to page 8 of CSVC-Exhibit A-3.10(b) CSVC Company Brochure for the production process.*

iii. how much is produced;

*Please refer to Exhibit I-1.2(a) for production volume in POI.*

iv. the quantity of inputs (such as raw materials and energy) purchased and how it is allocated to the manufacture of different products;

*Please refer to Exhibit I-2.3 for purchase of hot-rolled steels in POI.*

*The quantity of inputs purchased and the volume of different products produced are based on sales and production forecast, as well as the existing stock level, delivery lead-time, etc.*

v. how price of the goods is determine in the domestic market;

*CSVC sales department will collect market information and price information for monthly pricing meetings. The monthly pricing meetings will decide the price ranges for each product category and grades of the coming month or months.*

vi. the location of your production facility;

*My Xuan A2 Industrial Zone, My Xuan Commune, Tan Thanh District, Ba Ria – Vung Tau Province, Vietnam.*

vii. does your company supply the goods certain regions only

*No. CSVC supplied the goods to Vietnam domestic market and other countries.*

viii. how your business' profit is distributed (e.g. dividends, share buyback etc.); and

*CSVC started its commercial operation in November, 2013, and has realized accumulated losses till now, so the company has not proposed the plan for profit distribution in the near future.*

ix. how you make decisions regarding your companies' growth target and other strategic decisions (e.g. expansions, mergers,



acquisitions, restructures).

*CSVC, and its two main shareholders (CSC and NSSMC) periodically hold tri-party meetings discussing and deciding the future and recent operation of CSVC.*

x. Has there any changes to your business model since 2010.

*There is no material change to CSVC's business model since its official launch of production in November 2013.*

- b) Provide a description of any GOV input/guidance into the decision-making process regarding your manufacturing, marketing and sale of steel products.

*GOV is not involved in any way in CSVC's decision-making.*

- 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.

*There is no involvement by the GOV in CSVC's production, sale or purchase of our products.*

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

*Please see **Exhibit I-1.2(b)** for meeting minutes of Board of Management and **Exhibit I-1.2(c)** for meeting minutes of General Shareholders.*

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

*Please see a sample price meeting minutes provided in **Exhibit I-1.2(d)**.*

- f) Provide the copies of your Business and/or Corporate Plan that were effective during the Investigation period.

*Please see **Exhibit I-1.2(b)** for meeting minutes of Board of Management and **Exhibit I-1.2(c)** for meeting minutes of General Shareholders for our business plan.*

- g) Has your business been involved in any mergers and/or acquisitions in the last 5 years? Is so, provide details.

*No.*

- h) Has your business undergone any major restructuring in the last 5 years? Is so, provide details.

*No.*

- i) Is your business currently, or in the last 5 years, been involved in a joint venture? If so, provide details.

*CSVC has not been involved in any joint venture.*

### **3. Licensing**

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

*Please refer to **Exhibit I-1.3(a)** for CSVC's current Business Registration Certificate and **Exhibit I-1.3(b)** for the current CSVC Investment Certificate amendment.*

- b) Identify the GOV departments or offices responsible for issuing the license(s).

*According to Article 13, Decree No. 78/2015/ND-CP on Enterprise Registration dated 14/09/2015 of Government, the business registration authority of each province is the Business Registration Office, which is subordinate to the Department of Planning and Investment of the province.*

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

#### **For the Business Registration Certificate:**

*According to Article 27 of the Law on Enterprise 2014, the founder of the enterprise or an authorized person shall submit the application for enterprise registration prescribed in this Law to the business registration authority. The business registration authority shall consider the legitimacy of the application for enterprise registration and issue the Certificate of Business registration within 03 working days from the day on which the application is received. If the application is rejected, a written notification must be sent to the applicant. The notification must provide explanation and necessary adjustments or additions.*

#### **For the Investment Certificate:**

*According to Article 34 of the Law on Investment 2014:*

*"1. The investor shall submit the project dossier to the local registry office. The dossier consists of:*

- a) The documents mentioned in Clause 1 Article 33 of this Law;*
- b) Land clearance and relocation plan (if any);*
- c) Preliminary assessment of environmental impacts and environmental protection measures;*
- d) Assessment of socio-economic effects of the project.*

