



Australian Government
Department of Industry,
Science and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 692

Product: Certain welded steel mesh sheets

From: The People's Republic of China and Malaysia

Investigation period: 1 October 2024 – 30 September 2025 (the period)

Response due by: 2 January 2026 (extension to 23 January 2016)

Email enquiries to: investigations1@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.

TABLE OF CONTENTS

TABLE OF CONTENTS	2
INSTRUCTIONS	4
CHECKLIST	7
GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES	7
SECTION A COMPANY INFORMATION	11
A-1 COMPANY REPRESENTATIVE AND LOCATION	11
A-2 COMPANY INFORMATION	11
A-3 GENERAL ACCOUNTING INFORMATION	13
A-4 FINANCIAL DOCUMENTS	14
SECTION B EXPORT SALES TO AUSTRALIA	17
B-1 AUSTRALIAN EXPORT SALES PROCESS	17
B-2 AUSTRALIAN SALES LISTING	19
B-3 SAMPLE EXPORT DOCUMENTS	19
B-4 RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS	20
SECTION C EXPORTED GOODS & LIKE GOODS	21
C-1 MODELS EXPORTED TO AUSTRALIA	21
C-2 MODELS SOLD IN THE DOMESTIC MARKET	21
C-3 INTERNAL PRODUCT CODES	22
SECTION D DOMESTIC SALES	24
D-1 DOMESTIC SALES PROCESS	24
D-2 DOMESTIC SALES LISTING	26
D-3 SAMPLE DOMESTIC SALES DOCUMENTS	26
D-4 RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS	27
SECTION E DUE ALLOWANCE	28
E-1 CREDIT EXPENSE	28
E-2 PACKAGING	29
E-3 DELIVERY	30
E-4 OTHER DIRECT SELLING EXPENSES	31
E-5 OTHER ADJUSTMENT CLAIMS	32
SECTION F THIRD COUNTRY SALES	33
F-1 THIRD COUNTRY SALES PROCESS	33
F-2 THIRD COUNTRY SALES LISTING	33
F-3 DIFFERENCES IN SALES TO THIRD COUNTRIES	34
SECTION G COST TO MAKE AND SELL	35
G-1. PRODUCTION PROCESS	35
G-2. COST ACCOUNTING PRACTICES	37
G-3 COST TO MAKE ON DOMESTIC MARKET	40
G-4 SELLING, GENERAL & ADMINISTRATIVE EXPENSES	40
G-5 COST TO MAKE THE GOODS EXPORTED TO AUSTRALIA	41
G-6 COST ALLOCATION METHOD	41
G-7 MAJOR RAW MATERIAL COSTS	42
G-8 RECONCILIATION OF COST TO MAKE TO AUDITED FINANCIAL STATEMENTS	43
G-9 PRODUCTION OF THE GOODS UNDER CONSIDERATION	44
G-10 CAPACITY UTILISATION	46
SECTION H PARTICULAR MARKET SITUATION	48
H-1 REPORTING REQUIREMENTS	ERROR! BOOKMARK NOT DEFINED.
H-2 BUSINESS STRUCTURE, OWNERSHIP AND MANAGEMENT	ERROR! BOOKMARK NOT DEFINED.
H-3 LICENSING	ERROR! BOOKMARK NOT DEFINED.

H-4	DECISION-MAKING, PLANNING AND REPORTING	ERROR! BOOKMARK NOT DEFINED.
H-5	FINANCIAL AND INVESTMENT ACTIVITIES	ERROR! BOOKMARK NOT DEFINED.
H-6	GOVERNMENT POLICY ON THE INDUSTRY	ERROR! BOOKMARK NOT DEFINED.
H-7	TAXATION	ERROR! BOOKMARK NOT DEFINED.
H-8	SALES TERMS	ERROR! BOOKMARK NOT DEFINED.
H-9	INDUSTRY ASSOCIATIONS	ERROR! BOOKMARK NOT DEFINED.
H-10	STATISTICS SUBMISSION/RECORDING	ERROR! BOOKMARK NOT DEFINED.
H-11	PRODUCTION/OUTPUT	ERROR! BOOKMARK NOT DEFINED.
H-12	ADDING CAPACITY AND/OR JOINT VENTURES	ERROR! BOOKMARK NOT DEFINED.
H-13	RAW MATERIALS.....	ERROR! BOOKMARK NOT DEFINED.
SECTION I DOMESTIC MARKET		49
I-1	PREVAILING CONDITIONS OF COMPETITION IN THE DOMESTIC MARKET	49
I-2	GOODS IN THE DOMESTIC MARKET	57
I-3	RELATIONSHIP BETWEEN PRICE AND COST IN THE DOMESTIC MARKET	60
I-4	MARKETING AND SALES SUPPORT IN THE DOMESTIC MARKET	64
SECTION J AUSTRALIAN MARKET		66
J-1	PREVAILING CONDITIONS OF COMPETITION IN THE AUSTRALIAN MARKET	66
J-2	GOODS IN THE AUSTRALIAN MARKET	71
J-3	RELATIONSHIP BETWEEN PRICE AND COST IN AUSTRALIA.....	74
J-4	MARKETING AND SALES SUPPORT IN THE AUSTRALIAN MARKET.....	79
EXPORTER'S DECLARATION.....		80
APPENDIX GLOSSARY OF TERMS.....		81

INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting a dumping investigation into certain welded steel mesh sheets exported to Australia from the People's Republic of China (China) and Malaysia.

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 welded steel mesh sheets is dumped..

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 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. The commission considers that the dumping margin is not confidential information, but rather an aggregate figure derived from confidential data

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

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

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- 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 (China only)	<input type="checkbox"/>
Section I Domestic Market	<input checked="" type="checkbox"/>
Section j 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-5 Australian CTM	<input checked="" type="checkbox"/>
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"/>

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods under consideration (the goods) i.e. the goods exported to Australia, allegedly at dumped prices, are:

Steel mesh sheets, welded at the intersection, of longitudinal and transverse members with cross-sectional diameters of between 3mm to 14mm (inclusive) and having at least one aperture size of 80cm² or more.

Sheets of the subject welded steel mesh have a maximum nominal length of up to and including 15 metres and includes sheets that may have bends.

The goods under consideration do not include welded steel mesh sheets made from stainless steel as defined under Note 1(e) to Chapter 72, Schedule 3 of the Customs Tariff Act 1995.

The goods include all welded steel mesh sheets meeting the above description irrespective of steel surface profile, alloy content or coating.

Further information

Aperture size' refers to the nominal area calculated by multiplying the distance between the longitudinal members and the transverse members. For example, an aperture size of 80 cm² may denote an aperture with longitudinal members 8cm apart and transverse members 10cm apart.

'Length' is measured from the ends of the longitudinal members.

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	Key category
Prime	Prime	P	Mandatory	Mandatory	Yes
	Non-Prime	N			
Coating	Plated or coated with zinc or with zinc alloys (e.g., zinc-aluminium, zinc-aluminium-magnesium)	G	Mandatory	Mandatory	Yes
	Other coatings (e.g., paint, plastics, polyvinyl chloride, epoxy resin)	O			
	No coating	N			
Highest nominal cross-sectional diameter (millimetres or "mm") of longitudinal members	Greater than or equal to 3 and less than 6	A	Mandatory	Optional	Yes
	Greater than or equal to 6 and less than 12	B			
	Greater than or equal to 12 and less than or equal to 14	C			
Sheet sized measured by nominal area (sheet length x sheet width in m ²)	Less than or equal to 3	S	Mandatory	Optional	Yes
	Greater than 3 and less than or equal to 6	M			
	Greater than 6 and less than or equal to 9	L			
	Greater than 9	XL			

In constructing a MCC, use a "-" between each category. For example: **P-G-A-L**

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

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

**SECTION A
COMPANY INFORMATION**

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: [REDACTED]
Position in the company: Business Director
Telephone: [REDACTED]
E-mail address: [REDACTED]

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

Name: [REDACTED]
Address: [REDACTED]
Telephone: [REDACTED]
E-mail address: [REDACTED]

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.

The company's primary financial and production records are maintained at:
Kamen Steel Industries Sdn Bhd
No. 873 MK 13, Jalan Perindustrian Bukit Minyak 1,
Kawasan Perindustrian Bukit Minyak,
14100 Bukit Mertajam, Pulau Pinang, Malaysia.

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

The company's primary financial and production records are maintained at:
Kamen Steel Industries Sdn Bhd
No. 873 MK 13, Jalan Perindustrian Bukit Minyak 1,
Kawasan Perindustrian Bukit Minyak,
14100 Bukit Mertajam, Pulau Pinang, Malaysia.

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

Kamen Steel Industries Sdn Bhd
No. 873 MK 13, Jalan Perindustrian Bukit Minyak 1,
Kawasan Perindustrian Bukit Minyak,
14100 Bukit Mertajam, Pulau Pinang, Malaysia.

A-2 Company information

1. What is the legal name of your business?

Kamen Steel Industries Sdn. Bhd.

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

No.

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

No.

Since incorporation, the company has always operated under the legal name **Kamen Steel Industries Sdn. Bhd.**, and has not used any previous legal or trading names.

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

The current members of the Board of Directors are:

[CONFIDENTIAL]

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

No.

If yes, provide:

(a) A diagram showing the complete ownership structure and

Not applicable, since the company is **not part of a group**, the ownership structure is straightforward.

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

Not applicable, as the company does not have related or affiliated companies.

6. Is your company or parent company publicly listed?

No.

Kamen Steel Industries Sdn. Bhd. is a **privately held company** and is not publicly listed on any stock exchange.

If no, please provide:

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

[CONFIDENTIAL – OWNERSHIP DETAILS]

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.

Kamen Steel Industries Sdn Bhd, established in 1989, is a Malaysian manufacturer of welded steel mesh and related reinforcing steel products. Our core business activities include the manufacture of standard welded steel mesh in various specifications, the production of cut-to-size customised mesh based on engineering drawings, and the supply of associated steel products such as hard-drawn wire, steel bars, and security fencing panels.

Our welded mesh is supplied widely to the construction and infrastructure sectors. In the domestic market, sales are made primarily to traders and distributors, with customised mesh also supplied for project-specific applications where additional technical services, such as layout optimisation, cutting and preparation work, are required.

Our export sales consist of **standard prime welded steel mesh** supplied to overseas traders and distributors. These export products do not include any customised cutting, project optimisation or value-added services.

Our manufacturing facilities, located in Bukit Minyak Industrial Park, Penang, have an estimated annual production capacity of approximately [CONFIDENTIAL] metric tonnes, enabling us to supply both domestic and international markets efficiently.

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

Kamen Steel Industries Sdn. Bhd.

No. 873 MK 13, Jalan Perindustrian Bukit Minyak 1,

Kawasan Perindustrian Bukit Minyak,
14100 Bukit Mertajam, Pulau Pinang, Malaysia.

(b) sell in the domestic market

Kamen Steel Industries Sdn. Bhd.

(c) export to Australia and

Kamen Steel Industries Sdn. Bhd.

(d) export to countries other than Australia.

Kamen Steel Industries Sdn. Bhd.

