



Anti-Dumping Commission

Exporter Questionnaire

SSAB

QUENCHED AND TEMPERED STEEL PLATE EXPORTED TO AUSTRALIA FROM SWEDEN

Case number: 638

Product: Quenched and tempered steel plate

From: Japan, Finland and Sweden

Inquiry period: 1 October 2022 to 30 September 2023

Response due by: 10 January 2024

Extended to: 14 February 2024

Email enquiries to: investigations2@adcommission.gov.au

ADC website: www.adcommission.gov.au

Responses to the exporter questionnaire must be submitted via SIGBOX.
Please contact the Commission on the above email address to request access
to SIGBOX.

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LIST OF ATTACHMENTS

Number	Name	Confidential?
Attachment A-2.5(a)	Company ownership structure SSAB Group	Confidential
Attachment A-2.5(b)	Related companies SSAB Group	Confidential
Attachment A-2.6(b)	List of shareholders	Non-confidential
Attachment A-2.9	Internal organisation chart	Confidential
Attachment A-2.11	General product information	Non-confidential
Attachment A-3.7	Financial accounting flow	Confidential
Attachment A-4.1(1)	SSAB Annual Report 2021	Non-confidential
Attachment A-4.1(2)	SSAB Annual Report 2022	Non-confidential
Attachment A-4.4(1)	Income statement EMEA AB Q4 2022 to Q3 2023	Confidential
Attachment A-4.4(2)	Income statement EMEA AB Q4 2022 to Q3 2023 by reporting unit	Confidential
Attachment A-4.5	2022 Q4 trial balance	Confidential
Attachment A-4.6	202309 trial balance	Confidential
Attachment A-4.7	Chart of account mapping	Confidential
Attachment B-1.4(1)	Internal price list 22Q4	Confidential
Attachment B-1.4(2)	Internal price list 23Q1	Confidential
Attachment B-1.4(3)	Internal price list 23Q2	Confidential
Attachment B-1.4(4)	Internal price list 23Q3	Confidential
Attachment Case No. 638 SSAB EQ spreadsheets		Confidential
Attachment B-3.1(1)	Export sales bundle 1	Confidential
Attachment B-3.1(2)	Export sales bundle 2	Confidential
Attachment D-3.1(1)	Domestic sales bundle 1	Confidential
Attachment D-3.1(2)	Domestic sales bundle 2	Confidential
Attachment G-1.1	Production process	Confidential
Attachment G-2.2(c)	SSAB EMEA AB [CONFIDENTIAL TEXT DELETED – proprietary accounting system] financials	Confidential
Attachment G-2.4	List of cost centres	Confidential
Attachment G-7.6(a)(1)	Iron ore bundle 1	Confidential
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Attachment G-7.6(a)(1)	Coal and coke bundle 1	Confidential
Attachment G-7.6(a)(2)	Coal and coke bundle 2	Confidential
Attachment G-7.6(b)	Raw material purchases supporting information	Confidential
Attachment G-10.4	List of SSAB Oxelosund capital projects	Confidential
Attachment H-3.10(g)(1)	List of SSAB EMEA customers	Confidential
Attachment H-3.10(g)(2)	Contract outcome with Volvo	Confidential
Attachment H-3.12(1)	SSAB EMEA Hardox price guide Q42023	Confidential
Attachment H-3.12(2)	SSAB EMEA Strenx price guide Q42023	Confidential
Attachment I-4.3	SSAB AU advertising material	Non-confidential
Attachment I-4.5(1)	SSAB AU internal price list – June 2023	Confidential
Attachment I-4.5(1)	SSAB AU internal price list – September 2023	Confidential

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire

The Anti-Dumping Commission (Commission) is conducting a continuation inquiry into quenched and tempered steel plate (Q&T steel plate) exported to Australia from Japan, Finland and Sweden.

The Commission will use the information you provide to determine normal values and export prices in the inquiry period (the period). This information will determine whether Q&T steel plate is dumped.

The Commission will collect and use information in accordance with the Commission's Collection and Use of Information Policy.

If you do not manufacture the goods

If you play a role in the export of the goods but do not produce or manufacture the goods (for example, you are a trading company, broker, or vendor dealing in the goods), it is important that you forward a copy of this questionnaire to the relevant manufacturers and inform the Commission of the contact details for these manufacturers immediately.

The Commission will still require your company to complete this exporter questionnaire except Section G – Cost to make and sell.

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the Commission to verify the information, we may deem your company to be an uncooperative exporter. In that case, the Commission must determine a dumping margin having regard to all relevant information.

Therefore, it is in your interest to provide a complete and accurate response to this exporter questionnaire, capable of verification.

Extension requests

If you require a longer period to complete your response to this questionnaire, you must submit a request to the Commission, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date (i.e. 10 January 2024). A request for extension will be rejected if it is received after the due date.

When considering the extension request, the Commission will have regard to:

- the Commission's responsibility to conduct the case in a timely and efficient manner
- the reasons why you could not provide a response within the whole 37-day period and not only within the period remaining between the request and the due date
- ordinary business practices or commercial principles
- the Commission's understanding of the relevant industry
- previous correspondence and previous dealings with your company, and

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- information provided by other interested parties.

More information on extensions can be found in the Customs (Extension of Time and Non-cooperation) Direction 2015 at <https://www.legislation.gov.au/Details/F2015L01736>.

You will be informed of the decision whether your request for an extension has been rejected, granted in full or granted in part. For example, you may be granted an extension to submit all sections except for Section A or you may be granted a shorter extension than you requested.

A summary of any requests and grants of extensions to submit a response to this exporter questionnaire will be published on the public record.

Submitting a response to the exporter questionnaire

Responses to the exporter questionnaire should be lodged via SIGBOX, a secure online document repository. Please contact the Commission on the email address listed on the cover page to request access to SIGBOX.

In submitting the response to the exporter questionnaire, you must answer all questions, include all attachments and spreadsheets, and provide a non-confidential version of your response to this exporter questionnaire.

If your response to this exporter questionnaire contains major deficiencies that, in the Commissioner's view, cannot be quickly and easily rectified in a further response, then your company may be considered as an uncooperative exporter.

Confidential and non-confidential responses

You are required to lodge a confidential version (OFFICIAL: Sensitive) and a non-confidential version (for publishing on the public record) of your response to this exporter questionnaire by the due date. Please ensure that *each page* of information you provide is clearly marked either "**OFFICIAL: Sensitive**" or "**PUBLIC RECORD**".

All information provided to the Commission in confidence will be treated accordingly. The public record version of your questionnaire will be placed on the public record and must contain sufficient detail to allow a reasonable understanding of the substance of the information without breaching confidentiality.

Please be aware that, if at any stage during this inquiry you become aware that you have inadvertently received confidential information submitted by another party, you have a responsibility to:

- notify the Commission
- delete the information from your system, and
- refrain from using, sharing or retaining the information in any way.

A person is not required to provide a summary for the public record if the Commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

All questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. An example of a statement to accompany deleted/blacked out text is:

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[Explanation of cost allocation through the divisions, by reference to machine hours or weight].

If such an explanation is not provided, the Commission may disregard the information in the submission. Where the public record version of your response to the exporter questionnaire does not contain sufficient detail, your company may be requested to resubmit your response with the required level of detail or, if deadlines have passed, the Commission may not have regard to it.

Verification of the information that you supply

The Commission may wish to verify your questionnaire response for completeness, relevance and accuracy of the information to your company's records.

The verification is not meant to be a chance for you to provide new or additional information. The Commission expects your response to the questionnaire to be relevant, complete and accurate.

The verification may include Commission staff visiting your company to conduct onsite verification. Any onsite verification typically commences approximately 2 to 4 weeks after the due date of the response to the exporter questionnaire. To assist with the planning of a verification, please contact the Commission as soon as possible for a potential verification date to be scheduled.

The onsite verification is usually conducted over 4 days. However, in complex cases, it may be scheduled over 5 days. A verification will include a detailed examination of your company's records and we will collect copies of relevant documents. The verification will require the participation of key staff, including your financial accountant, production manager and sales staff. A tour of the manufacturing facility may also be required during the verification.

The Commission may elect to undertake an alternative verification methodology, rather than an onsite verification, to satisfy itself of the completeness, relevance and accuracy of the data.

Note that the Commission may disregard any data or information that is not verified, including new or additional information provided after the verification visit.

A report will be prepared following the verification, which details the outcomes of the verification. This report will be placed on the public record and may include the publication of the preliminarily assessed dumping margin. The Commission considers that the dumping margin is not confidential information, but rather an aggregate figure derived from confidential data.

You will be provided with an opportunity to comment on the accuracy and confidentiality of the verification report prior to its publication on the public record.

For information on the Commission's verification procedures, refer to Anti-Dumping Notice No. 2016/30 available on the Commission's website.

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
- Clearly identify all units of measurement (e.g. kg) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.

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- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the Commission's verification of your data.
- If you cannot present electronic data in the requested format contact the Commission as soon as possible.
- Where possible, electronic data should be shared with the Commission via SIGBOX, a secure online document repository. Please contact the Commission to request access to SIGBOX if required.

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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 Company information	✓
Section B Export sales to Australia	✓
Section C Exported goods & like goods	✓
Section D Domestic sales	✓
Section E Due allowance	✓
Section F Third country sales	✓
Section G Cost to make and sell	✓
Section H Domestic Market	✓
Section I Australian Market	✓
Exporter's Declaration	✓
Non-confidential version of this response	✓

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	✓
B-2.2 Australian sales source	✓
B-4 Upwards sales	✓
B-5 Upwards selling expenses	✓

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D-2 Domestic sales	✓
D-2.2 domestic sales source	✓
F-2 Third country sales	✓
F-2.2 third country sale source	✓
G-3 Domestic CTM	✓
G-3.2 domestic CTM source	✓
G-4.1 SG&A listing	✓
G-4.2 Dom SG&A calculation	✓
G-5 Australian CTM	✓
G-5.2 Australian CTM source	✓
G-7.2 Raw material CTM	✓
G-7.4 Raw material purchases	✓
G-8 Upwards costs	✓

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GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods subject to anti-dumping measures (the goods) are:

Flat rolled products of alloyed steel plate commonly referred to as Quenched and Tempered (“Q&T”) steel plate (although some Q&T grades may not be tempered), not in coils, not further worked than hot rolled, of widths from 600mm up to and including 3,200mm, thickness between 4.5-110mm (inclusive), and length up to and including 14 metres, presented in any surface condition including but not limited to mill finished, shot blasted, primed (painted) or un-primed (unpainted), lacquered, also presented in any edge condition including but not limited to mill edge, sheared or profiled cut (i.e. by Oxy, Plasma, Laser, etc.), with or without any other minor processing (e.g. drilling).

Goods of stainless steel, silicon-electrical steel and high-speed steel, are excluded from the goods covered.

Model Control Code

The model control codes (MCCs) will be used to match export models to identical or comparable domestic models. In addition, the MCCs will be used to determine the profitability of domestic sales in the ordinary course of trade by comparing domestic selling prices to the corresponding cost to make and sell. The MCCs may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

Details of the MCCs for the goods are outlined in Table 1. Export sales data (Section B-2), domestic sales data (Section D-2) and cost to make and sell data (Section G-3, G-4 & G-5) submitted in this response must follow this MCC structure. At a minimum, the data must report sales and cost data separately for each of the mandatory MCC categories identified by the Commission.

