



Australian Government  
Department of Industry,  
Science and Resources

# Anti-Dumping Commission

## Exporter Questionnaire

**Case number:** 694

**Product:** Zinc coated (galvanised) steel

**From:** People's Republic of China

**Inquiry period:** 1 October 2024 to 30 September 2025 (the period)

**Response due by:** 19 January 2026

**Email enquiries to:** [investigations@adcommission.gov.au](mailto:investigations@adcommission.gov.au)

**Anti-Dumping Commission website:** [www.adcommission.gov.au](http://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.**

## TABLE OF CONTENTS

<b>TABLE OF CONTENTS .....</b>	<b>2</b>
<b>INSTRUCTIONS.....</b>	<b>4</b>
<b>CHECKLIST.....</b>	<b>7</b>
<b>GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES .....</b>	<b>9</b>
<b>SECTION A COMPANY INFORMATION .....</b>	<b>11</b>
A-1    COMPANY REPRESENTATIVE AND LOCATION .....	11
A-2    COMPANY INFORMATION .....	11
A-3    GENERAL ACCOUNTING INFORMATION .....	13
A-4    FINANCIAL DOCUMENTS .....	14
<b>SECTION B EXPORT SALES TO AUSTRALIA.....</b>	<b>16</b>
B-1    AUSTRALIAN EXPORT SALES PROCESS .....	16
B-2    AUSTRALIAN SALES LISTING .....	17
B-3    SAMPLE EXPORT DOCUMENTS .....	17
B-4    RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS .....	17
<b>SECTION C EXPORTED GOODS &amp; LIKE GOODS .....</b>	<b>19</b>
C-1    MODELS EXPORTED TO AUSTRALIA .....	19
C-2    MODELS SOLD IN THE DOMESTIC MARKET .....	19
C-3    INTERNAL PRODUCT CODES .....	19
<b>SECTION D DOMESTIC SALES.....</b>	<b>21</b>
D-1    DOMESTIC SALES PROCESS.....	21
D-2    DOMESTIC SALES LISTING .....	22
D-3    SAMPLE DOMESTIC SALES DOCUMENTS .....	22
D-4    RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS .....	23
<b>SECTION E DUE ALLOWANCE .....</b>	<b>24</b>
E-1    CREDIT EXPENSE .....	24
E-2    PACKAGING .....	25
E-3    DELIVERY.....	25
E-4    OTHER DIRECT SELLING EXPENSES .....	26
E-5    OTHER ADJUSTMENT CLAIMS .....	27
<b>SECTION F THIRD COUNTRY SALES.....</b>	<b>28</b>
F-1    THIRD COUNTRY SALES PROCESS .....	28
F-2    THIRD COUNTRY SALES LISTING .....	28
F-3    DIFFERENCES IN SALES TO THIRD COUNTRIES .....	29
<b>SECTION G COST TO MAKE AND SELL.....</b>	<b>30</b>
G-1    PRODUCTION PROCESS .....	30
G-2    COST ACCOUNTING PRACTICES.....	30
G-3    COST TO MAKE ON DOMESTIC MARKET .....	31
G-4    SELLING, GENERAL & ADMINISTRATIVE EXPENSES.....	32
G-5    COST TO MAKE THE GOODS EXPORTED TO AUSTRALIA.....	33
G-6    COST ALLOCATION METHOD .....	33
G-7    MAJOR RAW MATERIAL COSTS .....	34
G-8    RECONCILIATION OF COST TO MAKE TO AUDITED FINANCIAL STATEMENTS .....	35
G-9    PRODUCTION OF THE GOODS UNDER CONSIDERATION .....	36
<b>SECTION I COUNTERVAILING .....</b>	<b>37</b>
I-1    GENERAL .....	38
I-2    PROVISION OF GOODS AT LESS THAN ADEQUATE REMUNERATION .....	38
I-3    PREFERENTIAL TAX POLICIES.....	39
I-4    FINANCIAL GRANTS.....	40

I-5	OTHER PROGRAMS .....	41
J-4	MARKETING AND SALES SUPPORT IN THE DOMESTIC MARKET .....	47
<b>EXPORTER'S DECLARATION .....</b>		<b>48</b>
<b>APPENDIX GLOSSARY OF TERMS .....</b>		<b>49</b>

## INSTRUCTIONS

### Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting an accelerated review into Zinc coated (galvanised) steel exported to Australia from People's Republic of China.

The commission will use the information you provide to determine normal values and export prices over the review period (the period). This information will determine whether Zinc coated (galvanised) steel is dumped. The commission will also use this information to determine whether Zinc coated (galvanised) steel has been in receipt of countervailable subsidies over the period.

The Commission will collect and use information in accordance with its [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.

### 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 and a subsidy 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 exporter 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. A request for extension will be rejected if 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 period and not only 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
- 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 in 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:

[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 questionnaire. 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 conduct a verification of 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 on 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 and subsidy margin. The commission considers that the dumping margin and subsidy margin are 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.
- 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.