9. Provide your company's internal organisation chart.

The company's internal organisation chart is attached as **Exhibit A-2-9**
[CONFIDENTIAL ATTACHMENT]

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

[CONFIDENTIAL]

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

Yes.

Soft copies of the relevant brochures and promotional materials are provided with this submission as **Exhibit A-2-11.**

A-3 General accounting information

1. What is your financial accounting period?

The financial accounting period of Kamen Steel Industries Sdn Bhd is from **1 January to 31 December.**

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

Yes.

The financial accounts of Kamen Steel Industries Sdn Bhd are audited by [CONFIDENTIAL].

3. What currency are your accounts kept in?

Our accounts are maintained in **Malaysian Ringgit (MYR).**

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

The company uses an **ERP system** [REDACTED] as its financial accounting system.

5. What is the name of your sales system?

The company uses the **sales module within its existing ERP system** to manage quotations, sales orders, customer records and invoicing. The company does not use a separate standalone sales system.

6. What is the name of your production system?

[CONFIDENTIAL – INTERNAL 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.

[CONFIDENTIAL – INTERNAL SYSTEM]

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

Our accounting practices are prepared in accordance with Malaysian Financial Reporting Standards (MFRS), which are the generally accepted accounting principles in Malaysia.

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

No.

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.

Kamen Steel Industries Sdn. Bhd. has provided the following financial statements in response to this request:

- Audited financial statements for the financial year ended 31 December 2023; and
- Audited financial statements for the financial year ended 31 December 2024.

These represent the **two most recently completed financial years** of the company.

No other related companies are involved in the production or sale of the goods subject to this investigation.

Refer to Exhibit A-4-1. [CONFIDENTIAL]

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.

The financial statements provided in response to A-4.1 for both financial years were audited by the company's external auditors.

The auditors issued unqualified audit opinions for both periods.
No audit management letters were issued, as there were no material weaknesses, deficiencies, or reportable matters identified that required formal communication by the auditors to management.

Accordingly, there are no audit management letters available to provide.

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

Not applicable.

The financial statements provided in A-4.1 are **audited financial statements**. As such, there are no unaudited financial statements, and the provision of tax returns and reconciliation between unaudited financial statements and tax returns is not required.

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.

Not applicable.

Kamen Steel Industries Sdn Bhd does not maintain separate profit centres. The company operates as a single integrated business, and financial performance is recorded on a consolidated basis. As such, separate profit and loss statements by profit centre are not maintained for the goods under consideration.

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.

The company's financial year runs from **1 January to 31 December**, while the investigation period is **1 October 2024 to 30 September 2025**.

Because these periods do not coincide, the company has provided income statements **generated directly from its accounting system** for both the most recent financial year and the full investigation period.

Documents provided

Period covered	Document
1 Jan 2024 – 31 Dec 2024	GL Income & Expenditure Statement as at 31/12/2024

Period covered	Document
1 Jan 2025 – 30 Sep 2025	GL Income & Expenditure Statement as at 30/09/2025
1 Oct 2024 – 30 Sep 2025 (Investigation Period)	GL Income & Expenditure Statement as at 30/09/2025

Both statements:

- are extracted directly from [REDACTED]
- clearly show company name, address, and accounting period, and
- reconcile with the company's general ledger.

These documents therefore fully satisfy the requirements of **A-4.5(a)**.

Refer: Exhibit A-4-5 [CONFIDENTIAL]

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

The company will provide its **trial balance in Excel format** extracted directly from its accounting system [REDACTED] for the following periods:

- 1 January 2024 – 31 December 2024 – monthly (most recent completed financial year); and
- 1 October 2024 – 30 September 2025 – monthly (investigation period).
- 1 October 2024 – 30 September 2025 – quarterly (investigation period).

These trial balances reconcile with the income statements and underlying general ledger records previously provided.

Refer: Exhibit A-4-6 [CONFIDENTIAL]

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

The company will provide its **full chart of accounts in Excel format** as extracted from its accounting system [REDACTED]

The chart of accounts reflects the account structure used to record all financial transactions of the company during the relevant periods.

Refer: Exhibit A-4-7 [CONFIDENTIAL]

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:

Kamen Steel manages [CONFIDENTIAL]

- (a) Marketing and advertising activities

Export enquiries are mainly generated through:

[CONFIDENTIAL – STRATEGY]

- (b) Price determination and/or negotiation process

Export pricing is determined [CONFIDENTIAL- SALES PROCESS]

- (c) Order placement process

- i. The customer submits a **Purchase Order (PO)**.
[CONFIDENTIAL- SALES PROCESS]

- (d) Order fulfilment process and lead time

[CONFIDENTIAL – SALES PROCESS AND INTERNAL CONTROL]

- (e) Delivery terms and process

Delivery is based on the agreed **INCOTERMS**, typically:

[CONFIDENTIAL- SALES TERM AND PROCESS]

- (f) Invoicing process

[CONFIDENTIAL- SALES PROCESS]

- (g) Payment terms and process

Export sales are conducted in the ordinary course of trade under commercially agreed payment terms [CONFIDENTIAL- PAYMENT 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

Yes. [CONFIDENTIAL]

- (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details

[CONFIDENTIAL]

- (c) How is the exchange rate determined in your accounting system and how often is it updated?

For accounting purposes, foreign currency transactions are recorded [CONFIDENTIAL – INTERNAL SYSTEM]

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.

No.

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

Kamen Steel Industries Sdn Bhd does [CONFIDENTIAL – PRICING POLICY]

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.

No.

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.

No.

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.

Yes.

During the investigation period, Kamen Steel Industries Sdn Bhd issued [CONFIDENTIAL]

Refer: Exhibit B-1-7 for the Details of Debit and Credit Notes [CONFIDENTIAL]

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?

No.

Kamen Steel Industries Sdn Bhd is **not** 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.

Not applicable.

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.

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".

The worksheets "**B-2 Australian sales**" and "**B-2.2 Australian sales source**" have been completed in the Commission's template and are provided in electronic format with all formulas retained.

All sales of the goods invoiced within the investigation period and exported to Australia are included.

Refer: ADC 1 – Exporter Questionnaire Spreadsheet [CONFIDENTIAL]

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.

The complete set of supporting documents for the two largest export invoices by value has been provided as attachments.

Refer: Exhibit B-3-1 [CONFIDENTIAL]

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.

All documents have been reconciled to the "B-2 Australian sales" worksheet and annotated accordingly.

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.
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.
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.

The worksheet "B-4 Upwards sales" has been completed and is provided in electronic format with all formulas retained.

All required source documents and working papers supporting the reconciliation are attached.

No balancing amounts have been used.

Refer: ADC 2 – Exporter Questionnaire Spreadsheet [CONFIDENTIAL]

**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.

During the investigation period, the company exported **welded steel reinforcement mesh sheets** to Australia. The goods are used for concrete reinforcement and fall within the scope of the goods under consideration.

The exported mesh is manufactured from **carbon steel wire rod**, drawn to the required diameter, arranged into a grid pattern, and **welded at the intersections**.

Key specifications of the exported goods are as follows:

- **Form:** Welded steel mesh sheets

[REDACTED]

During the investigation period, the company exported the following in-scope products to Australia:

[CONFIDENTIAL – SALES PRACTICE]

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.

The goods exported to Australia during the investigation period fall under the following Model Control Codes (MCCs), which correspond to the MCCs reported in the Australian sales listing in worksheet B-2:

P-N-A-L
P-N-A-XL
P-N-B-S
P-N-B-M
P-N-B-L
P-N-B-XL

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.

During the investigation period, the company sold **welded steel reinforcement mesh sheets** in the domestic Malaysian market. These goods include products that are **like goods** to the welded steel reinforcement mesh sheets exported to Australia, as they share the same essential physical characteristics, manufacturing process and end use as concrete reinforcement.

The domestic welded steel reinforcement mesh is manufactured from **carbon steel wire rod**, which is drawn to the required diameters, arranged into a grid pattern, and **electric-resistance welded** at the wire intersections. The goods are supplied in **sheet form**.

Physical and Technical Characteristics

The welded steel reinforcement mesh sold in the domestic market has the following characteristics:

Form: Welded steel mesh supplied in sheet form

[CONFIDENTIAL – SALES PRACTICE]

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.

The following Model Control Codes (MCCs) cover all like goods sold domestically and correspond to the MCCs reported in the domestic sales listing in worksheet **D-2**:

- P-N-A-S
- P-N-A-M
- P-N-A-L
- P-N-A-XL
- P-N-B-S
- P-N-B-M
- P-N-B-L
- P-N-B-XL
- P-N-C-L
- P-N-C-XL
- P-G-A-S
- P-G-A-M

C-3 Internal product codes

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

The company uses internal product codes within its ERP system for operational and inventory management purposes.

- (a) Provide details of the product or SKU coding system for the goods, such as a legend or key of the meaning for each code within the product or SKU code.

Kamen Steel maintains **internal SKU product codes** that are [CONFIDENTIAL – INTERNAL SYSTEM]

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

The mapping to the Model Control Codes (MCCs) for the purposes of this questionnaire was conducted [CONFIDENTIAL – INTERNAL SYSTEM]

- (c) Provide a table of showing the product or SKU codes for each MCC.

[CONFIDENTIAL – INTERNAL SYSTEM]

If no:

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

**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

Our domestic marketing activities focus mainly on direct customer engagement rather than public advertising. The Marketing Managers regularly visit customers to gather market information, strengthen relationships, introduce product updates and understand customer requirements.

Although we maintain a corporate website, domestic customers are already familiar with our brand as we are one of the pioneer welded mesh manufacturers in Malaysia. The majority of industry participants already know our company and products.

We also participate in relevant industry associations, where many of our domestic customers (traders and distributors) are members. This helps maintain visibility and credibility within the construction materials market.

(b) Price determination and/or negotiation process

Pricing is generally determined based on [CONFIDENTIAL – SALES AND PRICING POLICY]

(c) Order placement process

Once a customer decides to proceed, they typically send a purchase order (PO) via email or fax.

[CONFIDENTIAL – SALES PRACTICE]

(d) Order fulfilment process and lead time

After the sales order is created, the [CONFIDENTIAL – SALES AND PRODUCTION PROCESS]

(e) Delivery terms and process

Deliveries are usually arranged on [CONFIDENTIAL – SALES TERM AND INTERNAL PROCESS]

(f) Invoicing process

The invoice is generated [CONFIDENTIAL – SALES PRACTICE]

(g) Payment terms and process

Domestic sales are conducted in the ordinary course of trade on commercial terms.
The company's standard domestic payment terms include the following options, which are
[CONFIDENTIAL – PAYMENT TERMS]

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.

No.

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

Kamen Steel Industries Sdn Bhd does **not** use any formal, published or printed price lists or price extras lists for either domestic or export sales.

[CONFIDENTIAL – SALES PRACTICE]

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.

The majority of our domestic sales are [CONFIDENTIAL – SALES PRACTICE]

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.

Yes. [CONFIDENTIAL – SALES PRACTICE]

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.

Yes.

Kamen Steel Industries Sdn Bhd issued **credit notes and debit notes** during the period in relation to domestic sales of like goods.

