



Australian Government  
Department of Industry,  
Science and Resources

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# Anti-Dumping Commission

## Exporter Questionnaire

**Case number:** 698

**Received**

Anti-Dumping Commission April 9, 2026

**Product:** Aluminium Zinc Coated Steel (AlZn)

**From:** Korea and Vietnam

**Inquiry period:** 1 January 2025 to 31 December 2025 (the period)

**Response due by:** 19 March 2026

**Email enquiries to:** [investigations@adcommission.gov.au](mailto:investigations@adcommission.gov.au)

**Anti-Dumping Commission website:** [www.adcommission.gov.au](http://www.adcommission.gov.au)

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

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## INSTRUCTIONS

### Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting an inquiry into aluminium zinc coated steel (the goods) exported to Australia from the Republic of Korea (Korea) and the Socialist Republic of Vietnam (Vietnam).

The commission will use the information you provide to determine normal values and export prices over the inquiry period. This information will determine whether aluminium zinc coated steel is dumped.

The commission will collect and use information in accordance with the commission's [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.

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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 submission. 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.

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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.
- Where there are existing formulas in the template response, these must be retained unless to do so will mean they are incorrect due to the addition of further data. If this is the case, the formulas must be corrected.
- All dates must be in excel date format, rather than a text string or other numbering system.
- All data must be in English/Romanised characters or be accompanied by an English/Romanised translation
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.

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- 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 type="checkbox"/>
Section B Export sales to Australia	<input type="checkbox"/>
Section C Exported goods & like goods	<input type="checkbox"/>
Section D Domestic sales	<input type="checkbox"/>
Section E Due allowance	<input type="checkbox"/>
Section F Third country sales	<input type="checkbox"/>
Section G Cost to make and sell	<input type="checkbox"/>
Domestic Market	<input type="checkbox"/>
Section I Australian Market	<input type="checkbox"/>
Exporter's declaration	<input type="checkbox"/>
Non-confidential version of this response	<input type="checkbox"/>

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

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G-8 Upwards costs	<input type="checkbox"/>
G-10 Capacity Utilisation	<input type="checkbox"/>

## GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

*Flat rolled iron and steel products (whether or not containing alloys), of a width equal to or greater than 600 millimetres (“mm”), plated or coated with aluminium-zinc alloys, not painted, and whether or not including resin coating.*

### Further information on the goods from ADN 2021/147

*Trade or further generic names often used to describe the subject goods include:*

- ZINCALUME® steel;
- GALVALUME® steel;
- Aluzinc, Supalume, Superlume, ZAM, GALFAN;
- Zinc aluminium coated steel;
- Aluminium zinc coated steel;
- Aluminium zinc magnesium coated steel;
- Alu-Zinc Steel sheet in Coils;
- Al/Zn; and
- Hot Dipped 55% Aluminium-Zinc Alloy coated steel sheet in coil.

*The imported goods the subject of this application covers aluminium zinc coated steel whether or not including any combination of surface treatment. For example, whether passivated (often referred to as chromated), resin coated or not resin coated (often referred to as Anti-Finger Print (“AFP”) or not AFP), oiled or not oiled, skin-passed or not skin-passed.*

*Excluded from the goods description of this application is un-passivated (often referred to as unchromated) aluminium zinc coated steel.*

*The amount of aluminium zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m<sup>2</sup>), with the prefix being AZ (Aluminium Zinc). Common coating masses used are: AZ200, AZ150, AZ100, and AZ70.*

*There are several relevant International Standards for aluminium zinc coated steel, covering the full range of products via specific grade designations, and including the recommended or guaranteed properties of each of those product grades.*

*These relevant standards are noted in the table below.*

International Standards	Product Grades
<i>General and Commercial Grades</i>	
AS/NZS 1397	G1, G2
ASTM A792	CS, type A, B and C
EN 10346	DX51D, DX52D
JIS 3321	SGLCC
<i>Forming, Pressing &amp; Drawing Grades</i>	
AS/NZS 1397	G3
ASTM A792	FS, DS
EN 10346	DX53D, DX53D
JIS 3321	SGLCD, SGLCDD
<i>Structural Grades</i>	
AS/NZS 1397	G250, G300, G350, G450, G550

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ASTM A792	33 (230), 37(255), 40 (275), 50 (340), 55 (380), 80 (550)
EN 10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3321	SGLC400, SGLC440, SGLC490, SGLC570

**Tariff classification**

The goods are generally, but not exclusively, classified to the following tariff subheadings of Schedule 3 to the *Customs Tariff Act 1995* (Cth):

Tariff Subheading	Statistical Code
7210.61.00	60, 61 and 62
7225.99.00 (Korea, Vietnam)	39

These tariff classifications and statistical codes may apply to goods which are not subject to the anti-dumping measures, may change because of amendments to the Working Tariff or the subject goods may be imported under tariff classification numbers that are not listed.

The listing of this tariff classification and statistical code is for convenience or reference only and does not form part of the goods description. Please refer to the goods description for authoritative detail regarding goods subject to the anti-dumping measures.

**Model Control Code**

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

Item	Category	Sub-Category	Identifier	Sales Data	Cost Data	Key category
1	Prime	Prime	P	Mandatory	Not applicable	Yes
		Non-Prime	N			
2	Coating Mass	≤ 100 g/m <sup>2</sup>	1	Mandatory	Mandatory	Yes
		>100 g/m <sup>2</sup> to ≤ 165 g/m <sup>2</sup>	2			
		>165 g/m <sup>2</sup>	3			
3	Steel Grade	G2 / SGLCC	A	Mandatory	Mandatory	Yes
		G3 / SGLCD	B			
		G250 / SGLC 340	C			
		G300 / G350 / SGLC 400 / SGLC 440 / SGLC 490	D			
		G450 / G500	E			
		G550 / SGLC 570	F			
Other	G					
4	Base Metal Thickness (BMT)	< 0.40 mm	1	Mandatory	Mandatory	Yes
		≥ 0.40 mm to < 0.50 mm	2			
		≥ 0.50 mm to < 0.75 mm	3			

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Item	Category	Sub-Category	Identifier	Sales Data	Cost Data	Key category
		≥ 0.75 mm to < 1.00 mm	4			
		≥ 1.00 mm to < 2.00 mm	5			
5	Width	< 600 mm	1	Mandatory	Mandatory	No
		≥ 600 mm	2			
6	Form	Coil	C	Mandatory	Optional	No
		Sheet	S			

In constructing a MCC, use a "-" between each category.