## 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	<input checked="" type="checkbox"/>
Section B Export sales to Australia	<input checked="" type="checkbox"/>
Section C Exported goods & like goods	<input checked="" type="checkbox"/>
Section D Domestic sales	<input checked="" type="checkbox"/>
Section E Due allowance	<input checked="" type="checkbox"/>
Section F Third country sales	<input checked="" type="checkbox"/>
Section G Cost to make and sell	<input checked="" type="checkbox"/>
Section I Countervailing	<input checked="" type="checkbox"/>
Exporter's declaration	<input checked="" type="checkbox"/>
Non-confidential version of this response	<input checked="" type="checkbox"/>

Attachments	Please tick if you have provided spreadsheet	
B-2 Australian sales	<input type="checkbox"/>	not applicable
B-2.2 Australian sales source	<input type="checkbox"/>	not applicable
B-4 Upwards sales	<input checked="" type="checkbox"/>	
D-2 Domestic sales	<input checked="" type="checkbox"/>	
D-2.2 domestic sales source	<input checked="" type="checkbox"/>	
F-2 Third country sales	<input checked="" type="checkbox"/>	
F-2.2 third country sale source	<input checked="" type="checkbox"/>	
G-3 Domestic CTM	<input checked="" type="checkbox"/>	
G-3.2 domestic CTM source	<input checked="" type="checkbox"/>	
G-4.1 SG&A listing	<input checked="" type="checkbox"/>	
G-4.2 Dom SG&A calculation	<input checked="" type="checkbox"/>	
G-4.3 Upwards SG&A	<input checked="" type="checkbox"/>	
G-5 Australian CTM	<input type="checkbox"/>	not applicable
G-5.2 Australian CTM source	<input type="checkbox"/>	not applicable
G-7.2 Raw material CTM	<input checked="" type="checkbox"/>	
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>	

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G-8 Upwards costs	<input checked="" type="checkbox"/>	
I-1 Company Turnover	<input checked="" type="checkbox"/>	
I-2 Raw Material Purchases (if required)	<input type="checkbox"/>	not required
I-3 Income Tax	<input checked="" type="checkbox"/>	
I-4 Grants	<input checked="" type="checkbox"/>	

## GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

*Flat rolled products of iron and non-alloy steel of a width less than 600mm and equal to or greater than 600mm, plated or coated with zinc;  
and Flat rolled products of alloyed steel of a width less than 600mm and equal to or greater than 600mm, plated or coated with zinc exported from:  
- China by Angang Steel Co., Ltd or Benxi Iron and Steel (Group) International Economic & Trading Co.; or - Taiwan by Yieh Phui Enterprise Co., Ltd.*

Further information in regard to the goods is available in Anti Dumping Notice 2023/035, which is available on the electronic record for this case.

### Model Control Code

Details of the model control code (MCC) structure for the goods are detailed in the table below. 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
1	Alloy content	Alloy	A	Mandatory	Not applicable
		Non-alloy	NA		
2	Prime	Prime	P	Mandatory	Not applicable
		Non – Prime	N		
3	Steel Base	Hot Rolled	H	Mandatory	Mandatory
		Cold Rolled	C		
4	Coating Type	Zinc Coated (Z)	Z	Mandatory	Mandatory
		Zinc / Iron Alloy Coating (ZF / F)	F		
5	Coating Mass	$\leq 100 \text{ g/m}^2$	1	Mandatory	Mandatory
		$>100 \text{ g/m}^2$ to $\leq 220 \text{ g/m}^2$	2		
		$> 220 \text{ g/m}^2$ to $\leq 300\text{g/m}^2$	3		
		$>Z300 \text{ g/m}^2$ to $\leq 400 \text{ g/m}^2$	4		
		$>400 \text{ g/m}^2$	5		
6	Steel Grade	G2 / SGCC / SGHC	A	Mandatory	Mandatory
		G3 / SGCD	B		
		G250 / SGC 340 / SGHC 340 / SGC 340 / SGHC 340	C		
		G300 / G350 / SGC 400 / SGHC 400 / SGC 440 / SGCH 440 / SGC 490 / SGHC 490	D		
		G450 / G500	E		
		G550 / SGC 570	F		
		Other	G		
7	Base Metal	$< 0.40 \text{ mm}$	1	Mandatory	Mandatory
		$\Rightarrow 0.40 \text{ mm}$ to $< 0.50 \text{ mm}$	2		
		$\Rightarrow 0.50 \text{ mm}$ to $< 0.75 \text{ mm}$	3		

PUBLIC RECORD

	Thickness (BMT)	=> 0.75 mm to < 1.00 mm	4		
		=> 1.00 mm to < 1.50 mm	5		
		=> 1.50 mm to < 2.00 mm	6		
		=> 2.00 mm to <2.50 mm	7		
		=> 2.50 mm	8		
8	Width	< 600 mm	A	Mandatory	Optional
		=> 600 mm to <= 1220mm	B		
		> 1220mm	C		
9	Form	Coil	C	Mandatory	Optional
		Sheet	S	Mandatory	Optional

In constructing a MCC, use a "-" between each category. For example: A-P-H-Z-3-A-1-A-C

The MCCs will be used to match export models to the 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 MCC may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

If there are models manufactured and sold by your company that do not align within 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.

## SECTION A COMPANY INFORMATION

### A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: [Jenny Tan](#)  
Position in the company: [Manager](#)  
Telephone: [\[Sensitive: telephone number of Jenny\]](#)  
E-mail address: [tanzhenli@haoyusteel.com](mailto:tanzhenli@haoyusteel.com)

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

#### [Australian representative](#)

Name: [J.Bracic&Associates Pty Ltd](#)  
[Mr. John Bracic](#)  
Address: [PO Box 3026, Manuka, ACT 2603](#)  
Telephone: [+61 499 056 729](#)  
E-mail address: [john@jbracic.com.au](mailto:john@jbracic.com.au)

#### [Chinese representative](#)

Name: [Beijing Dacheng Law Offices, LLP \(Chongqing\)](#)  
[Ms. Yang Xiaolin](#)  
Address: [27/F,28/F,29/F Tower A Guohua Financial Center NO.9 Juxianyan Plaza Jiangbeizui, Jiangbei District, Chongqing, China](#)  
Telephone: [+86 13637983487](#)  
E-mail address: [xiaolin.yang@dentons.cn](mailto:xiaolin.yang@dentons.cn)

*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 the where your company's financial records are held.

