



Australian Government
Department of Industry,
Science and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 688

Product: Certain Flat Rolled Steel Products

From: People's Republic of China (China), Republic of Korea (Korea)

Investigation period: 1 July 2024 to 30 June 2025 (the period)

Response due by: 1 December 2025
Extended to 2 January 2026

Email enquiries to: investigations@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

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

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting an investigation into certain flat rolled steel products exported to Australia from China and Korea.

The commission will use the information you provide to determine normal values and export prices over the investigation period (the period). This information will determine whether certain flat rolled steel products is dumped. The commission will also use this information to determine whether certain flat rolled steel products 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 except Section G – Cost to make and sell.

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the commission to verify the information, we may deem your company to be an uncooperative exporter. In that case the commission must determine a dumping margin and/or 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/or subsidy margin. The commission considers that the dumping margin and/or subsidy margin is not confidential information, but rather an aggregate figure derived from confidential data.

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

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

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- 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 H Particular market situation	<input checked="" type="checkbox"/>
Section I Countervailing	<input checked="" type="checkbox"/>
Section J Domestic Market	<input checked="" type="checkbox"/>
Section K Australian Market	<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 checked="" type="checkbox"/>
B-2.2 Australian sales source	<input checked="" type="checkbox"/>
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 checked="" type="checkbox"/>

PUBLIC RECORD

G-5.2 Australian CTM source	<input checked="" type="checkbox"/>
G-7.2 Raw material CTM	<input checked="" type="checkbox"/>
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>
G-8 Upwards costs	<input checked="" type="checkbox"/>
G-10 Capacity Utilisation	<input checked="" type="checkbox"/>
I-1 Company Turnover	<input checked="" type="checkbox"/>
I-2 Raw Material Purchases <i>[not applicable]</i>	<input type="checkbox"/>
I-3 Income Tax	<input checked="" type="checkbox"/>
I-4 Grants	<input checked="" type="checkbox"/>

GOODS UNDER CONSIDERATION

The goods under consideration (the goods) i.e. the goods exported to Australia, allegedly at dumped prices and/or in receipt of countervailable subsidies, are:

Flat rolled products, of non-alloy or other alloy steel (excluding stainless steel, silicon-electrical steel, tool steel, and high-speed steel), not clad, plated, or coated, not in coils, with a thickness equal to or greater than 4.75 millimetres, of widths greater than or equal to 600 millimetres, with or without patterns in relief.

Further information

Plate steel is typically produced in one of two ways:

1. plate steel manufactured from steel slab. The steel slab rolled directly into plate steel products, or
2. plate steel manufactured by cutting and flattening lengths of hot rolled coil steel (HRC).

Different terms apply for plate steel made from HRC and plate steel made from steel slab. Plate steel made directly from steel slab is often referred to as 'plate'. Plate steel made from HRC is often referred to as 'coil plate', 'hot rolled sheet' or 'sheet'.

Plate steel with patterns in relief (a distinctive raised pattern, sometimes called lozenges) is more commonly referred to by the generic names checker plate, floor plate or tread plate. These products are either manufactured from steel slab or from HRC, depending on thickness.

Imported non-alloy and other alloy plate steel products are most commonly offered in nominal yield strengths of 250 megapascals (MPa) and 350 MPa, depending on application and end use.

Plate steel is manufactured to meet certain Australian and/or international standards or equivalent standards that define specific grade designations, including the recommended or guaranteed properties of each of these product grades. The applicant provided a listing of these Australian standards and their international equivalents at Non-Confidential Attachment A-4.2 of the application, which is available on the public record.

Exclusions

Goods excluded from this application are:

- stainless steel, silicon-electrical steel, tool steel, and high-speed steel
- heat treated quenched & tempered (Q&T) grades of plate steel, and
- Q&T greenfeed grades of plate steel (Q&T greenfeed is supplied only in the 'non heat-treated' condition).

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.

Category	Sub-category	Identifier	Sales data	Cost data
Type	Standard plate	P1	Mandatory	Mandatory
	Floorplate	P2	Mandatory	Mandatory
	Pressure vessel plate	P3	Mandatory	Mandatory
Thickness	<=9.99mm	T1	Mandatory	Mandatory
	>9.99mm to <=50.00mm	T2	Mandatory	Mandatory
	>50.00mm	T3	Mandatory	Mandatory

Nominal Yield Strength	<325 MPa	Y1	Mandatory	Mandatory
	>=325 MPa	Y2	Mandatory	Mandatory
	N/A ¹	Y3	Mandatory	Mandatory
Production Process	Plate from coil	PC	Mandatory	Mandatory
	Plate from slab	PS	Mandatory	Mandatory

In constructing an MCC, use a "-" between each category. For example: P1-Y3-T2-PS

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.

¹ Products with no guaranteed yield strength.

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Company Name: **Hunan Valin Lianyuan Iron and Steel Co., Ltd.** (hereinafter referred to as “HUNAN VALIN” or “the company”)

Name: [Sensitive Information: the name of company’s contact person]

Position in the company: [Sensitive Information: Position of company’s contact person]

Telephone: [Sensitive Information: Telephone of company’s contact person]

E-mail address: [N/A]

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

Name: [Sensitive Information: the name of representative’s contact person]

Address: [Sensitive Information: Address of representative’s contact person]

Telephone: [Sensitive Information: Telephone of representative’s contact person]

E-mail address: [Sensitive Information: E-mail of representative’s contact person]

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.

ANSWER:

HUNAN VALIN's financial records are held at No. 1005 Gangui North Road, LouXing District, Loudi City, Hunan Province, China.

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

ANSWER:

HUNAN VALIN's production records are held at Huangnitang, Loudi City, Hunan Province, China.

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

ANSWER:

HUNAN VALIN's production plant manufacturing the goods is located at Huangnitang, Loudi City, Hunan Province, China.

A-2 Company information

1. What is the legal name of your business?

ANSWER:

The legal name is HUNAN VALIN LIAN YUAN IRON & STEEL CO., LTD. (hereinafter referred to as “HUNAN VALIN”). It is a Limited Liability Company . Please refer to [Exhibit A-2.1 Business License](#).

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

ANSWER:

Not applicable. HUNAN VALIN trades under its own name for its own production of the goods under investigation in the export to Australia market.

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

ANSWER:

Not applicable. HUNAN VALIN has not changed its company name.

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

ANSWER:

Please refer to the Exhibit A-2.4 Board of Directors for the requested information, the last two years has no changed.

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

ANSWER:

Please refer to Exhibit A-2.5 List of related Companies for the diagram showing the ownership structure and the list of all related companies and their functions.

6. Is your company or parent company publicly listed?

If yes, please provide:

- (c) The stock exchange where it is listed and
- (d) Any principle shareholders²

If no, please provide:

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

ANSWER:

HUNAN VALIN is a Limited Liability Company. HUNAN VALIN is wholly owned by [Commercially Sensitive Information: Name of shareholder]

Please find the information of shareholders and the shareholding percentages in the Exhibit A-2.6 List of Shareholders.

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.

ANSWER:

HUNAN VALIN focus its business on manufacturing and selling various types steel related products. HUNAN VALIN sells its products [Commercially Sensitive Information: Company's details of the products and sells and the market company sells into]

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.

ANSWER:

² 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.

HUNAN VALIN could perform almost all the functions above in relation to the goods under consideration, **Commercially Sensitive Information: the related Company's name and its function** [**Commercially Sensitive Information: the relationship between HUNAN VALIN and the related Company**].

9. Provide your company's internal organisation chart.

ANSWER:

Please refer to [Exhibit A-2.9 Internal Organisation Chart](#).

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

ANSWER:

Please refer to [Exhibit A-2.10 Internal Organisation Chart](#).

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

ANSWER:

Please refer to [Exhibit A-2.11 Company Brochure](#).

A-3 General accounting information

1. What is your financial accounting period?

ANSWER:

The financial accounting period of HUNAN VALIN is from January 1 to December 31.

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

ANSWER:

Yes. The financial accounts are audited and the auditor is [**Commercially Sensitive Information: Company auditor's information**].

3. What currency are your accounts kept in?

ANSWER:

HUNAN VALIN's accounts are kept in RMB.

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

ANSWER:

The financial system used by HUNAN VALIN is [**Commercially Sensitive Information: name of financial accounting system**].

5. What is the name of your sales system?

ANSWER:

The sales system used by HUNAN VALIN is [**Commercially Sensitive Information: name of sales system**].

6. What is the name of your production system?

ANSWER:

The production system used by HUNAN VALIN is [Commercially Sensitive Information: name of sales system].

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

ANSWER:

The sales, production and financial of HUNAN VALIN are all in the [Commercially Sensitive Information: name of sales and production systems], which is electronically.

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

ANSWER:

HUNAN VALIN's accounting practice complies 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.

ANSWER:

Not applicable, there were no any changes to HUNAN VALIN accounting practices and/or policies 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.

ANSWER:

Please refer to Exhibit A-4.1 Annual reports and financial statements of HUNAN VALIN for the years 2023 and 2024, and Exhibit A-4.1-R Annual reports and financial statements of [Commercially Sensitive Information: the related Company's name] for the years 2023 and 2024.

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.

ANSWER:

Please refer to Exhibit A-4.1 and Exhibit A-4.1-R for the auditor's letter and the audited financial statement.

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.

ANSWER:

Not applicable. The financial data of HUNAN VALIN and [Commercially Sensitive Information: name of related company] has been 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.

ANSWER:

Not applicable. HUNAN VALIN has not maintained different profit centres during the Period.

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.

ANSWER:

**The audited financial statements of HUNAN VALIN for the most recent financial year, 2024, has been submitted in Exhibit A-4.1 Annual reports.
Please refer to Exhibit A-4.5 Income statements for 2024.1-2025.6.**

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

ANSWER:

Please refer to Exhibit A-4.6 trial balance.