For example, according to the above MCC categories **P-2-E-3-2-C** denotes:

- prime steel
- with a coating mass greater than 100 g/m<sup>2</sup> and less than or equal to 165 g/m<sup>2</sup>
- with steel grade of G450 / G500
- base metal thickness greater than or equal to 0.50 mm and less than 0.75 mm
- width greater than or equal to 600 mm
- in coil form.

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

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

## SECTION A COMPANY INFORMATION

### A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: [REDACTED]  
Position in the company: *Part Leader / Export Support Part*  
Telephone: [REDACTED]  
E-mail address: [REDACTED]

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

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

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

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

**KG Dongbu maintains all relevant accounting records in its head office. All information presented in this EQ response is accessible from KG Dongbu's corporate headquarters in Seoul. At the same time, specific manufacturing-related records are maintained at the specific manufacturing facilities.**

**The address of the head office and the factories where the GUC is produced are as follows.**

- (1) Head Office : 5F, 92, Tongil-ro, Jung-gu, Seoul, Korea**
- (2) Dangjin Factory : 1228, Bukbusaneop-ro, Songak-eup, Dangjin-si, Chungcheongnam-do, Korea**
- (3) Incheon Factory : 789, Baekbeom-ro, Seo-gu, Incheon, Korea**

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

**See above.**

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

**See above.**

### A-2 Company information

1. What is the legal name of your business?

**The company's legal name is KG Dongbu Steel Co., Ltd (hereinafter "KG Dongbu"). KG Dongbu is a listed company in the Republic of Korea.**

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

**KG Dongbu does not trade under a different name or brand.**

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

**KG Dongbu was previously known as Dongbu Steel Co., Ltd (“Dongbu Steel”). This change of name occurred on 27 March 2020. The Commission was informed of, and fully considered, this name changes during Review 521. The Commission found that Dongbu Steel and KG Dongbu were the same corporate entity, and so the measures that applied to Dongbu Steel would continue to apply to KG Dongbu.**

**Presently, KG Dongbu does not have any other legal name or trading name.**

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

**Please refer to Attachment A(1), which lists the board of directors of KG Dongbu and any changes in the last two years.**

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

- (a) A diagram showing the complete ownership structure and
- (b) A list of all related companies and its functions

**KG Dongbu became a member of the KG Group in December 2025. Please refer to Attachment A(2), which sets out KG Dongbu’s corporate structure along with the list of the member of KG Group.**

6. Is your company or parent company publicly listed?

If yes, please provide:

- (a) The stock exchange where it is listed and
- (b) Any principle shareholders<sup>1</sup>

If no, please provide:

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

**Please refer to Attachment A(3), which lists the major shareholders of KG Dongbu and their respective holdings. KG Dongbu is a listed company in Korean stock market.**

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.

**KG Dongbu is an integrated steel manufacturer that produces a full range of steel products which are sold in Korea and to various export markets, including Australia. The biggest export market is US.**

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<sup>1</sup> 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.

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.

**KG Dongbu performs all of the above functions in relation to the goods under consideration.**

9. Provide your company's internal organisation chart.

**Please refer to Attachment A(4) for an illustration of KG Dongbu's organizational structures.**

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

**The functions of each business unit are as follows:**

- 1. [REDACTED]
- 2. [REDACTED]
- 3. [REDACTED]
- 4. [REDACTED]

**[Details of internal structure]**

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

**Please refer to Attachment A(5), which is brochure regarding the GUC manufactured by KG Dongbu.**

### **A-3 General accounting information**

1. What is your financial accounting period?

**KG Dongbu's fiscal year is the calendar year, 1 January to 31 December.**

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

**KG Dongbu accounts were audited by KPMG during the review period.**

3. What currency are your accounts kept in?

KG Dongbu's accounts are kept in KRW. KG Dongbu's system also records the original currency that was actually incurred.

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

KG Dongbu operates SAP as its enterprise resource planning ("ERP") system which fully integrates the operations of the company. KG Dongbu typically stores all sales and production/cost information in each module of ERP system.

5. What is the name of your sales system?

See KG Dongbu's response above.

6. What is the name of your production system?

See KG Dongbu's response above.

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.

This question is not applicable. KG Dongbu ERP system fully integrates the operations of the company.

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

KG Dongbu's financial accounting practices are in accordance with the generally accepted accounting principles ("GAAP") of Korea as well as Korean International Financial Reporting Standards ("K-IFRS").

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

KG Dongbu has not changed any of its accounting methods in the last two financial years.

#### A-4 Financial Documents

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

Please refer to Attachment A(6). KG Dongbu provides unconsolidated financial report for FY2024 and FY2025.

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.

See KG Dongbu's response above.

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

Not Applicable. KG Dongbu is required to have its accounts audited.

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

KG Dongbu does not maintain different profit centres.

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.

KG Dongbu provides audit report for the Year 2024 and 2025 in Attachment A(6) which covers the review period.

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

KG Dongbu provides trial balance in Attachment A(7) covering the period and the most recent financial year.

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

KG Dongbu provides the chart of accounts in Attachment A(8).

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

## SECTION B EXPORT SALES TO AUSTRALIA

### B-1 Australian export sales process

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

KG Dongbu provides the sales process diagram for export sales to Australia in Attachment B(1).

- [REDACTED] [Distribution channel]

The sales process begins with the customer contacting KG Dongbu to negotiate the sales term (i.e., price, quantity, specification, delivery terms and payment schedule). The factors that are considered by a salesperson when negotiating price include thickness, width, grade, and quality. Prices can vary depending on the exact combination of these factors. If the negotiations are successful, the parties will agree on the terms for export sales.

Once the negotiation is concluded, KG Dongbu generates an order sheet to initiate the production of the goods pursuant to the customer's requirements. KG Dongbu carries out the production of the goods, which are then shipped to the destination indicated by the customer.

KG Dongbu then issues the invoice to the customer around the time of shipment, and the customer will pay KG Dongbu in accordance with the agreed payment terms. During the investigation period, payment terms for Australian sales were mostly [REDACTED] or [REDACTED]. [Payment terms]

During the period of investigation, KG Dongbu's exports to Australia were made [REDACTED] [Shipping terms].

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

KG Dongbu invoices the customers with [REDACTED] and the customers make the payment in the designated currency as indicated on the invoice. As KG Dongbu's accounting currency is Korean Won (KRW), sales are translated from [REDACTED] to KRW using the daily exchange rate announced by the Bank of Korea on the date of sales (i.e., B/L date).

During the investigation, the customers make payment in [REDACTED], and it is recorded with the exchange rate on the payment date. The differences in exchange rate between the date of shipment and payment are recorded as gain/loss on a foreign currency transaction.

