Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 706

Product: Zinc coated (galvanised) steel

From: The Republic of Korea by Dongkuk Coated Metal Co. Ltd, Dongkuk Steel Mill Co Ltd and POSCO, and from the Socialist Republic of Vietnam by Hoa Sen Group and Nam Kim Steel Joint Stock Company

Investigation period: 1 January 2025 to 31 December 2025 (the period)

Response due by: 27 July 2026

Email enquiries to: investigations2@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

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

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting an investigation into zinc coated (galvanised) steel exported to Australia from the Republic of Korea (Korea) by Dongkuk Coated Metal Co. Ltd (DCM), Dongkuk Steel Mill Co Ltd (DSM) and Posco Holdings Inc (POSCO), and from the Socialist Republic of Vietnam (Vietnam) by Hoa Sen Group Joint Stock Company (Hoa Sen) and Nam Kim Steel Joint Stock Company (Nam Kim).

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

The commission will collect and use information in accordance with its Collection and Use of Information Policy.

If you do not manufacture the goods

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

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

What happens if you do not respond to this questionnaire?

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

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

Extension requests

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

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

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

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

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

Submitting a response to the exporter questionnaire

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

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

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

Confidential and non-confidential responses

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

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

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

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

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

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

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

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

Verification of the information that you supply

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

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

The verification may include commission staff visiting your company to conduct an onsite verification. Any onsite verification typically commences approximately 2 to 4 weeks after the due date of the response to the exporter questionnaire. To assist with the planning of a verification, please contact the commission as soon as possible for a potential verification date to be scheduled.

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

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

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

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

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

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

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.

- All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.

- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.

- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)

- The data must be created as spreadsheet files in Microsoft Excel.

- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.

- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the commission's verification of your data.

- If you cannot present electronic data in the requested format contact the commission as soon as possible.

- Where possible, electronic data should be shared with the commission via SIGBOX, a secure online document repository. Please contact the commission to request access to SIGBOX if required.

CHECKLIST

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

Section	Please tick if you have responded to all questions
Section A Company information	☒
Section B Export sales to Australia	☒
Section C Exported goods & like goods	☒
Section D Domestic sales	☒
Section E Due allowance	☒
Section F Third country sales	☒
Section G Cost to make and sell	☒
Exporter's declaration	☒
Non-confidential version of this response	☒

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	☒
B-2.2 Australian sales source	☒
B-4 Upwards sales	☒
D-2 Domestic sales	☒
D-2.2 Domestic sales source	☒
F-2 Third country sales	☒
F-2.2 Third country sale source	☒
G-3 Domestic CTM	☒
G-3.2 Domestic CTM source	☒
G-4.1 SG&A listing	☒
G-4.2 Domestic SG&A calculation	☒
G-4.3 Upwards SG&A	☒
G-5 Australian CTM	☒
G-5.2 Australian CTM source	☒
G-7.2 Raw material CTM	☐
G-7.4 Raw material purchases	☒
G-8 Upwards costs	☒
G-10 Capacity Utilisation	☒

GOODS UNDER CONSIDERATION

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

Flat rolled products of iron or steel, whether or not containing alloys, of a thickness of 0.3 millimetres up to and including 3.5 millimetres, of any width, in coil or sheet form, plated or coated with zinc.

The goods under consideration are flat rolled steel products that are plated or coated with zinc, where zinc comprises equal to or greater than 50 percent of the total coating composition. The remaining coating composition can comprise any other alloy elements.

The goods under consideration do not include flat rolled steel products plated or coated with zinc that are painted, pre-painted, electro-galvanised, corrugated, or coated with aluminium-zinc alloys where aluminium is equal to or greater than 50 percent of the total coating composition.

<u>Further information in relation to the goods</u>:

The goods the subject of the application have been exported to Australia by Korean and Vietnamese producers currently not subject to Australian trade remedy measures on flat rolled products of iron or steel, plated or coated with zinc.

These goods are generically called ‘galvanised steel’ and/or ‘zinc coated steel’. Galvanised steel of any width is included in this application.

Steel products plated or coated with zinc include all coatings that have zinc as the dominant component of the coating. Expressed another way, all coatings that have zinc comprising greater than 50 percent of the total coating composition are included as the goods in this application.

Surface treatments can include, but are not limited to, the following: passivated or not passivated (often referred to as chromated or unchromated); oiled or not oiled; skin passed or not skin passed; phosphated or not phosphated (for zinc iron alloy coated steel only).

The goods covered by this inquiry also includes all zinc coated steel product that have been further processed in a third country, including but not limited to trimming, cutting, slitting, shearing or any other processing that would not otherwise remove the zinc coated steel product from this inquiry if performed in the country of manufacture of the included zinc coated steel goods.

By way of example, trade or brand names commonly associated with imported zinc coated steel products include, but are not limited to:

- SuperDyma;
- ZAM;
- GALFAN;
- PhuizerZinc and PhuizerFan;
- GIX;
- MgCOT;
- Magnelis;
- PosMAC;
- Magizinc; and
- Galvanneal

Model Control Code

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

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
1	Base Metal Thickness (BMT)	=> 0.30 mm to < 0.50 mm	1	Mandatory	Mandatory
		=> 0.50 mm to < 0.75 mm	2		
		=> 0.75 mm to < 1.00 mm	3		
		=> 1.00 mm to < 1.50 mm	4		
		=> 1.50 mm to < 2.00 mm	5		
		=> 2.00 mm to < 2.50 mm	6		
		=> 2.50 mm to <= 3.50 mm	7		
2	Steel Base	Hot Rolled	H	Mandatory	Mandatory
		Cold Rolled	C		
3	Coating Type	Zinc coated or non-zinc/iron alloy coating variations (Z, ZA, ZM etc. coating classes)	Z	Mandatory	Mandatory
		Zinc/iron alloy coating (ZF coating class)	F		
4	Prime	Prime	P	Mandatory	Mandatory
		Non – Prime	N		
5	Yield Strength - Minimum yield strength specified by product standard (Mega Pascals or "MPa")	<= 275 MPa	Y1	Mandatory	Mandatory
		> 275 to <= 375 MPa	Y2		
		> 375 to <= 525 MPa	Y3		
		> 525 MPa	Y4		
		NA - minimum yield strength not specified in product standard	Y5		
6	Coating Mass	<= 100 g/m2	1	Mandatory	Mandatory
		>100 g/m2 to <= 220 g/m2	2		
		> 220 g/m2 to <= 300g/m2	3		
		> 300 g/m2 to <= 400 g/m2	4		
		>400 g/m2	5		
7	Width	< 600 mm	A	Mandatory	Mandatory
		=> 600 mm to <= 1220mm	B		
		> 1220mm	C		
8	Form	Coil	C	Mandatory	Mandatory
		Sheet	S		

In constructing a MCC, use a "-" between each category. For example: 1-H-Z-P-Y1-1-A-C

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:
   Position in the company:
   Telephone:
   E-mail address:

Name:	**Hwanok KIM**
Position in the Company:	**Senior Manager of the Trade Affairs Team**
Telephone:	**+82-10-9901-8068**
E-mail address:	**hwanok.kim@dongkuk.com**

2. If you have appointed a representative, provide their contact details:
   Name:
   Address:
   Telephone:
   E-mail address:

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.