#### **RESPONSE:**

[The financial records are held in the financial department of Tianjin Xinyu Color Plate Co., Ltd.](#)

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

#### **RESPONSE:**

[The production records are held in the production department of Tianjin Xinyu Color Plate Co., Ltd.](#)

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

#### **RESPONSE:**

[The location is Nanhe Industrial Park, Xiqing Economic Development Zone, Tianjin City, China.](#)

### A-2 Company information

1. What is the legal name of your business?

#### **RESPONSE:**

[Legal name of our business is Tianjin Xinyu Color Plate Co., Ltd.](#) (in Chinese: [天津市新宇彩板有限公司](#)) (hereinafter also referred to as "Xinyu" or "the Company").

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

**RESPONSE:**

Yes, The Company has two registered trademarks (brand): (1) Xinyu; (2) Tianyu. For details of the brands, please refer to Exhibit A-2.11 Brochure.

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

**RESPONSE:**

No, Xinyu doesn't have any different legal or trading name.

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

**RESPONSE:**

Xinyu doesn't have a board of directors, [Sensitive: director's name].

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

If yes, provide:

- (a) A diagram showing the complete ownership structure and
- (b) A list of all related companies and its functions

**RESPONSE:**

No, the Company is not part of a group.

Please see [Exhibit A-2.5\(a\)](#) for the diagram showing the complete ownership structure.

Please see [Exhibit A-2.5\(b\)](#) for the list of all related companies and its functions.

6. Is your company or parent company publicly listed?

**RESPONSE:**

No, the Company is not publicly listed.

If yes, please provide:

- (c) The stock exchange where it is listed and
- (d) Any principal shareholders<sup>1</sup>

If no, please provide:

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

**RESPONSE:**

A list of all shareholders and the shareholding percentages are as follows:  
[Sensitive: shareholders and the shareholding percentages].

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.

**RESPONSE:**

Xinyu is a steel product manufacturer. Xinyu mainly produces and sells three types of goods:

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<sup>1</sup> 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.

- (1) Cold-rolled steel.
- (2) All galvanized products, which is flat rolled steel coated with zinc, including galvanized steel within scope of GUC and others such as aluminized zinc steel, magnesium-aluminium-zinc alloy steel. It is collectively taken as "all galvanized products".
- (3) Color plate, which is further produced from galvanized steel.

The products are sold to both domestic and third countries.

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.

**RESPONSE:**

Xinyu only performs function (a) and (b), manufacture goods and sell in the domestic market.

Function (c) and (d) are performed by [Sensitive: the company performing function (c) and (d)].

9. Provide your company's internal organisation chart.

**RESPONSE:**

Please see [Exhibit A-2.9](#) for the Company's internal organisation chart.

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

**RESPONSE:**

Please see [Exhibit A-2.10](#) for the functions performed by each group within the organisation.

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

**RESPONSE:**

Please see [Exhibit A-2.11](#) for the brochures of Xinyu.

### **A-3 General accounting information**

1. What is your financial accounting period?

**RESPONSE:**

Xinyu's financial accounting period is from January 1st to December 31st.

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

**RESPONSE:**

Yes, Xinyu's financial accounts are audited. The auditors are from TianJinShi XiDi Limited liability Certified Public Accountants. For the latest audit report year 2024 the auditors are Liu Zhaojun and Gao Wenlong.

3. What currency are your accounts kept in?

**RESPONSE:**

Xinyu's accounts are kept in Chinese yuan (CNY/RMB).

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

**RESPONSE:**

The name of financial accounting system is [Sensitive: financial accounting system's name].

5. What is the name of your sales system?

**RESPONSE:**

The name of sales system is [Sensitive: sales system's name].

6. What is the name of your production system?

**RESPONSE:**

Xinyu doesn't have production system and uses manual bookkeeping.

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.

**RESPONSE:**

The Company uses manual bookkeeping and the systems interact through manual.

[Sensitive: the details of how the systems interact].

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

**RESPONSE:**

No, the accounting practices of Xinyu are consistent with the generally accepted accounting principles in China.

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

**RESPONSE:**

No, there haven't been any changes over the last two years.

## **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.

**RESPONSE:**

Please see [Exhibit A-4.1](#) for the Audit reports for the last two financial years.

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.

**RESPONSE:**

The auditors don't provide the audit management letters for Xinyu company.

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.

**RESPONSE:**

This question is not applicable since the financial statements were audited.

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

**RESPONSE:**

No. Xinyu does not maintain different profit centres.

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

**RESPONSE:**

Please see [Exhibit A-4.5](#) for the income statement directly from the Company's accounting information system covering the most recent period and the period.

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

**RESPONSE:**

Please see [Exhibit A-4.6](#) for the Company's trial balance covering the period and the most recent financial year.

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

**RESPONSE:**

Please see [Exhibit A-4.7](#) for the chart of accounts.

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

## SECTION B EXPORT SALES TO AUSTRALIA

### RESPONSE:

B-1, B-2 and B-3 in this section is not applicable since the Company doesn't have any export sales to Australia during the period. Response to B-4 is provided to complete sales reconciliation.

### 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
  
2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:
  - (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?
  
3. Are there any customers of the goods exported to Australia related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.
  
4. If sales are in accordance with price lists or price extras list, provide copies of these lists.
  
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.
  
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, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount and/or rebate.
  
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.
  
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:
  - (a) Are you claiming a date other than the invoice date as the date of sale?
  - (b) If you are claiming a date other than the invoice date as the date of sale, why does this date better reflect the material terms of sale? Provide evidence to support your claim. 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.

Note that any date of sale claim, other than the invoice date, that is made after submitting a response to this questionnaire may not provide the commission with sufficient time to assess the claim and may not be considered.

9. Were there any factors outside of your control which affected your ability to export the goods to Australia during the review period? If yes, provide details of these factors and how they affected your patterns of trade over the review period.

