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 Steel Mill Co Ltd and Posco Holdings Inc, and from the Socialist Republic of Vietnam by Hoa Sen Group Joint Stock Company and Nam Kim Steel Joint Stock Company

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

**Response due by:** 8 June 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 Steel Mill Co Ltd (Dongkuk) 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<br>Company information | ☒ |
| Section B<br>Export sales to Australia | ☒ |
| Section C<br>Exported goods & like goods | ☒ |
| Section D<br>Domestic sales | ☒ |
| Section E<br>Due allowance | ☒ |
| Section F<br>Third country sales | ☒ |
| Section G<br>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 exempt from Australian dumping duties (i.e. Dongkuk, POSCO, Hoa Sen, and Nam Kim) 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:

**Answer:**

**Name: Nguyen Hong Phuoc (Ms)**
**Position in the company: Head of Trade Remedies Department**
**Telephone: +84 971 820 075**
**E-mail address: nguyen.hong.phuoc@hoasengroup.vn**

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

   Name:
   Address:
   Telephone:
   E-mail address:

**Answer:**

**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.*

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

**Answer:**

**The Company's hard-copy financial records are maintained at its representative office located at 183 Nguyen Van Troi, Ward 10, Phu Nhuan District, Ho Chi Minh City, Vietnam. Relevant hard-copy records are also maintained at the Company's subsidiaries and branches, depending on the nature of the records. Electronic financial records are maintained in the Company's ERP system, from which reports can be extracted when needed.**

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

**Answer:**

**The Company's hard-copy production records are primarily maintained at the relevant production plants. Certain related records may also be maintained at the Company's representative office and other relevant units, depending on operational needs. Electronic production records are maintained in the Company's ERP system, from which reports can be extracted when needed.**

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

**Answer:**

**The Company's hard-copy production records are primarily maintained at the relevant production plants. Certain related records may also be maintained at the Company's representative office and other relevant units, depending on operational needs. Electronic**

**production records are maintained in the Company's ERP system, from which reports can be extracted when needed.**

## A-2 Company information

1. What is the legal name of your business?

**Answer:**

**The legal name is "Hoa Sen Group" (HSG).**

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

**Answer:**

**HSG doesn't trade under any different name.**

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

**Answer:**

**HSG was originally incorporated in 2001 as Lotus Joint Stock Company. The company changed its name to Hoa Sen Corporation in March 2007, and then to Hoa Sen Group in November 2007. HSG is a publicly-traded company whose shares are listed on the Ho Chi Minh Stock Exchange.**

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

**Answer:**

**The current Board of Directors of HSG was elected for the 2024–2029 term. There have been no changes to the composition of the Board of Directors during the last two years. The current members of the Board of Directors are as follows:**

| No | Full name | Position |
|---|---|---|
| 1 | [redacted] | Chairman of the Board of Directors |
| 2 | [redacted] | Standing Vice Chairman of the Board of Directors – Executive |
| 3 | [redacted] | Non-Executive Member of the Board of Directors |
| 4 | [redacted] | Non-Executive Member of the Board of Directors |
| 5 | [redacted] | Independent Member of the Board of Directors |
| 6 | [redacted] | Independent Member of the Board of Directors |

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

**Answer:**

**HSG is part of a corporate group and is the parent company within the group.**
**Diagrams of HSG's ownerships are provided in *Exhibit A-2.5.1*.**
**A list identifying the names, addresses, share ownership, and activities of companies related with HSG through direct ownership is provided in *Exhibit A-2.5.2*.**

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.

**Answer:**

**HSG is a publicly-traded company whose shares are listed on the Ho Chi Minh Stock Exchange. HSG is not a subsidiary of any company. According to the shareholder register as of December 8, 2025, which serves as the record date for determining shareholders entitled to attend the Annual General Meeting for fiscal year 2025–2026, the principal shareholder (Shareholder owning 5% or more) is only one [redacted], who holds [redacted]% of the total shares of HSG.**

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

**Answer:**

**The overall nature of HSG's business is manufacturing. The Company manufactures and sells iron and steel products. Its sales are made in both the domestic and international markets.**

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

**Answer:**

**HSG performs all of the functions.**

9. Provide your company's internal organisation chart.

**Answer:**

**HSG provides the relevant organisation chart in *Exhibit A-2.9.***

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

**Answer:**

**HSG provides the functions performed by each group within the organisation in *Exhibit A-2.10.***

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

**Answer:**

**HSG provides the product brochures including goods under consideration details in *Exhibit A-2.11*.**

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[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.

## A-3 General accounting information

1. What is your financial accounting period?

**Answer:**

**The annual accounting period of the Company is from 1 October to 30 September of the following year.**

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

**Answer:**

**HSG's financial statements are audited by auditing firms in Vietnam. Please refer to *Exhibit A-4.1.* The auditor is "PwC (Vietnam) Limited".**

3. What currency are your accounts kept in?

**Answer:**

**HSG's accounts kept in Vietnamese dong.**

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

**Answer:**

**HSG financial accounting system is Oracle Enterprise Resource Planning (ERP).**

5. What is the name of your sales system?

**Answer:**

**HSG sales system is Oracle ERP.**

6. What is the name of your production system?

**Answer:**

**HSG production system is Oracle ERP..**

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

**Answer:**

**HSG's financial accounting, sales, and production systems are integrated and operate through a unified Oracle ERP system, which allows for electronic interaction.**

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

**Answer:**

**No, HSG accounting doesn't practice differ in any way from generally accepted accounting principle in Vietnam (Vietnam Accounting Standards, VAS).**

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

**Answer:**

**No, HSG haven't been any changes to our accounting practices and/or policies over the last two years.**

## A-4 Financial Documents

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

**Answer:**

**HSG two most recent year audited consolidated and unconsolidated financial statements include notes and auditors' opinion are contained in *Exhibit A-4.1.***

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

**Answer:**

**The auditor did not issue a separate audit management letter in connection with HSG's audited separate financial statements. For reference, The Independent Auditor's Report excerpted from the FY24-25 separate financial statements is submitted as *Exhibit A-4.2.***

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

**Answer:**

**The financial statements in A-4.1 were audited.**

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

**Answer:**

**No, HSG doesn't maintain any different profit centres.**

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

**Answer:**

**The annual accounting period of HSG is from 1 October to 30 September of the following year, but the reporting period is year 2025. So HSG provides the monthly income statement from October 2024 to December 2925 covering the most recent financial period and the period in *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.

