



Australian Government
Department of Industry,
Science and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 691

Product: Aluminium Windows and Doors

From: The People's Republic of China

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

Response due by: 16 February 2026

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.

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting an investigation into aluminium windows and doors exported to Australia from the People's Republic of China.

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 Aluminium windows and doors is dumped. The commission will also use this information to determine whether aluminium windows and doors has been in receipt of countervailable subsidies over the period.

The Commission will collect and use information in accordance with its [Collection and Use of Information Policy](#).

If you do not manufacture the goods

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

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

What happens if you do not respond to this questionnaire?

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

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

Extension requests

If you require a longer period to complete your response to this exporter questionnaire, you must submit a request to the commission, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date. A request for extension will be rejected if received after the due date.

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

- the commission's responsibility to conduct the case in a timely and efficient manner
- the reasons why you could not provide a response within the whole period and not only the period remaining between the request and the due date
- ordinary business practices or commercial principles
- the commission's understanding of the relevant industry
- previous correspondence and previous dealings with your company and
- information provided by other interested parties.

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

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

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

Submitting a response to the exporter questionnaire

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

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

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

Confidential and non-confidential responses

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

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

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

- Notify the commission
- Delete the information from your system and
- Refrain from using, sharing or retaining the information in any way.

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

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

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

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

Verification of the information that you supply

The commission may wish to conduct a verification of your questionnaire response for completeness, relevance and accuracy of the information to your company's records.

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

The verification may include Commission staff visiting your company to conduct on onsite verification. Any onsite verification typically commences approximately 2 to 4 weeks after the due date of the

response to the exporter questionnaire. To assist with the planning of a verification, please contact the commission as soon as possible for a potential verification date to be scheduled.

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

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

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

A report will be prepared following the verification, which details the outcomes of the verification. This report will be placed on the public record and may include the publication of the preliminarily assessed dumping margin and subsidy margin. The commission considers that the dumping margin and subsidy margin 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	A	<input checked="" type="checkbox"/>
Section B Export sales to Australia	B	<input checked="" type="checkbox"/>
Section C Exported goods & like goods	C	<input checked="" type="checkbox"/>
Section D Domestic sales	D	<input checked="" type="checkbox"/>
Section E Due allowance	E	<input checked="" type="checkbox"/>
Section F Third country sales	F	<input checked="" type="checkbox"/>
Section G Cost to make and sell	G	<input checked="" type="checkbox"/>
Section H Particular market situation	H	<input checked="" type="checkbox"/>
Section I Countervailing	I	<input checked="" type="checkbox"/>
Section J Domestic Market	J	<input checked="" type="checkbox"/>
Section K Australian Market	K	<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"/>

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G-5.2 Australian CTM source	<input checked="" type="checkbox"/>
G-7.2 Raw material CTM	<input type="checkbox"/>
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>
G-8 Upwards costs	<input checked="" type="checkbox"/>
G-10 Capacity Utilisation	<input checked="" type="checkbox"/>
I-1 Company Turnover	<input checked="" type="checkbox"/>
I-3 Income Tax	<input checked="" type="checkbox"/>
I-4 Grants	<input checked="" type="checkbox"/>

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

Aluminium windows and doors, whether fully or partially assembled, including their frames, panels, and sashes, with or without glass, whether or not thermally broken, whether or not including hardware, up to the following dimensions:

- *for window assemblies or partial assemblies (including window frames, panels and sashes), up to and including 3.0 metres high and up to and including 4.0 metres wide; and*
- *for door assemblies or partial assemblies (including door frames, panels and sashes), up to and including 3.0 metres high and up to and including 7.0 metres wide.*

Further Information

“Fully assembled” refers to a complete window or door unit in which all frames and the applicable panels and/or sash are joined together to form a complete and functional window or door assembly, whether or not glazed, whether or not thermally broken, whether or not including hardware.

“Partially assembled” refers to a fabricated aluminium frame, panel, or sash assembly that is supplied individually or connected to other frame, panel, or sash assemblies, where the combination does not yet form a complete window or door unit, whether or not glazed, whether or not thermally broken, whether or not including hardware.

Exclusions

Excluded are curtain wall products

Model Control Code

Details of the model control code (MCC) structure for the goods are detailed in the table below. Export sales data (Section B-2), domestic sales data (Section D-2) and cost to make and sell data (Section G-3, G-4 & G-5) submitted in this response must follow this MCC structure. At a minimum, the data must report sales and cost data separately for each of the mandatory MCC categories identified by the commission.

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
1	Door/Window	Door	D	Mandatory	Mandatory
		Window	W		
2	Assembly	Fully Assembled	FA	Mandatory	Optional
		Partially Assembled	PA		
3	Type	Sliding window	ASW	Mandatory	Optional
		Fixed window	AFW		
		Awning window	AAW		
		Sliding door	ASD		
		Stacker door	ASTD		
		Louvre window	ALW		
		Other door	AOD		
		Other window	AOW		
4	Height millimetres (mm)	Up to and including 1,543	H1	Mandatory	Optional
		>1,543 up to and including 1,820	H2		

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		>1,820 up to and including 2,100	H3		
		>2,100 up to and including 2,400	H4		
		>2,400 up to and including 3,000	H5		
5	Width (mm)	Up to and including 1,210	W1	Mandatory	Optional
		>1,210 up to and including 1,810	W2		
		>1,810 up to and including 2,410	W3		
		>2,410 up to and including 3,610	W4		
		>3,610 up to and including 7,000	W5		
6	Thermal break	Thermally broken	TB	Mandatory	Optional
		Not thermally broken	NTB		
7	Glaze	Single	SG	Mandatory	Optional
		Insulated unit	IG		
		Other material	OM		
		No glass	NG		
8	Coating	Coated	C	Mandatory	Optional
		Not coated	NC		
		Other material	OM		
		No glass	NG		
9	Safety	Toughened	TG	Mandatory	Optional
		Laminated	LM		
		Float	F		
		Other material	OM		
		No glass	NG		

In constructing a MCC, use a "-" between each category. For example: W-FA-AAW-H2-W3-NTB-IG-NC-F is a fully assembled awning window of height greater than 1,543mm and up to and including 1,820mm and width greater than 1,810mm and up to and including 2,100mm, not thermally broken, with insulated unit glaze, not coated and containing float glass.

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.

Answer:

We consider that window wall systems should not fall within the scope of the goods under investigation, for the reasons set out in the product scope analysis discussed above.

[Commercially Sensitive Information: detailed reasoning regarding the scope analysis and product characterisation]

Nevertheless, in order to cooperate fully with the investigation, and in the absence of any explicit clarification from the Investigating Authority regarding the scope of the goods under consideration, we have still reported window wall systems in the relevant sections of the questionnaire relating to the goods under investigation.

[Commercially Sensitive Information: description reported in the questionnaire]

As we consider that window wall systems are neither properly characterised as windows nor as doors, they cannot be appropriately classified under the existing MCC Category 1 and Category 3 classifications. Accordingly, for reporting purposes only, we have added [Commercially Sensitive Information: internal MCC classification code] under MCC Category 1 (Door/Window) to denote window wall systems, and [Commercially Sensitive Information: internal MCC product type code] under MCC Category 3 (Type) to identify the relevant window wall product type.

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: [Yetta](#)

Position in the company: [Marketing Manager](#)

Telephone: [+86 15914194215](#)

E-mail address: yetta@altop.com.cn

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

Name: [JINGTIAN & GONGCHENG](#)

Address: [Units10-12, Room 01, 39/F, CTF Finance Centre, No.6 Zhujiang East Road, Tianhe District, Guangzhou 510623, China](#)

Telephone: [+86 18901205688](#)

E-mail address: luo.xinqu@jingtian.com

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

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

Answer:

The financial records are kept in [[Commercially Sensitive Information: location of financial records](#)], China.

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

Answer:

The production records are kept in [[Commercially Sensitive Information: location of production records](#)], China.

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

Answer:

The production plant manufacturing the goods under consideration (GUC) is located in [[Commercially Sensitive Information: location of production records](#)], China.

A-2 Company information

1. What is the legal name of your business?

Answer:

The legal name of the Company is [Altop Facade Co., Limited](#) (hereinafter referred to as "Altop" or "the Company").

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

Answer:

[Altop does not trade under a different name or brand.](#)

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

Answer:

[Altop was not known by a different legal or trading name.](#)

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

Answer:

[Altop has no board of directors. This question is not applicable.](#)

5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)?
If yes, provide:
(a) A diagram showing the complete ownership structure and
(b) A list of all related companies and its functions

Answer:

Please refer to [Exhibit A-2.5.a](#) for Altop's complete ownership structure and [Exhibit A-2.5.b](#) for a list of all related companies and their functions.

6. Is your company or parent company publicly listed?
If yes, please provide:
(c) The stock exchange where it is listed and
(d) Any principle shareholders¹
If no, please provide:
(a) A list of all principal shareholders and the shareholding percentages.

Answer:

Not applicable. The company is not listed. The company is owned by two natural persons, i.e., [Commercially Sensitive Information: name of shareholder] and [Commercially Sensitive Information: name of shareholder] holding 53.5% and 46.5% of the company respectively. Altop has no parent company.

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

Answer:

The nature of Altop's business are as follows:

Design, production, and sale of aluminum windows, doors and window wall products to Australia;

Provision of construction installation services, and sale of windows, doors and window wall products within China;

Sale of building materials such as aluminium panels, stainless steel as well as like goods to other countries.

8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:
(a) produce or manufacture
(b) sell in the domestic market
(c) export to Australia and
(d) export to countries other than Australia.

Answer:

Altop performs the following functions in relation to the goods under consideration:

(a) produce or manufacture

During the investigation period (IP), Altop is a producer of GUC.

(b) sell in the domestic market

Altop sold a small amount of like goods in domestic market.

In China, Altop's main business is [Commercially Sensitive Information: scope of Altop's domestic business].

(c) exports to Australia

¹ Principal shareholders are those who are able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company.

During the period, Altop exported the GUC to Australia, which is the main market of Altop. In this part of the sales, [Commercially Sensitive Information: Australian business model]. Altop Australia uses products such as doors and windows purchased from Altop to provide construction installation services in the domestic market of Australia.

(d) exports to countries other than Australia

Altop sold a small amount of like goods to countries other than Australia.

9. Provide your company's internal organisation chart.

Answer:

Please refer to [Exhibit A-2.9](#) for Altop's internal organisation chart.

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

Answer:

The functions of Altop's organizational structure are as follows:[Commercially Sensitive Information: organizational structure of Altop]

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

Answer:

Please refer to [Exhibit A-2.11](#) for Altop's product catalog for promotion.

A-3 General accounting information

1. What is your financial accounting period?

Answer:

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

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

Answer:

The financial accounts are audited. The auditor for the last complete financial year 2024 is [Commercially Sensitive Information: auditor of Altop].

3. What currency are your accounts kept in?

Answer:

The account is kept in by Chinese Yuan (CNY).