Name:	
Address:	
Telephone:	
E-mail address:	

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

The respondent to this questionnaire, Dongkuk Coated Metal Co., Ltd. (hereinafter "DCM", "Dongkuk CM", or "the Company"), is headquartered in

Seoul, Korea. The full address of its head office is Ferrum Tower, 19 Eulji-ro 5-gil, Jung-gu, Seoul, Korea.

The Company's financial management and accounting, planning, and other executive management functions are located at the Seoul headquarters, along with its export and domestic sales teams.

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

The Company's production records are accessible from its headquarters in Seoul, as well as from its factories in Korea.

The Company has provided a full list of Dongkuk CM's offices and factories in Korea in Exhibit A-1.4.

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

During the period of investigation ("POI"), the Company produced the goods under consideration ("GUC") at its Busan factory, located at 102 Sinseon-ro, Nam-gu, Busan, Korea.

A-2 Company information

1. What is the legal name of your business?

The legal name is Dongkuk Coated Metal Co., Ltd.

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

No. The Company does not trade under any different name or brand.

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

Until 2014, Union Steel Co., Ltd. was a producer of cold-rolled steel products, including a product falling within the GUC, and conducted business under the name "Union Steel." Effective January 1, 2015, Dongkuk Steel merged with Union Steel Co., Ltd. As a result of the merger, Union Steel's operations were integrated into Dongkuk Steel's operations, and the name "Union Steel" ceased to be used thereafter.

The Company was newly established through a spin-off from Dongkuk Steel Mill Co., Ltd. (which subsequently changed its name to Dongkuk Holdings Co., Ltd.) on June 1, 2023, the effective date of the spin-off.

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

The Company provides the list of its board of directors in the last two years in Exhibit A-2.4.

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

The Company is a subsidiary of Dongkuk Holdings. The Company is also a member of the Dongkuk Steel Group, which is not a separate legal entity but rather a group of manufacturing and transportation companies with certain common ownership interests.

The Company provides the following information to assist the Commission in understanding the Dongkuk Steel Group:

Exhibit A-2.5(1) - List of Affiliated Companies

Exhibit A-2.5(2) - Cross-Ownership Chart

6. Is your company or parent company publicly listed?
   If yes, please provide:
   (c) The stock exchange where it is listed and
   (d) Any principal shareholders[1]
   If no, please provide:
   (a) A list of all principal shareholders and the shareholding percentages.

The Company was newly established through a spin-off from Dongkuk Steel Mill Co., Ltd. (which subsequently changed its name to Dongkuk Holdings Co., Ltd.) on June 1, 2023, the effective date of the spin-off. The Company was listed on the KOSPI market of the Korea Exchange on June 16, 2023.

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

Dongkuk Holdings, the parent company, is a publicly traded company whose shares have been listed on the Korea Exchange since April 1988.

Lists of the principal shareholders of Dongkuk CM and Dongkuk Holdings, together with their respective shareholding percentages, are provided in Exhibits A-2.6(1) and A-2.6(2), respectively.

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.

The Company produces and sells a diverse range of cold-rolled steel products. These products are sold in both the domestic market and export markets, including Australia.

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.

The Company performs all of the functions listed above.

9. Provide your company's internal organisation chart.

The Company's internal organizational chart is provided in Exhibit A-2.9, with the teams directly involved in the sales and production of the GUC highlighted.

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

The Company's operations are organized into various functional departments under the CEO, including the Strategy Department, Management Department, Procurement Department, Sales Department, Busan Works, and the R&D Centre.

Exhibit A-2.9 provides a detailed organizational chart and descriptions of the functions of each department. Teams directly related to the GUC have been highlighted for ease of reference.

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

The Company provides its company brochure in Exhibit A-2.11(1) and its product catalogue covering the GUC in Exhibit A-2.11(2).

A-3 General accounting information

1. What is your financial accounting period?

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

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

Yes. Dongkuk CM's financial statements are audited by Deloitte Anjin LLC, an independent external auditor.

3. What currency are your accounts kept in?

The Company's accounts are kept in Korean won.

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

The Company utilises the SAP ERP system as its financial accounting system. The SAP Financial Accounting ("FI") module performs the Company's financial accounting functions and generates various accounting reports.

Exhibit A-3.4 provides a conceptual flowchart of the Company's financial accounting and record-keeping system.

5. What is the name of your sales system?

The Company uses the SAP Sales and Distribution ("SD") module as its sales system. The SAP SD module includes an Order Management System ("OMS").

6. What is the name of your production system?

The Company uses the SAP Production Planning ("PP") module as its production system. The SAP PP module manages production operations and includes a Manufacturing Execution System ("MES").

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. As explained above, the Company's production, sales, and financial accounting systems are not separate systems, but integrated modules within the SAP ERP system.

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

No. The Company's financial accounting practices comply with the Korean International Financial Reporting Standards ("K-IFRS") applicable to publicly listed companies in Korea. A description of the Company's normal accounting practices is set out in the notes to its financial statements.

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

No. There have been no changes to the Company's accounting practices or policies over the last two years, other than general updates to K-IFRS. Any such updates are described in Note 2 to Dongkuk CM's financial statements.

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.

The two most recent financial statements are provided in Exhibit A-4.1 as follows:

A-4.1.(1)	**Dongkuk CM 2024-2025 Separate Audited F/S**
A-4.1.(2)	**Dongkuk CM 2024-2025 Consolidated Audited F/S**
A-4.1.(3)	**Intergis 2024-2025 Separate Audited F/S**
A-4.1.(4)	**Dongkuk Corporation 2024-2025 F/S**
A-4.1.(5)	**Aju Steel 2024-2025 Separate Audited F/S**

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

The audit management letters are attached to the audited financial statements.

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.

All financial statements included in Exhibit A-4.1, except those of Dongkuk Corporation ("DKC"), have been audited. DKC's tax returns for the corresponding period and the reconciliation worksheet between its financial statements and tax returns are provided in Exhibits A-4.3(a) and A-4.3(b), respectively.

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.

The Company maintains internal financial records by business area. The GUC falls within the "Busan Factory" business area.

Accordingly, the internal income statements for the Busan Factory business area for (a) the most recent financial year and (b) the period are provided in Exhibit A-4.4. In this case, the period is fiscal year 2025, which is the same as the most recent financial year.

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

The period is fiscal year 2025, which is the same as the most recent financial year. For the reference, the Company also provides "Income Statements for FY2025" as Exhibit A-4.5.

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

The Company provides its trial balance, in Excel format, for the period and the most recent financial year in Exhibit A-4.6. In this case, the period is fiscal year 2025, which is the same as the most recent financial year.

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

The Company provides its chart of accounts (in Excel) in Exhibit A-4.7.

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

During the period, the Company's Australian sales of the GUC can be broadly categorised into two channels based on customer location.

The first channel consists of direct sales to customers located in Australia ("direct export sales"). In these transactions, Australian customers place purchase orders following negotiations with the Company's export sales team. Once an order is finalised, it is entered into the Company's sales management system. The export sales team then prepares an internal production request, which is incorporated into the production schedule at the Busan factory. Upon completion of production, the Company arranges shipment of the goods to the specified destination in accordance with the agreed delivery term, which during the period was made on FOB (Free On Board). A commercial invoice is then issued to the Australian customer, and payment is secured by letter of credit.

