



ARROWCREST
GROUP

Public file version

28 May 2012

Ms. Joanne Reid
Director, Operations 2
International Trade Remedies Branch
Australian Customs and Border Protection Service
Customs House
5 Constitution Avenue
CANBERRA ACT 2601

Dear Joanne,

Reference : Arrowcrest reply to Hunt & Hunt Lawyers SEF181 submission on behalf of GM-Holden dated 16 May 2012.

I refer to the SEF181 response from Hunt & Hunt Lawyers (Hunt&Hunt) on behalf of GM-Holden dated 16 May 2012.

Arrowcrest notes that it has responded to earlier submissions from Hunt&Hunt on behalf of GM-Holden in its letters dated 20 February 2012 and 18 April 2012.

1. No injury in the OEM segment.

- Arrowcrest notes that it cannot divulge all of the commercially sensitive material relating to the OEM segment but has provided in its further submission dated 24 May 2012 responses to counter-claims in relation to the injuries arising in the OEM segment as a result of ARWs from China at dumped and subsidized prices.
- Arrowcrest also notes that Hunt&Hunt has not provided any evidence in support of its claim.

2. Injury prior to 2006.

- 2003 to 2005 data submitted with Arrowcrest's application is available for verification.
- Arrowcrest notes that whilst SEF181 acknowledges that Arrowcrest's 2003 to 2005 data was not verified during Customs' visit to Arrowcrest, a comparison of the data provided with import clearance data from China supports the conclusion of causal link.

Page 1 of 6

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- It is clear that the rapid growth in export volumes from China has occurred at the same time as export prices from China have fallen (having nothing to do with the US dollar exchange rate) and the combined effect of the price and volume for ARWs from China has been such as to cause a significant shift in purchasing patterns away from Australian-made AM ARWs towards AM ARWs imported from China at dumped and subsidized prices.

3. A variety of other factors being the cause of the alleged injury.

At page 2, Hunt&Hunt provides a list of points (A through J), that it considers to be other factors that have caused injury to the Australian industry.

Arrowcrest disagrees and has been very careful to provide specific evidence of injury and injury indicators arising in the AM and OEM sectors and has likewise been very careful to ensure that the separation of that evidence from the effects of other factors is completely transparent and traceable.

Arrowcrest has also responded to claims relating to exchange rates, the drop in Toyota's local production and price undercutting as recently as its submission to Customs dated 24 May 2012.

With respect, Hunt&Hunt's point (H) is nonsensical, as if to say that Arrowcrest's supply of OEM ARW spare parts are not of acceptable quality. The ARWs supplied were new parts supplied in compliance with the relevant specifications to an OEM. Hunt&Hunt is suggesting that Arrowcrest cannot meet GM-Holden's current specifications yet fails to provide any evidence to support this claim. Arrowcrest also supplies ARWs to Toyota whose specifications for ARWs exceed those of GM-Holden.

Arrowcrest notes that it has responded to claims made in relation to HSV in earlier submissions.

4. LME prices.

Hunt&Hunt refers once again (at (e) on page 4), to *"the fact that (GM-Holden) purchases ARW with prices based on the LME.."*

The standard procedure in the automotive industry is to link price adjustments to a verifiable, independent benchmark. In the case of parts manufactured from aluminium or aluminium alloys (including ARWs) the globally accepted benchmark is the LME.

However this mechanism for adjusting price (up or down depending on the international movement in the LME published price for pure aluminium) does not detract from Customs' determination that there is a market situation for aluminium and aluminium alloy used in the production of ARWs in China.

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5. The Australian market is different.

Hunt&Hunt suggests at (g){2} on page 5 of their submission that Customs has “unnecessarily accepted the findings of the EC in relation to “Like Goods” even though the facts of the Australian market are different and our client’s operations were not in question in the EC investigation”.

Customs has taken reference from the Australian industry, interested parties and the EC finding, to determine that OEM and AM ARWs are in fact like goods, albeit sold through two distribution channels.

Arrowcrest notes that Hunt&Hunt provides no evidence to show how the Australian market might differ from the European market such that ARWs in that market are any different to ARWs in the Australian market.