**Answer:**

**HSG provides the most recent financial period (from Oct 2024 to Sep 2025) and year 2025 Trial Balance in *Exhibit A-4.6 Trial Balance.***

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

**Answer:**

**HSG provides 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

**Answer:**

**(a) Enquiry receiving.**
- **HSG receives enquiries from the Importer via email or telephone;**

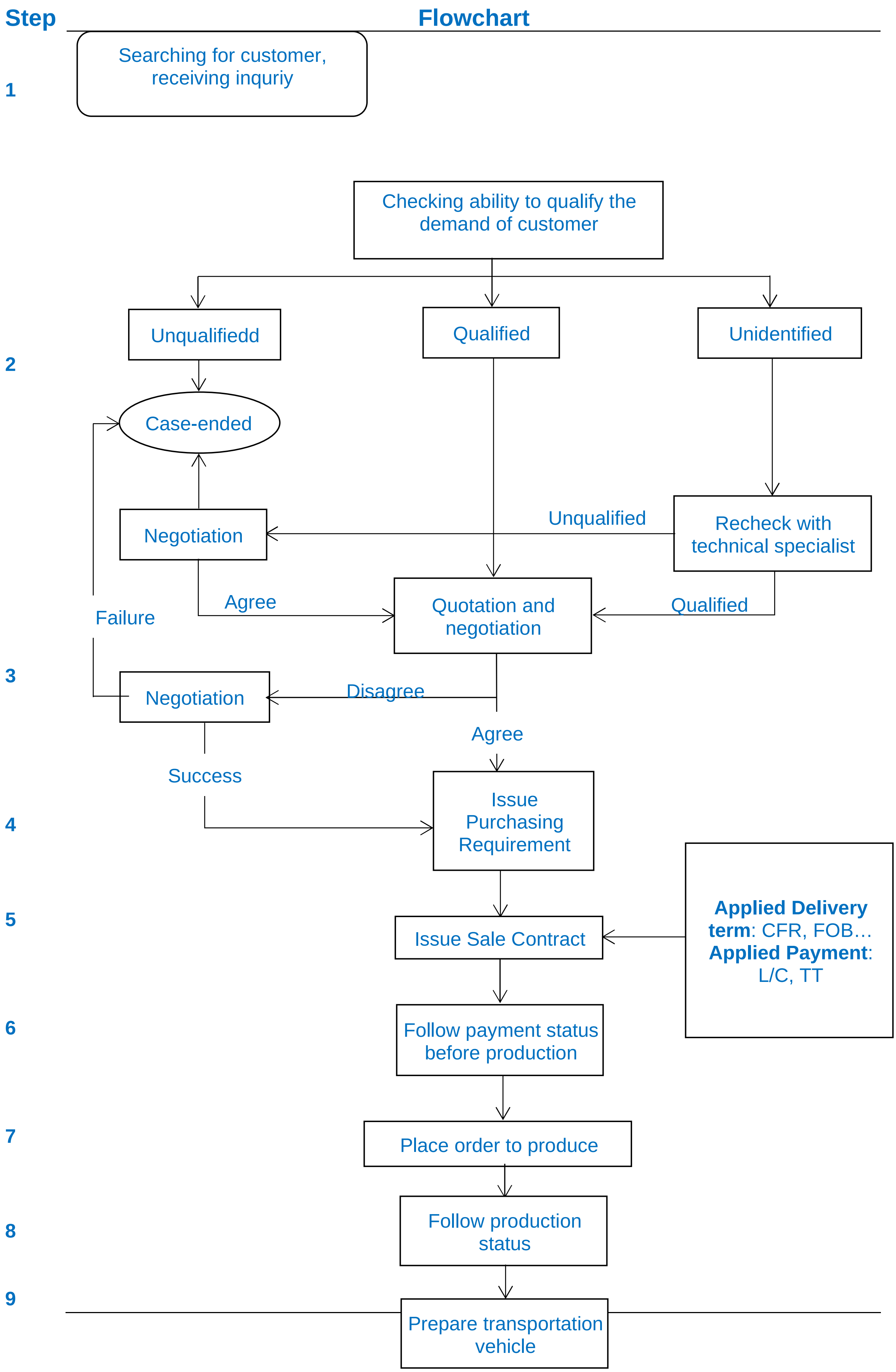
**(b) Negotiation.**
- **HSG matches the Importer's requirements with mill's capability;**
- **HSG sends the offers to the Importer. The Importer bid either be accepted right away or HSG may make counter offers.**
- **Negotiation is concluded by a signed sale contract between HSG and the Importer;**