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

Answer:

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

5. What is the name of your sales system?

Answer:

Altop has no separate sales system. Sales information is recorded in financial accounting system [Commercially Sensitive Information: name of financial accounting system].

6. What is the name of your production system?

Answer:

Altop has no separate production system. Production information is recorded in financial accounting system [Commercially Sensitive Information: name of financial accounting system].

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

Answer:

As Altop's financial accounting, sales and production systems are all using [Commercially Sensitive Information: name of financial accounting system], this question is not applicable.

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

Answer:

The accounting practices of Altop does not differ with generally accepted accounting principles ("GAAP") in China. Altop's accounting practices are consistent with the GAAP of China.

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

Answer:

There is no change to Altop's accounting practices and/or policies over the last two years.

A-4 Financial Documents

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

Answer:

Please see [Exhibit A-4.1.a](#) and [Exhibit A-4.1.b](#) for audit reports of 2023 and 2024.

The company has no related companies involved in the production and sale of the goods.

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

Answer:

Please see [Exhibit A-4.1.a](#) and [Exhibit A-4.1.b](#).

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

Answer:

Not applicable. The financial statements are audited.

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

Answer:

As Altop only maintains one profit centre, this question is not applicable.

5. If the period is different to your financial period, please provide:
 - (a) Income statements directly from your accounting information system covering the most recent financial period and the period or
 - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

Answer:

Altop's financial accounting period is from January 1 to December 31, which is different from the period.

Please refer to [Exhibit A-4.5.a](#) and [Exhibit A-4.5.b](#) for the income statements identified covering 2024 and the period.

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

Answer:

Please refer to [Exhibit A-4.6.a](#) and [Exhibit A-4.6.b](#) for the trial balance (in Excel) covering 2024 and the period.

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

Answer:

Please refer to [Exhibit A-4.7](#) for the chart of accounts (in Excel).

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

SECTION B EXPORT SALES TO AUSTRALIA

B-1 Australian export sales process

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

Answer:

Sales to Australia are project-based, with all customers being engineering clients.

Altop has its own showroom in Australia, displaying samples of products. If a client has a project open for bidding and is interested in Altop's products, they will invite Altop to participate in the tender. Upon receiving the invitation, Altop will submit a bid and engage in multiple rounds of clarification to finalize key transaction terms. After winning the bid, Altop will negotiate transaction details with the client and sign a contract, specifying important information such as product specifications, quantity, price, delivery deadlines, payment terms, etc. The client makes payments according to the contract milestones, while Altop ships the goods and issues invoices based on the agreed schedule.

Generally, clients make advance payments at three stages: after signing the contract, after the products meet qualification standards, and before shipment, with the final payment made after shipment. Altop issues invoices to clients upon shipment.

2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:
 - (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details
 - (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details
 - (c) How is the exchange rate determined in your accounting system and how often is it updated?

Answer:

During the IP, Altop is paid in AUD by Australian customers.

During the IP, there were no contracts to lock in the foreign exchange rates.

When paid in AUD, the exchange rate used for accounting was based on the central parity rate of the RMB against the AUD published by the People's Bank of China on the first working day of each month.

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

Answer:

For the sales of GUC to Australia, some were sold to unrelated customers, and some were sold to the subsidiary of Altop's sister company, Altop Australia. Altop Australia uses GUC purchased from Altop to provide construction installation services in the domestic market of Australia.

The selling prices are determined by cost plus target profit, fluctuating by the market situation.

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

Answer:

Altop does not maintain or publish any price list. Instead, the price is determined through negotiation and agreed separately for each transaction.

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

Answer:

The export selling price did not vary according to the distribution channel, all determined by cost plus target profit, fluctuating by the market situation.

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

Answer:

Altop does not provide any on-invoice discounts or off-invoice rebates in relation to the sale of the goods exported to Australia during the period.

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

Answer:

Altop did not 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.

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

- (a) Are you claiming a date other than the invoice date as the date of sale?
(b) If you are claiming a date other than the invoice date as the date of sale, why does this date better reflect the material terms of sale? Provide evidence to support your claim. Any claim for an adjustment would need to substantively address:

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

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

Answer:

Altop claims the commercial invoice date shall be taken as the date of sale, because all material terms, including unit price, quantity, amount, payment terms and delivery terms were fixed on the commercial invoice issued and kept unchanged.

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.

Answer:

Please refer to [Appendix B-2](#) for the Australian sales.

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

Answer:

Please refer to [Appendix B-2.2](#) for the Australian sales source, and [Exhibit B-4.2.e Source of Australian Sales of GUC](#) for the supporting documents.

B-3 Sample export documents

1. Select the two largest invoices by value and provide the following documentation:
 - Contracts
 - Purchase order and order confirmation
 - Commercial invoice and packing list
 - Proof of payment, remittance advice and accounts receivable ledger
 - Documents showing bank charges
 - Invoices for inland transport
 - Invoices for port handling and other export charges
 - Bill of lading
 - Invoices for ocean freight & marine insurance (if applicable)
 - Country of origin certificates (if applicable)

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

Answer:

Please refer to [Exhibit B-3.1.a](#) and [Exhibit B-3.1.b](#) for the requested export sales documents.

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

Answer:

The information and data in the "B-2 Australian sales" listing are marked with red boxes in the provided export sale documents for reconciliation purpose. Please refer to [Exhibit B-3.1.a](#) and [Exhibit B-3.1.b](#) for the export sale documents.

B-4 Reconciliation of sales to financial accounts

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

Answer:

Please refer to [Appendix B-4 Upwards sales](#) which demonstrates that the sales listings in B-2, D-2 and F-2 are complete.

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

Answer:

PUBLIC RECORD

Please refer to [Exhibit B-4.2.a~Exhibit B-4.2.f](#) for all documents required to complete “B-4 Upwards sales” worksheet.

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

Answer:

All hard coded amounts sources and notes are indicated in “[B-4 Upwards sales](#)” in red font.

SECTION C EXPORTED GOODS & LIKE GOODS

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

C-1 Models exported to Australia

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

Answer:

The goods exported by Altop to Australia during the period included sliding door, window wall panel, windows, door sash and non-GUC such as curtain walls and their components.

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

Answer:

MCCs of the goods exported by Altop to Australia during the period are as follows:

[Commercially Sensitive Information: MCCs of Altop]

C-2 Models sold in the domestic market

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

Answer:

The goods sold on domestic market is windows and building services.

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

Answer:

MCC of the goods sold on domestic market is [Commercially Sensitive Information: MCC of Altop 's domestic sale]

C-3 Internal product codes

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

If yes:

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

If no:

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

Answer:

Altop uses a product codes.

- (a) The coding system has been provided as the [Exhibit C-3.1.a](#).
- (b) Product or SKU codes does not reflect MCC information. Instead, these codes are primarily used to identify project-related information such as the building section and installation location. In general, the first digit of the product code represents the building block or floor; the second

digit represents the product type; the third digit represents the installation location; and the fourth digit represents the drawing sequence number.

We identify MCC from below sources:

MCC Category 1 - Door/window: Packing List Details provided in Exhibit B-4.2.e.

MCC Category 2 - Assembly form: All of Altop's products are partially assembled, which will be assembled after delivered to the customer.

MCC Category 3 – Type: Packing List Details provided in Exhibit B-4.2.e.

MCC Category 4 – Height: Packing List Details provided in Exhibit B-4.2.e.

MCC Category 5 – Width: Packing List Details provided in Exhibit B-4.2.e.

MCC Category 6 - Thermal break: Sample drawing provided in Exhibit B-3.1.a and Exhibit B-3.1.b.

MCC Category 7 - Glaze: Sample drawing provided in Exhibit B-3.1.a and Exhibit B-3.1.b.

MCC Category 8 – Coating: Sample drawing provided in Exhibit B-3.1.a and Exhibit B-3.1.b.

MCC Category 9 – Safety: Sample drawing provided in Exhibit B-3.1.a and Exhibit B-3.1.b.

(c) Please refer to [Exhibit C-3.1.c](#) for the table showing the product codes for each MCC.

SECTION D DOMESTIC SALES

D-1 Domestic sales process

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

Answer:

If there is a project open for bidding in which Altop is interested, Altop will submit a bid and engage in multiple rounds of clarification to finalize key transaction terms. After winning the bid, Altop will negotiate transaction details with the client. As the project progresses, the delivery list will specify important information such as product specifications, quantity, delivery deadlines, payment terms, etc. The client makes payments according to the project progresses, while Altop ships the goods and issues invoices based on the project schedule, and the customer will make payment after the invoices are issued.

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.

Answer:

The domestic customers are not related to Altop.

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

Answer:

Altop does not maintain or publish any price list. Instead, the price is determined through negotiation and agreed separately for each transaction.

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

Answer:

The domestic selling price is determined based on cost and target profit, fluctuating with market situation, not varying according to the distribution channel.

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

Answer:

Altop does not provide any on-invoice discounts or off-invoice rebates in relation to the sale of the like goods during the period.

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

Answer:

Altop did not 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.

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

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

Answer:

Altop claims the VAT invoice date shall be taken as the date of sale, because all material terms, including unit price, quantity, amount, payment terms and delivery terms were fixed on the VAT invoice and kept unchanged.

D-2 Domestic sales listing

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

Answer:

Please refer to [Appendix D-2](#) for the domestic sales.

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

Answer:

Please refer to [Appendix D-2.2](#) for the domestic sales source, and [Exhibit B-4.2.d Source of Domestic Sales of GUC](#) for the supporting documents.

D-3 Sample domestic sales documents

- Select the two largest invoices by value and provide the following documentation:
 - Contracts
 - Purchase order and order confirmation
 - Commercial invoice and packing list
 - Proof of payment, remittance advice and accounts receivable ledger
 - Documents showing bank charges
 - Delivery invoices

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

Answer:

Please refer to [Exhibit D-3.1.a](#) and [Exhibit D-3.1.b](#) for the requested domestic sales documents.

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

Answer:

The information and data in the “D-2 Australian sales” listing are marked with red boxes in the provided export sale documents for reconciliation purpose. Please refer to [Exhibit D-3.1.a](#) and [Exhibit D-3.1.b](#) for the export sale documents.

D-4 Reconciliation of sales to financial accounts

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

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

Answer:

Please refer to [Appendix B-4 Upwards sales](#) which demonstrates that the sales listings in D-2 and F-2 are complete.

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

Answer:

Please refer to [Exhibit B-4.2.a~Exhibit B-4.2.f](#) for all documents required to complete “B-4 Upwards sales” worksheet.

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

Answer:

All hard coded amounts sources and notes are indicated in “[B-4 Upwards sales](#)” in red font.

SECTION E DUE ALLOWANCE

E-1 Credit expense

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

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

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

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

Answer:

Altop does not provide credit to customers. The payment terms are "Prepayment". Therefore, Altop does not undertake any credit expenses.

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

Answer:

During the period, there was [Commercially Sensitive Information: borrowing information] short term borrowing, the average interest rate of which is [Commercially Sensitive Information: borrowing information].

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

Answer:

During the period, there was no interest earning deposits or other cash product.

