



## Corporate Restructure Assessment Form

Forms are taken to be lodged or received by the Commissioner when it is first received by a commission staff member doing duty in relation to applications.

Staff members are taken to be on duty receiving applications from 9:00am to 5:00pm (AEST or AEDST) on business days that are not an Australian Capital Territory public holiday, or during Annual Closedown\*.

See Page 9 for more details.

Applicants are encouraged to contact the Commission prior to lodgement if they wish to discuss their application or the process.

## CORPORATE RESTRUCTURE ASSESSMENT FORM

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As an exporter of goods subject to a notice under s 269TG and/or s 269TJ of the *Customs Act 1901* (the Act),<sup>1</sup> I request that the Commissioner of the Anti-Dumping Commission (the commission) assess whether the entity submitting this form, following a corporate restructure or name change, is effectively the same entity as an exporter previously examined and currently listed in the dumping commodity register (DCR) exporter table. If the commission considers that a new entity is not materially dissimilar to a previously examined exporter, I request that the applicant replace the relevant exporter in the DCR.

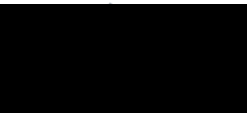
I believe that there are reasonable grounds for the applicant to replace the relevant exporter in the DCR:

- the applicant is a new entity whose corporate structure is the same as an exporter previously examined and listed in the DCR; or
  - the applicant is an exporter previously examined and listed in the DCR that has changed its registered and/or trading name; or
  - the applicant has undergone any other situation where a corporate restructure has taken place, and the applicant contends that it is the same entity as the exporter previously examined and listed in the DCR.
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### DECLARATION

I believe that the information contained in this form:

- provides reasonable grounds for determining that this entity is effectively the same entity as an exporter previously examined and currently listed in the DCR, and
- is complete and correct.

Signature: 

Name: 

Position: Assistant Section Manager

Company: CHINA STEEL AND NIPPON STEEL VIETNAM JOINT STOCK COMPANY

Date: 29 January 2026

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<sup>1</sup> All legislative references are to the *Customs Act 1901*.

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### Signature requirements

Where the form is completed:

*By a company* – the application must be signed by a director, servant, or agent acting with the authority of the body corporate.

*By a joint venture* - a director, employee, and/or agent of each joint venturer must sign the application. Where a joint venturer is not a company, the principal of that joint venturer must sign the application form.

*On behalf of a trust* - a trustee of the trust must sign the application.

*By a sole trader* - the sole trader must sign the application.

*In any other case* - contact the commission's client support section for advice.

*NB: Where the form is completed by an agent acting with authority on behalf of a company, joint venture, trust or sole trader, an authority to act letter must be provided with this application.*

### Introduction:

This form is for entities which, following a corporate restructure or name change, is effectively the same entity as an exporter previously examined and currently listed in the dumping commodity register (DCR) exporter table.

Entities applying should be an exporter of goods subject to a notice under s 269TJ and/or s 269TG of the Act and include:

1. a new entity whose corporate structure is the same as an exporter previously examined and listed in the DCR,
2. an exporter previously examined and listed in the DCR that has changed its registered and/or trading name,
3. any other situation where a corporate restructure has taken place, and the applicant contends that it is the same entity as the exporter previously examined and listed in the DCR.

The commission may allow an entity which has undergone a corporate restructure or registered/trading name change to replace a previously examined exporter on the DCR if the commission considers that new entity is not materially dissimilar to the previously examined exporter. In effect, the new entity would receive the same dumping and/or countervailing measures applying to the previous exporter because it is in essence the same exporter.

Factors that the commission may consider include (but are not limited to) changes in:

- management
- production facilities
- suppliers, and
- customer base.

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No one or several of these factors will confirm the new exporting entity is the same as the previously examined exporter. Rather, the commission will consider whether the evidence demonstrates that the new entity operates as the same business entity as the previously examined exporter. If so, the commission may assign the new entity the rate applying to its predecessor.