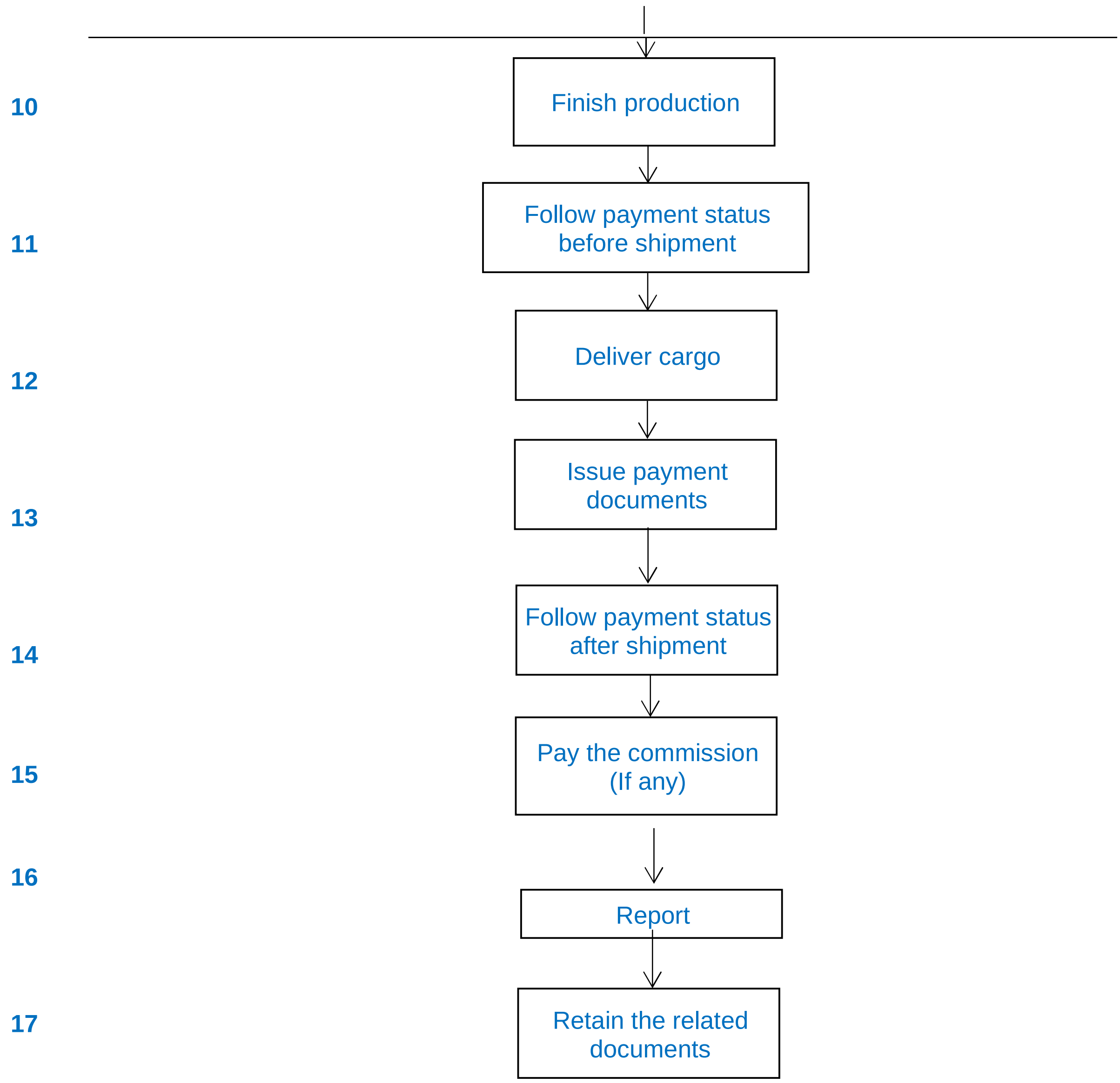
**(c) Payment.**
- **Payment is executed according to relevant terms and conditions in the signed sale contract.**
- **In case [redacted] [payment terms]. The balance will be paid before goods are shipped out.**
- **In case of [redacted] [payment terms].**

**(d) Delivery of Goods**
- **Once the production finishes, HSG will get the booking and ship out the goods**

**(e) After – sale service**
- **In case the Importer raises any claim involving the quality and quantity, HSG will collect information and take necessary steps to determine the damage.**
- **HSG and the buyer will sign the agreement minutes which stipulate the method of claim settlement (compensation, goods return…)**
  **This sales process does not differ between or among classes of customers. HSG apply the same sales process for all export markets.**

**Please refer to the detail flowchart in the following pages:**






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

**Answer:**

**Currency for exported goods to Australia: US Dollars**

**(a) There were [redacted] accounts related to the payment from Australian customers during the POI.**

**Account holder: [redacted]**

**Account number: [redacted]**
**Bank name: [redacted]**

**Account holder: [redacted]**
**Account number: [redacted]**
**Bank name: [redacted]**

**Account holder: [redacted]**
**Account number: [redacted]**
**Bank name: [redacted]**

**(b) [redacted] *[contracted terms]***

**(c) For exported goods, the exchange rate recorded at the rate as on customs declaration. Daily exchange rate announced by [redacted] is applied for accounting record.**

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

**Answer:**

**No, there aren't any customers of the goods exported to Australia related to our company.**

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

**Answer:**

**HSG did not have price list for export sales to Australia. Customer and HSG negotiate specific price for each contract. Therefore, this question is not applicable.**

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

**Answer:**

**As stated above, selling price is determined by negotiation with customers. There is no price difference by distribution channel. Moreover there was [redacted] [distribution channels]**

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

**Answer:**

**HSG does not have any discount or discount policy for foreign customers, but during the price negotiation, the two sides will negotiate until the best price is reached and the invoice price is the final price of the order.**

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

**Answer:**

**HSG did not have issued any credit and debit notes for Australia customers 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.

**Answer:**

**In HSG, the invoice date will be taken to be the date of 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.

**Answer:**

**HSG provides Australian sales listing Excel File in *Exhibit B-2 Australia Sale* with the sample page printout. The Company includes transaction by transaction sales information in Australian sales listing based on the instruction.**

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

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

**Answer:**

**There was no sale exported to Australia through an intermediary.**

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”.

**Answer:**

**HSG provides Australian sales source Excel File in *Exhibit B-2.2 – Source for Australia Sale*.**

## B-3 Sample export documents

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

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

**Answer:**

**Please refer to *Exhibit B-3.1: Sample document for Australia sale* for full set of export sale documents to Australian customer of the subject merchandise during the investigation period. The document set includes: Sales contract, Letter of Credit with payment, Commercial Invoice, Packing list, Bill of lading, Export Declaration, Insurance document and Proof of payment. And HSG provides the expenses supporting documents for sample transactions in Exhibit B-3.1, also.**

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

**Answer:**

**HSG provides a table reconciling the details in the “B-2 Australian sales” listing to the source documents in *Exhibit B-3.2: Reconcile Sale to Document*.**

## B-4 Reconciliation of sales to financial accounts

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

**Answer:**

**HSG provides a table reconciliation of sales to financial accounts in *Exhibit B-4: Upward sales*.**

*2.* Please provide all source documents & worksheets, other than those in A-4, B-2 and D-2, required to complete the “B-4 Upwards sales” worksheet.
   - For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:
     - Sales of the goods under consideration and other sales (e.g. non-goods or services)

  - Domestic, Australian and third country sales of the goods under consideration
- If the documents include spreadsheets, all formulas used must be retained
- There must not be any balancing amounts. All amounts must be supported by source documents.