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

- (a) Do you have short term borrowings or an overdraft facility denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?
- (b) Do you have any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

Answer:

Not applicable. Altop has no short-term borrowings or an overdraft facility denominated in AUD, or interest earning deposits or other cash product denominated in AUD.

E-2 Packaging

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

Answer:

The packaging used in domestic sales is iron frame packaging.

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

Answer:

The packaging used in export sales of GUC to Australia is also iron frame packaging.

3. If there are distinct differences in packaging between your domestic and export sales:
 - (a) Provide details of the differences
 - (b) Calculate the weighted average packaging cost for each model sold on the domestic market
 - (c) Calculate the weighted average packaging cost for each model exported to Australia

Answer:

Not applicable. There is no difference in packaging between domestic and export sales.

E-3 Delivery

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

Answer:

The domestic sales of like goods were delivered to the customer by Altop. The transportation costs reported in D-2 were based on the actual expenses incurred, allocated by SQM.

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

Answer:

During the period, the delivery terms of export sales of the goods to Australia are CIF and EXW.

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

Answer:

The inland transport charges in B-2 were reported based on the actual expenses incurred, allocated by value.

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

Answer:

The port handling and other export charges in B-2 were reported based on the actual expenses incurred, allocated by value.

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

Answer:

The ocean freight in B-2 were reported based on the actual expenses incurred, allocated by value.

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

Answer:

The marine insurance in B-2 were reported based on the actual expenses incurred, allocated by value.

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

Answer:

The delivery terms of the Australian sales do not include delivered duty paid.

E-4 Other direct selling expenses

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

Answer:

Altop does not provide sales commissions for domestic sales of like goods or export sales of the goods.

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

Answer:

The value-added tax rate is 13% domestic sales, 0% for exports.

The VAT is accounted based on the actual tax value., i.e. 13% for domestic sales and zero for exports.

Altop does not receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods.

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

Answer:

As explained above, the domestic sales of like goods were delivered to the customer by Altop. The transportation costs reported in D-2 were based on the actual expenses incurred, allocated by quantity in SQM.

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

Answer:

There is no other direct selling expense incurred by Altop in relation to export sales of the goods to Australia.

E-5 Other adjustment claims

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

Answer:

There are no other adjustments claimed by Altop.

² Available on the commission website

SECTION F THIRD COUNTRY SALES

F-1 Third country sales process

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

Answer:

There is no difference between exports to countries other than Australia and sales process described in B-1.1.

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

Answer:

There is no third country customer related to Altop.

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

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

(b) Why does this date best reflect the material terms of sale? Any claim for an adjustment would need to substantively address:

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

Answer:

Altop claims the commercial invoice date shall be taken as the date of sale, because all material terms, including unit price, quantity, amount, payment terms and delivery terms were fixed on the commercial invoice issued and kept unchanged.

F-2 Third country sales listing

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

Answer:

Please refer to [Appendix F-2](#) for the third country sales.

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

Answer:

Please refer to [Appendix F-2.2](#) for the third country sales source, and [Exhibit B-4.2.f Source of Third Country Sales of GUC](#) for supporting documents.

F-3 Differences in sales to third countries

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

Answer:

There is no difference in sales to third countries.

SECTION G COST TO MAKE AND SELL

G-1 Production process

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

Answer:

Please refer to [Exhibit G-1.1](#) for Production Process Chart.

No scrap or by-product is generated during the production process of the goods.

The production facilities used for the goods cannot be used to manufacture other products.

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

Answer:

There is no supplier related to Altop.

G-2 Cost accounting practices

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

Answer:

Altop'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.

Answer:

As Altop uses actual costs, these questions are not applicable.

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

Answer:

Altop adopts the project costing method. Project costing, also known as job costing, is a foundational accounting method where all direct material costs are tracked, accumulated, and assigned to individual, discrete projects. It treats each project as a unique cost object, allowing for precise tracking of materials.

The core mechanism is charging costs of direct materials straight to each project, while direct labour and manufacturing overhead are allocated using labour hours.

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

Answer:

Altop only has one cost centre. All costs are recorded in the one single cost centre.

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

Answer:

Altop records costs by project number rather than by product. In response to the ADC's requirement to account for the costs of the GUC, the company's finance department collaborated with production

department to identify the cost allocation rules for these products. The relevant allocations were then performed in order to complete the required cost tables. The detailed allocation method is explained in our response to [question G-6.2](#).

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

Answer:

There are no special and separate management accounting system maintained by Altop. The costs system is part of the Company's financial accounting system.

7. Has your company engaged in any start-up operations in relation to the goods? If yes:
- (a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
 - (b) State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.

Answer:

Altop did not engage in any start-up operations in relation to the goods during the period.

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

Answer:

Altop uses weighted average method to evaluate raw materials.

For work-in products, Altop only records the raw material costs.

Altop does not evaluate finished goods inventories since the company produces based on project and there is no inventory for finished goods.

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

Answer:

Please kindly note that no damaged or sub-standard goods is generated during the manufacture process of the goods or like goods.

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

Answer:

Please kindly note that no scrap, by-products or joint products is generated during the manufacture process of the goods or like goods.

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

Answer:

There is no such fee/corporate allocation.

G-3 Cost to make on domestic market

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

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

Answer:

Please refer to [Appendix G-3](#) for the Domestic CTM.

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

Answer:

Please refer to [Appendix G-3.2](#) for the Domestic CTM Source, and [Exhibit G-3.2.a Source of domestic CTM](#) for the supporting documents.

G-4 Selling, General & Administrative expenses

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

Answer:

Please refer to [Appendix G-4.1](#) for the SG&A Listing.

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

Answer:

Please refer to [Appendix G-4.2](#) for the Domestic SG&A Calculation.

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

Answer:

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

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

Answer:

Please refer to [Exhibit G-4.4.a](#) and [Exhibit G-4.4.b](#) for the relevant general ledgers of all SG&A accounts (in Excel) covering the IP and the most recent financial year 2024.

G-5 Cost to make the goods exported to Australia

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

Answer:

Please refer to [Appendix G-5](#) for the Australian CTM.

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

Answer:

Please refer to [Appendix G-5.2](#) for the Australian CTM Source, and [Exhibit G-3.2.b Source of Australian CTM](#) for the supporting documents.

G-6 Cost allocation method

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

Answer:

As explained above, Altop records costs by project number rather than by product. In response to the ADC's requirement to account for the costs of the GUC, the company's finance department collaborated with production departments to identify the cost allocation rules for these products. The relevant allocations were then performed in order to complete the required cost tables.

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

Answer:

As explained above, the company only records costs on a per-project basis and does not maintain separate records for each type of product.

However, for each product type within a project, the company prepares a budget for unit direct material costs before production begins. Therefore, the company identifies the [Commercially Sensitive Information: cost allocation method]. This proportion serves as a relatively accurate basis for allocation.

In the next step, the company multiplies [Commercially Sensitive Information: cost allocation method].

Through this approach, the company ensures that the proportion of raw materials for each product within the project remains at an accurate level while also maintaining consistency with the actual raw material costs recorded in the project accounting.

G-7 Major raw material costs

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

Answer:

The major raw materials are aluminium extrusions and glass.

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

Answer:

Altop does not produce raw materials. All materials are sourced from unrelated companies. This question is not applicable.

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

Answer:

The total CTM of GUC in "G-3 Domestic CTM" is [Commercially Sensitive Information: CTM of Altop] RMB, of which [Commercially Sensitive Information: CTM of Altop] RMB of aluminium extrusion and [Commercially Sensitive Information: CTM of Altop] RMB of glass is used for the production of GUC. The percentage is [Commercially Sensitive Information: CTM of Altop] and [Commercially Sensitive Information: CTM of Altop] respectively.

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.

Answer:

Please refer to [Appendix G-7.4](#) for the Raw Material Purchases.

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

Answer:

Please refer to [Exhibit G-7.5](#) for the source of the data.

6. For each raw material:
 - (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.
 - (b) Reconcile the total value listed in "G-7.4 Raw material purchases" listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Answer:

Please refer to [Exhibit G-7.6.a](#) for the documents of two largest invoice by value.

Please refer to [Exhibit G-7.5](#) for the relevant purchase ledger and reconciliation.

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.
- 8.

Answer:

There is no supplier in "G-7.4 Raw material purchases" listing related to Altop.

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

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

Answer:

Please refer to [Appendix G-8](#) for upwards costs as requested to demonstrate that the cost listings in G-3 and G-5 are complete.

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

Answer:

Please refer to [Exhibit B-4.2.a~ Exhibit B-4.2.b](#) and [Exhibit G-3.2.a~ Exhibit G-3.2.c](#) for other worksheet documents to complete the "G-8 Upwards costs".

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

Answer:

All hard coded amounts sources and notes are indicated in "[G-8 Upwards costs](#)" in red font.

G-9 Production of the goods under consideration

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

Answer:

As explained above, the company arranges production based on sales volume. The production volume is equal to the sales volume.

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

Answer:

The company arranges production based on sales volume, so the production volume is equal to the sales volume. The accounting system does not record the production quantity separately.

3. Briefly explain the reasons for any differences between:
 - (a) the production quantities reported at worksheet "G-3 domestic CTM" and the sales volumes reported at worksheet "D-2 domestic sales" and
 - (b) the production quantities reported at worksheet "G-5 Australian CTM" and the sales volumes reported at worksheet "B-2 Australian sales".

Answer:

There is no difference between sales quantity and production quantity, since Altop's production is based on orders and there is no inventory of GUC.

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

Answer:

Altop has no fixed production plan. Altop makes production based on orders, that is, firstly receives a purchase order and then start production.

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

Answer:

Altop has no fixed production plan. The lead times are various due to different sale orders. The delivery cycle depends on the clients' project progress.

G-10 Capacity Utilisation

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

Answer:

Please refer to [Appendix G-10](#) for the Capacity Utilisation.

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

Answer:

The production capacity is calculated as follows:

Production capacity per line per day x number of production lines x working days per month x working months each year.

The capacity utilisation is calculated as follows:

Capacity utilisation = Actual production quantity / Production capacity x 100%

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

Answer:

Altop does have warehouse. However, since Altop produces based on order, it has no stock of GUC. The warehouse is used to storing raw materials.

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

Answer:

There was no change to the type of capital or technology utilised by Altop.

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

Answer:

This question is not applicable. Altop does not produce inputs.

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

Answer:

This question is not applicable. There has been no significant investment in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.

SECTION H PARTICULAR MARKET SITUATION

H-1 Reporting requirements

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

ANSWER:

Altop should file the financial statements to the taxation authorities so that the authorities can calculate and review the amount of taxes that should be levied on Altop.

- (b) payment of taxes

ANSWER:

Altop should pay income tax, value-added tax and other applicable taxes to the taxation authorities.

- (c) senior management representation within your business

ANSWER:

The senior management of Altop has no involvement with the GOC. Altop is a private owned company.