## 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.
  - This worksheet must also include exports of the goods that have been exempted from anti-dumping duties under 8(7) and section 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975*<sup>2</sup>.
  - 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 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.
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".

## 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, remittance advice 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 & marine insurance (if applicable)
  - Country of origin certificates (if applicable)

*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 "B-2 Australian sales" listing to the source documents in B-3.1.

## 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.

### RESPONSE:

Please see [Worksheet B-4 Upwards sales](#).

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<sup>2</sup> ADN [2023/35](#)

2. Please provide all source documents & worksheets, other than those in A-4, B-2 and D-2, required to complete the “B-4 Upwards sales” worksheet.
  - For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:
    - Sales of the goods under consideration and other sales (e.g. non-goods or services)
    - Domestic, Australian and third country sales of the goods under consideration
  - If the documents include spreadsheets, all formulas used must be retained
  - There must not be any balancing amounts. All amounts must be supported by source documents.

**RESPONSE:**

Please see [Exhibit B-4.2](#) for all sales reconciliation source documents & worksheets as requested.

3. For all amounts 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.

**RESPONSE:**

Please see [Worksheet B-4 Upwards sales](#) and [Exhibit B-4.2](#) as requested.

## 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.

### 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.

#### RESPONSE:

This question is not applicable since the Company doesn't have any export sales to Australia.

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.

#### RESPONSE:

This question is not applicable since the Company doesn't have any export sales to Australia.

### 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.

#### RESPONSE:

The Company produced and sold galvanized products in the domestic market. Specifications such as steel grade, thickness and width, zinc mass is character of identifying the like goods.

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.

#### RESPONSE:

Please refer to [Exhibit C-2.2 MCCs sold on domestic market](#).

### C-3 Internal product codes

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

If yes:

- (a) 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.
- (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.
- (c) Provide a table of showing the product or SKU codes for each MCC.

If no:

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

**RESPONSE:**

The Company does not use such product codes.

## SECTION D DOMESTIC SALES

If your company did not sell like goods on the domestic market during the review period, please contact the commission as soon as possible. You may be required to complete this section (and G-3) as it relates to export sales to third countries. You may also be asked other supplementary questions. Extensions will not be granted as a result of delays in contacting the commission in this regard.

### 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

**RESPONSE:**

Please see [Exhibit D-1.1](#) for the Domestic sales process.

2. Are any domestic 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.

**RESPONSE:**

No.

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

**RESPONSE:**

The company does not have price lists. [Sensitive: how is the price determined.]

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.

**RESPONSE:**

No, the domestic selling prices are all determined with same considerations, no matter for the distributors or the end-users.

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.

**RESPONSE:**

No. Xinyu did not provide any discount or rebate to domestic customers.

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.

**RESPONSE:**

No. Xinyu did not issue any credit or debit notes to domestic customers.

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:
- (a) Are you claiming a date other than the invoice date as the date of sale?
  - (b) If you are claiming a date other than the invoice date as the date of sale, why does this date best reflect the material terms of sale? Provide evidence to support your claim. 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.

**RESPONSE:**

The Company adopts the date of invoice as the sales date.

Note that any date of sale claim, other than the invoice date, that is made after submitting a response to this questionnaire may not provide the commission with sufficient time to assess the claim and may not be considered.

## 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.

**RESPONSE:**

Please see [Worksheet D-2 Domestic sales.](#)

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".

**RESPONSE:**

Please see [Worksheet D-2.2 Domestic sales source.](#)

## D-3 Sample domestic sales 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, remittance advice and accounts receivable ledger
  - Documents showing bank charges

- Delivery invoices

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

**RESPONSE:**

Please see [Exhibit D-3.1](#) for the two largest invoices along with relevant documentation in domestic sales samples.

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.

**RESPONSE:**

All documents have been annotated as requested.

## **D-4 Reconciliation of sales to financial accounts**

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

**RESPONSE:**

The Company has completed B-4.

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 and worksheets, 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.
  - For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:
    - Sales of the goods under consideration and other sales (e.g. non-goods or services)
    - Domestic and third country sales of the goods under consideration
  - If the documents include spreadsheets, all formulas used must be retained
  - There must not be any balancing amounts. All amounts must be supported by source documents.
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.

## SECTION E DUE ALLOWANCE

### E-1 Credit expense

1. For each Australian customer of the goods and each domestic customer of like goods, calculate the average credit period for that customer by:
  - Calculating the average accounts receivable over the period for that customer.
    - This is usually calculated by summing the average monthly accounts receivable (opening plus closing divided by 2) over the period and dividing it by 12.
    - If there is a more accurate way of calculating the average accounts receivable (e.g. the customer only made purchases in certain months) then use an alternative method.
  - Calculating the accounts receivable turnover over the period for that customer using the formula:

$$\frac{\text{Net sales revenue over the peirod}}{\text{Average accounts receivable}}$$

- Calculating the average credit period for that customer using the formula:

$$\frac{365}{\text{Accounts receivable turnover}}$$

#### RESPONSE:

All domestic customers paid fully before delivery. The Company recognizes and records revenue upon invoice and the invoice is issued to customers after goods delivery. Thus, all payment of goods is recorded in account "advance from customer" (code 2131).

Please refer to [Exhibit E-1.1](#), in which we provided ledger "advance from customer" for each domestic customer during the period. It indicated that there is always no balance or balance in credit, which means all domestic customers has paid fully before delivery and invoice issuing. So, no credit period is granted to domestic customers, and no credit expense shall be used as allowance.

Xinyu doesn't have any Australian customers.

2. 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?

#### RESPONSE:

Yes, Xinyu has short term borrowings in RMB currency. The average interest rate is [Sensitive: the average interest rate].

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

#### RESPONSE:

Yes, Xinyul only holds [Sensitive: type of deposit]. The average interest rate is [Sensitive: the average interest rate].