Credit notes were issued for the following standard commercial reasons:
[CONFIDENTIAL – SALES PRACTICE]

All credit and debit notes are properly recorded in the ERP system and are fully auditable.

Supporting documents: D-1-6 – Details of Credit Notes During the Period; D1.6 – Details of Debit Notes During the Period (attached) [CONFIDENTIAL]

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?

No, we are not 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:

Not applicable, as we are not claiming any alternative date of sale.

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

D-2 Domestic sales listing

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

The transaction-by-transaction listing of all domestic sales of like goods during the period has been completed in worksheet "D-2 Domestic sales" and is provided in electronic format with formulas retained.

Refer: ADC 1 – Exporter Questionnaire Spreadsheet [CONFIDENTIAL]

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".

The worksheet "D-2.2 Domestic sales source" has also been completed, identifying the source of data used for each column.

Refer: ADC 1 – Exporter Questionnaire Spreadsheet [CONFIDENTIAL]

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.

The two largest domestic invoices by value during the period have been selected.

Refer: Exhibit D-3-1 [CONFIDENTIAL]

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.

The required supporting documents are attached and reconciled to the D-2 listing in accordance with D-3.2. [CONFIDENTIAL]

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.
2. Please provide all documents and worksheets, other than those in A-4, D-2 and F-2, required to complete the “B-4 Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.
 - For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:
 - Sales of the goods under consideration and other sales (e.g. non-goods or services)
 - Domestic and third country sales of the goods under consideration
 - If the documents include spreadsheets, all formulas used must be retained
 - There must not be any balancing amounts. All amounts must be supported by source documents.
3. For any amount in the “B-4 Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column D of the worksheet and
 - highlight or annotate the amount shown in the source document and
 - provide the account code and sub-account code (if applicable) at column E of the worksheet.

**SECTION E
DUE ALLOWANCE**

E-1 Credit expense

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

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

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

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

The average credit period for each Australian customer and each domestic customer of like goods has been calculated and is provided in **Exhibit E-1-1 – Average Credit Period**. [CONFIDENTIAL]

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?

Yes.

During the investigation period, the company maintained short-term borrowings and/or overdraft facilities denominated in its local currency.

[CONFIDENTIAL – FIGURES]

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?

Yes.

During the investigation period, the company held interest-earning deposits denominated in its local currency.

The **average interest rate earned during the period** was approximately [CONFIDENTIAL – FIGURES]

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?

No.

The company did not maintain any short-term borrowings or overdraft facilities denominated in the same foreign currency into which Australian customers make payment.

- (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?

During the investigation period, the company held interest-earning deposits denominated in that foreign currency.

The average interest rate earned during the period was [CONFIDENTIAL – FIGURES].

E-2 Packaging

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

For domestic sales of welded steel mesh, Kamen Steel uses simple industrial packaging designed for safe handling, loading and transportation. The packaging consists of:

[CONFIDENTIAL – INTERNAL PRACTICE]

No pallets, steel straps, or other specialized packaging materials are used for domestic mesh sales.

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

For export sales to Australia, the goods are packaged in a manner designed to ensure stability, protection and efficient handling during container loading and ocean transport.

Base Packaging (Individual Bundles)

[CONFIDENTIAL – INTERNAL PRACTICE]

Formation of Export Handling Units

[CONFIDENTIAL – INTERNAL PRACTICE]

Reinforcement and Handling Support

[CONFIDENTIAL – INTERNAL PRACTICE]

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

(a) Provide details of the differences

Yes, there are distinct differences between the packaging used for domestic sales and that used for export sales to Australia.

For domestic sales, welded steel reinforcement mesh is packaged using the company's standard domestic bundling method, which comprises:

[CONFIDENTIAL – INTERNAL PRACTICE]

This packaging is designed for local handling and short-distance road transportation. No steel strapping, pallets, frames, or additional reinforcement materials are used for domestic sales.

For export sales to Australia, [CONFIDENTIAL – INTERNAL PRACTICE]

(b) Calculate the weighted average packaging cost for each model sold on the domestic market

For domestic sales, packaging costs are incurred on a **uniform and pooled basis** and are not tracked or recorded by individual product model.

[CONFIDENTIAL – INTERNAL PRACTICE AND COSTING]

Detailed calculations and supporting schedules are provided in **Exhibit E-2-1**. [CONFIDENTIAL]

- (c) Calculate the weighted average packaging cost for each model exported to Australia

Packaging costs for export sales to Australia are not recorded by individual model in the ERP. Packaging is applied [CONFIDENTIAL – INTERNAL PRACTICE AND COSTING]

Refer: Exhibit E-2-1 [CONFIDENTIAL]

E-3 Delivery

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

Yes. The majority of domestic sales of like goods are **delivered to the customer** using either the company's own lorries or third-party transport providers. A smaller portion of sales is collected by customers on an **ex-works / own-collection** basis.

[CONFIDENTIAL – INTERNAL PRACTICE AND COSTING]

Refer: Exhibit E-3-1 for the detailed calculation of the domestic delivery per MT [CONFIDENTIAL]

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

Kamen Steel exports welded steel mesh to Australia under [CONFIDENTIAL – DELIVERY TERMS]

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?

For Australian sales where the delivery terms include transport to the Malaysian port of export, the inland transport amount reported in the B-2 sales listing is based on the actual cost incurred for each individual shipment.

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?

For Australian sales where the delivery terms include port handling or other Malaysian export charges, the amounts reported in the B-2 sales listing reflect the actual cost incurred for each individual shipment.

Each shipment is supported by specific invoices from the freight forwarder, and the actual invoiced amount is recorded directly against the corresponding B-2 transaction. No allocation or averaging methodology has been applied.

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?

For Australian sales where the delivery terms include ocean freight, the ocean freight amount in the B-2 sales listing is based on the actual freight invoice for each shipment.

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?

For Australian sales concluded on CIF terms, the marine insurance amount reported in the B-2 sales listing reflects the actual premium charged for the specific shipment.

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?

Not applicable.

The company does not sell to Australia on a Delivered Duty Paid (DDP) basis and does not incur Australian import duties, taxes, or inland delivery costs.

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.

No.

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?
 - How is VAT accounted for in your records in relation to sales of the goods and like goods?
 - Do you receive a VAT refund in relation to sales of the goods and/or like goods?
 - Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

No.

There are no differences in tax liability between domestic and export sales of the goods.

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

No.

Other than the selling expenses already captured in the domestic sales listing (D-2) and the SG&A disclosures (G-4), the company does **not incur any additional direct selling expenses** specifically attributable 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?

Kamen Steel does not incur any additional direct selling expenses for export sales to Australia apart from those already reflected in the agreed delivery terms and export requirements.

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)*¹ for more information.

Kamen Steel Industries Sdn Bhd does **not** consider that any additional adjustments are required to ensure a fair comparison between the export price and the normal value.

[CONFIDENTIAL]

Accordingly, no additional adjustments are claimed.

¹ 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.
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.

No.

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?

Not applicable.

- (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.

Not applicable.

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.

The worksheet "F-2 Third country sales" has been completed in the Commission's template and is provided in electronic format with all formulas retained.

Refer: ADC 1 – Exporter Questionnaire Spreadsheet [CONFIDENTIAL]

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".

The worksheet “**F-2.2 Third country sales source**” has been completed, identifying the accounting system and underlying records used as the source for each column in the “**F-2 Third country sales**” worksheet.

Refer: ADC 1 – Exporter Questionnaire Spreadsheet [CONFIDENTIAL]

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.

No.

There are no differences in sales to third countries that would 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.

The production of welded steel reinforcement mesh is a **continuous and standardised manufacturing process.**

[CONFIDENTIAL – PRODUCTION PROCESS]

(a) Raw Material Preparation

Receiving of wire rods

Wire rods of various diameters are received from approved suppliers and stored in the raw material area.

Cold rolling / drawing process

Wire rods are drawn through dies or rollers to reduce the diameter to the required specification and to achieve the necessary tensile strength and surface finish.

Scrap generated

[CONFIDENTIAL – PRODUCTION CONTROL]

By-product

- **Descaling powder** generated during the drawing descaling process.

(b) Wire Straightening and Cutting

Drawn wire is fed into straightening units and cut to the required lengths for longitudinal and cross wires according to mesh specifications.

Scrap generated

[CONFIDENTIAL – PRODUCTION CONTROL]

By-product

None.

Cutting and sizing

[CONFIDENTIAL – PRODUCTION CONTROL]

(c) Mesh Welding Process

Automatic wire feeding

- Longitudinal wires are fed continuously into the welding machine.
- Cross wires are fed at predetermined spacing intervals.

Electric resistance welding

- Wires are welded using electric resistance welding, with parameters set according to specification.

Continuous output and bundling

- Welded mesh exits continuously; once the target number of sheets is reached, bundles are prepared.

Scrap generated

- None at this stage.

[CONFIDENTIAL – PRODUCTION ARRANGEMENT]

(d) Service Centre Processing (If Required)

Certain orders require post-weld processing, including:

- shearing into smaller pieces,
- cutting into multiple pieces, or
- bending/forming to project requirements.

Scrap generated

- Minor trimming off-cuts, which are included in pooled scrap quantities.

(e) Storage and Loading

- Bundles are transferred by forklift to the finished goods warehouse.

Products Manufactured Using the Same Facilities

The production facilities are used to manufacture:

- standard welded mesh,
- project / cut-to-size mesh,
- custom-dimension mesh, and
- welded fencing products.

All products use the same wire preparation, straightening and electric resistance welding processes. There are no separate cost centres or dedicated production lines for fencing.

Scrap and By-Products

Scrap and by-products generated during production consist primarily of:

- Steel wire scrap arising from set-up, cutting and trimming activities; and
- descaling powder generated during the wire drawing process.

[CONFIDENTIAL – COSTING AND PRODUCTION PROCESS]

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.

No. None of our suppliers are related to our company. All suppliers of raw materials, consumables, production inputs, services and logistics operate independently and have no ownership, management or financial relationship with our company.

G-2. Cost accounting practices

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

Kamen Steel Industries Sdn Bhd's cost accounting system is based on actual costs.

2. If your company uses standard costs:
 - (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?
 - (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
 - (c) How were those variances allocated?
 - (d) Provide details of any significant or unusual cost variances that occurred during the period.

Not applicable.

Kamen Steel Industries Sdn Bhd does **not** use standard (budgeted) costs as the basis for its cost accounting system. All cost information reported in responses **G-3.1 and G-5.1** is based on actual costs incurred during the period, as recorded in the company's accounting records.

Accordingly:

- No standard costs were used in preparing the responses.
- No standard-to-actual variances exist.
- No variance allocation was required.
- No significant or unusual cost variances arose from standard costing practices.

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

Kamen Steel Industries Sdn Bhd applies a process costing system for its manufacturing operations.

Production of welded steel mesh is a continuous and standardised process, where costs are accumulated by production process rather than by individual job or customer order. Direct material costs, direct labour costs and manufacturing overheads are recorded based on actual costs incurred during the period and allocated to production output on a consistent basis.

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.

