



Australian Government

Australian Customs and  
Border Protection Service

PUBLIC FILE

**International Trade Remedies Branch**

**EXPORTER QUESTIONNAIRE - CHINA**

**Shanghai Minmetals Materials & Products Corp.**

**PRODUCT CONCERNED:** HSS FROM THE PEOPLE'S REPUBLIC OF CHINA, THE REPUBLIC OF KOREA, MALAYSIA, TAIWAN AND THE KINGDOM OF THAILAND

**INVESTIGATION PERIOD:** 1 JULY 2010 TO 30 JUNE 2011

**RESPONSE DUE BY:** 2 NOVEMBER 2011

**ADDRESS FOR RESPONSE:** International Trade Remedies Branch  
Australian Customs and Border  
Protection Service  
5 Constitution Avenue  
Canberra act 2601  
Australia  
Attention: Director Operations 3

**CASE MANAGER:** Ms Andrea Stone

**TELEPHONE:** +61-2-6275-6173

**FAX:** +61-2-6275-6990

**EMAIL:** [tmops3@customs.gov.au](mailto:tmops3@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:** *Shanghai Minmetals Materials & Products Corp.*  
(Hereinafter referred to as "Shanghai MM")

Name: *Mr. Cui Mingyao*  
Position in the company: *Deputy Manager*  
Address: *15/F., No.757 Guangfu Road, Shanghai, China*  
Telephone: *+86-21-63815858-1513*  
Facsimile number: *+86-21-63803536*  
E-mail address of contact person: *cui\_mingyao@smmlec.com*

**Producer No.1 (an unrelated 3<sup>rd</sup> party)**

**Factory:** *Huludao City Steel Pipe Industrial Co., Ltd.*  
Address: *Cishan Village, Lianwan Town, Longgang District, Huludao City, Liaoning, China*  
Telephone: *+86-429-2058666*  
Facsimile number: *+86-429-2058333*  
E-mail address of contact person: *china\_sevenstar@126.com*

**Producer No.2 (an unrelated 3<sup>rd</sup> party)**

**Factory:** *Zhejiang Kingland Pipeline and Technologies Co. Ltd.*  
Address: *No.57 Erliqiao Road, Huzhou City, Zhejiang, China*  
Telephone: *+86-572-2072542*  
Facsimile number: *+86-572-2066981*  
E-mail address of contact person: *xjf9983@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. LAN Xiong*  
Organisation: *Beijing B&H Associates*  
Position: *Partner*  
Address: *RM.1205 Beiguang Plaza, No. 23 Huangsi Street, Beijing*  
Telephone: *+86-10-82230597*  
Facsimile/Telex number: *+86-10-82230598*  
E-mail address of contact person: *lx@bohenglaw.com*

*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.*

Please refer to attached power of attorney.

### A-3 COMPANY INFORMATION

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

**Answer:** *Shanghai Minmetals Materials & Products Corp. (hereinafter referred to as "Shanghai MM") is a trading company and does not use any other business names to export and/or sell goods.*

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:** *Shanghai MM is wholly owned by Shanghai Metals and Minerals Import and Export Corporation.*

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

**Answer:** *Shanghai Metals and Minerals Import and Export Corporation is a state-owned company.*

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 refer to Exhibit A-1 for corporate structure diagram.*

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

**Answer:** *Not applicable, as there has no management fees/corporate allocations charged to Shanghai MM by its related companies.*

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

**Answer:** *Shanghai MM is a trading company.*

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

**Answer:** *The GUC is produced by Producer No.1 and Producer No.2, whose addresses and contact details are provided in the answer to question A-1.1.*

- sell in the domestic market

**Answer:** *Shanghai MM does not sell the GUC in China. Producer No.1 and Producers No.2 carry out their own domestic sales.*

- export to Australia, and

**Answer:** *Shanghai MM exports the GUC to Australia.*

- export to countries other than Australia.

**Answer:** *Shanghai MM exports GUC to countries other than Australia.*

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

**Answer:** *Please refer to Exhibit A-2 for Shanghai MM's internal organization chart.*

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

**Answer:** *Please refer to Exhibit A-3 for the list of senior managements. And please note that Shanghai MM does not have a board of directors.*

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-4 for Shanghai MM's brochure, and please note that Shanghai MM does not have annual reports.*

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:** *Shanghai MM does not locate in the above mentioned areas.*

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 as Shanghai MM does not locate in the above mentioned areas.*

## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

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:** *Shanghai MM does not purchase raw material or GUC from its related parties, nor does it sell raw material or GUC to its related parties.*

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

1. Indicate your accounting period.

**Answer:** *January 1st to December 31st, per annum.*

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

**Answer:** *15/F., No.757 Guangfu Road, Shanghai, China.*

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;

**Answer:** *Please refer to Exhibit A-5 for Shanghai MM's chart of accounts.*

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

**Answer:** *Please refer to Exhibit A-6 for 2009 and 2010 audited reports.*

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

These documents should relate to:

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

**Answer:** *Please refer to Exhibit A-7 for the quarterly financial reports during the investigation period.*

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

**Answer:** *Not applicable and please refer to Exhibit A-6 for audited reports.*

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

**Answer:** *Not applicable, as Shanghai MM's accounting is in accordance with the generally accepted accounting principles in China.*

5. Describe:

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

- the method of valuation for raw material, work-in-process, and finished goods inventories (eg last in first out –LIFO, first in first out- FIFO, weighted average);
- costing methods, including the method (eg by tonnes, units, revenue, direct costs etc) of allocating costs shared with other goods or processes (such as front office cost, infrastructure cost etc);
- 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;
- 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 Exhibit A-8 for the summary of Shanghai MM's significant accounting policies.*

*Please kindly note that Shanghai MM is a trading company, therefore, foregoing questions related to manufacturing accounting, plant shut-downs & closures, scrap & by-products, etc are not applicable.*

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

**Answer:** *There has no material change to accounting policies over the last two years.*

#### A-5 INCOME STATEMENT

Complete the spreadsheet entitled '**Income statement**' within the *HSS 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.

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:**     *Exhibit A-9 is the Income Statement completed in the prescribed format, and this spreadsheet is also provided in electronic format.*

#### **A-6    SALES**

Complete the spreadsheet entitled '**Turnover**' within the *HSS 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:**     *Exhibit A-10 is the Turnover spreadsheet completed in the prescribed format, and this spreadsheet is also provided in electronic format.*

**SECTION B - SALES TO AUSTRALIA (EXPORT PRICE)**

*This section requests information concerning your export practices and prices to Australia. You should include costs incurred beyond ex-factory.*

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

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

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

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

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

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

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

**Answer:** *Please refer to Exhibit B-1 for the list of Australian customers.*

**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:** *Shanghai MM purchase the GUC from Producer No.1 or Producer No.2, then provide notice to the Australian customers of estimated goods ready date. The Australian customers charter vessel space for loading. Upon the receipt of notice from appointed shipping liner of carrying vessel movement, Shanghai MM instructs the producers to transport goods to designed loading port (usually Tianjin or Shanghai). The goods are shipped to Australia, then Shanghai MM forward the original shipping documents including Bill of Lading to the Australian customer, then delivery is completed.*

- (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.



## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

**Answer:** *Producer No.1 and Producer No.2 are the producers of the GUC. Shanghai MM is the exporter of the pipe. The Australian customers are distributors, selling to the distribution sector. No commissions are paid by Shanghai MM through this chain.*

- (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:** *Shanghai MM sells to Australian customers on an FOB or FAS basis, so ownership effectively immediately passes to those customers once the goods are on the ship.*

- (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:** *Not applicable, as Shanghai MM did not have agency or distributor agreements with Australian customers.*

- (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:** *The Australian customers collect the orders from Australian marketplace, then forwards a summary "offer" to purchase certain goods from Shanghai MM.*

*Shanghai MM then confirms acceptance of this offer and contact the producers to arrange production.*

*After delivery of the goods by the producers, Shanghai MM issues commercial invoice and prepares for shipping documents.*

*Upon the receipt of original shipping documents, the Australian customers release the payment to Shanghai MM's bank accounts.*

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

**Answer:** *Shanghai MM is not related to any Australian customers in any way.*

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

**Answer:** *Not applicable, as Shanghai MM does not issue the forward order in the normal course of business.*

- 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:** *Not applicable, as Shanghai MM's Australian customers are all in the same trade level, i.e. distributors.*

- B-4** Complete the spreadsheet entitled 'Australian sales' within the *HSS 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.

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.
Finish	identify the finish of the HSS sold
Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale, report that date. For example, order confirmation, contract, or purchase order date.
Order number	if applicable, show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Shipping terms	Delivery terms eg. CIF, C&F, FOB, DDP (in accordance with Incoterms)
Payment terms	agreed payment terms eg. 60 days=60 etc
Quantity	Quantity in units shown on the invoice. Show basis eg kg.
Gross invoice value	gross invoice value shown on invoice in the currency of sale, <i>excluding taxes</i> .
Discounts	if applicable, the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Rebates	The amount of any deferred rebates or allowances paid to the importer in the currency of sale.

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

Notes

\*\* FOB export price and Ocean Freight:

## PUBLIC FILE NON-CONFIDENTIAL VERSION

**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.

**Answer:** *Exhibit B-2 is the spreadsheet of Australian Sales, and this spreadsheet is also provided electronically.*

- 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.

**Answer:** *During the investigation period, the VAT refund rate for GUC is 9%, therefore Shanghai MM incurs VAT cost for those Australia sales. We added a column named "other costs-VAT cost" and applied 8%, i.e. the difference between VAT refund rate (9%) and the standard VAT rate (17%) to report this cost.*

- 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:** *Not applicable, as Shanghai MM did not offer any discount, rebate or allowance in Australian sales during the investigation period.*

- 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.

**PUBLIC FILE      NON-CONFIDENTIAL VERSION**

**Answer:**      *Not applicable, as Shanghai MM did not issue credit notes to Australian customers.*

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

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

**Answer:**      *Not applicable, as all delivery terms were FOB or FAS and Shanghai MM is not responsible for arrival of the goods at an agreed point within Australia.*

**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.

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

**Answer:**      *Please refer to Exhibit B-3 for two sets of Australian exporting sales documentations during the investigation period.*

**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:** *Commodity: AS1074/BS1387 latest edition black and galvanized circular hollow sections (i.e. pipe) of various wall thicknesses and outside diameters. Pipe can have plain ends, threaded ends, or threaded & coupled ends.*

- 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:** *Sales categories for goods exported to Australia are:  
Black Circular ("BC")  
Black Square or rectangular ("BS")  
Galvanised Circular ("GC")  
Galvanised Square or rectangular ("GS")*

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

This should be done by completing the spreadsheet entitled 'Like goods' within the HSS Exporter Questionnaire – CHINA – accompanying spreadsheet provided alongside this questionnaire, detailing as follows:

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

**Answer:** *Please see the following table:*

EXPORTED MODEL	DOMESTIC MODEL	IDENTICAL?	DIFFERENCES
BC	BC	Yes	n/a
BS	BS	Yes	n/a
GC	GC	Yes	n/a

PUBLIC FILE

NON-CONFIDENTIAL VERSION

GS	GS	Yes	n/a
----	----	-----	-----

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

**Answer:** *Please refer to producers' submissions as Shanghai MM does not produce the GUC.*

**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:**      ***Questions in this section are not applicable as Shanghai MM did not sell the GUC in China during the investigation period.***

**D-1**      Provide:

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

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

**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.

**D-3**      Explain in detail the sales process, including:

- the way in which you set the price, receive orders, make delivery, invoice and finally receive payment; and the terms of the sales; and
- whether price includes the cost of delivery to customer.

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



## NON-CONFIDENTIAL VERSION

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

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

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

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

Column heading	Explanation
Customer name	names of your customers. If an English version of the name is not easily produced from your automated systems show a customer code number and in a separate table list each code and name.
Level of trade	the level of trade of your domestic customer
Model/grade/type	commercial model/grade or type
Product code	code used in your records for the model/grade/type identified. Explain the product codes in your submission.
Finish	The finish of the HSS
Invoice number	invoice number
Invoice date	invoice date
Date of sale	refer to the explanation at the beginning of this section. If you consider that a date <i>other than</i> the invoice date best establishes the material terms of sale and should be used, report that date. For example, order confirmation, contract, or purchase order date.
Order number	show order confirmation, contract or purchase order number if you have shown a date other than invoice date as being the date of sale.
Delivery terms	eg ex factory, free on truck, delivered into store
Payment terms	payment terms agreed with the customer eg. 60 days=60 etc
Quantity	quantity in units shown on the invoice eg kg
Gross Invoice value	gross value shown on invoice <i>in the currency of sale</i> , net of taxes.
Discounts	the amount of any discount deducted on the invoice on each transaction. If a % discount applies show that % discount applying in another column.
Rebates	The amount of any deferred rebates or allowances paid to the importer in the currency of sale.
Net invoice value	the net invoice value expressed in your domestic currency as recorded in your accounting system
Other discounts	The actual amount of discounts not deducted from the invoice. Show a separate column for each type of discount.
Packing*	packing expenses
Inland	amount of inland transportation costs included in

transportation Costs*	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.