The second channel involves the Company exporting the GUC to Australia through sales to a trading company based in Korea ("local trader export") with delivery terms of EXW (Ex Works), or FAS (Free Alongside Ship). In this arrangement, the Company receives purchase orders from the Korean trading company rather than directly from Australian customers. Apart from this distinction, the sales process mirrors that of direct export sales. Once production is completed, the Company issues a zero-rated VAT invoice to the Korean trading company to reflect the export nature of the sales.

Apart from the geographic location of customers in the two channels and the related differences in invoicing procedures, the Company conducts its Australian sales through these two channels in an identical manner and at the same level of trade.

A diagram of the sales process is provided in Exhibit B-1.1.

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?

During the investigation period, all of DCM's Australian sales of the GUC were transacted in USD.

The Company did not use forward contracts to hedge against foreign exchange fluctuations associated with its Australian sales of the GUC. In the Company's accounting records, the value of USD-denominated sales transactions is converted into Korean won using the daily exchange rate published by the Bank of Korea.

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

No. This question is not applicable.

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

During the POI, the Company did not maintain a price list or price extras list for its Australian sales of the GUC.

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

No. This question is not applicable.

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

No. The Company did not grant any discounts or rebates to customers on sales of the GUC exported to Australia during the investigation period.

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

No. The Company did not issue any credit notes or debit notes to customers in relation to sales of the GUC exported 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:
   (a) Are you claiming a date other than the invoice date as the date of sale?
   (b) If you are claiming a date other than the invoice date as the date of sale, why does this date better reflect the material terms of sale? Provide evidence to support your claim. Any claim for an adjustment would need to substantively address:
      - whether, why, and to what degree, the considerations in determining price differed between export and domestic sales
      - whether the materials cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials
      - whether contracts were entered into for the materials purchases, and materials inventory valuation.

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

The Company generates a billing document in its SAP system upon completion of shipment at the port of export (corresponding to the bill of lading date) or at DCM's plant. The billing date recorded in the SAP system serves as the accounting date of sale. Accordingly, DCM reports the billing date, which also functions as the accounting date of sale, as the date of sale in Section B-2, Australian Sales.

The invoice date shown on the commercial invoice or tax invoice reflects the date on which the invoice was prepared and may not necessarily correspond to the actual date of issuance or the delivery status of the sale.

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*[2].
    - 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 Section B-2, Australian Sales, in the attached EQR spreadsheet.

2. For any sales exported to Australia through an intermediary, add the following to the "B-2 Australian sales spreadsheet" for those transactions:
    a. Name of the end customer in Australia
    b. Price at which the goods are sold to that customer
    c. The delivery terms of the sale to that customer

DCM made a portion of its GUC sales to Australia through unrelated Korean trading companies during the period of investigation. For these transactions, DCM recorded the name of the Australian end customer in its SAP system for reference purposes, but did not maintain in its records the final resale price to that customer or the delivery terms of the resale transaction. This information is only available to the trading companies and its Australian customers. As DCM and the unrelated Korean trading companies are independent entities, DCM was not in a position to compel those trading companies to provide such information.

DCM reported the names of the final users, as recorded in its sales report, in "B-2 Australian Sales".

3. 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".

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[2] Please refer to the [Dumping Commodity Register] for detail on exempt goods.

The Company has provided, in the attached EQR spreadsheet, a table identifying the data source for each column in "B-2 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)

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

The Company provides supporting documents for the two largest sample export sales to Australia in Exhibit B-3.1.

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 Company provides, in Exhibit B-3.2, worksheets reconciling the data reported in "B-2 Australian Sales" to the corresponding source documents.

B-4 Reconciliation of sales to financial accounts

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

Please refer to Section B-4, Upwards Sales, in the attached EQR Worksheet.

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

Supporting documents outlining the methodology for "B-4 Upwards Sales" are provided in Exhibit B-4.2.

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

The Company has specified the source document names and corresponding account codes in each column in the "B-4 Upwards Sales" worksheet.

SECTION C
EXPORTED GOODS & LIKE GOODS

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

C-1 Models exported to Australia

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

During the investigation period, the Company exported galvanised steel and GIX steel products to Australia. A detailed description of the GUC exported to Australia is provided in Exhibit C-1.1.

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

The list of MCCs of the goods exported to Australia is provided in Exhibit C-1.2.

MCC	
1-C-Z-P-Y1-1-B-C	4-C-Z-P-Y2-3-B-C
1-C-Z-P-Y1-2-B-C	4-C-Z-P-Y2-5-B-C
1-C-Z-P-Y1-3-B-C	4-C-Z-P-Y3-4-B-C
2-C-Z-P-Y1-1-B-C	4-C-Z-P-Y4-3-B-C
2-C-Z-P-Y1-2-B-C	4-C-Z-P-Y4-4-B-C
2-C-Z-P-Y1-2-C-C	5-C-Z-P-Y1-3-B-C
2-C-Z-P-Y1-3-B-C	5-C-Z-P-Y1-3-C-C
2-C-Z-P-Y1-3-C-C	5-C-Z-P-Y1-3-C-S
2-C-Z-P-Y1-5-C-C	5-C-Z-P-Y1-5-C-C
2-C-Z-P-Y2-3-B-C	5-C-Z-P-Y2-1-B-C
2-C-Z-P-Y2-5-B-C	5-C-Z-P-Y2-3-B-C
3-C-Z-P-Y1-2-B-C	5-C-Z-P-Y2-5-B-C
3-C-Z-P-Y1-2-C-C	5-C-Z-P-Y3-1-B-C
3-C-Z-P-Y1-3-B-C	5-C-Z-P-Y3-3-C-C
3-C-Z-P-Y1-3-C-C	5-C-Z-P-Y3-4-B-C
3-C-Z-P-Y1-5-B-C	5-C-Z-P-Y3-4-C-C
3-C-Z-P-Y1-5-C-C	6-C-Z-P-Y1-3-B-C
3-C-Z-P-Y2-3-B-C	6-C-Z-P-Y2-5-B-C
3-C-Z-P-Y4-3-B-C	6-C-Z-P-Y3-4-B-C
4-C-Z-P-Y1-2-B-C	6-C-Z-P-Y3-4-C-C
4-C-Z-P-Y1-3-B-C	7-C-Z-P-Y1-3-B-C
4-C-Z-P-Y1-3-C-C	7-C-Z-P-Y3-4-B-C
4-C-Z-P-Y1-5-C-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.

The domestic product is alike in all respects to the goods under consideration exported to Australia as it:

- **is indistinguishable from the exported goods during production, given that both the exported and domestic products are manufactured using the same processes.**
- **is produced at the same facility (Busan factory), using identical raw materials and manufacturing processes.**
- **is categorized under the same product coding scheme within the Company's operational framework.**
- **performs equivalently, serving similar functional purposes and end-use applications.**

The Company provides in Exhibit C-2.1 a relevant description for the goods sold in the domestic market.

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

The list of MCCs of the goods sold on the domestic market is provided in Exhibit C-2.2.

