



International Trade Remedies Branch

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14 NOV 2012

EXPORTER QUESTIONNAIRE - CHINA

PRODUCT CONCERNED: ZINC COATED (GALVANISED) STEEL
AND ALUMINIUM ZINC COATED STEEL
FROM THE PEOPLE'S REPUBLIC OF
CHINA, THE REPUBLIC OF KOREA AND
TAIWAN

INVESTIGATION PERIOD: 1 JULY 2011 TO 30 JUNE 2012

RESPONSE DUE BY: 27 OCTOBER 2012

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

CASE MANAGER: Ms Christie Sawczuk
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EMAIL: itrops2@customs.gov.au

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

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. ZHANG Hongyang
Position in the company: Legal consultant of IETC
Address: No.945 Heping Street, Qingshan, Wuhan, P.R.China
Telephone: +86 27 86892313
Facsimile number: +86 27 86564662
E-mail address of contact person: zhy602317@sohu.com

Factory:

Address: Ms. CHEN Jing
Telephone: +86 27 86892313
Facsimile number: +86 27 86891755
E-mail address of contact person: dtj197642@163.com

A-2 REPRESENTATIVE OF THE COMPANY FOR THE PURPOSE OF INVESTIGATION

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

Name: Mr. Andrew Percival
Organisation: Corrs Chambers Westgarth
Position: Special Counsel
Address: GPO Box 9925, Sydney NSW 2001
Telephone: (02) 9210 6228
Facsimile/Telex number: (02) 9210 6611
E-mail address of contact person: Andrew.Percival@corrs.com.au

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

A-3 COMPANY INFORMATION

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

Answer:

The legal name is International Economic and Trading Corporation Wugang Group (IETC). It is a company essentially engaged in export sales of a broad range of steel products. IETC does not use any other business names for exports or selling goods.

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

Answer:

IETC is wholly owned by [Confidential].

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

Answer:

The sole shareholder of [Confidential] is [Confidential].

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

Answer:

Not applicable.

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

Answer:

Please see the attached Exhibit A-3.5 Affiliation structure in the response of (WISCO), the related producer of the product concerned.

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

Answer:

There are no management fees/corporate allocations charged by IETC to the parent company or related companies.

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

Answer:

IETC is a trading company essentially engaged in export sales of [Confidential]. [Confidential]

[Information contained in the above annex cannot be susceptible of a meaningful non-confidential summary. This information is related to the Company's commercial activities and consists of sensitive business information, the disclosure of which would harm the Company's market and competitive position.]

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

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

Answer:

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

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

Answer:

Please refer to Annex **Exhibit A-3.9** for the internal organisation chart of IETC.

[Information contained in the above annex cannot be susceptible of a meaningful non-confidential summary. This information is related to the Company's commercial activities and consists of sensitive business information, the disclosure of which would harm the Company's market and competitive position.]

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

Answer:

The members of senior management are [Confidential].

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

Answer:

Please refer to Exhibit A-3.11 contained in the response of WISCO for the annual report of 2011 with the brochure of products produced by WISCO including the GUC.

12. Are any of your company's operations in a Special Economic Area, Economic and Technical Development Zone, Bonded Zone, Export Processing Zone, High Technology Industrial Development Zone, the Western Regions, or any other similarly designated area?

Answer:

No.

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13. If your answer to question A-3.12 above is 'yes':
- advise if any benefits (e.g. grants, reduced liabilities on commercial interest rates, etc) from the GOC (including central, provincial, municipal, county or any other level of government) accrue to your company because of being located in such an area;
 - please explain the nature of the operations, identify the specific zone(s) [or other area(s)] and provide a brief overview of all of the benefits of operating within the specified zone(s) or area(s).

Answer:

Not applicable.

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

Answer:

Please refer to the audit report of IETC for the detailed information of transactions among all related companies.

A-4 GENERAL ACCOUNTING/ADMINISTRATION INFORMATION

1. Indicate your accounting period.

Answer:

The financial accounting period is from January 1 to December 31 of each calendar year.