**Notes**

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

- 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.
- D-6** For each type of commission, discount, rebate, allowance offered on domestic sales of like goods:
- provide a description; and
  - explain the terms and conditions that must be met by the customer to qualify for payment.

Where the amounts of these discounts, rebates etc are not identified on the sales invoice, explain how you calculated the amounts shown in your response to question D4.

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

- 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

**PUBLIC FILE****NON-CONFIDENTIAL VERSION**

Customs and Border Protection will select additional sales for verification at the time of our visit.

**SECTION E - FAIR COMPARISON**

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

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

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

To be able to quantify the level of any adjustment it will usually be necessary to examine cost differences between sales in different markets. 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.

**Answer:** Shanghai MM buys on FOB basis and sells to Australia on FOB or FAS basis, and has no domestic sales against which to compare. Therefore, certain following questions will be answered by the producers.

**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.

## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

**Answer:** *Not applicable as Shanghai MM takes delivery at the port. Please refer to the submissions by the producers.*

## 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:** *Where applicable, these costs have been shown against specific sales on the Australian Sales spreadsheet.*

## 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 eg. short term borrowing in the currency concerned.

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

**Answer:** *Not applicable as the payment terms are L/C or T/T, payable at sight of commercial documents. No credit cost was incurred.*

## 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, as Shanghai MM takes delivery at the port, which goods are already packed for shipment.*

## 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:** *No commission was paid by Shanghai MM to any party in relation to sales to Australia.*

**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:** *No warranty or guarantee is offered, and no technical or other services are provided. Claims for defective product, transport damage and the like are considered and resolved on a case by case basis.*

**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.*

**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 (ie. 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.

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

## 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 please provide **full** details about the operation of the scheme as well as providing the information requested above.

**Answer:** *It is Shanghai MM's understanding that both producers make steel pipe for domestic and export purposes from hot-rolled steel produced entirely within China, i.e. not from imported raw materials.*

### 3. Level of trade

Question D-4 asks you to indicate the level of trade to the domestic customer. To claim an adjustment for level of trade differences you will need to quantify the amount by which level of trade influences price.

Trade level is the level a company occupies in the distribution chain. The trade level to which that company in turn sells the goods and the functions carried out distinguish a level of trade. Examples are producer, national distributor, regional distributor, wholesaler, retailer, end user, and original equipment manufacturer.

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

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

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

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

This requires the following information:

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

or



## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

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

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

#### 4. Credit

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

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

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

Provide the applicable interest rate over 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:

<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.

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

2. Calculate the average credit period

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

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

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

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

5. Transportation

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

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

6. Handling, loading and ancillary expenses

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

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

7. Packing

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

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

8. Commissions

For any commissions paid in relation to the domestic sales:

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

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

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

**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.

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

**10. Other factors**

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

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

**Answer:** *Not applicable, Shanghai MM does not make domestic sales of the GUC.*

**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:** *Noted.*

## 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 *HSS 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.

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

**Answer:** *A list of sales of the GUC to countries other than Australia during the investigation period is included as Exhibit F-1.*

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

## PUBLIC FILE

NON-CONFIDENTIAL VERSION

**Answer:**

*Goods sold within Asia, into Europe and the Caribbean are generally made to the BS1387 standard and are considered like goods to those sold in Australia.*

*Goods sold to the USA are generally to the higher standard ASTM A53 and are not considered like goods.*

*More detail of third country sales can be provided if required by Customs.*

**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 GUC - ie of the goods exported to Australia; and
- making certain adjustments to the normal value.

You will need to provide the cost of production of both the exported goods (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 (eg. non-operating expenses not included elsewhere) associated with the goods.

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

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

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

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

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

**G-1 PRODUCTION PROCESS AND CAPACITY**

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

**Answer:** Not applicable, as Shanghai MM does not produce the GUC.

2. Complete the spreadsheet entitled 'Production' within the HSS 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.

**Answer:** Not applicable, as Shanghai MM does not produce the GUC.

**G-2. COST ACCOUNTING PRACTICES**

## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

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

**Answer:** *As a trading company, Shanghai MM operates an actual costing system. The full cost of the goods exported to Australia is the invoice value for the goods purchased from the produce.*

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

**Answer:** *Not applicable, Shanghai MM's cost accounting system is not based on standard costs.*

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

**Answer:** *There was no significant or unusual cost variances occurred during the investigation period.*

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

**Answer:** *Not applicable, as Shanghai MM does not use profit/cost centres.*

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

**Answer:** *Not applicable, as Shanghai MM does not use profit/cost centres.*

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

**Answer:** *As a trading company, Shanghai MM does not capture revenue or cost by product or grade in the accounting system.*

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

**Answer:** *Not applicable, as Shanghai MM does not value costs differently for cost accounting purposes and financial accounting purposes.*

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

**Answer:** *Not applicable, as Shanghai MM did not engaged in any start-up operations in relation to the GUC during the investigation period.*

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

**Answer:** *Not applicable, as Shanghai MM did not engaged in any start-up operations in relation to the GUC during the investigation period.*

**PUBLIC FILE      NON-CONFIDENTIAL VERSION**

**G-3    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. Complete the spreadsheet entitled 'Domestic CTMS' within the *HSS 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 doing so, provide 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.

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.

If you are unable to supply this information in this format, please contact the Case Manager for this investigation at the address shown on the cover of this questionnaire.

Please specify unit of currency.

**Answer:**      *Not applicable, Shanghai MM does not produce the GUC and does not sell the GUC on domestic market.*

**G-4    COST TO MAKE AND SELL GOODS UNDER CONSIDERATION (GOODS EXPORTED TO AUSTRALIA)**

Complete the spreadsheet entitled 'Australian CTMS' within the *HSS 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 doing so, provide 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.

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.

<sup>2</sup> Customs and Border Protection 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.



If you are unable to supply this information in this format, please contact the Case Manager for this investigation at the address shown on the cover of this questionnaire.

Please specify unit of currency.

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

**Answer:** *Please refer to Exhibit G-1 for Australian CTMS spreadsheet which is also provided electronically.*

**G-5** 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.

**Answer:** *Not applicable.*

**G-6** 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.

**Answer:** *Not applicable.*

**G-7** In calculating the unit cost to make and sell, provide an explanation if the allocation method used (eg number, or weight etc) to determine the unit cost differs from the prior practice of your company.

**Answer:** *Not applicable.*

**G-8** List major raw material costs, which individually account for 10% or more of the total production cost.

For these major inputs:

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

Where the major input is produced by an associate of your company Customs and Border Protection 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 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.

## PUBLIC FILE

NON-CONFIDENTIAL VERSION

If the major input is purchased or supplied from an integrated production process you should provide detailed information on the full costs of production of that input.

**Answer:** *Shanghai MM is a trading company without any production of the GUC. Please refer to Exhibit G-1 for the Australian CTMS.*

**SECTION H – PARTICULAR MARKET SITUATION**

*The applicants claim that a 'market situation' exists in respect of HSS from China due to government influence on both the prices of the goods and the major raw material inputs (HRC and/or narrow strip – collectively referred to as hot rolled steel or HRS) used in the manufacture of the goods.*

*The existence of a 'market situation' could affect Customs and Border Protection's approach to calculating normal value within its duping assessment.*

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

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

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

*It may be necessary for Customs and Border Protection to request additional information following receipt and review of your response.*

There are three parts to this section:

- PART H-1 - Requests information concerning the organisation of your company and the GOC's involvement in the business of your company.
- PART H-2 - Requests information concerning the GOC's measures with respect to the steel industry in China.
- PART H-3 - Requests information concerning the HSS sector in the region where your company is located.

**Answer:** *Shanghai MM is a trading company operates import and export sales of a wide range of products, and did not manufacture GUC and purchase related inputs as mentioned.*

*Moreover, Shanghai MM is not a member of CISA (China Iron & Steel Association) or any other Chinese/international steel business associations, and is not a member/participator of Chinese steel industry. Therefore, this section is not applicable to Shanghai MM.*

*And Shanghai MM understand that there were no governmental influence in the export or domestic selling price setting of GUC and its related inputs in China.*

**PART H-1 GENERAL INFORMATION**

## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

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

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

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

- a) reporting requirements;
- b) payment of taxes;
- c) senior management representation within your business;
- d) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions);
- e) licensing;
- f) restrictions on land use;
- g) provision of loans; or
- h) provision of grants, awards or other funds.

2. **Business structure, ownership and management**

- a) Indicate whether your company is an SOE (refer to the Glossary of Terms for definition).
- b) List the Board of Directors and Board of Shareholders of your business and all other entities/businesses your business is related to.

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

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

If so, identify the individuals, their role on that Board and their affiliation with the GOC.

- d) Does your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders have a representative from the Chinese Communist Party (CCP)? If so, identify their name and title and indicate their position at the board level.
- e) Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders appointed, managed or recommended by the GOC? If so, identify the government department(s) they represent.
- f) Indicate who owns what percentage of all shares in your business and identify whether they are:
  - an affiliate, representative, agency or otherwise representative of the GOC;

- employees of your business;
  - foreign investors; or
  - other (please specify).
- g) Provide the details of any significant changes in the ownership structure of your business during the investigation period.
- h) Identify any positions within your business that are appointments or designated to act on behalf of GOC authorities.
- i) Explain whether there are requirements in law and in practice to have government representation at any level of your business. If there is such a requirement, explain the role of government representatives appointed to any level of your business.
- j) If your business is a publicly-traded company, what are the rules regarding the issuance of shares by your business? Identify any stock exchanges on which your business is listed.
- k) Who has the ability to reward, fire or discipline your business' senior managers?
- l) Do any of your company's senior managers hold positions in any GOC departments or organisations, associations or Chambers of Commerce? If so describe the nature of these positions.
- m) Provide the names and positions of your company's pricing committee.

### 3. Licensing

- a) Provide a copy of your business license(s).
- b) Identify the GOC departments or offices responsible for issuing the license(s).
- c) Describe the procedures involved in applying for the license(s).
- d) Describe any requirements or conditions that must be met in order to obtain the license(s).
- e) Describe and explain any restrictions imposed on your business by the business license(s).
- f) Describe any sanctions imposed on your business if you act outside the scope of your business license(s).
- g) Describe and explain any rights or benefits conferred to your business under the license(s).
- h) Describe the circumstances under which your business license(s) can be revoked, and who has the authority to revoke the license(s).

### 4. Decision-making, planning and reporting

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

## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

- (i) what goods are produced;
  - (ii) how the goods are produced;
  - (iii) how levels of inputs such as raw materials, labour and energy are set and secured;
  - (iv) how the use of your outputs, such as how your product mix is determined; and
  - (v) how your business' profit is distributed, etc., is determined.
- b) Provide a description of any GOC input into the decision-making process respecting your manufacture, marketing and sale of steel products.
  - 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.
  - d) List and describe all reports that must be submitted to the GOC periodically by your company, and identify the government department/office where each report is filed.
  - e) Provide a copy of the last two Provincial/City Five Year Plans (including the appendices) for the province/city in which your business is located, whichever is applicable. The copies should be fully translated including the appendices, along with the original Chinese version.
  - f) Does your business develop any five-year plans or similar planning documents? If so, provide copies of these plans and advise whether these plans have been submitted, reviewed or approved by the GOC (including the National Development and Reform Commission).
  - g) Provide copies of the minutes of your Board of Directors and Board of Shareholders meetings over the investigation period.
  - h) Provide copies of the notes to company meetings where pricing decisions on steel products have been made over the investigation period.

**PART H-2 GOC MEASURES IN THE STEEL SECTOR**

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

1. Are there any other GOC opinions, directives, decrees, promulgations, measures, etc. concerning the steel industry/sector that were put in place or operating during the investigation period?  
  
