



Anti-Dumping Commission

Exporter Questionnaire

Case number: 696

Product: Certain concrete underlay film

From: Malaysia

Inquiry period: 1 January 2025 – 31 December 2025 (the period)

Response due by: 11 March 2026

Email enquiries to: investigations3@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 a continuation inquiry into certain concrete underlay film exported to Australia from Malaysia.

The commission will use the information you provide to determine normal values and export prices over the inquiry period (the period). This information will determine whether exports of certain concrete underlay film are dumped.

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

If you do not manufacture the goods

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

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

What happens if you do not respond to this questionnaire?

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

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

Extension requests

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

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

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

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

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

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

Submitting a response to the exporter questionnaire

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

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

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

Confidential and non-confidential responses

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

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

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

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

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

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

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

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

Verification of the information that you supply

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

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

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

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

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

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

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

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

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

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

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the commission's verification of your data.
- If you cannot present electronic data in the requested format contact the commission as soon as possible.
- Where possible, electronic data should be shared with the commission via SIGBOX, a secure online document repository. Please contact the commission to request access to SIGBOX if required.

CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A Company information	<input checked="" type="checkbox"/>
Section B Export sales to Australia	<input checked="" type="checkbox"/>
Section C Exported goods & like goods	<input checked="" type="checkbox"/>
Section D Domestic sales	<input checked="" type="checkbox"/>
Section E Due allowance	<input checked="" type="checkbox"/>
Section F Third country sales	<input checked="" type="checkbox"/>
Section G Cost to make and sell	<input checked="" type="checkbox"/>
Section H Domestic Market	<input checked="" type="checkbox"/>
Section I Australian Market	<input checked="" type="checkbox"/>
Exporter's declaration	<input checked="" type="checkbox"/>
Non-confidential version of this response	<input checked="" type="checkbox"/>

PUBLIC RECORD

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	<input checked="" type="checkbox"/>
B-2.2 Australian sales source	<input checked="" type="checkbox"/>
B-4 Upwards sales	<input checked="" type="checkbox"/>
D-2 Domestic sales	<input checked="" type="checkbox"/>
D-2.2 domestic sales source	<input checked="" type="checkbox"/>
F-2 Third country sales	<input checked="" type="checkbox"/>
F-2.2 third country sale source	<input checked="" type="checkbox"/>
G-3 Domestic CTM	<input checked="" type="checkbox"/>
G-3.2 domestic CTM source	<input checked="" type="checkbox"/>
G-4.1 SG&A listing	<input checked="" type="checkbox"/>
G-4.2 Dom SG&A calculation	<input checked="" type="checkbox"/>
G-4.3 Upwards SG&A	<input checked="" type="checkbox"/>
G-5 Australian CTM	<input checked="" type="checkbox"/>
G-5.2 Australian CTM source	<input checked="" type="checkbox"/>
G-7.2 Raw material CTM	<input checked="" type="checkbox"/>
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>
G-8 Upwards costs	<input checked="" type="checkbox"/>
G-10 Capacity Utilisation	<input checked="" type="checkbox"/>

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

Black or grey, or any colour variations of black or grey, concrete underlay film (also marketed as builders' film), manufactured from either recycled and/or virgin resins, with a thickness ranging between 150-230 microns, and a width from 1-7 metres.

Model Control Code

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

	Category	Sub-category	Identifier	Sales Data	Cost Data
1.	Impact resistance	Other – Construction / Industrial grade	O	Mandatory	Mandatory
		Medium	M		
		High	H		
2.	Actual thickness	150 – 179 microns	A1	Mandatory	Mandatory
		180 – 230 microns	A2		
3.	Nominal thickness	150 – 179 microns	N1	Mandatory	Optional
		180 – 230 microns	N2		

In constructing a MCC, use a '-' between each category. For example: O-A1-N2

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

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

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name : Mr. Ang Say Meng
Position in the company : [Confidential information on contact person]
Telephone : [Confidential information on contact person]
E-mail address : [Confidential information on contact person]

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

Australian Representative

Name : Ms. Melissa Guilfoyle
Address : Longton Blackwell, Level 5, 179 Turbot Street, Brisbane QLD 4000, Australia.
Telephone : 07 2142 3390
E-mail address : melissa.guilfoyle@longtonblackwell.com.au