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

ANSWER:

Please refer to Exhibit A-4.7 Chart of Account.

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

SECTION B

EXPORT SALES TO AUSTRALIA

B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and representatives (e.g. agents) including:
 - (a) Marketing and advertising activities
 - (b) Price determination and/or negotiation process
 - (c) Order placement process
 - (d) Order fulfilment process and lead time
 - (e) Delivery terms and process
 - (f) Invoicing process
 - (g) Payment terms and process

ANSWER:

[Commercially Sensitive Information: Company's export sales process.]

Please refer to [Exhibit B-1.1 Export sales process for HUNAN VALIN's diagrams of the export sales 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?

ANSWER:

For goods exported to Australia, [Commercially Sensitive Information: Company's currency] currency invoices are issued.

- (a) Yes. HUNAN VALIN has the foreign currency denominated account for [Commercially Sensitive Information: Company's currency].**
- (b) No. HUNAN VALIN does not use forward contracts to lock in the foreign exchange rate relating to the export sales.**
- (c) One exchange rate per month, and updated once a month.**

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.

ANSWER:

Not applicable, there is no related customers of the goods exported to Australia.

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

ANSWER:

Not applicable, there is no price 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.

ANSWER:

Not applicable, there is no difference in sales prices among different distribution channels.

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.

ANSWER:

Not applicable, there is no 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.

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.

ANSWER:

Not applicable, there is no credit or debit notes.

8. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale:
- (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.

ANSWER:

[Commercially Sensitive Information: Invoice date detail]

B-2 Australian sales listing

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

ANSWER:

Please refer to [Exhibit B-2 Australian sales](#), we have reported in required.

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.

ANSWER:

Please refer to [Exhibit B-3 Sample export 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.

ANSWER:

HUNAN VALIN marked the links to the reported figures in [Exhibit B-2 Australian sales](#) when calculation is required for such linkage.

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.

ANSWER:

Please refer to [Exhibit B-4 Upwards sales](#), **HUNAN VALIN** have reported in required.

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.

ANSWER:

The source information for [Exhibit B-4 Upwards sales](#) is the Financial statements, which has been provided in A-4, please refer to A-4's response.

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.

ANSWER:

Please find the information required in [Exhibit B-4 Upwards sales](#), and the related information has been highlighted.

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.

ANSWER:

The goods under consideration exported to Australia during the period are Certain flat rolled steel products in different specifications. For details of the products exported, please refer to the MCC and other physical characteristics reported for each product code in response to question C-1.2.

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.

ANSWER:

MCC	MCC Category 1 Type	MCC Category 2 Thickness	MCC Category 3 Nominal Yield Strength	MCC Category 4 Production Process	Product code	product standard	steel grade	minimum yield strength	special features
P1-T1-Y1-PS	P1	T1	Y1	PS	[Commercially Sensitive Information: product characteristics]				
P1-T2-Y1-PS	P1	T2	Y1	PS					
P1-T1-Y2-PS	P1	T1	Y2	PS					
P1-T2-Y2-PS	P1	T2	Y2	PS					
P1-T1-Y2-PS	P1	T1	Y2	PS					
P1-T2-Y2-PS	P1	T2	Y2	PS					
P1-T1-Y2-PS	P1	T1	Y2	PS					
P1-T1-Y2-PS	P1	T1	Y2	PS					
P1-T1-Y2-PS	P1	T1	Y2	PS					

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.

Answer:

The goods under consideration sold on domestic market during the period are Certain flat rolled steel products in different specifications. For details of the products exported, please refer to the MCC and other physical characteristics reported for each product code in response to question C-2.2.

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.

ANSWER:

SECTION D DOMESTIC SALES

D-1 Domestic sales process

1. Provide details (and diagrams if appropriate) of the domestic sales process of your company and any other related entities including:
 - (a) Marketing and advertising activities
 - (b) Price determination and/or negotiation process
 - (c) Order placement process
 - (d) Order fulfilment process and lead time
 - (e) Delivery terms and process
 - (f) Invoicing process
 - (g) Payment terms and process

ANSWER:

The process for domestic sales is as follows:

[Commercially Sensitive Information: sales processes to domestic]

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.
 - If you are claiming that sales to related parties are arms length, please explain why you consider the price to be an arms length price unaffected by the relationship.

ANSWER:

[Commercially Sensitive Information: domestic customers related]

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

ANSWER:

Not applicable. HUNAN VALIN does not have price list for the goods under consideration.

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.

ANSWER:

Not Applicable, there is no prices vary according to the distribution channel identified.

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.

ANSWER:

[Commercially Sensitive Information: 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]

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.

ANSWER:

Not applicable. HUNAN VALIN did not issue any credit or debit notes in the period.

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.

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.

ANSWER:

[Commercially Sensitive Information: the date of sale]

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.

ANSWER:

Please refer to the domestic sales data in [Exhibit 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".

ANSWER:

Please refer to [Exhibit 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.

ANSWER:

Please refer to [Exhibit D-3-01 Domestic Sales Documents](#) and [Exhibit D-3-02 Domestic Sales Documents](#).

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

ANSWER:

HUNAN VALIN marked the links to the reported figures in [Exhibit D-2 Domestic sales](#) when calculation is required for such linkage.

D-4 Reconciliation of sales to financial accounts

This section is not required if you have 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.

ANSWER:

Please find the information required under [Exhibit B-4 Upwards sales](#).

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.

ANSWER:

Please find the information required under [Exhibit B-4 Upwards sales](#).

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.

ANSWER:

Please find the information required under [Exhibit B-4 Upwards sales](#).

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:

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

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

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

ANSWER:

Please refer to [Exhibit E-1.1 Average Credit Period](#).

[Commercially Sensitive Information: explanation of the calculation results for the average credit period]

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?

ANSWER:

There was short term borrowings during the period. The average of interest rates is [Commercially Sensitive Information: average of interest rates]

.

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?

ANSWER:

The Company has the three-year time deposit with an average interest rate of [Commercially Sensitive Information: average of interest rates].

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?

ANSWER:

Not applicable for the Company [Commercially Sensitive Information: related to short term borrowings or an overdraft facility denominated in the same foreign currency].

- (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?

ANSWER:

Not applicable for the Company [Commercially Sensitive Information: related to any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in the same foreign currency]

E-2 Packaging

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

ANSWER:

HUNAN VALIN uses [Commercially Sensitive Information: Packing material] for packaging].

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

ANSWER:

HUNAN VALIN uses [Commercially Sensitive Information:Packing material] for packaging.

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

ANSWER:

There is no distinct differences in packaging between your domestic and export sales.

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?

ANSWER:

[Commercially Sensitive Information: related to the information of domestic sales of like goods delivered to the customer and Method of expense allocation].

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

ANSWER:

The delivery terms for export to Australia are [Commercially Sensitive Information:Delivery term].

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?

ANSWER:

[Commercially Sensitive Information: Method of expense allocation.]

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?

ANSWER:

[Commercially Sensitive Information: Method of expense allocation]

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?

ANSWER:

[Commercially Sensitive Information: Method of expense allocation]

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?

ANSWER:

Not applicable, there is no marine insurance occur.

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?

ANSWER:

Not applicable. Delivery terms of HUNAN VALIN's Australian sales during the POI did not include delivered duty paid.

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.

ANSWER:

Not applicable. There is no sales commission in domestic sales.

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:
 - What is the rate of value-added tax (VAT) on sales of the goods and like goods?

ANSWER:

There is no difference in tax liability between domestic and export sales. The value-added tax applicable to the goods and like goods in the period for HUNAN VALIN was 13%.

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

ANSWER:

HUNAN VALIN records the VAT under Account No. 2171001 and 2171023, which is a separate account for tax payable. The VAT is not part of the sales revenue.

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

ANSWER:

Not applicable, this product does not have a value-added tax export refund.

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

ANSWER:

Not applicable. HUNAN VALIN did not import inputs consumed in the productions of the goods under consideration in the period.

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

ANSWER:

Not applicable. HUNAN VALIN not incur other direct selling in relation to domestic sales of like goods.

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

ANSWER:

Not applicable. HUNAN VALIN not incur other direct selling in relation to export sales of the goods 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)*³ for more information.

ANSWER:

Not applicable. HUNAN VALIN does not claim other adjustments.

³ 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.

ANSWER:

[Commercially Sensitive Information: sales processes to any 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.

ANSWER:

Not applicable. There is no related third country customers in HUNAN VALIN.

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.

ANSWER:

HUNAN VALIN reports the date of invoice as date of sale.

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.

ANSWER:

Please refer to third country sales data in [Exhibit 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".

ANSWER:

Please refer to the [Exhibit 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.

ANSWER:

Not applicable. There is no differences in sales to third countries which may affect their comparison to 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.

ANSWER:

Please see the [Exhibit G-1.1 Production process](#) for HUNAN VALIN and LIANGANG SPECIAL.

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.

ANSWER:

[Commercially Sensitive Information: suppliers related]

G-2. Cost accounting practices

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

ANSWER:

[Commercially Sensitive Information: Cost allocation method]

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.

ANSWER:

Not applicable, standard cost is not used in HUNAN VALIN.

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

ANSWER:

[Commercially Sensitive Information: cost accounting practices]

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

ANSWER:

[Commercially Sensitive Information: cost centres]

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

ANSWER:

HUNAN VALIN calculates the production cost to the level of [Commercially Sensitive Information: level of product specificity].

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

ANSWER:

There is no such management accounting for cost.

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.

ANSWER:

Not applicable. There is no start-up operations in relation to the goods.

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

ANSWER:

HUNAN VALIN uses the month-end weighted average method to value raw materials and finished goods inventories.