4. If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):
  - (a) 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?
  - (b) Do you have any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

#### RESPONSE:

This question is not applicable since the Company doesn't have any Australian customers.

## E-2 Packaging

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

### RESPONSE:

The packaging used for domestic sales are mainly [Sensitive: package used for domestic sales of goods], depending on the specific requirement of the customers.

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

### RESPONSE:

This question is not applicable since the Company doesn't have export sales to Australia.

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

### RESPONSE:

This question is not applicable since the Company doesn't have export sales to Australia.

## 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?

### RESPONSE:

Yes, the domestic sales of like goods delivered to the customers [Sensitive: means of delivery].

Please see [Exhibit E-3](#) for the transportation agreements with the transportation companies.

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

### RESPONSE:

This questions E-3.2 to E-3.7 are not applicable since the Company doesn't have export sales to Australia.

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?

### RESPONSE:

This question is not applicable since the Company doesn't have export sales to Australia.

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?

### RESPONSE:

This question is not applicable since the Company doesn't have export sales to Australia.

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?

**RESPONSE:**

This question is not applicable since the Company doesn't have export sales to Australia.

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?

**RESPONSE:**

This question is not applicable since the Company doesn't have export sales to Australia.

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?

**RESPONSE:**

This question is not applicable since the Company doesn't have export sales to Australia.

#### **E-4 Other direct selling expenses**

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

**RESPONSE:**

No, the Company did not provide commissions for domestic sales of like goods or export sales of the goods.

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

**RESPONSE:**

- What is the rate of value-added tax (VAT) on sales of the goods and like goods?  
The VAT rate is 13%.
- How is VAT accounted for in your records in relation to sales of the goods and like goods?  
The financial department records the VAT according to the VAT invoices.
- Do you receive a VAT refund in relation to sales of the goods and/or like goods?  
No, the Company doesn't receive a VAT refund.
- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?  
No, the Company doesn't receive a remission or drawback.

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

**RESPONSE:**

No, all direct selling expenses are already reported in Worksheet D-2.

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

**RESPONSE:**

This question is not applicable since the Company doesn't have export sales to Australia.

**E-5 Other adjustment claims**

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 and supporting documentation.
  - 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)*<sup>3</sup> for more information.

**RESPONSE:**

No. Xinyu doesn't have any other adjustments.

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<sup>3</sup> Available on the commission 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.

#### RESPONSE:

No, there are no differences.

The sales process to the third country is as follows:

[Sensitive: sales process to the third country].

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.

#### RESPONSE:

No. Xinyu does not have related third country customers.

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 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.

#### RESPONSE:

The Company adopts the date of invoice as the sales date.

### 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.

#### RESPONSE:

Please see [Worksheet F-2 Third country sales](#).

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".

**RESPONSE:**

Please see [Worksheet F-2.2 third country sales source.](#)

**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.

**RESPONSE:**

This question is not applicable since the Company doesn't have export sales to Australia.

## 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.

#### RESPONSE:

Please see [Exhibit G-1.1](#) for the production process with the detailed description.

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.

#### RESPONSE:

No, Xinyu doesn't have any related suppliers.

### G-2 Cost accounting practices

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

#### RESPONSE:

The Company's cost accounting system is based on actual 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?
  - (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
  - (c) How were those variances allocated?
  - (d) Provide details of any significant or unusual cost variances that occurred during the period.

#### RESPONSE:

This question is not applicable since the Company uses actual costs.

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

#### RESPONSE:

The Company adopts process costing. The Company has vertical production ability starting from hot-rolled steel: hot-rolled coil (HRC) – pickled coil – cold-rolled coil (CRC) – galvanized steel – color plate.

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.

#### RESPONSE:

Yes. Xinyu has two cost centres.

(1) All galvanized products, which are flat rolled steel coated with zinc, including galvanized steel within scope of GUC and others such as aluminized zinc steel, magnesium-aluminium-zinc alloy steel. It is collectively taken as "all galvanized products".

(2) Color plate, which is further produced from galvanized steel.  
For description of each cost centre and the allocation methodology used, please refer to Exhibit G-8.2.

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

**RESPONSE:**

The Company measures cost to level of product type and specification.

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

**RESPONSE:**

No, there is no difference.

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.  
(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.

**RESPONSE:**

No, Xinyu doesn't engage in any 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)?

**RESPONSE:**

Xinyu adopts weighted average method for raw material, work-in-progress, and finished goods inventories.

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

**RESPONSE:**

There are no sub-standard goods of Xinyu's production. Same as damaged goods, sub-standard goods will be sold as scrap, and this sales income are recorded as other operating income.

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

**RESPONSE:**

There are no by products, or joint products generated from Xinyu's production. The scrap is sold at market price.

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

**RESPONSE:**

No, Xinyu doesn't receive any management fees or corporate allocations.

### **G-3 Cost to make on domestic market**

1. 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.
- 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.

**RESPONSE:**

Please see [Worksheet G-3 Domestic CTM](#).

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".

**RESPONSE:**

Please see [Worksheet G-3.2 domestic CTM source](#).

## **G-4 Selling, General & Administrative expenses**

1. Complete the worksheet named "G-4.1 SG&A listing".
  - This worksheet lists all selling, general and administrative expenses by accounting code for the most recent accounting period and the period. The SG&A must also include:
    - finance expenses
    - taxes and surcharges (except income/profit tax).
  - In the column "Is it a direct selling expense", identify expenses related to direct selling expenses (e.g. inland transport) that has been reported in B-2 Australian sales and/or D-2 Domestic sales.
  - In the column "Is it provisional or unrealised?", identify any accounts that are not actual or realised, such as:
    - unrealised foreign exchange gains/loss
    - provision for doubtful debt
  - In the column "Is it only related to exports or non-goods?", identify any accounts that are related only to either:
    - export sales
    - products that are not the goods under consideration.
  - 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.