Malaysian Representative

Name : Mr. Manshan Singh / Ms. Ho Pui Yan / Mr. Chong Zheng Yang
Address : Skrine Advocates & Solicitors, Level 8, Wisma UOA Damansara, 50 Jalan Dungun, Damansara Heights, 50490 Kuala Lumpur, Malaysia.
Telephone : +60 3 2081 3999 ext. 746
E-mail address : manshan.singh@skrine.com / ho.pui.yan@skrine.com / zhengyang@skrine.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 where your company's financial records are held.
[Lot 86037, No. 9, Jalan Kampung Orang Asli Kuang, 48000 Rawang, Selangor Darul Ehsan, Malaysia.](#)
4. Please provide the location of where your company's production records are held.
[Lot 86037, No. 9, Jalan Kampung Orang Asli Kuang, 48000 Rawang, Selangor Darul Ehsan, Malaysia.](#)
5. Please provide the location of your company's production plant manufacturing the goods under consideration.
[Lot 86037, No. 9, Jalan Kampung Orang Asli Kuang, 48000 Rawang, Selangor Darul Ehsan, Malaysia.](#)

A-2 Company information

1. What is the legal name of your business?
[Great Cosmo Industries Sdn. Bhd. \(hereinafter referred to as "GCI"\).](#)
2. Does your company trade under a different name and/or brand? If yes, provide details.
[No.](#)
3. Was your company ever known by a different legal and/or trading name? If yes, provide details.
[No.](#)

4. Provide a list of your current board of directors and any changes in the last two years.
GCI's current Board of Directors comprises the following individuals: [names of directors]. There have been no changes to the Board of Directors in the last two years.
5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)?
No.
- If yes, provide:
(a) A diagram showing the complete ownership structure and
(b) A list of all related companies and its functions
Not applicable.
6. Is your company or parent company publicly listed?
No.
- If yes, please provide:
(a) The stock exchange where it is listed and
(b) Any principal shareholders¹
Not applicable.
- If no, please provide:
(c) A list of all principal shareholders and the shareholding percentages.
[Names of shareholders] are [number of] shareholders of GCI. [Confidential information on company's shareholding].
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.
GCI was incorporated on [date] and is engaged in the business of manufacturing the goods under consideration and other products.
- GCI operates a [scale of operations] operation with a maximum production capacity of approximately [volume] of concrete underlay film per annum and exports these goods to Australia and other markets such as [other countries]. In addition to the goods under consideration, GCI also produces other products such as [type of other products].
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.
Not applicable. GCI performs all of the functions above in relation to the goods under consideration.
9. Provide your company's internal organisation chart.
Please refer to the chart below.
- [Confidential chart on company's internal organisation]
10. Describe the functions performed by each group within the organisation.
[Confidential information on company's internal functions].
11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.

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.

Yes. Please refer to [Annexure A-2.11.a](#) for GCI's Company Profile and [Annexure A-2.11.b](#) for GCI's product catalogue for [name of product].

A-3 General accounting information

1. What is your financial accounting period?
1 October to 30 September.
2. Are your financial accounts audited? If yes, who is the auditor?
Yes. GCI's current auditor is [name of auditor].
3. What currency are your accounts kept in?
Ringgit Malaysia ("RM").
4. What is the name of your financial accounting system?
[Name of system].
5. What is the name of your sales system?
[Name of system].
6. What is the name of your production system?
[Name of 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.
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.
No. GCI's accounting practices are in accordance with the generally accepted accounting principles in Malaysia.
9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.
No.

A-4 Financial Documents

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

Audited financial statements for the period of: (a) 1 October 2022 to 30 September 2023 and (b) 1 October 2023 to 30 September 2024 are provided as [Annexure A-4.1.a](#) and [Annexure A-4.1.b](#) respectively.

Financial statements for the period of 1 October 2024 to 30 September 2025 have not yet been audited and are scheduled for audit on [date]. The current unaudited accounts (balance sheet and income statement) are provided as [Annexure A-4.1.c](#).

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.
There are no audit management letters per se. However, Independent Auditor's Reports are included as part of the audited financial statements in A-4.1. Please refer to pages 4 to 4.3 of the audited financial statements for FYE 30 September 2023 and pages 7 to 11 of the audited financial statements for FYE 30 September 2024.
3. If the financial statements in A-4.1 are unaudited, provide for each company:
(a) the tax returns relating to the same period and

- (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.

Not available as company taxes are only payable after the financial statements have been audited and filed.

- 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.

No.

- 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.

Please refer to **Annexure A-4.5.a** for the income statement for the period (i.e. 1 January 2025 to 31 December 2025), and **Annexure A-4.5.b** for the income statement for the most recent financial year (i.e. 1 October 2024 to 30 September 2025).

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

Please refer to **Annexure A-4.6.a** for the trial balance for the period (i.e. 1 January 2025 to 31 December 2025), and **Annexure A-4.6.b** for the trial balance for the most recent financial year (i.e. 1 October 2024 to 30 September 2025).