**Answer:**

**HSG provides all source documents & worksheets for Upward Sales reconciliation (Exhibit B-4) in *Exhibit B-4.2: Source for Upward Sale*.**

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

**Answer:**

**Please refer to *Exhibit B-4: Upward sales*.**

# SECTION C
# EXPORTED GOODS & LIKE GOODS

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

## C-1 Models exported to Australia

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

**Answer:**

**HSG provides the product brochures including goods under consideration (GUC, Zinc coated (galvanised) steel) details in *Exhibit A-2.11*.**
**HSG makes and exports the GUC to Australia matched with Standards of AS 1397. HSG provides the detailed technical description of each stage of the process with the production process in *Exhibit G-1.***
**Hot-dip zinc coated steel (galvanized steel) is a corrosion-resistant steel product manufactured by coating both sides of a steel substrate with a layer of zinc through a hot-dip galvanizing process. The product complies with a wide range of international standards, including ASTM A653/A653M, BS EN 10346, AS 1397, JIS G3302, MS 2385, MS 2384, MS 2660, SNI 07-2053, IS 277, PNS 1990, PNS 67, and TIS 50-2561, enabling its use in diverse global markets and industrial applications.**
**The product is available in base metal thicknesses ranging from 0.13 mm to 3.0 mm, with full coil widths from 762 mm to 1,260 mm and slit widths from 19 mm to 600 mm. Structurally, it consists of a steel base metal protected on both sides by galvanized zinc layers, with an additional surface protection treatment applied to enhance durability and corrosion resistance. The zinc coating contains a minimum zinc purity of 99% and is offered in coating weights ranging from Z80 to Z600, equivalent to 80–600 g/m² on both sides. This coating provides effective protection against corrosion and significantly extends the service life of the steel, particularly in humid or outdoor environments. The surface finish is characterized by a bright, shiny appearance with minimized spangle formation, making it suitable for applications where both functionality and aesthetics are important.**
**To further improve corrosion resistance during storage and transportation, the surface may be treated with Chromium (VI), Chromium (III), or non-chromium passivation compounds. In addition, a thin layer of corrosion-inhibiting oil can be applied when required. Anti-Fingerprint (AFP) treatments are also available, including Regular AFP, Color AFP, and Non-Chromium AFP, which enhance surface appearance and reduce the visibility of fingerprints and handling marks.**
**Due to its excellent corrosion resistance, formability, and durability, hot-dip galvanized steel is widely used in construction, building materials, industrial facilities, infrastructure projects, and home appliance manufacturing. Typical applications include roofing and wall panels, structural framing, HVAC systems, storage racks, ductwork, electrical enclosures, and various industrial components.**
**However, galvanized steel should not be placed in direct contact with certain materials that may accelerate corrosion or cause galvanic reactions. These incompatible materials include copper, lead, unprotected steel, plaster, acidic wood, alkaline substances, and strong acids. Proper material selection and installation practices are therefore important to ensure long-term performance.**

**Overall, hot-dip zinc coated steel provides an optimal combination of corrosion protection, mechanical performance, dimensional flexibility, and aesthetic appearance, making it one of the most widely used coated steel products across construction, industrial, and consumer applications worldwide.**

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

**Answer:**

**HSG submits all MCCs listed in the Australian sales listing in B-2 at *Exhibit C-1-2* and table below.**

| Austrailian Sales MCC (in B-2) | |
|---|---|
| 7-C-Z-P-Y1-3-B-C | 3-C-Z-P-Y2-3-A-C |
| 5-C-Z-P-Y1-3-B-C | 4-C-Z-P-Y1-3-A-C |
| 4-C-Z-P-Y2-1-A-C | 5-C-Z-P-Y4-4-B-C |
| 5-C-Z-P-Y2-1-A-C | 5-C-Z-P-Y1-3-A-C |
| 7-C-Z-P-Y3-4-A-C | 2-C-Z-P-Y1-2-A-C |
| 7-C-Z-P-Y3-4-B-C | 3-C-Z-P-Y1-2-A-C |
| 5-C-Z-P-Y3-4-A-C | 7-C-Z-P-Y3-3-B-C |
| 6-C-Z-P-Y3-4-A-C | 7-C-Z-P-Y3-3-A-C |
| 2-C-Z-P-Y2-3-A-C | 6-C-Z-P-Y3-1-B-C |
| 4-C-Z-P-Y4-4-A-C | 3-C-Z-P-Y1-3-B-S |
| 5-C-Z-P-Y3-4-B-C | 1-C-Z-P-Y1-1-A-C |
| 4-C-Z-P-Y2-3-B-C | 4-C-Z-P-Y4-3-A-C |
| 3-C-Z-P-Y2-3-B-C | 2-C-Z-P-Y1-3-A-C |
| 3-C-Z-P-Y4-3-A-C | 2-C-Z-P-Y1-3-B-C |
| 4-C-Z-P-Y1-3-B-C | 5-C-Z-P-Y4-3-A-C |
| 3-C-Z-P-Y1-3-B-C | 6-C-Z-P-Y4-3-A-C |
| 2-C-Z-P-Y4-2-B-C | 3-C-Z-P-Y1-3-A-C |
| 4-C-Z-P-Y3-3-A-C | 5-C-Z-P-Y1-3-B-S |
| 5-C-Z-P-Y3-3-A-C | 7-C-Z-P-Y2-3-A-C |
| 6-C-Z-P-Y3-3-A-C | 4-C-Z-P-Y3-4-A-C |
| 5-C-Z-P-Y3-4-C-C | 4-C-Z-P-Y4-3-B-C |
| 6-C-Z-P-Y3-4-B-C | 3-C-Z-P-Y4-4-A-C |
| 4-C-Z-P-Y3-4-B-C | 1-C-Z-P-Y4-3-B-C |
| 3-C-Z-P-Y4-3-B-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.