**RESPONSE:**

Please see [Worksheet G-4.1 SG&A listing](#).

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.

**RESPONSE:**

Please see [Worksheet G-4.2 Domestic SG&A calculation](#).

3. Complete the worksheet named "G-4.3 Upwards SG&A" to demonstrate that the SG&A listing in G-4.1 is complete by reconciling the SG&A listing to the trial balance and the audited income statement.
  - You must provide this list in electronic format using the template provided.
  - Please use the formulas provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

**RESPONSE:**

Please see [Worksheet G-4.3 Upwards SG&A](#).

4. Please provide the relevant general ledgers (i.e. the detailed listings) of all SG&A accounts (in Excel) covering the period and the most recent financial year.

**RESPONSE:**

Please see [Exhibit G-4.4](#) for the SG&A ledgers.

## **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.

**RESPONSE:**

This worksheet is not applicable since the Company doesn't have any export sales to Australia.

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".

**RESPONSE:**

This worksheet is not applicable since the Company doesn't have any export sales to Australia.

## **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

**RESPONSE:**

Xinyu records actual manufacturing cost of each product, so we report actual CTM for domestic and Australian sales in G-3 and G-5 rather than allocation used to complete these worksheets.

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.

**RESPONSE:**

Not applicable and please refer to answer to the above question.

**G-7 Major raw material costs**

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

**RESPONSE:**

The major raw materials used in the manufacture of the goods is cold-rolled coil (CRC).

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.

**RESPONSE:**

Yes, as we explained above, Xinyu has an integrated production starting from hot-rolled steel: hot-rolled coil (HRC) – pickled coil – cold-rolled coil (CRC) – galvanized steel – color plate.

We completed the [Worksheet G-7.2 Raw material CTM](#) as required.

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.

**RESPONSE:**

Main raw material (CRC) accounts for [Sensitive: proportion of total cost to make].

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.

**RESPONSE:**

As we explained above, Xinyu has an integrated production, and all direct material CRC is self-produced. We provide purchase listing of HRC in [Worksheet G-7.4 Raw material purchases](#).

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

**RESPONSE:**

Please see [Exhibit G-7.5 VAT listing of purchase](#) for the source of the data.

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

**RESPONSE:**

Please see [Exhibit G-7.6\(a\)](#) for the two largest invoices by value and proof of payment.

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.

**RESPONSE:**

No, the Company doesn't have related raw material suppliers.

## **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.

**RESPONSE:**

Please see [Worksheet G-8 Upwards costs](#).

2. Please provide all documents and worksheets, other than those in A-4, G-3 and G-5, required to complete the “G-8 Upwards costs” worksheet.
  - For example, worksheets showing how you identified and categorised the cost to make:
    - the goods under consideration and other costs (e.g. non-goods or tolling services)
    - Domestic, Australian and third country goods under consideration
  - If the documents include spreadsheets, all formulas used must be retained.
  - There must not be any balancing amounts. All amounts must be supported by source documents or worksheets.

**RESPONSE:**

Please see [Exhibit G-8.2 Cost reconciliation](#) for the requested documents.

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.

**RESPONSE:**

The requested documents have been provided in Exhibit G-8.2.

## 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.

### RESPONSE:

Regarding how the production quantities reported at Worksheet G-3 is captured, please refer to Exhibit G-8.2, which includes detailed cost to manufacturing database and process to report Worksheet G-3.

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.

### RESPONSE:

Actual production quantities for all galvanized products are kept by the Company and manually entered accounting system for cost report every month. Please refer to Exhibit G-8.2 for these source documents.

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".

### RESPONSE:

There is opening stock at the beginning of the period and ending stock at the end of the period.

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?

### RESPONSE:

The production volumes are determined according to sales. There is no product mix for the goods.

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

### RESPONSE:

The Company determines the production quantity according to the order, flexibly adjusts the delivery time according to the production schedule and determines the subsequent order receiving capacity.

## SECTION I COUNTERVAILING

Review 611 identified a total of 37 countervailable subsidy programs as applicable to exports of the goods from China.

Program No	Name	Type <sup>4</sup>
1	Hot rolled steel provided by government at less than fair market value	Tax and raw material
2	Coking coal provided by government at less than adequate remuneration	Tax and raw material
3	Coke provided by government at less than adequate remuneration	Tax and raw material
4	Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and Economic and Technological Development Zones	Tax
5	Preferential Tax Policies for Foreign Invested Enterprises– Reduced Tax Rate for Productive Foreign Invested Enterprises scheduled to operate for a period of not less than 10 years	Tax
6	Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)	Tax
7	Preferential Tax Policies for High and New Technology Enterprises	Tax
8	Preferential Tax Policies in the Western Regions	Tax
9	Land Use Tax Deduction	Grant
10	Preferential Tax Policies for High and New Technology Enterprises	Tax
11	Tariff and value-added tax (VAT) Exemptions on Imported Materials and Equipment	Tax
12	One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'	Grant
13	Matching Funds for International Market Development for Small and Medium Enterprises	Grant
14	Superstar Enterprise Grant	Grant
15	Research & Development (R&D) Assistance Grant	Grant
16	Patent Award of Guangdong Province	Grant
17	Innovative Experimental Enterprise Grant	Grant
18	Special Support Fund for Non State-Owned Enterprises	Grant
19	Venture Investment Fund of Hi-Tech Industry	Grant
20	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment.	Grant
21	Grant for key enterprises in equipment manufacturing industry of Zhongshan	Grant
22	Water Conservancy Fund Deduction	Grant

<sup>4</sup> A subsidy in the form of a grant is generally where a public body has provided direct funding to the recipient. A subsidy in the form a tax is generally where the recipient has received a lower or preferential tax rate. A subsidy in the form of 'Less than adequate remuneration' (LTAR) is generally where a manufacturer has purchased cost inputs at a price that is considered less than adequate remuneration for that input.