6. Diverting from the legislated requirement that (Customs) treat the Chinese market for ARW as a “full market economy”.

Arrowcrest notes that it has responded to a similar claim made on behalf of CITIC, in its submission to Customs dated 23 May 2012.

CITIC (a supplier of ARWs to GM-Holden) has been unable to demonstrate that the GOC has not influenced domestic prices for aluminium and aluminium alloy, given the significant government involvement in the sector and the prevalence of artificially low prices.

Customs has assessed that domestic selling prices for ARWs sold in China are not unsuitable for determining normal values under s.269TAC(1). Customs has replaced artificially low input costs to the goods under consideration in the determination of normal value under s.269TAC(2)(c).

7. 22” wheels for the OEM market should be excluded.

Customs has determined that 22” ARWs are substitutable goods. Arrowcrest certainly possesses the capability to produce 22” ARWs on its existing ARW production lines.

Arrowcrest has also provided Customs with evidence to show that AM and OEM ARWs compete for sales to the ultimate consumer – the driver.

For these reasons alone Arrowcrest maintains that measures should apply to 22” ARWs in both the OEM and AM segments.

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8. Market situation.

Hunt&Hunt says at 6(a), page 7, that GM-Holden "believes that Customs has erred in its finding that a particular market situation exists..".

Customs has determined that "there are various GOC influences that relate to the Chinese aluminium industry" and "the price of ARWs in China is likely to also have been influenced by changes in a determinant of supply, primarily the costs of production, in both the ARWs and upstream markets. Customs considers it is likely there has been a change in supply in ARWs and a consequent impact on ARW prices, brought about in a significant part by the GOC influence on the aluminium industry." Customs considers that "this influence has resulted in lower ARW prices than what would have been the case if the relevant markets operated without GOC intervention."

In its application Arrowcrest also provided extensive evidence of GOC intervention in the aluminium and aluminium alloy industry. Customs has determined (and summarized) the effect of that intervention as follows :

"Direct intervention by the GOC in the form of taxes, tariffs, export licenses and other measures are likely to have impacted the supply of ARWs and the price of ARWs through the reduction of input prices through the impact of the reduced price of bauxite on the supply of alumina, and then the flow-through effects of supply in aluminium, then alloy production, then ARWs itself."

9. CITIC's price is lower than Baoding's.

Hunt&Hunt confirms at (d) on page 8, that GM-Holden pays CITIC a lower price per unit than the amount GM-Holden pays per unit to Baoding.

In its SEF181 response, Arrowcrest alerted Customs to the fact that the European Commission had found that circumvention of measures by Baoding or CITIC was possible.

In the EU inquiry, the investigating authorities were concerned that Baoding Lizhong Group ("Baoding") – another SIE ARW manufacturer – could export ARWs on behalf of CITIC Dicastal as both are State Owned Enterprises:

*"State interference in CITIC Dicastal and Baoding is such that it permits circumvention of measures if individual exporters are given different rates of duty in particular having regard to the fact that these two groups have two common joint ventures producing the product concerned."*¹

¹ Page L117/69, Commission Regulation (EU) No. 404/2010 of 10 May 2010 imposing a provisional anti-dumping duty on imports of certain aluminium wheels originating in the People's Republic of China.

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"As regards CITIC Dicastal, it is a State-owned company directly controlled by the State (the majority of its shares belong to the State). The State interference is such that it permits circumvention of measures if it obtains a different rate of duty. In other words, production of other State-controlled companies could be re-directed through CITIC Dicastal. Concerning the other argument put forward by CITIC Dicastal, the fact that it supplies exclusively car makers in the OEM market does not prevent it from supplying to other clients in the future."²

Arrowcrest is similarly concerned that Baoding could supply ARWs to Australia via CITIC Dicastal at export prices below those determined for non-cooperative Chinese ARW exporters.

Arrowcrest requests that the duties for CITIC Dicastal be determined at the same level as Chinese non-cooperative ARW exporters to prevent the circumvention of measures on future ARW exports to Australia by Chinese SIEs (including Baoding).