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

ANSWER:

[Commercially Sensitive Information: the valuation methods for damaged or sub-standard goods generated at the various stages of production]

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

ANSWER:

[Commercially Sensitive Information: the valuation methods for scrap, by products, or joint products]

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

ANSWER:

Not applicable, there is no any management fees/corporate allocations charged to HUNAN VALIN by parent or related company.

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.

ANSWER:

Please refer to the attached **Exhibit G-3 Domestic CTM**, which consists of three sheets, namely **Domestic CTM (VALIN)**, **Domestic CTM (LS)**, and **Domestic CTM (Total)**. [Commercially Sensitive Information: the entities of the cost tables and the relationships between the tables].

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".

ANSWER:

The data in the G-3 domestic CTM worksheet is sourced [Commercially Sensitive Information: the explanation of the data source].

For details, please refer to Exhibit G-3.2 domestic CTM source and the business management platform. If required, we can also provide [Commercially Sensitive Information: Direct evidentiary material regarding the data 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.

ANSWER:

Please refer to Exhibit G-4.1 SG&A listing for details.

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.

ANSWER:

Please refer to Exhibit G-4.2 Dom SG&A calculation for details.

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.

Please refer to [Exhibit G-4.3 Upwards SG&A](#) for details.

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.

Please refer to [Exhibit G-4.4 General ledgers of all SG&A accounts](#) for details.

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.

ANSWER:

Please refer to the attached [Exhibit G-5 Australian CTM](#), which consists of three sheets, namely [Australian CTM \(VALIN\)](#), [Australian CTM \(LS\)](#), and [Australian CTM \(Total\)](#). [Commercially Sensitive Information: Explanation regarding the cost table and its composition].

[Commercially Sensitive Information: Explanation and clarification of the relationship between the cost of MCC (in the cost table) and the cost corresponding to the company's internal product grades].

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".

ANSWER:

The data in the G-5 Australian CTM worksheet is sourced [Commercially Sensitive Information: the explanation of the data source]

For details, please refer to [Exhibit G-5.2 Australian CTM source and the business management platform](#) .

If required, we can also provide [Commercially Sensitive Information: Direct evidentiary material regarding the data source].

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

ANSWER:

[Commercially Sensitive Information: allocation method]

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.

ANSWER:

Please refer to [Exhibit G-6.2-01 2024Q3-Q4-Worksheets Demonstrating the Allocation Methodology and Exhibit G-6.2-01 2025Q1-Q2 Worksheets Demonstrating the Allocation Methodology](#).

[Commercially Sensitive Information: Explanation and clarification of the cost allocation method and its calculation process].

G-7 Major raw material costs

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

ANSWER:

The major raw material used in the manufacture of the goods are [Commercially Sensitive Information: material type]

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.

ANSWER:

Not applicable, the production process of HUNAN VALIN is divided into [Commercially Sensitive Information: production process]

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.

ANSWER:

Please refer to worksheet G-3 for the weighted average percentage of each raw material cost.

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 applicable, please specify whether the quantity of the raw material supplied is dry weight (e.g. dry metric tonne) or wet weight (e.g. wet metric tonne) and wet/dry conversion rates.
- If you have used formulas to complete this worksheet, these formulas must be retained.

ANSWER:

Please refer to [Exhibit G-7.4 Raw material purchases](#) for details.

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

ANSWER:

The data in [Exhibit G-7.4 Raw Material Purchases](#) was [Commercially Sensitive Information: Explanation and clarification of data source].

For details regarding the data source, please refer to [Exhibit G-7.5 - Source for Raw Material Purchases](#).

If required, we can [Commercially Sensitive Information: Direct evidentiary material regarding the data source].

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.

ANSWER:

Please refer to [Exhibit G-7.6 Raw material purchasing documents](#). HUNAN VALIN marked the links to the reported figures in [Exhibit G-7.4 Raw material purchases sales](#) when calculation is required for such linkage.

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.

ANSWER:

[Commercially Sensitive Information: Explanation regarding whether suppliers are affiliated and the determination of prices] .

Please refer to [Exhibit G-7.4 Raw material purchases](#) for details.

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.

ANSWER:

Please refer to [Exhibit G-8 Upwards costs](#) for details, HUNAN VALIN have reported in required.

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.

ANSWER:

Please refer to [Exhibit G-8 Upwards costs](#) for details, HUNAN VALIN have reported in required.

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.

ANSWER:

Please refer to [Exhibit G-8 Upwards costs](#) for details, HUNAN VALIN have reported in required.

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.

ANSWER:

[Commercially Sensitive Information: Cost allocation method.]

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.

ANSWER:

[Commercially Sensitive Information: Cost allocation method]

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".

ANSWER:

[Commercially Sensitive Information: the reasons for any differences between the production quantities reported at worksheet "G-3 domestic CTM" and the sales volumes reported at worksheet "D-2 domestic sales" and the production quantities reported at worksheet "G-5 Australian CTM" and the sales volumes reported at worksheet "B-2 Australian sales"]

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?

ANSWER:

[Commercially Sensitive Information : company determines its volume of production for the goods]

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

ANSWER:

[Commercially Sensitive Information: lead times are typically needed to adjust volumes of production for the goods]

G-10 Capacity Utilisation

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

ANSWER:

Please refer to [Exhibit G-10 Capacity Utilisation](#).

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

ANSWER:

The production capacity is calculated as follows:

[Commercially Sensitive Information: production capacity and capacity utilisation method of calculation]

The Capacity utilization is calculated as follows:

[Commercially Sensitive Information: production capacity and capacity utilisation method of calculation]

3. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:
 - (a) What is the capacity of these facilities?
 - (b) What was the monthly amount of inventory maintained during the investigation period?
 - (c) What is the average period of time that inventory is retained (describe how this is calculated)?

[Commercially Sensitive Information: capacity of facilities]

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

ANSWER:

[Commercially Sensitive Information: changes to the type of capital or technology utilised]

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

ANSWER:

[Commercially Sensitive Information: each plant capable of producing inputs that could be utilised to make the goods]

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

ANSWER:

[Commercially Sensitive Information: significant investments in the past five years]

SECTION H PARTICULAR MARKET SITUATION

H-1 Reporting requirements

1. Describe generally all interaction that your business has with the Government of China at all levels, including (but not limited to):
 - (a) reporting requirements

ANSWER:

Not applicable for there is no such reporting requirements.

- (b) payment of taxes

ANSWER:

HUNAN VALIN pays taxes in accordance with relevant Chinese laws and regulations. These taxes are paid on a regular monthly or quarterly basis.

- (c) senior management representation within your business

ANSWER:

The Chinese government does not have any senior management representation within HUNAN VALIN's business.

- (d) supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC

ANSWER:

HUNAN VALIN is a limited Liability Company (Sole proprietorship of a legal person invested or controlled by a non-natural person), and it is supervised by SASAC or any other bodies under the control of SASAC. This supervision constitutes the exercise of shareholders' rights.

- (e) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions)

ANSWER:

All HUNAN VALIN's business decisions are made and resolved by the senior management of HUNAN VALIN.

- (f) Licensing

ANSWER:

HUNAN VALIN's only interaction with the Chinese government in this regard is the issuance of its Business License. (Loudi Municipal Market Supervision Administration)

- (g) restrictions on land use

ANSWER:

Not applicable. HUNAN VALIN did no direction or restrictions from the Chinese government on its land usage.

- (h) provision of loans or

ANSWER:

Not applicable. There is not any such provision of loans with the Government of China.

- (i) provision of grants, awards or other funds

ANSWER:

Please refer to [Exhibit I-4 Grants](#) for grants.

H-2 Business structure, ownership and management

1. Indicate whether your company is a state-owned or state-invested enterprise (SIE)
 - A state owned enterprise refers to any company or enterprise that is wholly or partially owned by the GOC (either through direct ownership or through association).

ANSWER:

HUNAN VALIN is a state-invested enterprise.

2. List the Board of Directors and Board of Shareholders of your business and all other entities/businesses your business is related to.

ANSWER:

Please refer to [Exhibit A-2.4 Board of Directors](#) and [Exhibit A-2.6 List of Shareholders](#).

3. Indicate the names of common directors and officers between your business and related businesses, where applicable.

ANSWER:

[Commercially Sensitive Information: the names of common directors and officers between your business and related businesses]

4. Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders representatives, employees, or otherwise affiliated with the Government of China (at any level, from any agency, party, or otherwise associated entity, including SASAC)? If yes, identify the individuals, their role on that Board and their affiliation with the Government of China.

ANSWER:

HUNAN VALIN and its related companies directors are not representatives, employees, or otherwise affiliated with the Chinese government.

5. Does your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders have a representative from the Chinese Communist Party (CCP)? If yes, identify their name and title and indicate their position at the board level.

ANSWER:

HUNAN VALIN and its related companies directors are not representatives of or from the Chinese Communist Party.

6. Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders appointed, managed or recommended by the Government of China? If yes, identify any relevant government department(s) they are affiliated with.

ANSWER:

HUNAN VALIN and its related companies' directors are not appointed, managed, or recommended by the Chinese government.

7. Indicate who owns what percentage of all shares in your business and identify whether they are:
- an affiliate, representative, agency or otherwise representative of the Government of China
 - employees of your business
 - foreign investors or
 - other (please specify)

ANSWER:

For the shareholder, please refer to Exhibit A-2.6 List of Shareholders.

Please kindly note that neither shareholder of HUNAN VALIN are the affiliate, representative, agency or otherwise representative of the Chinese government.

8. Provide the details of any significant changes in the ownership structure of your business during the period.

ANSWER:

There are no changes in HUNAN VALIN's ownership structure during the period.

9. Identify any positions within your business that are appointments or designated to act on behalf of Government of China authorities.