23	Wuxing District Freight Assistance	Grant
24	Huzhou City Public Listing Grant	Grant
25	Huzhou City Quality Award	Grant
26	Huzhou Industry Enterprise Transformation & Upgrade Development Fund	Grant
27	Wuxing District Public List Grant	Grant
28	Anti-dumping Respondent Assistance	Grant
29	Technology Project Assistance	Grant
30	Equity injection	Grant
31	Environmental Protection Grant	Grant
32	High and New Technology Enterprise Grant	Grant
33	Independent Innovation and High-Tech Industrialisation Program	Grant
34	VAT refund on domestic sales by local authority	Grant
35	Environmental Prize	Grant
36	Jinzhou District Research and Development Assistance Program	Grant

## I-1 General

1. Complete the worksheet named "I-1 Company turnover"
  - This worksheet is a table of the total company revenue over the period and split into:
    - Total revenue for Australian sales, domestic sales and third country sales
    - Revenue of the goods for Australian sales, domestic sales and third country sales
  - You must provide this table in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

### RESPONSE:

Please see [Worksheet I-1 Company turnover](#).

## I-2 Provision of goods at less than adequate remuneration

1. For all suppliers and manufacturers of raw materials listed in "G-7.2 Raw material CTM", provide an explanation and any evidence to support your categorisation of whether the company is a State Invested Enterprise (SIE)

### RESPONSE:

By accessing public information from the government or by enterprise querying websites such as Qichacha or Tianyancha in China, we can access the company's equity ownership structure. Given that the ultimate controller of the company is the government of China, the company being queried can be determined that it is a State Invested Enterprise (SIE).

2. Provide copies of all contractual agreements that detail the obligations of the State Invested Enterprise (SIE) and your business with reference to the granting and receipt of any assistance/benefits.

### RESPONSE:

Please see [Exhibit I-2.2](#) for all the contracts indicating raw materials purchase from SIE.

3. If your business purchased imported raw materials, explain the reason/s for your business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc.

### RESPONSE:

Xinyu doesn't purchase imported raw materials. This question is not applicable.

### I-3 Preferential tax policies

1. Complete the worksheet named "I-3 Income Tax"
  - This worksheet is a table of your company's income tax liability over the last three financial years.
  - You must provide this table in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

**RESPONSE:**

Please see [Worksheet I-3 Income Tax](#).

2. Provide a copy of your company's annual tax return for the last three financial years. If the documents are not in English, please provide a translation of the documents.

**RESPONSE:**

Please see [Exhibit I-3.2](#) for Xinyu's annual tax return for the last three financial years.

3. Provide proof of your company's tax payments to your tax authority over the last three financial years, including any progress payments made and related forms submitted to reconcile the annual tax return.

**RESPONSE:**

Please see [Exhibit I-3.3](#) for Xinyu's tax payments over the last three financial years.

4. What is the general tax rate for enterprises (also referred to as the company or corporate tax rate) during the previous two financial years?

**RESPONSE:**

The general tax rate for enterprises is 25%.

5. Did your company pay less than the general tax rate for enterprises referred to in question I-3.4?  
If yes:

**RESPONSE:**

Yes, Xinyu pay less than the general tax rate.

- a. What tax rate did your company pay?

**RESPONSE:**

Xinyu pays tax rate 15% during the period.

- b. Was the reduction in the tax paid or payable related to any of the preferential income tax programs in the table at the top of Section I Countervailing above?

**RESPONSE:**

Yes, No.32 High and New Technology Enterprise Grant.

- c. What is the name of the program?

**RESPONSE:**

The name of the program is Preferential Treatments for High and New Technology Enterprises.

- d. What is the name of the authority granting your company the reduced tax rate?

**RESPONSE:**

State Taxation Administration, Tianjin Municipal Taxation Bureau.

- e. What is the eligibility criteria to benefit from the reduced tax rate?

**RESPONSE:**

The enterprise has to get the High-Tech Enterprise Certificate.

- f. Provide details of the application process

**RESPONSE:**

Please see [Exhibit I-3.5\(f\)](#) for High-Tech Enterprise application process.

- g. Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.

**RESPONSE:**

The Application Form for High tech Enterprise Certification is filled and submitted online. So, Xinyu doesn't have the blank application form.

- h. Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.

**RESPONSE:**

Xinyu applied for the High-Tech Enterprise online and didn't keep the application form or documents.

- i. Provide a copy of any confirmation or other correspondence from the authority approving your company for the reduction in tax rate. If the documents are not in English, please provide a translation of the documents.

**RESPONSE:**

Please see [Exhibit I-3.5\(i\)](#) for the High-Tech Enterprise Certificate granted to Xinyu.

- j. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

**RESPONSE:**

Applying for a High-Tech Enterprise Certificate does not require any fees.

#### **I-4 Financial grants**

1. Complete the worksheet named "I-4 Grants"
  - This worksheet is a table of the grants received by company over the period plus the two preceding years.
  - You must provide this table in electronic format using the template provided.

- If you have used formulas to complete this worksheet, these formulas must be retained.

**RESPONSE:**

Please see [Worksheet I-4 Grants](#) for the grants received by company starting from 2022.

2. Provide a copy of your company's non-operating income and/or other business income ledgers, extracted directly from your accounting system, for the period covering the period plus the 2 preceding years.

**RESPONSE:**

Please see [Exhibit I-4.2](#) for the other business income ledgers from 2022.01 to 2025.09.

All financial grants are recorded in the account "non-operating income", with the account code 6301.