### Timeline

The commission will aim to process this form and provide a decision within three months from the date it is received.

In this period, the commission will:

- review your Corporate Restructure Assessment form
- publish a non-confidential summary of the information you have submitted (to ensure interested parties are afforded the opportunity to provide submissions)
- review any submissions and additional information provided by interested parties, and
- assess whether the new exporter should be assigned the same duty rate as its predecessor.

The commission may make further enquiries as part of its assessment, and it is important that you respond fully and promptly. Failure to do so may extend the timeline or cause the request to be rejected.

### **Important instructions for preparing your response**

All questions in this form 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.

Note the commission will only commence reviewing the form after the applicant has addressed every question contained in the form.

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.

### **Appendices**

Some questions require attachments to be provided. The attachment numbering sequence should refer to the question answered. For example, question 13 requests a copy of an organisation chart. To facilitate reference, the chart should be labelled Attachment 13. If a second organisation chart is provided in response to the same question, it should be labelled Attachment 13.2 (the first would be labelled Attachment 13.1).

### **Public Record**

During this assessment all interested parties are given the opportunity to defend their interests by making a submission. The commission maintains a public record of these submissions. The public record is available on the commission’s website at [www.adcommission.gov.au](http://www.adcommission.gov.au).

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### Assistance with the application:

At the time of making the application both a confidential version (for official use only) and non-confidential version (public record) of the application must be submitted. Please ensure each page of the application is clearly marked “FOR OFFICIAL USE ONLY” or “PUBLIC RECORD”. The non-confidential application should enable a reasonable understanding of the substance of the information submitted in confidence. If you cannot provide a non-confidential version, contact the commission’s client support section for advice.

The commission provides a free-of-charge document checking service, available prior to formal lodgement, to assist in ensuring that forms meet the documentary requirements. See “before you apply” at <https://www.industry.gov.au/anti-dumping-commission/apply-anti-dumping-or-countervailing-duties-measures>

The commission has also published guidelines to assist with the completion of this form. See

<https://www.industry.gov.au/anti-dumping-commission/apply-anti-dumping-or-countervailing-duties-measures>

The commission’s client support section can provide information about dumping and countervailing procedures and the information required by the form. Contact the team on:

**Phone:** 13 28 46 or +61 2 6213 6000 (outside Australia)

**Email:** [clientsupport@adcommission.gov.au](mailto:clientsupport@adcommission.gov.au)

Further information is available from the commission’s website at [www.adcommission.gov.au](http://www.adcommission.gov.au).

# REQUEST TO AMEND DCR TO REFLECT CHANGE IN COMPANY NAME

## CHINA STEEL AND NIPPON STEEL VIETNAM JOINT STOCK COMPANY

1. Identify the goods relevant to this form.

**Response:** The goods subject to measures include:

- Flat rolled products of iron and non-alloy steel;
  - alloyed steel is included for exports from India, Malaysia and Vietnam and for the following exporters from China:  
Angang Steel Co. Ltd;  
Benxi Iron and Steel (Group) International Economic and Trading Co.; and  
Yieh Phui Enterprise Co. Ltd.
- Plated or coated with zinc;
- Whether or not surface treated including combinations of surface treatments; and
- Any width.

2. Identify the name and Dumping Specification Number (DSN) of the exporter previously examined and relevant to this application. This can be accessed within the [Dumping Commodity Register](#) for the relevant goods.

**Response:** The originally investigated exporter is “China Steel Sumikin Vietnam Joint Stock Company” (CSVC). The relevant DSN applicable to CSVC’s exports is 125. See extract below.