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

Answer:

The financial records are held at the location indicated under A.1.

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

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- These documents should relate to:
- the division or section/s of your business responsible for the production and sale of the goods under investigation, and
- the company overall.

Answer:

Please refer to Exhibit A-4.3.(1) for the chart of accounts of IETC. The audited consolidated financial statements and financial statements prepared for parent company of IETC and audited reports of [Confidential] are provided as Exhibit A-4.3.(2).

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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 relevant taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

Answer:

Not applicable.

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

Answer:

No. The accounting practices of IETC are line with the generally accepted accounting principles in China.

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);
- 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);
- valuation methods for damaged or sub-standard goods generated at the various stages of production;
- valuation methods for scrap, by products, or joint products;
- valuation and revaluation methods for fixed assets;
- average useful life for each class of production equipment and depreciation method and rate used for each;
- treatment of foreign exchange gains and losses arising from transactions;

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- treatment of foreign exchange gains/losses arising from the translation of balance sheet items;
- inclusion of general expenses and/or interest;
- provisions for bad or doubtful debts, and treatment thereof in your accounts;
- expenses for idle equipment and/or plant shut-downs;
- costs of plant closure;
- restructuring costs;
- by-products and scrap materials resulting from your company's production process; and
- effects of inflation on financial statement information.

Answer:

Please refer to the notes of the audit report regarding accounting policy of IETC for details.

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

Answer:

The accounting methods of IETC are remained unchanged during the past two years.

A-5 INCOME STATEMENT

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

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

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

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

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

Answer:

Please refer to Exhibit A-5 for the spreadsheet entitled 'Income statement' for the detailed information required.

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[This confidential information is provided for this investigation. Since such information is highly sensitive commercial information, please refer to a summary of that information in an indexed form.]

A-6 SALES

Complete the spreadsheet entitled '**Turnover**' within the *Galvanised steel - Exporter Questionnaire – CHINA – accompanying spreadsheet* provided alongside this questionnaire.

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

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

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

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

Answer:

Please refer to Exhibit A-6 for the spreadsheet entitled 'Turnover' for the detailed information required.

[This confidential information is provided for this investigation. Since such information is highly sensitive commercial information, please refer to a summary of that information in an indexed form.]

SECTION B - SALES TO AUSTRALIA (EXPORT PRICE)
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This section requests information concerning your export practices and prices to Australia. You should include costs incurred beyond ex-factory.

Export prices are usually assessed at FOB point, but Customs and Border Protection may also compare prices at another level (e.g. ex factory).

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

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

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

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

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

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

Answer:

[Confidential] [Confidential details concerning IETC's Australian customer]

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.

Answer:

[Confidential]

[Information contained in the above annex cannot be susceptible of a meaningful non-confidential summary. This information is related to the Company's commercial activities and consists of sensitive business information, the disclosure of which would harm the Company's market and competitive position.]

- (b) Identify each party in the distribution chain and describe the functions performed by them. Where commissions are paid indicate

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whether it is a pre or post exportation expense having regard to the date of sale.

Answer:

Please see the explanation provided under (a) above.

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

Answer:

All the shipments to Australia by IETC are on [Confidential] terms, which means that ownership of the goods is transferred to the buyer at the point of [Confidential].

- (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).

Answer:

No.

- (e) Explain in detail the process by which you negotiate price, receive orders, deliver, invoice and receive payment. If export prices are based on price lists supply copies of those lists.

Answer:

[Confidential]

[Confidential]

No export price list is used for the goods exports to Australia.

[Information contained in the above annex cannot be susceptible of a meaningful non-confidential summary. This information is related to the Company's commercial activities and consists of sensitive business information, the disclosure of which would harm the Company's market and competitive position.]

- (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).

