



**FOCUS MERCHANT MANAGEMENT SDN BHD** (1122991-U)

No. 2A-A, Jalan Teknologi 3/5,  
Pusat Teknologi Sunsuria,  
Kota Damansara, 47810 Petaling Jaya,  
Selangor Darul Ehsan, Malaysia.

Tel +603 6143 6888  
Fax +603 6150 6806

GST REG NO  
001005080576

28 September 2016

Mr Matthew Williams  
Director Investigations – Operations 3  
Anti-Dumping Commission  
Level 35, 55 Collins Street  
GPO Box 1632  
Melbourne VIC 3000

By email: [operations3@adcommission.gov.au](mailto:operations3@adcommission.gov.au); [matthew.williams@adcommission.gov.au](mailto:matthew.williams@adcommission.gov.au);

Dear Matthew,

**Submission by FOCUS MERCHANT MANAGEMENT SDN BHD (FMM) regarding ADC Case No 362  
Investigation into the alleged dumping and subsidisation of certain aluminium extrusions exported  
from Malaysia and the Socialist Republic of Vietnam**

Sean Chong, the Managing Director of FMM is willing to cooperate with the Anti-Dumping Commissioner (ADC) throughout the course of the Investigation and is able to provide any further information or assistance which the ADC may require, but the fact that the first questionnaire was sent to the old FMM address didn't allow FMM to be able to reply within the due date. We would like to apologise for not taking any action before today. Now, we would like to make submission to explain the business deal with an Australian importer, [REDACTED] *[Name of the Australian Importer]*. The explanation will come in 2 letters, one by FMM, who's the trading company and the exporter, and another letter by P.A. EXTRUSION (M) SDN BHD (PAE), who's the Malaysian manufacturer, and [REDACTED] *[Description of business nature]*.

**Introduction to FMM**

FOCUS MERCHANT MANAGEMENT SDN BHD (1122991-U) is a company incorporated in December 2014 under the laws of Malaysia, with core business of exporting Aluminium Extruded Material in form of Mill Finish, Powder-Coated, Anodized and Fabricated, to Australia, [REDACTED] *[Description of other business nature for FMM]*.

**Business Deal**

The business deal between 3 parties can be summarized to the few points listed below:

1. FMM buys from PAE using a formulated pricing that based on the London Metal Exchange (LME) plus a manufacturing cost ranging [REDACTED] *[FMM Purchase Price]*.
2. PAE will load the materials into a container and at the same time FMM will arrange for all the shipping details up to the Malaysia port (Klang).

3. FMM will then Invoice the Importer with a profit margin of [REDACTED] *[The Gross Profit Margin of FMM]* depending on different sections and different processes.
  4. 3 weeks after ship date the Importer receive the material in Australia.
  5. [REDACTED] *[The Payment Terms]* from ship date the importer will prepare payment to FMM.
- These 5 steps concludes the business deal between FMM, PAE, and [REDACTED] *[The Australian Importer]*.

#### Selling Price (Export)

The Export price that FMM are selling is not any cheaper than what FMM sells [REDACTED] *[Other similar business nature transactions by FMM]*. The prices are higher than what PAE is selling [REDACTED] *[Other similar business nature transactions by PAE]*. Payment terms are mostly [REDACTED] *[Description of difference in payment terms with other similar transactions]*. So comparatively, FMM does not see how selling into Australia at these pricing are injuring the industry as all other client and supplier that FMM worked with are in the similar range of pricing.

#### Conclusion

FMM has not dump prices on materials sold into Australia from commencement of business. FMM is willing to assist the Commission with any investigation activities. FMM business nature shouldn't have countervailing or dumping duties imposed.



.....  
SEAN CHONG  
Managing Director of  
FOCUS MERCHANT MANAGEMENT SDN BHD