VIETNAM							
Nam Kim Steel Joint Stock Company <i>supplied directly or through:</i> Ferrostaal Metals GmbH	CER7447733M CGA3699377L CGC6466434C						EXEMPT
Hoa Sen Group <i>supplied directly</i>	CCX4644936H CEL6476666E						EXEMPT
Hoa Sen Group <i>supplied through:</i> Hyundai Corporation Duferco SA Duferco Asia Pte Ltd Hoa Sen Holdings Group Steelaris PTE LTD Ferrostaal Metals GmbH Aspac Alliance Steels Sdn Bhd BRC Asia Limited Hanwa Singapore PTE LTD Steeforce Far East Group Limited JFE Shoji Australia Pty Ltd	CCX4644936H CEL6476666E CEP3493979E CCH3749967W CFN6939399W CFR4347946X CEF3997646C CGC6466434C CCE6446493T CCJ6433367F CGC4339749J CJA6943793P CCJ4749669A	108					Exempt Importers entering goods manufactured by Hoa Sen Group and supplied indirectly through these traders are to use this DSN. A zero duty liability will be calculated.
China Steel Sumikin Vietnam Joint Stock Company	CEP7433663L	125	IDD	Floor Price	N/A	Confidential	FOB, cash

3. Please nominate a contact person within your company:

**Response:**

Name: [REDACTED]

Position in the company: Assistant Section Manager

Telephone: [REDACTED]

E-mail address: [REDACTED]

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

**Response:**

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

*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.*

5. Please provide the location of:  
a. your company's financial records

My Xuan A2 Industrial Zone, Phu My Ward, Ho Chi Minh City, Vietnam

- b. your company's production records

My Xuan A2 Industrial Zone, Phu My Ward, Ho Chi Minh City, Vietnam

- c. your company's production plant manufacturing the goods under consideration.

My Xuan A2 Industrial Zone, Phu My Ward, Ho Chi Minh City, Vietnam

6. What is the legal name of your business? Provide evidence of the legal name (e.g. provide the company registration information).

**Response:**

CHINA STEEL AND NIPPON STEEL VIETNAM JOINT STOCK COMPANY. Please refer to **Confidential Attachment 6 - Business Registration Certificate of CSVC**.

7. Does your company trade under a different name and/or brand? If yes, provide details. Provide evidence of the trading name.

**Response:**

No.

8. Was your company ever known by a different legal and/or trading name? If yes, provide details. Provide evidence of all previous names.

**Response:**

Please see the Enterprise Registration Certificates enclosed in Attachments 8.1 and 8.2.

- **Confidential Attachment 8.1** shows our previous name "CHINA STEEL SUMIKIN VIETNAM JOINT STOCK COMPANY".

- **Confidential Attachment 8.2** shows the current name "CHINA STEEL AND NIPPON STEEL VIETNAM JOINT STOCK COMPANY" following the change from the name in Attachment 8.1.

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9. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)? If yes, provide:

(a) a diagram showing the complete ownership structure

**Response:** See all shareholders below.

Company Name	Address	Percentage
CHINA STEEL CORPORATION	1 CHUNG-KANG ROAD, SIAOGANG DISTRICT, KAOHSIUNG CITY 806, TAIWAN, R.O.C	■%
NIPPON STEEL CORPORATION	AT 2-6-1 MARUNOUCHI, 2-CHOME, CHIYODA-KU, TOKYO 100-8071, JAPAN	■%
FORMOSA HA TINH STEEL CORPORATION	VUNG ANG ECONOMIC ZONE, KY LONG WARD, KY ANH TOWN, HA TINH PROVINCE	■%
NIPPON STEEL TRADING CORPORATION	2-7-1 Nihonbashi, Chuo-ku, Tokyo 103-6025, Japan	■%
CHUN YUAN STEEL INDUSTRY CO., LTD.	FL.6,7, NO.502, FU HSING N. RD., TAIPEI, TAIWAN.	■%
HSIN KUANG STEEL CO., LTD	25F., NO. 97, SEC. 4, CHUNG SHIN ROAD, SAN CHUNG DIST., NEW TAIPEI CITY, TAIWAN	■%

(b) a list of all related companies and its functions, and

Please see **Confidential Attachment 9.1 - List of Related Companies of CSVC**.