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

Please refer to **Annexure A-4.7** for the chart of accounts.

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

SECTION B EXPORT SALES TO AUSTRALIA

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
GCI conducts [confidential information on company's marketing and advertising efforts].
 - (b) Price determination and/or negotiation process
Prices are [confidential information on company's price determination / negotiation process].
 - (c) Order placement process
See (b) above.
 - (d) Order fulfilment process and lead time
[Confidential information on lead time].
 - (e) Delivery terms and process
Delivery terms are [confidential information on delivery terms and process].
 - (f) Invoicing process
[Confidential information on invoicing process].
 - (g) Payment terms and process
See (f) above.
2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:
Invoices are generally issued in Australian Dollars (AUD). On occasion, invoices may be issued in United States Dollars (USD) for specific customers.
 - (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details
Yes. Payments from customers are received into GCI's AUD account or USD account.
 - (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details
No.
 - (c) How is the exchange rate determined in your accounting system and how often is it updated?
The exchange rate in GCI's accounting system is based on the rate reported in [confidential information on exchange rate applied by the company].
3. Are there any customers of the goods exported to Australia related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.
No.
4. If sales are in accordance with price lists or price extras list, provide copies of these lists.
Not applicable.
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.

Not applicable.

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

No.

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

During the period, GCC has issued [number] of credit notes in respect of its Australian sales, as follows:

[Confidential information on credit notes issued].

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

- (a) Are you claiming a date other than the invoice date as the date of sale?

No. The date of sale is reported as the invoice date.

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

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

Not applicable.

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

B-2 Australian sales listing

1. Complete the worksheet named "B-2 Australian sales"
- This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
 - This worksheet must also include exports of the goods that have been exempted from anti-dumping duties under 8(7porce) and section 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975*.
 - 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.

Please refer to [Table B-2](#).

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

Please refer to [Table B-2.2](#).

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.

Please refer to [Annexure B-3.1](#) for [invoice number] and [Annexure B-3.2](#) for [invoice number].

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.

Please refer to the sample documents in [Annexure B-3.1](#) and [Annexure B-3.2](#).

B-4 Reconciliation of sales to financial accounts

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

Please refer to [Table B-4](#).

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.

Please refer to [Annexure B-4.2](#).

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.

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.

Specifications and details provided in Extrusion Process Flow in **Annexure C-1-1(a)** and Builders Firm Technical Data Sheet in **Annexure C-1-1(b)**. GCI has also provided its SIRIM (Standard and Industrial Research Institute of Malaysia) test report in **Annexure C-1-1(c)**.

GCI's goods comply with AS 2810 standards, and GCI undertakes its own testing on the goods before the same are sent out.

Notwithstanding that the defined product scope is limited to black and grey products, it should be noted that, in the domestic and export sales tables, GCI has reported sales of products of all colours. This is because the colour variation is merely a matter of customer preference and does not give rise to any material differences. Concrete underlay films of different colours are functionally identical and substitutable with one another (i.e. like products).

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.

No.	MCC
1.	H-A2-N2
2.	M-A2-N2
3.	O-A2-N2

Note: "O" refers to products without impact classification.

C-2 Models sold in the domestic market

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

Please refer to the documents attached in C-1.1 above.

Notwithstanding that the defined product scope is limited to black and grey products, it should be noted that, in the domestic and export sales tables, GCI has reported sales of products of all colours. This is because the colour variation is merely a matter of customer preference and does not give rise to any material differences. Concrete underlay films of different colours are functionally identical and substitutable with one another (i.e. like products).

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.

No.	MCC
1.	O-A1-N1

2.	O-A2-N2
3.	M-A2-N2

C-3 Internal product codes

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

Yes. GCI utilises a comprehensive range of product codes to categorise its products based on [confidential information on product coding methodology].

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.

GCI's product codes consist of [confidential information on product coding methodology]. For example, the product code [product code] is structured as follows:

[confidential information on product coding methodology]

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

For the purpose of completing this questionnaire, the product codes were mapped to the MCC based on the thickness specification embedded within [confidential information on product coding methodology]. The MCC covers products with a thickness range of 150 to 230 microns. Accordingly, any product code containing a thickness value that falls within the 150 to 230 range was identified as qualifying under the MCC and was included in the reported list.

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

[Confidential information on internal product codes]

If no:

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

Not applicable.

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:
GCI does not have any related entities. All domestic sales are carried out through [confidential information on domestic sales process]. GCI sells its local products to [type of customer]. In addition, [names of GCI's employees] handle their own respective customer portfolios and are responsible for managing sales to those customers.