MCC				
1-C-Z-N-Y1-1-B-C	2-C-Z-N-Y4-3-B-C	3-C-Z-P-Y5-1-B-C	5-C-Z-N-Y1-5-C-C	6-C-Z-N-Y5-2-B-C
1-C-Z-N-Y1-1-C-C	2-C-Z-N-Y4-3-C-C	3-C-Z-P-Y5-1-C-C	5-C-Z-N-Y2-1-B-C	6-C-Z-N-Y5-2-C-C
1-C-Z-N-Y1-2-B-C	2-C-Z-N-Y5-1-B-C	3-C-Z-P-Y5-2-B-C	5-C-Z-N-Y2-2-B-C	6-C-Z-P-Y1-1-B-C
1-C-Z-N-Y1-2-C-C	2-C-Z-N-Y5-1-C-C	3-C-Z-P-Y5-2-C-C	5-C-Z-N-Y2-2-C-C	6-C-Z-P-Y1-2-B-C
1-C-Z-N-Y1-3-B-C	2-C-Z-N-Y5-2-B-C	4-C-Z-N-Y1-1-C-C	5-C-Z-N-Y2-3-B-C	6-C-Z-P-Y1-2-C-C
1-C-Z-N-Y1-3-C-C	2-C-Z-N-Y5-2-C-C	4-C-Z-N-Y1-2-B-C	5-C-Z-N-Y2-4-B-C	6-C-Z-P-Y1-3-B-C
1-C-Z-N-Y2-2-B-C	2-C-Z-N-Y5-3-C-C	4-C-Z-N-Y1-2-C-C	5-C-Z-N-Y2-5-B-C	6-C-Z-P-Y1-3-C-C
1-C-Z-N-Y2-2-C-C	2-C-Z-P-Y1-1-B-C	4-C-Z-N-Y1-3-B-C	5-C-Z-N-Y3-2-B-C	6-C-Z-P-Y2-1-B-C
1-C-Z-N-Y2-3-C-C	2-C-Z-P-Y1-1-C-C	4-C-Z-N-Y1-3-C-C	5-C-Z-N-Y3-3-C-C	6-C-Z-P-Y2-2-B-C
1-C-Z-N-Y2-5-C-C	2-C-Z-P-Y1-2-B-C	4-C-Z-N-Y1-5-B-C	5-C-Z-N-Y3-4-B-C	6-C-Z-P-Y2-3-B-C
1-C-Z-N-Y4-1-B-C	2-C-Z-P-Y1-2-C-C	4-C-Z-N-Y1-5-C-C	5-C-Z-N-Y3-5-C-C	6-C-Z-P-Y2-3-C-C
1-C-Z-N-Y4-1-C-C	2-C-Z-P-Y1-3-C-C	4-C-Z-N-Y2-2-C-C	5-C-Z-N-Y4-2-B-C	6-C-Z-P-Y2-4-B-C
1-C-Z-N-Y4-2-B-C	2-C-Z-P-Y1-5-C-C	4-C-Z-N-Y2-3-B-C	5-C-Z-N-Y4-3-B-C	6-C-Z-P-Y4-2-B-C
1-C-Z-N-Y4-2-C-C	2-C-Z-P-Y2-2-B-C	4-C-Z-N-Y2-3-C-C	5-C-Z-N-Y5-2-B-C	6-C-Z-P-Y5-2-B-C
1-C-Z-N-Y4-3-B-C	2-C-Z-P-Y2-2-C-C	4-C-Z-N-Y2-4-B-C	5-C-Z-N-Y5-2-C-C	6-C-Z-P-Y5-2-C-C
1-C-Z-N-Y4-3-C-C	2-C-Z-P-Y4-1-B-C	4-C-Z-N-Y2-4-C-C	5-C-Z-P-Y1-1-B-C	7-C-Z-N-Y1-1-B-C
1-C-Z-N-Y5-1-B-C	2-C-Z-P-Y4-2-B-C	4-C-Z-N-Y3-3-C-C	5-C-Z-P-Y1-1-C-C	7-C-Z-N-Y1-2-B-C
1-C-Z-N-Y5-1-C-C	2-C-Z-P-Y4-2-C-C	4-C-Z-N-Y3-4-C-C	5-C-Z-P-Y1-2-B-C	7-C-Z-N-Y1-3-B-C
1-C-Z-N-Y5-2-B-C	2-C-Z-P-Y5-1-B-C	4-C-Z-N-Y4-2-B-C	5-C-Z-P-Y1-2-C-C	7-C-Z-N-Y1-5-C-C
1-C-Z-N-Y5-2-C-C	2-C-Z-P-Y5-1-C-C	4-C-Z-N-Y4-3-B-C	5-C-Z-P-Y1-3-B-C	7-C-Z-N-Y2-2-B-C
1-C-Z-P-Y1-1-B-C	2-C-Z-P-Y5-2-B-C	4-C-Z-N-Y5-2-B-C	5-C-Z-P-Y1-3-C-C	7-C-Z-N-Y4-2-B-C
1-C-Z-P-Y1-1-C-C	2-C-Z-P-Y5-2-C-C	4-C-Z-N-Y5-2-C-C	5-C-Z-P-Y1-4-C-C	7-C-Z-P-Y1-1-B-C
1-C-Z-P-Y1-2-B-C	3-C-Z-N-Y1-1-B-C	4-C-Z-N-Y5-3-C-C	5-C-Z-P-Y1-5-C-C	7-C-Z-P-Y1-1-C-C
1-C-Z-P-Y1-2-C-C	3-C-Z-N-Y1-1-C-C	4-C-Z-P-Y1-1-B-C	5-C-Z-P-Y2-1-B-C	7-C-Z-P-Y1-2-B-C
1-C-Z-P-Y1-3-B-C	3-C-Z-N-Y1-2-B-C	4-C-Z-P-Y1-1-C-C	5-C-Z-P-Y2-1-C-C	7-C-Z-P-Y1-2-C-C
1-C-Z-P-Y2-2-B-C	3-C-Z-N-Y1-2-C-C	4-C-Z-P-Y1-2-B-C	5-C-Z-P-Y2-2-B-C	7-C-Z-P-Y1-3-B-C
1-C-Z-P-Y2-2-C-C	3-C-Z-N-Y1-3-B-C	4-C-Z-P-Y1-2-C-C	5-C-Z-P-Y2-2-C-C	7-C-Z-P-Y1-5-C-C
1-C-Z-P-Y2-5-C-C	3-C-Z-N-Y1-3-C-C	4-C-Z-P-Y1-3-B-C	5-C-Z-P-Y2-3-B-C	7-C-Z-P-Y2-1-B-C
1-C-Z-P-Y4-1-B-C	3-C-Z-N-Y1-5-B-C	4-C-Z-P-Y1-3-C-C	5-C-Z-P-Y2-3-C-C	7-C-Z-P-Y2-2-B-C
1-C-Z-P-Y4-2-B-C	3-C-Z-N-Y2-2-B-C	4-C-Z-P-Y1-4-B-C	5-C-Z-P-Y2-4-B-C	
1-C-Z-P-Y4-2-C-C	3-C-Z-N-Y2-2-C-C	4-C-Z-P-Y1-5-B-C	5-C-Z-P-Y2-4-C-C	
1-C-Z-P-Y4-3-B-C	3-C-Z-N-Y2-3-C-C	4-C-Z-P-Y1-5-C-C	5-C-Z-P-Y4-2-B-C	
1-C-Z-P-Y4-3-C-C	3-C-Z-N-Y4-1-B-C	4-C-Z-P-Y2-1-B-C	5-C-Z-P-Y5-2-B-C	
1-C-Z-P-Y5-1-B-C	3-C-Z-N-Y4-2-B-C	4-C-Z-P-Y2-2-B-C	5-C-Z-P-Y5-2-C-C	
1-C-Z-P-Y5-1-C-C	3-C-Z-N-Y4-2-C-C	4-C-Z-P-Y2-2-C-C	6-C-Z-N-Y1-2-B-C	
1-C-Z-P-Y5-2-B-C	3-C-Z-N-Y5-1-B-C	4-C-Z-P-Y2-3-B-C	6-C-Z-N-Y1-2-C-C	
1-C-Z-P-Y5-2-C-C	3-C-Z-N-Y5-2-B-C	4-C-Z-P-Y2-3-C-C	6-C-Z-N-Y1-3-B-C	
2-C-Z-N-Y1-1-B-C	3-C-Z-N-Y5-2-B-S	4-C-Z-P-Y2-4-B-C	6-C-Z-N-Y1-3-C-C	
2-C-Z-N-Y1-1-C-C	3-C-Z-N-Y5-2-C-C	4-C-Z-P-Y4-2-B-C	6-C-Z-N-Y2-1-B-C	
2-C-Z-N-Y1-2-B-C	3-C-Z-P-Y1-1-B-C	4-C-Z-P-Y4-2-C-C	6-C-Z-N-Y2-2-B-C	
2-C-Z-N-Y1-2-C-C	3-C-Z-P-Y1-1-C-C	4-C-Z-P-Y5-1-B-C	6-C-Z-N-Y2-2-C-C	
2-C-Z-N-Y1-3-B-C	3-C-Z-P-Y1-2-B-C	4-C-Z-P-Y5-1-C-C	6-C-Z-N-Y2-3-B-C	
2-C-Z-N-Y1-3-C-C	3-C-Z-P-Y1-2-C-C	4-C-Z-P-Y5-2-B-C	6-C-Z-N-Y2-3-C-C	
2-C-Z-N-Y1-5-C-C	3-C-Z-P-Y1-3-B-C	4-C-Z-P-Y5-2-C-C	6-C-Z-N-Y2-4-B-C	
2-C-Z-N-Y2-2-B-C	3-C-Z-P-Y1-3-C-C	5-C-Z-N-Y1-1-B-C	6-C-Z-N-Y2-5-B-C	
2-C-Z-N-Y2-2-C-C	3-C-Z-P-Y1-4-C-C	5-C-Z-N-Y1-1-C-C	6-C-Z-N-Y3-2-B-C	
2-C-Z-N-Y2-3-C-C	3-C-Z-P-Y2-1-B-C	5-C-Z-N-Y1-2-B-C	6-C-Z-N-Y3-3-C-C	
2-C-Z-N-Y4-1-B-C	3-C-Z-P-Y2-2-B-C	5-C-Z-N-Y1-2-C-C	6-C-Z-N-Y3-4-B-C	
2-C-Z-N-Y4-2-B-C	3-C-Z-P-Y4-2-B-C	5-C-Z-N-Y1-3-B-C	6-C-Z-N-Y3-4-C-C	
2-C-Z-N-Y4-2-C-C	3-C-Z-P-Y4-2-C-C	5-C-Z-N-Y1-3-C-C	6-C-Z-N-Y4-2-B-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.
   (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.
   (c) Provide a table of showing the product or SKU codes for each MCC.
   If no:
   (a) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.