(c) evidence of this corporate structure (E.g. corporate registry records).

Please see **Confidential Attachment 9.2 Shareholders Registry of CSVC** (last updated in 2022).

10. Is your company or parent company publicly listed? If yes, please provide:

- (a) the stock exchange where it is listed, and
- (b) any principal shareholders
- (c) evidence of a and b.

**Response:**

There are 2 parent companies:

1. CHINA STEEL CORPORATION:

Taiwan Stock Exchange (TWSE), stock code: 2002.

Evidence: Please refer to TWSC's website at below links:

- [https://www.twse.com.tw/pdf/en/2002\\_en.pdf](https://www.twse.com.tw/pdf/en/2002_en.pdf)
- <https://www.twse.com.tw/en/listed/profile/company.html>

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Rank	Shareholder Name	Ownership (%)
1	Ministry of Economic Affairs	20.00%
2	Employees' Stock Trust of China Steel Corporation under the custody of Mega International Commercial Bank Co., Ltd.	2.54%
3	Transglory Investment Corporation	1.63%
4	Chunghwa Post Co., Ltd.	1.20%
5	Labor Retirement Fund	1.13%
6	Vanguard Total International Stock Index Fund under the custody of JP Morgan Chase Bank N.A. Taipei Branch	1.02%
7	Winning Investment Corporation	1.02%
8	Vanguard Emerging Markets Stock Index Fund under the custody of JP Morgan Chase Bank N.A. Taipei Branch	0.99%
9	Labor Pension Fund	0.98%
10	Taiwan Life Insurance Co., Ltd.	0.81%

Evidence: Please refer to CSC's annual report at page 121  
([https://www.csc.com.tw/csc\\_e/ss/bd/pdf/stock114\\_03.pdf](https://www.csc.com.tw/csc_e/ss/bd/pdf/stock114_03.pdf))

## 2. NIPPON STEEL CORPORATION

Tokyo, Nagoya, Fukuoka, Sapporo Stock Exchanges

Evidence: Please refer to 会社概要 | 日本製鉄株式会社  
<https://www.nipponsteel.com/en/company/about/>

<b>NIPPON STEEL SHAREHOLDERS</b>
The Master Trust Bank of Japan, Ltd. (Trust Account)
Custody Bank of Japan, Ltd. (Trust Account)
JPMorgan Chase Bank, N.A. 385632
State Street Bank West Client
Nippon Life Insurance Company
State Street Bank and Trust Company
JPMorgan Chase Bank, N.A. 385864
JPMorgan Chase Bank, N.A. 385781
Meiji Yasuda Life Insurance Company
Nippon Steel Group Employee Stock Ownership Association

Evidence: Please refer to 資本金・株式情報 | 日本製鉄株式会社  
<https://www.nipponsteel.com/en/ir/stock/overview.html>

11. 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 to. Provide evidence of the nature of your company's business (e.g. marketing material etc.).

### Response:

CSVCS is one of the most advanced steel sheet manufacturing factories in the world, which was built in My Xuan A2 IZ, Phu My Ward, Ho Chi Minh City, Vietnam. We are actively promoting 5 main products: Pickled and Oiled Steel Coils (PO), As- Cold Rolled (Full Hard) (ASCR), Cold Rolled Steel Coils (CR), Hot-Dip Galvanized Steel Coils (CG) and Electrical Steel Coils (ES).

Please refer to our website for further details of our operations  
(<https://csvc.com.vn/products.html#prod-chart>)

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12. If your business does not perform all 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
  - (e) evidence of a-d.