10. Economic conditions.

Arrowcrest has responded to claims made by interested parties in relation to the prevailing economic conditions as recently as its submission to Customs dated 24 May 2012, and at (3) above.

Arrowcrest notes that it has survived where others have not, including at Mullins' former AM ARW Australian manufacturing operation and Comalco's former OEM ARW manufacturing operation at Bell Bay, Tasmania.

Hunt&Hunt provides no evidence in support of its claim that Arrowcrest has "high overheads not managed down like with [sic] other manufacturers."

11. Requests for quotation from Holden.

Hunt&Hunt suggests at (g) on page 11 that GM-Holden had not issued Arrowcrest with requests for quotation for ARWs, rather it had only issues a "Request for interest to supply".

However Arrowcrest has provided quotations to GM-Holden for supply of ARWs as recently as 28 September 2010 for GM-Holden's Cruze model. GM-Holden replied that Arrowcrest's quotation was 37% higher than "our expectations based on international market prices." This quotation was in respect of ARWs for GM-Holden's Cruze model which Arrowcrest understands are sourced by GM-Holden from China.

² Page L282/6, Council Implementing Regulation (EU) No 964/2010 of 25 October 2010 imposing a definitive anti-dumping duty and collecting definitively the provisional duty imposed on imports of certain aluminium road wheels originating in the People's Republic of China.

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Arrowcrest has also quoted GM-Holden for ARWs (and steel wheels) for its local production, in 2009 quotations submitted to Harvey Li, the then Global Wheels & Wheel Trim buyer headquartered in Shanghai. Arrowcrest was unsuccessful on that occasion as well.

Copies of GM-Holden correspondence verifying that GM-Holden has in fact issued requests for quotation to Arrowcrest in 2009 and 2010 are attached herewith.

12. Little prospects.

Hunt&Hunt provides no evidence to support its contention that *"there is little real prospect of any increase in sales by Arrowcrest in the OEM in the foreseeable future."*

As noted by Arrowcrest elsewhere, if dumping from China ceased GM-Holden could well find a change of circumstance would encourage them to reconsider sourcing from Arrowcrest.

13. Additional advantage conferred on Toyota.

Arrowcrest does not know what *"additional advantage"* would confer to Toyota as a result of measures on OEM and AM ARWs exported from China at dumped and subsidized prices. (Point (f) on page 12.)

14. Closing remarks.

Arrowcrest would wholly welcome the opportunity to resume supply of wheels to GM-Holden at fair market prices and in doing so Arrowcrest would freely extend to GM-Holden its full support.

Yours sincerely,



Bill Davidson
General Manager

25/05/2012

ROH Automotive Mail - 1804 requested

57
PUBLIC FILE



Bill Davidson <bill.davidson@roh.com.au>

1804 requested

- PUBLIC FILE -

<>

Wed, Feb 11, 2009 at 8:00 AM

To: harvey.li@gm.com

Cc: david.tilbrook@gm.com, catherine.a.kovacic@gm.com, vicky.hao@gm.com

Dear Harvey,

Thank you for your email request for quotation. To ensure that our quotation is correct, would you please email to me the CAD files for these two wheels in AutoCad or iges format ?

Regards,

Bill Davidson

General Manager

ROH Automotive

-----Original Message-----

From: harvey.li@gm.com [mailto:harvey.li@gm.com]

Sent: Tuesday, 10 February 2009 16:13

To: Bill.Davidson@roh.com.au

Cc: david.tilbrook@gm.com; catherine.a.kovacic@gm.com; vicky.hao@gm.com

Subject: 1804 requested

Importance: High

Bill,

I've discussed with Dave on the steel opportunity at ROH. Pls fill 1804 form for below part numbers:

92214939

92214940

I'll review with our engineer on your quote and come back to you if we have queries. Better to explain what's your plan to build up proper tools and what'll be the cost.