The Company assigns a unique twelve-digit internal product code to the GUC as part of its ordinary course of business. A reference key explaining the product codes is provided in Exhibit C-3. These internal product codes are consistently used across the Company's sales, production, and cost accounting processes within its SAP system.

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

Domestic customers typically access the Company's sales system directly, submitting a draft order sheet through the OMS (Order Management System) module. The Company's sales staff reviews and approves these orders and transmits them to the factory. Some customers place orders verbally or via e-mail. Written order confirmations are not issued; instead, all confirmed sales orders are recorded within the Company's OMS and SAP systems, enabling domestic customers to monitor their order status through the online platform.

Once the orders are confirmed, the Company's sales team prepares an internal order sheet for production, which is dispatched to Busan factory. The factory subsequently incorporates the order into its production schedule.

For the domestic market sales, the goods are manufactured both to stock and on a made-to-order basis. Prices are determined through negotiations, using internal price guidance as reference.

At the point of shipment and billing, all sales terms, quantities, and final selling prices are finalized. The shipping department at the Busan factory issues a shipping note for the specific transaction. Simultaneously, the Company's SAP generates an internal billing document, recording the sales within both sales and accounting modules.

In compliance with the Korean Value Added Tax Law, tax invoices are generated and sent to the domestic customers on a shipment-by-shipment

basis, fortnightly (covering all shipments within the two-week period), or monthly (covering all shipments during the month), depending on the customer's preference.

For domestic customers, the Company generally allows a credit period based on each customer's financial standing, in line with ordinary business practice in the Korean domestic market. Customers settle their tax invoices by bank transfer or promissory note, either as a lump-sum payment or in instalments.

Exhibit D-1.1 contains detailed charts illustrating the domestic sales process.

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

During the Period of Investigation, the Company had only one related domestic customer, Aju Steel. Aju Steel uses the GUC as an input to produce non-GUC color-coated steel.

A list of the related domestic customer is provided in Exhibit D-1.2.

The selling price is determined based on market conditions and on an arm's-length basis.

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

The Company does not maintain fixed price lists. Instead, its domestic sales team negotiates pricing with customers on an order-by-order basis, with reference to internal price guideline by month. The internal price guideline is provided in Exhibit D-1.3.

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.

No. The Company does not differentiate domestic selling prices by distribution channel. Rather, prices are negotiated based primarily on prevailing market conditions, long-term commercial relationships, and the Company's prior experience with each customer.

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.

   The Company did not provide any on-invoice or off-invoice discounts or rebates concerning the domestic sale of the like goods during the period.

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

   The Company did not issue any credit or debit notes to the customer or any of its associates in relation to sales of the like goods during the period.

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

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

For domestic sales, the Company recognises the billing invoice date as the date of sale. This date coincides with the shipment date and the accounting record date. Accordingly, the billing invoice date has been reported as the date of sale.

As noted above, in the domestic market, it is customary to issue tax invoices either at month-end or on a fortnightly basis. As a result, the tax invoice date may not always correspond to the date of sale.

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.

In accordance with the instructions, the Company provides the "D-2 Domestic Sales" worksheet in the attached EQR Spreadsheet.

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".

Exhibit D-2.2 of the attached EQR Spreadsheet provides a description of each column and identifies the corresponding source of the data.

D-3 Sample domestic sales documents

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

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

The Company provides the supporting documentation for the two largest domestic sales invoices by value, as detailed in Exhibit D-3.1.

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

The Company provides reconciliation worksheets for the two largest sample transactions by value, showing how the supporting documents reconcile to the "D-2 Domestic Sales" worksheet, as detailed in Exhibit D-3.2.

D-4 Reconciliation of sales to financial accounts

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

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

Please refer to "B-4 Upwards Sales" provided above.