If yes, please provide a copy of that documentation and a translation as well. Also provide documentation concerning the GOC or any association of the GOC's notification of the measures concerning steel to your company over the investigation period.
2. Provide information concerning the name of any GOC departments, bureaus or agencies responsible for the administration of all GOC measures concerning the steel industry in the regions, provinces or special economic zones where your company is located.

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

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

### 3. National Steel Policy

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

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

- Explain the procedure to be followed by a steel company in making a request for approval of a steel investment for an existing steel enterprise or new steel enterprise.
  - Identify any GOC bodies at the regional or provincial level that have the responsibility to grant the approval, or refuse approval regarding an investment in the steel sector.
  - Are review and approval decisions regarding investments in the steel sector made by the central government or are they delegated to the regional or provincial level?
- i) Describe the role of the NDRC in terms of communicating, implementing and overseeing policies governing the steel sector, including but not limited to, China's National Steel Policy.

#### 4. Other government approvals

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

- a) Explain whether your company has undertaken an approval process through the GOC for any steel investments in the last 10 years.
- b) Explain whether any applicable investments received the necessary approval and if so, provide documentation confirming this approval.
- c) If your investment was not approved, provide the reasons given for the refusal.
- d) Describe the process your company has to follow to obtain these approvals.
- e) Provide a translated copy of the application form along with the original Chinese version.
- f) Identify the office that sent communication of these requirements to your company along with the office address, contact names, phone numbers and fax numbers.

#### 5. Steel industry rationalisation

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

- a) Describe to what extent, if any, your company has been directed, encouraged or requested to merge or consolidate operations with one or several other steel in China either by the National Development and Reform Commission or any other entities.
- b) Describe to what extent, if any, a facility owned by your company has ever been identified by the GOC as a candidate for closure within the next two years.

#### PART H-3 THE HSS SECTOR



**PUBLIC FILE      NON-CONFIDENTIAL VERSION**

The information requested in this part will assist in providing a better understanding of the GOC measures and your business' sales and production of HSS.

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

**1. Export quotas and licensing**

- a) Are HSS sold by your company subject to any export quotas?

If so, explain why HSS are subject to quotas and the method by which the quotas are allocated.

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

- b) If HSS is not presently subject to export quotas, indicate if quotas existed during the investigation period and when and why they were removed.
- c) Identify which GOC agency legislates and monitors any such quotas.
- d) Has the GOC set any targets or limits regarding the quantity of HSS that you may sell on the domestic or export markets? If so, provide details.
- e) Are there any export licence requirements for HSS? If so, provide details.

**2. Taxation**

- a) Were there any export taxes on the exports of HSS during the investigation period?
- b) What was the VAT rebate applicable to HSS exports during the investigation period?
- c) Have there been any changes to the value-added tax rebate applicable to steel exports in the last 5 years? If yes, provide:
- i. a detailed chronological history of the value-added tax rebate rates;
  - ii. products affected;
  - iii. the effective dates of the rate changes;
  - iv. fully translated copies of any GOC notices regarding these changes, including the relevant appendices.
- d) Are you aware of any tax changes being planned that would impact the HSS sector?

**3. Sales terms**

- a) Identify the person who authorises the sales terms, prices and other contract provisions for the sale of HSS by your business.
- b) Explain how the selling prices of HSS by your business are determined, including any GOC involvement in your business' pricing decisions, and indicate if the goods are subject to GOC direct or indirect pricing or government guidance pricing.

- c) Does your business coordinate the selling prices or supply of HSS with other domestic steel and steel product producers, any GOC departments, or the China Iron and Steel Association? If so, provide details.
- d) Explain whether your business provides HSS price information/data to the GOC, the China Iron and Steel Association (CISA), other government officials or commercial/industry organisations, including those outside of China, which report on the steel sector.
- e) Explain whether your business provides HSS price data to any other person at the provincial, regional or special economic zone level of government.

#### **4. Involvement with CISA**

- a) Is your business a member of CISA or regional Iron & Steel Associations? If so, explain your business' relationship with the association and the involvement of the GOC with the CISA.
- b) If your business is a member of the CISA, indicate whether this membership is voluntary or compulsory. Explain the functions that the CISA provides for your business. Explain in detail the role of the CISA with respect to the directives as provided by the GOC concerning the steel industry.

#### **5. Other industry associations**

- a) Is your business a member of any other industry associations? If so, explain your business' relationship with the association and the involvement of the GOC with the association.
- b) If your business is a member of another industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the GOC concerning the steel industry.

#### **6. Statistics submission/recording**

- a) Indicate if your business makes submissions<sup>3</sup> to the Chinese Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.
- b) Provide a recent example of a submission that has been made to the Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.
- c) Do the organisations approve or assess your submission? If yes, provide a detailed explanation.
- d) Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.

#### **7. Raw material supply**

---

<sup>3</sup> For example, monthly data relating to sales, production and costs.

**PUBLIC FILE      NON-CONFIDENTIAL VERSION**

- a) Is there a price difference in purchase price for raw materials (i.e. hot-rolled steel or other raw material) between your suppliers?
- b) Is there a price difference between purchase price of raw materials from SOEs and non-SOEs? Provide explanation.

*Note: the applicant alleges that producers in China of HSS have benefited from the provision of primary steel by the GOC at less than fair market value (see Program 20 in Section I of this questionnaire).*

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

**8. Regional differences**

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

**9. HSS production/output during the investigation period**

- a) Is any part of your production of HSS subject to any national/regional industrial policy or guidance? If so, provide details including a background of the policy/guidance and explain any restriction imposed by the policy/guidance.
- b) To what extent are any of the policies/guidelines identified in a) applicable to your business?
- c) Where applicable, how did your business respond to the policies/guidelines?
- d) Provide details regarding any other restrictions (e.g., geographic/regional, downstream, use, etc.) to the sale of HSS that may be imposed by the GOC.

**10. Sales price during the investigation period**

- a) Explain whether your business has been subjected to any direct or indirect price guidance or controls by the GOC during the investigation period, with respect to domestic steel prices.
- b) Explain whether your business has been subjected to any direct or indirect price guidance or controls by the GOC during the investigation period, with respect to raw material inputs (i.e. iron ore, coal, billet, hot-rolled steel, etc.).
- c) Explain whether your business has encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.

**11. Adding capacity and/or joint ventures**

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

**PUBLIC FILE****NON-CONFIDENTIAL VERSION**

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

**SECTION I – COUNTERVAILING**

*The applicant alleges that producers in China of HSS and upstream suppliers have benefited from a number of subsidies granted by the GOC (meaning any level of government – refer to the Glossary of Terms for further information), and that these subsidies are countervailable.*

**Answer:** *Shanghai MM is not a producer of the GUC or an upstream supplier, therefore this section is not applicable to Shanghai MM.*

*And Shanghai MM did not receive any subsidies under these programs.*

**INVESTIGATED PROGRAMS**

The following are programs that Customs and Border Protection is currently investigating:

**Program 1:** Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and Economic and Technological Development Zones

**Program 2:** One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'

**Program 3:** Provincial Scientific Development Plan Fund

**Program 4:** Export Brand Development Fund

**Program 5:** Matching Funds for International Market Development for Small and Medium Enterprises

**Program 6:** Superstar Enterprise Grant

**Program 7:** Research & Development (R&D) Assistance Grant

**Program 8:** Patent Award of Guangdong Province

**Program 9:** Training Program for Rural Surplus Labour Force Transfer Employment

**Program 10:** Preferential Tax Policies for Foreign Invested Enterprises– Reduced Tax Rate for Productive Foreign Invested Enterprises scheduled to operate for a period of not less than 10 years

**Program 11:** Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)

**Program 12:** Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai

**Program 13:** Preferential Tax Policies in the Western Regions

**Program 14:** Tariff and VAT Exemptions on Imported Materials and Equipments

**Program 15:** Innovative Experimental Enterprise Grant

**Program 16:** Special Support Fund for Non State-Owned Enterprises

## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

**Program 17:** Venture Investment Fund of Hi-Tech Industry

**Program 18:** Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment.

**Program 19:** Grant for key enterprises in equipment manufacturing industry of Zhongshan

**Program 20:** Hot rolled steel provided by government at less than fair market value

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

**PART I-1      PREFERENTIAL INCOME TAX PROGRAMS (PROGRAMS 1, 10, 11, 12 AND 13)**

1. Did your business or any company/entity related to your business receive any benefit<sup>4</sup> under the following five programs during the investigation period (1 July 2010 to 30 June 2011):

**Program 1:** Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and in Economic and Technological Development Zones

**Program 10:** Preferential Tax Policies for Foreign Invested Enterprises - Reduced Tax Rate for Productive Foreign Invested Enterprises scheduled to operate for a period not less than 10 years

**Program 11:** Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)

**Program 12:** Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai

**Program 13:** Preferential Tax Policies in the Western Regions

2. It is our understanding that the general tax rate for enterprises in China from 1 July 2010 was 25%. Confirm whether this is correct and if not, please identify the general tax rate for enterprises in China from 1 July 2010.
3. If your business currently pays corporate income tax at a rate less than 25% (or whatever the rate of general tax is as discussed above) , or paid at a rate less than that during the investigation period, please indicate whether the reduced rate relates to any of the preferential income tax programs identified above.
4. If the income tax rate of less than the general rate does not relate to any of the programs identified above, please provide an explanation for the reduced income tax rate and answer the questions in Part I-1 above in relation to the income tax rate reduction.

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

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

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 GOC in relation to the program.
9. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
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.
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.
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.
14. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
15. To your knowledge, does the program still operate or has it been terminated?
16. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-1 in relation to this programme.
17. For each taxation year, complete the table below.

Prepare this information in the attached spreadsheet named "**Income Tax**" included as part of the *HSS Exporter Questionnaire – CHINA – accompanying spreadsheet* provided alongside this questionnaire.
18. Provide a copy, bearing the official stamp of the appropriate level of the GOC of all
  - corporate income tax acknowledgement form(s) and the income tax return(s) that your company filed for the 2008, 2009 and 2010 tax years; and
  - income tax instalment payment receipts, and all applicable income tax forms and schedules for the 2008, 2009 and 2010 tax years.

**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**



## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

*were exempt from filing such a return and the applicable section[s] of the Income Tax Act under which you were exempt from doing so.*

**PART I-2 GRANTS (PROGRAMS 2-9 AND 15-19)**

It is Customs and Border Protection's understanding that the GOC may be providing grants to enterprises in China including the following identified programs:

**Program 2:** One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'

**Program 3:** Provincial Scientific Development Plan Fund

**Program 4:** Export Brand Development Fund

**Program 5:** Matching Funds for International Market Development for Small and Medium Enterprises

**Program 6:** Superstar Enterprise Grant

**Program 7:** Research & Development (R&D) Assistance Grant

**Program 8:** Patent Award of Guangdong Province

**Program 9:** Training Program for Rural Surplus Labour Force Transfer Employment

**Program 15:** Innovative Experimental Enterprise Grant

**Program 16:** Special Support Fund for Non State-Owned Enterprises

**Program 17:** Venture Investment Fund of Hi-Tech Industry

**Program 18:** Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment.

**Program 19:** Grant for key enterprises in equipment manufacturing industry of Zhongshan

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 2011**.
2. Did your business receive benefits under any other grant (including awards, prizes, funds) program during the period 1 July 2011 to 30 June 2011?

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

3. Provide complete details involving the amount of the grant received, including whether the grant was received in a lump sum or multiple instalments.
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).
5. Describe the application and approval procedures for obtaining a benefit under the program.
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 GOC in relation to the program.

7. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
8. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
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.
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.
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.
12. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
13. To your knowledge, does the program still operate or has it been terminated?
14. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?
 

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-1 in relation to this programme.
15. Identify the body responsible for administering the grant.
16. Identify the date of approval of the grant and the date the grant was received.
17. Indicate where the grant was accounted for on your business' financial statements.

**PART I-3      TARIFF AND VAT EXEMPTIONS ON IMPORTED MATERIALS AND EQUIPMENTS (PROGRAM 14)**

It is our understanding that certain enterprises in China are eligible for exemption from the payment of import duty and import VAT on imported inputs, technologies and machinery.

If your business or any company/entity related to your business received benefits under any such program during the period **1 July 2001 to 30 June 2011**, please answer the following questions.