Answer:

[Confidential]

[Information contained in the above annex cannot be susceptible of a meaningful non-confidential summary. This information is related to the

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Company's commercial activities and consists of sensitive business information, the disclosure of which would harm the Company's market and competitive position.]

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

Answer:

Please see the answer above.

- 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.

Answer:

No. IETC has only one distribution channel.

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

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

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

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

Answer:

Please refer to Exhibit B-4 for the spreadsheet entitled "Australian sales" that have been separately prepared by IETC and Wugang (Australia). The later one includes the information of reselling to unrelated customers in Australia.

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

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Answer:

Not applicable.

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

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

Answer:

There is no discount, rebate or allowance offered on export sales to Australia.

- 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.

Answer:

IETC did not issue credit notes for the exports to Australia during the investigation period.

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

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

Answer:

Not applicable.

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B-9 Select two shipments of each product (*galvanised steel*), 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.

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

Answer:

Please refer to **Exhibit B-9** for the shipments documents relating to exports of the product concerned to Australia, which contain purchase order, commercial invoice, bill of lading, freight invoices and payment.

[Information contained in the above annex cannot be susceptible of a meaningful non-confidential summary. This information is related to the Company's commercial activities and consists of sensitive business information, the disclosure of which would harm the Company's market and competitive position.]

SECTION C – EXPORTED GOODS & LIKE GOODS
--

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

Answer:

The goods exported by IETC to Australia during the investigation period is hot dipped galvanized steel coil which applied the steel grade {Confidential] or [Confidential].

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

Answer:

Please refer to **Exhibit C-2** for the list of all models exported to Australia.

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

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

Answer:

Please refer to **Exhibit C-3** for the spreadsheet entitled “like goods”.

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

Answer:

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Please refer to the answers provided of WISCO which is involved in the domestic sales of the product concerned.

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

If the Case Manager agrees that it is not possible to obtain a complete listing he or she will consider a method for sampling that meets Customs and Border Protection requirements. If agreement cannot be reached as to the appropriate method Customs and Border Protection may not visit your company.

Customs and Border Protection will normally take the invoice date as being the date of sale in order to determine which sales fall within the investigation period.

*If, in response to question B4 (Sales to Australia, Export Price), you have reported that the date of sale is not the invoice date and you consider that this alternative date should be used when comparing domestic and export prices you **must** provide information on domestic selling prices for a matching period - even if doing so means that such domestic sales data predates the commencement of the investigation period.*

If you do not have any domestic sales of like goods you must contact the Case Manager who will explain the information Customs and Border Protection requires for determining a normal value using alternative methods.

Answer:

Please note that IETC and [Confidential] are not involved in the domestic sales of the product concerned. This section is not applicable to both [Confidential] companies. With regard to the details of domestic sales, please refer to the separate response of WISCO.

SECTION E - FAIR COMPARISON

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

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

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

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

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

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

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

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

E-1 COSTS ASSOCIATED WITH EXPORT SALES

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

1. Transportation

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

Answer:

The inland freight covers the transportation from the warehouse to export ports in China which is reported on an actual basis. It is recorded as selling expense of the accounting. A sample of payment of the inland transportation is provided in the documents relating to exports as Exhibit B-9.

Exhibit B-9 is confidential.

2. Handling, loading and ancillary expenses

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

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

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

Answer:

The handling and ancillary expenses include charges and fees at ports which are reported on an actual basis. They are recorded as selling expense of the accounting. Please note that some columns in the spreadsheet “Australia sales” remain blank for the reason that the charges are not settled yet by the time of preparing this response.

3. Credit

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

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

Answer:

Not applicable.

4. Packing costs

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

Answer:

Not applicable.

5. Commissions

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

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

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

Answer:

Not applicable.

6. Warranties, guarantees, and after sales services

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

Answer:

Not applicable.

7. Other factors

There may be other factors for which an adjustment is required if the costs affect price comparability – these are identified in the column headed **“Other factors”**. For example, other variable or fixed selling expenses, including salesmen’s salaries, salesmen’s travel expenses, advertising and promotion, samples and entertainment expenses. Your consideration of questions asked at Section G, concerning domestic and export costs, would have alerted you to such other factors.