[Confidential information on customer portfolios].
 - (a) Marketing and advertising activities
GCI carries out [confidential information on company's marketing and advertising efforts].
 - (b) Price determination and/or negotiation process
Price determination and/or negotiation process are done [confidential information on company's sales].
 - (c) Order placement process
Orders are typically placed through [confidential information on company's sales].
 - (d) Order fulfilment process and lead time
[Number of days] depending on the size and volume of the products ordered.
 - (e) Delivery terms and process
[Confidential information on company's sales process].
 - (f) Invoicing process
[Confidential information on company's sales process].
 - (g) Payment terms and process
[Confidential information on company's sales process].
2. Are any domestic customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.
No domestic customers are related to GCI.
3. If sales are in accordance with price lists or price extras list, provide copies of these lists.
No price lists or price extras list for domestic sales are maintained by GCI. All prices are [confidential information on company's sales process].
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.
GCI's domestic selling prices does not vary according to the distribution channel identified.
5. Did you provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the customer to obtain the discount and/or rebate.
No 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 are provided by GCI.
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.

No. GCI did not issue any credit or debit notes for domestic sales 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:

(a) Are you claiming a date other than the invoice date as the date of sale?

No, GCI adopts the invoice date as the date of sale.

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

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

Not applicable.

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

D-2 Domestic sales listing

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

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

Please refer to [Table D-2](#).

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

Please refer to [Table D-2.2](#).

D-3 Sample domestic sales documents

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

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

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

Please refer to [Annexure D-3.1\(a\)](#) for [invoice number] and [Annexure D-3.1\(b\)](#) for [invoice number]. Please also refer to [Annexure D-3.1\(c\)](#) for [invoice number] and [Annexure D-3.1\(d\)](#) for [invoice number].

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.
Please refer to the sample documents in [Annexure D-3.1\(a\)](#), [Annexure D-3.1\(b\)](#), [Annexure D-3.1\(c\)](#) and [Annexure D-3.1\(d\)](#).

D-4 Reconciliation of sales to financial accounts

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

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

SECTION E DUE ALLOWANCE

E-1 Credit expense

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

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

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

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

Please refer to [Annexure E-1.1](#) for the relevant credit expense calculation.

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

Yes, GCI has several overdraft facilities denominated in Malaysian Ringgit (RM). The facilities are as follows:

[Confidential list of facilities]

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

Yes, GCI has several fixed deposits denominated in Malaysian Ringgit (RM). The deposits are as follows:

[Confidential list of deposits]

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?

GCI does not have short term borrowings or an overdraft facility denominated in the same foreign currency.

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

GCI does not have any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in the same foreign currency.

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?
The packaging used for GCI's domestic sales of like goods is [type of packaging].
2. What is the packaging used for your export sales of the goods to Australia?
The packaging used for GCI's export sales of the goods to Australia is [type of 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

Not applicable as there is no difference in packaging between export and domestic packaging.

E-3 Delivery

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

Yes, GCI provides customers with delivery options [confidential information on GCI's delivery process and costs].
2. What are the delivery terms of the export sales of the goods to Australia?

Export sales to Australia are made on [delivery terms].
3. If the delivery terms of the Australian sales includes delivery to the port, how was the inland transport calculated in the Australian sales listing in B-2?

If the delivery terms of the Australian sales include delivery to the port, the inland transport cost reported in Table B-2 represents haulage charges billed to GCI by its haulage vendor, which are subsequently recovered from customers.
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?

Port handling charges reflect the forwarding costs charged by the appointed forwarding agents and these charges incurred are covered by customers.
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?

Ocean freight charges cost is provided by the shipper on a per container basis.
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?

Not applicable as there is no marine insurance.
7. If the delivery terms of the Australian sales includes delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?

Not applicable as there is no 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.

Yes. GCI pays sales commissions to [salesperson]. The commission is calculated based on the individual sales generated by [salesperson].
2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:

Yes, for domestic sales, GCI is subject to Sales and Service Tax ("SST") under Malaysian law; for export sales, SST is not applicable.

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

In Malaysia, there is no value-added tax per se. Instead, the SST applies. For domestic products, the SST rate is 10% for sheet and 5% for tubing. SST is exempted if customers present a valid tax exemption certificate.
 - How is VAT accounted for in your records in relation to sales of the goods and like goods?

Under sales tax

In Malaysia, there is no value-added tax per se. SST is recorded in GCI's accounting system and on each invoice if there is any.