ANSWER:

Anyone within HUNAN VALIN is not appointed or designated to act on behalf of the Chinese government.

10. Explain whether there are requirements in law and in practice to have government representation at any level of your business. If there is such a requirement, explain the role of government representatives appointed to any level of your business.

ANSWER:

There are no requirements of law or practice requiring or mandating government representation at any level of HUNAN VALIN's business.

11. If your business is a publicly-traded company, what are the rules regarding the issuance of shares by your business? Identify any stock exchanges on which your business is listed.

ANSWER:

The question is not applicable. HUNAN VALIN is not a publicly-traded company.

12. Provide the monthly trading volume and average monthly trading price of your listed security over the period.

ANSWER:

HUNAN VALIN is not a publicly-traded company. The question is not applicable.

13. Who has the ability to reward, fire or discipline your business' senior managers?

ANSWER:

**Rewards and punishments → relevant internal company rules and regulations;
Appointments and dismissals → company charter.**

14. Do any of your company's senior managers hold positions in any Government of China departments or organisations, associations or Chambers of Commerce? If yes, describe the nature of these positions.

ANSWER:

HUNAN VALIN's senior managers do not hold positions in any Chinese government's departments or organisations, associations or Chambers of Commerce.

15. Provide the names and positions of your company's pricing committee.

ANSWER:

The question is not applicable. HUNAN VALIN does not have the pricing committee.

H-3 Licensing

1. Provide a copy of your business license(s).

ANSWER:

Please find the Business License of HUNAN VALIN in [Exhibit A-2.1 Business license](#).

2. Identify the Government of China departments or offices responsible for issuing the license(s).

ANSWER:

HUNAN VALIN's Business License is issued by the Market Supervision and Administration.

3. Describe the procedures involved in applying for the license(s).

ANSWER:

Firstly, the company needs to apply for registration, which can be processed either online or at the registration office. The main materials required for application include application for company registration (filing), articles of association of the company, copy of shareholders' ID cards , lease agreement for the company domicile, and notice of enterprise name verification.

Then, the authority will review these materials and issue a "Notice of Registration" or "Notice of Non-registration" to the company after the review. The review process very efficient and only takes 1-2 days.

After receiving the "Notice of Registration", the company can visit the registration office and pick up the business license.

4. Describe any requirements or conditions that must be met in order to obtain the license(s).

ANSWER:

No requirements or conditions must be met in order to obtain the license, provided that the company follows steps introduced above.

5. Describe and explain any restrictions imposed on your business by the business license(s).

ANSWER:

No specific restriction is imposed on the business license, other than operating under the scope of business indicated in the Business license.

6. Describe any sanctions imposed on your business if you act outside the scope of your business license(s).

ANSWER:

According to Administrative Regulation of the People's Republic of China on the Registration of Market Entities, when a company modifies any primary registered information without approval or engaging in business activities beyond the approved and registered business scope, the registration authority may, depending on the circumstances, issue a warning to it, impose a fine on it, confiscate its illegal income, order suspension of its business for rectification, or suspend or revoke its business license.

7. Describe and explain any rights or benefits conferred to your business under the license(s).

ANSWER:

The business license is only for registration purpose. No benefits or rights conferred to the business license.

8. Describe the circumstances under which your business license(s) can be revoked, and who has the authority to revoke the license(s).

ANSWER:

[Commercially Sensitive Information: business license(s) can be revoked's circumstances]

H-4 Decision-making, planning and reporting

1. Provide a description of your business' decision-making structure in general and in respect of the goods. This should identify the persons or bodies primarily responsible for deciding:
 - a. what goods are produced
 - b. how the goods are produced
 - c. how levels of inputs such as raw materials, labour and energy are set and secured
 - d. how the use of your outputs, such as product mix, is determined and
 - e. how your business' profit is distributed.

ANSWER:

a.what goods are produced:The executive director holds a meeting to decide, and the production department arranges production.

b.how the goods are produced:Production department and technical center.

c.how levels of inputs such as raw materials, labour and energy are set and secured:Production department, personnel, procurement.

d.how the use of your outputs, such as product mix, is determined and:Contractual agreement, internal planning

e.how your business' profit is distributed: According to business conditions"

2. Provide a description of any Government of China input into the decision-making process respecting your manufacture, marketing and sale of the goods.

ANSWER:

There is no Chinese government's input, guidance or interference in the decision-making process regarding the manufacturing, marketing and sales of the goods produced by HUNAN VALIN.

3. Provide a list of all government departments/offices that are involved, either directly or indirectly, in your manufacture, sale or purchase of the goods.

ANSWER:

There are no government's departments or offices are involved, either directly or indirectly, in the manufacture, sale or purchase of goods produced by HUNAN VALIN.

4. List and describe all reports that must be submitted to the Government of China periodically by your company, and identify the government department/office where each report is filed.

ANSWER:

[Commercially Sensitive Information: the government department/office where each report is filed]

5. Provide a copy of the last two Provincial/City Five Year Plans (including the appendices) for the province/city in which your business is located, whichever is applicable. The copies should be fully translated including the appendices, along with the original Chinese version.

ANSWER:

HUNAN VALIN has no awareness of any Provincial/City Five Year Plans.

6. Does your business develop any five-year plans or similar planning documents? If yes, provide copies of these plans and advise whether these plans have been submitted, reviewed or approved by the Government of China (including the National Development and Reform Commission).

ANSWER:

HUNAN VALIN does not develop any five-year plans or similar planning documents.

7. Provide copies of the minutes of your Board of Directors and Board of Shareholders meetings over the period.

ANSWER:

Please refer to Exhibit H-4.7 The minutes of Board of Directors and Board of Shareholders meetings.

8. Provide copies of the notes to company meetings where pricing decisions on the goods under consideration have been made over the period.

ANSWER:

The question is not applicable. HUNAN VALIN does not hold meetings related to the pricing decisions. The sales price is finally decided by the negotiation with HUNAN VALIN and its customers.

H-5 Financial and investment activities

1. Is your business debt funded? If yes, provide a list of all major lenders and indicate whether any of the lenders are state-owned or state-invested enterprises.

ANSWER:

HUNAN VALIN's major lender please refer to Exhibit H-5.1 Loans.

2. What is the rate of interest paid by your business on all debt instruments over the last 5 years?

ANSWER:

The interest rate is around [Commercially Sensitive Information: interest].

3. Has your business benefited from any concessional interest rates for your loans/debts in the last 5 years? If yes, provide details.

Answer:

HUNAN VALIN did not benefit from any concessional interest rates in the last five years.

- 4. Has your business raised any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments in the last 5 years? If yes:
 - a. explain what instruments were used
 - b. identify the type (e.g government guarantee) and provider of the security and
 - c. explain the reasons for raising the capital.

ANSWER:

HUNAN VALIN did not has not raised any capital using issuance of shares issuance of shares,preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments.

- 5. Does your business have policies on how cash reserves are to be invested? If yes, provide details.

ANSWER:

HUNAN VALIN does not have policies on how cash reserves are to be invested.

- 6. Has your business invested in either government or non-government debt securities (such as bonds, quasi-government bonds)? If yes, provide details (e.g. type of instrument, amount invested and the expected rate of return).

ANSWER:

HUNAN VALIN did not invest in government or non-government debt securities.

H-6 Government policy on the industry

- 1. Are there any Government of China opinions, directives, decrees, promulgations, measures, etc. concerning industry of the goods that were put in place or operating during the period? If yes, please provide:
 - a. copy of the documentation and a translation in English
 - b. documentation concerning the Government of China or any association of the Government of China's notification of the measures concerning the goods to your company during the period.

ANSWER:

HUNAN VALIN has no awareness of such Chinese government's opinions, directives, decrees, promulgations, measures, etc. concerning the goods that were put in place or operating during the period.

- 2. Provide information concerning the name of any Government of China departments, bureaus or agencies responsible for the administration of all Government of China measures concerning the industry of the goods in the regions, provinces or special economic zones where your company is located, including contact information regarding the following areas:
 - industrial policy and guidance on the industry

ANSWER:

Department	National Development and Reform Commission of the People's Republic
Address	No. 38 Yuetan South Street, Xicheng District, Beijing
Phone number	-
Fax number	-

Department	Ministry of Industry and Information Technology of the People's
Address	No. 13 West Chang'an Avenue, Xicheng District, Beijing
Phone number	-
Fax number	-

- market entry criteria for the industry

ANSWER:

Department	National Development and Reform Commission of the People's Republic
Address	No. 38 Yuetan South Street, Xicheng District, Beijing
Phone number	-
Fax number	-
Department	Ministry of Industry and Information Technology of the People's
Address	No. 13 West Chang'an Avenue, Xicheng District, Beijing
Phone number	-
Fax number	-

- environmental enforcement for the industry

ANSWER:

Department	Ministry of Ecology and Environment of the People's Republic of China
Address	No. 12 East Chang'an Avenue, Dongcheng District, Beijing
Phone number	010-65646114
Fax number	-

- management of land utilization

ANSWER:

Department	Ministry of Land and Resources of the People's Republic of China
Address	No. 64, Funei Street, Xicheng District, Beijing
Phone number	010-66558682
Fax number	-

- the China Banking Regulatory Commission for the industry

ANSWER:

Department	China Banking and Insurance Regulatory Commission
Address	No. 15, Financial Street, Xicheng District, Beijing
Phone number	-
Fax number	-

- investigation and inspection of expansion facilities

ANSWER:

HUNAN VALIN has no awareness of any departments or sections in the Chinese government in charge of investigation and inspection of expansion facilities.

- the section in the National Development and Reform Commission that is responsible for the industry and

ANSWER:

HUNAN VALIN has no awareness of any functional division or section of the National Development and Reform Commission that is responsible for the steel industry, or how to contact any such division.