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

ANSWER:

As a private company, Altop is not supervised by the State-owned Assets Supervision and Administration Commission (SASAC) or anybody under the control of SASAC.

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

ANSWER:

As a private company, Altop makes its own business decisions, no government department/office is involved.

- (f) Licensing

ANSWER:

Altop has obtained a Business license under Chinese Law and is free to operate under laws and regulations without government intervention.

- (g) restrictions on land use

ANSWER:

Please kindly note there's no special restriction on the land use of Altop since its establishment.

- (h) provision of loans or

ANSWER:

Please note that Altop didn't receive any preferential loans since its establishment.

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

ANSWER:

Altop has received certain government grants during the period. These grants were provided under programs generally available to all eligible enterprises that meet the relevant criteria. They were not related to the production, sale, or export of the goods under investigation. Please refer to Part I for more details.

H-2 Business structure, ownership and management

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

ANSWER:

Altop is not an SOE or SIE, it's 100% privately owned.

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

ANSWER:

The list of the Board of Directors and Board of Shareholders and all other entities/businesses Altop is related to are as follows:

Board of Directors	[Commercially Sensitive Information: name of directors]	[Commercially Sensitive Information: name of directors]	
Board of Shareholders	[Commercially Sensitive Information: name of shareholders]	[Commercially Sensitive Information: name of shareholders]	
Related Companies	[Commercially Sensitive Information: name of related companies]	[Commercially Sensitive Information: name of related companies]	[Commercially Sensitive Information: name of related companies]

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

ANSWER:

The common directors and officers between Altop and its related businesses are [Commercially Sensitive Information: name of directors].

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

ANSWER:

Please kindly note that no member of Altop is a representative, employee or otherwise affiliated with the GOC.

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

ANSWER:

Please kindly note that there's no representative from the CCP in Altop.

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

ANSWER:

No member of Altop is appointed or recommended by the GOC.

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

ANSWER:

Altop is owned by two individual shareholders. [Commercially Sensitive Information: shareholder information] of the shares and [Commercially Sensitive Information: shareholder information] of the shares. Both shareholders are Chinese nationals and directors of the company. Neither shareholder is an affiliate, representative, agency or otherwise representative of the Government of China. Neither shareholder is a foreign investor.

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

ANSWER:

Please kindly note that there was no significant change in the ownership structure of Altop during the period.

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

ANSWER:

Please kindly note that no management position is appointed or designated to act on behalf of government authorities.

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

ANSWER:

Please note that there are no such requirements in law or practice.

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

ANSWER:

Altop is not a publicly-traded company, thus this question is not applicable.

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

ANSWER:

Altop is not a publicly-traded company, thus this question is not applicable.

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

ANSWER:

The executive director, [Commercially Sensitive Information: managing information] has the right to reward, fire or discipline the senior managers.

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

ANSWER:

Please note that there is no manager from Altop holding positions in any GOC departments, organizations, associations or Chambers of Commerce.

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

ANSWER:

Please note that Altop has no pricing committee, price is determined by Altop's business department based on cost and profit margin.

H-3 Licensing

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

ANSWER:

Please refer to [Exhibit H-3.1](#) for the business license of Altop and its English translation.

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

ANSWER:

The State Administration for Market Regulation of Shenzhen is responsible for issuing Business License.

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

ANSWER:

In general, the procedure to apply for a license is to apply with materials set forth below:

- A letter of application issued by the legal representative;
- Certificate of a representative of shareholders or an agent jointly appointed by shareholders;
- A copy of the Articles of Association;
- Certificate for the place of operation;
- Certificate of property;
- Identity of the legal representative;
- Certificate of investment verification;
- Letter of appointment of the chairman and managers, their names, identity, residence, and name of the company.

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

ANSWER:

No particular requirement or condition must be met to obtain the license.

Altop could obtain the business license as long as it meets the general requirements and conditions as stated in the Company Law of the People's Republic of China:

- the number of shareholders constitutes a quorum;
- the company has capital contributions in compliance with the articles of association of the related company, which are subscribed for by all shareholders;
- the articles of association are formulated collectively by shareholders;
- the company has a name and an organizational structure that complies with the requirements for limited liability companies; and
- the company has a domicile.

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

ANSWER:

The Business License indicates that a company is incorporated under the relevant laws and has duly obtained a "legal entity" status. No restrictions are imposed on activities specified and performed by a company.

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

ANSWER:

If a company wishes to expand its business scope, it must notify the Administration for Market Regulation, where the company is registered. Suppose a company expands its business scope without informing the local Administration for Market Regulation. In that case, the administration will stop it according to the law and confiscate illegal income. If the company's behavior violates criminal law, the company shall be investigated for criminal responsibility according to the law.

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

ANSWER:

Based on Altop's articles of association, the company is authorized to engage in the following activities: [Commercially Sensitive Information: scope of Altop's business].

These rights and benefits enable Altop to legally operate its business.

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

ANSWER:

Suppose a company is involved in illegal activities, goes bankrupt, engages in fraudulent business practices, forges document, alters the Business License or transfers, lends or rents the Business License, etc. In that case, the State Administration for Market Regulation can revoke the Business License.

H-4 Decision-making, planning and reporting

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

ANSWER:

The decision-making process is, in general, done by the General Manager. Usually, business decisions are made based on [Commercially Sensitive Information: operating information] and other related information.

Decisions relating to the types of goods to be produced are primarily determined by the Operation Coordination Department, and decisions regarding the allocation of outputs and product mix are made under the direction of the Business Department.

The production department and design department are responsible for determining and managing the production process, these two departments also decide allocation of inputs, including raw materials, labour, and energy, based on production requirements.

The labour force is normally secured from the labour market based on mutual needs.

Profit is distributed following Altop's articles of association.

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

ANSWER:

There is no government involvement in the decision-making process respecting marketing and sale of the goods.

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

ANSWER:

Please note that no government department/office is involved, either directly or indirectly, in manufacturing, selling or purchasing the goods.

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

ANSWER:

Altop needs to report its annual report information in the China National Enterprise Credit Information Publicity System every year, which is operated by the State Administration for Market Regulation.

Moreover, Altop needs to submit the enterprise income tax return and VAT application form to the relevant tax authorities.

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

ANSWER:

As a private company, Altop does not have copies of any Provincial/City Five Year Plans.

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

ANSWER:

No, Altop has no Five-year Plans.

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

ANSWER:

Please note that Altop didn't hold a Board of Directors meeting over the investigation period.

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

ANSWER:

Altop doesn't hold company meetings to make pricing decisions on the goods under consideration. As mentioned above, the decision-making process is normally done by the Business Department on a transaction-by-transaction basis, depending on [the specific tender].

H-5 Financial and investment activities

1. Is your business debt funded? If yes, provide a list of all major lenders.

ANSWER:

Yes, the list of major lenders is as below: [Commercially Sensitive Information: borrowings information]

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

ANSWER:

The average interest rate paid by Altop on its debt instruments over the last five years was approximately [Commercially Sensitive Information: borrowing information].

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

ANSWER:

Please kindly note that there are no concessional interest rates for Altop's loans in the last 5 years, this question is not applicable.

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

ANSWER:

Please note that Altop has not raised any capital using the issuance of shares, preferential shares, rights issues, bonds, warrants, debentures, sub-ordinate loans, and other debt and equity instruments in the last 5 years.

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

ANSWER:

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

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

ANSWER:

Please note that Altop has not invested in either government or non-government debt securities (including bonds, quasi-government bonds).

H-6 Government policy on the industry

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

ANSWER:

As far as Altop's knowledge, there are not any government of China opinions, directives, decrees, promulgations, measures, etc. concerning industry of the goods that were put in place or operating during the period.

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

- industrial policy and guidance on the industry

ANSWER:

Altop doesn't know if there is any industrial policy or guidance on the aluminum doors and windows industry.

- market entry criteria for the industry

ANSWER:

Altop is not aware of any such entry criteria for the aluminum doors and windows industry.

- environmental enforcement for the industry

ANSWER:

Altop is not aware of any such environmental enforcement for the aluminum doors and windows industry.

- management of land utilization

ANSWER:

The mandate of the Land and Resources Bureau is universal in its region. It does not focus on the aluminum doors and windows industry sector or insofar, as Altop is aware, any other manufacturing sector.

Shenzhen Planning and Natural Resources Bureau Bao'an Management Bureau

Website: <https://www.wenan.gov.cn/GOV1/Item/3128.aspx>

Tel: [Commercially Sensitive Information: contact information]

- the China Banking Regulatory Commission for the industry

ANSWER:

Altop doesn't have knowledge if CBRC regulates the aluminum doors and windows industry.

- investigation and inspection of expansion facilities

ANSWER:

In China, the expansion of factory facilities is generally supervised by the Planning and Natural Resources Bureau. Enterprises are required to submit a construction application together with relevant design drawings and planning proposals, which must be reviewed and approved before any expansion can proceed.

Shenzhen Planning and Natural Resources Bureau Bao'an Management Bureau

Website: <https://www.wenan.gov.cn/GOV1/Item/3128.aspx>

Tel: [Commercially Sensitive Information: contact information]

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

ANSWER:

Altop has not dealt with such authority and is unaware of any NDRC responsibility for aluminum doors and windows industry.

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

ANSWER:

Since Altop does not import raw materials, Altop is not aware of any such import licensing for raw materials of aluminum doors and windows.

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

ANSWER:

Please kindly note that Altop is a private company and does not play any role in developing the government's industrial plans and policies at all levels of government. Altop does not provide information for or request inclusion in any plans, policies, or measures.

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

ANSWER:

Altop does not provide information relating to assessments of the implementation of the plan, policy or measure.

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

ANSWER:

Please note that Altop or the aluminum doors and windows industry are not designated by the Government of China as "pillar," "encouraged," "honourable," or any other designation.

H-7 Taxation

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

ANSWER:

No, there wasn't any export tax on the exports of aluminum doors and windows during the investigation period.

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

ANSWER:

The value-added tax rebate applicable to exports of the goods during the period was 13%.

3. Have there been any changes to the value-added tax rebate applicable to exports of the goods in the last 5 years? If yes, provide:

- a. a detailed chronological history of the value-added tax rebate rates
- b. products affected
- c. the effective dates of the rate changes
- d. fully translated copies of any Government of China notices regarding these changes, including the relevant appendices.

ANSWER:

No, there has not been any changes during the last 5 years.

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

ANSWER:

Altop is not aware of any such tax changes being planned.

H-8 Sales Terms

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

ANSWER:

[Commercially Sensitive Information: operation information] is responsible for establishing sales terms, prices and other contract provisions in Altop.

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

ANSWER:

Usually, selling prices are made by the Business Department based on [Commercially Sensitive Information: operation information].

Please kindly note that there is not any Government of China involvement in Altop' pricing decisions, nor any government guidance pricing.

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

ANSWER:

Please kindly note that Altop does not coordinate the selling prices or supply of the goods with other domestic producers or any Government of China departments, this question is not applicable.