**Answer:**

**HSG provides the detailed description of GUC in question C-1-1 answer.**

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

**Answer:**

**HSG submits the all MCCs listed in the Domestic sales listing in D-2 at *Exhibit C-2-2* and table below.**

| DOMESTIC MCC | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 5-C-Z-P-Y2-2-C-C | 1-C-Z-N-Y5-1-A-C | 5-C-Z-P-Y3-3-B-C | 6-C-Z-P-Y4-3-B-C | 6-C-Z-N-Y1-2-A-C | 6-C-Z-N-Y2-2-B-C | 3-C-Z-P-Y2-3-C-C | 6-C-Z-P-Y2-5-B-C | 6-C-Z-N-Y3-5-C-C |
| 5-C-Z-N-Y1-2-A-C | 5-C-Z-N-Y3-4-A-C | 4-C-Z-N-Y2-3-C-C | 6-C-Z-N-Y1-2-B-C | 5-C-Z-N-Y3-1-C-C | 5-C-Z-N-Y3-1-A-C | 5-C-Z-P-Y4-5-B-C | 7-C-Z-N-Y2-3-A-C | 6-C-Z-P-Y1-4-C-C |
| 4-C-Z-P-Y1-1-C-C | 4-C-Z-N-Y3-1-B-C | 5-C-Z-N-Y3-4-C-C | 5-C-Z-N-Y1-3-C-C | 6-C-Z-P-Y1-3-B-C | 3-C-Z-N-Y3-3-C-C | 3-C-Z-N-Y4-4-B-C | 2-C-Z-N-Y1-1-A-C | |
| 4-C-Z-N-Y1-1-B-C | 7-C-Z-P-Y3-3-B-C | 2-C-Z-N-Y1-3-B-C | 2-C-Z-P-Y2-1-C-C | 6-C-Z-P-Y2-3-B-C | 5-C-Z-P-Y3-1-B-C | 7-C-Z-N-Y4-4-B-C | 4-C-Z-N-Y5-3-A-C | |
| 4-C-Z-P-Y1-1-B-C | 6-C-Z-N-Y3-3-A-C | 3-C-Z-N-Y1-3-B-C | 6-C-Z-N-Y2-3-C-C | 6-C-Z-N-Y3-3-C-C | 2-C-Z-N-Y3-3-B-C | 3-C-Z-N-Y4-3-A-C | 1-C-Z-P-Y4-3-B-C | |
| 5-C-Z-N-Y3-2-C-C | 3-C-Z-N-Y4-2-B-C | 4-C-Z-N-Y5-2-B-C | 7-C-Z-N-Y5-2-B-C | 4-C-Z-N-Y1-1-A-C | 4-C-Z-P-Y5-1-B-C | 4-C-Z-P-Y5-3-C-C | 1-C-Z-N-Y4-3-B-C | |
| 5-C-Z-P-Y3-2-C-C | 6-C-Z-P-Y1-2-C-C | 7-C-Z-P-Y1-3-C-C | 5-C-Z-P-Y3-5-B-C | 6-C-Z-N-Y5-3-B-C | 5-C-Z-N-Y1-1-A-C | 5-C-Z-P-Y3-5-C-C | 2-C-Z-P-Y5-2-A-C | |
| 2-C-Z-N-Y1-1-B-C | 5-C-Z-N-Y2-3-B-C | 1-C-Z-N-Y1-1-C-C | 4-C-Z-N-Y1-3-A-C | 6-C-Z-N-Y2-5-B-C | 4-C-Z-P-Y3-3-C-C | 7-C-Z-P-Y4-4-B-C | 6-C-Z-N-Y1-1-C-C | |
| 2-C-Z-P-Y1-1-C-C | 3-C-Z-N-Y1-1-C-C | 4-C-Z-P-Y5-2-B-C | 2-C-Z-N-Y1-2-A-C | 6-C-Z-N-Y2-4-B-C | 3-C-Z-P-Y5-3-B-C | 2-C-Z-P-Y2-1-B-C | 1-C-Z-P-Y5-1-B-C | |
| 1-C-Z-P-Y1-1-B-C | 3-C-Z-N-Y4-1-B-C | 7-C-Z-N-Y5-3-C-C | 4-C-Z-N-Y2-1-A-C | 3-C-Z-N-Y1-2-C-C | 5-C-Z-N-Y4-3-B-C | 1-C-Z-P-Y5-3-C-C | 6-C-Z-N-Y4-3-C-C | |
| 1-C-Z-N-Y1-1-B-C | 3-C-Z-N-Y1-2-B-C | 7-C-Z-N-Y1-2-B-C | 4-C-Z-N-Y3-2-B-C | 5-C-Z-N-Y4-5-B-C | 3-C-Z-N-Y4-3-B-C | 2-C-Z-N-Y5-1-B-C | 3-C-Z-P-Y4-4-B-C | |
| 3-C-Z-P-Y1-1-C-C | 6-C-Z-N-Y3-2-A-C | 6-C-Z-P-Y1-3-C-C | 6-C-Z-N-Y2-2-C-C | 5-C-Z-N-Y1-1-B-C | 5-C-Z-N-Y5-3-B-C | 5-C-Z-P-Y3-5-A-C | 3-C-Z-N-Y3-2-B-C | |
| 5-C-Z-P-Y1-2-C-C | 2-C-Z-N-Y1-2-B-C | 3-C-Z-P-Y1-1-A-C | 4-C-Z-N-Y4-3-B-C | 6-C-Z-N-Y3-4-B-C | 4-C-Z-P-Y3-1-B-C | 6-C-Z-P-Y3-5-B-C | 7-C-Z-N-Y3-5-A-C | |
| 2-C-Z-P-Y1-1-B-C | 2-C-Z-N-Y2-2-B-C | 6-C-Z-N-Y3-5-B-C | 2-C-Z-N-Y4-2-B-C | 6-C-Z-P-Y2-3-A-C | 5-C-Z-P-Y4-2-B-C | 5-C-Z-P-Y4-3-B-C | 4-C-Z-N-Y4-2-A-C | |
| 3-C-Z-P-Y1-1-B-C | 7-C-Z-N-Y2-4-C-C | 4-C-Z-P-Y3-2-B-C | 3-C-Z-N-Y5-2-C-C | 6-C-Z-N-Y5-3-C-C | 5-C-Z-N-Y3-1-B-C | 2-C-Z-P-Y5-1-C-C | 4-C-Z-N-Y5-3-B-C | |