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

## PUBLIC FILE

## NON-CONFIDENTIAL VERSION

2. Describe the application and approval procedures for obtaining a benefit under the program.
3. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
4. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
5. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
6. State whether your eligibility for the program was conditional on one or more of the following criteria:
  - a) whether or not your business exports or has increased its exports;
  - b) the use of domestic rather than imported inputs;
  - c) the industry to which your business belongs; or
  - d) the region in which your business is located.
7. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
8. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
9. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
10. To your knowledge, does the program still operate or has it been terminated?
11. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?
 

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-1 in relation to this programme.
12. Were the materials and/or equipment that were entitled to a refund of VAT used in the production of the goods during the investigation period? If yes, provide the following information:
  - (a) type of inputs;
  - (b) cost of inputs;
  - (c) quantity of inputs; and
  - (d) amount of VAT refunded.
13. Has your company received exemption from payment of or refunds of import duty and import VAT for imported material inputs (e.g. HRC, HRS, narrow strip, etc.) at any time that were used in the production of the goods during the investigation period? If yes, provide the following information:

- (a) description of imported product;
- (b) country of origin;
- (c) quantity of imported product;
- (d) purchase price;
- (e) terms of purchase (f.o.b., c.i.f., etc);
- (f) ocean freight;
- (g) value for duty of imported product;
- (h) regular rate of taxes and duties;
- (i) concessionary rate of taxes and 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.

14. Explain if (and how) the GOC determines which imported inputs are consumed by your business in the production of the subject goods and in what amounts, and the amount of duty paid or payable on the inputs (including any allowance for waste).

Please explain how the GOC determined the percentage rate of duty exemption.

Please note that goods consumed in the production of exported goods (inputs) include:

- (a) goods incorporated into the exported goods; and
- (b) energy, fuel, oil and catalysts that are used or consumed in the production of the exported goods.

15. Provide a representative sample of 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.
16. In addition to the import entry documents, you must also provide copies, if applicable, of any applications submitted to and/or approval document received from the GOC relating to the exemption from the payment of import duty and import VAT on imported inputs and in relation to the VAT that is refunded on the exportation of the subject goods.
17. Provide copies of reports and audits by the GOC 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.

#### **PART I-4 HOT ROLLED STEEL PROVIDED BY GOVERNMENT AT LESS THAN FAIR MARKET VALUE (PROGRAM 20)**

The applicant claims that public bodies (in the form of state-owned enterprises (SOEs)) are supplying hot rolled steel, directly or indirectly, to manufacturers of HSS at less than fair value.

In this questionnaire, the term 'hot rolled steel' (HRS) refers to both hot rolled coil (HRC) and narrow strip.

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

In relation to this program, provide the following information.

1. Did your business or any company/entity related to your business receive any benefit under the above program during the period **1 July 2011 to 30 June 2011**.
2. Does your business purchase any goods/services from SOEs, e.g., raw materials (including HRS), energy, water, other utilities, etc?
3. Provide a list, including a contact name and address, of all your suppliers of HRS. Indicate whether the supplier is a SOE.
4. Provide a listing showing the purchase price of HRS from each supplier during each month of the investigation period.

Prepare this information in the attached spreadsheet named **"HRS Purchases"** included as part of the *HSS Exporter Questionnaire – CHINA – accompanying spreadsheet* provided alongside this questionnaire.

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

5. Did your business receive any reduction/reduced price for the purchase of these goods/services during the investigation period? If so, describe the eligibility criteria that your business had to meet in order to qualify for any reduction in the price paid for the goods/services.
6. Provide copies of all contractual agreements that detail the obligations of the SOE and your business with reference to the granting and receipt of the assistance/benefits.
7. Did your business import any raw material during the investigation period? If yes, please provide details of all such imports, including date, source, type, amount and price.
8. Explain the reason/s for your business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc.

#### **PART I-5 ANY OTHER PROGRAMS**

If the GOC, any of its agencies or any other authorised body has provided any other benefit<sup>5</sup> under any other assistance programs to your entity not previously addressed, identify the program(s).

This may have included:

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

<sup>5</sup> Refer to the Glossary of Terms for a definition of benefit in this context.

- any other form of assistance.

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

1. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production, or only certain products that have undergone research and development).
2. Describe the application and approval procedures for obtaining a benefit under the program.
3. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
4. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
5. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
6. State whether your eligibility for the program was conditional on one or more of the following criteria:
  - a) whether or not your business exports or has increased its exports;
  - b) the use of domestic rather than imported inputs;
  - c) the industry to which your business belongs; or
  - d) the region in which your business is located.
7. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
8. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
9. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
10. To your knowledge, does the program still operate or has it been terminated?
11. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

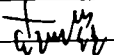
If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-1 in relation to this programme.

PUBLIC FILE

NON-CONFIDENTIAL VERSION

上海市五金矿产进出口公司金属材料制品分公司Shanghai Minmetals Materials & Products Corp.**Declaration**

I hereby declare that Shanghai Minmetals Materials & Products Corp. 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 : Cui MingyaoSignature : Position In  
Company : Deputy ManagerDate : October 30, 2011

**SECTION K - CHECKLIST**

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

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

Section	Please tick if you have provided spreadsheet
<b>INCOME STATEMENT</b>	✓
<b>TURNOVER</b> – sales summary	✓
<b>AUSTRALIAN SALES</b> – list of sales to Australia	✓
<b>DOMESTIC SALES</b> – list of all domestic sales of like goods	✓
<b>THIRD COUNTRY</b> – third country sales	✓
<b>PRODUCTION</b> – production figures	✓
<b>DOMESTIC COSTS</b> – costs of goods sold domestically	✓
<b>AUSTRALIAN COSTS</b> – costs of goods sold to Australia	✓
<b>HRS PURCHASES</b> – purchase cost of HRS during the investigation period	✓
<b>INCOME TAX</b> – details of income tax paid for the last 3 financial years	✓



PUBLIC FILE

NON-CONFIDENTIAL VERSION

上海市五金矿产进出口公司金属材料制品分公司Shanghai Minmetals Materials & Products Corp.

October 18, 2011

The Director  
International Trade Remedies Branch, Operations 3  
Australian Customs and Border Protection Service  
Customs House  
5 Constitution Avenue  
Canberra ACT 2601

Dear Sir / Madam,

**Re: Australian Customs Dumping Notice 2011/43  
Certain Hollow Structural Sections from the Peoples Republic of  
China**

Please be advised that Shanghai Minmetals Materials & Products Corp. will be providing to our advisor, Beijing B&H Associates, confidential information required to complete the Australian Customs and Border Protection Service's Exporter Questionnaires in relation to the above referenced dumping and subsidization investigation.

Mr. Lan Xiong, Mr. Wang Peng, Mr. Ding Peng and other advisors of Beijing B&H Associates are duly authorized to represent us in these matters, and to complete and lodge the questionnaires, and any other supporting correspondence and participate in above-mentioned proceeding on behalf of our company. The contact is as follows:

Mr. Lan Xiong  
Telephone: +8610-8223-0597  
Facsimile: +8610-8223-0598  
Email: lx@bohenglaw.com

We will be happy to cooperate and provide any relevant information requested by Customs and Border Protection. And we will also be happy to receive a visit by Customs and Border Protection, should that be considered necessary, to allow verification of the information provided by us during these investigations. Please give us sufficient notice if you intend to visit so we can ensure that the relevant staffs are available to meet with you.

Yours faithfully,



Cui Mingyao  
Deputy Manager

Shanghai Minmetals Materials &amp; Products Corp.

NON-CONFIDENTIAL VERSION

57

**LIST OF EXHIBITS  
Shanghai MM**

Exhibit A-1	Corporate Structure Diagram (CONFIDENTIAL)
Exhibit A-2	Internal Organization Chart (CONFIDENTIAL)
Exhibit A-3	List of Senior Managements (CONFIDENTIAL)
Exhibit A-4	Company Brochure (PUBLIC)
Exhibit A-5	Chart of Accounts (CONFIDENTIAL)
Exhibit A-6	2009 and 2010 Audited Reports (CONFIDENTIAL)
Exhibit A-7	Quarterly Financial Reports during the Investigation Period (CONFIDENTIAL)
Exhibit A-8	Significant Accounting Policy Summary (CONFIDENTIAL)
Exhibit A-9	Income Statement Spreadsheet (CONFIDENTIAL)
Exhibit A-10	Turnover Spreadsheet (CONFIDENTIAL)
Exhibit B-1	List of Australian Customers (CONFIDENTIAL)
Exhibit B-2	Australian Sales Spreadsheet (CONFIDENTIAL)
Exhibit B-3	Sample Australian Sales Documentation Package (CONFIDENTIAL)
Exhibit F-1	Third Country Spreadsheet (CONFIDENTIAL)
Exhibit G-1	Australian CTMS Spreadsheet (CONFIDENTIAL)

PUBLIC FILE NON-CONFIDENTIAL VERSION

## **Exhibit A-4**

### **Company Brochure**

# 上海五金矿产 SHANGHAI MINMETALS



# 目 录



总经理致辞	1
From the General Manager	
驻外机构	1
Overseas Subsidiaries & Branches	
标准件分公司	6
Fasteners Branch	
第四出口业务部	8
The 4th Export Department	
金属材料制品分公司	10
Materials & Products Co.	
有色金属分公司	14
Non-ferrous Metals Co.	
建筑五金分公司	16
Building Hardware Co.	
上海金达进出口公司	20
Jin Da Import & Export Co.	
第十一出口业务部	22
The 11th Export Department	
上海开鑫进出口公司	25
Kai Xin Import & Export Co.	
上海五矿浦东公司	26
Shanghai Minmetals Pudong Co.	
进口业务部	26
The Import Department	
上海五矿金沪国际货运有限公司	30
Shanghai Minmetals Golden Hope	
International Transportation Co., Ltd.	
期货业务部	41
Futures Department	
船舶业务部	42
Vessel Department	

## CONTENT



## 总经理致词

.....  
**From the General Manager**



上海市五金矿产进出口公司成立于1949年，是一家具有近50年经营历史的国有专业进出口公司。公司的传统经营商品包括钢铁、有色金属及制品、矿产品和各类五金制品。经过数十年的开拓和发展，公司的经营网络遍布全球140多个国家地区的3000多家客商。

公司在美国、日本、欧洲、中东和东南亚等地还设立了8个海外直属机构。在国内，上海五矿是一家实力雄厚的老牌外贸企业。其商品采购渠道遍布中国沿海各大省市，近年来又向内地逐步渗透。

多年来，上海五矿的经营业绩稳定增长，进出口总额始终保持在3亿美元以上，在中国最大的500家进出口企业排行榜上名列前茅。其中在建筑小五金、紧固件和其他一些金属制品上，公司具有完善的经营网络和丰富的营销经验，以此为基础创立的公司著名品牌“钻石”、“铁锚”等注册商标在国内外市场上享有很高的声誉。公司出口钨石等矿产品的历史悠久，是中国最大钨石出口商之一。近年来公司还发展了建筑材料、轻工产品、汽车配件等其他产品的出口，经营的范围日益扩展。上海五矿是中国最著名的钢铁进口企业之一，为许多国内知名的大企业从事原材料进口代理。

上海五矿依托其强大的进出口实力，在仓储、运输等领域取得良好的发展成绩，并成功开拓了国际货运代理业务。

我们将运用多功能、全方位的服务体系，不断致力于建立和发展与国内外新老朋友的合作关系。

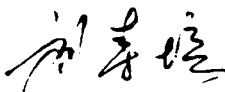
## Welcome to Shanghai Metals & Minerals Import & Export Corporation (SMMIEC).

SMMIEC is one of the largest enterprises operating import and export of metals and minerals in China. Our main lines include iron and steel, metal products & hardware, Ferro-alloy and minerals etc. In the 1990s, SMMIEC has maintained an average annual business turnover of US\$300 million, ranking among the 100 largest foreign trade enterprises in China. Today, our sales network reaches more than 3000 clients in about 140 countries and regions throughout the world. We have subsidiary offices in major markets like USA, Europe, Japan, the Middle East and South East Asia. Meanwhile, more than 600 local manufacturers spreading over 25 provinces in China have contributed to form a well-organized supply channel.

A high percentage of our export is based on metal products including iron and steel, building hardware, fasteners, iron wire nails and wires, steel wire ropes, castings and forgings, etc. Metal products exported with our highly reputed "Diamond" brand and "Anchor" brand represent high quality and best service in foreign markets. We have also advantage in export of certain nonmetallic minerals such as fluorspar, Ferro-alloy, rare metal and precious metal etc. Iron and steel import and scrap vessel demolition form a large part of our business volume.