I would hope this could be done very soon. Thanks,

Harvey Li 李丰

S&C Purchasing

GM SFO China, GPSC APO

Tel: +86 21 2898 7241

Fax: +86 21 2898 7878

Email: harvey.li@gm.com

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25/05/2012

ROH Automotive Mail - RE: 1804 requested [ATTACHMENT REMOVED]

PUBLIC FILE



2012/02/26 14:14:14 [mailto:harvey.li@gm.com]

RE: 1804 requested [ATTACHMENT REMOVED]

- *PUBLIC FILE* -

<>

Thu, Feb 26, 2009 at 3:17 PM

To: harvey.li@gm.com, catherine.a.kovacic@gm.com, david.tilbrook@gm.com, vicky.hao@gm.com

Dear Catherine, David, Vicky and Harvey,

We will complete the standard quote forms but meanwhile wish to advise the following ex-works Woodville North piece prices for steel and alloy wheels :

92214940 16x7" steel wheel	Black	A\$ [REDACTED] no sticker
	Silver	A\$ [REDACTED] no sticker
92214938 17x4" steel wheel	Black	A\$ [REDACTED] no stickers
	Yellow	A\$ [REDACTED] no stickers
92168591 19x8 alloy wheel	Silver	A\$ [REDACTED]
92196727 18x8 alloy wheel	Machined	A\$ [REDACTED]
92218464 16x7 alloy wheel	Silver	A\$ [REDACTED]

Economics as at 26 Feb-09, including :

590MPa steel US\$ [REDACTED] per tonne, including A\$ [REDACTED] delivery.
 440MPa steel A\$ [REDACTED] per tonne.
 Aluminium US\$ [REDACTED] per tonne LME cash.
 Forex US\$0.64 to A\$1.00

We look forward to hearing from you.

Kind regards
 Bill Davidson
 General Manager
 ROH Automotive

25/05/2012

ROH Automotive Mail - 1804/1810 form

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SS



Bill Davidson <Davidson@roh.com.au>

1804/1810 form

- Public File -

1 page

harvey.li@gm.com <harvey.li@gm.com>
To: Bill.Davidson@roh.com.au

Tue, Aug 11, 2009 at 11:35 AM

Pls apply attached form for your quotation and send back to me. Thanks,

Harvey Li 李丰

Wheels & Wheel trim purchasing

Tel: +86 21 2898 7241

Fax: +86 21 2898 7878

Email: harvey.li@gm.com

Save a tree. Don't print this e-mail unless it's really necessary.

 Cost Breakdown Form 1804 1810.xls
339K

25/05/2012

ROH Automotive Mail - Cruze Wheels

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ROH Automotive Mail - Cruze Wheels

Cruze Wheels

3 messages

- Public File -

mark.l.thomas@gm.com <mark.l.thomas@gm.com>

Fri, Feb 26, 2010 at 10:32 AM

To: bill.davidson@roh.com.au, camillo.luciano@roh.com.au, scott.liddell@roh.com.au

Bill, Camillo and Scott,

Please find attached some preliminary details of wheels proposed for domestic J300.

There is an 18" accessory wheel also, 18x7.5, 105mm PCD,

I'll work on getting you further details next week.

(See attached file: MY 11 Holden J 300 Wheels 31st of July .xlsx)

Regards,

Mark Thomas

Manager Steering Group

GM Holden

+61 3 9647 7815

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MY 11 Holden J 300 Wheels 31st of July .xlsx

174K

Bill Davidson <bill.davidson@roh.com.au>

Mon, Mar 1, 2010 at 5:24 PM

To: mark.l.thomas@gm.com

Cc: camillo.luciano@roh.com.au, scott.liddell@roh.com.au

Mark,

Many thanks for your email. Can you give us the finished weights of these existing wheels, or the target weights if they don't yet exist?

Regards,

Bill Davidson

ROH Automotive

[Quoted text hidden]

Bill Davidson

mark.l.thomas@gm.com <mark.l.thomas@gm.com>

Fri, Mar 5, 2010 at 1:59 PM

To: Bill Davidson <bill.davidson@roh.com.au>

Cc: camillo.luciano@roh.com.au, scott.liddell@roh.com.au

25/05/2012

ROH Automotive Mail - Cruze Wheels

PUBLIC FILE

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Hello Bill,

Masses below:

(Embedded image moved to file: pic05705.gif)