- import licensing for raw materials relating to the goods under consideration.

ANSWER:

Each imported raw material has an import license.

3. Describe any role your company plays in the development of government's industrial plans and/or policies at all levels of government. For example, does your company provide information for, or request inclusion in, any plans, policies, or measures?

ANSWER:

HUNAN VALIN is not involved in or provided with any information for any government's industrial plans or policies.

4. Does your company provide information relating to assessments of the implementation of the plan, policy or measure?

ANSWER:

HUNAN VALIN has no awareness of such plan, policy or measures, and never provided any information relating to assessments for relevant implementation of such plan, policy or measures.

5. Has the Government of China designated your company and/or industry as "pillar," "encouraged," "honourable," or any other designation? If yes, please answer the following questions.
 - a. Explain the purpose of these designations, the criteria for receiving any such designation, and the benefits or obligations that arise from each such designation.
 - b. Is there any connection between these designations and five-year plans or other industrial and/or economic policies or administrative measures?
 - c. Describe any instances in which your company cited Government of China plans, policies, or measures as support for receiving the financing that you report.

ANSWER:

HUNAN VALIN was not designated as "pillar," "encouraged," "honourable" company by the GOC during the period.

H-7 Taxation

1. Were there any export taxes on the exports of the goods during the period?

ANSWER:

The export taxes were not applicable to the goods exported by HUNAN VALIN during the period.

2. What was the value-added tax rebate applicable to exports of the goods during the period?

ANSWER:

There was no value-added tax rebate applicable to the exports of the goods during the period.

3. Have there been any changes to the value-added tax rebate applicable to exports of the goods in the last 5 years? If yes, provide:
 - a. a detailed chronological history of the value-added tax rebate rates
 - b. products affected

- c. the effective dates of the rate changes
- d. fully translated copies of any Government of China notices regarding these changes, including the relevant appendices.

ANSWER:

Not applicable. There have no changes to the value-added tax rebate applicable to exports of the goods in the last 5 years.

4. Are you aware of any tax changes being planned that would impact the industry?

ANSWER:

HUNAN VALIN has no awareness of any tax changes being planned that would impact the industry at this stage.

H-8 Sales Terms

1. Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.

ANSWER:

HUNAN VALIN's sales terms, prices and other contract provisions are decided by the negotiation with customers and authorised by HUNAN VALIN's sales manager.

2. Explain how the selling prices of the goods under consideration by your business are determined, including any Government of China involvement in your business' pricing decisions, and indicate if the goods are subject to Government of China direct or indirect pricing or government guidance pricing.

ANSWER:

HUNAN VALIN determines the final sales prices by negotiating with customers. The Chinese government is not involved in the setting of selling prices nor does it have any guidance role of any sort.

3. Does your business coordinate the selling prices or supply of the goods with other domestic producers or any Government of China departments? If yes, provide details.

ANSWER:

HUNAN VALIN does not coordinate its sales prices or supply of the goods with other domestic producers or any Chinese government's departments.

4. Explain whether your business provides information or data to the Government of China, other government officials or commercial/industry organisations, including those outside of China, which report on the industry.

ANSWER:

HUNAN VALIN does not provide price information or data to the Chinese government, or other government officials or commercial/industry organisations, including that outside of China, which report on the industry.

5. Explain whether your business provides price data to any other person at the provincial, regional or special economic zone level of government.

ANSWER:

HUNAN VALIN does not provide price data to any other person at the provincial, regional or special economic zone level of government.

6. Explain whether your business has encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.

ANSWER:

HUNAN VALIN did not encounter any price guidance or controls established by regional, provincial or special economic zone officials or organisations.

7. Explain whether your business has encountered any other restrictions, limitations, or other considerations imposed on your business.

ANSWER:

HUNAN VALIN is not imposed by any other restrictions, limitations, or other considerations.

8. Which organisation/business entity do you consider as the price leader of the goods?

ANSWER:

Not applicable. There is no price leader in the industry.

9. Does your business have a pricing committee in respect of the goods? If yes, provide the names and positions of all members of the committee.

ANSWER:

HUNAN VALIN does not have the pricing committee.

10. How often does the pricing committee meet to discuss selling prices of the goods? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the period.

ANSWER:

HUNAN VALIN does not have the pricing committee. The question is not applicable.

11. Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.

ANSWER:

HUNAN VALIN's sales terms, price and other contract provisions are decided by the negotiation with customers and authorised by HUNAN VALIN's sales manager.

12. If you have production facilities of the goods in more than one region and/or province, are the laws and regulations in each region the same with respect to pricing of the goods? If no, provide details on the differences.

ANSWER:

HUNAN VALIN does not have any production facilities of the goods in any other region. Thus, the question is not applicable.

H-9 Industry associations

1. Is your business a member of any business or industry associations? If yes, explain your business' relationship with the association and the involvement of the Government of China with the associations.

ANSWER:

HUNAN VALIN is a member of China Iron&Steel Association. This association is an autonomous industry organization. Membership is voluntary, and entities are free to join or leave the association. There is no involvement or control by the Government of China in the company's membership or participation in this organization. We have supplemented our questionnaire response with this clarification.

2. If your business is a member of an industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the Government of China concerning the industry.

ANSWER:

HUNAN VALIN Voluntary participation the China Iron&Steel Association.

Services provided for business:

Information and Data Services:China Iron&Steel Association provides comprehensive, authentic, and valuable data information services to assist enterprises in production and operation, benchmarking and tapping potential, and decision-making analysis.

Organize the collection:organization, and graded release of market conditions, business management, economic and technological information in the domestic and international steel industry.

The role of bridges and links:Play a bridge and link role between the government and members, reflect the demands of enterprises, and provide policy recommendations.

International cooperation: Representing the Chinese steel industry in international exchanges and cooperation, enhancing the industry's international influence.

China Iron&Steel Association The role of the industry:

Promote high-quality development:Promote technological progress, adhere to the concept of green development, and enhance the level of energy conservation and environmental protection.

Industry planning and policies:Participate in drafting industry development plans, industrial policies and regulations, promote industry structural adjustment and eliminate outdated production capacity.

H-10 Statistics submission/recording

1. Indicate if your business makes submissions to the Chinese Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.

ANSWER:

HUNAN VALIN does not make submissions to the Chinese Bureau of Statistics or any other government's organisations.

2. Provide a recent example of a submission that has been made to the Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.

ANSWER:

HUNAN VALIN does not make submissions to the Chinese Bureau of Statistics or any other government's organisation. The question is not applicable.

3. Do the organisations approve or assess your submission? If yes, provide a detailed explanation.

ANSWER:

HUNAN VALIN does not make submissions to the Chinese Bureau of Statistics or any other government's organisation. The question is not applicable.

4. Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.

ANSWER:

HUNAN VALIN does not make submissions to the Chinese Bureau of Statistics or any other government's organisation. The question is not applicable.

H-11 Production/output

1. Is any part of your production subject to any national/regional industrial policy or guidance? If yes, provide details including a background of the policy/guidance and explain any restriction imposed by the policy/guidance. To what extent are any of the policies/guidelines applicable to your business?

ANSWER:

HUNAN VALIN's production of the goods is not subject to any national or regional industrial policies or guidance.

2. Where applicable, how did your business respond to the policies/guidelines?

ANSWER:

HUNAN VALIN's production of the goods is not subject to any national or regional industrial policies or guidance. Thus, the question is not applicable.

3. Provide details regarding any other restrictions (e.g. geographic/regional, downstream, end use, etc.) to the sale of the goods and/or like goods that has been placed upon, or may be imposed, by the Government of China on your business.

ANSWER:

HUNAN VALIN is not aware of any other restrictions imposed by the Chinese government on the sale of Certain flat rolled steel products.

4. Provide a list of all your domestic customers of the like goods, include the location (city and province) of the customer and indicate whether each customer is an SIE.

ANSWER:

Please refer to [Exhibit H-11.4 Domestic customers information](#).

5. Are there any restrictions and/or conditions in relation to the quality or quantity of the production of the goods placed upon your business? If yes, provide details.

ANSWER:

There are no restrictions or conditions placed upon HUNAN VALIN in relation to the quality or quantity of the production of the goods.

6. Does your business require an export licence? If yes, provide details.

ANSWER:

It doesn't need any export licence. China has abolished the system of registration for foreign trade operators on December 30, 2022.

7. Are the goods sold by your business subject to any export restrictions and/or limits during the previous 5 year? If yes, provide details.

ANSWER:

The goods sold by HUNAN VALIN were not subject to any export restrictions or limits during the previous five years.

8. Have there been any changes to your production capacity over the last 5 years? If yes, provide details.

ANSWER:

In the past five years, HUNAN VALIN's production capacity has added a production line.

9. Does your business benefit from any concession on the purchase of any utility services (e.g. electricity, gas, etc.)? If yes explain the nature and the amount of the concession?

ANSWER:

HUNAN VALIN does not benefit from any concession on the purchase of any utility services.

H-12 Adding capacity and/or joint ventures

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

ANSWER:

HUNAN VALIN does not benefit from any concession on the purchase of any utility services.

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

ANSWER:

HUNAN VALIN did not encounter such request during the period. Thus, HUNAN VALIN has no awareness of such information.

H-13 Raw materials

1. Are any of the suppliers related or affiliated with you? If yes, provide details.

ANSWER:

There are related suppliers,for more details please refer to the detailed information in [Exhibit G-7.4 Raw material purchases](#).

2. Do you purchase from State Invested Enterprises? If yes, provide a details.

ANSWER:

Please refer to the detailed information in [Exhibit G-7.4 Raw material purchases](#).

3. If your supplier is based outside China, what import duty rate is applied on the raw materials?

ANSWER:

The import tariff on iron ore is 0 and the value-added tax is 13%.