2. *Within 03 working days from the day on which the satisfactory dossier is received, the registry office shall send it to the Ministry of Planning and Investment and send written requests for opinions from the regulatory agencies as prescribed in Clause 6 of this Article.*
  3. *Within 15 days from the receipt of the request, the inquired agencies shall send written responses to the registry office and the Ministry of Planning and Investment.*
  4. *Within 25 days from the day on which the project dossier is received, the registry office request the People's Committee of the province to appraise the project dossier and send it to the Ministry of Planning and Investment.*
  5. *Within 15 days from the receipt of the documents mentioned in Clause 4 of this Article, the Ministry of Planning and Investment shall appraise the project dossier and make an appraisal reports as prescribed in Clause 5 Article 33 of this Article, the request the Prime Minister to issue decisions on investment policies.*
  6. *The Prime Minister shall consider deciding investment policies as prescribed in Clause 8 Article 33 of this Law."*
- d) Describe all requirements and/or conditions that must be met in order to obtain the license(s).

*According to Article 23 of the Law on Enterprise and Article 22 of Decree 78/2015/ND-CP, the enterprise has to submit dossier as below:*

1. *An application form for business registration.*
  2. *The company's charter.*
  3. *A list of founding shareholders and shareholders being foreign investors.*
  4. *Copies of:*
    - a) *Copies of the ID card or other ID papers of founding shareholders and foreign investors being individuals;*
    - b) *Decision on Establishment, Certificate of Business registration, or an equivalent document of the organization and the letter of authorization; the ID card or other ID papers of the authorized representatives of founding shareholders and foreign investors being organizations.*

*If shareholders are foreign organizations, the copy of the Certificate of Business registration or an equivalent document must be consularly legalized.*
    - c) *The Certificate of Investment registration of the foreign investors as prescribed by the Law on Investment.*
- e) Describe any sanctions and/or restrictions imposed on your business if you act outside the scope of your business license(s).

*According to Article 49 of Decree 78/2015/ND-CP:*

*“1. In case of addition/change of business lines, the enterprise shall send a notification to Business Registration Office where it was registered. The notification shall contain:*

- a) Name, enterprise ID number, TIN, or number of certificate of business registration (in case the enterprise has not had a enterprise ID number or TIN);*
- b) The new or changed business lines;*
- c) Full name and signature of the legal representative of the enterprise.*

*The notification must be enclosed with the decision and legitimate copy of the minutes of meeting of the Board of members (if the enterprise is a multi-member limited liability company), the General Meeting of Shareholders (if the enterprise is a joint-stock company), general partners (if the enterprise is a partnership), or decision of the company's owner (if the enterprise is a single-member limited liability company) on addition/change of business lines. The decision and minutes of meeting must specify the changes in the company's charter.*

- 2. When receiving the notification, Business Registration Office shall give a confirmation slip, examine the validity of documents, change information about the enterprise's business lines on National Enterprise Registration Database. Business Registration Office shall issue a certification of change of registered information about the enterprise at the request of the enterprise.*
- 3. If documents about addition/change of business lines are not satisfactory, Business Registration Office shall request the enterprise to complete the documents within 03 working days.*
- 4. The enterprise has the responsibility to notify addition/change of its business lines to Business Registration Office within 10 working days from the occurrence of such change. Otherwise, the enterprise will incur penalties in accordance with penalties for administrative violations against regulations on planning and investment.”*

*- According to Article 31 of Decree No. 50/2016/ND-CP on Penalties for Administrative Violations against Regulations On Planning And Investment:*

- “1. A warning or A fine of VND 500,000 - VND 1,000,000 shall be imposed for notifying changes to the enterprise registration content 1 – 30 days behind schedule.*
- 2. A warning or A fine of VND 1,000,000 - VND 2,000,000 shall be imposed for notifying changes to the enterprise registration content 31 – 90 days behind schedule.*

3. *A warning or A fine of VND 2,000,000 - VND 5,000,000 shall be imposed for notifying changes to the enterprise registration content 91 days or longer behind schedule.*
  4. *Remedial measure: Notify the changes to the Provincial Business Registration Office.”*
- f) Describe and explain any rights or benefits conferred to your business under the license(s).