Kamen Steel Industries operates a functional cost-centre structure. Costs are accumulated and monitored at the departmental / functional level (e.g. raw materials, direct labour, manufacturing overhead, administration, selling & distribution, other operating expenses and financing costs).

The company uses an actual costing system. Manufacturing costs are pooled monthly and absorbed into finished goods inventory and cost of goods sold using the weighted-average inventory valuation method.

[CONFIDENTIAL – INTERNAL ACCOUNTING]

This cost structure is consistent with the company's internal management accounts and financial records.

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

Kamen Steel Industries Sdn Bhd's cost accounting system records production costs at a broad product and process level, rather than at an individual model, size or customer-specific level.

Costs are accumulated by production process and overall welded mesh production. The system does not maintain separate cost records for each individual mesh size, diameter, or specification.

Cost differences between products are primarily driven by material usage (weight) and production output, and are reflected through actual material consumption rather than model-specific cost tracking.

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

No.

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

No. Our company has not engaged in any start-up operations during the investigation period or the relevant years. All production facilities used for welded steel mesh were already fully operational and running at normal commercial capacity.

As there were no start-up operations, parts (a) and (b) are not applicable.

- (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.

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)?

Kamen Steel Industries Sdn Bhd values its inventories using the **weighted average cost method**.

Under the weighted average method, inventory costs are calculated based on the average cost of items available during the period, and this method is applied consistently for both financial reporting and cost accounting purposes.

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

Damaged or sub-standard materials generated during production are treated as production scrap.

[CONFIDENTIAL – INTERNAL PRACTICE]

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

Kamen Steel Industries Sdn Bhd does not produce any joint products or commercially significant by-products from the manufacturing of welded steel mesh.

Scrap generated during production is not inventoried or valued. Scrap materials are collected in scrap bins during normal production operations and are periodically disposed of to external scrap vendors when the bins are full.

The company does not maintain stock records, cost allocations, or inventory valuations for scrap. Any proceeds received from scrap disposal are incidental and are not used for inventory valuation or cost accounting purposes.

Accordingly:

- scrap is not valued as inventory,
- no by-products are recorded, and
- no joint products arise from the production process.

The cost associated with scrap generation is absorbed into overall production costs.

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

No. Our company does not receive any management fees or corporate allocations from any parent company or related company. All operating and administrative expenses are incurred and recorded directly by our 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.

The worksheet "**G-3 Domestic CTM**" has been completed in the Commission's template and provided in electronic format with all formulas retained. [CONFIDENTIAL]

Refer: ADC 2 – Exporter Questionnaire Spreadsheet

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".

The worksheet "**G-3.2 Domestic CTM Source**" has been completed, identifying the accounting and cost system sources used for each column of the "**G-3 Domestic CTM**" worksheet.

Refer: ADC 2 – Exporter Questionnaire Spreadsheet

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.

The worksheet "**G-4.1 SG&A Listing**" has been completed in the Commission's template and provided in electronic format with all formulas retained. [CONFIDENTIAL]

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.

The worksheet "G-4.2 Domestic SG&A Calculation" has been completed using the formulas provided by the Commission to calculate the unit domestic SG&A by MCC. [CONFIDENTIAL]

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.

The worksheet "G-4.3 Upwards SG&A" has been completed using the formulas provided and reconciles the SG&A amounts in G-4.1 to the company's trial balance and audited income statement. [CONFIDENTIAL]

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.

The requested general ledgers of all SG&A accounts, in Excel format, covering the period and the most recent financial year, are provided. [CONFIDENTIAL]

Refer: Exhibit G-4-4

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.

The requested worksheets have been completed in the Commission's template, with all formulas retained, and are provided in electronic format together with the supporting source documentation.

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".

The requested worksheets have been completed in the Commission's template, with all formulas retained, and are provided in electronic format together with the supporting source documentation.

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:

The Cost to Make (CTM) for domestic sales (G-3) and Australian export sales (G-5) has been prepared using the company's actual accounting records and production data. Costs are allocated on a consistent and reasonable basis that reflects how resources are consumed in production. [CONFIDENTIAL]

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.

The domestic model (by MCC) with the largest production volume during the period has been identified, and the requested allocation bridge worksheets from the company's normal cost accounting system to the cost reported for that model in G-3.1 have been provided. [CONFIDENTIAL]

Refer: Exhibit G-6-2

G-7 Major raw material costs

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

The major raw material used in the manufacture of welded steel mesh is **steel wire rods**.

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.

No. All raw materials, including steel wire rods, are purchased from independent third-party suppliers. Our company does not produce any raw materials internally, nor do we source raw materials from any subsidiary or related company.

As we do not manufacture any raw materials ourselves, the worksheet "G-7.2 Raw material CTM" does not apply.

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.

The calculation of the weighted average percentage of each raw material cost (as listed in G-7.1) as a proportion of total cost to make, using the domestic CTM data in "G-3 Domestic CTM", has been completed and is provided in the Commission's template with formulas retained.

Refer: Exhibit G-7-3 [CONFIDENTIAL]

Refer: ADC 2 – Exporter Questionnaire Spreadsheet

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

For each raw material identified in G-7.3 that individually accounts for 10% or more of the total cost to make, the worksheet "G-7.4 Raw material purchases" has been completed in the Commission's template, with all formulas retained, and is provided in electronic format.

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

A table listing the source of data for each column of the "G-7.4 Raw material purchases" worksheet is provided. [CONFIDENTIAL]

Refer: ADC 2 – Exporter Questionnaire Spreadsheet

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

For each raw material reported in G-7.4, the two largest purchase invoices by value and corresponding proof of payment are provided as attachments.

Refer: Exhibit G-7-6A [CONFIDENTIAL]

- (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.

The total value reported in "G-7.4 Raw material purchases" has been reconciled to the relevant purchase ledger(s) and/or trial balance accounts in the company's accounting system, and the reconciliation working papers and supporting documents are provided.

Refer: Exhibit G-7-6B [CONFIDENTIAL]

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.

No. None of the suppliers listed in "G-7.4 Raw material purchases" are related to the company.

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.

The worksheet "G-8 Upwards costs" has been completed in the Commission's template, with all formulas retained, and is provided in electronic format.

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.

All supporting documents and worksheets required to complete the “G-8 Upwards costs” worksheet, other than those already provided in A-4, G-3 and G-5, are attached.

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.

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.

Kamen Steel captures production quantities primarily through [CONFIDENTIAL – INTERNAL PRACTICE]

The production quantities reported in worksheets G-3 (Domestic CTM) and G-5 (Australian CTM) are derived from the [CONFIDENTIAL – INTERNAL PRACTICE]

Production quantities are not recorded by individual product models or MCC at the shopfloor or planning stage.

[CONFIDENTIAL – INTERNAL PRACTICE]

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.

Kamen Steel maintains a [CONFIDENTIAL – INTERNAL SYSTEM]

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

The differences between the production quantities reported in worksheet G-3 Domestic CTM and the sales volumes reported in worksheet D-2 Domestic Sales arise from normal inventory timing differences.

- (b) the production quantities reported at worksheet “G-5 Australian CTM” and the sales volumes reported at worksheet “B-2 Australian sales”.

The differences between the production quantities reported in worksheet G-5 Australian CTM and the sales volumes reported in worksheet B-2 Australian Sales arise from normal inventory timing differences.

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?

Kamen Steel determines its production volume and product mix primarily based on customer demand and confirmed sales orders, rather than on speculative production.

Determination of Production Volume

Production volumes are determined through continuous coordination [REDACTED]. The primary factors considered include:

- confirmed domestic and export sales orders
- current order backlog and delivery commitments
- finished goods inventory levels
- available production capacity and machine availability
- availability of raw materials and manpower
- maintenance schedules and operational constraints

Production volumes are reviewed and adjusted [CONFIDENTIAL – PRODUCTION CONTROL]

Determination of Product Mix

The product mix is driven mainly by the composition of customer orders on hand. [REDACTED] the product mix based on:

- specifications and quantities stated in customer orders
- delivery deadlines and customer priority
- optimisation of machine scheduling and material usage

Product mix decisions are reviewed [CONFIDENTIAL – PRODUCTION FLOW]

[CONFIDENTIAL – INTERNAL CONTROL]

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

The lead time required to adjust production volumes for welded steel mesh is relatively short and depends on [CONFIDENTIAL – INTERNAL CONTROL]

In general:

Short-term to medium adjustments [CONFIDENTIAL – LEAD TIME]

Small increases or decreases in production volume can typically be accommodated by rescheduling machine time, reallocating labour, and adjusting production priorities.

Large adjustments [CONFIDENTIAL – LEAD TIME]

More significant changes in production volume, [CONFIDENTIAL – LEAD TIME] to ensure sufficient raw material availability, revised production scheduling, and logistics coordination.

[CONFIDENTIAL – INTERNAL CONTROL]

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.

The worksheet “G-10 Capacity Utilisation” has been completed in the Commission’s template, with all formulas retained, and is provided in electronic format.

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

Production capacity has been determined on the basis of actual achievable output. For each year, capacity represents the maximum sustainable annual production level demonstrated under normal operating conditions.

[CONFIDENTIAL – PRODUCTION CAPACITY CALCULATION]

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

Yes, the company has warehousing facilities for the goods.

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

The warehousing facilities are located [CONFIDENTIAL – CAPACITY]

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

The monthly inventory maintained during the investigation period is based on month-end finished goods inventory records.

[CONFIDENTIAL – STOCK]

Refer: Exhibit G-10-3b for the detailed CLOSING STOCK TONNAGE (MT) [CONFIDENTIAL]

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

The average period of time that finished goods inventory is retained is calculated using the standard inventory days formula:

[CONFIDENTIAL – DAYS]

Refer: Exhibit G-10-3b for the detailed calculation of the AVERAGE PERIOD OF TIME INVENTORY [CONFIDENTIAL]

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.

[CONFIDENTIAL – CAPITAL & TECHNOLOGY]

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.

Production Facility Information

Production Facility Location:

No. 873 MK 13, Jalan Perindustrian Bukit Minyak 1,
Kawasan Perindustrian Bukit Minyak,
14100 Bukit Mertajam, Pulau Pinang, Malaysia

Date Facility Commenced Operations:

2004

The above facility is the only production plant operated by Kamen Steel Industries Sdn Bhd capable of producing the goods and their inputs.
No other plants or third-party facilities are used in the manufacture of the goods or their inputs.

[CONFIDENTIAL – CAPACITY]

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.

[CONFIDENTIAL - INVESTMENTS]

SECTION H
PARTICULAR MARKET SITUATION
Mandatory response for Chinese exporters

**SECTION I
DOMESTIC MARKET**

I-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

Kamen Steel's core business is the Malaysian domestic welded mesh market, which has always been the company's primary focus. The domestic market is closely tied to the performance of the construction, infrastructure and property development sectors.