4. Is there a price difference in purchase price for raw materials between your suppliers? If yes, provide a detailed explanation.

ANSWER:

There is a little difference in purchase price for raw materials between the suppliers, because [Commercially Sensitive Information: the explanation on price difference in purchase price for raw materials between the company's suppliers].

5. Describe in detail your business' purchase procedures of the raw materials, the considerations in selecting a supplier and how the price of the raw materials is determined between you and your suppliers. If it is by tenders, provide details of the criterions/conditions.

ANSWER:

In the procurement process, HUNAN VALIN strives to purchase raw materials from suppliers whose prices are at or below market rates. If both parties reach an agreement on the terms of the procurement contract, HUNAN VALIN will sign the procurement contract with the supplier.

[Commercially Sensitive Information: explanation of the methods and channels for following market prices].

6. Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of China during the period, with respect to raw material inputs.

ANSWER:

HUNAN VALIN was not subjected to any direct or indirect price guidance or controls by the Chinese government during the period.

7. If any of your raw materials for the goods and/or like goods are imported by your business, or related businesses:
- Provide details including a description of the raw material imported, the supplier and country of origin.
 - Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
 - Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
 - Are you eligible for a duty drawback? If yes, provide details.

ANSWER:

a: Description of imported raw materials: iron ore powder, iron ore block, iron ore concentrate, etc. Suppliers: basically all major mines, FMG, Rio Tinto, KUMBA, etc.

Most of the countries of origin are Australia, Brazil, South Africa;

b: The general process of importing raw materials: signing a purchase contract-issuing a letter of credit-filing-customs declaration (a license is required before customs declaration, and there are customs brokers and agents who are responsible for this work)-guarantee/tax payment customs clearance-finally determine the final payment settlement amount before final tax transfer;

c: Customs will issue it after inspection;

d: In theory, the overpaid tax will be refunded, but in actual operation, because the import tax bill is generally deducted in the finance department in the same month, since the deduction has been made, there will be no refund.

8. Do you, or a business associated with you, sell any of the raw materials used to manufacture the goods and/or like goods, or sell the semi-processed goods?
- Please provide a description of the raw material or semi-processed goods which are sold, including whether they are domestic or export transactions, to related or unrelated parties, and how the selling price is determined.

- b. If there is a difference in selling prices between related and unrelated parties, please provide reasons as to why.

ANSWER:

Related company sold raw materials to the company (HUNAN VALIN), for the detail of purchased raw material from related suppliers, please refer to Spreadsheet named "G-7.4 Raw material purchases.

[Commercially Sensitive Information: the description of the raw material or semi-processed goods which are sold]

[Commercially Sensitive Information: the description of difference in selling prices between related and unrelated parties]

SECTION I COUNTERVAILING

The following programs are being investigated

No.	Program name	Type
1	Technique transformation grant for rolling machine	Grant
2	Grant for Industrial enterprise energy management centre construction demonstration project Year 2009	Grant
3	Key industry revitalization infrastructure spending in budget Year 2010	Grant
4	Provincial emerging industry and key industry development special fund	Grant
5	Environmental protection fund	Grant
6	400 sintering desulfuration transformation fund	Grant
7	Intellectual property licensing	Grant
8	Financial resources construction special fund	Grant
9	Reducing pollution discharging and environment improvement assessment award	Grant
10	Coke provided by government at less than adequate remuneration	Remuneration
11	Comprehensive utilization of resources - VAT refund upon collection	Tariff & VAT
12	Grant of elimination of out dated capacity (350 blast furnace)	Grant
13	Grant from Technology Bureau (development and application of coke oven gas waste heat efficiency reuse technology)	Grant
14	Steel slab provided by government at less than adequate remuneration	Remuneration
15	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
16	Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai	Tax
17	Tariff and VAT Exemptions on Imported Materials and Equipment	Tax
18	Wuxing District Public Listing Grant	Grant
19	Balidian Town Public Listing Award	Grant
20	Local Tax Bureau Refund	Tax
21	Return of Farmland Use Tax	Tax
22	Return of Land Transfer Fee	Tax
23	Return of Land Transfer Fee From Shiyou	Tax
24	Dining lampblack governance subsidy of Jinghai County Environmental Protection Bureau	Grant
25	Discount interest fund for technological innovation	Grant
26	Energy conservation and emission reduction special fund project in 2015	Grant
27	Enterprise famous brand reward of Fengnan Finance Bureau	Grant
28	Government subsidy for construction	Grant

PUBLIC RECORD

29	Infrastructure Construction Costs Of Road In Front Of No.5 Factory	Grant
30	New Type Entrepreneur Cultivation Engineering Training Fee Of Jinghai County Science And Technology Commission	Grant
31	Subsidy for Coal-Fired Boiler Rectification	Grant
32	Subsidy for District Level Technological Project	Grant
33	Subsidy For Pollution Control Of Fengnan Environmental Protection Bureau	Grant
34	Subsidy from Science and Technology Bureau of Jinghai County	Grant
35	Subsidy of Environment Bureau transferred from Shiyou	Grant
36	Supporting fund for exhibition from Hongqiao District Commerce Commission	Grant
37	Government subsidy for job stability	Grant
38	Commercial Committee Support Fund	Grant
39	Tianjin Municipal Bureau of Commerce July 2018- December 2018	Grant
40	Aiding fees for cases of technology information collection	Grant
41	Patent supporting fund from Science and Technology Bureau of Jinghai District 2019	Grant
42	Subsidy for patent from Science and Technology Bureau Fengnan District, Tangshan City	Grant
43	Subsidy for Energy collection from the Tangshan Quality and Technology Supervision Bureau	Grant
44	Award to the Patent Innovation from Science and Technology Bureau Fengnan District	Grant
45	Technical innovation subsidy for deducting equipment and boiler	Grant
46	Awards to technology innovation from Bureau of Industry and Information Technology Fengnan District	Grant
47	Awards to "Well-Known Trademarks" from Hebei Province Market Supervision administration Bureau	Grant
48	Grant for Technology ERP	Grant
49	Hebei Province Quality Awards.	Grant
50	Hot rolled steel provided by government at less than fair market value	Tax and raw material
51	Preferential Tax Policies for High and New Technology Enterprises	Tax
52	One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'	Grant
53	Matching Funds for International Market Development for Small and Medium Enterprises	Grant
54	Superstar Enterprise Grant	Grant
55	Research & Development (R&D) Assistance Grant	Grant
56	Patent Award of Guangdong Province	Grant
57	Innovative Experimental Enterprise Grant	Grant
58	Special Support Fund for Non State-Owned Enterprises	Grant
59	Venture Investment Fund of Hi-Tech Industry	Grant

60	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment.	Grant
61	Grant for key enterprises in equipment manufacturing industry of Zhongshan	Grant
62	Water Conservancy Fund Deduction	Grant
63	Wuxing District Freight Assistance	Grant
64	Huzhou City Public Listing Grant	Grant
65	Huzhou City Quality Award	Grant
66	Huzhou Industry Enterprise Transformation & Upgrade Development Fund	Grant
67	Anti-dumping Respondent Assistance	Grant
68	Technology Project Assistance	Grant
69	Equity injection	Grant
70	High and New Technology Enterprise Grant	Grant
71	Independent Innovation and High-Tech Industrialisation Program	Grant
72	VAT refund on domestic sales by local authority	Grant
73	Environmental Prize	Grant
74	Jinzhou District Research and Development Assistance Program	Grant
75	Enterprise support fund	Grant
76	Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and Economic and Technological Development Zones	Tax
77	Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)	Tax
78	Preferential Tax Policies in the Western Regions	Tax
79	Land Use Tax Deduction	Grant

I-1 General

- 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.

ANSWER:

Please refer to [Exhibit I-1 Company turnover](#).

I-2 Provision of goods at less than adequate remuneration

- 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)

ANSWER:

[Commercially Sensitive Information: the criterion for determining whether an enterprise is a state-owned enterprise]

.We are providing evidence of the equity structure for the first and tenth customer companies listed in Exhibit G-7.4 Raw Material Purchases as supporting documentation. Please refer to [Exhibit I-2.1 for the equity structures of these selected customers.](#)

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.

ANSWER:

Not applicable. There is no 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.

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.

ANSWER:

[Commercially Sensitive Information: the reason/s for the Company business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc.]

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.

ANSWER:

Please refer to [Exhibit 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.

ANSWER:

Please refer to [Exhibit I-3.2 Income Tax in last three 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.

ANSWER:

Please refer to [Exhibit I-3.3 Income Tax payments in last three 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?

ANSWER:

The general enterprise income tax rate is 25%.

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

- 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?
- c. What is the name of the program?
- d. What is the name of the authority granting your company the reduced tax rate?
- e. What is the eligibility criteria to benefit from the reduced tax rate?
- f. Provide details of the 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.
- 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.
- 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.
- j. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

ANSWER:

a.What tax rate did your company pay?

Answer:

The company's income tax rate is [Commercially Sensitive Information: preferential tax rate]

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?

Answer:

Related to "Preferential Tax Policies for High and New Technology Enterprises".

c.What is the name of the program?

Answer:

The program is Preferential Tax Policies for High and New Technology Enterprises.

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

Answer:

The authority grants company the reduced tax rate is the Hunan Provincial Department of Science and Technology, Hunan Provincial Department of Finance, State Administration of Taxation, Hunan Provincial Taxation Bureau.