Efficiency, Effectiveness and Economization are our business principles. We are ready to offer our clients:

- Products of fine quality, favorable price and satisfactory post-sale service.
- Convenience to buy container loads of mixed products.
- Speedy delivery and standardized transportation service.
- Diversified trade terms such as Agency, International bidding, Counter trade, OEM, Assembling or Processing on supplied materials or designs.



Liu Shou Pei



PUBLIC FILE

NON-CONFIDENTIAL VERSION



驻外机构

Overseas Subsidiaries and Branches

**荷兰东方国际有限公司**  
SHANGHAI ORIENT  
INTERNATIONAL B.V.

地址: WESTBLAAK 133 ZEN R. 3012  
K.J. ROTTERDAM, NETHERLAND  
电话: 0031-10-4049055  
传真: 0031-10-4149562

**法国金发有限公司**  
MINMETALS(S) FRANCE  
EQUIPMENT SARL

地址: 8 ALLEE DU DOCTEUR  
RIBEYRE 93800 AULNAY SOUS  
BOIS, FRANCE  
电话: 0033-1-43851356  
传真: 0033-1-43851395

**英国东方国际贸易有限  
公司**

ORIENTAL INTERNA-  
TIONAL (UK) LTD.

地址: 61 CHESTNUT AVENUE  
BUCKHURST HILL ESSEX IG8 6EP  
ENGLAND  
电话: 0044-181-5045847  
传真: 0044-181-5592988

**泰国泰沪国际贸易有限  
公司**

SIAM SHANGHAI  
INTERTRADE CO.LTD.

地址: 4053 RAMA 4 ROAD  
PRAKANONG BANGKOK 10110  
THAILAND  
电话: 00662-3901866-245  
传真: 00662-7135134



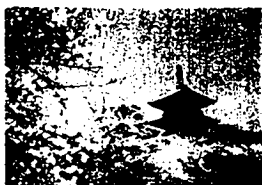
NON-CONFIDENTIAL VERSION

64



PUBLIC FILE

NON-CONFIDENTIAL VERSION



阿联酋申阿国际迪拜公  
司五金矿产部  
GRAND SHANGHAI  
GENERAL TRADING CO  
METALS & MINERALS  
DEPARTMENT

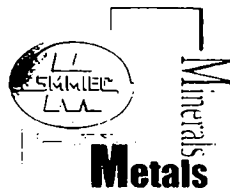
地址 DANATA P.O. BOX 22837  
SHAWARIN TRADING EST. DEIRA -  
DUBAI - U.A.E  
电话 00971 - 4 - 2773685  
传真 00971 - 4 - 2779276

上海海联株式会社五金  
矿产部  
SHANGHAI UNITED  
TRADING CO. OSAKA  
METALS & MINERALS  
DEPARTMENT

地址 6-1, F.NO.93-CHOME  
UTSUBO HONMACHI NISHI-KU  
OSAKA JAPAN  
电话 0081-6-54458471  
传真 0081-6-54458474

马来西亚申联金属工业  
(马)有限公司  
SHANGHAI METAL  
INDUSTRIES(M) SDN  
BHD

地址 NO.2-4-12 JALAN 5 100A  
TAMAN GEMILANG JALAN  
CHERAS 56100 KUALA LUMPUR  
MALAYSIA  
电话 00603-9329272  
传真 00603-9333035



NON-CONFIDENTIAL VERSION

65



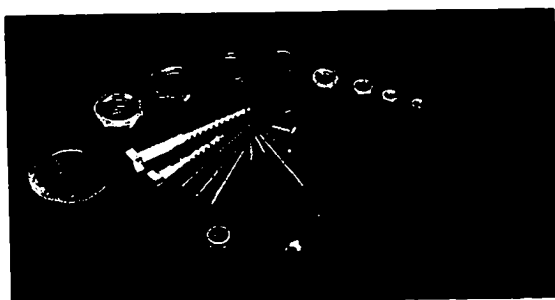
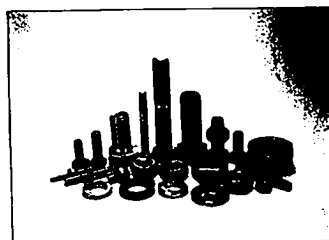
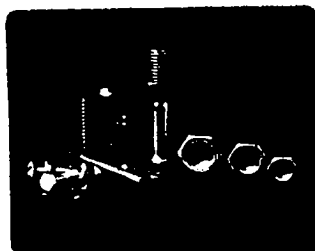
标准件分公司

Fasteners Branch



**标准件  
Fasteners**

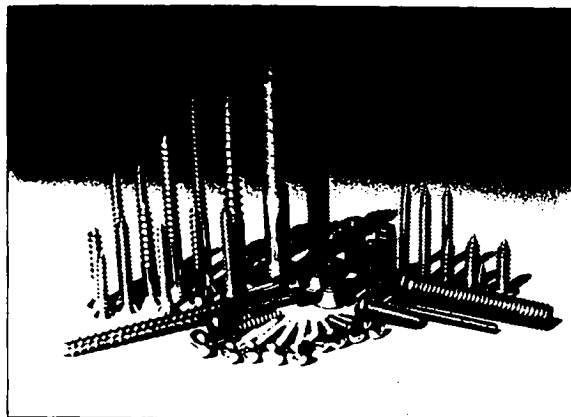
- 木螺钉  
Steel Woodscrews
- 机螺钉  
Steel Machine Screws
- 自攻螺钉  
Self Tapping Screws
- 干壁螺钉  
Dry Wall Screws
- 纤维板螺钉  
Chipboard Screws
- 双线快牙螺钉  
Twin Fast Woodscrews
- 六角头木螺钉  
Steel Hex Head Woodscrews
- 自钻螺钉  
Self Drilling Screws
- 铜木螺钉  
Brass Woodscrews
- 铜机螺钉  
Brass Machine Screws



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: 0086-21-63536006 Fax: 0086-21-63536917 63536909  
E-mail: cnfast@public7.dia.net.cn jiafast@online.sh.cn

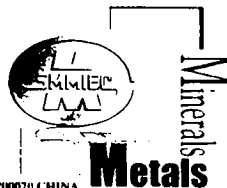
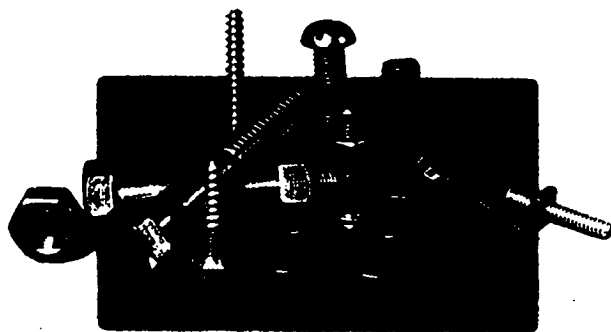
PUBLIC FILE

NON-CONFIDENTIAL VERSION



### 标准件 Fasteners

全螺栓杆  
Threaded Bars  
 护轨栓  
Guard Rail Bolts  
 羽子板  
Bracing Bolts  
 蝶型帽  
Wing Nuts  
 盖型帽  
Cap Nuts  
 U型栓  
U Bolts  
 吊板栓  
Drawer Bolts  
 方头螺栓  
Square Head Bolts & Nuts  
 六角螺栓帽  
Steel Hexagonal Nuts  
 四方螺栓帽  
Steel Square Nuts  
 六角螺栓帽  
Steel Hexagonal Bolts & Nuts  
 瓦楞螺栓帽  
Roofing Bolts(Nuts)  
 马车帽  
Steel Carnage Bolts & Nuts  
 弹簧垫圈  
Spring Washers  
 平垫圈  
Flat Washers  
 铜螺母  
Brass Hexagonal Nuts  
 地脚栓  
Anchor Bolts



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
 Tel: (86) 21-63536006 Fax: (86) 21-63536017/63536018  
 E-mail: smf@public7.sda.net.cn jzsh@online.sh.cn

NON-CONFIDENTIAL VERSION

PUBLIC FILE

NON-CONFIDENTIAL VERSION



第四出口业务部

The 4th Export Department

矿产及制品  
Mineral

萤石块  
Fluorspar Lump  
 萤石粉  
Fluorspar Powder  
 萤土  
Baunite  
 硅灰石  
Wollastonite  
 天然石墨  
Natural Graphite  
 人造石墨  
Synthetic Graphite  
 石墨电极  
Graphite Electrode  
 碳化硅  
Silicon Carbide  
 重晶石  
Baryte  
 磷渣  
Phosphorus slag  
 蛭石  
Vermiculite Ore  
 人造金刚石  
Synthetic Diamond  
 焦炭  
Coke  
 活性炭  
Activated Carbon



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA

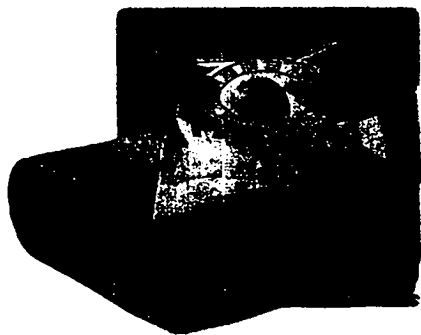
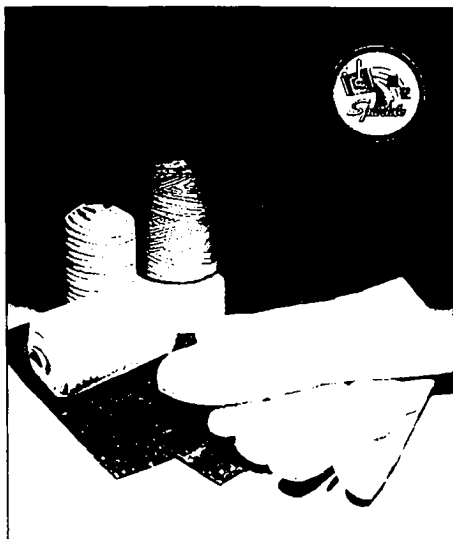
Tel: (86) 21-63518585 • (201-1225) 0086-21-63131226 63815601 Fax: (86) 21-63131000 63131063  
 E-mail: chinex4@public.sta.net.cn

NON-CONFIDENTIAL VERSION

68

PUBLIC FILE

NON-CONFIDENTIAL VERSION



水泥  
Cement  
白水泥  
White Cement  
油毛毡  
Asphalt Roofing Felt  
大理石  
Marble Products  
花岗石  
Granites Products  
黄沙及红沙  
Sand & Red Sands  
玻璃及制品  
Glass & Products  
珍珠岩及制品  
Pearlite & Products

绝缘隔热及密封材料  
Insulating, Refractory &  
Sealing Materials

电绝缘纸板  
Dielectric Paperboard

云母制品  
Mica Products

电阻丝  
Resistance Wire

石棉制品  
Asbestos Products

耐火砖  
Refractory Bricks

橡胶制品  
Rubber Sheet & Tube

密封垫片  
Gasket Sheet

玻璃纤维制品  
Glass Fibre Products



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA

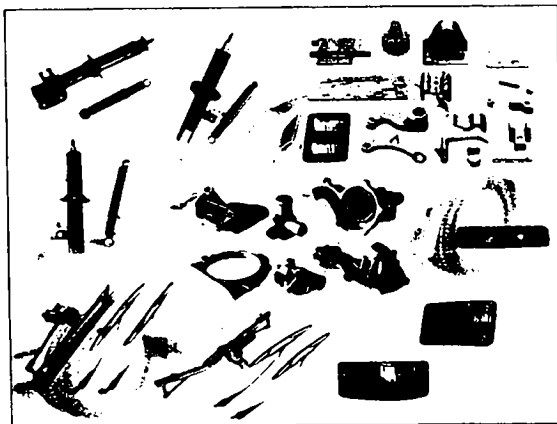
Tel: (0086-21-63533885 • 1201-1225 (0086-21-63170326 63815601 Fax: (0086-21-63170303 63170363  
E-mail: skinner4@public4.sia.net.cn

NON-CONFIDENTIAL VERSION



金南材料制品有限公司

SHANGHAI JINAN STEEL CO., LTD.