**Response:** CSVC's business covers all of the above activities.

13. Provide your company's internal organisation chart.

**Response:** See **Confidential Attachment 13 - CSVC Organization Chart**.

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

**Response:** See **Confidential Attachment 14 Job Description of Organization**.

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

**Response:** See **Attachment 15 – Brochure of CSVC**.

16. When was your organisation's corporate restructure completed? Provide evidence of the corporate restructure.

**Response:** On 14 Aug 2019 our company name was changed from "China Steel Sumikin Vietnam Joint Stock Company" to "China Steel And Nippon Steel Vietnam Joint Stock Company". There was no other change to the company and no restructure in our organization.

17. Provide details on the nature of your organisation's corporate restructure. Provide details on the nature of your organisation's corporate restructure.

**Response:** The only change that has taken place is the change in the company name, from "China Steel Sumikin Vietnam Joint Stock Company" to "China Steel And Nippon Steel Vietnam Joint Stock Company". No other change to the company has occurred.

18. Prior to the restructuring, what was the relationship between your organisation and the exporter that holds the existing duty rate for the goods (the organisation previously assessed by the commission)? Provide evidence of this relationship.

**Response:** CSVC continues to be the same entity reflected in the dumping commodity register. The only difference is we have changed our company name from "China Steel Sumikin Vietnam Joint Stock Company" to "China Steel And Nippon Steel Vietnam Joint Stock Company".

19. Following the restructuring, what is the corporate relationship between your organisation and the exporter that holds the existing duty rate? Provide evidence of this relationship.

**Response:** CSVC has not undergone any restructure. We continue to be the same entity reflected in the dumping commodity register. The only difference is we have changed our company name from "China Steel Sumikin Vietnam Joint Stock Company" to "China Steel And Nippon Steel Vietnam Joint Stock Company".

20. Provide a list of your current board of directors and any changes since your organisation's corporate restructure.

**Response:** Please refer to **Confidential Attachment 20 - List of Board of Directors** for the list of current board of directors. CSVC did not restructure of its business or organization. It has only made a minor change in its company name from "China Steel Sumikin Vietnam Joint Stock

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Company” to “China Steel And Nippon Steel Vietnam Joint Stock Company”.

21. Provide details of any changes regarding which entity operates the production facilities/manufactures the goods since your organisation’s corporate restructure.

**Response:** There has been no change in our business or organization. CSVC has only made a minor change in its company name from “China Steel Sumikin Vietnam Joint Stock Company” to “China Steel And Nippon Steel Vietnam Joint Stock Company”. CSVC continues to operate all of the same production facilities before and after the company name change.

22. Does the exporter that holds the existing duty rate currently manufacture the goods? Please state if the company with an existing duty currently manufactures the goods? Please state if the company with an existing duty currently manufactures the goods but is now under/in partnership with another company, or any other similar type of agreement. Provide evidence of this relationship

**Response:** Yes, CSVC holds the existing duty rate and currently manufacture the goods, and there is no partnership with another company.

23. Provide details on whether the customer base for the goods has changed since your organisation’s corporate restructure.

**Response:** No, there has been no change in our customer base.

24. Provide details on any changes to the distribution or sale of the goods since your organisation’s corporate restructure within the following markets.

- Domestic market:
- Australian market:

**Response:** No, there has been no change to the distribution or sale of the goods.

25. Does your organisation and the exporter that holds the existing duty rate share staff or any other services or facilities?

**Response:** No, there is no sharing of staff or any other services or facilities with another company.

### **Sales evidence required**

Please provide two sample sales from the last 3 months following your organisation’s corporate restructure. The commission requires a domestic sale and an Australian sale of the goods with the following documents:

- Commercial invoices (must include names of each party in transaction, linking manufacturer to customer)
- Packing list
- Bill of lading
- Sales order/contract
- Mill certificate, and a
- Certificate of origin.

**Response:** Refer to:

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- **Confidential Attachment 25.1 - Sample Document of Domestic Sales, and**
- **Confidential Attachment 25.2 - Sample Document of Australian Sales**