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

Answer:

1. Enterprises registered within the territory of China (excluding Hong Kong, Macao, and Taiwan) shall continue to conduct research and development and transform technological achievements in the high-tech fields supported by the state, form core independent intellectual property rights, and carry out business activities based on them.
2. After being recognized by the high-tech enterprise recognition management organization composed of the science and technology administrative departments of each province (autonomous region, municipality directly under the central government, and city specifically designated in the state plan) and the finance and taxation departments at the same level.
3. When applying for recognition, enterprises must have been registered and established for more than one year.
4. Enterprises acquire ownership of intellectual property rights that play a core supporting role in technology for their main products (services) through independent research and development, acquisition, donation, and mergers and acquisitions.
5. The technology that plays a core supporting role in the main products (services) of the enterprise belongs to the scope specified in the "National Key Supported High tech Fields".

6. The proportion of scientific and technological personnel engaged in research and development and related technological innovation activities in the enterprise shall not be less than 10% of the total number of employees in the year.

7. The proportion of the total research and development expenses of the enterprise in the past three accounting years (calculated based on actual operating time if the actual operating period is less than three years) to the total sales revenue of the same period meets the corresponding requirements.

(1) Enterprises with sales revenue of less than 50 million (inclusive) in the past year, accounting for no less than 5%;

(2) Enterprises with sales revenue of 50 million to 200 million (inclusive) in the past year, accounting for no less than 4%;

(3) The proportion of enterprises with sales revenue of over 200 million in the past year shall not be less than 3%.

Among them, the total research and development expenses incurred by enterprises within China shall account for no less than 60% of the total research and development expenses.

8. In the past year, the proportion of revenue from high-tech products (services) to the total revenue of the enterprise during the same period shall not be less than 60%.

9. The evaluation of enterprise innovation capability should meet the corresponding requirements.

10. The enterprise has not experienced any major safety or quality accidents or serious environmental violations within the year prior to the application for certification.

f. Provide details of the application process

Answer:

The application process is structured as follows:

1. Self evaluation and registration; 2. Files submission; 3. Compliance review; 4. Publicity and filing; 5. Reexamination and maintenance.

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

Answer:

Please refer to [Exhibit I-3.5g](#) 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.

Answer:

After submitting the application and got the license, the company does not keep the application form.

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.

Answer:

Please refer to [Exhibit I-3.5i](#) High and New Technology Enterprises certificate. Confirmation from the authority approving refers to the High and New Technology Enterprises certificate issued by the approving agency, which is valid for three years. Enterprises need to re certify every three years.

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

Answer:

Not applicable, there is no fees charged to, or expenses incurred by business for purposes of receiving the program.

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.

ANSWER:

Please refer to [Exhibit I-4 Grants](#).

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.

ANSWER:

Please refer to [Exhibit I-4.2 Other business income ledgers](#).

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.

ANSWER:

Please refer to [Exhibit I-4 Grants](#).

4. For each of the grants listed in I-4.3:
 - a. What is the name of the grant?

ANSWER:

Please refer to [Exhibit I-4 Grants](#) for the name of the grant.

- b. What is the name of the authority providing the grant?

ANSWER:

Please refer to [Exhibit I-4 Grants](#) for the name of the authority providing the grant.

- c. What is the eligibility criteria to receive the grant?

ANSWER:

Not applicable. There is no 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?

ANSWER:

Please refer to [Exhibit I-4 Grants](#) for the details.

- e. Provide details of the application process.

ANSWER:

The application process is structured as follows:

Submission to Authority->Required Documentation->Application Channel->Review Process->Approval.

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

ANSWER:

Not applicable. There is no blank application form.

- 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.

ANSWER:

Not applicable. There is no completed application form.

- 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.

ANSWER:

Please refer to [Exhibit I-4.4.h Receiving document](#) for the confirmation from the authority approving the grant. Due to [Commercially Sensitive Information: quantity of subsidies] during the investigation period, the questionnaire submitted attachments for deferred income and other income. If the investigator requests more attachments, they will fully cooperate and provide them in a timely manner.

- i. Provide proof of payment of your company receiving the grant (e.g. bank statements).

ANSWER:

Please refer to [Exhibit I-4.4.h receiving documents](#) for the grant. Due to [Commercially Sensitive Information: quantity of subsidies] during the investigation period, the questionnaire submitted attachments for deferred income and other income. If the investigator requests more attachments, they will fully cooperate and provide them in a timely manner

- j. Provide a copy of the accounting journal entries relating to the grant.

ANSWER:

Please refer to [Exhibit I-4 Grants](#).

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

ANSWER:

Not applicable. There is no fees charged to, or expenses incurred by your business for purposes of receiving the grant.

I-5 Other Programs

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).

ANSWER:

Not applicable as the company has no business operations in other provinces.

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.)

ANSWER:

Not applicable. There is no other programs.

3. Indicate the location of the program by region, province or municipal level.

ANSWER:

Not applicable. There is no other programs.

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.

ANSWER:

Not applicable. There is no other programs.

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.

ANSWER:

Not applicable. There is no other programs.

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).

ANSWER:

Not applicable. There is no other programs.

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

ANSWER:

Not applicable. There is no other programs.

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.

ANSWER:

Not applicable. There is no other programs.

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

ANSWER:

Not applicable. There is no other programs.

10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.

ANSWER:

Not applicable. There is no other programs.

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.

ANSWER:

Not applicable. There is no other programs.

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.

ANSWER:

Not applicable. There is no other programs.

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.

ANSWER:

Not applicable. There is no other programs.

14. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.

ANSWER:

Not applicable. There is no other programs.

15. To your knowledge, does the program still operate or has it been terminated?

ANSWER:

Not applicable. There is no other programs.

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?

ANSWER:

Not applicable. There is no other programs.

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.

ANSWER:

Not applicable. There is no other programs.

SECTION J DOMESTIC MARKET

J-1 Prevailing conditions of competition in the domestic market

1. Describe the domestic market for the goods and the prevailing conditions of competition within the market, including:
 - (a) Provide an overall description of the domestic market which explains its main characteristics and trends over the past five years

ANSWER:

The Chinese market is very competitive with many steel manufacturing a wide rang and complex profiles.

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

ANSWER:

Construction industry:

Construction steel: Hot rolled steel coils are widely used in infrastructure construction such as houses, bridges, and roads. These construction projects require a large amount of steel for structural construction, and hot-rolled steel coils are highly favored by construction companies for their excellent processing performance and cost-effectiveness.

Automotive industry:

Automotive steel: Hot rolled steel coils are used for automotive body, chassis and other parts, with high performance requirements for steel coils, such as yield strength and tensile strength.

Home appliance industry:

Home appliance steel: Hot rolled steel coils are also widely used in home appliance manufacturing, with high requirements for the surface quality and dimensional accuracy of steel coils.

Oil and gas industry:

Steel for oil pipelines: Hot rolled steel coils are used to manufacture oil and gas pipelines, requiring good corrosion resistance and strength.

Shipbuilding:

Ship steel: Hot rolled steel coils are used in ship manufacturing, requiring good corrosion resistance and strength, and are commonly used in the structural parts of ships.

Other industrial sectors:

Heavy industrial applications: Thicker hot-rolled steel coils are mainly used for heavy industrial applications where strength and durability are crucial, such as machinery manufacturing, pressure vessels, etc.

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

ANSWER:

HUNAN VALIN is unaware of this ratio.

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

ANSWER:

The factors that affect the consumption and demand changes in the domestic market for hot-rolled steel coils mainly include the following aspects:

Macroeconomic environment:

Economic growth or recession will directly affect the demand for hot-rolled steel coils in various industries. During economic prosperity, industries such as construction and manufacturing develop rapidly, leading

to a strong demand for hot-rolled steel coils; When the economy is in a downturn, demand decreases accordingly.

Raw material prices:

The production of hot-rolled steel coils mainly relies on raw materials such as iron ore and coke. The fluctuation of iron ore prices directly affects the production cost of hot-rolled steel coils, which in turn affects their market prices and demand. When raw material prices rise, production costs increase, which may lead to an increase in the price of hot-rolled steel coils; On the contrary, a decrease in raw material prices will lower production costs, which may drive down prices.

Policy factors:

The government's industrial policies, environmental policies, and trade policies will all have an impact on the hot-rolled steel coil market. For example, the strengthening of environmental policies may lead to some high polluting steel companies reducing or shutting down production, thereby affecting the supply of hot-rolled steel coils. Changes in trade policies, such as tariff adjustments, may also affect the import and export of hot-rolled steel coils, thereby affecting domestic market prices.

Seasonal factors:

There is a certain seasonal fluctuation in the demand for hot-rolled steel coils. For example, the construction industry is usually more active in spring and summer, during which the demand for hot-rolled steel coils may increase. In winter, due to weather conditions, construction activities decrease, resulting in a corresponding decrease in demand for hot-rolled steel coils.

International market impact:

The price fluctuations in the international steel market will also have an impact on the domestic hot-rolled steel coil market. The rise in global steel prices may drive up domestic hot-rolled coil prices, and vice versa. In addition, factors such as international trade frictions and exchange rate fluctuations may also affect the import and export of hot-rolled steel coils, thereby affecting the domestic market.

Technological progress:

New production technologies and processes can improve the quality and performance of hot-rolled steel coils, reduce production costs, and thus affect their market competitiveness and demand.

Development of downstream industries:

The development status and technological innovation of downstream industries such as construction, automobiles, and machinery have a significant impact on the demand for hot-rolled steel coils. For example, the advancement of infrastructure construction, the rapid development of new energy vehicles, and the upgrading of traditional cars all require a large amount of hot-rolled steel coils for the manufacturing of car bodies and components.

These factors work together to determine the consumption and demand changes of hot-rolled steel coils in the domestic market.

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

ANSWER:

HUNAN VALIN is unaware of market segmentations in the domestic market.

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

ANSWER:

HUNAN VALIN is unaware of this question.

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

ANSWER:

HUNAN VALIN is unaware of this question.

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

ANSWER:

HUNAN VALIN is unaware of this question.