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.

**Not applicable. All Australian sales were made to unrelated customers.**

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

**Not applicable. Selling prices are determined by individual negotiation on a transaction-by-transaction basis, considering factors such as the market conditions, costs, and profit considerations.**

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. Selling prices are not determined according to distribution channel, rather prices are determined by individual negotiation on transaction specific basis.**

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.

**Not applicable. KG Dongbu did not provide any discounts, rebates, or other allowance in relation to its Australian sales.**

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.

**Not applicable. KG Dongbu did not issue any credit/debit notes in relation to the export sales to Australia during the investigation period.**

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

- (a) What date are you claiming as the date of sale?
- (b) Why does this date best reflect the material terms of sale? Any claim for an adjustment would need to substantively address:
  - whether, why, and to what degree, the considerations in determining price differed between export and domestic sales
  - whether the materials cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials

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- whether contracts were entered into for the materials purchases, and materials inventory valuation.

**In general, the GUC is produced to order, and the contracted terms such as the quantity are subject to variation between order and shipment. Consequently, the terms are not fixed until the goods are loaded onto the vessel for shipment to the Australian customers. In this regard, KG Dongbu is reporting the bill-of-lading date (that is, the date the merchandise was loaded onto the vessel for shipment from Korea) as the date of sale.**

9. Were there any factors outside of your control which affected your ability to export the goods to Australia during the review period? If yes, provide details of these factors and how they affected your patterns of trade over the review period.

**Not applicable. There were no factors outside of control that affected ability to export the GUC to Australia during the review period.**

## **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(7) 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 Attachment B(2) - Australian sales.**

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

**Please refer to Attachment B(3) - Field layout (Source) of Australian Sales.**

## **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)

The two largest samples by value have been selected and relevant documentation has been provided. The invoice number for two samples are 82713938 and 82656660. Please refer to Attachment B(4) - Australian Sales Documents #1 and Attachment B(5) - Australian Sales Documents #2.

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

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

The annotated documents reconciling the details in the "B-2 Australian Sales" are provided in Attachment B(4) and Attachment B(5).

## **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 Attachment B(6) - Upwards Sales.

2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the "B-4 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.

Please refer to additional tables inserted in Attachment B(6) - Upwards Sales and further supporting documentation provided at Attachment B(7).

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.

Please refer to Attachment B(6) and Attachment B(7).

## 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.

**KG Dongbu maintains material codes in ERP system, which were developed by KG Dongbu's engineers to identify the specifications and key physical characteristics of all products. All inventory data is kept by these material codes. Please refer to Attachment C(1), product code structure and index.**

**Please note that there is no specific code for the kind of "market" to which the product is destined. Any of the products could be sold to any market, depending on customer preference.**

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.

**KG Dongbu provides the list of MCCs of the goods exported to Australia in Attachment C(2) and below.**

MCC
P-2-D-3-2-C
P-2-D-4-2-C
P-2-D-5-2-C
P-2-F-2-2-C
P-2-F-3-2-C
P-2-F-4-2-C
P-2-F-5-2-C

### 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 KG Dongbu's responses to question C-1 above.**

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.

**KG Dongbu provides the list of MCCs of like goods sold on domestic market in**

**Attachment C(3) and shown below.**

MCC				
N-1-A-1-2-C	N-2-B-2-2-C	N-3-A-3-2-C	P-1-B-3-2-C	P-2-D-5-2-C
N-1-A-2-2-C	N-2-B-3-2-C	N-3-A-4-2-C	P-1-B-4-2-C	P-2-G-2-2-C
N-1-A-3-2-C	N-2-B-4-2-C	N-3-B-3-2-C	P-1-B-5-2-C	P-3-A-3-2-C
N-1-A-4-2-C	N-2-B-5-2-C	N-3-D-3-2-C	P-1-D-1-2-C	P-3-B-3-2-C
N-1-A-5-2-C	N-2-D-1-2-C	N-3-F-2-2-C	P-1-D-2-2-C	P-3-F-3-2-C
N-1-B-1-2-C	N-2-D-2-2-C	N-3-G-3-2-C	P-2-A-1-2-C	P-3-G-2-2-C
N-1-B-2-2-C	N-2-D-3-2-C	P-1-A-1-2-C	P-2-A-2-2-C	
N-1-F-1-2-C	N-2-D-5-2-C	P-1-A-2-2-C	P-2-A-3-2-C	
N-1-G-1-2-C	N-2-F-1-2-C	P-1-A-3-2-C	P-2-A-4-2-C	
N-1-G-2-2-C	N-2-F-2-2-C	P-1-A-4-2-C	P-2-A-5-2-C	
N-2-A-1-2-C	N-2-F-3-2-C	P-1-A-5-2-C	P-2-A-6-2-C	
N-2-A-2-2-C	N-2-G-1-2-C	P-1-A-6-2-C	P-2-B-2-2-C	
N-2-A-3-2-C	N-2-G-2-2-C	P-1-B-1-2-C	P-2-B-3-2-C	
N-2-A-4-2-C	N-2-G-3-2-C	P-1-B-1-2-S	P-2-B-4-2-C	
N-2-A-5-2-C	N-2-G-5-2-C	P-1-B-2-2-C	P-2-B-5-2-C	

**C-3 Internal product codes**

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

If yes:

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

**Please refer to Attachment C(1), product code structure and index.**

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

**KG Dongbu provides the mapping table for KG Dongbu’s product codes to MCC in Attachment C(4).**

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

**KG Dongbu provides KG Dongbu’s product codes for each MCC in Attachment C(5).**

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:
  - (a) Marketing and advertising activities
  - (b) Price determination and/or negotiation process
  - (c) Order placement process
  - (d) Order fulfilment process and lead time
  - (e) Delivery terms and process
  - (f) Invoicing process
  - (g) Payment terms and process

KG Dongbu sells the subject goods to [REDACTED] [Customer details] on the domestic market. A flow chart from initial stage of the process to delivery to the customers is provided in Attachment D(1).

Upon receiving a customer's purchase inquiry, KG Dongbu's domestic market sales personnel will negotiate sales terms, such as price and quantity, with the customer. This negotiation takes place by phone, internet, messenger or even in person.

Once the verbal negotiations are completed, [REDACTED]

[REDACTED] [Inventory details].

When the ordered goods are shipped, KG Dongbu issues a shipping invoice. The goods will either be transported to the customer, or the customer will pick up the goods, depending on the terms of the sale.

In addition, to settle the payment, KG Dongbu normally issues a tax invoice and tax invoice transaction details to its customer [REDACTED] [terms of sale].