Item	Category	Sub-category	Identifier	Sales data	Cost data	Key category
1	Grade	Structural	S	Mandatory	Mandatory	Yes
		Wear	W			
		Armour	A			
2	Tensile strength (this category is only required for “structural” grade Q&T steel plate)	Under 700 Mpa	A	Mandatory	Mandatory	Yes
		700-799 Mpa	B			
		800-899 Mpa	C			
		900-999 Mpa	D			
		Above 1000 Mpa	E			
3	Brinell hardness (this category is	Under 275	A	Mandatory	Mandatory	Yes
		275-324	B			

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	only required for "wear" or "armour" grade Q&T steel plate)	325-374	C			
		375-424	D			
		425-474	E			
		475-524	F			
		525-575	G			
		Above 575	H			
4	Thickness	Under 8mm	1	Optional	Optional	No
		8-50mm	2			
		Above 50mm	3			
5	Width	Under 2000mm	A	Optional	Optional	No
		2000mm-3000mm	B			
		Above 3000mm	C			
6	Length	Under 6.5m	1	Optional	Optional	No
		6.5-8.49m	2			
		8.5-10.5m	3			
		Above 10.5m	4			

Table 1: MCC structure

Item 1: *Grade* refers to quenched and tempered steel plate manufactured for structural, wear or armour purposes.

Item 2: *Tensile strength* refers to minimum tensile strength.

Item 3: *Brinell hardness* refers to the indentation hardness of the steel plate.

Item 4: *Thickness* refers to the minimum thickness.

Item 5: *Width* refers to the width of the steel plate.

Item 6: *Length* refers to the length of the steel plate.

As an example of how goods should be classified using only the mandatory categories of this MCC structure: Structural grade quenched and tempered steel plate with a tensile strength of 850 MPa would have an MCC of "S-C".

If there are models manufactured and sold by your company that do not align with the MCC structure above, this should be raised by lodging a submission with the Commission as soon as is practicable, but no later than the time this questionnaire is due, otherwise the response may be considered deficient.

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SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name:	Christopher Ramsten
Position in the company:	Head of Finance
Telephone:	+46 8 4545700
E-mail address	christopher.ramsten@ssab.com

2. If you have appointed a representative, provide their contact details:

Name:	Daniel Moulis
Position:	Partner Director Moulis Legal
Address:	6/2 Brindabella Circuit Brindabella Business Park Canberra Airport ACT 2609
Telephone	+61 2 6163 1000
Mobile:	+61 414 221 224
E-mail address:	daniel.moulis@moulislegal.com
All communications in relation to this matter should be directed to Daniel Moulis in the first instance.	

In nominating a representative, you are granting authority to the Commission to discuss matters relating to the case with the nominated representative, including your company's confidential information.

3. Please provide the location of where your company's financial records are held.

SSAB's top-level financial records are maintained at SSAB AB's headquarters office at Klarabergsviadukten 70, 111 64 Stockholm, Sweden.

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4. Please provide the location where your company's production records are held.

SSAB's production records are maintained at its factory sites in Sweden which are located in Oxelösund, Borlänge and Luleå. [CONFIDENTIAL TEXT DELETED – production location details]

5. Please provide the location of your company's production plant manufacturing the goods under consideration.

[CONFIDENTIAL TEXT DELETED – production location details]

A-2 Company information

1. What is the legal name of your business?

SSAB EMEA AB ("SSAB" or "SSAB EMEA")

2. Does your company trade under a different name and/or brand? If yes, provide details.

No, our company does not trade under a different name and/or brand.

3. Was your company ever known by a different legal and/or trading name? If yes, provide details.

SSAB Oxelösund AB changed its name to SSAB EMEA AB on 1 December 2010.

4. Provide a list of your current board of directors and any changes in the last two years.

The current board of SSAB consists of Martin Lindqvist, Johnny Sjöström, Mikael Henriksson, Olavi Huhtala and Erik Jansson. Deputy board members are Patrick Sjöholm and Sven-Erik Rosén.

Jonas Bergstrand left his position as board member at the time of the annual general meeting held in June 2023.

There were no other changes to the board during the last two years.

5. Is your company part of a group (e.g., parent company with subsidiaries, common ownership, joint-ventures)?

Yes. SSAB is fully owned by SSAB AB.

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If yes, provide:

- (a) A diagram showing the complete ownership structure, and

A full listing of SSAB subsidiaries is set out in the tables on pages 165-167 of Attachment A-4.1(2) - SSAB Annual Report 2022.

For a diagram of same please refer to Attachment A-2.5a - Company ownership structure - SSAB Group [CONFIDENTIAL ATTACHMENT].

- (b) A list of all related companies and its functions.

Please refer to Attachment A-2.5b - Related companies - SSAB Group [CONFIDENTIAL ATTACHMENT]

6. Is your company or parent company publicly listed?

SSAB is not publicly listed. SSAB AB, SSAB's parent company, is listed.

If yes, please provide:

- (a) the stock exchange where it is listed, and

SSAB AB is listed on Nasdaq Stockholm and has a secondary listing on Nasdaq Helsinki.

- (b) any principal shareholders¹

Please refer to Attachment A-2.6b – List of shareholders.

If no, please provide:

- (a) A list of all principal shareholders and the shareholding percentages.

Not applicable.

7. What is the overall nature of your company's business? Include details of the products that your company manufactures and sells and the market your company sells into.

SSAB is a manufacturer and distributor of quenched and tempered plate and other advanced high strength steel. SSAB sells its products all over the world via well-integrated supply chains.

¹ Principal shareholders are those who are 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.

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

- (a) produce or manufacture
- (b) sell in the domestic market
- (c) export to Australia, and
- (d) export to countries other than Australia.

SSAB performs all these functions.

9. Provide your company's internal organisation chart.

Please refer to Attachment A-2.9 – Internal organisation chart [CONFIDENTIAL ATTACHMENT].

10. Describe the functions performed by each group within the organisation.

Group/office	Function
[CONFIDENTIAL TEXT DELETED – detailed internal corporate organisation and functions]	

11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.

Please refer to Attachment A-2.11 – General product information.

A-3 General accounting information

1. What is your financial accounting period?

1 January 1 to 31 December (calendar year).

2. Are your financial accounts audited? If yes, who is the auditor?

SSAB's financial accounts are audited. SSAB's auditor is Ernst & Young.

3. What currency are your accounts kept in?

Swedish Kronor (SEK)

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4. What is the name of your financial accounting system?

The financial accounting system is [CONFIDENTIAL TEXT DELETED – proprietary accounting system]. The consolidation system used is [CONFIDENTIAL TEXT DELETED – proprietary accounting system].

5. What is the name of your sales system?

In Oxelösund, the sales system is [CONFIDENTIAL TEXT DELETED – proprietary accounting system]. In Borlänge, the sales system is [CONFIDENTIAL TEXT DELETED – proprietary accounting system].

6. What is the name of your production system?

The production system for plate is [CONFIDENTIAL TEXT DELETED – proprietary accounting system] and for steel/slabs is [CONFIDENTIAL TEXT DELETED – proprietary accounting system].

7. If your financial accounting, sales and production systems are different, how do the systems interact? Is it electronically or manual? Please provide a detailed explanation and include diagrams.

The production systems do not interact with the general ledger. [CONFIDENTIAL TEXT DELETED – proprietary accounting system] and [CONFIDENTIAL TEXT DELETED – proprietary accounting system] are interacting.

Please refer to Attachment A-3.7 – Financial accounting flow [CONFIDENTIAL ATTACHMENT].

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

No, our accounting practices do not differ in any way from the generally accepted accounting principles in Sweden.

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.

Yes. Effective 1st January 2023, we adopted new accounting rules in accordance with IFRS “Configuration or Customisation Costs in a Cloud Computing Arrangement” (IAS 38).

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A-4 Financial Documents

1. Please provide the two most recently completed annual reports and/or financial statements for your company and any other related companies involved in the production and sale of the goods.

Please refer to:

- Attachment A-4.1(1) – SSAB Annual Report 2021
- Attachment A-4.1(2) – SSAB Annual Report 2022

2. If the financial statements in A-4.1 are audited, provide a copy of the audit management letters from your auditor accompanying the audited financial statements.

Please refer to auditors report on page 180 of Attachment A-4.1(2) – SSAB Annual Report 2022.

3. If the financial statements in A-4.1 are unaudited, provide for each company:
 - (a) the tax returns relating to the same period, and
 - (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.

Not applicable. SSAB's financial statements are audited.

4. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods fall into for:
 - (a) the most recent financial year, and
 - (b) the period.

With respect to the most recent two financial years, please refer to:

- Attachment A-4.1(1) – SSAB Annual Report 2021
- Attachment A-4.1(2) – SSAB Annual Report 2022

With respect to the investigation period, please refer to:

- Attachment A-4.4(1) - Income statement EMEA AB Q4 2022 to Q3 2023 [CONFIDENTIAL ATTACHMENT]
- Attachment A-4.4(2) - Income statement EMEA AB Q4 2022 to Q3 2023 by reporting unit [CONFIDENTIAL ATTACHMENT]

5. If the period is different to your financial period, please provide:

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- (a) income statements directly from your accounting information system covering the most recent financial period and the period, or
- (b) quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

Please refer to SSAB's response to questions A-4.4(a) and (b) above.

- 6. Please provide a copy of your company's trial balance (in Excel) covering the period and the most recent financial year.

Please refer to:

- **Attachment A-4.5 – 2022 Q4 trial balance [CONFIDENTIAL ATTACHMENT]**
- **Attachment A-4.6 – 202309 trial balance [CONFIDENTIAL ATTACHMENT]**

Attachment A-4.5 shows the Q4 trial balance (October to December 2022) and Attachment A-4.6 shows the 202309 trial balance (January to September 2023). Combining both will enable the Commission to see the inquiry period results.

- 7. Please provide your company's chart of accounts (in Excel).

Please refer to Attachment A-4.7 - Chart of account mapping [CONFIDENTIAL ATTACHMENT].

If any of the documents are not in English, please provide a complete translation of the documents.

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SECTION B EXPORT SALES TO AUSTRALIA

B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and representatives (e.g. agents) including:
 - (a) marketing and advertising activities
 - (b) price determination and/or negotiation process
 - (c) order placement process
 - (d) order fulfilment process and lead time
 - (e) delivery terms and process
 - (f) invoicing process
 - (g) payment terms and process

The SSAB group operates a modern, commercial, tax-compliant, international production and supply chain from its input suppliers through to its final customers within the SSAB group.

The [CONFIDENTIAL TEXT DELETED – number] main methods of making sales of goods transactions within and by SSAB are as follows:

[CONFIDENTIAL TEXT DELETED – different ways SSAB addresses the market]

- transferred/sold to stock owned by either the mill itself or local group company, for subsequent sale to external customers.