*According to Article 7 of Investment Certificate No. 3266151700, the ninth amendment on 08/08/2016 issued by Ba Ria – Vung Tau Industrial Zones Authority, CSVN enjoyed benefits as below:*

- a) *Corporate Income Tax (CIT):*
- *enjoy the tax rate of 20% (twenty percent) of taxable income for 10 (ten) years starting from the first year that the Enterprise has taxable income from the investment project and the rate of 25% (twenty five percent) for the years later.*
  - *exempted from CIT for 02 (two) years and enjoy reduction of 50% (fifty percent) of the tax payables for 04 (four) year thereafter.*
- b) *The enterprise is exempted from import tariff for imported goods in accordance with provisions of Article 16, Law on Export Tax, Import Tax No. 45/2005/QH11 dated 14 June 2005 and Article 16, Decree No. 149/2005/ND-CP dated 8th December 2005 of the Government providing detailed implementation of Law on Export Tax, Import Tax.*
- g) Describe the circumstances under which your business license(s) can be revoked, and who has the authority to revoke the license(s).

**For the Business Registration Certificate:**

*According to Article 211. Revocation of Certificate of Business registration of Law on Enterprise 2014:*

1. *A enterprise shall have its Certificate of Business registration revoked in the following cases:*
  - a) *The information provided in the application for enterprise registration is false;*
  - b) *The enterprise is established by persons banned from enterprise establishment as prescribed in Clause 2 Article 18 of this Law;*
  - c) *The enterprise’s business operation is suspended for 01 year without notifying the business registration authority and tax authority;*
  - d) *The enterprise fails to submit reports as prescribed in Point c Clause 1 Article 209 of this Law to the business registration authority within 06 months from the deadline or from the receipt of a written request;*

*e) there cases decided by the Court.*

*The Business Registration Office where enterprise registered the license has the authority to revoke this license.*

**For Investment Certificate:**

- “a) The investor decides to terminate the project;*
- b) The project has to be terminated according to the regulations of the contract or company’s charter;*
- c) The project duration is over;*
- d) The investor fails to overcome the difficulties that lead to project suspension in the cases mentioned in Clause 2 and Clause 3 Article 47 of this Law;*
- e) The land of the project is withdrawn by the State, or the investor is not permitted to keep using the premises and fails to complete procedures for change of project location within 06 months from the day on which the decision on land/premises withdrawal is issued;*
- e) The registry office cannot contact the investor or the investor’s legal representative after 12 months from the date of suspension of the project;*
- g) The investor fails to execute or is not able to execute the project after 12 months according to the schedule registered with the registry office and is not permitted to extend the project execution schedule as prescribed in Article 46 of this Law;*
- h) The project is terminated under a decision of the Court or arbitral tribunal.”*

*Provincial Industrial Zones Authority where enterprise registered the license has the right to revoke the license.*

- h) What are the on-going conditions and/or requirements of your business license? Name the authority that manages the compliance of these conditions and/or requirements?**

*The Investment certificate is governed by the Law on Investment 2014 and other related Decrees. The authority that manages the compliance of IC is BA Ria – Vung Tau Industrial Zones Authority (BIZA).*

*The Business Registration Certificate is governed by the Law on Enterprise 2014 and other related Decrees. The authority that manages the compliance of Business Registration Certificate is Business Registration office under the Department of Planning and Investment.*

- i) What licensing arrangement / regulations exist for accessing major raw materials used in the production of steel?**

*No. CSVC's key inputs for the subject goods are HRC and zinc ingot, and CSVC can freely import these two inputs.*

#### 4. Capital investment activities

- a) List all capital investment activities (e.g. new production line, upgrades) your business has undertaken in the last 5 years and provide details of the approval process and any conditions placed upon the approval. Provide all relevant documentation, including copies of application forms and approval letters.

*CSVC started its commercial operation in November, 2013.*

*Objective and scale of the project: Manufacture of high quality steel flat products used in industries.*

*Capacity:* [REDACTED] *included:*

+	[REDACTED]	:	[REDACTED] Tons/year
+	[REDACTED]	:	[REDACTED] Tons/year
+	[REDACTED]	:	[REDACTED] Tons/year
+	[REDACTED]	:	[REDACTED] Tons/year
+	[REDACTED]	:	[REDACTED] Tons/year

- b) If an application for your capital investment activity was not approved, provide details and documentation for the refusal.

*Not applicable.*

- c) Identify all relevant authorities responsible for approving capital investments including the office address, phone and fax numbers. Also provide a brief description of the role of the authority in the approval process.