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

ANSWER:

Altop is not required and did not submit information/data to the GOC, other government officials or commercial/industry organizations which report on the industry. The tax related information and company annual reports information/data submitted to the local authorities is for general purposes requested by law.

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

ANSWER:

Please note that Altop never submits any price data to any other person at the provincial, regional or special economic zone level of government.

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

ANSWER:

No. Altop has not encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organizations.

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

ANSWER:

No. Altop has not encountered any other restrictions, limitations, or other considerations imposed on its business.

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

ANSWER:

To the best of Altop's knowledge, there is no price leader for the goods in the market.

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

ANSWER:

No. Altop does not have a pricing committee in respect of the goods, the prices are made by the Business Department of Altop.

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

ANSWER:

Altop does not have a pricing committee in respect of the goods, so this question is not applicable.

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

ANSWER:

[Commercially Sensitive Information: operation information] is responsible for establishing sales terms, prices and other contract provisions for the sale of the goods in Altop.

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

ANSWER:

Altop operates only one production facility for the goods, so this question is not applicable.

H-9 Industry associations

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

ANSWER:

Yes. Altop is a member of the China Association of Building Decorative Materials, Door Windows & Curtain Wall Branch and the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC).

Altop's relationship with these associations is limited to ordinary membership, and Altop does not have specific business dealings with them. Altop participated in the industry response in this investigation through the CCCMC. This CCCMC is under the guidance of the Ministry of Commerce of the People's Republic of China.

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

ANSWER:

Membership in industry associations is voluntary. These associations provide general services such as facilitating industry communication and sharing technical updates. They do not provide directives from the Government of China to Altop, and they do not have any role in Altop's business decision-making.

H-10 Statistics submission/recording

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

ANSWER:

Altop reports company report to the National Enterprise Credit Information Publicity System every year, which is operated by the State Administration for Market Regulation, in accordance with the requirements of Chinese regulations. The purpose of submitting a company annual report is to better understand the company's whole picture.

Also, Altop submits enterprise income tax return and VAT refund return to the relevant tax authorities. The purpose of submitting tax data is to review whether the company is legally paying taxes.

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

ANSWER:

Please refer to [Exhibit H-10.2](#) for the sample of company annual report submitted to the National Enterprise Credit Information Publicity System, and refer to [Exhibit I-3.2](#) for the tax returns.

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

ANSWER:

No, the authorities don't approve or assess Altop's submission.

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

ANSWER:

No, the authorities don't provide feedback on Altop's submission.

H-11 Production/output

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

ANSWER:

Please note that Altop does not aware of such guidance.

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

ANSWER:

Altop does not aware of any such guidance, so this question is not applicable.

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

ANSWER:

Please note that Altop is not aware of such restrictions.

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

ANSWER:

Altop had only one domestic customer for the like goods during the period of investigation, namely [Commercially Sensitive Information: domestic customer information], the project is located in Huizhou, Guangdong. This customer is not an SIE.

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

ANSWER:

Please kindly note that there are no such restrictions and conditions in relation to the quality or quantity of the production of the goods placed upon Altop.

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

ANSWER:

Altop is not required for an export license for all of its business.

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

ANSWER:

Altop is not aware of such restrictions and limits.

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

ANSWER:

No. These has not any changes to Altop's production capacity over the last 5 years.

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

ANSWER:

No, Altop doesn't benefit from any concession on the purchase of any utility services, Altop purchased the utility services at market price level.

H-12 Adding capacity and/or joint ventures

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

ANSWER:

There is no government approval process for adding capacity and/or entering into joint ventures in relation to Altop's business.

Just like Altop, many participants of the aluminum doors and windows industry are privately owned companies. The industry is characterized by constant innovation and productivity enhancement, thus it is a model of pure competition. The company itself can independently make decisions for matters addressed in this question.

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

ANSWER:

No. The government has no right to request modifications in the terms of adding capacity and/or joint ventures.

H-13 Raw materials

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

ANSWER:

No. Altop does not have any related suppliers.

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

ANSWER:

No. Altop does not purchase raw materials from State Invested Enterprises.

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

ANSWER:

Altop's suppliers are all domestic supplier, so this question is not applicable.

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

ANSWER:

Altop negotiates purchase prices for raw materials with each supplier separately, the terms of transaction also make the differences, also, the prices reflect the fluctuation of market situation, the quality and the quality of raw materials.

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

ANSWER:

Altop's purchase procedures of raw materials are as follows:

First, select several raw material suppliers with good reputation in the industry;

Second, let the suppliers provide samples, and Altop carries out testing and trial to determine the quality of raw materials and whether they meet the company's standards.

Altop's considerations in selecting a supplier are as follows:

- ✚ Goodwill of supplier;
- ✚ Quality of raw materials provided by supplier;
- ✚ Whether the supplier's price is satisfactory.

Altop negotiates purchase prices of raw materials with each supplier separately based on Altop's considerations as stated above.

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

ANSWER:

Please kindly note that Altop's business has not been subjected to any direct or indirect price guidance or controls by the GOC during the period, with respect to raw material inputs.

7. If any of your raw materials for the goods and/or like goods are imported by your business, or related businesses:

- a. Provide details including a description of the raw material imported, the supplier and country of origin.
- b. Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
- c. Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
- d. Are you eligible for a duty drawback? If yes, provide details.

ANSWER:

Please kindly note that all raw materials for the goods are not imported or provided by related businesses, this question is not applicable.

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

ANSWER:

Altop does not sell any of the raw materials used to manufacture aluminum doors and windows, or sell the semi-processed goods, so this question is not applicable.

SECTION I COUNTERVAILING

The following programs are being investigated.

Program No	Name	Type
1	Provincial-level Special Project for Promoting High-Quality Economic Development (Direction of Promoting Foreign Trade Development) to Promote the Enrolment of Export Credit Insurance Project Support Funds, Sanshui District Economic and Science and Technology Promotion Bureau	Grant
2	Collection of subsidies, subsidies for anti-dumping litigation fees, Foshan Municipal Bureau of Commerce	Grant
3	One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'	Grant
4	Collection of subsidies for the China Patent Award and the Guangdong Patent Award, Foshan Municipal Market Supervision Bureau	Grant
5	Provincial Scientific Development Plan Fund	Grant
6	Project acceptance, carry forward government special subsidy	Grant
7	Export Brand Development Fund	Grant
8	Social security subsidy for one-time job expansion	Grant
9	Matching Funds for International Market Development for Small and Medium Enterprises (SME)	Grant
10	Superstar Enterprise Grant	Grant
11	Patent Award of Guangdong Province	Grant
12	Training Program for Rural Surplus Labour Force Transfer Employment	Grant
13	Preferential tax policies in the Western Regions	Tax
14	VAT Refunds or Exemptions for the Domestically Purchased Machinery, Equipment and Construction Materials Used for the Production of Exported Goods and the Construction of Production Facilities in the Export Processing Zone	Tax
15	Tariff and VAT Exemptions on Imported Materials and Equipment	Tax
16	Innovative Experimental Enterprise	Grant
17	Export Seller's Credit for High- and New-Technology Products by China EXIM Bank	Preferential Loans
18	Special Support Fund for Non-State-Owned Enterprises	Grant
19	Venture Investment Fund of Hi-Tech Industry	Grant

PUBLIC RECORD

20	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment	Grant
21	Awards to Enterprises whose Products Qualify for "Well-Known Trademarks of China" or "Famous Brands of China"	Grant
22	Technical Renovation Loan Interest Discount Fund	Grant
23	National Innovation Fund for Technology Based Firms	Grant
24	Innovative Small and Medium-Sized Enterprise Grants	Grant
25	Provincial Government of Guangdong (PGOG) tax offset for R&D	Tax
26	Grant - Patent Application Assistance	Grant
27	Grant - Provincial Foreign Economy and Trade Development Special Fund	Grant
28	Grant - Special Supporting Fund for Commercialization of Technological Innovation and Research Findings	Grant
29	PGOG special fund for energy saving technology reform	Grant
30	Development assistance grants from the Zhaoqing New and High Tech Industrial Development Zone (ZHTDZ)	Grant
31	International Market Fund for Small and Medium Sized Export Companies	Grant
32	Processing trade special fund	Grant
33	Trade insurance support fund	Grant
34	Enterprise employment fixed point monitoring work subsidy	Grant
35	Grant - Special Fund for Fostering Stable Growth of Foreign Trade	Grant
36	Special funds for provincial enterprises to transfer and upgrade equipment	Grant
37	Reserve funds for enterprise development	Grant
38	Jiangmen engineering technology research centre award	Grant
39	Special Fund for the Key Projects in the Cultural Innovation Industry by Shunyi District Local Government	Grant
40	Corporate remuneration survey subsidy	Grant
41	Subsidy for the Technology Development	Grant
42	Energy saving project subsidy	Grant
43	Awards for the Contributions to Local Economy and Industry Development	Grant
44	Science and technology project subsidy	Grant
45	Provincial engineering and technology research centre 2016	Grant
46	Foreign trade development fund subsidy of Jiangmen City	Grant
47	Technical renovation project with environmental protection	Grant

PUBLIC RECORD

48	Provincial Market Development Grant for foreign trade exhibitions and SMEs International market development	Grant
49	Integration of informationization and industrialization management system (Note changed from market development due to information provided from Goomax)	Grant
50	Subsidy for invention patents	Grant
51	No. 269: Special project for technology reform - subsidy for technology reform	Grant
52	Madrid Trademark grant by Fujian Provincial Administration for Industry and Commerce	Grant
53	Award for Excellent Enterprise	Grant
54	Social security fund Guangzhou Social Insurance Fund	Grant
55	Patent supporting fund	Grant
56	Unemployment fund Guangzhou Social Insurance Fund	Grant
57	Technology supporting fund	Grant
58	Special fund Industry technology development and research	Grant
59	Industry technology R&D fund	Grant
60	Technology innovation fund	Grant
61	Social security fund Zengcheng City	Grant
62	Medium Size and Small Size Enterprises Development Special Fund	Grant
63	Funds for EFT16 technical reform	Grant
64	EFT provincial Industry and informatization special research expenses supplement fund	Grant
65	VOCs treatment fund for the process of injection workshop	Grant
66	Special Development Fund for Beijing Cultural Innovation Industry	Grant
67	Economic investigation fund	Grant
68	Supporting Fund for Becoming Publicly Listed Company	Grant
69	Receiving the payment from Taishan Finance Bureau	Grant
70	Taishan High-integrity enterprise project fund	Grant
71	Brand Development Fund by Shunyi District Local Governments	Grant
72	Special funds for enterprises in large equipment manufacturing industry	Grant
73	Loan Subsidy for the Curtain Wall Technology Renovation Projects by Beijing Governments	Grant
74	Subsidy for employment of the disabled	Grant
75	Environmental Protection Subsidy from Nan'an City Dongtian Government	Grant
76	Fund for Natural Disaster Relief	Grant
77	Supporting Fund for Science and Technology Expenses by Zengcheng Local Governments	Grant