The clear majority of sales to Australia take place by way of the [CONFIDENTIAL TEXT DELETED – number] of these methods. The process by which this occurs is as follows:

- 1) SSAB AU is a 100% owned subsidiary of SSAB EMEA, and it is SSAB AU that sells products for sale on the Australian market. Prices between SSAB EMEA AB and SSAB AU are determined in accordance with the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations as adopted by SSAB. The policy pursues the arm's length and local profit objectives of the Guidelines.
- 2) [CONFIDENTIAL TEXT DELETED – internal price methodologies adopted by SSAB in accordance with OECD Guidelines]
- 3) [CONFIDENTIAL TEXT DELETED – external price methodologies adopted by SSAB AU] SSAB AU actively monitors the market for price information to assist it in complying with its pricing policies and to inform its price review and updates for the purposes of quotations to Australian customers.

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- 4) [CONFIDENTIAL TEXT DELETED – external price methodologies adopted by SSAB AU]
- 5) [CONFIDENTIAL TEXT DELETED – external price methodologies adopted by SSAB AU]
- 6) [CONFIDENTIAL TEXT DELETED – offshore sales by SSAB EMEA]

The actual ordering, product flow and payment/invoicing procedures are as follows:

- Production rationing – SSAB EMEA operates at high capacity utilisation. There is high international demand for its premium steel products. Accordingly, it has to restrict its internal product distribution that is available to each region and country. [CONFIDENTIAL TEXT DELETED – logistics information re supply lead times].
- Order placement process – orders are placed by SSAB AU's sales team internally through SSAB's Group EDI system. [CONFIDENTIAL TEXT DELETED – product availability and internal order acceptance procedures]. At this time an official mill order confirmation will be emailed to SSAB AU stating acceptance of the order, [CONFIDENTIAL TEXT DELETED – product availability and internal order acceptance procedures].
- Order fulfilment process and lead time – [CONFIDENTIAL TEXT DELETED – product availability and internal order acceptance procedures] plates are loaded on either a truck to the port of Göteborg (West coast of Sweden) and then loaded on to a RoRo Vessel (RoRo shipments) or into a container (container shipments) at the harbour in Oxelösund.
 - For RoRo shipments the products are loaded onto trucks at the mill and transported from Oxelösund to Göteborg where they are handed over to the contracted Carrier (Sea freight starts) and they move the material on to their RoRo ship. [CONFIDENTIAL TEXT DELETED – logistics information].
 - For container shipments the products are loaded into container and transported by train to the port of Norrköping (East coast of Sweden) where the container is handed over to the contracted carrier (Sea freight starts) [CONFIDENTIAL TEXT DELETED – logistics information].
- Delivery terms and process – SSAB EMEA ships to Australia on [CONFIDENTIAL TEXT DELETED – Incoterms]. The goods will arrive in Australia by SSAB EMEA's logistics provider. From there, SSAB AU will organise for its logistics provider to [CONFIDENTIAL TEXT DELETED – logistics information and commercial services provided] transporting them to SSAB AU's warehouse.
- Invoicing process – [CONFIDENTIAL TEXT DELETED – invoicing process].
- Payment terms – [CONFIDENTIAL TEXT DELETED – payment terms].

2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:

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- (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details.
- (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details.
- (c) How is the exchange rate determined in your accounting system and how often is it updated?

Sales to Australia are denominated [CONFIDENTIAL TEXT DELETED – currency of sale].

3. Are any customers of the goods exported to Australia related to your company? If yes, please provide the details of each related customer and provide details on how the selling price is set.

SSAB AU is ultimately wholly owned by SSAB EMEA. SSAB EMEA sells the products to SSAB AU and SSAB AU sells the product in the Australian market.

G&G Mining Fabrication Pty Ltd was a 100% owned subsidiary of SSAB EMEA up until 28 June 2023. Their prices always have been decided in exactly the same way as SSAB AU decides on its prices to unrelated customers.

As already mentioned, the prices between SSAB EMEA and SSAB AU are set internally, in accordance with the OECD Guidelines, [CONFIDENTIAL TEXT DELETED – internal price methodologies adopted by SSAB in accordance with OECD Guidelines].

4. If sales are in accordance with price lists or price extras list, provide copies of these lists.

Please refer to the following:

- **Attachment B-1.4(1) - Internal price list 22Q4 [CONFIDENTIAL ATTACHMENT]**
- **Attachment B-1.4(2) - Internal price list 23Q1 [CONFIDENTIAL ATTACHMENT]**
- **Attachment B-1.4(3) - Internal price list 23Q2 [CONFIDENTIAL ATTACHMENT]**
- **Attachment B-1.4(4) - Internal price list 23Q3 [CONFIDENTIAL ATTACHMENT]**

5. Do your export selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

The one distribution channel utilised has been from manufacturer in Sweden to the distributor in Australia.

6. Did you provide on-invoice discounts and/or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes,

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provide a description and explain the terms and conditions that must be met by the customer to obtain the discount and/or rebate.

[CONFIDENTIAL TEXT DELETED – information about discounts and rebates]

7. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

[CONFIDENTIAL TEXT DELETED – information about credit and debit notes]

8. In establishing the date of sale, the Commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:

- (a) What date are you claiming as the date of sale?
- (b) Why does this date best reflect the material terms of sale? Any claim for an adjustment would need to substantively address:
- whether, why, and to what degree, the considerations in determining price differed between export and domestic sales
 - whether the materials cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials
 - whether contracts were entered into for the materials purchases, and materials inventory valuation.

The Commission has consistently determined SSAB's export price on a deductive basis.

B-2 Australian sales listing

1. Complete the worksheet named "B-2 Australian sales"
- This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If there are any direct selling expenses incurred in respect of the exports to Australia not listed in the spreadsheet, add a column. For example, if the delivery terms make you responsible

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for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “B-2.2 Australian sales source” [CONFIDENTIAL ATTACHMENT].

2. Complete worksheet “B-2.2 Australian sales source” showing the relevant source of the data used for each column of worksheet “B-2 Australian sales”.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “B-2.2 Australian sales source” [CONFIDENTIAL ATTACHMENT].

B-3 Sample export documents

1. Select the two largest invoices by value and provide the following documentation:

- contracts
- purchase order and order confirmation
- commercial invoice and packing list
- proof of payment and accounts receivable ledger
- documents showing bank charges
- invoices for inland transport
- invoices for port handling and other export charges
- bill of lading
- invoices for ocean freight and marine insurance (if applicable)
- country of origin certificates (if applicable)

If the documents are not in English, please provide a translation of the documents.

Please refer to:

- Attachment B-3.1(1) – Export sales bundle 1 [CONFIDENTIAL ATTACHMENT]
- Attachment B-3.1(2) – Export sales bundle 2 [CONFIDENTIAL ATTACHMENT]

2. For each document, please annotate the documents or provide a table reconciling the details in the “B-2 Australian sales” listing to the source documents in B-3.1.

This is considered to be self-explanatory in light of details that appear in the export sales bundle documents.

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B-4 Reconciliation of sales to financial accounts

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in B-2, D-2 and F-2 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "B-4 Upwards sales" [CONFIDENTIAL ATTACHMENT].

2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the "B-4 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "B-4 Upwards sales" [CONFIDENTIAL ATTACHMENT].

3. For any amount in the "B-4 Upwards sales" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column D of the worksheet, and
 - highlight or annotate the amount shown in the source document, and
 - provide the account code and sub-account code (if applicable) at column E of the worksheet.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "B-4 Upwards sales" [CONFIDENTIAL ATTACHMENT], which is not hard-coded and for which data source indications have been maintained.

B-5 Reconciliation of direct selling expenses to financial accounts

1. Please complete the worksheet named "B-5 Upwards selling expense" to demonstrate that the direct selling expenses (e.g. Inland transport) in B-2 and D-2 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "B-5 Upwards selling expenses" [CONFIDENTIAL ATTACHMENT].

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2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the “B-5 Upwards selling expense” worksheet. If the documents include spreadsheets, all formulas used must be retained.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “B-5 Upwards selling expenses” [CONFIDENTIAL ATTACHMENT].

3. For any amount in the “B-5 Upwards selling expense” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
- the name of the source document, including the relevant page number, in column C of the worksheet, and
 - highlight or annotate the amount shown in the source document, and
 - provide the account code and sub-account code (if applicable) at column D of the worksheet.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “B-5 Upwards selling expenses” [CONFIDENTIAL ATTACHMENT], which is not hard-coded and for which data source indications have been maintained.

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SECTION C EXPORTED GOODS & LIKE GOODS

The Commission considers the MCC structure in and of itself is not likely to be commercially sensitive information. Any claim that disclosing the MCC information is confidential or would adversely affect your business or commercial interests must be raised by lodging a submission as soon as practicable, but no later than the time this questionnaire is due

[CONFIDENTIAL TEXT DELETED – submissions on information confidentiality]

C-1 Models exported to Australia

1. Fully describe all of the goods your company exported to Australia during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the goods exported to Australia.

During the period, SSAB exported the following products to Australia from Sweden:

[CONFIDENTIAL TEXT DELETED – individual model types exported to Australia]

For more detail about the products, please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “B-2 Australian sales” specification sheet [CONFIDENTIAL ATTACHMENT].

2. Provide a list of MCCs of the goods exported to Australia. This must cover all MCCs listed in the Australian sales listing in B-2. This list must be disclosed in the public record version of the response.

[CONFIDENTIAL TEXT DELETED – submissions on information confidentiality]

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “B-2 Australian sales” [CONFIDENTIAL ATTACHMENT]. The MCCs of the goods exported to Australia in the period were:

- A--F-2-B-1
- A--H-1-B-1
- A--H-2-B-1
- S-B--1-B-3
- S-B--2-B-2
- S-B--2-B-3

- S-B--2-C-2
- S-B--3-A-1
- S-B--3-B-1
- S-B--3-B-2
- W--C-2-B-1
- W--C-3-A-1
- W--C-3-B-1
- W--E-3-B-1
- W--F-2-B-2
- W--F-2-B-3
- W--F-2-C-2
- W--F-2-C-3
- W--F-3-B-1
- W--G-2-B-2
- W--H-2-B-1

C-2 Models sold in the domestic market

1. Fully describe all like goods your company sold on the domestic market during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the like goods sold on the domestic market.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "D-2 Domestic sales" [CONFIDENTIAL ATTACHMENT]. During the period, SSAB sold the following products in Sweden:

- AM125H2
- AM125H3
- AR HIACE
- Armox 300T
- Armox 370H
- Armox 370T CL1
- Armox 370T CL2
- Armox 400S
- Armox 440T
- Armox 500T

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- **Armox 500X**
- **Armox 520T**
- **Armox 600T**
- **Duroxite 100**
- **FF AR 450**
- **Hardox 400**
- **Hardox 450**
- **Hardox 500**
- **Hardox 500 Tuf**
- **Hardox 550**
- **Hardox 600**
- **Hardox Extreme**
- **Hardox HiAce**
- **Hardox HiTemp**
- **SSAB AR450 FF**
- **Strenx 1100 E**
- **Strenx 1300 E**
- **Strenx 700 E**
- **Strenx 700 EM**
- **Strenx 700 F**
- **Strenx 900 E**
- **Strenx 960 E**
- **Strenx 960 EZ**

For more detail about the products, please refer to:

- **Hardox products - [Your guide to Hardox® wear steel products](#)**
- **Strenx products - [Your guide to Strenx® structural steel](#)**
- **Armox products - [Product offer and datasheets Armox](#)**

2. Provide a list of MCCs of like goods sold on the domestic market. This must cover all MCCs listed in the domestic sales listing in D-2.