*1. BA Ria – Vung Tau Industrial Zones Authority (BIZA).*

*Office address: 198 Bach Dang Street, Phuoc Trung District, Ba Ria City.*

*Tel: (064)3 816 640*

*Fax: (064)3 858 531*

*Because CSVC conducts business in an industrial zone, therefore, CSVC is an enterprise under managing of BIZA. Whenever having any change in capital investment, CSVC have to register to adjust information related to capital investment in Investment Certificate for their acceptance.*

*2. Ba Ria – Vung Tau Department of Planning and Investment*

*Office address: 198 Bach Dang Street, Phuoc Trung District, Ba Ria City.*

*Tel: 064.3852.401*

*Fax: 064.3859.080*

*According to Article 29 of the Law on Enterprise 2014, capital investment is the information stated detail in Business Registration Certificate, which means it is also an issue under managing of Department of Planning and Investment. Therefore, whenever having any change in capital investment, besides registering to change IC at BIZA, CSVC also has to register the changes related to capital investment in Business Registration Certificate for their acceptance.*

- d) Provide details of approval process from state, regional, provincial, local government etc. indication including how the bodies at different levels interact.

**Ba Ria – Vung Tau Industrial Zones Authority (BIZA)**

*According to Article 40. Adjusting the Certificate of investment registration*

*1. When the Certificate of investment registration has to be adjusted, the investor shall follow the procedures for adjusting the Certificate of investment registration.*

*2. An application for adjustment to the Certificate of investment registration consists of:*

*a) A written request for adjustment to the Certificate of investment registration;*

*b) A report on project execution up to the date of project adjustment;*

*c) A decision on adjustments to the investment project;*

*d) Documents mentioned in Points b, c, d, đ and e Clause 1 Article 33 of this Article relevant to the adjustments.*

*3. Within 10 working days from the day on which the satisfactory application is received as prescribed in Clause 1 of this Article, the registry office shall adjust the Certificate of investment registration. In case of rejection, the investor must be notified in writing and provided with explanation.*

*4. If the project is subject to issuance of a decision on investment policies, the registry office shall follow the procedures for issuance of a decision on investment policies before adjusting the Certificate of investment registration if the adjustments are pertaining to the objectives, targets, primary technologies of the project, increase or decrease of capital investment by more than 10%, project duration, changes of investors or conditions applied to investors (if any).*

**Ba Ria – Vung Tau Department of Planning and Investment**

*According to Article 31. To register changes to the Certificate of Business registration*

*1. The enterprise must register with the business registration authority when contents of its Certificate of Business registration are changed.*

*2. The legal representative of the enterprise must register the changes to the Certificate of Business registration within 10 days from the day on which such*



*changes are made.*

*3. The business registration authority shall consider the legitimacy of the documents and issue a new Certificate of Business registration within 03 working days from the day on which the application is received. If the application is rejected, a written notification must be sent to the applicant. The notification must provide explanation and necessary adjustments or additions.*

- e) For capital investments undertaken since 2010, what were key factors driving each investment and how the investment was undertaken i.e. internal or externally funded, undertaken through joint venture of as separate company or subsidiary. Please provide details.

*The key factor driving CSVC's establishment is to start the business in steel industry for meeting the growing demands of the Vietnamese Market, ASEAN Market, and other International Markets in a wide range of manufacturing industries in need for high quality steel products.*

*The investment ( [REDACTED] ) was undertaken since 2010 by investors with different proportions as per below. (It was undertaken through joint venture of the investors indicated below.)*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**5. Financing and investment activities**

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

*Business debt is funded only by borrowing from banks.*

*List of all major lenders is provided in **Exhibit I.1-5(a)**.*

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

[REDACTED]

[REDACTED] The long-term loan is the most lasting loan over the last 5 years.

Please see *Exhibit I.1-5(b)* for the list of interest rate for [REDACTED]

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

*No. CSVC has not benefitted from any concessional interest rates.*

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

*No.*

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

[REDACTED]

*[Confidential investment information]*

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

*No.*

- g) Was there any restriction placed of capital provided by particular institution(s)? if so provide details explaining the type of restriction, who placed the restriction and reasons for the restriction.