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78	Subsidy for Chief Technology Officer	Grant
79	Supporting Fund for the Development from Guangzhou Local Governments	Grant
80	Electricity Incentive Reward of Production Increase and Efficiency Increase for Eligible Enterprise of the First Quarter of 2019	Grant
81	Subsidy from Guangzhou Industry and Information Technology Bureau	Grant
82	Export Assistance Grant	Grant
83	Research & Development (R&D) Assistance Grant	Grant
84	Supporting fund provided to Service Outsourcing Enterprises for the Establishment of their Brands and the Acquisition of their International Qualification Accreditations	Grant
85	Supporting Fund provided by Shenyang Municipal Government to the Enterprises to Maintain the Employment Level	Grant
86	Supporting Fund and Interest Assistance provided by Zengcheng Municipal Government to the Research and Development Projects accredited at Guangzhou Municipal Level, Guangdong Provincial Level and National level	Grant
87	Liaoning High-Tech Products & Equipment Exports Interest Assistance	Grant
88	Income Tax Refund for Re-investment of FIE Profits by Foreign Investors	Tax
89	Corporate Income Tax Reduction for New High-Technology Enterprises	Tax
90	Exemption of Tariff and Import VAT for the Imported Technologies and Equipment	Tax
91	Reduction, Exemption or Refund of Land Use Fees, Land Rental Rates and Land Purchase/Transfer Prices	Tax
92	Subsidy Pass-Through from the Purchase of Aluminium Extrusions	Subsidy pass through
93	Reward fund for enterprises absorbing the poverty population for employment across provinces	Grant
94	One-time labor service subsidy for enterprise interprovincial labor service cooperation	Grant
95	Provincial-level reward of green factory	Grant
96	Settlement subsidy for college graduates	Grant
97	Tax regulation allowing additional tax credits for R&D expenses	Tax credit
98	Science and technology fund subsidy Assistance	Grant
99	Assistance from Taishan city to encourage investment and support economic transformation and development	Grant
100	Guangdong Social Insurance Fund Administration	Grant
101	Assistance for training of new apprenticeship system in enterprises	Grant

102	Funds for energy conservation and clean production	Grant
103	Assistance for stable employment treatment	Grant
104	Subsidy of maintenance of employment stability	Grant
105	Deferred payment of income tax	Grant
106	Funds for foreign trade and economic development from central government (matters for coping with trade frictions)	Grant
107	Special funds for the research and industrialization project of environmental protection and energy saving low temperature curing polyester powder coatings	Grant
108	Patented Technology Transaction Funding	Grant
109	Development of Private Economy and Micro, Small and Medium Enterprises at Provincial Level for High Quality Development	Grant
110	New employee allowance (Sanshui District)	Grant
111	Supporting enterprises to purchase credit products and services, Foshan Municipal Bureau of Commerce	Grant
112	Intellectual Property Funding - Reward for High-value Invention Patents, Foshan Municipal Bureau of Science and Technology	Grant
113	Intellectual Property Funding - Domestic Authorized Invention Patent Subsidy	Grant
114	Intellectual Property Funding - Patent Transformation and Utilization Funding	Grant
115	Veterans tax benefits	Tax
116	Tax handling fee refund	Grant
117	Scientific research fund for introducing postdoctoral work, Human Resources and Social Security Bureau	Grant
118	Subsidy to support purchases of credit products and services program, Foshan City Bureau of Commerce	Grant

I-1 General

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

ANSWER:

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

I-2 Provision of goods at less than adequate remuneration

1. For all suppliers and manufacturers of raw materials listed in "I-2 Raw Material Purchases" or "G-7.2 Raw material CTM", provide an explanation and any evidence to support your categorisation of whether the company is a State Invested Enterprise (SIE).

ANSWER:

None of the suppliers and manufacturers of raw materials listed in “I-2 Raw Material Purchases” or “G-7.2 Raw material CTM” are SIEs. Please refer to [Appendix I-2 Raw Material Purchases and Appendix G-7.2 Raw material CTM](#) for detailed information.

To category whether the supplier is a SIE or not, Altop conducted due diligence through “Qichacha,” a professional corporate information platform in China, which provides official registration and ownership details of Chinese companies. Based on the information retrieved, all suppliers are privately owned and independently operated, without state capital participation.

Please refer to [Exhibit I-2.1](#) for the screenshot of Qichacha for each supplier to support the categorization.

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

ANSWER:

Please kindly note that Altop’s suppliers are all non-SIEs, there are no such contractual agreements between SIE and Altop with reference to the granting and receipt of any assistance/benefits.

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

ANSWER:

Please kindly note that Altop does not import any raw materials, so this question is not applicable.

I-3 Preferential tax policies

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

ANSWER:

Please refer to [Appendix I-3 Income Tax](#) for detailed information.

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

ANSWER:

As the tax declaration for 2025 has not been completed yet, we hereby provide the tax return for the years 2022, 2023, and 2024.

Please refer to [Exhibit I-3.2](#) for the annual tax return for the last three financial years of Altop in Chinese and English version.

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

ANSWER:

As the tax declaration for 2025 has not been completed yet, we hereby provide the tax payments for the years 2022, 2023, and 2024.

Please refer to [Exhibit I-3.3](#) for the tax payments and related forms in Chinese and English version.

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

ANSWER:

The general tax rate for enterprises in China during the previous two financial years was 25%.

5. Did your company pay less than the general tax rate for enterprises referred to in question I-3.4? If yes:
- What tax rate did your company pay?
 - Was the reduction in the tax paid or payable related to any of the preferential income tax programs in the table at the top of Section I Countervailing above?
 - What is the name of the program?
 - What is the name of the authority granting your company the reduced tax rate?
 - What is the eligibility criteria to benefit from the reduced tax rate?
 - Provide details of the application process
 - Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
 - Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.
 - Provide a copy of any confirmation or other correspondence from the authority approving your company for the reduction in tax rate. If the documents are not in English, please provide a translation of the documents.
 - Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

ANSWER:

Since the tax rate for Altop during the previous three financial years was 25%, this question is not applicable.

I-4 Financial grants

1. Complete the worksheet named "I-4 Grants"
- This worksheet is a table of the grants received by company over the period plus the two preceding years.
 - You must provide this table in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

ANSWER:

Please refer to [worksheet I-4 Grant](#) for detailed information.

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

ANSWER:

Please note that Altop does not have non-operating income ledger. Please refer to Altop's other business income ledgers for the IP plus the 2 preceding years in [Exhibit I-4.2](#).

Additionally, Altop notes that subsidy income is not recorded under the above two accounts. Instead, it is recorded under the account Other Income. For the Commission's convenience, Altop has also provided the detailed ledgers of the Other Income account for 2023, 2024, and the IP in [Exhibit I-4.2](#).

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

If yes:

- a. Were any of the grants related to any program listed in the table at the top of Section I above? If yes, identify the program.

ANSWER:

Yes, all programs listed in the table at the top of Section I above were identified, please refer to [worksheet I-4 Grant](#) for detailed information.

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

ANSWER:

Yes, grants related to programs not listed in the table at the top of Section I above were identified, please refer to [worksheet I-4 Grant](#) for detailed information.

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

ANSWER:

For grants listed in the table at the top of Section I above, the answers are as follows:

[Commercially Sensitive Information: information of grants received by Altop].

Additionally, Altop has provided a reconciliation table linking the bank slips for subsidy payments with the total amounts of the relevant subsidy programs. Please refer to [Exhibit I-4.4.5](#).

For ease of reference, Altop has compiled all exhibits related to Section I-4.4 in the folder titled "[Exhibit I-4.4](#)". The Commission is kindly invited to review these materials.

For grants not listed in the table at the top of Section I above, Altop has reported these grants in [Worksheet I-4](#), which summarizes detailed information regarding these self-reported grants.

Altop further notes that the total amount of these self-reported grants received by Altop accounts for less than [Commercially Sensitive Information: proportion of self-reported grants] % of the company's total revenue during the investigation period. Given that these programs represent only a very small proportion of the company's revenue and have not been specifically alleged in the application, Altop has limited its response to providing the summary information in [Worksheet I-4](#).

Altop reserves the right to provide further clarifications or responses should the Commission or the Applicant present evidence regarding any additional grant programs.

I-5 Other Programs

1. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business).

ANSWER:

The locations of factory, sales offices and the place of operations of Altop are located in Shenzhen.

2. Are you aware of any programs of the Government of China, any of its agencies or any other authorized body, that benefits manufacturers of the goods that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program.)

ANSWER:

Altop is not aware of any programs of the Government of China, any of its agencies or any other authorized body, that benefits manufacturers of the goods that have not been accounted for in this questionnaire.

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

ANSWER:

This question is not applicable. Altop is not aware of such programs.

4. Indicate the type of program, for example:
 - the provision of grants, awards or prizes
 - the provision of goods or services at a reduced price (e.g. electricity, gas, transport)
 - the reduction of tax payable including income tax and VAT
 - reduction in land use fees
 - loans from Policy Banks at below-market rates or
 - any other form of assistance.

ANSWER:

This question is not applicable. Altop is not aware of such programs.

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

ANSWER:

This question is not applicable. Altop is not aware of any programs of the Government of China, any of its agencies or any other authorized body, that benefits manufacturers of the goods that have not been accounted for in this questionnaire.

Thus, the questions below are not applicable.

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

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

SECTION J DOMESTIC MARKET

J-1 Prevailing conditions of competition in the domestic market

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

ANSWER:

The overall condition of the domestic market has shown mixed trends over the past five years. The real estate sector has generally experienced a downward trend, which has affected demand in certain traditional construction segments. However, demand in the building services sector has shown some growth during the same period.

Overall, the domestic market remains competitive, with market conditions influenced by broader economic trends and changes in downstream construction activity.

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

ANSWER:

The sources of demand for the goods in the domestic market are mainly property developers and general contractors, who use the goods in construction and building projects.

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

ANSWER:

The property developers approximately accounts for 70% and general contractors approximately accounts for 30%.

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

ANSWER:

The most significant factor influencing demand variability in the domestic market is the situation of real estate market.

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

ANSWER:

Altop mainly operates in the South China market. Other than geographic differences, Altop does not identify any specific product or customer segmentations within the domestic market.

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

ANSWER:

Since Altop mainly operates in the South China market, the proportion of sales revenue 100% from the south China market.

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

ANSWER:

Altop does not have any knowledge about how produced goods and imported goods compete in the domestic market, so this question is not applicable.

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

ANSWER:

The goods are marketed in the domestic market mainly through public tendering processes. Altop does not distribute the goods through distributors and therefore does not have detailed knowledge of distribution channels beyond its own direct sales.

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

ANSWER:

Chinese aluminum doors and windows market is a total free market with adequate competitions, there are no such factors that are relevant to characteristics or influences on the domestic market.

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

ANSWER:

No such documentary evidence can be provided.

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

ANSWER:

Altop's domestic sales of the goods are limited, as its primary business in the domestic market is the provision of building services rather than standalone sales of the goods. Due to the limited scale of its domestic sales, Altop does not have sufficient knowledge of the overall domestic market structure for the goods and is therefore unable to provide a comprehensive market structure diagram.