- Do you receive a VAT refund in relation to sales of the goods and/or like goods?
GCI does not 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?
GCI 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?
No, the direct selling expenses incurred by GCI are those reported in **Table D-2**.
4. Are there any other direct selling expenses incurred by your company in relation to export sales of the goods to Australia?
No, the direct selling expenses incurred by GCI are those reported in **Table B-2**.

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.
No.

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.
No.
2. Are there any third country customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.
No third country customers are related to GCI.
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:
GCI adopts the invoice date 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.

Not applicable.

F-2 Third country sales listing

1. Complete the worksheet named "F-2 Third country sales"
 - This worksheet lists all export sales, summarised by country, customer and MCC, to third countries of like goods invoiced within the period.
 - While sales may be made in different currencies and on different shipping terms the sales listing also seeks to record an Ex-works value of these sales in your local currency.
 - If you have claimed in F-1.3 that the date of sale is one other than the invoice date, then add sales with your claimed date of sale.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
Please refer to **Table F-2**.
2. Complete worksheet "F-2.2 third country sales source" listing the source of the data for each column in the worksheet "F-2 third country sales".
Please refer to **Table F-2.2**.

F-3 Differences in sales to third countries

1. Are there any differences in sales to third countries which may affect their comparison to export sales to Australia? If yes, provide details.
No.

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.

[Confidential diagram on extrusion process flow]

For scrap, GCI [confidential information on scrap handling].

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

No suppliers are related to GCI.

G-2 Cost accounting practices

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

Actual costs.

2. If your company uses standard costs:

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

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

(c) How were those variances allocated?

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

Not applicable.

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

GCI determines product cost based on [confidential information on cost accounting practices].

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

Yes, in GCI's accounting system, there are [number of] sections, each functioning as a separate cost centre:

[Confidential information on cost centres]

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

[Confidential information on cost accounting practices].

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

No costs for management accounting purposes valued differently to financial accounting purposes.

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.

No engagement by GCI in any start-up operations in relation to the goods.

8. What is the method of valuation for raw material, work-in-progress, and finished goods inventories (e.g. last in first out –LIFO, first in first out- FIFO, weighted average)?
[\[Confidential information on cost accounting practices\]](#).
9. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production?
[Not applicable as wasted goods will be sent to recycle processing into raw material.](#)
10. What are the valuation methods for scrap, by products, or joint products?
[In the blow-film process, scrap, waste and by products are produced. These materials will \[confidential information on product handling\]](#).

[In practice, GCI does not assign a commercial value to scrap or by products. Internally, they are treated as \[confidential information on cost accounting practices\]](#).
11. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details
[Not applicable.](#)

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.

[Please refer to Table G-3.](#)
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".
[Please refer to Table G-3.2.](#)

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.

Please refer to [Table G-4.1](#).

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

Please refer to [Table G-4.3](#).

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

Please refer to [Annexure A-4.5.a](#) and [Annexure A-4.5.b](#).

G-5 Cost to make the goods exported to Australia

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

Please refer to [Table G-5](#).

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

Please refer to [Table G-5.2](#).

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

Raw material cost is calculated by multiplying the quantity (i.e. KG weight) of the raw material with the average cost / price. Where the raw material is both purchased externally and produced in house, the average cost / price is calculated based on both the in house CTM and purchase price; whereas if the raw material is only purchased externally, the average cost / price is calculated based on the average purchase price. Please refer to [Annexure G-6.1](#) for the raw material calculation file for calculation of the average cost / price. The weight of the raw material is based on actual weight recorded in GCI's accounting system.

- (b) Labour
Allocated based on production quantity.
- (c) Manufacturing overheads
Allocated based on production quantity.

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.

Workings for allocation of labour cost and manufacturing overheads are in **Table G-3** and **Table G-5**.

G-7 Major raw material costs

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

[Confidential table on weighted average percentage of raw materials based on total cost to make]

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

For [type of raw material], please refer to **Annexure G-7.6(a)**.

For [type of raw material], please refer to [Annexure G-7.6\(b\)](#).

For [type of raw material], please refer to [Annexure G-7.6\(c\)](#).

For [type of raw material], please refer to [Annexure G-7.6\(d\)](#).

7. Are any of the suppliers in “G-7.4 Raw material purchases” listing related to your company? If yes, please provide details on how the price is set.
[No suppliers in “G-7.4 Raw material purchases” listing are related to GCI.](#)

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

1. Please complete the worksheet named “G-8 Upwards costs” to demonstrate that the cost listings in G-3 and G-5 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
[Please refer to Table G-8.](#)
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.
[Please refer to Annexure G-8.2.](#)
3. For any amount that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column D of the worksheet and
 - highlight or annotate the amount shown in the source document and
 - provide the account number and sub-account number (if applicable) at column E of the worksheet.