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

- For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:
  - Sales of the goods under consideration and other sales (e.g. non-goods or services)
  - Domestic and third country sales of the goods under consideration
- If the documents include spreadsheets, all formulas used must be retained
- There must not be any balancing amounts. All amounts must be supported by source documents.

Please refer to the "B-4 Upwards Sales" section above.

The Company provides supporting documents showing the reconciliation of domestic sales to the relevant source records, as outlined in Exhibit D-4.2.

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 <u>and</u>
- highlight or annotate the amount shown in the source document <u>and</u>
- provide the account code and sub-account code (if applicable) at column E of the worksheet.

Please refer to Exhibit B-4, "Upwards Sales," 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 either:
       - summing the accounts receivable opening balance and closing balance for the period, and dividing it by 2, or
       - summing the average monthly accounts receivable 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:

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

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

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

(1) Credit Expense for Domestic Sales

As outlined above, the Company grants credit periods to domestic customers based on their financial standing, in line with normal business practices in Korea and the domestic market.

The Company's SAP system records the actual payment receipt date for each transaction. Accordingly, the Company reports payment terms on a transaction-specific basis by calculating the number of days between the billing invoice date, which corresponds to the shipment date, and the actual payment receipt date.

The Company reported the payment date using the following methodology:

– Full Payment Received: For invoices paid in full through a single payment, the Company reported the actual payment receipt date

– Partial Payment: For invoices settled through multiple instalments, the Company reported the weighted-average payment date.

– Outstanding Payment: For domestic sales with outstanding balances as of June 29, 2026, the Company estimated the payment date based on the

weighted-average credit period, assuming that the outstanding balances were paid on June 29, 2026.

Exhibit E-1.1(1) provides a sample worksheet illustrating how the Company reported payment dates.

The Company calculated the payment term for each transaction as the number of days between the date of sale and the payment date. In addition, the Company reported credit expenses under the "Other Expenses – Credit Expense" category on a transaction-specific basis using the following formula:

Credit Expense = Net Invoice Value x (Payment Date – Date of Sale) x Short-term Interest Rate / 365

Exhibit E-1.1(1) also details the calculation of credit expenses for the domestic sample sales.

(2) Credit Expense for Export Sales to Australia

During the Period, the Company applied two payment terms for export sales to Australia: L/C at sight and local L/C with payment due within 15 days after month-end.

In any event, the Company reports the actual payment receipt date for each transaction based on the records maintained in its SAP system. For L/C transactions, the actual payment receipt date is defined as the date on which the L/C is cleared with the issuing bank.

Exhibit E-1.1(2) provides a sample document illustrating how the Company reported payment clearance dates for individual export sales to Australia.

The Company calculates and reports credit expenses on a transaction-specific basis under the "Other Expenses – Credit Expense" category using the following formula:

Credit Expense = Net Invoice Value x (Payment Date – Date of Sale) x Short-term Interest Rate / 365

Exhibit E-1.1(2) details the calculation of the credit period for the sample export sales to Australia.

In addition, the Company calculated the short-term interest rate applicable to usance borrowings during the Period. Exhibit E-1.1(2) provides a supporting worksheet detailing the calculation, together with the corresponding supporting documentation.

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?

The Company calculated the Korean won-denominated short-term interest rate for the Period. Exhibit E-1.2 provides a supporting worksheet detailing the calculation, together with the relevant supporting documentation.

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?

Although the Company maintains a certain level of deposits, such deposits are not maintained primarily for the purpose of earning interest income. In managing its short-term borrowings, the Company prioritizes the repayment of those borrowings when sufficient funds become available. Nevertheless, the Company maintains deposits to ensure sufficient liquidity for immediate withdrawals to meet short-term working capital requirements.

The average interest rate earned on the Company's Korean won-denominated term deposits during the Period was approximately [redacted]%.

4. If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):
   (a) Do you have short term borrowings or an overdraft facility denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?
   (b) Do you have any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

Australian customers of DCM settle payments through a USD-denominated account. DCM holds short-term borrowings denominated in foreign currency, with the average interest rate specified in Exhibit E-1.4.

Although the Company holds a certain amount of deposits in foreign currency, their primary purpose is not interest accrual or income generation. In line with the Company's practice of managing short-term borrowings, it prioritises redeeming these borrowings as funds become available. Nevertheless, the Company maintains deposits to ensure liquidity for immediate withdrawals to meet short-term working capital requirements.

During the period, the average interest rate earned on the Company's USD-denominated term deposits was approximately [redacted]%.

E-2 Packaging

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

The Company uses various packing materials, including steel plates, steel bands, skids, and others.

The packing cost for each type of packing used in domestic sales is provided in Exhibit E-2.1.

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

The Company uses various packing materials, such as steel plates, steel bands, and skids.

The packing cost for each packing type used in exports to Australia is also provided in Exhibit E-2.1.

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

The Company traced the actual packing cost recorded in its normal cost accounting system for each transaction and reported that actual packing cost in the domestic and Australian sales listings. It should be noted that the packing costs recorded in the normal cost accounting system consist only of purchased packing material costs. In some cases, the Company uses its own semi-finished goods as packing materials, and the cost of those semi-finished goods is included in manufacturing costs rather than packing costs.

Weighted-average packing costs are provided in Exhibit E-2.1.

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?

The Company's domestic sales were made either on a delivered basis or an ex-factory basis. Actual freight costs were reported in the "Inland Transport" field of the D-2 Domestic Sales listing.

Sample documents demonstrating the inland freight expenses incurred for transportation from the plant to the designated location are provided in Exhibit E-3.1.

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

During the Period, the Company's Australian sales were made on EXW (Ex Works), FAS (Free Alongside Ship), and FOB (Free On Board).

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?

The Company is responsible for inland transportation from the plant to the port of exportation. Accordingly, the Company reports the inland freight actually paid on a transaction-specific basis in the "Inland Transport" field of the Australian sales listing.

The Company provides sample documents demonstrating the calculation of the inland transport in Exhibit E-3.3.

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?

The Company is responsible for port handling and related charges in accordance with the applicable shipping terms. Accordingly, the Company reports the actual charges incurred on a transaction-specific basis in the "Handling & Other" field of the Australian sales listing.

Exhibit E-3.4 provides the relevant calculations and supporting documents.

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?

Not applicable. The Company was not responsible for ocean freight for Australian sales during the period.

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. The Company was not responsible for marine insurance for Australian sales during the period.

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

Not applicable. The Company did not make any Australian sales on a delivered duty paid ("DDP") basis during the period.

E-4 Other direct selling expenses

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

No. The Company did not pay any sales commissions on domestic sales or exports to Australia during the Period.

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?

Domestic sales of like goods are subject to value-added tax at the standard rate of 10 percent under the Korean Value Added Tax Law, whereas export sales of the goods, including local trader export sales, are zero-rated. VAT collected from domestic customers is recorded separately from sales revenue and remitted to the Korean tax authorities; it is not included in the selling prices reported in "D-2 Domestic Sales". Accordingly, all prices reported in B-2 and D-2 are exclusive of VAT, and the difference in VAT treatment does not affect the comparison between export prices and domestic prices. In this regard, there are no material differences affecting the comparison between the prices charged for Australian sales and the Company's domestic sales.

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

The Company reported the warranty claim expense for each applicable domestic sale in "Technical and After Sales Support" of D-2. The warranty cost reported was determined by tracing warranty claims to the corresponding coil number or sales transaction.