*No.*

## **6. Industry associations**

- a) Are you a member of any industry association (either governmental or non-governmental)? If so, for each association provide details including:

- i. The name of the association.  
*Vietnam Steel Association (VSA)*
- ii. When your business joined the association.  
[REDACTED]
- iii. Whether there are any membership fees.  
*Yes. The annual fee is [REDACTED]*
- iv. The purpose of the association.  
*VSA was established for the aim of promoting cooperation among the members in speeding up the steel industry with stronger and sustainable development, achieving industrialization and modernization.*
- v. The benefits of the association.  
*- Updating steel information through monthly report including: domestic shipments & production, government's legal regulations and requirements, interests and concerns of steel sector & enterprises, world steel news, etc. ;*  
*- Meeting with other steel enterprises;*  
*- Attending technical seminar held by VSA or SEAISI; and*  
*- Attending trade promotional programs.*
- vi. Any restrictions or conditions placed on your business by being a member of the association.  
*No.*
- vii. Any other on-going requirements for the association.  
*No.*

## 7. Interaction with the GOV

- a) Provide details of all interactions that your business has with the GOV including reporting requirements to the GOV.

- [illegible]

- [REDACTED]  
- [REDACTED]  
- [REDACTED]  
- [REDACTED]  
- [REDACTED]  
- [REDACTED]

- b) Provide contact details of any GOV departments, bureaus or agencies that your business has had any dealings with that are responsible for the administration of measures in the steel industry.

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

- i. industrial policy and guidance on the steel industry sector;
- ii. market entry criteria for the steel industry sector;
- iii. environmental enforcement for the steel industry sector;
- iv. management of land utilization;
- v. investigation and inspection of new steel expansion facilities;; and
- vi. import licensing for HRC, iron ore, steel and other steel raw materials.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*[Confidential contact details]*

- c) How has the GOV's National Steel Policy<sup>6</sup> impacted on your business and how do you ensure compliance with this policy?

*The related laws to the steel industry are as below*

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<sup>6</sup> also referred to as the Steel and Iron Industry Development Policy, as well as by several other titles

<i>Document Code</i>	<i>Title</i>	<i>Issued Date</i>
<i>58/2015/TTLT-BCT-BKHCN</i>	<i>PROVIDING FOR MANAGEMENT OF DOMESTICALLY-PRODUCED AND IMPORTED STEEL QUALITY</i>	<i>31/12/2015</i>
<i>32/2013/TT-BTNMT</i>	<i>PROMULGATION OF NATIONAL TECHNICAL REGULATIONS ON ENVIRONMENT</i>	<i>25/10/2013</i>
<i>25_2009_TT-BTNMT</i>	<i>ON PROMULGATION OF THE NATIONAL REGULATION ON ENVIRONMENT MINISTER OF NATURAL RESOURCES AND ENVIRONMENT</i>	<i>1/1/2009</i>
<i>59/2007/NĐ-CP</i>	<i>ON SOLID WASTE MANAGEMENT</i>	<i>9/4/2007</i>

*CSVC consults the relevant government agencies from time to time to ensure a full and accurate understanding of the policy requirements in order to ensure full compliance with such policies.*

- d) Have you had dealings or communications with the government department and/or relevant ministry in the last 5 years? If so, provide details.

*Please refer to the answer to (a) above.*

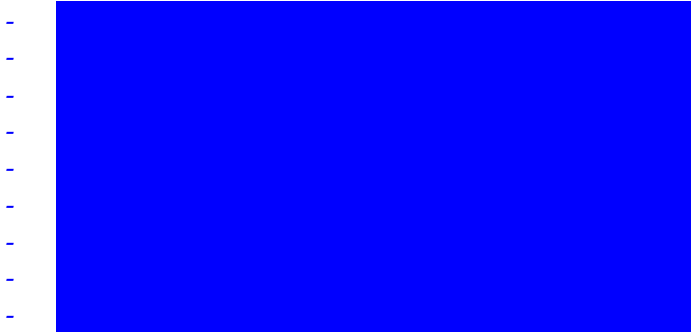
- e) Provide details of all the taxes paid by your business in the last 5 years (e.g. company tax, sales tax, levies, royalties). Ensure that you include the tax rate, whether it is a reduced rate and the name of the authority that it is paid to.

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]

*[Confidential tax related information]*

- f) List and describe all reports that are required to be submitted to the GOV? How often such reports are required? Identify the government department/office where each report is filed.