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

ANSWER:

Altop's domestic sales of the goods during the investigation period were limited, as its primary activity in the domestic market is the provision of building services rather than standalone sales of the goods. Due to the limited scope of its domestic sales, Altop does not have sufficient knowledge of the commercially significant market participants at each level of trade in the domestic market for the goods.

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

ANSWER:

Altop's domestic sales of the goods during the investigation period were limited, as its primary activity in the domestic market is the provision of building services rather than standalone sales of the goods. Due to the limited scope of its domestic sales, Altop does not have sufficient knowledge of commercially significant importers in the domestic market for the goods, their market shares, countries of origin, or their levels of trade.

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

ANSWER:

As a company operates in this industry for a long time, it is Altop's understanding that the company comply with all the laws, regulations on competition, taxation, product standards. Also, Altop believes that aluminum doors and windows manufacture and sales are ordinary businesses without special government attention or intervention.

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

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

ANSWER:

Please note that there are adequate of competitions in the domestic market, based on Altop's understanding, there is no entry restriction for new participants into the Chinese market.

J-2 Goods in the domestic market

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

ANSWER:

In the domestic market, Altop offers mid- to high-end products among the like goods. These products are characterised by relatively high quality standards, comparatively higher prices, stable supply capability, and advanced technical performance.

Quality differences in the market are mainly reflected in materials, technical specifications and performance standards. Price differences generally correspond to differences in quality and technical requirements. Altop's products are positioned in the mid- to high-end segment and are typically supplied for projects with higher quality and technical requirements.

Product differentiation in the domestic market is primarily based on quality, technical specifications and project requirements. Private labels or premium labels are not a significant feature of Altop's domestic sales.

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

ANSWER:

In the domestic market, the goods are primarily used for installation in building facades. They are usually applied in construction projects as part of exterior building structures and facade systems.

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

ANSWER:

General speaking, Altop believes factors will influence the purchasing decisions include: the first is quality, the second is price, the third is timely delivery of goods and the fourth is the overall recognition/fame/history of the company by the industry.

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

ANSWER:

Based on Altop's understanding, there are no commercially significant substitutes for aluminum doors and windows.

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

ANSWER:

Based on Altop's understanding, there has not been any changes in market or consumer preferences in the domestic market for the goods in the last five years.

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

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

ANSWER:

During the investigation period, the domestic sales revenue of the goods accounts for approximately [Commercially Sensitive Information: proportion of domestic sales] % of Altop's total sales revenue of the goods. Please refer to [Exhibit J-3.1.1](#) for detailed information.

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

ANSWER:

Based on the cost and SG&A data for the domestic market and the Australian market during the investigation period, Altop has made an estimate of the profit generated from domestic sales of the goods.

During the IP, [Commercially Sensitive Information: proportion of domestic profits] % of Altop's total profit of the goods derived from the domestic market. Please refer to [Exhibit J-3.1.2](#).

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.

ANSWER:

Altop is not the price leader for the goods in the domestic market. To the best of its knowledge, there is no single price leader in the domestic market. Prices are determined through fair competition among market participants, typically based on project-specific requirements and tendering processes.

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

ANSWER:

Altop's products in the domestic market are positioned in the mid- to high-end segment. Pricing is determined on a project-by-project basis, considering specific technical requirements, quality standards and commercial conditions of each tender.

The primary pricing strategy is competition-based pricing. Prices are formulated with reference to competitive conditions in the relevant tender while also considering project costs and required margins. Competition-based pricing is the most important strategy applied.

There are no internal documents about product pricing.

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

ANSWER:

The selling prices of the goods in the domestic market are determined through the company's tendering process. The Business Department is responsible for preparing and submitting bids. The bid price is determined on a project-by-project basis, taking into account the specific project requirements, estimated costs and target profit margin.

Please note that there are no such internal documents.

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

ANSWER:

Altop primarily undertakes project-based business in the domestic market. As prices are determined separately for each project through tendering, there is no regular or periodic review of domestic selling prices.

Each project is priced independently based on specific project requirements, cost estimates and target profit margins. Accordingly, there is no formal price review mechanism. Pricing decisions are handled by the Business Department as part of the tendering process.

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

ANSWER:

Altop ranks the following factors in terms of their influence on domestic pricing decisions:

- a) Desired profit
- b) Purchase price of raw materials
- c) Cost to make and sell the goods
- d) Volume of the order
- e) Value of the order
- f) Customer relationship management
- g) Brand attributes
- h) Supplier relationship management
- i) Competitors' prices (not considered)
- j) Level of inventory (not considered)
- k) Value of forward orders (not considered)
- l) Volume of forward orders (not considered)

There are no other factors considered in domestic pricing decisions.

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

ANSWER:

In the domestic market, the selling price is determined based on the cost to make and sell the goods, plus a target profit margin.

During the investigation period, the company maintained its desired profit margin when determining selling prices.

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

ANSWER:

Altop did not offer any price reductions in the domestic market.

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

ANSWER:

Altop did not offer any bundled pricing in the domestic market.

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

ANSWER:

Yes. The volume of a particular project may influence the selling price in the domestic market. If a project requires a larger quantity of goods, the unit price may be slightly lower.

In such cases, pricing continues to be based on estimated costs and the desired profit margin. For higher-volume projects, economies of scale and more efficient allocation of fixed costs may allow for a relatively lower unit price while still maintaining the company's target profit margin. Please note that here are no such internal documents.

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

ANSWER:

During the investigation period, Altop sold the GUC to only one domestic customer, i.e., [Commercially Sensitive Information: domestic customer information]. This customer is a project-based client, and the arrangement was governed by an overall project agreement rather than a product sales contract.

Accordingly, Altop does not use sales contracts for the sale of the goods in the domestic market. Therefore, questions (a) to (g) are not applicable.

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

ANSWER:

Please note that Altop does not have any price lists for the goods used in the domestic market.

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

ANSWER:

In general, Altop determines prices for each customer individually. Prices are set based on raw material costs, manufacturing costs, ensuring that the selling price reflects current production costs and estimated profits. Products are not grouped into fixed categories for pricing; instead, each project is evaluated on a case-by-case basis. Any differences in manufacturing or selling costs between products, such as variations in dimensions or material usage, are taken into account when determining the final price.

Please note that there are no internal documents specifically supporting domestic price differentiation.

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

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

ANSWER:

Altop does not tier or segment its domestic customers for pricing purposes. All customers are treated on an individual basis, and prices are determined primarily based on manufacturing costs and specific order requirements, rather than any pre-defined customer categories or trade levels.

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

ANSWER:

No, Altop does not sell the goods to any related entities in the domestic market, this question is not applicable.

J-4 Marketing and sales support in the domestic market

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

ANSWER:

In the domestic market, Altop markets the goods as mid-end to high-end products, emphasizing superior quality and reliable performance. The company's value proposition focuses primarily on product quality, rather than low pricing.

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

ANSWER:

No. Altop does not conduct brand segmentation in the domestic market for the goods.

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

ANSWER:

Over the past five years, Altop has not promoted its products in the domestic market, this question is not applicable.

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

ANSWER:

Altop's domestic market sales team consists of approximately [Commercially Sensitive Information: number of employees] employees. The team is nominally based in Shenzhen.

Sales staff are remunerated through a combination of base salary and commission. Commissions are calculated based on individual sales performance.

During the investigation period, Altop does not have internal documents specifically supporting the remuneration structure for domestic sales staff.

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

ANSWER:

Altop operates on a project-based model. Pricing is determined through the internal tendering and project evaluation process, rather than through direct negotiation by sales staff.

Accordingly, no specific pricing parameters are provided to sales staff for establishing prices when negotiating with customers. Pricing decisions are made by the Business Department based on project requirements, estimated costs and target profit margins. There are no internal documents relevant to this question.

SECTION K AUSTRALIAN MARKET

K-1 Prevailing conditions of competition in the Australian market

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

ANSWER:

Over the past five years, the overall Australian market for the goods has shown an expansion trend. Market growth has been supported by residential construction initiatives, including the Australian Government's housing programs, as well as infrastructure and construction activities associated with the Brisbane 2032 Summer Olympics. These factors have contributed to increased construction activity and demand for building-related products.

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

ANSWER:

The primary sources of demand in Australia are property developers and builders (including head contractors).

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

ANSWER:

Developers: approximately 10%; Builders/head contractors: approximately 90%

- (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

ANSWER:

Demand in Australia is influenced by government housing initiatives and large-scale construction and infrastructure projects, including those related to the Brisbane 2032 Summer Olympics. Broader economic conditions and construction cycles also affect demand levels.

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

ANSWER:

The Australian market is primarily segmented geographically, including: Brisbane (Queensland); Sydney (New South Wales); Melbourne (Victoria); Perth (Western Australia); Other regions.

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

ANSWER:

Queensland (QLD): approximately 22%; Victoria (VIC): approximately 60%; New South Wales (NSW): approximately 14%; Western Australia (WA): approximately 4%.

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

ANSWER:

Both Australian-manufactured and imported goods compete primarily through project-based tendering processes. Competition is conducted on a project-by-project basis, with price and technical compliance being key considerations.

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

ANSWER:

The goods are marketed mainly through participation in project tendering. Altop does not use distributors in Australia and supplies directly for project-based contracts.

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

ANSWER:

Please note that there are no such factors that are relevant to characteristics or influences on the market for the goods in Australia.

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

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

ANSWER:

Please refer to [Exhibit K-1.2](#) for the diagram.

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

ANSWER:

Altop's sales in the Australian market during the investigation period were obtained through project-based tendering.

Due to the nature of the tendering process, Altop does not have access to detailed information regarding other market participants involved in specific projects, including their identities, levels of trade, degree of vertical or horizontal integration, or market shares.

Accordingly, Altop is not in a position to provide a comprehensive description of commercially significant market participants at each level of trade in the Australian market.

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

ANSWER:

Altop does not have information regarding the identities of commercially significant importers in the Australian market for the goods, their respective market shares, the countries from which they import, or their levels of trade.

As Altop's sales in Australia are conducted on a project-by-project tender basis, it does not have access to such market-wide information.

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

ANSWER:

Altop is not aware of any specific regulatory framework in Australia that is uniquely applicable to the goods under consideration in terms of competition policy, taxation or restrictions on the range of goods. The goods are subject to general Australian laws and regulations that apply to all market participants.

In relation to product standards, the window wall products supplied by Altop are generally required to comply with AS/NZS 4284:2008, which sets out testing requirements for building façades in Australia and New Zealand. Compliance with this standard is typically required as part of project specifications and building approval processes.

Please refer to [Exhibit K-1.5](#) for detailed information.

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

ANSWER:

In Altop's view, there is no such entry restrictions except for meeting the product standard, so this question is not applicable.

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

Please refer to [Exhibit K-1.5](#) for detailed information.

K-2 Goods in the Australian market

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

ANSWER:

In the Australia market, Altop offers mid- to high-end products among the like goods. These products are characterised by relatively high quality standards, comparatively higher prices, stable supply capability, and advanced technical performance.