G-9 Production of the goods under consideration

1. Describe your company’s practices for capturing the production quantities reported at worksheets “G-3 domestic CTM” and “G-5 Australian CTM”. Consider using a flowchart in answering this question.
[Job sheets for production are generated through \[system\], where each job order contains a Bill of Materials \(“BOM”\). From the BOM, GCI calculates the total quantity of each material type used during the quarter. These aggregated material-usage quantities form the basis of the reported production figures for both the “G-3 domestic CTM” and “G-5 Australian CTM”.](#)
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.
[GCI maintains manual source documents to support the accuracy of production quantities. Production teams record actual production quantities manually on paper.](#)
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”.

CTM is calculated based on the job order request and represents a theoretical material requirement, which includes allowances for wastage. As the goods are manufactured using recycled raw materials, the density of the input materials varies and cannot be calculated with complete accuracy. As a result, the theoretical CTM quantities will naturally differ from the actual sales volumes recorded, leading to variances between production calculations and sales figures.

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? When a customer places an order, the required production volume is determined by calculating the weight using the formula:

[Confidential information on company's internal practices]

5. What lead times are typically needed to adjust volumes of production for the goods?
GCI's production lead time is dependent on order volume. It could stretch from [number of days].

G-10 Capacity Utilisation

1. Please complete the worksheet named "G-10 Capacity Utilisation".
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained. Please refer to **Table G-10**.
2. Explain how the production capacity and capacity utilisation has been calculated.
Production capacity is calculated based on the maximum output weight (in kilograms) that GCI's machinery can produce within a standard working day. Capacity utilisation measures how much GCI actually produced during the period compared to this maximum achievable capacity.
3. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:
GCI does not maintain dedicated warehousing facilities. All products are produced [confidential information on production and inventory].
 - (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)?
Not applicable.
4. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.
Yes. Over the past five years, GCI has implemented several upgrades to improve energy efficiency, modernise operations, and enhance process monitoring. Key changes include:

[Confidential information on company's technology improvements]
5. For each plant capable of producing inputs that could be utilised to make the goods, provide the date that production facility came into operation and the production capacity of the plant over the past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity.
In [month/year], GCI operated [number of] production lines, capable of manufacturing inputs used in the production of its goods. In [month/year], GCI expanded operations to [number of] production lines.
6. List any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.
No significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods is done by GCI.

SECTION H DOMESTIC MARKET

H-1 Prevailing conditions of competition in the domestic market

1. Describe the domestic market for the goods and the prevailing conditions of competition within the market, including:
 - (a) Provide an overall description of the domestic market which explains its main characteristics and trends over the past five years
GCI sells like product in Malaysia that has different quality compared to the product that GCI sells to Australia that is under investigation. Malaysia market is much smaller compared to Australian market.

GCI's like product used in Malaysia are not subject to any standards nor there is any enforcement on such standards. GCI have only started selling in domestic market in higher volume since [year].
 - (b) Provide the sources of demand for the goods in the domestic market, including the categories of customers, users or consumers of the product
GCI's main customer market is in [market]. It is also used mainly as concrete underlay. GCI also has customers from various sectors including [sectors].
 - (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b)
The estimated proportion (%) of sales revenue from each source of demand listed in (b) is as follows:

[Confidential information on estimated sales revenue proportion]
 - (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
For GCI's product, factors influencing consumption/demand is generally dependent on [market]. If economic activities for [market] increase, then GCI's domestic sales generally increase.
 - (e) Describe any market segmentations in the domestic market; such as geographic or product segmentations
GCI also has customers from various sectors including [sectors].
 - (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e)
The estimated proportion of sales revenue from each of the market segments listed in (e) is as follows:

[Confidential information on estimated sales revenue proportion]
 - (g) Describe the way in which domestically produced goods and imported goods compete in the domestic market
GCI's products generally face limited competition from imported goods in the domestic market due to the competitively priced nature.
 - (h) Describe the ways that the goods are marketed and distributed in the domestic market and
GCI's products are generally sold to [types of customers] in the domestic market.
 - (i) Describe any other factors that are relevant to characteristics or influences on the domestic market for the goods.

Domestic products sold generally have similar quality although they may have different colour.

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

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

GCI does not have this information on its customers.

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.

No known importers in the domestic market for the goods over the investigation period.

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

No regulatory framework of the domestic market for the goods.

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).

GCI's domestic products are [confidential information on products].