Supporting documents showing a sample warranty claim expense for domestic sales are provided in Exhibit E-4.3.

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

The Company reported the bank charges incurred when it received payment from its customer. Supporting documents showing a sample bank charge are provided in Exhibit E-4.4.

E-5 Other adjustment claims

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details and supporting documentation.
   - An adjustment will only be made where there is evidence that the difference affects price comparability.
   - Refer to Chapter 15 of the *Dumping and Subsidy Manual (December 2021)*[3] for more information.

[3] Available on the commission website

This question is not applicable.

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.

   The sales process for export sales to third countries does not differ from the sales process described in B-1.

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

   There were several related customers in third-country markets, a list of which is provided in Exhibit F-1.2. Selling prices were determined through negotiations between the Company and those related customers based on market conditions.

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.

   The Company claims the billing date recorded in its SAP system as the date of sale for third country sales, consistent with its practice for Australian and domestic sales as described in B-1.8 and D-1.8. Because the same date-of-sale basis is applied uniformly across all markets, the sales listings in B-2, D-2 and F-2 and the corresponding cost data are matched on a consistent basis, and the substantive considerations set out in B-1.8 apply equally to third country 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.

The Company provides the worksheet titled “F-2 Third Country Sales” as part of the attached EQR Spreadsheet, in accordance with the instructions.

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

The Company also provides, as part of the attached EQR spreadsheet, the worksheet titled “F-2.2 Third Country Sales Source”, which identifies the data source for each column in “F-2 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.

There are no differences in sales to third countries that would affect their comparison to export sales to Australia. As described in F-1.1, the sales process, level of trade, and terms of sale for third country sales are the same as those for Australian sales, although selling prices may vary depending on market conditions and customer characteristics in each market. In any event, the Company notes that the Commission will have sufficient information concerning the Company's domestic sales of like goods for the purposes of determining normal value.

SECTION G
COST TO MAKE AND SELL

G-1 Production process

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

The Company provides, in Exhibit G-1.1(1), a description of the production process, including each stage of the process. The Company produces the GUC, as well as other products, at its Busan Factory, and provides in Exhibit G-1.1(2) a list of the products produced there. In addition, the Company provides, in Exhibit G-1.1(3), a list of scrap generated from the production of the GUC.

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.

During the Period, the Company procured its raw material, hot-rolled steel, from an affiliated supplier, Dongkuk Corporation (a Japanese trading company). In addition, the Company engaged Intergis for transportation services and Dongkuk Systems for computer system maintenance and office supplies.

A list of all affiliated suppliers is provided in Exhibit G-1.2.

G-2 Cost accounting practices

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

The Company's cost accounting system is based on actual costs. While the SAP system technically maintains standard costs for interim valuation during the month, all costs are revalued to actual costs at month-end, and only actual costs are used for financial reporting and for the cost data reported in this response.

2. If your company uses standard costs:
   (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?
   (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
   (c) How were those variances allocated?

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

As the Company's cost accounting system is based on actual costs, this question is not applicable.

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

The Company's SAP cost accounting practices align with the traditional process costing method. During the Period, the Company tracked the actual manufacturing costs of the Goods through its SAP system, which calculates production costs by month, plant, product code, and sales order. In calculating the manufacturing cost of a finished product, the Company accumulates costs from the raw material stage through multiple semi-finished product stages.

The cost accounting system is an integral part of the Company's financial accounting system and supports the preparation of the Company's audited financial statements. A flowchart of the cost accounting system is provided in Exhibit G-2.3. The Company's cost accounting system is structured so that all costs incurred at the manufacturing works level are recorded as production costs and subsequently allocated to cost of sales. Expenses incurred by various corporate departments, including sales, corporate administration, and business planning, are classified as selling, general and administrative ("SG&A") expenses.

The SAP system records both actual costs and standard costs for each production order. Standard costs are used solely for interim inventory valuation purposes during the month. At each month-end, the SAP system calculates actual costs and fully revalues all production and inventory from standard to actual costs, such that no standard-to-actual variances remain unallocated. Accordingly, all costs reported in this response, including the cost data in G-3 and G-5, are actual costs.

These month-end actual costs are transferred to the financial accounting system and serve as the basis for cost of goods sold and inventory valuation in the Company's audited financial statements.

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 cost centres, together with the relevant allocation methodologies and corresponding descriptions, is provided in Exhibit G-2.4.

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

   The Company tracks actual manufacturing costs through its SAP system, which calculates production costs by month, plant, product code, and sales order.

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

   Not applicable. This is because the Company's SAP system calculates actual production costs, which serve as the basis for valuing cost of goods sold and finished goods inventory in the financial accounting system. The Company's cost accounting system is directly reconciled to its financial accounting system.

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

   The Company did not engage in any start-up operations for the GUC during the period.

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

   Inventory costs are determined using the monthly weighted-average method at the level of month, plant, product code, and sales order, except for materials in transit, which are valued using the specific identification method. For interim and annual financial reporting purposes, inventories are stated at the lower of cost and net realisable value.

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

Damaged or sub-standard ("non-prime") goods are identified and classified by the Company's production teams either during production or upon completion of production. These goods are sold as non-prime goods in different quality grades, depending on the nature and extent of the defects.

The Company calculates the actual manufacturing cost of non-prime goods.

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

During the production process, the Company generates various types of scrap. Steel scrap is valued at prevailing market prices. The monthly value of scrap generated during production is deducted from manufacturing costs.

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

Except for the royalty fee paid to Dongkuk Holdings, no management fees or corporate allocations are charged to the Company by its parent or related companies.

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM".
   - This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
   - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
   - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.
   - If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

The Company provides the worksheet titled "G-3 Domestic CTM" as part of the attached EQR Spreadsheet, in accordance with the instructions.

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”.

In accordance with the instructions provided, the Company has included the worksheet titled “G-3.2 Domestic CTM Source” in the attached EQR spreadsheet.

G-4 Selling, General & Administrative expenses

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

The Company has included the worksheet titled “G-4.1 SG&A Listing” in the attached EQR spreadsheet, in accordance with the instructions.

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

The Company has included the worksheet titled “G-4.2 Domestic SG&A Calculation” in the attached EQR spreadsheet, in accordance with the instructions.

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

The Company has included the worksheet titled 'G-4.3 Upwards SG&A' in the attached EQR spreadsheet, in accordance with the instructions.

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

The relevant general ledger accounts for all SG&A expenses for fiscal year 2025, which is the Period, are provided in Excel format in Exhibit G-4.4.

G-5 Cost to make the goods exported to Australia

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

The Company provides the worksheet titled "G-5 Australian CTM" as part of the attached EQR spreadsheet, in accordance with the instructions.

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".

In accordance with the instructions, the Company has included the worksheet titled "G-5.2 Australian CTM Source" in the attached EQR spreadsheet.

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

Because the Company maintains total actual manufacturing costs by month, plant, product code, and "sales order", it is able to trace manufacturing costs by sales order, which in turn can be linked to the relevant market, i.e., domestic sales or exports to Australia.

The Company provides the following explanation of how manufacturing costs are calculated for each cost component:

(a) Raw Materials

The Company uses SAP ERP 6.0, which calculates the actual costs of hot-rolled steel coils, semi-finished cold-rolled products, and coating sub-materials, net of scrap.