Over the past five years, the Malaysian market has experienced several shifts:

- **Post-COVID recovery:** Market demand has remained stable but generally softer than pre-COVID levels. Construction activities resumed gradually, but the pace of recovery has been uneven due to project delays, labour shortages and tighter financing conditions.
- **Moderate demand growth:** While there has been a steady flow of infrastructure and commercial projects, overall consumption of welded mesh has grown modestly rather than rapidly.
- **Competitive environment:** The market remains highly competitive, with multiple domestic manufacturers supplying standard and custom mesh products. Price competition is common, and customers frequently compare suppliers based on reliability, quality, and delivery capability.
- **Shift toward value-added and project mesh products:** In recent years, more contractors and developers have preferred project mesh (cut-to-size (CTS)) mesh to reduce wastage and improve installation efficiency, resulting in increased demand for technical support and project-specific solutions.
- **Stable supply conditions:** The supply of welded mesh in Malaysia has remained sufficient to meet market needs, with no significant supply shortages or capacity constraints during the period.

Overall, the domestic market is characterised by steady but moderated demand, strong competition among local manufacturers, and increasing customer emphasis on service reliability, technical capability and consistent product quality.

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

Domestic demand for welded steel mesh is closely linked to construction and infrastructure activities. The main categories of customers in the Malaysian market are:

[CONFIDENTIAL – SALES STRATEGY]

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

The estimated proportion of sales revenue from each source of demand listed in Question 3(b) for the investigation period (1 October 2024 – 30 September 2025) is calculated based on the company's sales ledger and ERP records.

The breakdown is as follows:

[CONFIDENTIAL – INTERNAL SALES DATA]

- (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

Demand for welded steel mesh in Malaysia is closely linked to the performance and timing of construction and infrastructure activities. The main factors influencing consumption variability include:

- Construction sector slowdown: The overall pace of construction has been slower in recent years due to tighter financing conditions, labour shortages and delayed project commencements. This directly reduces the volume of welded mesh consumed.
- Delays or reductions in government and private projects: Public infrastructure projects and large private developments significantly influence demand. Any postponement, scaling down or cancellation of these projects leads to lower consumption in the market.
- Softness in the property market: Slower residential and commercial property launches reduce the need for reinforcement materials, including welded mesh, resulting in weaker demand.
- Raw material price volatility: Fluctuations in international steel prices affect purchasing behaviour. When prices rise sharply, some customers reduce or postpone stock purchases. Conversely, when prices fall, customers may increase buying, causing short-term variability in demand.
- General market sentiment: Broader economic conditions and confidence levels in the construction sector can lead to changes in order timing, stocking patterns and overall consumption levels.
- Shift in customer preferences: The increasing use of cut-to-size (CTS) mesh for efficiency and wastage reduction has influenced product mix, though not total consumption volume.

Overall, demand is driven by construction activity cycles, project timing, cost expectations and macroeconomic conditions, rather than seasonal or regulatory factors.

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

The Malaysian welded mesh market can be segmented along several dimensions:

1. Product Segmentation

- Standard welded mesh: Common reinforcement mesh supplied in fixed sizes and specifications
- Project (cut-to-size) mesh: Project-specific mesh produced according to engineering drawings to reduce wastage and improve installation efficiency.
- Custom mesh: Mesh produced for projects with unique specifications or dimensions.
- Other steel products: Some manufacturers also supply related reinforcement products such as steel bars, hard-drawn wires, bar-in-coil and fencing materials.

2. Customer Segmentation

[CONFIDENTIAL – SALES STRATEGY]

3. Geographic Segmentation

Demand patterns vary across regions due to differences in construction activity levels:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Each region has its own mix of infrastructure, property development and industrial projects, influencing the volume and type of mesh required.

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

The estimated proportion of the company's domestic sales revenue by market segment for the investigation period (1 October 2024 – 30 September 2025) is derived from the company's sales ledger and ERP records and reconciles to the total domestic sales revenue for the period.

[CONFIDENTIAL – INTERNAL SALES DATA]

The above proportions are derived from the completed D-2 sales listing for the investigation period.

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

In the Malaysian domestic market, welded steel mesh is supplied almost entirely by local manufacturers. Imported welded mesh is not commonly used for regular domestic consumption due to factors such as transportation cost, project requirements, quality certification practices, and the availability of established local producers.

As a result, there is no significant competition from imported welded mesh in Malaysia. Competition in the domestic market occurs almost exclusively among Malaysian producers, who compete based on:

- product quality and consistency
- pricing
- delivery reliability
- ability to supply standard and customised mesh
- technical support and service

Imported goods do not play a material role in determining domestic market prices or market behaviour.

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

In the domestic market, welded steel reinforcement mesh is marketed and distributed primarily through [CONFIDENTIAL – SALES STRATEGY]

1. Marketing approach

[CONFIDENTIAL – SALES STRATEGY]

2. Distribution channels

[CONFIDENTIAL – SALES STRATEGY]

Summary

[CONFIDENTIAL – SALES STRATEGY]

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

In relation to standard welded reinforcement mesh, the domestic Malaysian market is characterised by several commercial features that influence customer purchasing behaviour.

Price competition is an important factor. Customers routinely compare offers from multiple suppliers and negotiate prices based on prevailing market conditions and input cost movements, which is consistent with normal competitive commercial practice for commodity-type construction materials.

Product availability and delivery timing are also significant considerations. Many customers place strong emphasis on immediate stock availability and short delivery lead times, as purchases are often made to meet specific project schedules.

Purchasing patterns are predominantly transactional in nature. Domestic customers typically buy on a project-by-project or short-term basis rather than under long-term supply contracts, with order volumes and timing influenced by project requirements, cash flow considerations and short-term movements in raw material prices.

The domestic market therefore operates under normal competitive conditions, with purchasing decisions influenced primarily by price, availability and delivery timing.

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

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

[CONFIDENTIAL – SALES STRATEGY]

2. 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:

Official market share data for the Malaysian welded steel mesh market is not publicly published, and market participants generally do not disclose their volumes or market shares. However, based on general industry knowledge and publicly available information, the commercially significant participants can be described in broad terms as follows:

1. Manufacturers (Level of Trade: Manufacturer / Producer)

Malaysia has several welded mesh manufacturers operating independently. These companies typically focus on welded mesh production and may also produce complementary reinforcement products such as steel bars or hard-drawn wire.

Common characteristics of manufacturers in the domestic market:

- Commercially independent
- Primarily focused on production, not trading or contracting
- Compete mainly on price, product quality, and delivery reliability
- Market shares vary, but no single producer dominates the entire market

Due to the absence of official industry data, precise market share figures cannot be reliably estimated.

2. Traders and Stockists (Level of Trade: Wholesaler / Distributor)

Traders and stockists form the largest segment of the domestic distribution chain. They purchase in bulk from manufacturers and redistribute to contractors, subcontractors and hardware outlets.

Characteristics:

- Operate as independent distributors
- Not vertically integrated into production
- Compete based on stock availability, delivery speed, and credit terms
- Hold a significant share of domestic welded mesh movement

3. Hardware Shops and Smaller Retailers (Level of Trade: Retail)

These businesses supply smaller quantities of welded mesh to subcontractors and small or medium contractors.

Characteristics:

- Not integrated with manufacturers
- Compete based on location, convenience and quick delivery
- Represent a portion of the reseller segment but do not have large market shares individually

4. Contractors (Level of Trade: End Users)

Some large contractors procure welded mesh directly from manufacturers, usually for large infrastructure or commercial projects.

Characteristics:

- Not integrated into steel production
- Purchases are project-specific
- Account for a relatively small portion of total market volume

Market Shares (General Description)

Since no official industry statistics exist, individual participant market shares cannot be accurately quantified. However, the general structure is:

- **Manufacturers** collectively supply the domestic market
- **Traders/stockists** handle most distribution
- **Contractors** consume the final product

3. 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.

Based on our knowledge of the Malaysian welded mesh market, there are no commercially significant importers of welded steel mesh operating in the domestic market during the investigation period.

The Malaysian market for welded mesh is supplied almost entirely by local manufacturers, and imported welded mesh is not commonly used for regular domestic consumption. Any imports, if they occur, are very limited and project specific, and they do not have a noticeable impact on domestic supply, pricing or competition.

As we do not have access to official import statistics by company and we are not aware of any importer with a material or consistent market presence for welded mesh, we are not in a position to reliably identify specific importers or estimate their market shares. We also cannot accurately identify the countries of origin or levels of trade for such occasional imports.

To the best of our knowledge, local production, not imports, is the primary source of supply for welded mesh in the Malaysian domestic market.

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

The Malaysian domestic welded mesh market operates under a standard regulatory and commercial framework applicable to all construction material manufacturers. The main components are as follows:

1. Competition Policy

Malaysia practices an open and competitive market system.

Key regulatory body:

- **Malaysia Competition Commission (MyCC)**
Enforces the Competition Act 2010, which prohibits anti-competitive agreements and abuse of market dominance.
Welded mesh manufacturers operate independently and set prices based on market conditions.
There is no sector-specific competition regulation for welded mesh.

There are no government-controlled prices, subsidies, guidance pricing, or industry directives affecting welded mesh.

2. Taxation Framework

Welded mesh manufacturers are subject to normal Malaysian taxation laws, including:

- **Corporate Income Tax** (standard rates under the Income Tax Act 1967)
- **Sales and Service Tax (SST)** where relevant
- **Import duties** (not applicable to us as we purchase locally)
- **Standard customs requirements** for any exports

There are **no special taxes** specific to welded mesh products.

3. Product Standards and Certification

Welded steel mesh falls under general Malaysian construction material standards.

Relevant standards include:

- **SIRIM MS 145: Welded Steel Fabric for Reinforcement in Concrete**
- **Construction Industry Development Board (CIDB)** requirements for materials used in registered construction projects

These standards relate to product quality, wire diameter tolerance, spacing, tensile strength, and weld integrity.

Compliance is achieved through our internal quality control system and periodic testing.

There is **no government restriction** on the range of welded mesh products that can be produced. Manufacturers are free to produce standard mesh, custom mesh, project mesh, and related reinforcement products based on market demand.

4. Other Applicable Regulations

- **Department of Occupational Safety and Health (DOSH):** governs factory safety.
- **Department of Environment (DOE):** governs environmental compliance.
- **Local municipal authorities:** regulate building, zoning and business licensing requirements.

These regulations relate to operational and safety matters and do **not** dictate pricing, production levels or product range.

5. Availability of Regulation Copies

All the regulations mentioned above are **publicly available Malaysian laws and standards**.

We can provide copies upon request, but they are also accessible through:

- MyCC website
- Ministry of Finance / Royal Malaysian Customs
- SIRIM (for Malaysian Standards)
- DOSH and DOE websites

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

In Malaysia, entry into the welded steel mesh industry is generally open and subject to standard regulatory requirements applicable to manufacturing businesses. There are **no special entry**

restrictions, exclusive rights, or government allocation systems specific to welded mesh. The key considerations are as follows.

1. Resource Ownership

There are **no government-controlled resource allocations** for welded mesh production. Raw materials (steel wire rods) are freely available from local and international steel mills. New entrants can source materials through normal commercial arrangements.

2. Patents and Copyrights

Welded steel mesh is a **standard industrial product**, and its production is not governed by proprietary patents in Malaysia. There are **no intellectual property restrictions** preventing entry into the market.