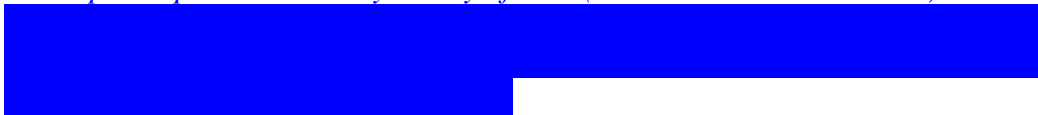
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]



- g) Does your business provide selling price information or participate in surveys to an external agency? If so, provide details.

*CSV C does not provide selling price information since it is confidential.*

*CSV C participates in monthly survey of VSA (Vietnam Steel Association).*



- h) Are there any licensing requirements to access key inputs or capital? If so provide details.

*No.*

## **PART I-2 THE GALVANISED STEEL**

### **1. Sales and production**

- a) Provide a list of all your domestic customers of the goods, include the location (city, state or province) of the customer and indicate whether each customer is a State Invested Entity (SIE) and/or State Owned Entity (SOE).

*Please refer to **Exhibit I-2.1** for the list of domestic customers of the goods during the POI.*

- b) Does your business need to obtain approval or a licence to manufacture and sell the goods? If so, provide details.

*No.*

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

*No.*

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

*No.*

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

*No.*

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

*Not applicable.*

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

*No.*

## **2. Selling price**

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

*The selling price is determined in the monthly price meeting of CSVC. Please see a sample price meeting minutes provided in **Exhibit I-1.2(d)**.*

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

*Price is determined by individual business entity considering the market competition.*

[Redacted]

[Redacted]

*[Confidential information of market terms and pricing]*

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

*The attendees list of the price meeting will be included in the meeting minutes.*

[Redacted] *in **Exhibit I-1.2(d)**.*

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

*The price meeting is held monthly. Please see a sample price meeting minutes provided in **Exhibit I-1.2(d)**.*

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

*The prices of the sales are in accordance with the price determined in monthly price meetings.*

*The sales term and other contract provisions will be approved by Commercial Vice President of CSVC.*

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

*Not applicable. CSVC only have production facilities in My Xuan A2 Industrial Zone, My Xuan Commune, Tan Thanh Dist., Ba Ria-Vung Tau Province.*

### 3. HRC purchases

**Only answer the following questions if your business, or related businesses, purchase HRC**

- a) Provide a detailed listing of your HRC purchases by completing the **I-2.3 HRC Purchases** tab of the attached spreadsheet.

*Please refer to **Exhibit I-2.3 HRC Purchases**. None of CSVC HRC purchases was from China.*

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

*As shown in CSVC **Exhibit I-2.3 HRC Purchases**, CSC purchased HRC from [REDACTED].*

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

[REDACTED]

*[Confidential purchasing information]*

- d) If HRC is imported by your business, or related businesses:

- i. Provide details including a description of the HRC imported, the supplier and country of origin.

<i>No.</i>	<i>HRC Suppliers</i>	<i>Country of Origin</i>
<i>1</i>	[REDACTED]	[REDACTED]
<i>2</i>	[REDACTED]	[REDACTED]

- ii. Explain the process required to import HRC (e.g. obtaining an



import licence, import declarations).

[REDACTED]

*[Confidential purchasing information]*

- iii. Provide details of any conditions to importing the HRC (e.g. customs and/or quarantine).

[REDACTED]

<i>Document Code</i>	<i>Title</i>	<i>Issued Date</i>
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

- iv. Is your business eligible for a duty drawback? If so, provide details.

[REDACTED]

### **PART I-3 HOT ROLLED COIL STEEL**

*The following questions are not applicable to CSVC, as CSVC's business does not include selling HRC.*

#### **1. Sales and production**

***Only answer the following questions if your business, or related businesses, sell HRC***

- Provide a list of all your domestic customers of HRC and indicate whether each customer is an SIE/SOE.
- Are you required to obtain approval or a licence to sell HRC? If so, provide details.
- Are there any restrictions and/or conditions in relation to the quality or quantity of the production of HRC placed upon your business? If so, provide details.
- Do you have an export licence for exports of HRC? If so, provide details.
- Is HRC sold by your business subject to any export restrictions and/or limits during the previous 5 year? If so, provide details.