The Company maintains total actual manufacturing costs by month, plant, product code, and sales order, as well as costs for the following twenty-one cost elements: (1) Raw Material Cost, (2) Raw Material – Purchased Semi-Finished Goods, (3) Sub Material, (4) Scrap, (5) Scrap-Deduction, (6) Electricity-Variable (7) Fuel, (8) Water, (9) Oil, (10) Packing, (11) Roll, (12) Refractory, (13) Chemicals, (14) Labour-Others, (15) Outside Tolling, (16) Depreciation, (17) Repair/MRO, (18) Other Overhead, (19) Sub Contract Service, (20) Labour-Base, and (21) Electricity-Base.

The Company reports the sum of (1) Raw Material Cost, (2) Raw Material – Purchased Semi-Finished Goods, and (4) Scrap, less (5) Scrap-Deduction, as "Raw Material Cost".

(b) Other Material Costs

The Company also reports (3) Sub Material as the "Other Material Costs".

(c) Direct Labour Cost

These costs include expenses for all production workers, inspection and testing personnel, and other employees engaged in production activities at the Busan factory. Consistent with the Company's normal cost accounting records, which capture all labour costs incurred at the manufacturing works level without further segregation between direct and indirect production labour, the Company reports the sum of (14) Labour – Others and (20) Labour – Base as "Direct Labour Cost".

(d) Manufacturing Overheads

All actual manufacturing overhead costs are allocated through the Company's SAP actual cost accounting system by month, plant, product code, and sales order.

The Company reports the sum of (6) Electricity – Variable, (7) Fuel, (8) Water, (9) Oil, (11) Roll, (12) Refractory, (13) Chemicals, (15) Outside Tolling, (16) Depreciation, (17) Repair/MRO, (18) Other Overhead, (19) Sub Contract Service, and (21) Electricity – Base as the "Cost of Manufacturing Overhead."

(e) Other Costs

The Company reports (10) Packing as the "Other Costs."

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.

Exhibit G-6.2 provides a worksheet and supporting documents demonstrating the calculation of manufacturing costs for the largest domestic sales sample, titled "Sample Cost Calculation for the MCC with the Largest Sales Volume in the Domestic Market."

G-7 Major raw material costs

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

The primary raw material used in the Company's production of the Goods is "hot-rolled steel".

The Company uses SAP ERP 6.0, which calculates the actual costs of hot-rolled steel coils, semi-finished cold-rolled products, and coating sub-materials, net of scrap.

The Company reports the sum of (1) Raw Material Cost, (2) Raw Material – Purchased Semi-Finished Goods, (4) Scrap and net of (5) Scrap-Deduction,

as the “Raw Material Cost”. The Company also reports (3) Sub Material as the “Other Material Costs”.

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.

During the Period, the Company procured its raw material, hot-rolled steel, from an affiliated supplier, Dongkuk Corporation (a Japanese trading company). However, Dongkuk Corporation is not a manufacturer of hot-rolled steel but rather a trading company. Therefore, the information required by G-7.2 is not applicable.

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

The Company provides the worksheet to calculate the weighted average percentage of each raw material cost as a proportion of total cost to make as Exhibit G-7.3.

4. For each raw material identified in G-7.3 which individually account for <u>10% or more</u> 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.

The primary raw material used in the production of the Goods is hot-rolled steel, and the only sub-material individually accounting for 10% or more is zinc.

In both G-3 Domestic CTM and G-5 Australian CTM, the cost of hot-rolled steel is included in “Raw Material Cost”, while the cost of zinc is included in “Other Material Costs”.

The Company provides information on the purchases of hot-rolled steel and zinc in the worksheet titled "G-7.4 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.

The Company provides a table listing the source of the data for each column of the "G-7.4 Raw material purchases" in Exhibit G-7.5.

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.

The Company provides the supporting documents for two largest invoices by value in Exhibit G-7.6.

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.

During the Period, the Company procured its raw material, hot-rolled steel, from an affiliated supplier, Dongkuk Corporation, a Japanese trading company. Pricing was established through negotiations with Dongkuk Corporation based on prevailing market rates. As shown in Dongkuk Corporation's financial statements provided in Exhibit A-4.1(4), Dongkuk Corporation was profitable during the Period.

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

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

The Company provides the worksheet titled "G-8 Upwards Costs" as part of the attached EQR spreadsheet, in accordance with the instructions.

For more detailed reconciliation, the Company also provides a cost reconciliation chart and supporting documents in Exhibit G-8.2.

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

Supporting documents showing how “G-8 Upwards Costs” were reported are provided in Exhibit G-8.2.

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

The Company explains the source documents in “G-8 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.

The Company reported the production quantities as recorded in its production control system. The reported production quantities also reconcile directly to those recorded in the Company’s SAP cost report.

Supporting documents demonstrating that the production quantities reported in G-3 and G-5 reconcile to the SAP cost report are provided in Exhibit G-9.1.

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.

Within its SAP system, the Company tracks production quantities for each finished product down to the batch number level, which is the most specific level possible.

The Company utilised kilograms ("KG") or metric tonnes (MT) to record and track the quantities of the Goods produced. In Exhibit G-9.2, Dongkuk provided sample reports illustrating its production control 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".

Differences may arise between production quantities and sales volumes where inventory is held. The Company manages production quantities through its SAP system to optimise productivity. However, due to the nature of the industry, sales volumes and production quantities do not always align. In principle, the Company determines production volume and product mix based on customer orders. The production plan, which sets out the planned production volume and product mix, is prepared on a monthly basis.

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?

The Company uses both make-to-order and make-to-stock production methods. In general, export sales are produced on a make-to-order basis, whereas domestic sales are produced on both a make-to-order and make-to-stock basis. The production plan, which outlines the planned production volume and product mix, is prepared monthly.

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

The Company generally prepares a monthly production plan to determine production volume. This plan may be adjusted at any time in response to various market or operational factors. For example, adjustments may be required due to issues with production lines, fluctuations in raw material inventories, changes in sales volume driven by market demand, or the need to accommodate urgent orders. Accordingly, the production cycle is reviewed on a monthly basis and adjusted as necessary in light of these circumstances.

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.

In accordance with the instructions, the Company has included the worksheet titled “G-10 Capacity Utilisation” in the attached EQR spreadsheet.

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

A worksheet detailing the calculation of production capacity and capacity utilisation is provided in Exhibit G-10.2.

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

The Company’s only facility for producing and selling the Goods is the Busan factory. The Company provides, in Exhibit G-10.3, monthly inventory movement records maintained during the investigation period, together with the average inventory holding period calculation.

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.

No. There have been no changes to the type of capital or technology utilised by the Company in the manufacturing 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.

Not applicable. The Company does not operate any plant capable of producing inputs used to make the Goods, as all such raw materials are purchased externally.

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.

   There have been no significant investments to upgrade, refurbish, or build any of the plants used in the production of the goods in the past five years.

EXPORTER'S DECLARATION

I hereby declare that **Dongkuk Coated Metal co., Ltd** have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this questionnaire is complete and correct to the best of my knowledge and belief.

Name : **Hwanok Kim**

Signature :

Position in Company : **General Manager of Trade Affairs Team**

Date : **July 27, 2026**