After receiving the tax invoice, the customer will pay the bill in [REDACTED] [terms of sale].

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.

During the POR, KG Dongbu sold the GUC to two related parties. The GUC sales to related parties accounts for approximately [REDACTED]% of total domestic sales of GUC. The list of two related parties are as follows.

- [REDACTED]  
- [REDACTED]

The selling price for [REDACTED] and [REDACTED] is established through the same process applied to transaction with unrelated parties. KG Dongbu negotiate with related parties on an individual transaction basis.

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

**KG Dongbu does not keep a price list. Selling prices are determined by individual negotiation on a transaction-by-transaction basis. Important factors are the market conditions, costs, and profit considerations. As well, the relationship with the customer and volumes of both individual orders and the total business with a customer will affect negotiation positions.**

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.

**As stated above, domestic selling prices do not vary according to the distribution channel or customer category. Selling prices are determined by individual negotiation on a transaction-by-transaction basis.**

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.

**KG Dongbu does not normally provide discounts of this nature. However, during the inquiry period, KG Dongbu provided the following discounts to certain domestic customers:**

- [REDACTED] [Confidential terms of sale].

**Please refer to the response to Question E-4 below for further details.**

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.

**KG Dongbu did not issue any credit or debit notes separately. [REDACTED] [confidential terms of sale].**

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. If you are making a claim that a different date should be taken as the date of sale:

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

(b) Why does this date best reflect the material terms of sale? 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.

**The date of shipment is the same as the date of invoice and reported as the date**

of sales.

## 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 Attachment D(2) - D-2 Domestic sales.

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

Please refer to Attachment D(3). Field layout with source of Domestic sales.

## 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

Please refer to:

- Attachment D(4) - Domestic sales documents #1; and
- Attachment D(5) - Domestic sales documents #2.

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

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

Please refer to Attachment D(4) and Attachment D(5). The annotation is provided to reconcile the details in the "D-2 Domestic Sales" listing to the source documents.

## D-4 Reconciliation of sales to financial accounts

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

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in D-2 and F-2 are complete.

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- 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, 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.
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.

**Please refer to B-4 above.**

## 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:

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

All sales in the domestic market during the review period were made by KG Dongbu on [REDACTED] [details of credit terms]. Accordingly, the credit cost has been worked out using the open account calculation methodology referred to above.

A sample calculation of the reported credit expense for domestic sales can be found at Attachment D(4) and D(5).

Whereas for export sales to Australia, KG Dongbu consider that the period between payment date and the date of sales are more accurate credit period and accordingly, the credit cost has been worked out using a following formula.

$$\text{Credit Period} = \text{Date of payment} - \text{Date of Sales (i.e. B/L Date)}$$

A sample calculation of the reported credit expense can be found at Attachment B(4) and B(5).

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?

During the POR, KG Dongbu has short-term borrowings denominated in local currency. Calculation of the average short-term interest rate in local currency for the review period is included at Attachment E(1).

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?

During the POR, KG Dongbu held term deposits in local currency with an interest rate of approximately [REDACTED] %.

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



### 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?

**KG Dongbu has reported transaction-specific freight expense incurred when transporting the goods from the factory to the customer. A sample calculation worksheet has been provided at Attachment D(4) and D(5).**

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

**The delivery terms of the export sales of the goods to Australia during the review period were [REDACTED], [REDACTED] and [REDACTED].**

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?

**All export sales to Australia incurred inland freight cost and KG Dongbu have reported transaction-specific freight expense incurred when transporting the goods from the factory to the port. A sample calculation worksheet has been provided in Attachment B(4) and B(5).**

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?

**KG Dongbu has reported transaction-specific port handling expense incurred. The expenses include port handling charges, brokerage fees and bank charges incurred for each transaction.**

**A sample calculation worksheet has been provided in Attachment B(4) and B(5).**

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?

**[REDACTED] terms and transaction-specific ocean freight has been reported.**

**A sample calculation worksheet has been provided in Attachment B(4).**

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. According to the delivery term, KG Dongbu did not incur 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. KG Dongbu was not required to pay Australian import duty and delivery cost because the delivery terms did not include the requirement to incur**

those expenses.

#### 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.

KG Dongbu did not pay any commissions in relation to its domestic or Australian sales of the GUC.

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:
  - What is the rate of value-added tax (VAT) on sales of the goods and like goods?
  - How is VAT accounted for in your records in relation to sales of the goods and like goods?
  - Do you receive a VAT refund in relation to sales of the goods and/or like goods?
  - Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

KG Dongbu pays VAT when it domestically purchases or imports raw materials from overseas countries. KG Dongbu also collects VAT from its customers because it adds VAT to its domestic sales price. However, export sales are not subject to VAT. KG Dongbu records VAT paid for the purchase of raw materials on its Purchase VAT account and VAT received from its customers in domestic sales on its Sales VAT account in its accounting system, separately. Then, KG Dongbu separately accumulates purchase VAT and sales VAT and compares each other on a quarterly basis. If total sales VAT is more than total purchase VAT, KG Dongbu makes payment of the difference as VAT payable to Korea Tax Administration. In case total purchase VAT is more than total sales VAT, KG Dongbu receives the refund of the difference as VAT receivables from Korea Tax Administration. Accordingly, KG Dongbu recovers all internal taxes paid during the inquiry period.

However, it should be noted that KG Dongbu did not include VAT in the sales amount in this response.

KG Dongbu did not pay import duty for raw materials used to produce the subject goods exported to Australia.

3. Are there any other direct selling expenses incurred by your company in relation to domestic sales of like goods?
  - These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

KG Dongbu [redacted] [details of direct selling expenses].

KG Dongbu [redacted] A sample calculation of the reported [redacted] can be found at Attachment E(2).

Additionally, as explained in response to question D-1.5, KG Dongbu provided an [redacted] to customers. In this regard, the sample calculation of [redacted] has been provided in Attachment D(4) and D(5)

4. Are there any other direct selling expenses incurred by your company in relation to export sales of the goods to Australia?
  - These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

Not applicable.

## 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.
  - 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)*<sup>2</sup> for more information.

Not applicable.

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<sup>2</sup> 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.

**Not applicable. There is no distinguishing difference in the sales process between sales to Australia and to third countries.**

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.

**During the review period, KG Dongbu exported goods under consideration to third countries via the following related companies;**

- 1) [REDACTED] → [REDACTED]
- 2) [REDACTED] → [REDACTED]; and
- 3) [REDACTED] → [REDACTED].