槽钢

Channel Bar

角钢

Angle Bar

扁钢

Flat Bar

方钢

Square Bar

圆钢

Round Bar

焊管料

Welding Section

热轧中板

Hot Rolled Plates

热轧卷板

Hot Rolled Coils

低合金钢材

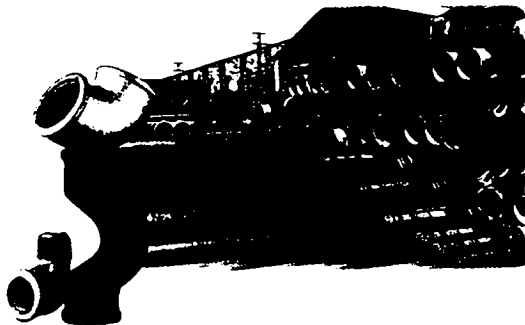
Low Alloy Steel Bars

镀锌焊管

Galv. Welded Steel Pipe

不锈钢无缝管

Stainless Seamless Steel Pipe



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA

Tel: 0086-21-63538585 \* (Ext) Fax: 0086-21-63171873 63533536

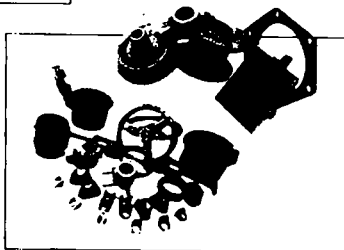
E-mail: jnmc@online.sh.cn

PUBLIC FILE

NON-CONFIDENTIAL VERSION



带 板 丝  
Strip Sheet Round Wire  
棒 管 箔  
Rod Tube Foil



板 卷片 丝  
Sheet Sheet in Coil Round Wire  
箔 螺钉 其它产品  
Foil Rivets Others



量水器  
Water Meter Box  
铸铁水泵配件  
Cast Iron Pump Parts  
球阀阀体  
Ball Valve  
水表壳及盖  
Water Meter Box & Cover  
锌管接  
Zinc Coupling  
法兰盘  
Flanges  
其它铸铁铸钢锻钢不锈钢产品  
Other Casting & Forging Products



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: 0286-21-63518585 • (Fax): 0286-21-63173673 • 63533536  
E-mail: skm@online.sh.cn

NON-CONFIDENTIAL VERSION

71

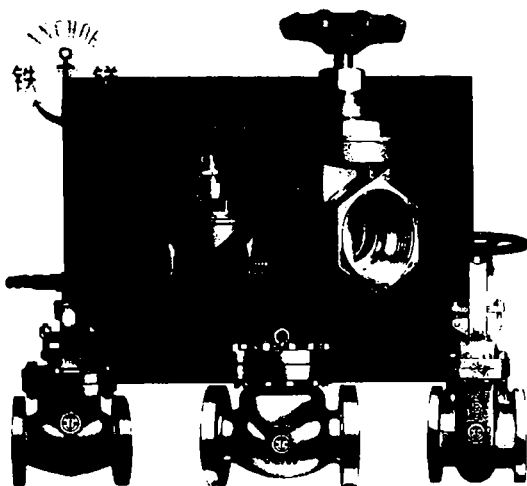
PUBLIC FILE

NON-CONFIDENTIAL VERSION



金属材料制品有限公司

SHANGHAI GUANGFU CO., LTD.



阀门  
Valves

龙头  
Screw Down Bib Cocks

地漏配件  
Brass Closet Floor Flanges

玛钢连接器  
Zinc-Plated Malleable Iron  
Compression Couplings

止漏带  
P.T.F.E Thread Seal Tape

脸盆水嘴系列  
Faucets

玛钢管件  
Pipe Fittings

钢管件  
Pipes

水表  
Water Meters

管接头  
No-Hub Coupling



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: (86)-21-61513585 (Ext.) Fax: 0086-21-61513516  
E-mail: smmc@guangfu.sh.cn

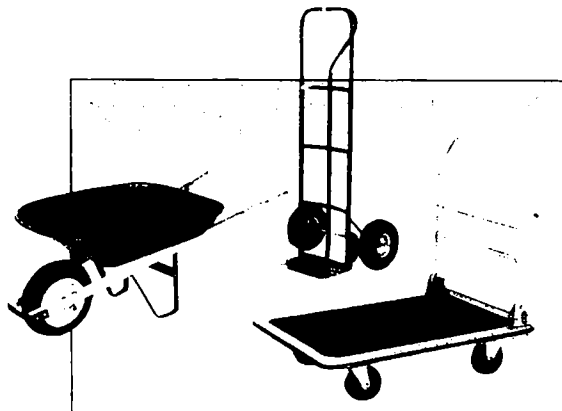
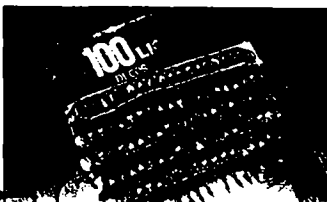
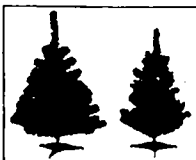
NON-CONFIDENTIAL VERSION

72



PUBLIC FILE

NON-CONFIDENTIAL VERSION



电工夹  
 Booster Cable  
 园林工具  
 Garden Tools  
 轴承  
 Bearing  
 手推车  
 Wheel Barrows  
 工作手套和工作服  
 Working Gloves & Overall  
 节日饰品  
 Holiday Decoration  
 电视机  
 Televisions  
 小刀  
 Pocket Knife



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
 Tel: (86)-21-65533535 • (Ext): Fax: (86)-21-65533536  
 E-mail: unox@online.sh.cn

NON-CONFIDENTIAL VERSION

73

PUBLIC FILE

NON-CONFIDENTIAL VERSION



有色金属分公司

on-ferrous Metals Co.

## 半导体材料

Semi Conductor Material

锗 镓 硒 碲 铋 碲  
Ge In Ga Se Ta Nb Te

单晶硅

Mono-Silicon

多晶硅

Poly-Silicon

## 贵金属

Precious Metal

铂 钯 铑 铱 钌 铑  
Rh Pd Ir Ru Re Os

## 稀土金属及其氧化物

Rare Earth And Oxides

钇 铈 镨 钕 铈  
Y Eu Sm La Ce Gd镨 钕 铈 铈  
Pr Dy Nd Er Ho

## 其他

Others

五氧化二钒

Vanadium Pentoxide

钨丝

Tungsten Wire

氧化锌

Zinc Oxide

锌粉

Zinc Powder

磁性材料

Magnetic Material

金属瓷片

Metal Ceramic Tile



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: 086-21-63171500 Fax: 086-21-63331206  
E-mail: unpdnmc@online.sh.cn

NON-CONFIDENTIAL VERSION

74

PUBLIC FILE

NON-CONFIDENTIAL VERSION



## 铁合金及其相关材料

Ferro Alloy and Related Alloy  
Intermediate

钨铁	钼铁	磷铁	铬铁
FeW	FeMo	FeP	FeCr
硅铁	锰铁	硼铁	钒铁
FeSi	FeMn	FeB	FeV
硅锰	硅铬	硅钼	金属硅
SiMn	SiCr	SiMo	Si Metal

## 人造石墨粉

Artificial Graphite Powder

## 活性炭

Activated Carbon

## 炼钢增碳剂

Carbon Additive

## 基本金属

Base Metal

铜	铝	锌	镍
Cu	Al	Pb	Zn Ni Sn

## 贱金属及稀散金属

Minor Metal

钴	钨	铋	铊
Co	W	Sb	Cr Mn Mo
钼	铌	钽	铈
V	Bi	Cd	Mg As Ti
钽	铈	铈	铈
Si	Li	Ca	Sr Zr



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: (86)-21-61173591 Fax: (86)-21-61533326  
E-mail: ampdefew@vesting-sh.cn

NON-CONFIDENTIAL VERSION

75

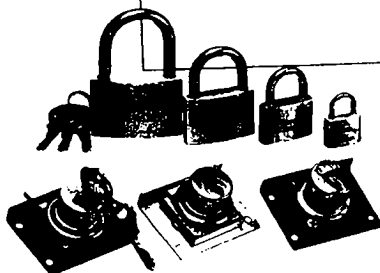
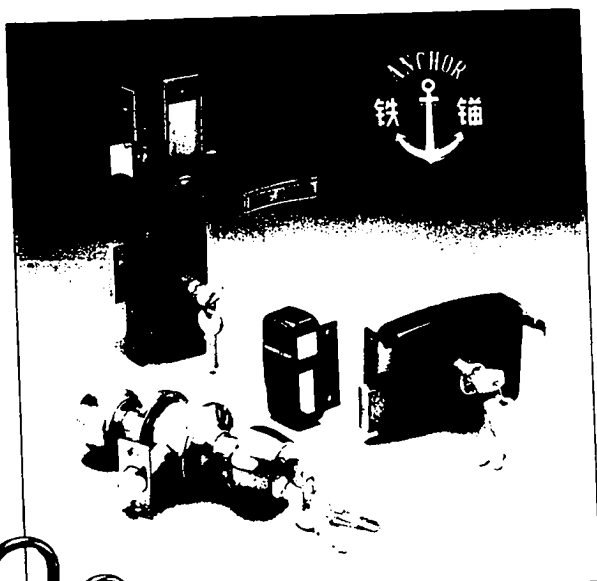


第五五金分公司  
**Building Hardware Co.**

### 锁具 Locks

弹子门锁  
Rim Night Latches  
 双舌弹子门锁  
Deadbolt Latches  
 插芯门锁  
Mortise Lockset  
 球型门锁  
Cylindrical Locks  
 门锁把手  
Door Handles  
 锁头  
Cylinders  
 挂锁  
Padlocks  
 抽屉锁  
Drawer Locks  
 其它用途锁  
Special Locks  
 锁配件  
Lock Fittings

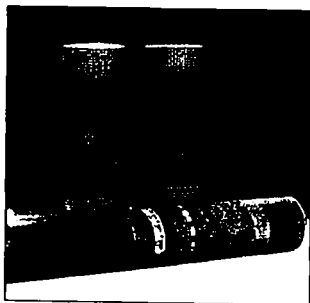
16



ADD: 757 GUANGFU ROAD, SHANGHAI 200078 CHINA  
 Tel: (86) 21-63338585 (Ext) Fax: 0086-21-63334802 63334803  
 E-mail: smhhd@shhac.ch.cn

PUBLIC FILE

NON-CONFIDENTIAL VERSION



## 网类

Wire Netting

六角铁丝网

Hexagonal Iron Wire Netting

电焊网

Welded Wire Mesh

铁丝网

Steel Wire Cloth

窗纱

Iron Wire Netting

方眼网

Square Wire Mesh

黄铜丝网

Brass Wire Cloth

磷铜丝网

Phosphor-Copper Wire Cloth

不锈钢丝网

Stainless Steel Wire Cloth

尼龙网

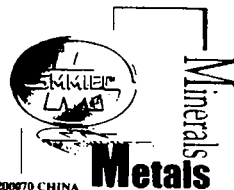
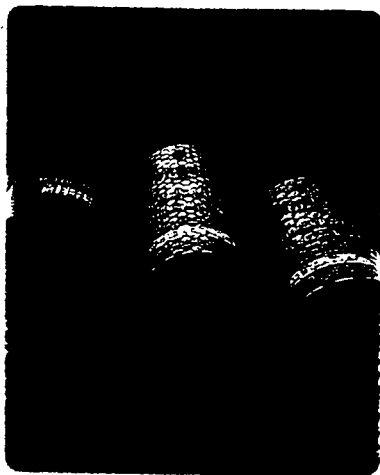
Nylon Bolting

涤纶网

Polyester Bolting

印花筛网

Rotary Nickel Screen for Printing



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA

Tel: (0086-21-63538585) (EAT) Fax: (0086-21-63534202) 63534203

E-mail: smh@cdonline.sh.cn

NON-CONFIDENTIAL VERSION

77



五金五金分公司  
**Binding Hardware Co.**

16

### 铰链 Hinges

厚铰  
Heavy Hinges

薄铰  
Light Hinges

T 铰  
T Hinges

H 铰  
H Hinges

全铜铰链  
Solid Brass Hinges

不锈钢铰链  
Stainless Steel Hinges

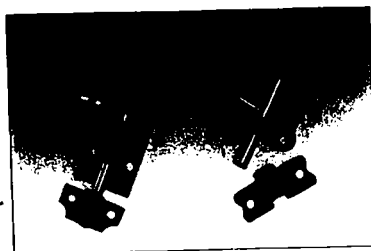
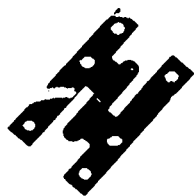
镀铜铰链  
Brass Plated Square Hinges