3. Licensing Requirements

New entrants must obtain the standard licences required for operating a manufacturing facility in Malaysia, including:

- **Manufacturing Licence (where applicable)** under the Industrial Coordination Act 1975 (for companies exceeding statutory thresholds)
- **Business licensing** from local municipal councils
- **Environmental approvals** under the Environmental Quality Act 1974 (if required based on machinery or processes)
- **Workplace safety compliance**, including registration with the **Department of Occupational Safety and Health (DOSH)** under the Occupational Safety and Health Act 1994
- **Electricity supply approval** from Tenaga Nasional Berhad (TNB) for industrial usage

These are administrative requirements and do **not** restrict competition.

4. Barriers to Entry

The main barriers are **commercial**, not regulatory:

- Significant **capital investment** required for welding lines and processing machinery
- Need for **technical expertise** in maintaining and operating welding equipment
- Requirement to maintain **consistent product quality** to meet MS 145 standards
- Necessity for **strong distribution networks**, as traders and stockists play a major role in the market

These factors influence competitiveness but are not government-imposed restrictions.

5. Import Restrictions

There are **no prohibitions or quotas** on importing welded mesh or raw materials relevant to welded mesh production. Standard customs requirements under the **Customs Act 1967** apply.

Imports of welded mesh are uncommon for commercial reasons, not due to regulatory restrictions.

6. Government Regulations Affecting Entry

No specific government regulation restricts entry into the welded mesh industry. General regulations apply equally to all manufacturers, including:

- **Competition Act 2010 (MyCC):** prohibits anti-competitive behaviour but does not limit market entry
- **CIDB Act 1994:** governs construction sector registration; does not restrict manufacturing
- **SIRIM standards (e.g., MS 145):** relate to product quality but are not barriers to entry
- **Environmental and safety regulations:** apply to all industrial operators and do not restrict competitive entry

These regulations ensure safety and quality but **do not interfere with pricing, output levels or market access.**

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

I-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:

The domestic welded steel mesh market consists of several categories of reinforcement products used across civil, commercial and infrastructure projects. The range includes standard welded mesh, retail/custom mesh (non-standard but without technical involvement), and project (cut-to-size) mesh. The key characteristics are described below.

(a) Quality Differences

Quality variation exists in the broader market, but our company supplies prime-quality welded mesh across all product types.

(b) Price Differences

[CONFIDENTIAL – SALES STRATEGY]

(c) Supply / Availability Differences

[CONFIDENTIAL – SALES STRATEGY]

(d) Technical Support Differences

- Standard mesh does not require technical involvement.
- Custom mesh does not require technical drawing interpretation; customers simply provide the measurements.
- Project mesh requires technical drawings, engineering verification and detailed production planning.

(e) Private Labels / Customer Brands

Welded mesh is generally sold under manufacturer brand names. Private-label products are not common in this segment of the market.

(f) Generic Labels, Bar Marks and Plain Labelling

Standard mesh, custom mesh, and project mesh are generally sold with generic product descriptions (series, diameter, spacing, sheet size).

Our company applies bar marks on the welded mesh, which serve as:

- product identification
- production batch traceability
- quality assurance for customers

Bar marks are a common industry practice among established producers and help distinguish properly-identified products from unmarked alternatives.

(g) Premium Labels

There is no formal premium branding system in the welded mesh market. However, project mesh functions as a higher-value segment due to the technical work and specialised processes involved.

**(h) Product Segmentation
By Product Type**

- **Standard welded mesh**
- **Custom mesh** (non-standard dimensions, no technical support needed)
- **Project mesh** (technical drawings and engineering interpretation required)
- **Other reinforcement products** including hard drawn wire, bar-in-coil, steel bars and fencing

By Customer Type

[CONFIDENTIAL – SALES STRATEGY]

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

Welded steel mesh supplied in the domestic market is used across a wide range of construction and general fabrication applications. The end uses vary depending on the type of mesh purchased and the requirements of the final user. Common end uses include:

(a) Construction and Civil Engineering

This is the primary end-use segment for welded mesh. Applications include:

- concrete slab reinforcement
- wall, beam and column reinforcement
- precast concrete elements
- industrial flooring

- road pavements
- drainage and infrastructure works
- retaining walls and building foundations

Both standard mesh, custom mesh, and project are widely used in these applications.

(b) General Fabrication and Project Uses

Custom mesh is used for a broad range of fabrication and project applications, including:

- window grilles
- cages, trays and racks
- general metal fabrication work
- others

(c) Project (Cut-to-Size) Mesh Applications

Project mesh is used where engineering detailing are required, such as:

- large projects
- specially shaped reinforcement for structural elements
- areas requiring tight tolerances or irregular layouts

These products are typically used in projects that require technical drawings and engineering interpretation.

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.

Customer purchasing decisions in the domestic welded steel mesh market are shaped by typical commercial considerations such as price, supply availability, quality, and service reliability. These factors are consistent with normal competitive conditions in commodity construction materials markets. There are no abnormal purchasing patterns or distortive influences affecting buyer preferences.

[CONFIDENTIAL – Internal customer purchasing behaviour analysis]

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

There are no commercially significant substitutes that can directly replace welded steel mesh for the majority of its core applications in concrete reinforcement.

For most construction uses, welded mesh is specified in engineering drawings and is required for compliance with structural design standards. As a result, other products are not typically accepted as direct replacements.

While alternative reinforcement methods exist in the broader construction industry, these are not considered substitutes in a commercial sense because they serve different applications or are used only under specific circumstances. Examples include:

Reinforcing bars (rebar) used for different structural detailing; not a practical substitute for mesh where sheet reinforcement is required.

Fiber-reinforced concrete: used only for specialised applications and is not interchangeable with welded mesh in conventional construction.

These alternatives do not compete directly with welded mesh in normal building or civil engineering applications.

Therefore, for the domestic market, welded steel mesh has no meaningful or direct commercial substitute, and purchasing decisions are primarily between different suppliers of welded mesh rather than between different product types.

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.

Overall, there have been no major structural changes in consumer preferences for welded steel mesh over the past five years. The way the goods are used in construction remains the same. However, several market behaviours have become more noticeable due to changes in industry conditions:

[CONFIDENTIAL – Internal specific customer purchasing behaviour analysis]

I-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:

The domestic market is fundamental to the company's operations and has always been the primary focus of our business since establishment. Domestic sales consistently represent the majority of our revenue and operational activity.

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

[CONFIDENTIAL – INTERNAL SALES DATA]

Refer: Exhibit I-3-1

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

[CONFIDENTIAL – INTERNAL SALES DATA]

Refer: Exhibit I-3-1

All underlying records will be made available for verification.

In responding to question 1 please provide evidence supporting calculations.

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.

No. Our company is not the price leader for welded steel mesh in the domestic market.

The Malaysian welded mesh market is highly competitive and fragmented, with multiple local manufacturers operating independently. Prices are generally influenced by:

- fluctuations in raw material costs
- short-term supply and demand conditions
- individual commercial strategies of each producer
- customer negotiations and credit terms

There is no single company that consistently sets or leads market prices. Instead, prices adjust frequently based on prevailing steel wire rod costs and competitive pressures among all suppliers.

Because of the competitive and decentralised nature of the market, there is no identifiable price leader, and no manufacturer has the ability to materially influence or control market pricing.

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.

The company operates in the Malaysian domestic market under normal competitive conditions. Domestic pricing reflects prevailing market circumstances and standard commercial considerations typical of commodity construction materials markets.

The company does not engage in unusual or distortive pricing practices in the domestic market. Pricing outcomes are consistent with normal commercial behaviour.

[CONFIDENTIAL – Detailed internal pricing strategies, pricing decision criteria, and supporting internal commercial records]

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.

Domestic selling prices in the Malaysian market are determined in accordance with normal competitive commercial practices. Pricing reflects prevailing market conditions, customer requirements, and standard business considerations typical of commodity construction materials markets.

[CONFIDENTIAL – Internal pricing methodology, pricing decision processes, cost-referenced pricing considerations, and supporting commercial documentation]

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.

Domestic selling prices are reviewed in accordance with normal commercial practice, taking into account prevailing market conditions and transaction-specific factors typical of construction materials markets.

The company does not operate fixed or publicly issued price lists, and pricing adjustments are made in response to standard commercial developments.

[CONFIDENTIAL – Internal pricing review processes, pricing governance framework, decision-making roles, and proprietary commercial documentation]

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:

Domestic pricing decisions are influenced by a range of standard commercial factors typical of competitive construction materials markets, including market conditions, input costs, order characteristics, and logistical considerations.

[CONFIDENTIAL – Internal ranking of pricing decision factors, weighting methodology, and proprietary pricing strategy framework]

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?

Domestic selling prices reflect normal competitive market conditions in Malaysia. Pricing outcomes are influenced by prevailing commercial circumstances typical of commodity construction materials markets.

[CONFIDENTIAL – Internal analysis of price-cost relationships, margin variability, and proprietary profitability assessment]

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

[CONFIDENTIAL – Internal domestic discount and rebate policies, customer eligibility conditions, credit note practices, and price adjustment methodology]

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.

[CONFIDENTIAL – PRICING STRATEGY]

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.

[CONFIDENTIAL – Internal volume-related pricing considerations, transaction-level negotiation practices, and supporting commercial documentation]

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

[CONFIDENTIAL – Internal volume-related pricing considerations, sales practice]

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

[CONFIDENTIAL – SALES STRATEGY]

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

No.

(c) How frequently are sales contracts renegotiated?

[CONFIDENTIAL – SALES FACTOR]

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

[CONFIDENTIAL – SALES FACTOR]

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

[CONFIDENTIAL – SALES FACTOR]

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

[CONFIDENTIAL – sales factor, pricing strategy]

(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.

[CONFIDENTIAL – CUSTOMER LIST]

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.

Price lists

Kamen Steel Industries Sdn. Bhd. does not use any formal, published or operative price lists for domestic sales of welded steel reinforcement mesh during the investigation period.

[CONFIDENTIAL – SALES FACTOR, PRICING FACTOR]

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.

[CONFIDENTIAL – Internal product pricing differentiation framework, cost structure considerations, operational complexity analysis]

14. Do you tier or segment your domestic customers for the goods in terms of pricing? If yes, provide:

[CONFIDENTIAL – PRICING FACTOR]

(a) a general description of how this is done

[CONFIDENTIAL – PRICING FACTOR]

(b) list the factors that influence pricing differentiation in different tiers or segments and

[CONFIDENTIAL – PRICING FACTOR]

(c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

[CONFIDENTIAL – Internal pricing strategy and internal pricing decision framework]

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

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.

Not Applicable.

The company does not sell the goods to any related entities in the domestic market.

I-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.).

The company markets welded steel reinforcement mesh in the domestic market primarily through direct commercial engagement by its sales and marketing team, supported by long-standing relationships with traders, hardware shops and other resellers.

Marketing activities focus on relationship-based selling and include:

- regular customer visits and commercial discussions;
- provision of product and specification information; and
- ongoing communication via telephone, email and messaging platforms such as WhatsApp.

The company does not rely heavily on formal advertising. Sales are driven mainly by commercial reputation, reliability of supply and service performance.