**Please note that the price setting process is no different to that of Australian export.**

3. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:
  - (a) What date are you claiming as the date of sale?
  - (b) Why does this date best reflect the material terms of sale? Any claim for an adjustment would need to substantively address:
    - whether, why, and to what degree, the considerations in determining price differed between export and domestic sales
    - whether the materials cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials
    - whether contracts were entered into for the materials purchases, and materials inventory valuation.

**Please refer to explanation stated in B-1.8. KG Dongbu considers the date of shipment as the date of sales for all export sales.**

### 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 Attachment F(1) - Third country sales.

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

KG Dongbu provides Attachment F(2) - Field layout (source) of third country sales.

### **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.

The sales terms for third country exports varies between transactions. There are a range of differences that would affect any comparison, including product type and mix and the situation in the third country markets.

## 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.

Please refer to Attachment G(1) which outlines the production process.

The following is a brief description of each of the production lines through which the GUC pass from the hot-rolled coil stage through to packing, depending on the final product being produced:

1. Pickling and Oiling Line ("CPL")  
[Redacted]
2. Cold-Rolling Line ("CRL"); Pickle Line & Tandem CR Mill ("PL/TCM")  
[Redacted]
3. Continuous Galvanizing Line ("CGL")  
[Redacted]
4. Shearing/Slitting  
[Redacted]
5. Packing Line  
Packing is described in the response to Section E.

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.

KG Dongbu did not purchase input materials or utilities from related supplier in relation to GUC. However, KG Dongbu [Redacted]. [Details of raw material purchases]

### G-2. Cost accounting practices

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

KG Dongbu's cost accounting system is a standard cost-based system, in that the SAP structure mandates that companies develop standard costs. KG Dongbu utilizes these standard costs for budget and planning purposes and to evaluate results during the month. However, KG Dongbu calculates actual costs at month's end and adjusts the standard cost for the difference between standard and actual

costs. KG Dongbu has used the actual costs recorded in its normal cost accounting system as the basis for the reported product costs in this questionnaire.

[REDACTED] [details of cost accounting practices]

Please refer to:

- Attachment G(2), which summarise the different costs centres in respect of KG Dongbu; and
- Attachment G(3), which summarise the methodologies used to allocate the costs incurred in these centres to the direct cost centres.

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

Please see the above explanation for details of KG Dongbu's cost accounting practices.

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

Please see the above explanation for details of KG Dongbu's 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.

A list of direct, indirect, and common cost centres has been provided as Attachment G(2).

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

As explained in response to question G-1.1, KG Dongbu's cost accounting system records its production cost by [REDACTED]. [details of 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.

Production costs are valued the same for cost accounting purposes and for

financial accounting purposes.

7. Has your company engaged in any start-up operations in relation to the goods? If yes:
- Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
  - 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.

KG Dongbu has not engaged in any start-up operations in relation to the GUC.

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)?

Inventory is recorded using the monthly average inventory method and is settled by periodic inventory inspection. Valuation of inventory is made at the inventories' acquisition cost. Raw materials are valued using the moving average method. Goods in transit are valued using the identified cost method.

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

Inventories (finished goods and raw materials) are written down by the net realizable value method and the lower cost method. KG Dongbu recognizes losses, whenever the inventories are physically deteriorated or decreased, by market value. This methodology is in accordance with Korean GAAP.

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

There are two categories of scrap generated through the production process: steel scrap and zinc scrap. The value of scrap is estimated subsequently by monthly sales amount and is then deducted from the cost of goods manufactured of each product groups.

No by-products or joint products result from the production of the GUC.

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

No management or corporate allocations are charged to KG Dongbu by its related companies.

### G-3 Cost to make on domestic market

- 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 [Attachment G\(4\) - Domestic CTM](#).

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

As explained in G-6 below, KG Dongbu reports material costs, labor and manufacturing overheads using constituent ratio. For information regarding the domestic CTM source, please refer to constituent ratio provided in [Attachment G\(9\)](#)

#### **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 [Attachment G\(5\) - SG&A Listing](#).

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

Please refer to [Attachment G\(6\) - Domestic SG&A Calculation](#).

3. Complete the worksheet named "G-4.3 Upwards SG&A" to demonstrate that the SG&A listing in G-4.1 is complete by reconciling the SG&A listing to the trial balance and the audited income statement.
  - You must provide this list in electronic format using the template provided.

- Please use the formulas provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to [Attachment G\(7\)](#) – Upwards SG&A.

## 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 [Attachment G\(8\)](#) - Australian CTMS.

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".

As explained in G-6 below, KG Dongbu reports material costs, labor and manufacturing overheads using constituent ratio. For information regarding the Australian CTM source, please refer to constituent ratio provided in [Attachment G\(9\)](#)

## G-6 Cost allocation method

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

[redacted] [cost allocation methodology]

This [redacted] is provided in [Attachment G\(9\)](#). The direct raw material cost for each production code is therefore determined by applying the [redacted]. [cost allocation methodology]

This is consistent with KG Dongbu's previous verified approach in Australian anti-dumping procedures.

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.

A sample cost trace for MCC P-1-A-1-2-C is provided in Attachment G(10).

## G-7 Major raw material costs

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

Hot-rolled coil and zinc are the major input raw materials used in the manufacture of the goods.

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.

KG Dongbu used purchased raw materials, so these questions are not applicable.

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

As explained in G-6.1 above, KG Dongbu reported manufacturing cost based on [redacted] [cost allocation methodology].

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.

Please refer to Attachment G(11) - Raw Material Purchases.

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

Please refer to Attachment G(12) - Field layout with source of Raw material purchases.

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.

Sample raw material purchase invoices and proof of payments are provided in Attachment G(13).

Please refer to Attachment G(14) - Raw material purchase reconciliation.

7. Are any of the suppliers in "G-7.4 Raw material purchases" listing related to your company? If yes, please provide details on how the price is set.

This question is not applicable. KG Dongbu did not purchase raw materials from related supplier.

## 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 Attachment G(15) - Upwards Costs.

2. Please provide any documents, other than those in A-4, G-3 and G-5, required to complete the "G-8 Upwards costs" worksheet.

Please refer to Attachment G(16) - Back up documents for Upwards Costs.

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

Please refer to Attachment G(16) - Back up documents for Upwards Costs.

## 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.

As explained, KG Dongbu operates SAP as its ERP system which fully integrates the operations of the company. All cost information is stored in each module of ERP system.

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.

As explained, KG Dongbu operates SAP as its ERP system which fully integrates the operations of the company. All cost information is stored in each module of ERP system.