- Public File -

Regards,
Mark Thomas
Manager Steering Group
GM Holden
+61 3 9647 7815

Bill Davidson
<bill.davidson@roh.com.au>

To

mark.l.thomas@gm.com

01/03/2010 05:54
PM

cc

camillo.luciano@roh.com.au,
scott.liddell@roh.com.au

Subject

Re: Cruze Wheels

[Quoted text hidden]



Bill Davidson <bill.davidson@roh.com.au>
To: mark.l.thomas@gm.com

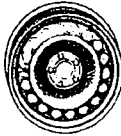
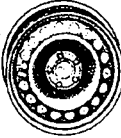



Fri, Mar 5, 2010 at 2:06 PM

Thanks Mark.
Bill Davidson
[Quoted text hidden]

Bill Davidson

- Public File -

For Reference Purposes Only

VEHICLE WHEEL OPTION	J300 CD Patrol 16" Steel	J300 CD Patrol 16" Steel	J300 CD Patrol 17" Alloy	J300 CD Patrol 17" Alloy	J300 SRU SRAPack 17" Alloy
					
WHEEL SIZE	6.5 X 16	6.5 X 16	7J X 17	7J X 17	7J X 17
PCD (mm)	115	115	115	115	115
OFFSET	39	41	42	42	42
COLOR	Black	Black	Silver	Silver	Silver
LOAD RATING (kg)	PR 1060	PR 1220	PR 1060	PR 1060	PR 1060
Hidden Only	PR 1060	PR 1220	PR 1060	PR 1060	PR 1060
9LR	30	30	30	30	30
MAXED TYRE SIZE)	205/50R16	215/50R16	215/50R17 - 225/50R17	215/50R17 - 225/50R17	215/50R17 - 225/50R17
TRIM ASN TYPE	Full Face	Full Face	Button Cap	Button Cap	Button Cap

24/05/2012

ROH Automotive Mail - Fwd: Holden J300 phase 2 localisation workshop - status update



Re: [mailto:jaydeep.solanki@roh.com.au] - PUBLIC FILE -

- PUBLIC FILE -

Fwd: Holden J300 phase 2 localisation workshop - status update

jaydeep.solanki@gmail.com <jaydeep.solanki@gmail.com>
To: Bill Davidson <bill.davidson@roh.com.au>

Thu, Jun 3, 2010 at 12:40 PM

Yes

From: Bill Davidson <bill.davidson@roh.com.au>
To: jaydeep.solanki@gmail.com
Cc: Camillo Luciano <camillo.luciano@roh.com.au>, donal.storey@gmail.com, jim.mandilas@gmail.com, Sam Zullo <sam.zullo@roh.com.au>, Scott Liddell <scott.liddell@roh.com.au>, stuart.adams@gmail.com
Date: 03/06/2010 12:38 PM
Subject: Re: Holden J300 phase 2 localisation workshop - status update

Thanks Jaydeep.

To save us bothering you or Stuart can you tell us candidly is there any real likelihood of you asking us to quote wheels for J300 ?

Bill Davidson

On Thu, Jun 3, 2010 at 11:09 AM, <jaydeep.solanki@gmail.com> wrote:
Bill, Pls keep Stuart Adams as your first point of local contact person for all queries.

We are still working on the timing for J300 RFIs and at this stage, we are not considering any Commodore wheels for localisation.

Regards,

Jaydeep Solanki
Associate Director - Supplier Strategy

Tel: +61-3-9647-2341 Mobile: +61-413-850-924

From: Bill Davidson <bill.davidson@roh.com.au>
To: donal.storey@gmail.com, jaydeep.solanki@gmail.com, jim.mandilas@gmail.com
Cc: Scott Liddell <scott.liddell@roh.com.au>, Camillo Luciano <camillo.luciano@roh.com.au>, Sam Zullo <sam.zullo@roh.com.au>
Date: 02/06/2010 02:35 PM
Subject: Re: Holden J300 phase 2 localisation workshop - status update

25/05/2012

ROH Automotive Mail - ROH quote on current J300 wheels



mailto:bill.davidson@roh.com.au

ROH quote on current J300 wheels

7/25/2012

- PUBLIC FILE -

matthew.lavric@gm.com <matthew.lavric@gm.com>

Mon, Aug 9, 2010 at 10:55 AM

To: bill.davidson@roh.com.au

Hi Bill,

I have been asked to provide you with the necessary details in order to quote the business for local production of the J300 alloy and steel wheels.