弹簧铰链  
Spring Hinges

家具铰链  
Furniture Hinges

自关铰  
Self-Closing Spring Hinges

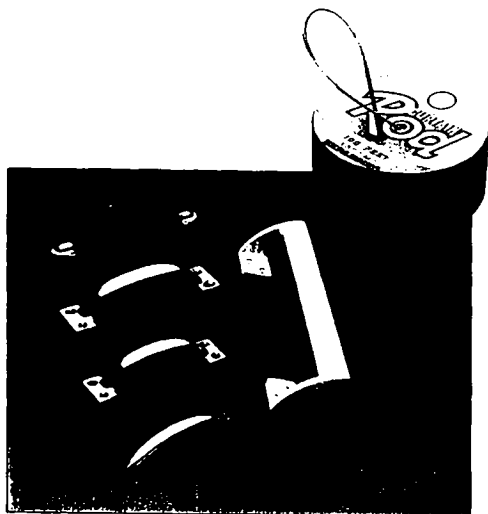
特种铰链  
Special Types of Hinges



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
 Tel: (86-21) 63338585 • (Ext.) Fax: 0086-21-63338802/63338803  
 E-mail: snbbed@online.sh.cn

PUBLIC FILE

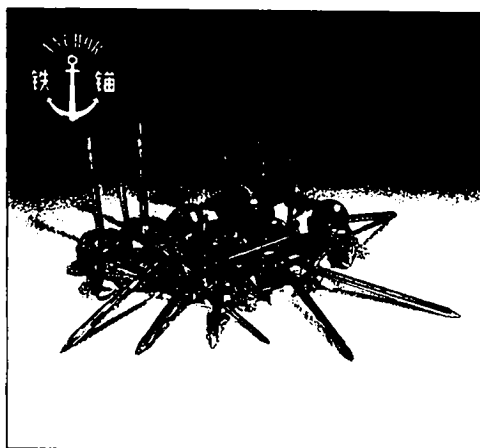
NON-CONFIDENTIAL VERSION



瓦楞钉  
Roofing Nails

小五金  
Hardware

插销  
Tower Bolts  
铁牌  
Hasps and Staples  
镀锌窗钩  
Galvanized Hooks and Eyes  
灯钩  
Screw Hooks  
羊眼  
Screw Eyes  
窗帘弹簧线  
Curtain Rods  
门拉手  
Door Pulls



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: (086-21) 63533585 • (E-c) Fax: (086-21) 63533402 63533403  
E-mail: smh@chinaonline.sh.cn

NON-CONFIDENTIAL VERSION

79



上海金达进出口公司

Shanghai Jin Da Import & Export Co.

**搪瓷制品**

Enamel Ware

煲锅

Casserole

脸盆

Basin

杯

Mug

碗

Bowl

盆

Plate

盘

Tray

壶

Pot/Kettle



**搪瓷熔块和色素**

Enamel Frits & Pigment

**铝制品**

Aluminium Ware

**不锈钢制品**

Stainless Steel Products

**玻璃制品**

Glass Ware

**陶瓷**

Ceramics

**塑料/密胺制品**

Plastic/Melamine Products



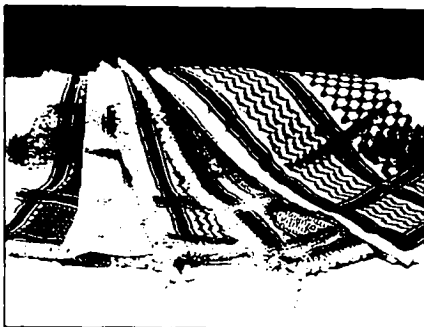
ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: (86)-21-63573528 63573529(Ext.) Fax: (86)-21-63573467

E-mail: jinda@online.sh.cn



PUBLIC FILE

NON-CONFIDENTIAL VERSION



灯

Lamp

飓风灯

Hurricane Lantern

汽灯

Pressure Lantern

煤油灯

Kerosene Lamp

灯罩

Glass Globe

纱罩

Mantles

灯泡

Bulbs

纺织品

Textile Products

头巾

White Ghutra / Yashmagh

阿拉伯大袍

Arabian Robe

长裤和短裤

T/C Shorts &amp; Underpants

毛毯

Blankets

手套

Gloves

围巾

Muffler



运动帽·草帽及草包

Sports Caps, Straw Hats  
and Bags

自行车内外胎和零件

Bicycle Tyres, Tubes &  
Spare Parts

ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: (086-21)-63533528/63530585(Ext.) Fax: (086-21)-63534607  
E-mail: jinda@online.sh.cn

NON-CONFIDENTIAL VERSION

81

PUBLIC FILE

NON-CONFIDENTIAL VERSION



第十一出口业务部

The 11th Export Department

### 钢丝和钢丝绳 Steel Wires & Ropes

光面镀锌和镀锌钢  
Ungalvanized & Galvanized Steel Wire  
Ropes

镀锌和聚氯乙烯涂层钢丝绳  
Galvanized & PVC-coated Aircraft  
Cables

不锈钢钢丝和钢丝绳  
Stainless Steel Wire & Ropes  
汽车、摩托车控制线  
Control Cables of Automobile & Motor

镀锌钢绞线  
Galvanized Steel Strands

PC 钢丝和钢绞线  
PC Wires & Strands

弹簧钢丝  
Steel Spring Wires  
特殊用途钢丝  
Special Steel Wires

### 各类编织绳 PE/PP/KP/Vinylon/Nylon Ropes

### 铁链条 Link Chains

英制短、半长环和长环链  
M.S. Ordinary Short, Semi-Long and  
Long Link Chains

不锈钢链  
Stainless Steel Link Chains

英制链  
M.S. Proof Coil Chains

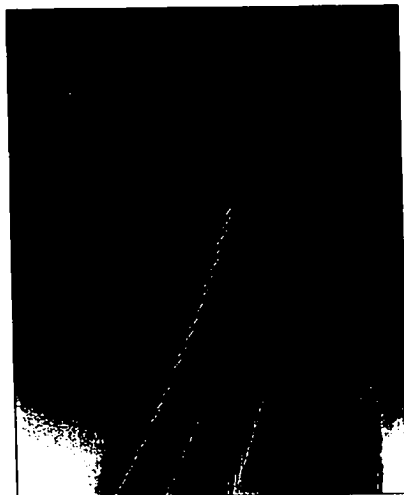
花制链  
M.S. Din Standard Link Chains

### 索具 Rigging Hardware

卸扣  
Shackles

花兰  
Turnbuckles

卡头、套环、弹簧钩等  
Clips, Thimbles & Snap Hooks...etc.



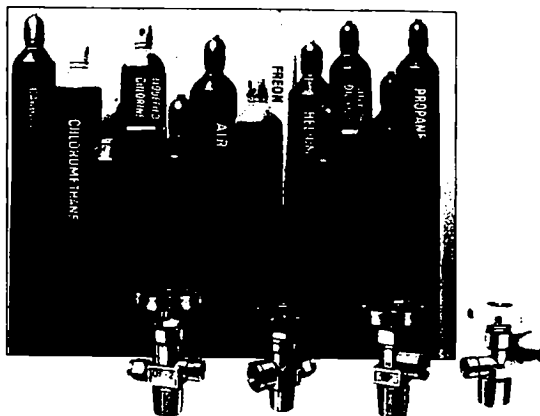
ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: 0086-21-43338365 \* 1804-1618 Fax: 0086-21-43334807  
E-mail: cnick@online.cn

NON-CONFIDENTIAL VERSION

82

PUBLIC FILE

NON-CONFIDENTIAL VERSION



### 钢瓶 Gas Cylinders

无缝气瓶  
Seamless Steel Gas Cylinder  
焊接气瓶  
Welded Steel Gas Cylinder  
医用气瓶  
Medical Gas Cylinder, etc.  
铝合金气瓶  
Aluminum Alloy Gas Cylinder  
溶解乙炔气瓶  
Dissolved Acetylene Gas Cylinder

### 气瓶阀门 Gas Cylinder Valve

### 焊接系列 Welding Consumables

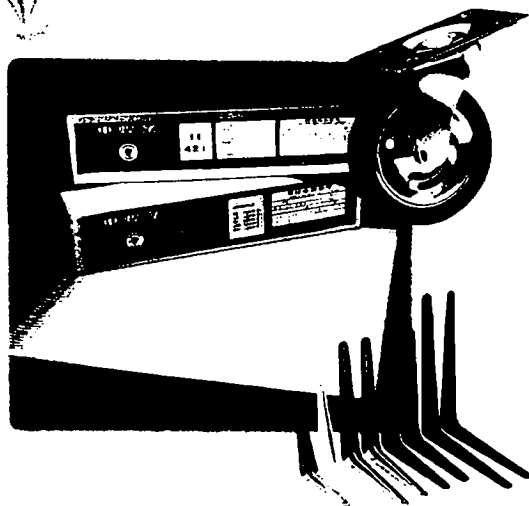
电焊条  
Welding Electrodes  
铜焊条  
Tin Brass Welding Rods  
气保焊丝  
CO2 Copper-coated Solid Welding Wire

### 脚轮 Casters

橡胶轮  
Rubber Wheel Casters  
塑料轮  
Plastic Twin Wheel Casters  
铸铁轮  
Cast Iron Casters

### 三角架 Shelf Brackets

### 折叠式角架 Folding Brackets

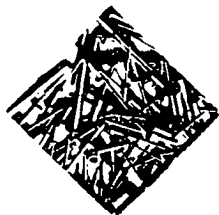


ADD: 757 GUANGFEI ROAD, SHANGHAI 200070 CHINA  
Tel: (86) 21 65516565 • (86) 21 65516567 Fax: (86) 21 65516567  
E-mail: shanghai@minerals.com

NON-CONFIDENTIAL VERSION

PUBLIC FILE

NON-CONFIDENTIAL VERSION



第十一出口业务部

The 11th Export Department

### 宠物制品 Pet Products

宠物链条

Pet Chain

狗嚼料

Dog Chews

其它宠物用品

Tie-out Stake, Pet Brush...etc.

### 抽心铆钉及铆接工具 Blind Rivets & Rivetting Tools

抽芯铝铆钉

Aluminium Blind Rivets

抽芯不锈钢铆钉

Stainless Steel Blind Rivets

双翼型抽芯铝铆钉

Multigrip Aluminium Alloy Blind  
Rivets

沟槽型抽芯铝铆钉

Grooved Type Aluminium Alloy  
Blind Rivets

### 打包铁皮

Steel Strapping

发兰打包铁皮

Blue Tempered Steel Strapping

漆漆打包铁皮

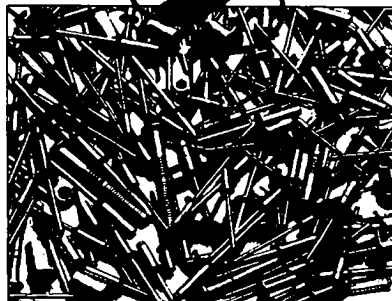
Painted Steel Strapping

镀锌打包铁皮

Zinc-coated Steel Strapping

打包机和打包铁皮轧头

Machines and Clips for Strapping



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA

Tel: (866-21-63538385 • 1804-1818 Fax: (866-21-63534907

E-mail: snetlab@online.sh.cn

NON-CONFIDENTIAL VERSION

84

PUBLIC FILE

NON-CONFIDENTIAL VERSION



## 石材制品

Stone Products

荒石

Blocks

成品大板

Finished Slabs

提格板

Titles

墓碑石

Tombstone

铺路石

Paving Stones

圆柱

Round Pillars

## 大理石雕刻品

Marble Arts Carvings

壁炉

Fireplaces

喷泉

Springs

动物

Animals

人物雕像

Western Style Figures

名作复制品

The Master Piece

## 玻璃制品

Glass Ware

花瓶

Flower Vases

果盘

Table Ware

工艺品摆件

Art Ornaments

杯子

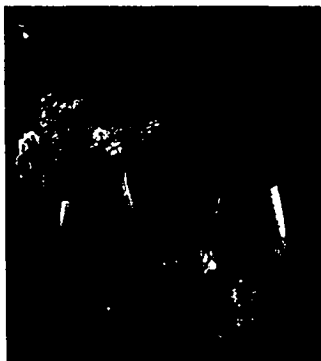
Glasses

烟缸

Ashtrays

高脚杯

Drinking Vessels



上海奔逸进出口公司  
Xin Import & Export Co.

ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel: (86)-21-63530032/63530035/1820 Fax: (86)-21-63535602  
E-mail: kaxinco@public1.su.net.cn



NON-CONFIDENTIAL VERSION

85

PUBLIC FILE

NON-CONFIDENTIAL VERSION



上海五矿浦东公司

Shanghai Minmetals Pudong Co.

## 出口业务

## Export Business

## 钉和丝

## Nails &amp; Wires

## 镀锌铁丝

Galvanized Iron Wire

## 软质黑铁丝

Black Annealed Iron Wire

## 镀锌扁丝

Galvanized Flat Stitching Wire

## 镀铜扁丝

Copper Coated Flat Stitching Wire

## 镀锌丝

PVC-Coated Galvanized Iron Wire

## 镀锌刺铁丝

Galvanized Barbed Iron Wire

## 铁钉

Nails

## 马掌钉

Horse Shoe Nails



## 鸟笼

## Bird Cage

## 保温瓶

## Vacuum Flask

## (Thermos Bottle)



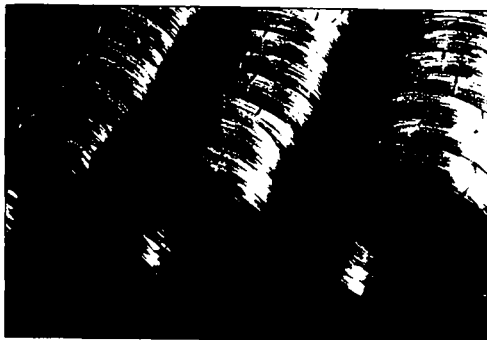
ADD: FL-20, WORLD CENTRE 18 TAO LIN ROAD, PUDONG SHANGHAI 200135 CHINA  
Tel: (0086-21-58213708, 58213198, 58218958, 58217798 Fax: (0086-21-58218182)

NON-CONFIDENTIAL VERSION

86

## PUBLIC FILE

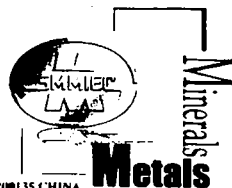
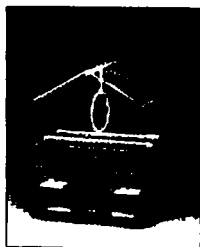
NON-CONFIDENTIAL VERSION



### 进口业务 Import Business

公司主要进口钢铁、金属制品、有色金属和矿产品。同时经营废钢、废船及机械设备等进口业务。已与世界主要钢材和有色金属供应国的厂商建立了良好的业务关系。

The Company deals mainly in the import of steel and steel products, non-ferrous metals and minerals. It also imports scrap steels, scrap ships and all kinds of small machine equipment, etc. A good business relationship with the leading suppliers of steel products and non-ferrous metals in the world has been established through our past business contacts.



ADD: FL-20, WORLD CENTRE 18 TAO LIN ROAD, PUDONG SHANGHAI 200135 CHINA  
Tel: (086-21) 58213700, 58213198, 58210958, 58213798 Fax: (086-21) 58210182

PUBLIC FILE

NON-CONFIDENTIAL VERSION



进出口业务部

The Import Department

## 各类板材

## Steel Plates

热轧中厚板

Hot-rolled Steel Plates

热轧薄板

Hot-rolled Steel in Coils

冷轧薄板

Cold-rolled Steel Sheets

冷轧厚板

Cold-rolled Steel in Coils

造船板

Ship-building Steel Plates

花紋板

Hot Rolled Chequered Steel Plates

碳结板

Carbon Steel Sheets

镀锌钢板

Galvanized Steel Sheets

马口铁

Tin Plate

砂铜片

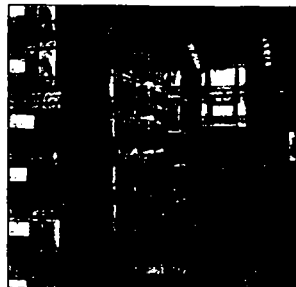
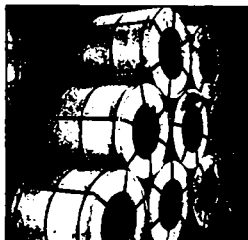
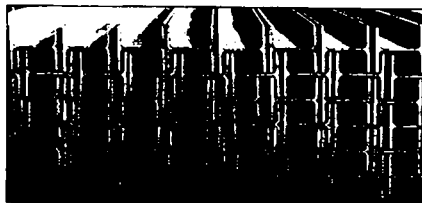
Silicon Steel Sheets

各类合金板

Alloy Steel Plates

各种表面处理钢板

Steel Sheets With Different Surface Treatment



## 各种型 棒材

## Steel Sections and Bars

圆钢

Round Bars

碳结圆钢

Carbon Construction Steel Round

Bars

螺纹钢

Deformed Round Bars

线材

Wire Rods

方钢

Square Bars

角钢

Angle Bars

工字钢

I-Beams

槽钢

Steel Channels

扁钢

Flat Bars

钢坯

Billets



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel 0086-21-61518585 • 1005-1006, 63534609 Fax 0086-21-61516013

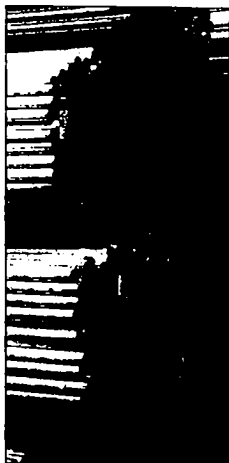
NON-CONFIDENTIAL VERSION

88



PUBLIC FILE

NON-CONFIDENTIAL VERSION



### 各类管材 Steel Tubes

无缝钢管  
Seamless Steel Tubes  
焊接钢管  
Welded Steel Pipes  
不锈钢管  
Stainless Steel Tubes  
铜管  
Brass Tubes

### 各种特殊钢材和黑色金属制品 Special Steel and Steel Products

弹簧钢  
Spring Steel  
不锈钢  
Stainless Steel  
轴承钢  
Ballbearing Steel  
工具钢  
Tool Steel  
易切削钢  
Free Cutting Steel  
钢丝  
Various Steel Wire  
钢丝绳  
Steel Wire Ropes  
焊接材料  
Welding Materials

### 其它 Other Products

有色金属  
Non-ferrous Metals  
有色矿砂  
Non-ferrous Ore  
废有色金属  
Scrapped Non-ferrous Metals  
生铁  
Pig Iron  
矿砂  
Ferrous and Non-ferrous Ore  
铁合金  
Ferroalloys  
非金属矿产品  
Non-metallic Minerals  
贵重金属  
Rare and Precious Metals  
水泥  
Cement  
废钢  
Scrap Steel



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel. (86)-21-61518585 - 1005-1006, 61554609 Fax. (86)-21-61553661

NON-CONFIDENTIAL VERSION

89

PUBLIC FILE

NON-CONFIDENTIAL VERSION



上海五矿黄金希望国际货运有限公司

Shanghai Minmetals Golden Hope  
International Transportation Co., Ltd.

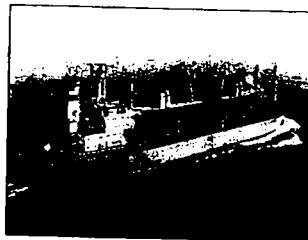
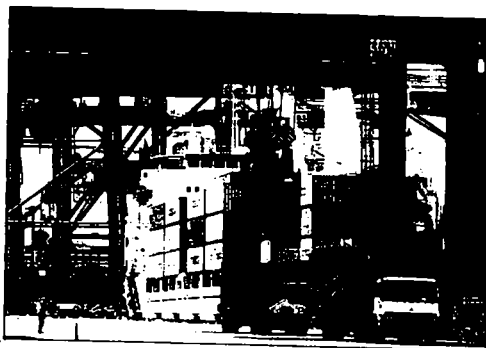
### 国际货运 International Transportation

主管进出口货运业务, 包括  
海运、空运、陆运、船舶和各种国  
际联运。

能够提供运输单据缮制、订  
舱、中转、报关、商检报验、集港  
拆箱、拆箱以及各种接运相关  
服务。

The company is mainly  
engaged in transportation service  
for import and export business by  
ship, truck, air and chartering as  
well as various international  
intermodal transportation.

It provides clients with a wide  
range of services such as transport  
documents preparation, space  
booking, transshipment, customs  
clearance, commodity inspection  
application, container stuffing  
and devanning and other related  
procedures in transportation  
business.



27 ZHONGSHAN ROAD (E.I.), SHANGHAI 200002

Tel: (86)-21-63291818 63234197

Fax: (86)-21-63291348 63219570

E-mail: smmghb@online.sh.cn

NON-CONFIDENTIAL VERSION

90

PUBLIC FILE

NON-CONFIDENTIAL VERSION



## 期货 FUTURES

期货业务部主营铜、铝、锌、锡、镍的期货交易业务。是上海期货交易所创始会员。同时参与进口、国产铜、铝的现货贸易并在期货交易所进行保值、增值。有较多的国内外有色金属客户。竭诚欢迎国内外新老朋友与该部建立和发展更广泛的贸易合作。

As initiative member of the Shanghai Futures Exchange, SHMIEC's futures department mainly deals with futures in Cu, Al, Pb, Zn, Si & Ni. We are also active in physicals of imported & domestic Cu & Al, by doing hedging & spreading on the futures market. In the non-ferrous industry, we have wide connection with many foreign and local customers. We look forward to establishing and developing business cooperation with all friends home and abroad.

期货业务部

Futures Department

SHANGHAI FUTURES TOWER ROOM 2503, 300 SONGJIN ROAD PUDONG SHANGHAI CHINA

Tel: (86)-21-68401147 FAX: (86)-21-68401148

E-mail: wfutures@online.sh.cn

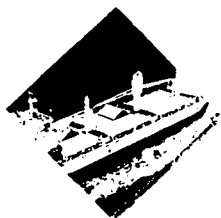


NON-CONFIDENTIAL VERSION

91

PUBLIC FILE

NON-CONFIDENTIAL VERSION



船舶业务部

essel Department

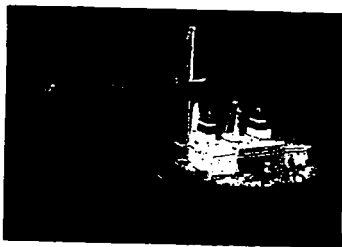
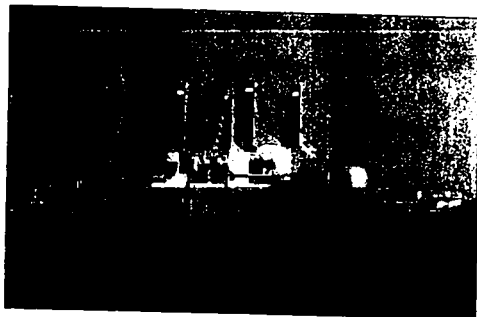
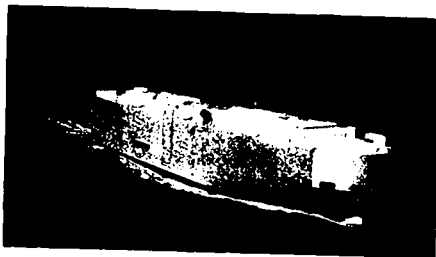
### 船舶进出口及海事 技术服务

Vessel Business &  
Marine Technical Service

船舶业务部主营各类型、旧、  
新船进出口及代理业务。

办理验船、估价、报关、接船、  
修船。代办各类型船舶证书和派遣  
国际船员，同时承接度、旧船拆  
解加工、海上工程勘验和技术服  
务。

The vessel department deals  
mainly in import & export of all  
sorts of scrapped, second-hand  
and new vessels; handling  
customs clearance, vessel  
inspection, repair and evaluation;  
application for vessels'  
certificates and acceptance of  
vessels from abroad; dispatching  
international crew. Apart from  
these, it also undertakes scrapped  
vessels demolition and technical  
service of sea-shore projects.



ADD: 757 GUANGFU ROAD, SHANGHAI 200070 CHINA  
Tel (0906-21-6353855 \* 1011-1012 Fax (0906-21-6353859

NON-CONFIDENTIAL VERSION

92



## 上海市五金矿产进出口公司

SHANGHAI FIVE METAL MINERAL PRODUCTS IMPORT & EXPORT CORPORATION

地址：上海市南京路100号

电话：0086-21-63815858

传真：0086-21-63806500

电报：63006500

电邮：shsmmiec@shsmmiec.com

电报：63006500