Answer:

Not applicable.

8. Currency conversions

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

Answer:

Not applicable.

E-2 COSTS ASSOCIATED WITH DOMESTIC SALES

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

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

Answer:

Please refer to the separate response of WISCO for the detailed information of costs associated with domestic sales.

E-3 DUPLICATION

In calculating the amount of the adjustments you must ensure that there is no duplication.

For example:

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

Separate adjustment items must avoid duplication.

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

Answer:

Not applicable.

SECTION F - EXPORT SALES TO COUNTRIES OTHER THAN AUSTRALIA

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

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

- F-1** Complete the spreadsheet entitled '**Third country sales**' within the *Galvanised steel - Exporter Questionnaire – CHINA – accompanying spreadsheet* provided alongside this questionnaire.

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

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

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

Answer:

Please refer to **Exhibit F-1** for the spreadsheet entitled "Third country sales".

[Information contained in the above annex cannot be susceptible of a meaningful non-confidential summary. This information is related to the Company's commercial activities and consists of sensitive business information, the disclosure of which would harm the Company's market and competitive position.]

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

Answer:

There are not any differences between the products sold to Australia and other third countries.

SECTION G - COSTING INFORMATION AND CONSTRUCTED VALUE
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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 GUC - 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 (GUC) 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.

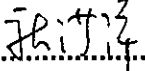
Answer:

Please note that IETC and [Confidential] are not involved in the production of the product concerned. This section relating to production and cost is not applicable to the both [Confidential] companies. With regard to the details of costing information, please refer to the separate response of WISCO.

SECTION H – EXPORTER/PRODUCER'S DECLARATION

I hereby declare that International Economic and Trading Corporation, Wugang Group did, during the investigation period export the GUC and have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

Name :.....Zhang Hongyang.....

Signature:.....

Position in
Company :.....Legal Counsel.....

Date :.....26 October ,2012.....

International Economic and Trading Corporation Wugang Group
NON-CONFIDENTIAL VERSION

SECTION I - CHECKLIST

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

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

Electronic Data	Please tick if you have provided spreadsheet
INCOME STATEMENT	√
TURNOVER – sales summary	√
AUSTRALIAN SALES – list of sales to Australia	√
DOMESTIC SALES – list of all domestic sales of like goods	N/A
THIRD COUNTRY – third country sales	√
PRODUCTION – production figures	N/A
DOMESTIC COSTS – costs of goods sold domestically	N/A
AUSTRALIAN COSTS – costs of goods sold to Australia	N/A
HRS PURCHASES – purchase cost of HRS during the investigation period	N/A

International Economic and Trading Corporation Wugang Group

Non-Confidential

A-6 SALES SUMMARY

		All Products		Galvanized Steel	
		Most recent completed financial year		Investigation period: 1 July 2011 - 30 June 2012	
		Volume (MT)	Value (RMB)	Volume (MT)	Value (RMB)
Total company turnover (all products)	公司总营业额（所有产品）		100	100	100
domestic market	国内销售	N/A	N/A	N/A	N/A
exports to Australia	出口澳大利亚	100	0.05	4	4
exports to other countries	出口第三国	13,215	6	95	96
Turnover of the sector including the goods	涉案产品部门（镀锌钢产品所属部门）营业额	13,509	6	-	-
domestic market	国内销售	N/A	N/A	N/A	N/A
exports to Australia	出口澳大利亚	100	0	4	4
exports to other countries	出口第三国	13,215	6	95	96
Turnover of the goods	涉案产品（镀锌钢）营业额	4,452	2	-	-
domestic market	国内销售	N/A	N/A	N/A	N/A
exports to Australia	出口澳大利亚	85	0	4	4
exports to other countries	出口第三国	4,339	2	95	96

COMMERCIAL IN CONFIDENCE (when complete)