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

H-2 Goods in the domestic market

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

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

Generally, products sold by GCI in the domestic market for [purposes] are not subject to specific regulations or enforcement requirements; as such, they are manufactured according to customers' preferences.

GCI prices its goods based on quality and volume and typically produces only upon receiving orders. Customers may request private labelling for their products; otherwise, the products are supplied without any printing or labelling.

2. Describe the end uses of the goods in the domestic market from all sources.
Majority of GCI's customers are from [industry]. The goods are mainly used as [purpose]. There are also products that are being used as [purpose].
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.
Purchasing decisions or purchaser preferences in the domestic market are primarily driven by price, followed by quality and lastly by customer relationships or loyalty, in order of importance.
4. Identify if there are any commercially significant market substitutes in the domestic market for the goods.
No commercially significant market substitutes in the domestic market for the goods.
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.
Prices of goods sold has reduced sharply due to intense competition. Recent crude oil price hike has also increased cost of goods but selling price hasn't improve much, hence affecting margins.

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

1. Describe the importance of the domestic market to your company's operations. In your response describe:
 - (a) The proportion of your company's sales revenue derived from sales of the goods in the domestic market and
GCI's domestic market sales contribute roughly [percentage] of its total revenue but only a small portion is of like product under investigation.
 - (b) The proportion of your company's profit derived from sales of the goods in the domestic market.
GCI's gross profit margin on domestic sales of the goods averages between [percentages].

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.
Yes, GCI is one of the price leaders in the domestic market due to the fact that GCI has a strong network of suppliers. GCI also has its [business advantage].
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.
GCI does not have a particular price strategy applied by GCI because [nature of operations]. All sales are [confidential information on sales process].
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.
GCI does not have a particular process to determine the selling prices of the goods for the domestic market by GCI because [nature of operations]. All sales are [confidential information on sales process].

5. How frequently are your domestic selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.
Domestic prices are only reviewed when there is a major movement on raw material prices. Majority of sales is done by [salesperson], supported by [GCI's employees].
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:

[Internal information on pricing factors]
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?
GCI does not set minimum desired profit margin. GCI's [nature of operation].
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.
All prices are [confidential information on sales process]. Commissions are paid to GCI's [salesperson] based on sales, typically at [unit commission].
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.
No bundled pricing is offered 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.
Yes, if there is higher volume of sales to a customer, GCI offers slightly cheaper in price. However, there is no set rule on how volume is used to determine selling prices.
11. Does your organisation/business entity use sales contracts in the domestic market? If yes:
No sales contract is used by GCI in the domestic market.
 - (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.
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.
No price list for the goods used in the domestic market during the investigation period.

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

All GCI's sales are calculated based on cost of material used plus conversion cost and margin.

14. Do you tier or segment your domestic customers for the goods in terms of pricing? If yes, provide:
No tiering or segmentation of domestic customers for the goods in terms of pricing is done by GCI.

- (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.

Not applicable.

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

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

No selling of goods to related entities in the domestic market is done by GCI.

H-4 Marketing and sales support in the domestic market

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

GCI's products are sold mainly based on the reliability of their quality, competitive pricing, and the strong reputation the company has established. GCI is also ISO certified to ensure consistent quality in its products.

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

No brand segmentation in the domestic market for the goods is done by GCI.

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.

[Confidential information on advertisements].

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.

[Name] is GCI's [salesperson]. [Confidential information on commission paid].

There is also a small portion of customers that are handled by [GCI's employees].

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

All pricing is discussed internally [confidential information on pricing].

SECTION I AUSTRALIAN MARKET

I-1 Prevailing conditions of competition in the Australian market

1. Describe the Australian market for the goods and the prevailing conditions of competition within the market, including:
 - (a) Provide an overall description of the Australian market for the goods which explains its main characteristics and trends over the past five years
Australian sales from Malaysia have declined steadily over the past 5 years due to anti-dumping duties for Malaysian manufacturers.
 - (b) Provide the sources of demand for the goods in Australia, including the categories of customers, users or consumers of the product
GCI's customers are mainly [type of customer] for [material] in Australia.
 - (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b)
GCI's customers are mainly [type of customer] for [material] in Australia.
 - (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
For GCI's product, factors influencing consumption/demand is generally dependent on [market]. If economic activities for [market] increase, then GCI's sales generally increase.
 - (e) Describe any market segmentations in Australia; such as geographic or product segmentations
GCI sells its products across Australia.
 - (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e)
All GCI's customers are [customer category].
 - (g) Describe the way in which Australian manufactured and other imported goods compete in the Australian market
Customers have shifted from purchasing products from Malaysia to purchasing from Vietnam and other Asian countries. As far as GCI is concerned, purchasing price by Australian customers do not change much since anti-dumping duty is implemented due to the fact that customers has shifted to purchase from other countries without such duty.
 - (h) Describe the ways that the goods are marketed and distributed in the Australian market and
GCI's manufactured goods are made in Malaysia and shipped to states where its customers are located. Internal distribution is done entirely by its customer.
 - (i) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.
Products sold to Australia must adhere to Australian Standards AS 2870. All GCI's products are made according to the standards. Current anti-dumping duty has influenced the market to purchase from other countries.