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

There are differences between sales and production quantities reported. There are a number of reasons for this:

- [REDACTED];
- [REDACTED] (this can be illustrated in Attachment G(15)).
- [REDACTED].

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?

KG Dongbu sets a production plan [REDACTED] days in advance, based on customers' orders. The production plan is changed according to additional orders or raw material supply and demand dynamics.

The production plan is established to allow for production to occur in the most efficient manner, considering the relevant product mix (including thickness of the product and coating weight).

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

Please refer to the above response.

## 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 Attachment G(17) - G-9 Capacity Utilisation.

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

Please refer to [Attachment G\(17\) - G-9 Capacity Utilisation](#).

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

**KG Dongbu did not use a warehouse for domestic market sales or Australian market sales. KG Dongbu has provided the inventory carrying average time for all markets between the date of final production and the date the merchandise was shipped to the customer. KG Dongbu used a standard calculation to determine the inventory turnover period by product group. The average inventory carrying period for galvanised product is ■ days. A worksheet detailing the calculation of this period is attached [Attachment G\(19\)](#).**

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.

**There have been no changes to the type of capital or technology utilised by KG Dongbu in the manufacture of the goods in the last five years.**

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.

**The Company was established in 1982, to engage in manufacturing of steel products. There have been no changes of the production capacity of the plant over the past 20 years. The capacity information is provided in [Attachment G\(19\)](#).**

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.

**KG Dongbu has not made any significant investments regarding the production of the goods in the past five years.**

## 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
  - (b) Provide the sources of demand for the goods in the domestic market, including the categories of customers, users or consumers of the product
  - (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b)
  - (d) Describe the factors that influence consumption/demand variability in 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
  - (e) Describe any market segmentations in the domestic market; such as geographic or product segmentations
  - (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e)
  - (g) Describe the way in which domestically produced goods and imported goods compete in the domestic market
  - (h) Describe the ways that the goods are marketed and distributed in the domestic market and
  - (i) Describe any other factors that are relevant to characteristics or influences on the domestic market for the goods.

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

**The Korean GUC market is primarily driven by four major mills: KG Dongbu Steel, Dongkuk CM, POSCO Steeleon and SeAH CM.**

**Over the past five years, the market has navigated significant volatility. During the early period of the past five years, the global steel market experienced a pronounced surge in both demand and pricing. This was primarily driven by the rapid economic recovery following the pandemic and the onset of the Russia-Ukraine conflict. However, as the market began to stabilize, the sector shifted into a downward trend.**

**As the domestic market is normally based on the long-term relationships with customers, and each participant in the market focuses on retaining existing customers rather than exploring new channels, GUC market have experienced a relatively narrower margin of decline (i.e., market fluctuations are very minimal). Therefore, maintaining the stable demand over the recent years.**

**KG Dongbu approaches the domestic market based on products and/or customer industry segments (i.e., source of demand). The key industries which consumed the GUC are home appliances industry, construction and substrate for pre-coated steel, consists of revenue proportion to approx. █%, █% and █% respectively based on sales made by KG Steel during the investigation period.**

**As a result, demand of the goods depends on the market dynamics of the above-mentioned industries. For instance, government policies play a major role in construction sectors and when its stance is favourable to the construction market, the demand in GUC relatively in the upwards trend. Also, seasonal fluctuations of the construction industry have impact on the market causing relatively lower**

demand in winter season. In contrast to the construction sector, GL demand for home appliances exhibits a high degree of stability. Item such as refrigerators are essential year-round appliances. Therefore, demand from major domestic manufacturers like Samsung and LG Electronics remains steady regardless of seasonal changes, providing a reliable baseline for GUC consumption in the domestic market.

In 2025, approximately [REDACTED] tons of GUC were imported into Korea market. The vast majority of these imports originated from China, which continues to be the dominant foreign supplier. However, as the trade remedies are expected take place in 2026, the demand is expected to shift back to local suppliers. Consequently, the sales volume of domestically produced GUC is projected to expand.

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.

Please refer to Attachment H(1) which describes the domestic market structure for the goods.

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.

Please refer to Attachment H(1) which states the key participants in the domestic market for the goods at each level of trade. To the best of sales personnel's knowledge, the market share of GUC used for construction materials is estimated as follows; KG Dongbu Steel ([REDACTED]%), Dongkuk ([REDACTED]%), POSCO Steeleon ([REDACTED]%) and Import from China ([REDACTED]%)

There is no integration between these market participants.

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.

KG Dongbu does not have information regarding the identities of commercially significant importers in the domestic market for the goods. However, the major import country is China.

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.

We are uncertain about the purpose of this question in the context of this continuation inquiry. We assume the Commission would not be expecting a discussion about Korean competition policy or taxation in general but, rather, is

querying the degree to which there are specific provisions relating to the GUC (noting KG Dongbu's response to question E-4 explains the VAT system). In which case there are no mandatory regulatory frameworks that relate specifically to the domestic market for the goods. Most Korean manufacturers seek to comply with the Korean Standards (KS) for its product (or other equivalent) as the market recognize the goods with the certification reliable.

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

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

**There is no specific restriction on new participants joining the domestic market for the goods.**

**However, to enter the domestic market, new participants are recommended to acquire KS or other equivalent standards mainly to prevent the low standard product from import and maintaining the standard quality within the market. Also, some consumers operate their own quality approval procedures which may act as a barrier to a new entry.**

## 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.

**GUC is mainly categorised by application purpose, coating thickness and end post-treatment. As GUC has been established in the market for a considerable period, there are no significant differences in quality among products manufactured in Korea.**

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

**As mentioned above, the goods in the domestic market are mainly used for construction materials, home appliances and substrate for pre-coated steel.**

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.

As we have noted above, the domestic market tends to be characterised by long-term relationships between supplier and customer. These long-term relationships build efficiencies in term of ordering, communication etc, which has the benefit of reducing transaction costs. This is a key driver of purchasing decisions.

In addition to this, price is also considerations. Assuming a customer is after the same size and quality of goods, price becomes the primary factor influencing purchasing decisions in the domestic market. Of course, if the customer was looking for a product with superior weldability, then they would be less susceptible to price.

Finally, the delivery schedule would be an important determinant. A customer would likely be willing to pay more for a product that is available to them when they need it.

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

Not applicable.

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.

There have been no notable changes in market preferences in the domestic market for the goods in the last five years.

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

*In responding to question 1 please provide evidence supporting calculations.*

During the investigation period ■% of KG Dongbu's revenue (including all products sold) was derived from the domestic market.

Sales of the GUC to all markets accounted for ■% of the company's total revenue. ■% of GUC sales occurred in the domestic market.