- This list must be disclosed in the public record version of the response.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “D-2 Domestic sales” [CONFIDENTIAL ATTACHMENT]. The MCCs of the goods sold on the domestic market in the period were:

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- A--B-2-B-1
- A--C-1-B-1
- A--C-2-A-1
- A--C-2-B-1
- A--C-2-B-2
- A--C-3-B-1
- A--D-1-A-1
- A--D-2-A-1
- A--D-2-B-1
- A--D-2-B-2
- A--E-1-B-1
- A--E-2-A-1
- A--E-2-B-1
- A--E-2-B-2
- A--E-3-A-1
- A--F-1-A-1
- A--F-1-B-1
- A--F-2-A-1
- A--F-2-B-1
- A--H-1-A-1
- A--H-1-B-1
- A--H-2-B-1
- S-B--1-A-1
- S-B--1-B-1
- S-B--2-A-1
- S-B--2-B-1
- S-B--2-B-2
- S-B--2-B-3
- S-B--2-B-4
- S-B--3-A-1
- S-B--3-B-1
- S-B--3-B-2
- S-D--1-A-1

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- S-D--1-A-3
- S-D--1-B-1
- S-D--2-A-1
- S-D--2-B-1
- S-D--2-B-2
- S-D--2-B-3
- S-D--2-B-4
- S-D--3-A-1
- S-D--3-A-4
- S-D--3-B-1
- S-E--1-B-1
- S-E--2-A-1
- S-E--2-B-1
- S-E--2-B-4
- W--D-2-A-1
- W--D-2-B-1
- W--D-2-B-2
- W--E-1-B-1
- W--E-1-B-2
- W--E-2-A-1
- W--E-2-B-1
- W--E-2-B-2
- W--E-2-B-4
- W--E-3-B-1
- W--F-1-B-1
- W--F-2-A-1
- W--F-2-B-1
- W--F-2-B-2
- W--F-2-B-4
- W--F-3-B-1
- W--F-3-B-2
- W--F-3-B-3
- W--G-2-B-1

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- W--G-3-B-1
- W--H-1-A-1
- W--H-1-B-1
- W--H-2-A-1
- W--H-2-B-1

C-3 Internal product codes

1. Does your company use product codes or stock keeping unit (SKU) codes?

If yes:

- Provide details of the product or SKU coding system for the goods, such as a legend or key of the meaning for each code within the product or SKU code.
- Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.
- Provide a table of showing the product or SKU codes for each MCC.

If no:

- Provide details on the method used to identify the MCC in the sales and cost spreadsheets.

The products were matched to the MCC codes according to the format requested by the Commission. We note that this is a matter that is always the subject of, and is well suited to, verification. SSAB will make available all evidence and explanation that may be required.

SECTION D DOMESTIC SALES

D-1 Domestic sales process

1. Provide details (and diagrams if appropriate) of the domestic sales process of your company and any other related entities including:
 - (a) marketing and advertising activities
 - (b) price determination and/or negotiation process
 - (c) order placement process
 - (d) order fulfilment process and lead time
 - (e) delivery terms and process
 - (f) invoicing process
 - (g) payment terms and process

SSAB sells its products to its customers in Sweden through its domestic sales department.

- **Customers will contact SSAB in order to source the Q&T plate they require. This contact will usually be made by phone or email. However please refer to our answers to questions D-1.2 and D-1.3 regarding sales to Tibnor.**
- **Once SSAB has received an inquiry from a customer, it will negotiate the price with the customer. [CONFIDENTIAL TEXT DELETED – product availability and internal order acceptance procedures]. Upon making this determination SSAB will confirm the order with the customer and enter the order into its internal systems.**
- **Once the order is filled it will be dispatched to the customer. [CONFIDENTIAL TEXT DELETED – delivery terms and practices]. SSAB will pack the products internally using fumigated dunnage. The transportation of the products is undertaken by third parties, who deliver it to the customer at SSAB's behest. [CONFIDENTIAL TEXT DELETED – delivery types].**
- **Once an order is dispatched SSAB will invoice the customer. [CONFIDENTIAL TEXT DELETED – credit terms].**
- **[CONFIDENTIAL TEXT DELETED – delivery types].**
- **[CONFIDENTIAL TEXT DELETED – types of sales agreements with customers].**
- **[CONFIDENTIAL TEXT DELETED – payment terms].**

2. Are any domestic customers related to your company? If yes, please provide the details of each related customer and provide details on how the selling price is set.

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Yes. Tibnor AB is related to SSAB EMEA.

Tibnor AB is a trader which is 100% owned by SSAB Group. SSAB EMEA sells Q&T plate to Tibnor ([CONFIDENTIAL TEXT DELETED – number] Tibor entities), which is kept in its stock. The price for this stock is negotiated [CONFIDENTIAL TEXT DELETED – negotiation details], on the basis of contemporary price levels in each country eg Sweden, Finland and Denmark.

3. If sales are in accordance with price lists or price extras list, provide copies of these lists.

[CONFIDENTIAL TEXT DELETED – information about price lists] Prices are determined on an order-by-order basis, taking into consideration the market conditions at the point of sale and the type and quantity of the products sold.

The one exception to this is Tibnor AB. Tibnor AB is a trader which is 100% owned by SSAB Group. SSAB EMEA sells Q&T plate to Tibnor, which is kept in its stock. The price for this stock is negotiated [CONFIDENTIAL TEXT DELETED – negotiation details], on the basis of contemporary price levels.

4. Do your domestic selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Yes, SSAB EMEA sells to different types of customers on the domestic market with individual pricing agreed for each customer's orders, influenced by its level, volume and type of sale.

5. Did you provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the customer to obtain the discount and/or rebate.

[CONFIDENTIAL TEXT DELETED – information about discounts and rebates]

6. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the like goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

[CONFIDENTIAL TEXT DELETED – information about credit and debit notes]

7. In establishing the date of sale, the Commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:

(a) What date are you claiming as the date of sale?

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(b) Why does this date best reflect the material terms of sale? You would need to substantively address:

- whether, why, and to what degree, the considerations in determining price differed between export and domestic sales
- whether the materials cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials
- whether contracts were entered into for the materials purchases, and materials inventory valuation.

For the antidumping purposes of this inquiry the date of domestic sale, being the date on which the material terms of sale are agreed, is the order date. On that date the domestic buyer is committed to the sale at the price then agreed, and the details are entered into SSAB's financial system and acknowledged to the customer.

D-2 Domestic sales listing

1. Complete the worksheet named "D-2 Domestic sales"

- This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
- If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.
- 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-2 above, add a column for each item. For example, certain other selling expenses incurred.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "D-2 Domestic sales" [CONFIDENTIAL ATTACHMENT].

2. Complete worksheet "D-2.2 domestic sales source" listing the source of the data used for each column in worksheet "D-2 domestic sales".

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "D-2 domestic sales source" [CONFIDENTIAL ATTACHMENT].

D-3 Sample domestic sales documents

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1. Select the two largest invoices by value and provide the following documentation:

- Contracts
- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment and accounts receivable ledger
- Documents showing bank charges
- Delivery invoices

Please refer to:

- **Attachment D-3.1(1) - Domestic sales bundle 1 [CONFIDENTIAL ATTACHMENT]**
- **Attachment D-3.1(2) - Domestic sales bundle 2 [CONFIDENTIAL ATTACHMENT]**

If the documents are not in English, please provide a translation of the documents.

2. For each document, please annotate the documents or provide a table reconciling the details in the “D-2 Domestic sales” listing to the source documents in D-3.1.

This is considered to be self-explanatory in light of details that appear in the domestic sales bundle documents.

D-4 Reconciliation of sales to financial accounts

This section is not required if you have completed B-4.

Not required. Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “B-4 Upwards sales” [CONFIDENTIAL ATTACHMENT].

1. Please complete the worksheet named “B-4 Upwards sales” to demonstrate that the sales listings in D-2 and F-2 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents, other than those in A-4, D-2 and F-2, required to complete the “B-4 Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.

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3. For any amount in the "B-4 Upwards sales" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column D of the worksheet, and
 - highlight or annotate the amount shown in the source document, and
 - provide the account code and sub-account code (if applicable) at column E of the worksheet.

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SECTION E DUE ALLOWANCE

E-1 Credit expense

1. Do you provide credit to any domestic customers in relation to sales of like goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:
 - (a) Do you provide a rolling credit facility to your domestic customers (i.e. no specific payment terms agreed at the time of sale)? If yes:
 - i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
 - ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover.

[CONFIDENTIAL TEXT DELETED – information about credit provided to customers]

- (b) Do you have short term borrowings or an overdraft facility denominated in your local currency? If yes, what is the interest rate, or average of interest rates?

[CONFIDENTIAL TEXT DELETED – information about short term borrowings]

- (c) Do you have term deposits or other cash product (e.g. bonds) denominated in your local currency? If yes, what is the interest rate, or average of interest rates?

[CONFIDENTIAL TEXT DELETED – information about term deposits and other cash products].

2. Do you provide credit to any Australian customers in relation to sales of the goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:
 - (a) Do you provide a rolling credit facility to your Australian customers (i.e. no specific payment terms agreed at the time of sale)? If yes:
 - i. Calculate the accounts receivable turnover for each Australian customer (credit sales divided by the average accounts receivable).
 - ii. Calculate the average credit term for each Australian customer by dividing 365 by the accounts receivable turnover.

[CONFIDENTIAL TEXT DELETED – information about rolling credit facilities]

- (b) If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):

[CONFIDENTIAL TEXT DELETED – currency of sale]

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- i. Do you have short term borrowings or an overdraft facility denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

[CONFIDENTIAL TEXT DELETED – currency of sale]

- ii. Do you have term deposits or other cash product (e.g. bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

[CONFIDENTIAL TEXT DELETED – currency of sale]

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?

SSAB uses fumigated dunning as the packing for domestic sales.

2. What is the packaging used for your export sales of the goods to Australia?

The form of packing does not differ between export and domestic sales.

3. If there are distinct differences in packaging between your domestic and export sales:

- (a) Provide details of the differences.
- (b) Calculate the weighted average packaging cost for each model sold on the domestic market.
- (c) Calculate the weighted average packaging cost for each model exported to Australia.

Not applicable.

E-3 Delivery

1. Are any domestic sales of like goods delivered to the customer? If yes, how were the transportation costs calculated in the domestic sales listing in D-2?

Yes, domestic sales of like goods are delivered to the customer in almost all cases. These freight costs were derived from the standard template coming from [CONFIDENTIAL TEXT DELETED – proprietary accounting system] to [CONFIDENTIAL TEXT DELETED – proprietary accounting system].

2. What are the delivery terms of the export sales of the goods to Australia?

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[CONFIDENTIAL TEXT DELETED – Incoterms].

3. If the delivery terms of the Australian sales includes delivery to the port, how was the inland transport calculated in the Australian sales listing in B-2?

Inland transport cost calculation is based on standard costs which are in turn based on logistics invoices and average fill rate.

[CONFIDENTIAL TEXT DELETED – logistics details and numbers]

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, tab “B-2.3 Mill to export port calculations” [CONFIDENTIAL ATTACHMENT].

4. If the delivery terms of the Australian sales includes port handling and other export charges, how were these expenses calculated in the Australian sales listing in B-2?