| 4-C-Z-P-Y3-3-A-C | 4-C-Z-N-Y2-3-B-C | 6-C-Z-P-Y3-2-B-C | 3-C-Z-P-Y1-3-B-C | 5-C-Z-N-Y5-3-C-C | 5-C-Z-P-Y2-3-C-C | 2-C-Z-P-Y5-1-B-C | 3-C-Z-N-Y2-2-C-C | |
| 4-C-Z-P-Y4-3-B-C | 5-C-Z-P-Y3-4-B-C | 7-C-Z-P-Y5-2-C-C | 6-C-Z-N-Y3-4-A-C | 5-C-Z-P-Y5-2-C-C | 4-C-Z-P-Y1-3-A-C | 3-C-Z-N-Y4-3-C-C | 7-C-Z-P-Y1-2-A-C | |
| 4-C-Z-N-Y4-2-B-C | 5-C-Z-P-Y2-3-B-C | 4-C-Z-P-Y2-1-B-C | 4-C-Z-P-Y3-1-C-C | 7-C-Z-N-Y2-3-C-C | 4-C-Z-P-Y3-4-C-C | 4-C-Z-N-Y5-1-B-C | 7-C-Z-P-Y1-5-A-C | |
| 4-C-Z-N-Y1-1-C-C | 7-C-Z-P-Y1-2-C-C | 5-C-Z-N-Y1-2-B-C | 7-C-Z-P-Y2-4-C-C | 6-C-Z-P-Y5-3-C-C | 6-C-Z-P-Y4-2-B-C | 5-C-Z-P-Y3-2-A-C | 6-C-Z-P-Y1-2-A-C | |
| 4-C-Z-N-Y3-4-B-C | 3-C-Z-N-Y4-2-C-C | 5-C-Z-N-Y1-1-C-C | 1-C-Z-N-Y1-2-C-C | 7-C-Z-N-Y2-2-C-C | 2-C-Z-P-Y5-2-C-C | 5-C-Z-N-Y5-1-C-C | 6-C-Z-N-Y2-1-C-C | |
| 5-C-Z-N-Y3-3-B-C | 5-C-Z-N-Y2-2-B-C | 4-C-Z-P-Y3-4-B-C | 6-C-Z-N-Y3-5-A-C | 7-C-Z-N-Y3-3-C-C | 7-C-Z-P-Y3-4-B-C | 4-C-Z-P-Y4-4-B-C | 7-C-Z-P-Y1-3-A-C | |
| 4-C-Z-N-Y3-3-C-C | 6-C-Z-N-Y1-2-C-C | 7-C-Z-N-Y1-3-B-C | 6-C-Z-N-Y2-5-A-C | 4-C-Z-N-Y3-3-A-C | 5-C-Z-N-Y2-4-A-C | 5-C-Z-N-Y2-1-A-C | 5-C-Z-N-Y5-3-A-C | |
| 5-C-Z-N-Y5-2-B-C | 2-C-Z-P-Y2-3-B-C | 5-C-Z-P-Y1-2-B-C | 4-C-Z-N-Y2-3-A-C | 4-C-Z-N-Y4-4-A-C | 2-C-Z-P-Y5-3-C-C | 5-C-Z-N-Y1-3-A-C | 3-C-Z-N-Y1-2-A-C | |
| 1-C-Z-N-Y1-2-B-C | 6-C-Z-P-Y3-2-C-C | 4-C-Z-N-Y2-2-B-C | 5-C-Z-N-Y1-3-B-C | 3-C-Z-N-Y4-4-A-C | 4-C-Z-P-Y2-3-C-C | 5-C-Z-N-Y2-1-C-C | 1-C-Z-N-Y1-1-A-C | |
| 5-C-Z-P-Y3-2-B-C | 7-C-Z-P-Y3-3-C-C | 5-C-Z-N-Y3-2-B-C | 6-C-Z-P-Y3-4-B-C | 7-C-Z-N-Y1-2-C-C | 3-C-Z-P-Y5-2-C-C | 3-C-Z-P-Y3-3-B-C | 6-C-Z-P-Y3-4-A-C | |
| 5-C-Z-N-Y3-3-C-C | 4-C-Z-P-Y1-3-C-C | 5-C-Z-P-Y1-3-B-C | 6-C-Z-N-Y1-3-B-C | 5-C-Z-N-Y2-2-C-C | 2-C-Z-P-Y1-2-C-C | 1-C-Z-P-Y5-2-C-C | 2-C-Z-N-Y5-3-C-C | |
| 2-C-Z-N-Y4-1-B-C | 3-C-Z-P-Y1-3-C-C | 5-C-Z-P-Y3-1-C-C | 6-C-Z-N-Y4-3-B-C | 6-C-Z-N-Y4-3-A-C | 3-C-Z-P-Y1-2-C-C | 7-C-Z-N-Y2-2-B-C | 4-C-Z-P-Y5-3-B-C | |
| 3-C-Z-N-Y1-1-B-C | 4-C-Z-P-Y1-2-C-C | 7-C-Z-N-Y3-3-B-C | 6-C-Z-P-Y1-2-B-C | 3-C-Z-N-Y1-1-A-C | 7-C-Z-N-Y1-5-C-C | 1-C-Z-N-Y5-3-C-C | 4-C-Z-P-Y4-3-A-C | |
| 5-C-Z-P-Y3-3-C-C | 3-C-Z-N-Y2-1-C-C | 4-C-Z-N-Y1-3-C-C | 5-C-Z-P-Y1-1-A-C | 4-C-Z-P-Y2-4-C-C | 7-C-Z-P-Y2-3-C-C | 2-C-Z-P-Y4-1-B-C | 2-C-Z-P-Y4-3-A-C | |
| 5-C-Z-P-Y2-1-C-C | 4-C-Z-P-Y1-1-A-C | 7-C-Z-P-Y2-2-B-C | 5-C-Z-N-Y3-3-A-C | 3-C-Z-P-Y5-3-C-C | 6-C-Z-N-Y1-3-C-C | 3-C-Z-P-Y5-1-B-C | 6-C-Z-P-Y2-5-A-C | |
| 3-C-Z-P-Y5-2-B-C | 7-C-Z-P-Y1-3-B-C | 4-C-Z-P-Y3-3-B-C | 6-C-Z-N-Y2-3-A-C | 5-C-Z-P-Y5-1-C-C | 6-C-Z-N-Y5-2-C-C | 4-C-Z-P-Y4-2-B-C | 7-C-Z-N-Y2-4-A-C | |
| 3-C-Z-P-Y2-1-C-C | 7-C-Z-P-Y5-3-C-C | 1-C-Z-P-Y1-2-B-C | 4-C-Z-N-Y2-1-B-C | 1-C-Z-N-Y5-2-B-C | 7-C-Z-N-Y5-2-C-C | 7-C-Z-P-Y3-2-B-C | 4-C-Z-N-Y3-4-C-C | |
| 5-C-Z-P-Y2-2-B-C | 7-C-Z-P-Y5-3-B-C | 5-C-Z-P-Y2-4-B-C | 2-C-Z-N-Y5-2-B-C | 4-C-Z-P-Y2-1-C-C | 2-C-Z-P-Y2-2-C-C | 5-C-Z-P-Y5-3-A-C | 2-C-Z-N-Y2-1-B-C | |