Please note, these figures have been drawn from Attachment B(6).

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.

KG Dongbu does not act as the sole price leader for the GUC. Instead, the price leadership in domestic market is segmented by the end-user industry.

**(1) Home Appliance Industry**

**: The price of GUC is heavily influenced by broader galvanized steel market, particularly galvanized steel (GI). The price negotiations between POSCO and major end-users such as Samsung and LG regarding GI products set the fundamental tone for the industry.**

**(2) Construction Industry**

**: In the construction industry, KG Dongbu Steel and Dongkuk CM are the primary entities that lead market price trends.**

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.

**As stated above KG Dongbu is mostly a price taker in the domestic market**

**The company's price strategy is primarily based on cost-plus pricing. For each month, the company establish the company-wide target margin and business unit target margin, then forecast cost to make for the month and add other selling costs, set the target margin, and calculate the target selling price. After the target price is set, the competitors' price in the market is considered. Sales staff can use their insight into the market to adjust the selling price based on their appreciation of the circumstances of the negotiation, but these adjustments are done without compromising the set target margin.**

**Please refer to Attachment H(2), used by sales personnel for pricing guidelines.**

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.

**Please refer to the above response. The process for determining domestic selling prices typically begins by establishing general sales targets. Then, an analysis of projected costs is conducted to calculate the target price to meet those the sales target. Price negotiations are conducted with the customer based on the target selling price.**

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 generally reviewed monthly. Once the team identifies changes in the market which justify an adaption of price strategy, the sales team can adjust its selling price based on their discretion with approval from business unit's executive directors. The factors leading price review include price strategy of competitors, supply and demand imbalance and cost to make.**

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

**The order of importance of factors influencing pricing is as follows;**

- 1) Purchase price of raw materials;**
- 2) Cost to make and sell the goods;**
- 3) Desired profit;**
- 4) Competitor's prices;**
- 5) Customer relationship management;**
- 6) Volume of the order;**
- 7) Value of the order;**
- 8) Other above mentioned 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?

**Please refer to the response above. The KG Dongbu initially sets the selling price based on the costs to make and sell and desired profit margin.**

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.

**KG Dongbu generally does not provide price reductions in the domestic market. However, there is one types of discounts available to the customers during the POR. Domestic customers are eligible for the discounts if they [REDACTED]. Please refer to Section E-4.**

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.

Not applicable.

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

**KG Dongbu's price is not based on the size of an order. However, sales staffs may consider such factor when finalizing the selling price for each transaction.**

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

**Generally, domestic customers enter a sales contract in their very first transaction with KG Dongbu, mainly setting the collateral. Then in the subsequent sales, no further contract is required if sales are made within the collateral limit. These contracts are reviewed if major terms and conditions are changed. However, the details of sales terms are determined by individual negotiation on a transaction-by-transaction basis at the time of sales including price.**

**KG Dongbu does not offer exclusive contracts.**

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.

**KG Dongbu does not keep a price list. Selling prices are determined by individual negotiation on a transaction-by-transaction basis. Important factors are the market conditions, costs, and profit considerations.**

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.

**The GUC consists of various product code which pricing primarily differs based on technical specifications such as thickness and coating weight.**

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

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

**Not applicable. The price differs by combination of product characteristics and individual negotiation.**

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.

**During the POR, KG Dongbu sold the GUC to two related parties. The GUC sales to related parties accounts for approximately █% of total domestic sales of GUC. The list of three related parties are as follows.**

- █  
- █

**The selling price for █ and █ is established through the same process applied to transaction with unrelated parties. KG Dongbu negotiate with related parties on an individual transaction basis.**

#### 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.).

**As stated above, sales in the domestic market are largely based on the long-term relationships with customers. Hence, the company focus on retaining existing customers by increasing the customer loyalty. This is achieved by regular face-to-face meeting with the customers for timely communication, inviting keyman from the customers and providing quick solutions to any inconvenient raised by customers.**

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.

**Not applicable.**

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

**KG Dongbu does not advertise the goods in the domestic market. KG Dongbu generally promotes the company itself rather than the individual product line. For example, KG Dongbu may provide sponsorship and creating promotion materials for media including YouTube or newspaper. KG Dongbu also operate the company**

website readily available for public.

The only product specific promotion conducted by the KG Dongbu is producing product brochures which has been provided as Attachment A(5).

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.

The domestic market sales team for the GUC consists of ■ sales staff (■ at the head office and ■ at individual branches). Sales staff are remunerated with an annual salary. Bonuses are not tied to sales but are provided based on the annual operating profit performance of the company.

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.

Please refer to Attachment H(2). Sales staff are provided with the monthly target margin and estimated cost to make and sell information to assist in establishing pricing for the goods.

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

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

**The Australian market for GUC is characterized by its high concentration in the construction industry and substrate for pre-coated steel. Due to Australia's vast coastline and environment conditions, GUC is widely preferred over galvanized steel for its superior corrosion resistance and durability, provided by its aluminium-zinc alloy coating.**

**The Australian market for the goods is dominated by its domestic producer, Bluescope. The balance of market share is represented by imports from multiple sources, which, according to the Commission's Trade Remedy Index ("TRINDEX"), include Indonesia, China, Taiwan and Vietnam, in addition to Korea.**

**As the market leader, the domestic producer prioritizes the internal consumption of a significant volume of the GUC as the primary substrate for its pre-painted steel production. Consequently, it is estimated that the domestic producer does not fully satisfy the total market demand for GUC required by the construction industry. This supply-demand gap necessitates a consistent requirement for imported GUC to support the construction sector. In this context, GUC from Korea has established a strong reputation for its high performance and superior quality. Primarily serving to bridge this supply deficit.**

**Over the past five years, demand for GUC has been linked to fluctuations in the Australian construction industry. Between 2020 and 2022, the market experienced a sharp surge in demand, driven by government stimulus and housing construction programs initiated during the pandemic. This period was marked by record-high prices resulting from severe supply chain constraints coupled with peak consumption levels. More recently, however, the market has entered period of stabilisation; rising interest rates and increased construction costs has slowed residential building activity, bringing prices back toward pre-pandemic levels. Despite these cyclical shifts, the demand for GUC remains consistently resilient in**

the Australian construction sector due to its high-quality corrosion resistance.

Consumption and demand variability in Australia are influenced by the construction industry's business cycle and consumption trends. Typically peaking during the spring and summer months while slowing down during the year-end holiday period. Beyond seasonality, consumptions influenced by macroeconomic factors such as interest rates, inflation, and raw material costs.

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.