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, tab “B-2.3 Sea freight calculations” [CONFIDENTIAL ATTACHMENT].

5. If the delivery terms of the Australian sales includes ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2?

See answer to question E-3.3.

6. If the delivery terms of the Australian sales includes marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2?

Marine insurance cost is calculated at [CONFIDENTIAL TEXT DELETED – marine insurance rates]. This is the rate of the insurance premium payable under SSAB’s global marine insurance policy for those years.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, tab “”, column AN [CONFIDENTIAL ATTACHMENT].

7. If the delivery terms of the Australian sales includes delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?

[CONFIDENTIAL TEXT DELETED – Incoterms]

E-4 Other direct selling expenses

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1. Do you provide sales Commissions for domestic sales of like goods and/or export sales of the goods? If yes, provide details.

[CONFIDENTIAL TEXT DELETED – information about commissions]

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:

- What is the rate of value-added tax (VAT) on sales of the goods and like goods?

VAT in Sweden is 25%.

- How is VAT accounted for in your records in relation to sales of the goods and like goods?

For domestic supplies VAT rate of 25% is applied, for export VAT rate of 0% is applied, and for intra-Community supplies VAT rate of 0% is also applied.

- Do you receive a VAT refund in relation to sales of the goods and/or like goods?

No

- Do you receive a remission or drawback of import duties on inputs consumed in the production of the goods or like goods?

No.

3. Are there any other direct selling expenses incurred by your company in relation to domestic sales of like goods?

- These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

No other direct selling costs, only indirect SGA costs.

4. Are there any other direct selling expenses incurred by your company in relation to export sales of the goods to Australia?

- These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

No other direct selling costs, only indirect SGA costs

E-5 Other adjustment claims

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1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.
 - An adjustment will only be made where there is evidence that the difference affects price comparability.
 - Refer to Chapter 15 of the *Dumping and Subsidy Manual (December 2021)*² for more information.

SSAB EMEA reserves the right to continue to check its records and sales practices in order to bring forward and establish any identified adjustments at the verification so as to ensure a fair comparison.

² Available on the Commission's website.

SECTION F THIRD COUNTRY SALES

F-1 Third country sales process

1. Are your sales processes to any third country (i.e. exports to countries other than Australia) different to the sales process described in B-1.1? If yes, provide details of the differences.

[CONFIDENTIAL TEXT DELETED – comparative information about third country markets]

2. Are there any third country customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

The following third country customers are related to SSAB and are part of its international supply chain:

[CONFIDENTIAL TEXT DELETED – list of companies related to SSAB in SSAB's international supply chains]

3. In establishing the date of sale, the Commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:

- (a) What date are you claiming as the date of sale?
- (b) Why does this date best reflect the material terms of sale? Any claim for an adjustment would need to substantively address:
 - whether, why, and to what degree the considerations in determining price differed between export and domestic sales.
 - whether the material cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials.
 - whether contracts were entered into for the materials purchases, and materials inventory valuation.

Given that the question relates to the date of sale of exports to third countries, we would only note that with respect to Australian sales the Commission has consistently determined SSAB's export price on a deductive basis.

F-2 Third country sales listing

1. Complete the worksheet named "F-2 Third country sales"
 - This worksheet lists all export sales, summarised by country, customer and MCC, to third countries of like goods invoiced within the period.
 - While sales may be made in different currencies and on different shipping terms the sales listing also seeks to record an Ex-works value of these sales in your local currency.
 - If you have claimed in F-1.3 that the date of sale is one other than the invoice date, then add sales with your claimed date of sale.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

2. Complete worksheet "F-2.2 third country sales source" listing the source of the data for each column in the worksheet "F-2 third country sales".

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "F-2 Third country sales" [CONFIDENTIAL ATTACHMENT].

F-3 Differences in sales to third countries

1. Are there any differences in sales to third countries which may affect their comparison to export sales to Australia? If yes, provide details.

Yes, there are always market differences and other differences when trying to compare prices in and to different countries.

SECTION G COST TO MAKE AND SELL

G-1 Production process

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

Please refer to Attachment G-1.1 – Production process. [CONFIDENTIAL ATTACHMENT]

2. Are any of your suppliers related to your company (regardless of whether it is relevant to the manufacture of the goods)? If yes, please provide details including the product or services supplied by the related company.

Yes. SSAB EMEA AB is 50% owner of Oxelösund Hamn AB. The other 50% is owned by the community of Oxelösund. Oxelösund Hamn AB operates the port of Oxelösund where SSAB EMEA unloads raw materials, as for example iron ore and coal.

For completeness, we note that SSAB purchases iron ore from LKAB. LKAB owns 10.50% of the shares in SSAB. However, SSAB is not directly or indirectly controlled by LKAB and purchase prices are commercially negotiated.

G-2 Cost accounting practices

1. Is your company's cost accounting system based on actual or standard costs (budgeted)?

SSAB's cost accounting system used to allocate costs to plate products is based on standard costs.

2. If your company uses standard costs:

- (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?

Yes.

- (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?

Yes.

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(c) How were those variances allocated?

Variances were allocated by a percent increase of standard costs. [CONFIDENTIAL TEXT DELETED – variance numbers].

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheets “G-3 Domestic CTM” and “G-5 Australian CTM” columns [9], [10], [11] and [12] [CONFIDENTIAL ATTACHMENT] for the allocation of the variance in cost.

Please refer to Attachment G-2.2(c) - SSAB EMEA AB [CONFIDENTIAL TEXT DELETED – proprietary accounting system] financials, sheet "MILL_OXEL variance analysis" for the variance calculations.

(d) Provide details of any significant or unusual cost variances that occurred during the period.

Please refer to Attachment G-2.2(c) – SSAB EMEA AB [CONFIDENTIAL TEXT DELETED – proprietary accounting system] financials, sheet "MILL_OXEL variance reference"

3. Briefly explain your cost accounting practices (e.g. job costing, process costing).

[CONFIDENTIAL TEXT DELETED – cost accounting practices].

4. Do you have different cost centres in your company’s cost accounting system? If yes, list the cost centres, provide a description of each cost centre and the allocation methodology used in your accounting system.

Please refer to Attachment G-2.4 – List of cost centres. [CONFIDENTIAL ATTACHMENT]

5. To what level of product specificity (models, grades etc.) does your company’s cost accounting system normally record production costs?

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

6. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

7. Has your company engaged in any start-up operations in relation to the goods? If yes:

(a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.

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

Not applicable. SSAB has not engaged in any start-up operations in relation to the goods.

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

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

9. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production?

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

10. What are the valuation methods for scrap, by products, or joint products?

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

11. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details.

[CONFIDENTIAL TEXT DELETED – management and corporate allocation details and numbers]

G-3 Cost to make on domestic market

- Complete the worksheet named "G-3 Domestic CTM".
 - This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

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- If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "G-3 Domestic CTM" [CONFIDENTIAL ATTACHMENT].

2. Complete worksheet titled "G-3.2 domestic CTM source" listing the source of the data for each column of the worksheet "G-3 domestic CTM".

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "G-3.2 Domestic CTM source" [CONFIDENTIAL ATTACHMENT].

G-4 Selling, General & Administration expenses

1. Complete the worksheet named "G-4.1 SG&A listing".
 - This worksheet lists all selling, general and administration expenses, including finance expenses, by account code for the most recent accounting period and the period.
 - Exclude any SG&A amount in respect of:
 - unrealised foreign exchange gains/loss
 - provision for doubtful debt
 - any other income/expense not directly/indirectly related to the manufacture or sale of the goods or like goods.
 - The SG&A listing should reconcile to the trial balance and/or income statement.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet "G-4.1 SG&A listing" [CONFIDENTIAL ATTACHMENT].

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation".
 - This worksheet calculates the unit domestic SG&A for each MCC.
 - You must provide this list in electronic format using the template provided.
 - Please use the formulas provided.

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Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-4.2 SG&A calculation” [CONFIDENTIAL ATTACHMENT].

G-5 Cost to make the goods exported to Australia

1. Complete the worksheet named "G-5 Australian CTM".
 - This worksheet lists the quarterly cost to make the Australian models of the goods under consideration by MCC manufactured within the period.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as ‘other costs’ if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all Australian sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-5 Australian CTM” [CONFIDENTIAL ATTACHMENT].

2. Complete worksheet titled “G-5.2 Australian CTM source” listing the source of the data for each column of worksheet “G-5 Australian CTM”.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-5.2 Australian CTM source” [CONFIDENTIAL ATTACHMENT].

G-6 Cost allocation method

1. What is the allocation method used to complete in G-3 domestic CTM and G-5 Australian CTM for:
 - (a) raw materials
 - (b) labour
 - (c) manufacturing overheads

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

2. Select the domestic model (export model if you have no domestic production of like goods) with the largest production volume over the period and provide worksheets demonstrating the allocation method described in G-6.1 from your normal cost accounting system to the cost for that model reported in G-3.1.

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

G-7 Major raw material costs

1. What are the major raw materials used in the manufacture of the goods?

These are iron ore, coal and coke, and alloys. [CONFIDENTIAL TEXT DELETED – raw materials percentages]

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company which your company exercise control? If yes, complete the worksheet named “G-7.2 Raw material CTM” for these raw materials.
 - This worksheet lists the quarterly cost to make the raw material manufactured within the period.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as ‘other costs’ if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

[CONFIDENTIAL TEXT DELETED – information about raw materials from SSAB subsidiaries] a minor number of coal and alloy purchases

Oxelösund Hamn AB operates the port of Oxelösund where SSAB EMEA unloads raw materials, such as iron ore and coal. It is 50% owned by SSAB EMEA AB, [CONFIDENTIAL TEXT DELETED – cost accounting practices].

3. Using the domestic cost data in “G-3 Domestic CTM” (use “G-5 Australian CTM” if you have no domestic production of like goods), calculate the weighted average percentage of each raw material cost (listed in G-7.1) as a proportion of total cost to make.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet G-7.3 “Share of costs” [CONFIDENTIAL ATTACHMENT].

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4. For each raw material identified in G-7.3 which individually account for 10% or more of the total cost to make, complete the worksheet named “G-7.4 Raw material purchases”.
- This worksheet lists all raw material purchases (i.e. transaction by transaction) purchased by your company within the period.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-7.4 Raw material purchases” [CONFIDENTIAL ATTACHMENT].

5. Provide a table listing the source of the data for each column of the “G-7.4 Raw material purchases” listing.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-7.4 Raw material purchases”, column [17] [CONFIDENTIAL ATTACHMENT].