Value proposition

The company's value proposition to domestic customers is based on the following key attributes:

- Reliable product quality – consistent manufacturing and adherence to agreed specifications;
- Availability and lead time performance – maintaining stock for standard mesh and strong production capability for timely fulfilment of orders;
- Competitive pricing – prices aligned with prevailing domestic market conditions;
- Customer service and responsiveness – effective communication, order coordination and after-sales support; and
- **Flexible supply capability** – ability to supply both standard mesh and non-standard cut-to-size mesh according to customer requirements.

These elements together support the company's established market presence and long-term commercial relationships in the domestic market.

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

No, our company does not conduct brand segmentation in the domestic market for welded steel mesh.

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.

Our company does not carry out formal advertising campaigns for welded steel mesh in the domestic market. The industry is relationship-driven, and most customers already know our company due to our long-standing presence and reputation.

Instead of traditional advertising, our promotional activities mainly consist of:

- Customer Visits and Relationship Management
Our sales and marketing team regularly visits traders, hardware shops and resellers to maintain relationships, provide product information, and promote our offerings.
- Participation in Industry Associations
We participate in relevant construction and steel-related associations, which strengthens our visibility and network within the industry.
- Website Presence
Our company maintains a website that provides basic product information and serves as a reference point for customers.

We have not carried out any mass advertising, printed advertisements, social media campaigns or large-scale marketing promotions 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.

[CONFIDENTIAL – Internal sales team structure, staffing allocation, and customer account management arrangements]

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.

[CONFIDENTIAL – Internal pricing guidance framework, pricing authority limits, and management approval controls]

**SECTION J
AUSTRALIAN MARKET**

J-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

Australia is a mature construction market where welded steel reinforcement mesh is widely used in residential housing, commercial and industrial buildings, and civil and infrastructure projects. Demand for the goods is closely linked to construction activity, building approvals, and infrastructure spending.

Over the past five years, the Australian construction sector has experienced periods of volatility following COVID-19, with fluctuations in residential building activity, rising input costs, labour constraints, and changes in interest rates. These factors have contributed to variable demand conditions for reinforcing products. The market remains competitive, with both domestically manufactured and imported welded steel mesh supplying Australian demand.

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

Demand for welded steel mesh in Australia primarily comes from:

- Importers, traders, and steel distributors/stockists, who supply the downstream construction market
- Construction contractors and end users, including residential, commercial, and civil works
- Internal use by fabrication or processing facilities

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

Based on the company's sales records for the investigation period (1 October 2024 – 30 September 2025), the estimated proportion of the company's sales revenue to Australia by source of demand is as follows:

[CONFIDENTIAL – PERCENTAGE]

(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

Demand for welded steel mesh in Australia is influenced by:

- Residential and non-residential construction cycles
- Infrastructure investment levels and project timing
- Seasonal construction patterns and weather conditions
- Government regulations and building standards
- Input cost volatility (steel raw materials, freight, energy, labour)
- Availability and lead times of locally manufactured and imported products
- Trade and regulatory developments affecting imports

These factors contribute to periodic fluctuations in demand rather than long-term structural decline or growth.

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

The Australian market can be segmented by:

[CONFIDENTIAL – CUSTOMER SEGMENTATION]

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

Based on the Australian sales data for the investigation period, the distribution
[CONFIDENTIAL – REVENUE AND PERCENTAGE]

Source

These proportions are calculated from the company's Australian sales records for the investigation period and are supported by B-2 Australian sales listing. [CONFIDENTIAL]

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

Australian-manufactured welded steel mesh and imported mesh compete primarily on:

- **Price competitiveness**
- **Availability and delivery lead times**
- **Compliance with Australian standards and certification requirements**
- **Consistency of supply and service reliability**

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

In Australia, welded steel mesh is marketed and distributed primarily through independent commercial intermediaries, including:

- importers and trading companies;
- steel distributors and stockists supplying the construction sector; and
- manufacturers that use welded steel mesh as an input for further processing, such as precast concrete and related construction product manufacturers.

[CONFIDENTIAL – DISTRIBUTION]

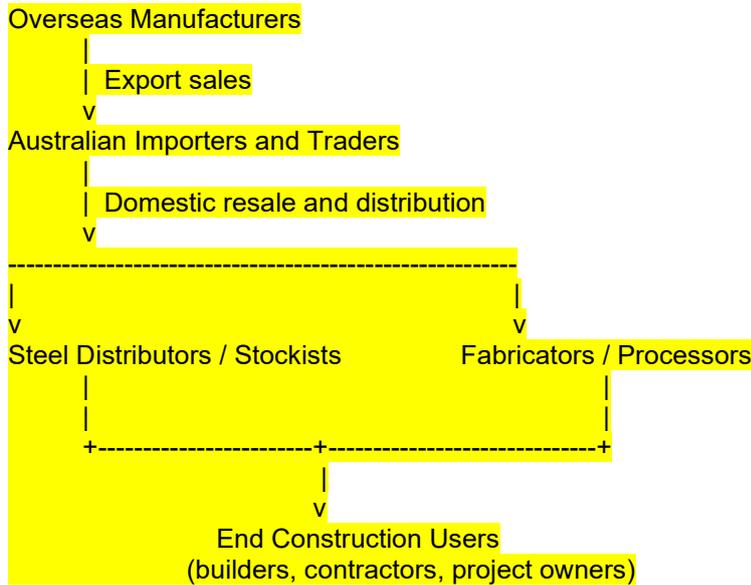
- (i) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.

Other factors that materially influence the market for welded steel mesh in Australia include:

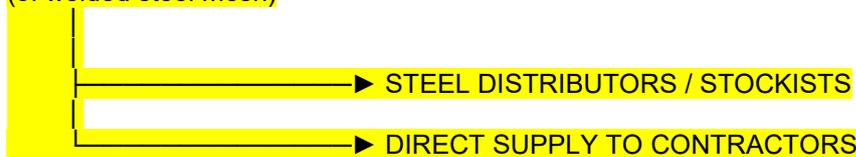
- International freight costs and vessel availability
- Port congestion and logistics constraints
- Certification and compliance requirements
- Market uncertainty associated with trade remedy investigations

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

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



DOMESTIC AUSTRALIAN MANUFACTURERS
(of welded steel mesh)



In addition to imported products, welded steel mesh is also manufactured locally in Australia and supplied through similar distribution channels.

Explanation of the diagram

- Overseas manufacturers supply welded steel mesh into Australia either directly to Australian importers/traders or indirectly via trading companies.
- Importers and traders act as the primary entry point for imported mesh and are responsible for customs clearance, compliance, and local distribution.
- Steel distributors/stockists purchase mesh from importers or domestic manufacturers and supply contractors on a just-in-time or stock basis.
- Factories/processers, purchase mesh as an input for further processing before supplying construction projects.
- Construction contractors are the final users of the goods in construction works.

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.

The Australian market for welded steel reinforcement mesh consists of domestic manufacturers, importers and traders, distributors and stockists, and downstream industrial users.

The descriptions below are based on publicly available information, including the Anti-Dumping Commission's published material in Case 692, and the company's commercial experience in supplying customers in the Australian market during the investigation period. Accordingly, any market share descriptions are qualitative and indicative only.

1. Domestic Australian manufacturers

Representative example: InfraBuild (Australia)

- **Level of trade:** Manufacturer; distributor
- **Description:** InfraBuild is a major Australian producer of welded steel reinforcement mesh and supplies the domestic market through integrated manufacturing and distribution operations.

2. Importers and traders

Australian-based importers and traders

- **Level of trade:** Importer / trader
- **Description:** A number of Australian-based companies import welded steel mesh and supply distributors, stockists, precast concrete manufacturers and, in some cases, construction sites.

Offshore trading companies

- **Level of trade:** Trader / intermediary

3. Distributors and stockists

Steel distributors / stockists

- **Level of trade:** Distributor / stockist
- **Description:** These entities purchase welded steel mesh from domestic manufacturers and importers and maintain inventory to service construction customers and projects.

4. Downstream industrial users

Precast concrete manufacturers and other processors

- **Level of trade:** Industrial user / processor

5. The company's position

- **Level of trade:** Overseas manufacturer / exporter

Important note on sources

Market structure descriptions and references to import shares by country are derived from the Anti-Dumping Commission's published material in Case 692 and the company's commercial experience.

All market share references are therefore indicative only.

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.

The company does not have access to comprehensive market-wide data identifying all commercially significant importers of welded steel reinforcement mesh in Australia or their respective market shares.

The company's knowledge is limited to its own commercial relationships and publicly available information.

According to the Commission's published material in Case 692, imports account for a minority of total Australian consumption, with China being the largest source of imported welded steel mesh and Malaysia representing a smaller share of total imports.

Based on the company's commercial experience and public information, the commercially significant participants in the import segment of the Australian market include:

- Australian-based importers and trading companies that source welded steel mesh from overseas and supply distributors, stockists and industrial users; and
- offshore trading companies that supply welded steel mesh to Australian customers.

The company is not able to reliably estimate importer-specific market shares, as such information is not publicly available and falls outside the company's direct knowledge.

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

The Australian market for welded steel reinforcement mesh operates within a well-defined regulatory framework that governs competition policy, taxation, product standards, and the permitted range and use of goods. The key elements are outlined below.

Competition policy

Competition in the Australian market is governed by the Competition and Consumer Act 2010 (Cth), which is administered by the Australian Competition and Consumer Commission (ACCC).

This legislation promotes competitive markets and prohibits anti-competitive conduct such as cartel behaviour, misuse of market power, and misleading or deceptive conduct. The competition framework applies equally to domestically manufactured and imported welded steel mesh.

Trade remedy measures, including anti-dumping and countervailing duties, are administered separately under the Customs Act 1901 and associated legislation by the Anti-Dumping Commission.

Taxation

Imported welded steel mesh is subject to Australian customs and taxation requirements, including:

- Customs duties, where applicable (including any anti-dumping or countervailing duties if imposed); and
- Goods and Services Tax (GST)

Product standards and certification

Welded steel reinforcement mesh supplied to the Australian market is required to comply with relevant Australian Standards, including standards relating to reinforcing steel products. In practice, many customers require compliance with the Australian Certification Authority for Reinforcing Steel (ACRS) scheme. ACRS certification provides independent verification that reinforcing products meet specified Australian Standards and is widely required by builders, engineers, and government or infrastructure projects.

Range of goods and technical requirements

The range of welded steel mesh permitted in the Australian market is influenced by:

- Australian Standards specifying acceptable physical characteristics, dimensions, and performance requirements;
- Engineering and design requirements set by project specifications; and
- Certification or compliance requirements imposed by customers or regulatory bodies.

While standard mesh products are commonly traded, project-specific or custom mesh may also be supplied provided they meet applicable technical and regulatory requirements.

Regulatory documents

The regulations and frameworks described above are set out in publicly available legislation and standards, including:

- Competition and Consumer Act 2010 (Cth)
- Customs Act 1901 (Cth) and associated anti-dumping legislation

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.

Entry into the Australian market for welded steel reinforcement mesh is open in principle but subject to significant commercial, technical and regulatory requirements.