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

ANSWER:

HUNAN VALIN is unaware of this question.

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

ANSWER:

Not applicable for that HUNAN VALIN is unaware of the questions 1(a) to (i).

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

ANSWER:

The participants in the market include manufacturers, trading companies, distributors and end users.

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

ANSWER:

HUNAN VALIN has no awareness of the specific situation of the significant market participants in Chinese market.

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

ANSWER:

HUNAN VALIN has no awareness of any detailed information for any commercially significant importers in the Chinese market for the goods during the period.

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

ANSWER:

HUNAN VALIN has no awareness of any product standards and the range of the goods published by the Chinese government.

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

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

ANSWER:

HUNAN VALIN has no awareness of any entry restrictions for new participants into the Chinese market for the goods under consideration.

J-2 Goods in the domestic market

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

ANSWER:

The differences in terms of quality, price, availability, and technical support between the goods in the Chinese market are mainly caused by factors such as specification, hardness, and chemical composition. HUNAN VALIN has no awareness of the prevalence of labels and the product segmentation of the other companies.

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

ANSWER:

The goods under consideration are used in a wide variety of end use applications.

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

ANSWER:

The price, quality, and delivery period are the major factors that influence purchasing decisions or purchaser preferences in the Chinese market.

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

ANSWER:

HUNAN VALIN has no awareness of any commercially significant market substitutes in the Chinese market.

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

ANSWER:

HUNAN VALIN has no awareness of any changes in market or consumer preferences in the domestic market for the goods in the last five years.

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

1. Describe the importance of the domestic market to your company's operations. In your response describe:
 - (a) The proportion of your company's sales revenue derived from sales of the goods in the domestic market and
 - (b) The proportion of your company's profit derived from sales of the goods in the domestic market.

In responding to question 1 please provide evidence supporting calculations.

ANSWER:

Please refer to the worksheet of Exhibit I-1 for HUNAN VALIN's sales turnover.

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

ANSWER:

HUNAN VALIN is not the price leader for the goods in the Chinese market. HUNAN VALIN is only an ordinary participant in the Chinese market, which follows the market principle and determines the domestic market sales price based on production costs of the goods. HUNAN VALIN has no awareness of the price leaders in the Chinese market.

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

ANSWER:

HUNAN VALIN is subject to the cost-plus pricing, and the price of the goods is consistent with the market principle. HUNAN VALIN does not have any relevant documents.

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

ANSWER:

HUNAN VALIN determines the sales price based the cost-plus pricing. Thus, HUNAN VALIN firstly sets up a benchmark for the price, which is consistent with the cost accounting and the market principle. Following to the benchmark, HUNAN VALIN conducts negotiations with different customers, and the final sales price would be determined case by case.

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

ANSWER:

Prices vary alongside the changes in the prevailing steel prices.

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

ANSWER:

[Commercially Sensitive Information: Rank]

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

ANSWER:

[[Commercially Sensitive Information: relationship between selling price and costs to make and sell in the domestic market]

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

ANSWER:

HUNAN VALIN does not offer price reductions in Chinese market. The question is not applicable.

9. 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.

ANSWER:

HUNAN VALIN does not offer bundled pricing in Chinese market. The question is not applicable.

10. 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.

ANSWER:

The volume of sales to a customer or the size of an order do not affect HUNAN VALIN's sales price in Chinese market.

11. Does your organisation/business entity use sales contracts in the domestic market? If yes:
(a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?

ANSWER:

HUNAN VALIN uses sales contracts with all its customers. The question is not applicable.

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

ANSWER:

HUNAN VALIN does not offer exclusivity contracts. The question is not applicable.

- (c) How frequently are sales contracts renegotiated?

ANSWER:

HUNAN VALIN does not renegotiate its signed sales contracts. The question is not applicable.

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

ANSWER:

HUNAN VALIN does not review the price between sales contracts.

- (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.

ANSWER:

[Commercially Sensitive Information: price reviews for customers within contracts.]

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

ANSWER:

[Commercially Sensitive Information: costs to make and sell]

- (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.

ANSWER:

For the list of the customers, please refer to Exhibit H-11.4 Domestic customers information. In HUNAN VALIN, invoices are issued to customers to pay, for the sample of the domestic sales, please refer to Exhibit D-3.1 Domestic Sales Documents.

12. 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.

ANSWER:

[Commercially Sensitive Information: the price list of the goods used in the domestic market during the investigation period]

13. 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.

ANSWER:

[Commercially Sensitive Information: differentiate pricing for different products/models of the goods in the domestic market]

14. 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.

ANSWER:

HUNAN VALIN does not tier or segment its Chinese customers for the goods in terms of pricing. Thus, the question is not applicable.

15. 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.

ANSWER:

HUNAN VALIN sells the goods to related entities, and the price setting shows no difference to that of the unrelated sales.

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.).

ANSWER:

The goods of HUNAN VALIN have the advantages of high quality, reliability, and availability, which are the selling points of HUNAN VALIN in the Chinese 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.

ANSWER:

HUNAN VALIN does not conduct brand segmentation in the Chinese market for the goods. The question is not applicable.

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.

ANSWER:

[Commercially Sensitive Information: examples of your domestic advertising of the goods over the past five years].

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.

ANSWER:

[Commercially Sensitive Information: domestic market sales team]

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.

ANSWER:

[Commercially Sensitive Information: sales staff to assist in establishing pricing for the goods when negotiating sales with customers]HUNAN VALIN does not have any relevant internal documents.

SECTION K AUSTRALIAN MARKET

K-1 Prevailing conditions of competition in the Australian market

1. Describe the Australian market for the goods and the prevailing conditions of competition within the market, including:
 - (a) Provide an overall description of the Australian market for the goods which explains its main characteristics and trends over the past five years
 - (b) Provide the sources of demand for the goods in Australia, including the categories of customers, users or consumers of the product
 - (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b)
 - (d) Describe the factors that influence consumption/demand variability in Australia, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production
 - (e) Describe any market segmentations in Australia; such as geographic or product segmentations
 - (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e)
 - (g) Describe the way in which Australian manufactured and other imported goods compete in the Australian market
 - (h) Describe the ways that the goods are marketed and distributed in the Australian market and
 - (i) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

K-2 Goods in the Australian market

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

ANSWER:

There is no real difference manufactured in China vs Australia.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

K-3 Relationship between price and cost in Australia

1. Describe the importance of the Australian market to your company's operations. In your response describe:
 - (a) The proportion of your company's sales revenue derived from sales of the goods in Australia and
 - (b) The proportion of your company's profit derived from sales of the goods in Australia.

In responding to question 1 please provide evidence supporting calculations.

ANSWER:

Please refer to the worksheet of [Exhibit I-1](#) for HUNAN VALIN's sales turnover.

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

ANSWER:

Not applicable, HUNAN VALIN is not aware of this information.

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

ANSWER:

[Commercially Sensitive Information: the nature of product pricing]

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

ANSWER:

[Commercially Sensitive Information: the process for how the selling prices of the goods for the Australian market by business are determined]

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

ANSWER:

As indicated above, the price is negotiated for each contract, so there is no prices reviewing mechanism.

6. Rank the following factors in terms of their influence on your pricing decisions in the Australian market, with the most important factor ranked first and the least important factor ranked last:
- Competitors' prices
 - Purchase price of raw materials
 - Cost to make and sell the goods
 - Level of inventory
 - Value of the order
 - Volume of the order
 - Value of forward orders
 - Volume of forward orders
 - Customer relationship management
 - Supplier relationship management
 - Desired profit
 - Brand attributes
 - Other [please define what this factor is in your response]

ANSWER:

[Commercially Sensitive Information: Rank]

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

ANSWER:

[Commercially Sensitive Information:the relationship between selling price and costs to make and sell in the Australian market]

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

ANSWER:

[Commercially Sensitive Information: price reduction]

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

ANSWER:

There is no bundled pricing in the Australian market.

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

ANSWER:

[Commercially Sensitive Information: influence the selling price factors]

11. Does your organisation/business entity use sales contracts in the Australian market? If yes:
(a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?

ANSWER:

[Commercially Sensitive Information: proportion of your sales revenue would come from contracted sales versus uncontracted sales]

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

ANSWER:

HUNAN VALIN does not offer exclusivity contracts. The question is not applicable.

- (c) How frequently are sales contracts renegotiated?

ANSWER:

HUNAN VALIN does not renegotiate its signed sales contracts. The question is not applicable.

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

ANSWER:

HUNAN VALIN does not review the price between sales contracts.

- (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.

ANSWER:

[Commercially Sensitive Information: opportunities for price reviews for customers within contracts]

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

ANSWER:

[Commercially Sensitive Information: changes in your costs to make and sell enable you to review prices for customers within 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.

ANSWER:

For the list of the customers, please refer to the worksheet of [Exhibit B-2](#) for Australian customers information. For the copies of the two largest contracts, please refer to [Exhibit B-3.1 Export Documents](#).

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

ANSWER:

Not applicable, HUNAN VALIN is not use price lists.

13. How do you differentiate pricing for different products/models of the goods in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost 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.

ANSWER:

There is no different products/models of the goods in the Australian market.

14. Do you tier or segment your Australian 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.

ANSWER:

[Commercially Sensitive Information: terms of pricing]

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

ANSWER:

Not applicable. There is no related entities in Australia.

K-4 Marketing and sales support in the Australian market

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

ANSWER:

Quality and compliance to the Australian Standards.

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

ANSWER:

There is no conduct brand segmentation in the Australian market for the goods.

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

ANSWER:

Not applicable. There is no Australian advertising of the goods over the past five years.

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

ANSWER:

HUNAN VALIN does not have an Australian sales team.

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.

ANSWER:

HUNAN VALIN does not have input into the selling price, but provide feedback and suggestions.

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.