| 4-C-Z-P-Y2-2-C-C | 4-C-Z-P-Y1-3-B-C | 5-C-Z-N-Y2-4-B-C | 3-C-Z-N-Y5-2-B-C | 7-C-Z-N-Y3-5-B-C | 7-C-Z-N-Y5-3-B-C | 7-C-Z-N-Y1-2-A-C | 3-C-Z-N-Y5-1-C-C | |
| 4-C-Z-P-Y2-3-B-C | 5-C-Z-N-Y3-5-B-C | 5-C-Z-P-Y3-4-C-C | 1-C-Z-N-Y1-3-B-C | 7-C-Z-N-Y3-4-B-C | 5-C-Z-N-Y2-3-C-C | 5-C-Z-P-Y5-3-B-C | 6-C-Z-P-Y4-3-C-C | |
| 2-C-Z-N-Y2-3-B-C | 1-C-Z-P-Y1-1-C-C | 6-C-Z-N-Y2-3-B-C | 7-C-Z-N-Y4-4-C-C | 7-C-Z-N-Y2-3-B-C | 1-C-Z-P-Y2-1-B-C | 3-C-Z-P-Y2-3-B-C | 4-C-Z-N-Y2-4-C-C | |
| 2-C-Z-P-Y1-2-B-C | 7-C-Z-P-Y5-2-B-C | 5-C-Z-N-Y1-2-C-C | 6-C-Z-N-Y3-2-C-C | 3-C-Z-P-Y2-4-B-C | 3-C-Z-P-Y3-2-B-C | 4-C-Z-P-Y1-1-B-S | 2-C-Z-N-Y5-3-B-C | |
| 3-C-Z-P-Y1-2-B-C | 5-C-Z-P-Y5-2-B-C | 5-C-Z-P-Y2-1-B-C | 3-C-Z-N-Y2-2-B-C | 3-C-Z-P-Y2-4-C-C | 6-C-Z-N-Y1-3-A-C | 7-C-Z-N-Y3-4-A-C | 6-C-Z-N-Y4-2-B-C | |
| 4-C-Z-P-Y1-2-B-C | 2-C-Z-N-Y2-1-C-C | 5-C-Z-P-Y4-4-B-C | 2-C-Z-P-Y5-2-B-C | 6-C-Z-P-Y2-2-B-C | 6-C-Z-N-Y2-4-A-C | 2-C-Z-P-Y1-3-C-C | 5-C-Z-N-Y3-5-C-C | |
| 5-C-Z-P-Y1-2-A-C | 2-C-Z-N-Y5-2-C-C | 3-C-Z-P-Y4-1-A-C | 3-C-Z-P-Y2-2-B-C | 6-C-Z-P-Y3-3-A-C | 2-C-Z-N-Y5-1-C-C | 2-C-Z-N-Y1-3-C-C | 4-C-Z-P-Y1-3-B-S | |
| 5-C-Z-N-Y2-1-B-C | 2-C-Z-N-Y1-2-C-C | 4-C-Z-P-Y5-2-C-C | 7-C-Z-P-Y4-4-C-C | 4-C-Z-N-Y4-3-A-C | 6-C-Z-P-Y5-2-C-C | 6-C-Z-N-Y5-3-A-C | 3-C-Z-N-Y5-3-C-C | |
| 3-C-Z-N-Y2-3-B-C | 2-C-Z-P-Y1-3-B-C | 4-C-Z-N-Y1-2-C-C | 5-C-Z-N-Y4-4-B-C | 7-C-Z-N-Y1-3-C-C | 6-C-Z-P-Y5-3-B-C | 3-C-Z-N-Y5-3-B-C | 2-C-Z-P-Y1-2-B-S | |
| 4-C-Z-P-Y2-2-B-C | 4-C-Z-N-Y1-3-B-C | 6-C-Z-N-Y3-2-B-C | 5-C-Z-P-Y5-1-B-C | 3-C-Z-N-Y2-4-B-C | 3-C-Z-P-Y3-1-A-C | 1-C-Z-N-Y2-2-C-C | 3-C-Z-P-Y1-2-B-S | |
| 5-C-Z-P-Y3-3-A-C | 7-C-Z-P-Y1-2-B-C | 5-C-Z-N-Y3-4-B-C | 4-C-Z-N-Y5-2-C-C | 1-C-Z-N-Y5-1-B-C | 3-C-Z-P-Y3-1-C-C | 4-C-Z-P-Y1-4-B-C | 4-C-Z-P-Y1-2-B-S | |
| 4-C-Z-N-Y4-4-B-C | 6-C-Z-P-Y2-3-C-C | 6-C-Z-P-Y3-3-C-C | 1-C-Z-N-Y2-1-B-C | 5-C-Z-N-Y5-1-B-C | 1-C-Z-N-Y5-2-C-C | 6-C-Z-P-Y3-5-A-C | 5-C-Z-P-Y1-2-B-S | |
| 4-C-Z-N-Y2-2-C-C | 5-C-Z-P-Y1-3-C-C | 6-C-Z-P-Y3-3-B-C | 4-C-Z-N-Y5-1-C-C | 1-C-Z-P-Y5-2-B-C | 3-C-Z-P-Y4-2-B-C | 2-C-Z-N-Y1-3-A-C | 2-C-Z-P-Y1-1-A-C | |
| 5-C-Z-P-Y1-1-C-C | 2-C-Z-N-Y4-3-B-C | 6-C-Z-P-Y2-2-C-C | 2-C-Z-P-Y4-2-B-C | 4-C-Z-N-Y3-2-C-C | 3-C-Z-N-Y3-3-B-C | 4-C-Z-N-Y2-1-C-C | 5-C-Z-P-Y1-3-A-C | |
| 2-C-Z-P-Y2-2-B-C | 4-C-Z-N-Y1-2-B-C | 3-C-Z-P-Y2-1-B-C | 6-C-Z-P-Y1-3-A-C | 4-C-Z-P-Y3-2-C-C | 5-C-Z-P-Y2-3-A-C | 6-C-Z-P-Y2-4-B-C | 4-C-Z-N-Y1-3-B-S | |
| 2-C-Z-N-Y1-1-C-C | 3-C-Z-N-Y5-1-B-C | 5-C-Z-P-Y5-3-C-C | 5-C-Z-N-Y5-2-C-C | 3-C-Z-N-Y2-1-B-C | 3-C-Z-N-Y2-2-A-C | 3-C-Z-P-Y4-3-B-C | 2-C-Z-P-Y1-2-A-C | |
| 5-C-Z-P-Y1-1-B-C | 4-C-Z-N-Y3-3-B-C | 6-C-Z-N-Y3-3-B-C | 7-C-Z-P-Y2-3-B-C | 3-C-Z-N-Y2-4-C-C | 5-C-Z-P-Y5-2-A-C | 4-C-Z-N-Y3-1-C-C | 6-C-Z-P-Y2-1-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.