Please refer to Attachment I(1) which describes the Australian market structure for the goods.

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

As mentioned above, the most significant participant influencing the Australian market is the domestic producer. BlueScope has dominant market share in the Australian market for the GUC. In this context, they should wield pricing power, and their pricing decisions effect every other market participant. To the best of our knowledge, BlueScope sells GUC through a network of various coil centres such as BlueScope Distribution, Coil Steels.

The major importer from Korea is KG Dongbu Steel and Dongkuk CM. Imported GUC from Korea generally imported through trading company or distributor in Australia. Then, these traders and distributors resell the GUC to local roll-formers and other end-users.

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.

Due to the proprietary nature of commercial transactions, precise market shares of individual importers are not publicly available. However, KG Dogbu understands that major importer form Vietnam is Namkim Steel, Hoasen and Hoaphat.

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.

As imports are mainly consumed in the construction industry, the steel products used within this sector must comply with the Australian Standards (AS) and National Construction Code (NCC) which set out the minimum requirements for

relevant safety and sustainability.

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

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

In addition to above mentioned regulatory restrictions, there are trade measures such as anti-dumping placed on Korea, Vietnam and China.

## 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.

GUC is mainly categorised by application purpose, coating thickness and end post-treatment. As GUC has been established in the market for a considerable period, there are no significant differences in quality among products manufactured by different manufacturer.

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

As stated above, the typical application of the goods is at the construction industry (e.g. roofing, wall cladding, steel frame and etc.)

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.

A key factor influencing purchasing decisions is the maker of the goods and their history with the client. The Australian market value business reliability, often proven through past transactions. Given the geographic location of the market, the ability to guarantee a consistent supply chain and timely delivery provides a competitive advantage.

The goods from certain producer can be more suitable to customers' uses or its production due to very minor mechanical properties. Two different manufacturers producers could produce the same kind of product, with similar production

processes, but one may result in a higher defective rate compared to other. A customer will prefer the latter over the former. Therefore, product quality and durability are critical factors. Finally, price competitiveness also a key purchasing influencer.

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

Not applicable.

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

Not applicable.

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.

Not applicable. Over the past five years, there have been no significant changes in market or consumer preferences for the goods in the Australian Market.

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

*In responding to question 1 please provide evidence supporting calculations.*

During the investigation period, the Australian sales of GUC account for about █% out of KG Dongbu's total company's revenue (including all products sold). This has been calculated based on Attachment B(6).

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.

KG Dongbu's share of the Australian market is not substantial enough to impact the market price, so KG Dongbu has no pricing power.

The Australian market price is driven by the domestic producer who holds the majority market shares (i.e. BlueScope)

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.

**As stated above KG Dongbu is price taker in the Australian market.**

**KG Dongbu's pricing strategy in Australia is primarily based on cost-plus pricing, which adjusted based-on the competitor's prices. Please refer to Attachment H(2) for a sample of the monthly target selling price guideline, which is intended to achieve optimal cost-plus pricing. Once the baseline price is established, the final price is determined by taking into account the market prices of BlueScope and other importers' price.**

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.

**Please refer to KG Dongbu's response to question H-3. The pricing process is the same as that described in the domestic market.**

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.

**General price guidelines are reviewed monthly, while selling prices for individual transactions are determined at the time of sales, to reflect the most recent market dynamics. Price guidelines are prepared by the marketing team whereas final prices are set by sales team.**

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

**The order of importance of factors influencing pricing is as follows;**

**1) Purchase price of raw materials**

**2) Cost to make and sell the goods**

**3) Desired profit**

**4) Competitors' prices**

**5) Customer relationship management**

6) Volume of the order

7) Others – New business opportunity

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.

**Please refer to the above response. KG Dongbu's selling price is based on its desired profit margin. Attachment H(2) shows that KG Dongbu closely monitors the relationship between selling price and costs to make and sell.**

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.

**Not applicable. KG Dongbu does not provide price reductions in the Australian market.**

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.

**Not applicable.**

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

**There is no specified price policy that requires price adjustments based on the size of an order. As explained in Section B, KG Dongbu negotiates prices on transaction-by-transaction basis. When negotiating the price, the sales staff may consider the order size and offer competitive price to the customers.**

11. Does your organisation/business entity use sales contracts in the Australian market? If yes:
- What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
  - Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
  - How frequently are sales contracts renegotiated?
  - How frequently are price reviews conducted between contracts?
  - 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.
  - 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.

**KG Dongbu enters contracts on a transaction basis - one contracts may consists of multiple delivery/invoices. Contracts are not renegotiated but, rather, when there are new orders raised from the customer, the parties enter a new contract. At the time of contract, all sales terms are negotiated. KG Dongbu does not offer exclusive contracts.**

**Please refer to Attachment B(4) and B(5) for two sample sales contracts.**

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.

**KG Dongbu does not keep a price list. Selling prices are determined by individual negotiation on a transaction-by-transaction basis. Important factors include market conditions at the time of sale, costs, and profit considerations.**

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.

**The GUC consists of various product code which pricing primarily differs based on technical specifications such as thickness, width and coating weight.**

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

**Not applicable. The price differs by combination of product characteristics and not by market segment.**

*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.

**Not applicable. During the investigation period, KG Dongbu did not sell the GUC to related entities in the Australian market.**

#### **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.).

Sales of the goods to the Australian market account for less than █% of total GUC sold by KG Dongbu. KG Dongbu does not have any active marketing strategy in relation to the goods exported to the Australian market. Nonetheless, the main aspect of the goods highlighted by KG Dongbu are quality, price of the goods and delivery on time.

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.

Not applicable.

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

As stated in Section H-4. KG Dongbu does not advertise specific goods to the market. The company promotes the company itself. In addition, sales to Australian market are generally made through distributors. Hence, KG Dongbu does not need to conduct any promotional campaigns to the final customers in the Australian market.

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.

KG Dongbu does not have a specific team responsible for the Australian market. KG Dongbu has █ overseas teams that are internally divided by regions. There is one sales staff in charge of Oceania, America region. As mentioned in Section H, sales teams are remunerated based on the annual salary basis.

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.

Please refer to above. Sales staff are provided with monthly target margins for export sales in general and estimated cost to make and sell information to assist in establishing pricing for the goods.

## EXPORTER'S DECLARATION

I hereby declare that **KG DONGBU STEEL CO. LTD** have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

A handwritten signature in black ink, consisting of several loops and strokes, positioned above a black rectangular redaction box.

**KG Dongbu Steel Co., Ltd.**  
**Marketing Support Team / Staff**

**Date: 27 April 2026**