3. Did your company receive any grants (or any other financial contribution) from any level of government during the period plus the two preceding years?

If yes:

- a. Were any of the grants related to any program listed in the table at the top of Section I above? If yes, identify the program.
- b. Were any of the grants related to programs not listed in the table at the top of Section I above? If yes, provide the names of the programs.

**RESPONSE:**

Yes, Xinyu received some grants and other financial contribution from government during the period plus the two preceding years. Detailed information of these grants is provided in [Worksheet I-4](#).

4. For each of the grants listed in I-4.3:
  - a. What is the name of the grant?
  - b. What is the name of the authority providing the grant?
  - c. What is the eligibility criteria to receive the grant?
  - d. Is the grant directly related to the goods under consideration, export sales to Australia and/or export sales generally?
  - e. Provide details of the application process.
  - f. Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
  - g. Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.
  - h. Provide a copy of any confirmation or other correspondence from the authority approving the grant. If the documents are not in English, please provide a translation of the documents.
  - i. Provide proof of payment of your company receiving the grant (e.g. bank statements).
  - j. Provide a copy of the accounting journal entries relating to the grant.
  - k. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the grant.

**RESPONSE:**

Please see [Worksheet I-4](#) or the required information.

## I-5 Other Programs

**RESPONSE:**

All grants obtained by Xinyu are reported in [Worksheet I-4](#). So there is no other programs and questions in Section I-5 are not applicable.

## PUBLIC RECORD

1. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business).
2. Are you aware of any programs of the Government of China, any of its agencies or any other authorised body, that benefits manufacturers of the goods that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program.)
3. Indicate the location of the program by region, province or municipal level.
4. Indicate the type of program, for example:
  - the provision of grants, awards or prizes
  - the provision of goods or services at a reduced price (e.g. electricity, gas, transport)
  - the reduction of tax payable including income tax and VAT
  - reduction in land use fees
  - loans from Policy Banks at below-market rates or
  - any other form of assistance.

For **each program** that you have identified, answer the following.

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

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-5 in relation to this programme.

1. 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.

**RESPONSE:**

The price is calculated [Sensitive: how is the price determined].

2. 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.

**RESPONSE:**

The price update of Xinyu is based on the market conditions. If the purchase price of HRC in the market, the production cost, and internal costs change significantly, the domestic selling price will also change. There is no price review within the company.

3. 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
  - 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]

**RESPONSE:**

The company does not rank the above factors in order of importance in making pricing decisions. They and others are all of equal importance as the objective of the company is to produce and sell the subject goods profitably. To do so requires the above factors and others to be taken into account to ensure the company conducts its business profitably and will continue to be able to do so. To do otherwise would have adverse consequences for the business.

4. 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?

**RESPONSE:**

Selling prices are affected by production and sale costs. This will vary from time-to-time as costs of production vary overtime.

The company maintains a desired profit margin for the subject goods.

5. 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.

**RESPONSE:**

No, the Company did not offer any price reduction in the domestic market.

6. Do you offer bundled pricing in the domestic 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.

**RESPONSE:**

No, the company did not offer bundle pricing in the domestic market.

7. 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.

**RESPONSE:**

Yes, the volume of sales to a customer influences the selling price in the domestic market. Sales price was affected by cost, the quantity of orders for the same product is directly related to production and manufacturing costs. The greater the quantity, the lower the production cost.

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

**RESPONSE:**

Yes, Xinyu uses sales contracts in the domestic market.

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

**RESPONSE:**

All are from contracted sales.

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

**RESPONSE:**

No.

- (c) How frequently are sales contracts renegotiated?

**RESPONSE:**

Each sales contract is negotiated order-by-order.

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

**RESPONSE:**

The price of each sales contract is determined by the market situation.

- (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.

**RESPONSE:**

No. This is because each order is negotiated by the customer and the company and the price is determined by the market situation. So, there would be no need for customers to review it. Once they signed the contracts, it indicates that they have approved the price review of the company.

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

**RESPONSE:**

No, because prices and other terms are settled after signing the contracts.

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

**RESPONSE:**

Please see [Exhibit D-3.1](#) for the two largest contracts in terms of sales revenue.

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

**RESPONSE:**

The company does not have price lists. The price is calculated [Sensitive: how is the price determined].

10. 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.

**RESPONSE:**

The company did differentiate pricing for different products of the goods in the domestic market because different products have different costs.

11. 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.*

**RESPONSE:**

This question is not applicable since Xinyu doesn't tier or segment domestic customers.

12. 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.

**RESPONSE:**

This question is not applicable since Xinyu doesn't sell the goods to related entities in the domestic market.

**J-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.).

**RESPONSE:**

Xinyu has competitive price, superior quality, reliability and availability in the domestic 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.

**RESPONSE:**

No, Xinyu doesn't conduct brand segmentation in the domestic market for the goods.

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 investigation period.

**RESPONSE:**

The Company did not have any domestic advertising of the goods nor other promotion campaigns.

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.

**RESPONSE:**

There are [Sensitive: the number of the domestic sales team] people in Xinyu's domestic market sales team, located in Tianjin city. Sales team is remunerated according to Xinyu's salary system same applicable for all employees.

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.

**RESPONSE:**

There are no parameters provided to sales staff. The price is determined by market situation.

## EXPORTER'S DECLARATION

I hereby declare that.....(company)  
have completed the attached questionnaire and, having made due inquiry, certify that the  
information contained in this questionnaire is complete and correct to the best of my  
knowledge and belief.

**Name** :.....

**Signature** :.....

**Position in  
Company** :.....

**Date** :.....

## 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. Note that any date of sale claim, other than the invoice date, that is made after submitting a response to this questionnaire may not provide the commission with sufficient time to assess the claim and may not be considered.

**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)**

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)

### **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.