6. For each raw material:
- (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.

Please refer to:

- **Attachment G-7.6a(1) – Iron ore bundle 1 [CONFIDENTIAL ATTACHMENT]**
- **Attachment G-7.6a(2) – Iron ore bundle 2 [CONFIDENTIAL ATTACHMENT]**
- **Attachment G-7.6a(1) – Alloy bundle 1 [CONFIDENTIAL ATTACHMENT]**
- **Attachment G-7.6a(2) – Alloy bundle 2 [CONFIDENTIAL ATTACHMENT]**
- **Attachment G-7.6a(1) – Coal and coke bundle 1 [CONFIDENTIAL ATTACHMENT]**
- **Attachment G-7.6a(2) – Coal and coke bundle 2 [CONFIDENTIAL ATTACHMENT]**

- (b) Reconcile the total value listed in “G-7.4 Raw material purchases” listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Please refer to:

- **Attachment G-7.6(b) - Raw material purchases supporting information, sheet “Consolidation [CONFIDENTIAL TEXT DELETED – proprietary accounting system] and [CONFIDENTIAL TEXT DELETED – proprietary accounting system] GL”**

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- Attachment G-2.2(c) – SSAB EMEA AB [CONFIDENTIAL TEXT DELETED – proprietary accounting system] financials, sheet “MILL_OXEL [CONFIDENTIAL TEXT DELETED – proprietary accounting system] - Reference”

7. Are any of the suppliers in “G-7.4 Raw material purchases” listing related to your company? If yes, please provide details on how the price is set.

[CONFIDENTIAL TEXT DELETED - information about supplies from SSAB subsidiaries]. Please see above comments with respect to question G-7.2. These relate to minor number of coal and alloy purchases

G-8 Reconciliation of cost to make to audited financial statements

1. Please complete the worksheet named “G-8 Upwards costs” to demonstrate that the cost listings in G-3 and G-5 are complete.
- You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-8 Upwards costs” [CONFIDENTIAL ATTACHMENT].

2. Please provide any documents, other than those in A-4, G-3 and G-5, required to complete the “G-8 Upwards costs” worksheet.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-8 Upwards costs” [CONFIDENTIAL ATTACHMENT].

3. For any amount that is hard coded (i.e. not a formula), please cross-reference by providing:
- the name of the source document, including the relevant page number, in column D of the worksheet and
 - highlight or annotate the amount shown in the source document and
 - provide the account number and sub-account number (if applicable) at column E of the worksheet.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-8 Upwards costs” [CONFIDENTIAL ATTACHMENT].

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G-9 Production of the goods under consideration

1. Describe your company's practices for capturing the production quantities reported at worksheets "G-3 domestic CTM" and "G-5 Australian CTM". Consider using a flowchart in answering this question.

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

2. Outline the types of source documents kept by the company in relation to production quantities and how the production quantities are entered into the accounting system. Consider using a flowchart in answering this question.

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

3. Briefly explain the reasons for any differences between:

- (a) the production quantities reported at worksheet "G-3 domestic CTM" and the sales volumes reported at worksheet "D-2 domestic sales" and
- (b) the production quantities reported at worksheet "G-5 Australian CTM" and the sales volumes reported at worksheet "B-2 Australian sales".

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

4. Describe how your company determines its volume of production for the goods, product mix of production and the factors that contribute to these decisions. How frequently are production volumes determined for the goods? How frequently is the product mix determined for the goods?

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

5. What lead times are typically needed to adjust volumes of production for the goods?

[CONFIDENTIAL TEXT DELETED – cost accounting practices]

G-10 Capacity utilisation

1. Please complete the worksheet named "G-10 Capacity Utilisation".
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

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Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-10 Capacity Utilisation” [CONFIDENTIAL ATTACHMENT].

2. Explain how the production capacity and capacity utilisation has been calculated.

SSAB Oxelösund steel plant is a 1,500 thousand tonnes per annum (TTPA) blast furnace (BF) and basic oxygen furnace (BOF) steel plant.

Normal production capacity is based on factory parameters, experience, performance specifications, and possible outcomes. Capacity utilisation is conservatively managed within those parameters.

3. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:

Yes, SSAB does have warehousing facilities.

- (a) What is the capacity of these facilities?

[CONFIDENTIAL TEXT DELETED – numbers]

- (b) What was the monthly amount of inventory maintained during the inquiry period?

Monthly average around [CONFIDENTIAL TEXT DELETED – numbers]

- (c) What is the average period of time that inventory is retained (describe how this is calculated)?

[CONFIDENTIAL TEXT DELETED – inventory calculations and numbers]

4. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.

Please refer to Attachment G-10.4 – List of SSAB Oxelosund capital projects [CONFIDENTIAL ATTACHMENT].

5. For each plant capable of producing inputs that could be utilised to make the goods, provide the date that production facility came into operation and the production capacity of the plant over the past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “G-10 Capacity Utilisation” [CONFIDENTIAL ATTACHMENT].

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6. List any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.

**Please refer to Attachment G-10.4 – List of SSAB Oxelosund capital projects
[CONFIDENTIAL ATTACHMENT].**

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SECTION H DOMESTIC MARKET

H-1 Prevailing conditions of competition in the domestic market

1. Describe the domestic market for the goods and the prevailing conditions of competition within the market, including:

(a) Provide an overall description of the domestic market which explains its main characteristics and trends over the past five years.

Overall market is steadily increasing thanks to upgrading from mild steel to high strength steel. Some volumes in the past have been purchased from other countries outside of Sweden due to lower cost. More recently, this has started to change [CONFIDENTIAL TEXT DELETED – SSAB market intelligence].

(b) Provide the sources of demand for the goods in the domestic market, including the categories of customers, users or consumers of the product.

End user segments are heavy machinery, heavy transport, mining, lifting, forestry/agriculture, and process industry [CONFIDENTIAL TEXT DELETED – SSAB market intelligence].

(c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b).

[CONFIDENTIAL TEXT DELETED – sales revenue chart]

(d) Describe the factors that influence consumption/demand variability in the domestic market, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production.

Please refer to H-1.1(a).

(e) Describe any market segmentations in the domestic market; such as geographic or product segmentations.

Please refer to answer H-1.1(c).

(f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e).

Please refer to answer H-1.1(c).

(g) Describe the way in which domestically produced goods and imported goods compete in the domestic market.

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Both domestic and foreign mills use local distributors foremost. Competition parameters are quality, availability, price relative to quality, technical support and lead time from mill.

(h) Describe the ways that the goods are marketed and distributed in the domestic market.

Bigger and medium sized OEMs are supplied directly from mills, sometimes with a back-to-back agreement with a distributor/stockholder while after market and smaller OEMs are supplied from stockholders.

(i) Describe any other factors that are relevant to characteristics or influences on the domestic market for the goods.

[CONFIDENTIAL TEXT DELETED – SSAB market intelligence]

Provide documentary evidence to support the responses made to questions 1(a) to (i).

2. Provide a diagram which describes the domestic market structure for the goods, ensuring that all categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the domestic market.

[CONFIDENTIAL TEXT DELETED – SSAB market intelligence]

3. Describe the commercially significant market participants in the domestic market for the goods at each level of trade over the inquiry period. Include in your description:

- names of the participants
- the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.)
- a description of the degree of integration (either vertical or horizontal) for each market participant and
- an estimation of the market share of each participant.

[CONFIDENTIAL TEXT DELETED – SSAB market intelligence]

4. Describe the regulatory framework of the domestic market for the goods as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.

Swedish market has free trade within EU. Imports into the EU are subject to equal treatment by EU members.

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5. Describe any entry restrictions for new participants into the domestic market for the goods. Your response could include information on:
- resource ownership
 - patents and copyrights
 - licenses
 - barriers to entry
 - import restrictions and
 - government regulations (including the effect of those government regulations).

There are no entry restrictions in a legal sense, other than EU trade and customs regulations. In a non-legal sense, any new entrant will need to establish a position in a competitive market where existing mill→supplier→end-user relationships are already in place.

In responding to question 6 ensure that relevant regulations are referenced.

H-2 Goods in the domestic market

1. Generally describe the range of goods offered for sale in the domestic market. The description should include all like goods, including those produced by your company. Your description could include information about:
- quality differences
 - price differences
 - supply/availability differences
 - technical support differences
 - the prevalence of private labels/customer brands
 - the prevalence of generic or plain labels
 - the prevalence of premium labels and
 - product segmentation.

[CONFIDENTIAL TEXT DELETED – numbers] brands are primarily recognised in the market for the products. Hardox and Strenx are recognized as the market leaders and command a premium due to high availability, high level of quality and technical assistance. Raex is a brand for distributors with limited technical assistance, but high availability. [CONFIDENTIAL TEXT DELETED – SSAB market intelligence]

2. Describe the end uses of the goods in the domestic market from all sources.

See answer to question H-1.1(c).

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3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the domestic market. Rank these preferences or purchasing influencers in order of importance.

- **Product quality**
- **Availability**
- **Price relative to quality**
- **Technical assistance**
- **Lead time**

4. Identify if there are any commercially significant market substitutes in the domestic market for the goods.

Some applications can be substituted by mild steel, cast iron, aluminium, overlay products, etc. However in the key applications that are suited to advanced steels it is unlikely to find inferior steels (less suitable for the task).

5. Have there been any changes in market or consumer preferences in the domestic market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

[CONFIDENTIAL TEXT DELETED – SSAB market intelligence]

H-3 Relationship between price and cost in the domestic market

1. Describe the importance of the domestic market to your company’s operations. In your response describe:

- (a) the proportion of your company’s sales revenue derived from sales of the goods in the domestic market, and

[CONFIDENTIAL TEXT DELETED – number]%.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “F-2 Third country sales”, Tab B-4 Upwards sales [CONFIDENTIAL ATTACHMENT].

- (b) the proportion of your company’s profit derived from sales of the goods in the domestic market.

[CONFIDENTIAL TEXT DELETED – number]%.

Please refer to Attachment Case No. 638 SSAB EQ spreadsheets, sheet “F-2 Third country sales”, Tab B-4 Upwards sales [CONFIDENTIAL ATTACHMENT].

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In responding to question 1 please provide evidence supporting calculations.

[CONFIDENTIAL TABLE DELETED – sales revenue details and numbers]

These calculations have been replicated from Attachment Case No. 638 SSAB EQ spreadsheets, tab “B-4 Upward sales” [CONFIDENTIAL ATTACHMENT].

2. Is your organisation/business entity the price leader for the goods in the domestic market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

[CONFIDENTIAL TEXT DELETED – SSAB market position]

SSAB’s quality and reputation makes it the high-end and higher-priced product in all markets in which it competes. Hardox and Strenx have high brand name recognition and high product quality and availability. SSAB has a proven ability to provide both basic and advanced technical assistance, and its salesforce is strongly focused on these products.

3. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in the domestic market. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

[CONFIDENTIAL TEXT DELETED – sales strategies]

4. Explain the process for how the selling prices of the goods for the domestic market by your business are determined. Provide copies of internal documents which support how pricing is determined.

[CONFIDENTIAL TEXT DELETED – price setting practices]

5. How frequently are your domestic selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.

[CONFIDENTIAL TEXT DELETED – price setting practices]

6. Rank the following factors in terms of their influence on your pricing decisions in the domestic market, with the most important factor ranked first and the least important factor ranked last:
- Competitors’ prices
 - Purchase price of raw materials

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- Cost to make and sell the goods
- Level of inventory
- Value of the order
- Volume of the order
- Value of forward orders
- Volume of forward orders
- Customer relationship management
- Supplier relationship management
- Desired profit
- Brand attributes
- Other [please define what this factor is in your response]

- **Value for the customer vs other brands/materials**
- **Customer volume for the period**
- **Market price development**
- **Distance to competitor pricing**

7. Describe the relationship between selling price and costs to make and sell in the domestic market. Does your company maintain a desired profit margin for the goods?