- f) Provide details regarding any other restrictions (e.g., geographic/regional, downstream, end use) placed upon your business on the sale of HRC.
- g) Have there been any changes to your production capacity of HRC over the last 5 years? If so, provide details.

## 2. Selling price

***Only answer the following questions if your business, or related businesses, sell HRC***

- a) Describe in detail how the selling price of HRC is determined. In particular, provide details of any restrictions, limitations, or other considerations faced by your business.
- b) Which organisation/business entity do you consider as the price leader of HRC?
- c) Does your business have a pricing committee in respect of HRC? If so provide the names and positions of all members of the Committee.
- d) How often does the pricing committee meet to discuss selling prices of HRC? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the investigation period.
- e) Identify the person who authorises the sales terms, prices and other contract provisions for the sale of HRC by your business.
- f) If you have production facilities of HRC in more than one state, region and/or province, are the laws and regulations in each region the same with respect to pricing of HRC? If not, provide details on the differences.
- g) If you have customers of HRC located in more than one state, region and/or province, are the selling prices of HRC different? If so, explain the reasons on the differences.

## PART I-4 RAW MATERIAL PURCHASES

***Only answer the following questions if your business, or related businesses, manufacture HRC***

*The following questions are not applicable to CSVC, as CSVC's business does not include manufacturing HRC.*

- a) Provide a detailed listing of you raw material purchases (e.g. iron ore, coking coal) by completing the **H-4 Raw Material Purchases** tab of the attached spreadsheet).
- b) Do you have more than one supplier of the raw materials? If so, provide an explanation of the reasons of price differences between these suppliers?
- c) Describe in detail your business' purchase procedures of the raw materials and the considerations in selecting a supplier. If it is by

tenders, provide details of the criterions/conditions.

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

**SECTION J**  
**EXPORTER'S DECLARATION**



I hereby declare that.... CHINA STEEL SUMIKIN VIETNAM JOINT

STOCK COMPANY did, during the period of review, export the goods under consideration and have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.



I hereby declare that.....(company)

did not, during the period of review, export the goods under consideration and therefore have not completed the attached questionnaire.

Name : **Chen Min-Hun**

Signature : 

Position  
in Company : **Chairman & General Director**

Date : **2016.11.15**



## 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	<input checked="" type="checkbox"/>
Section B – export price	<input checked="" type="checkbox"/>
Section C – like goods	<input checked="" type="checkbox"/>
Section D – domestic price	<input checked="" type="checkbox"/>
Section E – fair comparison	<input checked="" type="checkbox"/>
Section F – exports to third countries	<input checked="" type="checkbox"/>
Section G – costing information	<input checked="" type="checkbox"/>
Section H – Subsidy Programs	<input checked="" type="checkbox"/>
Section I – Particular Market Situation	<input checked="" type="checkbox"/>
Section J – Declaration	

Electronic Data	Please tick if you have provided spreadsheet
<b>INCOME STATEMENT</b>	<input checked="" type="checkbox"/>
<b>TURNOVER</b> – sales summary	<input checked="" type="checkbox"/>
<b>AUSTRALIAN SALES</b> – list of sales to Australia	<input checked="" type="checkbox"/>
<b>DOMESTIC SALES</b> – list of all domestic sales of like goods	<input checked="" type="checkbox"/>
<b>THIRD COUNTRY</b> – third country sales	<input checked="" type="checkbox"/>
<b>PRODUCTION</b> – production figures	<input checked="" type="checkbox"/>
<b>DOMESTIC COSTS</b> – costs of goods sold domestically	<input checked="" type="checkbox"/>
<b>AUSTRALIAN COSTS</b> – costs of goods sold to Australia	<input checked="" type="checkbox"/>
<b>INCOME TAX PROGRAMS</b>	<input checked="" type="checkbox"/>
<b>PREFERENTIAL TAX PROGRAMS</b>	<input checked="" type="checkbox"/>
<b>TARIFF PRGRAMS</b>	<input checked="" type="checkbox"/>
<b>GRANTS</b>	<input checked="" type="checkbox"/>
<b>RAW MATERIAL PURCHASES</b>	<input checked="" type="checkbox"/>
<b>OTHER PROGARM</b>	<input checked="" type="checkbox"/>
<b>ALL OTHER PROGRAMS</b>	<input type="checkbox"/>