Quality differences in the market are mainly reflected in materials, technical specifications and performance standards. Price differences generally correspond to differences in quality and technical requirements. Altop's products are positioned in the mid- to high-end segment and are typically supplied for projects with higher quality and technical requirements.

Product differentiation in the domestic market is primarily based on quality, technical specifications and project requirements. Private labels or premium labels are not a significant feature of Altop's domestic sales.

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

ANSWER:

The goods are generally used in building facade applications.

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

ANSWER:

The key product attributes that influence purchasing decisions in the Australian market are ranked as follows (from most important to least important):

- a) Quality and technical compliance – including compliance with applicable Australian standards and project specifications.
 - b) Price – competitiveness of the bid price in project tendering.
 - c) Performance and delivery capability – including the ability to meet project timelines, provide reliable supply and fulfil contractual obligations.
4. Identify if there are any commercially significant market substitutes in the Australian market for the goods.

ANSWER:

In the Australian market, there are no commercially significant substitutes for the goods.

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

ANSWER:

Based on Altop's understanding, there are no commercially significant market complements for the goods in the Australian market.

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

ANSWER:

There are no changes in market or consumer preferences for the goods over the past five years.

K-3 Relationship between price and cost in Australia

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

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

ANSWER:

During the investigation period, approximately [Commercially Sensitive Information: proportion of Australia sales] % of Altop's total sales revenue from the goods was derived from sales to Australia.

Please refer to [Exhibit K-3.1.1](#) for the supporting documents.

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

ANSWER:

Based on the cost and SG&A data for the domestic market and the Australian market during the investigation period, Altop has made an estimate of the profit generated from Australia sales of the goods.

During the IP, [Commercially Sensitive Information: proportion of Australia profit] % of Altop's total profit of the goods derived from the Australia market. Please refer to [Exhibit K-3.1.2](#).

In responding to question 1 please provide evidence supporting calculations.

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

ANSWER:

Altop is not the price leader in the Australian market. To the best of its knowledge, there is no single identifiable price leader in the market. Prices are generally determined through project-based tendering, and Altop does not have information regarding any specific company acting as a price leader.

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

ANSWER:

In the Australian market, Altop's products are positioned in the mid- to high-end segment. Pricing is determined on a project-by-project basis through tendering.

The primary pricing strategy is competition-based pricing, which is ranked as the most important factor. Prices are formulated with reference to competitive tender conditions, while also taking into account project-specific costs and the company's target profit margin.

Altop does not adopt market penetration, inventory clearance, price skimming, bundle pricing or dynamic pricing strategies in Australia. There are no different pricing strategies for different products; pricing is determined consistently based on competitive tendering for each project.

There are no relevant documents available.

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

ANSWER:

Selling prices in the Australian market are determined through project-based tendering. For each project, the company prepares a bid based on estimated production and supply costs, project-specific technical and contractual requirements, and a target profit margin. The final bid price is submitted as part of the competitive tender process.

There are no separate internal policy documents specifically setting out the pricing process, as pricing is determined on a project-by-project basis through the tender evaluation procedure.

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

ANSWER:

Altop operates on a project-based model in the Australian market. Selling prices are determined separately for each project through the tendering process.

Accordingly, there is no regular or periodic review of Australian selling prices. Each project is priced independently based on estimated costs, project requirements and the target profit margin. Pricing decisions are made as part of the internal tender evaluation process by the relevant personnel within the Business Department.

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

ANSWER:

Altop ranks the following factors in terms of their influence on Australia market pricing decisions:

- a) Desired profit
- b) Purchase price of raw materials
- c) Cost to make and sell the goods
- d) Volume of the order
- e) Value of the order
- f) Customer relationship management
- g) Brand attributes
- h) Supplier relationship management
- i) Competitors' prices (not considered)
- j) Level of inventory (not considered)
- k) Value of forward orders (not considered)

l) Volume of forward orders (not considered)

There are no other factors considered in pricing decisions.

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

ANSWER:

The selling price of the goods in the Australian market is primarily determined based on the costs and estimated profits.

Altop maintains a target profit margin of approximately [Commercially Sensitive Information: profit margin of Australia sales] on the goods. Please refer to [Exhibit K-3.7](#) for the supporting documents.

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

ANSWER:

Altop does not offer price reductions in the Australian market, so this question is not applicable.

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

ANSWER:

Altop does not offer bundled pricing in the Australian market, so this question is not applicable.

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

ANSWER:

Yes. The size of an order may influence the selling price. For projects involving larger quantities, the unit price may be relatively lower.

In such cases, pricing continues to be based on estimated production and supply costs together with the company's target profit margin. Larger volumes may allow for more efficient allocation of fixed costs and improved production efficiency, which can support a relatively lower unit price while maintaining the desired profit margin.

There are no specific internal policy documents governing volume-based pricing, as prices are determined on a project-by-project basis through the tendering process.

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

ANSWER:

Yes, Altop uses sales contracts in the Australian market, all sales revenue come from contracted sales.

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

ANSWER:

No, Altop did not offer exclusivity contracts.

- (c) How frequently are sales contracts renegotiated?

ANSWER:

There won't be any renegotiation after the sales contract is signed.

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

ANSWER:

Since the purchase price of Altop's goods vary from project to project, the sales price is correspondingly adjusted for each project. In this sense, price reviews are conducted on a per-project basis, rather than at fixed intervals.

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

ANSWER:

There won't be any renegotiation after the sales contract is signed, except for that there is huge change in product price.

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

ANSWER:

Yes, if there is a big change of costs to sell varies to certain extent, there is a possibility to review price.

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

ANSWER:

In general, Altop and its customers first execute a Proforma Invoice, which sets out the key terms of the transaction. Altop considers that the Proforma Invoice serves the function of a contract between the parties.

During the investigation period, Altop had contracts with the following customers in Australia:

List of customers under contract during the investigation period in Australia market
[Commercially Sensitive Information: Australia customer name]

[Commercially Sensitive Information: Australia customer name]
[Commercially Sensitive Information: Australia customer name]

Copies of the two largest contracts in terms of sales revenue, are provided in [Exhibit B-3.1.a](#) and [Exhibit B-3.1.b](#).

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

ANSWER:

Please note that Altop does not have any price lists for the goods used in the Australian market, so this question is not applicable.

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

ANSWER:

Pricing differentiation among different products or models in the Australian market is primarily based on differences in production and supply costs.

Products are grouped according to their specific project requirements and technical specifications. Cost differences may arise from variations in size, design complexity, processing techniques, material inputs and performance requirements. These factors directly affect the cost to manufacture and supply the goods.

When determining prices, the company first estimates the total cost for the product configuration required for a project. The selling price is then established by adding the target profit margin to the estimated cost. Accordingly, higher production or material costs will generally result in higher quoted prices.

There are no separate internal policy documents specifically governing product-based price differentiation, as pricing is determined on a project-by-project basis through the tendering process.

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

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

ANSWER:

Altop does not tier or segment its Australian customers for pricing purposes.

All sales in the Australian market are conducted through project-based tendering. Pricing is determined on a project-by-project basis, taking into account the specific technical requirements, estimated costs and target profit margin for each project. There is no differentiation in pricing based on customer tiers or segments.

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

ANSWER:

Yes.

Prices for related party transactions are determined based on the purchase prices of the products, together with Altop's operating costs and a reasonable profit margin.

Altop sells the goods to its related entity in Australia, [Commercially Sensitive Information: name of related company], [Commercially Sensitive Information: sales proportion from related company] of Altop's sales revenue in Australia is derived from sales to its related entity.

For proportion of Altop's sales to related parties, please refer to [Exhibit K-3.15](#) for detailed information.

K-4 Marketing and sales support in the Australian market

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

ANSWER:

In the Australian market, Altop's value proposition focuses on mid- to high-end product positioning, emphasizing quality, compliance with Australian standards, reliability and project delivery capability. Competitive pricing in the context of tendering is also an important element, but the primary emphasis is on product quality and the ability to meet project specifications and timelines.

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

ANSWER:

No, Altop does not conduct brand segmentation in the Australian market for the goods, this question is not applicable.

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

ANSWER:

This question is not applicable, since Altop have not conducted advertising of the goods nor promotion campaigns over the past five years.

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

ANSWER:

Altop has [Commercially Sensitive Information: number of employees] personnel responsible for Australian sales, all of whom are located in Shenzhen, China.

In general terms, they are remunerated through a combination of a fixed base salary and performance-based commission. The commission component is linked to sales performance, typically based on the value of successfully secured projects.

There are no specific internal policy documents governing the remuneration structure beyond standard employment 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.

ANSWER:

Altop operates on a project-based model in the Australian market. Pricing is determined through the internal tender evaluation process rather than through direct negotiation by sales staff.

Accordingly, no specific pricing parameters are provided to sales staff to establish prices when negotiating with customers. Pricing decisions are made by the Business Department based on project requirements, estimated costs and the target profit margin for each project.

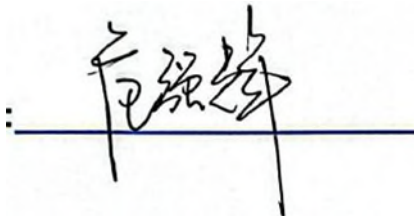
There are no separate internal policy documents specifically governing this process, as pricing is determined on a project-by-project basis through tendering.

EXPORTER'S DECLARATION

I hereby declare that **Altop Facade Co., Limited** 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 : **Qianhui Wei**

Signature :

A handwritten signature in black ink, appearing to be 'Qianhui Wei', is written over a horizontal line. The signature is stylized and somewhat cursive.

Position in

Company : **Director**

Date : **March 10, 2026**

APPENDIX

GLOSSARY OF TERMS

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

Adjustments

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

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

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

Arms length

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

Constructed value

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

Cost of production/manufacturing

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

Cost to make and sell

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.

Country of origin

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

Date of sale

The commission will normally use the invoice date as recorded in the exporter or producer's records. Another date may be used if this better reflects the material terms of sale. The questionnaire directs attention to matching data sets of domestic and export sales where some other date is used, as well as matching cost information. Note that any date of sale claim, other than the invoice date, that is made after submitting a response to this questionnaire may not provide the commission with sufficient time to assess the claim and may not be considered.

Direct labour cost

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

Dumping

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

Dumping margin

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

Export price

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

Exporting country

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

Factory overheads

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

Goods under consideration (the goods)

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

Incoterms

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

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the sellers premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required)
FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc. payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance)
	the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CPT	carriage paid to
CIP	carriage and insurance paid to
	the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried

	by air, road, rail etc.
DAF	delivered at frontier (goods carried by rail or road and cleared for export at the named place at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer's disposal)
DES	delivered ex ship (goods made available to the buyer on board the ship uncleared for import at the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc. incurred upon importation)

The period

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

Like goods

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

Normal value

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

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

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

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

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

Ordinary course of trade

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

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

Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where

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

Selling, general and administration expenses (SG&A)

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

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

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