[CONFIDENTIAL TEXT DELETED – price setting practices]

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the domestic market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

[CONFIDENTIAL TEXT DELETED – information about price reductions]

9. Does the volume of sales to a customer or the size of an order influence your selling price in the domestic market? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume-based prices for the goods. Provide copies of internal documents which support your claims in response to this question.

Yes, could be on individual order, but it is the customer's total demand and our position as main supplier that are the most decisive points in this aspect. We are not amenable to suddenly low price offers for customers that are not pre-existing

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customers, it badly impacts on sense of loyalty/relationship with existing large volume customers. [CONFIDENTIAL TEXT DELETED – SSAB market intelligence]

10. Does your organisation/business entity use sales contracts in the domestic market? If yes:

(a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?

[CONFIDENTIAL TEXT DELETED – number]%

(b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?

[CONFIDENTIAL TEXT DELETED – information about exclusivity contracts]

(c) How frequently are sales contracts renegotiated?

[CONFIDENTIAL TEXT DELETED – price setting practices]

(d) How frequently are price reviews conducted between contracts?

[CONFIDENTIAL TEXT DELETED – price setting practices].

(e) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.

[CONFIDENTIAL TEXT DELETED – price setting practices]

(f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?

[CONFIDENTIAL TEXT DELETED – price setting practices]

(g) Provide a list of the customers under contract during the inquiry period and copies of the two largest contracts in terms of sales revenue. Provide a complete translation of the documents.

Please refer to:

- Attachment H-3.10(g)(1) – List of SSAB EMEA customers [CONFIDENTIAL ATTACHMENT]
- Attachment H-3.10(g)(2) – Contract outcome with Volvo [CONFIDENTIAL ATTACHMENT]

11. Provide copies of any price lists for the goods used in the domestic market during the inquiry period. If you do not use price lists, describe the transparency of your prices in the domestic market.

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[CONFIDENTIAL TEXT DELETED – price setting practices]

12. How do you differentiate pricing for different products/models of the goods in the domestic market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.

[CONFIDENTIAL TEXT DELETED – SSAB price setting practices] higher steel grades are more complicated to produce and therefore comes with higher prices.

Please refer to Attachment H-3.12 – Example of SSAB EMEA internal price guidelines [CONFIDENTIAL ATTACHMENT]

13. Do you tier or segment your domestic customers for the goods in terms of pricing? If yes, provide:
- (a) a general description of how this is done
 - (b) list the factors that influence pricing differentiation in different tiers or segments, and
 - (c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

Provide copies of internal documents which support your claims in response to this question.

[CONFIDENTIAL TEXT DELETED – information about tiered/segmented pricing]

14. Do you sell the goods to related entities in the domestic market? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide a copy of any internal document relevant to establishing pricing to related parties.

Yes. As per Attachment A-4.1(2) – SSAB Annual Report 2022 at page 27:

Tibnor is the Group's distributor of a full range of steel and non-ferrous metals in the Nordics and Baltics. Tibnor buys and sells materials produced both by SSAB and other suppliers, and plays an important role in securing SSAB's leadership in the Nordic home market. The focus is on increased growth, for example in components, by increased online sales and a strong local presence. Tibnor works closely with many strategic suppliers and partners to create better solutions for customers in Nordic industry.

Price is set by market pricing influences to distributors in the domestic market. Sales revenue to Tibnor as proportion of all sales revenue is [CONFIDENTIAL TEXT DELETED – number]% of total revenue

H-4 Marketing and sales support in the domestic market

1. How does your company market the goods in the domestic market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).

We market through physical brochures, samples, web pages, social media, fairs, advertising, technical assistance, quality and availability. We also have a pilot project offering a fossil free product presently under development referred to as SSAB Zero, which supports and promotes SSAB's market-leading investment and development in green solutions and future use of renewable energy in steel making.

SSAB Sweden also markets on its own name through it being renowned for the highest quality Q&T plate on the market.

2. Does your company conduct brand segmentation in the domestic market for the goods? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.

Yes, Hardox and Strenx are premium brands, Raex is the distribution brand for abrasive resistant steels. See the table in the answer to question H-1 3.

3. Provide examples of your domestic advertising of the goods over the past five years. If you have not used advertising provide examples of any other promotion campaigns for the goods you have conducted over the inquiry period.

Please refer to these examples:

- <https://www.ssab.com/sv-se/varumarken-och-produkter/hardox>
- <https://www.hardoxwearparts.com/sv-se>

4. How many people are in your domestic market sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

There are [CONFIDENTIAL TEXT DELETED – number] members of the domestic sales team, as follows:

[CONFIDENTIAL TEXT DELETED – information about staffing]

[CONFIDENTIAL TEXT DELETED – information about remuneration].

5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.

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[CONFIDENTIAL TEXT DELETED – price setting practices]

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SECTION I AUSTRALIAN MARKET

I-1 Prevailing conditions of competition in the Australian market

1. Describe the Australian market for the goods and the prevailing conditions of competition within the market, including:

- (a) Provide an overall description of the Australian market for the goods which explains its main characteristics and trends over the past five years.

The Australian Q&T market is specialised and heavily impacted by quality and consistency of the steel required by the customer concerned. The Q&T product market is a niche market, with better outcomes achieved by suppliers whose products have higher performance and safety when being fabricated by the customer and when used by the ultimate owner/operator.

[CONFIDENTIAL TEXT DELETED – market price trends].

More recently (in the last two years), there have been consignments of lower priced Q&T plate being imported from China. SSAB's observation is that this has led to stronger competition at the lower end of the market. [CONFIDENTIAL TEXT DELETED – profitability impacts]

- (b) Provide the sources of demand for the goods in Australia, including the categories of customers, users or consumers of the product.

Demand for the goods comes from a wide range of markets including steel processors, mining, trailer and body builders, raw material handling and recycling.

- (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b).

[CONFIDENTIAL TEXT DELETED – sales revenue chart]

- (d) Describe the factors that influence consumption/demand variability in Australia, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production.

Influences come from mainly the financial stability of the Australian economy e.g. government projects and interest rates etc. which then is reflected in the market as a whole.

- (e) Describe any market segmentations in Australia; such as geographic or product segmentations.

There is a geographical difference within Australia being predominantly mining in the west and heavy manufacturing in the east.

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- (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e).

**Generally speaking “west” geographical segment [CONFIDENTIAL TEXT DELETED – number]% and “east” geographical segment [CONFIDENTIAL TEXT DELETED – number]%.
It should be noted that SSAB’s customer base is overwhelmingly end users, with sales to distributors accounting for [CONFIDENTIAL TEXT DELETED – number]. This is where SSAB’s quality proposition and attention to technical support excels.**

- (g) Describe the way in which Australian manufactured and other imported goods compete in the Australian market.

Australian processed Q&T competes with other imported (non SSAB) products mainly driven by Australian distributors importing cheaper Chinese Q&T and Belgian (Russian greenfeed) Q&T product. These other imported goods devalue the lower priced commodity end of the Q&T market.

- (h) Describe the ways that the goods are marketed and distributed in the Australian market.

SSAB products are marketed on the value and consistency our brand brings to the end user’s business, through creating an easier environment in their workshop (way of working with Q&T) and increased longevity performance in the field for the ultimate owner/operator of the equipment or other fabricated product concerned.

- (i) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.

**CHAFTA for Q&T plate from China and Bisalloy’s interactions with the Chinese greenfeed and Q&T industry have created interest in the Australian market and a favourable environment for Chinese exporters. Substantial tonnages which are free from any anti-dumping duties have entered the Australian market in recent years from other countries as well.
It seems to be the case that Bisalloy’s traditional distribution network has diversified its sourcing and is now selling Chinese and Belgian Q&T steel side-by-side with Bisalloy product. SSAB believes that this has caused price confusion for Bisalloy. Bisalloy likely aspires to achieve the prices SSAB maintains but is being held-back by commodity level price competition both with, and in, its own distribution network.**

Provide documentary evidence to support the responses made to questions 1(a) to (i).

2. Provide a diagram which describes the Australian market structure for the goods, ensuring that all the categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the Australian market.

[CONFIDENTIAL TEXT DELETED – SSAB market intelligence]

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3. Describe the commercially significant market participants in the Australian market for the goods at each level of trade over the inquiry period. Include in your description:
- names of the participants
 - the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.)
 - a description of the degree of integration (either vertical or horizontal) for each market participant and
 - an estimation of the market share of each participant.

We have over [CONFIDENTIAL TEXT DELETED – number] end user customers Australia wide. All of these customers play a significant part in manufacturing and repair within the Australian market.

Consistent with SSAB AU’s end user focus, the number of distribution only customers it has number only [CONFIDENTIAL TEXT DELETED – number]. For the most part these are due to direct requests from those distributors’ own customers for supply of Hardox/Strenx brand product.

4. Identify the names of commercially significant importers in the Australian market for the goods over the inquiry period and estimate their market share. Specify the country each importer imports from and their level of trade in the Australian market, if known.

- A [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence]**
- **NISCO NM 450 – China approx. [CONFIDENTIAL TEXT DELETED – number] MT**
 - **JFE – Japan approx. [CONFIDENTIAL TEXT DELETED – number] MT**
- B [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence]**
- **NLMK – Quard 450 and Quend 700 – Russia / Belgium approx. [CONFIDENTIAL TEXT DELETED – number] MT**
 - **Leong Jin – Wear Tuff 450 and 500 – China approx. [CONFIDENTIAL TEXT DELETED – number] MT**
 - **NISCO – NM 450 – China approx. [CONFIDENTIAL TEXT DELETED – number] MT**
- C [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence]**
- **NLMK – Quard 450 and Quend 700 – Russia / Belgium approx. [CONFIDENTIAL TEXT DELETED – number] MT**
- D [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence]**
- **Chinese mill – [CONFIDENTIAL TEXT DELETED – number] MT**
- E [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence]**
- **NISCO – [CONFIDENTIAL TEXT DELETED – number] tonnes**
- F [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence]**

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- NISCO – NM 450

E [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence]

- Bisalloy Co-Operative Joint Venture with partner Shandong Steel – [CONFIDENTIAL TEXT DELETED – number] MT

5. Describe the regulatory framework of the Australian market for the goods as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.

The Australian market is relatively open and unregulated, apart of course from the dumping duties.

6. Describe any entry restrictions for new participants into the Australian market for the goods. Your response could include information on:

- resource ownership
- patents and copyrights
- licenses
- barriers to entry
- import restrictions and
- government regulations (including the effect of those government regulations).

In responding to question 6 ensure that relevant regulations are referenced.

There is no restriction for new participants to come into the Australian market, apart from, of course, if you are from Finland, Japan or Sweden, the dumping duties.

I-2 Goods in the Australian market

1. Generally describe the range of the goods offered for sale in the Australian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:

- quality differences
- price differences
- supply/availability differences
- technical support differences
- the prevalence of private labels/customer brands
- the prevalence of generic or plain labels
- the prevalence of premium labels and

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- product segmentation.

Quenched and tempered steel plate of various specifications. SSAB brands Hardox and Strenx recognised as premium labels.

2. Describe the end uses of the goods in the Australian market from all sources.

The end users are in these industries: heavy transport, mining, recycling, refuse collection, forestry, agriculture, defence and construction.

3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Australian market. Rank these preferences or purchasing influencers in order of importance.