A full SOR would take forever to get to you as it would need to be associated to a sourcing package, and go through the global process.

Hence I have attached to this email the following files to give you the information you are after.

- Drawing files of the current Alloy and steel wheels
- New CTS files for wheels that you would be quoting for.
 - Note all the details are in the drawings
 - CTS contains annual volumes (top right hand corner) and label requirements for R1H and Part Number.
- Matrix of current wheels with a list of the Lean Capacity Rates (LCR) below.

The J300 program also has a second 17" wheel.

I have added the LCR's to the matrix.

Please note I did not get the LCR's for the Steel spares, but this volume would be additional to the steel wheel volume.

Please let me know if you require any more information. I'm more than happy to dig it up for you.

Kind regards,
Matt

Matthew Lavric

Project Engineer - Chassis
GM Holden Ltd
191 Salmon St, Port Melbourne, VIC, 3207
+61 3 9647 9003

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5 attachments

25/05/2012

ROH Automotive Mail - ROH quote on current J300 wheels

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
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419K

 CTS files and Matrix for ROH.xlsx
885K

Bill Davidson <bill.davidson@roh.com.au>
To: Scott Liddell <scott.liddell@roh.com.au>

Mon, Aug 9, 2010 at 11:15 AM

[Quoted text hidden]

Bill Davidson

5 attachments

25/05/2012

ROH Automotive Mail - Re: ROH RFQ for J300 steel and alloy wheels.

ROH

[mailto:bill.davidson@roh.com.au]

Re: ROH RFQ for J300 steel and alloy wheels.*- PUBLIC FILE -*

[mailto:bill.davidson@roh.com.au]

Bill Davidson <bill.davidson@roh.com.au>

Wed, Oct 27, 2010 at 9:17 AM

To: jim.mandilas@gm.com

Cc: donal.storey@gm.com, jaydeep.solanki@gm.com, maximo.lluna@gm.com

Thanks Jim.
Bill Davidson

On Wed, Oct 27, 2010 at 8:58 AM, <jim.mandilas@gm.com> wrote:

Hi Bill,

Donal has been working with our Regional Buyer and is awaiting input. He is not in the office this week, so should be able to provide feedback to you after Melb Cup Weekend,

Regards

Jim Mandilas

Manager-Supplier Development

Global Purchasing and Supply Chain

GM Holden Ltd.

SQ Mail Point - H103, Level 1, 191 Salmon Street, Port Melbourne

Victoria, 3207 Australia

☎ Phone: (613) 9038 4607 ☎ Fax: (613) 9547 2598 ☎ Mobile: +61 414 685 201 ☎ E-Mail: jim.mandilas@gm.com

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From: Bill Davidson <bill.davidson@roh.com.au>
To: jim.mandilas@gm.com
Date: 26/10/2010 05:47 PM
Subject: Re: ROH RFQ for J300 steel and alloy wheels.

Hi Jim,

We sent indicative pricing for J300 wheels to Donal Storey on 28 Sep-10. Is it possible to get some feedback ?

Thankyou,
Bill Davidson
ROH Automotive

On Thu, Aug 26, 2010 at 9:47 AM, Bill Davidson <bill.davidson@roh.com.au> wrote:

Hi Jim,

We have the math data for the J300 steel and alloy wheels, including specs and volumes. Matt Laveric sent this to us on 9 August-10. We have not yet received the RFQ package from Harvey Li.

Thanks,
Bill Davidson



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www.royalcanin.com.au

ARW fact check

- PUBLIC FILE -

Bill Davidson <bill.davidson@roh.com.au>

Mon, Apr 23, 2012 at 10:49 AM

To: PLATT Nicole <nicole.platt@customs.gov.au>

Cc: REID Joanne <joanne.reid@customs.gov.au>, John O'Connor <jmoconnor@optusnet.com.au>

Hi Nicole,

This email is in reply to your email this morning asking for the dates that we submitted the tender for the Holden Cruze wheels and the month the result was announced.