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.

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:
All GCI's customers in Australia are [type of customers].

- 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.

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.

No information for the names of commercially significant importers in the Australian market for the goods over the investigation period.

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.

Under the current Australian regulatory framework, Australian products must be made according to AS2870 standards whereas Malaysia is the only country subject to anti-dumping duties.

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

Due to anti-dumping duties, no new Malaysian manufacturers export goods into Australia because new exporters will be imposed with dumping duty of 23%. Selling price of new Malaysian manufacturers is no longer competitive in Australia.

- 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.

I-2 Goods in the Australian market

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

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

Generally, products sold into Australia will fulfill Australian Standard AS2870. Products sold range from [product specification]. Prices are all calculated based on material used plus conversion fees. Some customers have their own labels and printing on goods.

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

The end uses of the goods in the Australian market from all sources are mainly be used as concrete underlay.

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. Purchasing decisions or purchaser preferences in the Australian market are primarily driven by price, followed by quality, and lastly by customer relationships or loyalty, in order of importance.
4. Identify if there are any commercially significant market substitutes in the Australian market for the goods.
No commercially significant market substitutes in the Australian market for the goods.
5. Identify if there are any commercially significant market complements in the Australian market for the goods.
No commercially significant market complements in the Australian market for the goods.
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.
No changes in market or consumer preferences in the Australian market for the goods in the last five years.

I-3 Relationship between price and cost in Australia

1. Describe the importance of the Australian market to your company's operations. In your response describe:
 - (a) The proportion of your company's sales revenue derived from sales of the goods in Australia and
Australian market used to be [percentage] of GCI's revenue but [change in percentage].
 - (b) The proportion of your company's profit derived from sales of the goods in Australia.
GCI's gross profit margin on sales of the goods in Australia averages [percentage].

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.
GCI is not the price leader in the Australian market due to anti-dumping duty imposed on its goods.
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.
GCI does not have particular price strategies in Australia because [nature of operation]. All sales are [confidential information on sales process].
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.
GCI does not have a specific process to determine the selling prices of the goods for the Australian market because [nature of operation]. All sales are [confidential information on sales process].
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.
Domestic prices are only reviewed when there is a significant fluctuation on raw material prices. Majority of Australian sales are done by [GCI's employees].

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:

[Internal information on pricing factors]

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.

GCI does not set minimum desired profit margin because GCI's operation is [nature of operation].

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.

No commission paid or price reduction are granted unnecessarily except in cases of significant fluctuations in raw material prices or exchange rates.

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.

No bundled pricing in the Australian market.

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

Yes, if the volume of sales to a customer is higher, GCI offers slightly cheaper in price. However, there is no set rule on how volume is used to determine selling prices.

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

No sales contract is used by GCI in the Australian market. All orders are based on individual Purchase Order.

- (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.

Not applicable.

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.

No price list for the goods used in the Australian market during the investigation period.

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.

All GCI's sales are calculated based on costs on material used plus conversion cost and margin.

14. Do you tier or segment your Australian customers for the goods in terms of pricing? If yes, provide:
No tiering or segmentation of Australian customers for the goods in terms of pricing is done by GCI.

- (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.

Not applicable.

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

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

No selling of goods to related entities in Australia is done by GCI.

I-4 Marketing and sales support in the Australian market

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

GCI's products are sold mainly based on the reliability of its quality, competitive pricing, and the strong reputation GCI has established. GCI is also ISO-certified to ensure consistent quality standards are maintained in its products.

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.

No brand segmentation in the Australian market for the goods is done by GCI.

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.

[Confidential information on advertisement].

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.

Australian sales are mainly handled by [GCI's employees].

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

All pricing is determined by [GCI's employees].

EXPORTER'S DECLARATION

I hereby declare that **GREAT COSMO INDUSTRIES SDN BHD** 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 : ANG SAY MENG

Signature :

Position in

Company : CHIEF OPERATING OFFICER

Date : 10 MARCH 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.