So far as SSAB is concerned, the key product attributes are quality, consistency and performance of the product in the workshop and in the field. Customers that purchase Q&T would recognise these as key attributes as well, but do not necessarily make their buying decision on that basis.

4. Identify if there are any commercially significant market substitutes in the Australian market for the goods.

Some applications can be substituted by mild steel, cast iron, aluminium, overlay products, etc. However in the key applications that are suited to advanced steels it is unlikely to find inferior steels (less suitable for the task).

5. Identify if there are any commercially significant market complements in the Australian market for the goods.

There are none.

6. Have there been any changes in market or consumer preferences in the Australian market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

[CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence] Hardox/Strenx in the Australian market to achieve a quality end user product.

I-3 Relationship between price and cost in Australia

1. Describe the importance of the Australian market to your company's operations. In your response

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describe:

- (a) the proportion of your company's sales revenue derived from sales of the goods in Australia, and
- (b) the proportion of your company's profit derived from sales of the goods in Australia.

In responding to question 1, please provide evidence supporting your calculations.

The Australian market is very important to SSAB EMEA but above all, more important to its customers. The Australian customers who use SSAB premium Q&T products, are the customers who appreciate the unique quality offering they receive from SSAB's product [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence].

Regarding SSAB's sales revenue through sales to SSAB AU, please refer to our answer to question H-3.1(b) above.

2. Is your organisation/business entity the price leader for the goods in the Australian market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

SSAB believes it leads the price and quality. [CONFIDENTIAL TEXT DELETED – SSAB AU market intelligence]

3. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Australia. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

The price strategy for SSAB Australia is based on a solution selling pricing approach. [CONFIDENTIAL TEXT DELETED – SSAB AU price setting practices]. SSAB tolerances set us apart from other QT plate manufacturers. Our product provides workshop efficiencies and product longevity advantages which creates cost savings in the field.

4. Explain the process for how the selling prices of the goods for the Australian market by your business are determined. Provide copies of internal documents which support how pricing is determined.

[CONFIDENTIAL TEXT DELETED – SSAB AU price setting practices]

5. How frequently are your Australian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.

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[CONFIDENTIAL TEXT DELETED – SSAB AU price setting practices]

6. Rank the following factors in terms of their influence on your pricing decisions in the Australian market, with the most important factor ranked first and the least important factor ranked last:

- Competitors' prices
- Purchase price of raw materials
- Cost to make and sell the goods
- Level of inventory
- Value of the order
- Volume of the order
- Value of forward orders
- Volume of forward orders
- Customer relationship management
- Supplier relationship management
- Desired profit
- Brand attributes
- Other [please define what this factor is in your response]

- **Cost to make and sell the goods**
- **Purchase price of raw materials**
- **Logistics cost to Australia**
- **Brand attributes**
- **Desired profit**
- **Level of competitors inventory in the market**
- **Value of the order**
- **Supplier relationship management**
- **All other factors are decided by the local Australian sales team who sell to their customers.**

7. Describe the relationship between selling price and costs to make and sell in the Australian market. Does your company maintain a desired profit margin for the goods? If not, does your company seek to maintain a desired profit margin for the goods? Provide copies of internal documents which support your response to this question.

Pricing is foremost done from a value and market perspective since the offering is niched to special steels.

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8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

[CONFIDENTIAL TEXT DELETED – information about price reductions]

9. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.

[CONFIDENTIAL TEXT DELETED – information about bundled pricing]

10. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume-based prices for the goods. Provide copies of internal documents which support your claims in response to this question.

Yes, could be on individual order, but it is the customer's total demand and our position as main supplier that are the most decisive points in this aspect. We are not amenable to suddenly low price offers for customers that are not pre-existing customers, it badly impacts on sense of loyalty/relationship with existing large volume customers. [CONFIDENTIAL TEXT DELETED – SSAB market intelligence]

11. Does your organisation/business entity use sales contracts in the Australian market? If yes:
- What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
 - Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
 - How frequently are sales contracts renegotiated?
 - How frequently are price reviews conducted between contracts?
 - Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
 - Do changes in your costs to make and sell enable you to review prices for customers within contracts?
 - Provide a list of the customers under contract during the inquiry period and copies of the two largest contracts in terms of sales revenue.

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[CONFIDENTIAL TEXT DELETED – SSAB AU sales practices]

12. Provide copies of any price lists for the goods used in the Australian market during the inquiry period. If you do not use price lists, describe the transparency of your prices in the Australian market.

[CONFIDENTIAL TEXT DELETED – price setting practices] Pricing lacks transparency although feedback from customers is useful. Through that conduit SSAB is aware that Bisalloy is routinely and significantly cheaper than SSAB. In no case in the inquiry period has it been suggested to SSAB that it is lower priced than Bisalloy. [CONFIDENTIAL TEXT DELETED – SSAB AU pricing policy]

13. How do you differentiate pricing for different products/models of the goods in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost (including selling cost) differences between different products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.

[CONFIDENTIAL TEXT DELETED – SSAB AU price setting practices] higher steel grades are more complicated to produce and therefore come with higher prices.

14. Do you tier or segment your Australian customers for the goods in terms of pricing? If yes, provide:
- a general description of how this is done
 - list the factors that influence pricing differentiation in different tiers or segments, and
 - explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

Provide copies of internal documents which support your claims in response to this question.

- Value for the customer vs other material
- Customer relationship / loyalty
- Customer volume for the period
- Market price development
- Competitor pricing

15. Do you sell the goods to related entities in Australia? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide copies of any internal documents relevant to establishing pricing to related parties.

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G&G Mining Fabrication Pty Ltd was a 100% owned subsidiary of SSAB EMEA up until 28 June 2023. Their prices always have been decided in exactly the same way as SSAB AU decides on its prices to unrelated customers.

I-4 Marketing and sales support in the Australian market

1. How does your company market the goods in the Australian market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).

- **Superior quality e.g. tight tolerances in flatness, workability, etc.**
- **Guaranteed toughness**
- **Workshop friendly**
- **Reliability**
- **Sustainability**
- **Physical brochures**
- **Web pages**
- **Social media**
- **Exhibitions**

2. Does your company conduct brand segmentation in the Australian market for the goods? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.

Yes, Hardox and Strenx premium brands.

3. Provide examples of your Australian advertising of the goods over the past five years. If you have not used advertising in Australia, provide examples of any other promotion campaigns you have conducted over the inquiry period.

Please refer to Attachment I-4.3 - SSAB AU advertising material.

4. How many people are in your Australian sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

There are [CONFIDENTIAL TEXT DELETED – number] members of the in-country sales team, as follows:

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[CONFIDENTIAL TEXT DELETED – information about staffing]

[CONFIDENTIAL TEXT DELETED – information about remuneration]

5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.

Please refer to:

- **Attachment I-4.5(1) – SSAB AU internal price guide – June 2023**
[CONFIDENTIAL ATTACHMENT]
- **Attachment I-4.5(1) – SSAB AU internal price guide – September 2023**
[CONFIDENTIAL ATTACHMENT]

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EXPORTER'S DECLARATION

I hereby declare that SSAB EMEA AB has 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

Christopher Ramsten



Signature

Position

Head of Finance / CFO Special Steels and SSAB EMEA AB

Date

14/02/2024

APPENDIX GLOSSARY OF TERMS

This glossary is intended to provide you with a basic understanding of technical terms that appear in the questionnaire.

Adjustments

To enable a fair comparison between the export price and the normal value Australian legislation provides for the adjustment of the domestic price paid for like goods. Adjustments are made to account for sales occurring at different times, specification differences, and differences in the terms or circumstances of the sales. The adjustment to the normal value may be upward or downward. Areas where you believe an adjustment is necessary should be identified. Section E of the questionnaire refers.

Examples of adjustments that may be made include: *sales occurring at different times* (it is sometimes necessary to compare domestic and export sales made at different times - in these circumstances an adjustment may be made to reflect price movements during that time); *specification differences*; *packaging*; *taxes*; *level of trade*; *advertising*; *after sales services*; *inland freight*; *warehousing*; *export charges*; *credit terms*; *duty drawback*; *commissions*.

Adjustments may also be required where the normal value is based on costs to make and sell.

Arms length

Sales are not considered to be at "arms length" on your domestic market if there is any consideration payable for the goods other than their price, or there is an association between the buyer and the seller which affects the price, or there will be a reimbursement, compensation or benefit for, or in respect of, the price.

Constructed value

In cases where prices paid for like goods sold in the country of export cannot be used for the determination of normal value, i.e. when there are no or insufficient sales or where such sales were not made in the ordinary course of trade, normal value may be based on a constructed value. Constructed value is calculated on the basis of the cost of production of the goods under consideration plus a reasonable amount for selling, general and administration costs, and for profits, that are associated with sales on the domestic market of the country of export.

Cost of production/manufacturing

The cost of production or manufacture consists of all manufacturing costs associated with the goods. It is the sum of direct materials, direct labour and factory overheads.

Cost to make and sell

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general

and administration costs associated with the sale of those goods.

Country of origin

The country in which the last significant process in the manufacture or production of the goods was performed.

Date of sale

The Commission will normally use the invoice date as recorded in the exporter or producer's records. Another date may be used if this better reflects the material terms of sale. The questionnaire directs attention to matching data sets of domestic and export sales where some other date is used, as well as matching cost information.

Direct labour cost

Direct labour is categorised as a variable cost, i.e. the value varies with the level of production.

Dumping

Dumping occurs when the products of one country are exported to another country at a price less than their normal value.

Dumping margin

Where the export price is less than the normal value the dumping margin is the amount of the difference. It can be expressed as a value or as a percentage of the export price.

Export price

The export price of the goods is usually the price paid or payable to the exporter in arms length transactions, in most instances calculated at the Free on Board (FOB) level.

Exporting country

The country of export is normally the country of origin from which the goods are shipped. The country of export may be an intermediate country, except where the products are merely transhipped through that country, or the products concerned are not produced in that country, and there is no comparable price in that country.

Factory overheads

Factory overheads consist of variable costs e.g. power, supplies, indirect labour and fixed costs e.g. factory rent, factory insurance, factory depreciation etc.

Goods under consideration (the goods)

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The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

The following abbreviations are commonly used (comment is provided concerning costs that are normally borne by the seller):

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the sellers premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required)
FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc. payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance) (the terms CFR and CIF are only used where goods are carried by sea or waterway transport)
CPT	carriage paid to
CIP	carriage and insurance paid to the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried by air, road, rail etc.
DAF	delivered at frontier (goods carried by rail or road and cleared for export at the named place at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer's disposal)
DES	delivered ex ship (goods made available to the buyer on board the ship uncleared for import at the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc. incurred upon importation)

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The period

A period defined by the Commission over which importations of the goods are examined.

Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods or that, although not alike in all respects have characteristics closely resembling those of the goods. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

Normal value

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based on all costs to make and sell the goods, and an amount for profit. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, the Commission will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

Where domestic price generally, and the trade of the exporting country are determined or substantially influenced by the government of the exporting country, an alternative/surrogate market economy is selected by the Commission and the normal value is determined as if the surrogate country were the export source.

Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be constructed from costs to make and sell.

Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- domestic sales of like goods
- sale of goods of the same general category by the exporter or
- sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director's fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.