Please see below copies of correspondence between an Arrowcrest Director, Allen Bolaffi, and Jaydeep Solanki who was GM-Holden's Manager for Supplier Development at that time.

At that time, 8 June 2011, Mr. Bolaffi confirmed Mr. Solanki's earlier advice that the costs of alloy wheels from China were up to 37% less than ROH's quote for alloy wheels. Mr. Solanki replied denying that he had said "China" but confirming that the differential (37%) was correct.

Thanks,
Bill Davidson
ROH Automotive

---Original Message---

From: jaydeep.solanki@gm.com [mailto:jaydeep.solanki@gm.com]

Sent: Wednesday, 8 June 2011 3:21 PM

To: Allen Bolaffi

Subject: Re: ROH wheels

Allen,

Just for the record, I have never told you where our wheels come from; you have assumed it to be from china and I can not comment our suppliers any further. ROH price for alloy wheels is around 37% hire than our expectations based on international market prices.

I am also unable to offer to you any guidance on possible changes to tooling policy in future.

Please plan your strategic direction purely based on your own market assessment and potential. We can not commit to any future business relationships with ROH.

Regards, JD

Sent from my BlackBerry

--- Original Message ---

From: "Allen Bolaffi" [allen@uhyhn.com.au]

Sent: 08/06/2011 02:35 PM ZE9B

To: Jaydeep Solanki

Subject: ROH wheels

Dear Jaydeep,

Thank you for the call earlier this week.

I confirm your advice that the costs of the wheels coming out of China are up to 37% less than ROH

25/05/2012

ROH Automotive Mail - ARW fact check

quoted for alloy wheels and that in your view there is no prospect of supply of these wheels in the foreseeable future.

I was pleased with your comments about the pricing of the steel wheels for Cruze being competitive and that the only issue was that of the cost of the tooling.

In my board strategy submission I would like to include some consideration of our contribution to the cost of the tooling, either by joint government approaches for tooling subsidies or the use of some existing grant mechanisms, or by partnering with Holden for some cost sharing to retain the manufacturing of componentry in Australia.

Can you consider to what extent you would be prepared to proceed down this path?

Regards,

Allen Bolaff
Partner

- PUBLIC FILE -

25 Peel Street Adelaide 5000

Telephone +61 8 81100999

Direct +61 8 81100997

www.uhyhainesnorton.com.au <<http://www.uhyhainesnorton.com.au/>>



Bill Davidson <bill.davidson@roh.com.au>

- PUBLIC FILE -

ARW fact check - Arrowcrest quotation for Holden Cruze wheels.

11:50:11

Bill Davidson <bill.davidson@roh.com.au>

Mon, Apr 23, 2012 at 10:58 AM

To: PLATT Nicole <nicole.platt@customs.gov.au>

Cc: REID Joanne <joanne.reid@customs.gov.au>, John O'Connor <jmoconnor@optusnet.com.au>

Hi Nicole,

Please see below our indicative quotation for J300 Holden Cruze steel and alloy wheels, which we submitted to GM-Holden on 28 September 2010.

Thanks,

Bill Davidson

ROH Automotive

----- Forwarded message -----

From: Bill Davidson <bill.davidson@roh.com.au>

Date: Tue, Sep 28, 2010 at 2:34 PM

Subject: J300 indicative wheel prices from ROH Automotive

To: donal.storey@gm.com

Cc: Scott Liddell <scott.liddell@roh.com.au>

Hi Donal,

Thank you for the opportunity to submit indicative prices for J300 steel and alloy wheels ex-works Woodville North, S.Aust., as follows :

6.5x16 steel wheel

Option 1 : 8.98kg mass, HSLA materials, \$[REDACTED] ex-works.

Option 2 : 10.4kg mass, mild steel, \$23.40 ex-works.

7x17 alloy wheel, silver as cast finish.

10.5kg target mass, \$[REDACTED] ex-works.

Best regards,

Bill Davidson

General Manager

ROH Automotive

Direct 08 8468 4111

Mobile 0412 22 00 91