The principal entry considerations for new participants include the following:

1. Capital investment and resource ownership

2. Technical standards and certification requirements

Products supplied into the Australian market must comply with applicable Australian Standards and certification requirements.

3. Licensing and regulatory compliance

Participants must comply with relevant Australian regulatory regimes, including:

- customs and importation requirements administered by the Australian Border Force;
- product conformity and safety obligations under Australian consumer and construction laws; and
- state and territory building and construction regulations governing the use of reinforcing materials.

4. Import conditions and trade measures

Imports are subject to:

- normal customs clearance requirements;
- applicable duties, taxes and border charges; and
- trade remedy measures where in force under Australian law.

These conditions influence the commercial viability and timing of market entry for foreign suppliers.

5. Commercial barriers and market structure

Beyond formal regulation, new entrants face significant commercial barriers, including:

- establishing customer relationships and distribution networks;
- achieving scale economies necessary to compete on price;
- managing freight costs, shipping availability and logistics constraints; and
- building credibility with Australian customers regarding product quality and compliance.

J-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.

The company's understanding of the Australian market is based on its direct commercial experience as an exporter and on information received from its customers. The company does not claim full visibility over all downstream market segments in Australia.

General description of the goods

The Australian market for welded steel reinforcement mesh consists primarily of standardised construction products supplied by domestic Australian manufacturers and overseas exporters, including goods produced by the company.

Range of goods and product characteristics

The company supplies welded steel mesh in standard sizes and specifications commonly used in construction. Sales to Australia consist primarily of products with established and repeatable specifications.

Quality and standards

Australian customers place strong emphasis on product quality and compliance with applicable standards and certification requirements.

Customers consistently expect reliable quality, conformity with technical requirements, and dependable delivery performance.

Technical support and delivery considerations

From the company's commercial experience, customers value timely communication, dependable lead times, and the ability to coordinate deliveries with their project schedules.

Products requiring particularly short lead times or frequent design interaction are more challenging to supply from offshore due to production scheduling and shipping transit times.

Pricing

Pricing in the Australian market reflects product specifications, freight and logistics costs, certification and compliance obligations, delivery requirements, and prevailing market conditions.

Branding and labelling

Branding plays a limited role in purchasing decisions for welded steel mesh.

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

Welded steel reinforcement mesh in Australia is used as a reinforcing material in concrete construction across residential, commercial, industrial and civil applications, regardless of whether the goods are domestically produced or imported.

Based on the company's commercial experience and information received from customers, the main end uses include:

- Residential construction, such as house slabs, footings, driveways and pavements;
- Commercial and industrial construction, including warehouses, factories and floor slabs;
- Civil and infrastructure works, including pavements, drainage structures and other concrete-based applications; and
- Precast concrete manufacturing, where welded steel mesh is used as an input for concrete panels, pipes and related products.

The goods supplied into the Australian market are generally used in applications with established technical and quality requirements and are selected based on suitability for the intended construction purpose, delivery reliability and overall commercial considerations.

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.

The company's understanding of purchaser preferences in the Australian market is based on its commercial experience and customer feedback. The company does not claim comprehensive visibility over all downstream purchasing behaviour in Australia.

Based on this experience, the key product attributes influencing purchasing decisions are generally as follows, in approximate order of importance:

1. Compliance with technical and quality requirements
2. Delivery reliability and lead time
3. Price and overall commercial competitiveness
4. Availability of supply
5. Service reliability and communication
6. Logistics and shipment flexibility

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

There are no commercially significant direct substitutes for welded steel reinforcement mesh in the Australian market for most of its intended applications.

Welded steel mesh performs a specific structural function in reinforced concrete construction, and alternative materials generally do not provide the same combination of strength, durability, and compliance with Australian Standards.

In cases, reinforcing bars (rebar) or other reinforcement arrangements may be used as an alternative to welded mesh, depending on design and engineering requirements. However, these are functional alternatives rather than direct substitutes, and their use depends on project design, labour considerations, and cost, rather than serving as interchangeable products in the market.

Accordingly, welded steel reinforcement mesh does not face significant substitution from other products on a market-wide basis.

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

Welded steel reinforcement mesh is used together with a range of complementary products and services in the Australian construction market. While these items do not replace welded mesh, they are commonly used alongside it in reinforced concrete applications.

Commercially significant complements include:

- Concrete
- Reinforcing steel bars (rebar)
- Concrete accessories, such as bar chairs, spacers, and tying wire, which support correct placement of mesh during construction; and
- Precast concrete products

These complementary products and services are widely available in the Australian market and are essential for the effective use of welded steel reinforcement mesh in construction projects.

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.

The company's understanding of developments in the Australian market is based on its commercial experience as an exporter and on information received from customers.

Based on this experience, the following developments have been observed over the past five years:

1. Continued construction activity

Australia has experienced sustained levels of residential, commercial and infrastructure construction. This has supported ongoing demand for concrete reinforcement products, including welded steel mesh.

2. Continued emphasis on quality and compliance

Customers consistently place strong importance on compliance with applicable technical and quality requirements for reinforcing materials.

3. Ongoing price sensitivity

The welded steel mesh market remains highly competitive, particularly for standardised products. Buyers continue to be price-sensitive, subject to meeting quality, delivery and technical requirements.

4. Emerging sustainability considerations

Across the broader construction and steel sector, sustainability considerations have become more visible, including interest in recycled content and lower-carbon production methods.

J-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:

The importance of the Australian market to the company's operations is assessed on the basis of the investigation period as a whole.

While sales to Australia fluctuated during the period, the proportions below reflect the aggregate position for the full investigation period, which provides a more representative view of the market's overall importance.

- (a) The proportion of your company's sales revenue derived from sales of the goods in Australia and

During the investigation period, sales of the goods to Australia [CONFIDENTIAL – REVENUE, MARKET SHARE CALCULATIONS AND SUPPORTING FINANCIAL SCHEDULES]

Refer: Exhibit J-3-1 [CONFIDENTIAL]

- (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.

(b) Proportion of profit derived from Australia

The company does not maintain profit and loss accounts segmented by market or destination. [CONFIDENTIAL – DETAILED FIGURES, ALLOCATION CALCULATIONS FINANCIAL SCHEDULES AND SUPPORTING ACCOUNTING RECORDS]

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.

The company is not a price leader for welded steel reinforcement mesh in the Australian market.

The company supplies goods as an overseas exporter to independent Australian importers and traders and does not control, set, or influence downstream resale prices in Australia.

Based on the company's commercial experience and publicly available information, pricing in the Australian market is primarily influenced by large domestic Australian manufacturers with established production facilities and distribution networks. These domestic producers have the greatest ability to influence prevailing market price levels through their scale of operations, local cost structures, and responsiveness to changes in supply and demand.

In practice, prices established by domestic producers are commonly used as commercial reference points by distributors, stockists and importers, with imported products competing around those prevailing market levels on a transactional basis, taking into account factors such as freight costs, lead times and customer requirements.

Given the company's limited market share and the absence of any control over downstream pricing in Australia, the company does not have the ability to lead prices in the Australian 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 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.

Nature of the company's pricing in Australia

The company sells welded steel reinforcement mesh into Australia in a competitive market environment. Export prices are established in accordance with prevailing commercial conditions and standard business practices.

The company does not control downstream resale pricing in Australia. Export sales are conducted on a normal commercial basis.

Pricing strategies applied (ranked by importance)

[CONFIDENTIAL – Internal export pricing strategy, pricing governance framework, and commercial decision methodology]

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.

Selling prices for welded steel reinforcement mesh supplied to the Australian market are determined in accordance with normal commercial practice in a competitive export environment.

[CONFIDENTIAL – Internal export pricing governance framework, pricing decision methodology, approval controls, and commercial pricing guidelines]

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.

Frequency of price review

Australian export prices are reviewed periodically as part of normal commercial practice, rather than on a fixed schedule. Reviews occur in response to general changes in prevailing commercial conditions.

[CONFIDENTIAL – Internal export pricing review procedures, commercial decision framework, and approval controls]

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]

Pricing decisions for sales to Australia reflect a combination of standard commercial factors typical of international trade in construction materials.

These factors may include market conditions, transaction characteristics, and general business considerations. No single factor operates in isolation, and pricing outcomes reflect overall prevailing commercial circumstances rather than a fixed hierarchy of influences.

The company does not apply unusual, distortive, or non-commercial pricing practices in the Australian market.

[CONFIDENTIAL – Internal export pricing factor rankings, commercial weighting framework, and pricing decision methodology]

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.

Relationship between selling price and costs

Selling prices for welded steel reinforcement mesh exported to Australia are determined in

[CONFIDENTIAL – Internal price-cost assessment framework, export cost structure considerations, commercial pricing methodology, internal profitability assessment approach, margin management framework, and supporting financial records]

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.

Refer answer at B-1-7

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

[CONFIDENTIAL – PRICING FACTOR]

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.

[CONFIDENTIAL – PRICING FACTOR]

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

[CONFIDENTIAL – PRICING FACTOR]

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

[CONFIDENTIAL – PRICING FACTOR]

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

The company does not offer exclusivity contracts.

- (c) How frequently are sales contracts renegotiated?

[CONFIDENTIAL – PRICING FACTOR]

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

[CONFIDENTIAL – PRICING FACTOR]

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

[CONFIDENTIAL – PRICING FACTOR]

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

[CONFIDENTIAL – PRICING FACTOR]

- (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.

[CONFIDENTIAL – PRICING FACTOR]

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.

The company does not maintain or use published price lists for welded steel reinforcement mesh in the Australian market.

[CONFIDENTIAL – PRICING FACTOR]

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.

[CONFIDENTIAL – Internal product classification criteria, pricing differentiation methodology, cost structure considerations]

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

[CONFIDENTIAL – PRICING FACTOR]

- (b) list the factors that influence pricing differentiation in different tiers or segments and

[CONFIDENTIAL – PRICING FACTOR]

- (c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

Cost considerations are taken into account in [CONFIDENTIAL – PRICING FACTOR]

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

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.

The company does not sell welded steel reinforcement mesh to any related entities in Australia.

All Australian sales during the investigation period were made to independent, unrelated customers on an arm's-length basis.

J-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.).

The company does not engage in active or consumer-facing marketing activities in the Australian market.

[CONFIDENTIAL – MARKETING STRATEGY]

Value proposition

The company's value proposition to Australian customers is based on:

- Competitive pricing
- Compliance with Australian Standards and ACRS requirements,
- Consistent product quality
- Reliable supply

[CONFIDENTIAL – MARKETING STRATEGY]

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.

The company does not conduct brand segmentation in the Australian market for welded steel reinforcement mesh.

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.

The company has not undertaken any advertising or promotional campaigns for welded steel reinforcement mesh in the Australian market during the past five years, including the investigation period.

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.

[CONFIDENTIAL – 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.

Pricing for sales to Australia is [CONFIDENTIAL – SALES PRACTICE]

EXPORTER'S DECLARATION

I hereby declare that **Kamen Steel Industries Sdn Bhd** (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 : [REDACTED]
Signature :
Position in
Company : [REDACTED]
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)
CPT	the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CIP	carriage paid to 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.