**Answer:**

**During the POI, HSG has used Oracle ERP software with the product code recorded in their accounting system.**

**HSG provides a product coding system in *Exhibit C-3* for all goods under consideration, which is based on the specifications of the product, showing the Grade of product, the coating designation, the level of thickness. This product coding system has been used throughout the responses of HSG where applicable. HSG generated MCC based on the company's normal**

**product coding information. *Exhibit C-3* included the MCC creation method by the product coding system and product standards.**

**In *Exhibit C-3*, coding explanation, HSG has also provided a list of all subject merchandise grades that are sold in domestic market and Australian market.**

# SECTION D
# DOMESTIC SALES

## D-1 Domestic sales process

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

**ANSWER:**

**HSG applied the same sales negotiation process to all classes of customers without discrimination between related customers and unrelated customers.**

**(1). Receiving enquiries:**
**Hoa Sen Group receives enquiries via email, telephone or meeting with customers.**

**(2). Checking availability:**
**Salesman checks stock or the availability of materials and production capacity.**

**(3). Price negotiation:**
**Hoa Sen Group offers prices to customers. Both parties will negotiate to get a final price.**

**(4). Negotiation & confirmation:**
**Depends on sales term, Hoa Sen Group and customers negotiate in order to reach agreements.**

**(5). Payment and delivery:**

**1). For sale to Retailer and End-user, the sales are delivered at sight and paid at sight**

**2). For sale to distributor/wholesaler with large quantity purchase, the delivery is determined for each purchase order, whether HSG delivers to customer or customer receives the goods by their own trucks at HSG's warehouse**

**With distributors with frequent purchase, HSG will require them to provide bank promissory note for payment. The credit period granted is from 15 to 30 days, after that the bank will pay HSG. Therefore, there is no late payment**

**3). For sale to related parties, HSG will make a debt balancing note at the end of month.**

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

**Answer:**

**HSG have sold the goods to related customer. See *Exhibits D-1.2 - List of Related customers***

**HSG applies a consistent sales process across all customer classes, without any distinction between related and unrelated parties.**

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

**Answer:**

**HSG did not have any official price list. Price is negotiated and finalized for each transaction. Therefore, this question is not applicable.**

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

**Answer:**

**As stated above, selling price is determined by negotiation with customers. There is no price difference by distribution channel.**

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

**Answer:**

**HSG [redacted]**

**However, [redacted]:**
**(i) [redacted]; and**
**(ii) [redacted].**

**Such [redacted].**

**[Confidential terms of sale].**

**All discounts applicable to the subject goods have been reported in the "On-invoice discounts" field in Exhibit D-2. And HSG submits the sample discount invoice in *Exhibit D-1.5.***

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

**Answer:**

**The credit or debit notes may be issued on a discount basis like question D1-5. HSG has reported such amount "On-invoice discounts" in the domestic sales listing and submitted sample supporting documents in Exhibit D-1.5.**

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.

**Answer:**

**The date that the invoice was created has been reported as the date of sale for HSG's domestic sales during the review period.**

## 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.

**Answer:**

**HSG provides Domestic sales listing Excel File in *Exhibit D-2 Domestic Sale* with the sample page printout. The Company includes transaction by transaction sales information in Domestic sales listing based on the instruction.**

***Note:*** **HSG has included additional columns for bank charges, domestic insurance and credit expense, where applicable, to ensure that all relevant direct expenses are fully reported.**

**The cost of credit has been calculated using the methodology described in response to question E-1, and the applied average credit period is set out in Exhibit E-1.**

[redacted]**. The worksheet supporting the calculation and allocation of** [redacted] **has been submitted as *Exhibit D-2.2.2*.]**

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

**Answer:**

**HSG provides domestic sales source Excel File in *Exhibit D-2.2 – Source for Domestic Sale*.**

## 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.*

**Answer:**

**Please refer to *Exhibit D-3.1: Sample document for Domestic sale* for full set of domestic sale documents to domestic customer of GUI during the investigation period.**
**The document set includes: general concept agreement, VAT invoice, delivery receipt and Proof of payment.**

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

**Answer:**

**Annotations have been added to the documents in Exhibit D-3.1 and a table reconciling the details in the “D-2 Domestic sales” listing to the source documents in D-3.1 is provided 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.

**Answer:**

**HSG provides a table reconciliation of sales to financial accounts in *Exhibit B-4: Upward sales*.**

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

**Answer:**

**HSG provides a table reconciliation of sales to financial accounts in *Exhibit B-4: Upward sales*.**

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

**Answer:**

**HSG provides a table reconciliation of sales to financial accounts in *Exhibit B-4: Upward sales*.**

# 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:

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

**Answer:**

**HSG provides a table the average credit period calculation in *Exhibit E-1.1: Calculation of average credit period for each customer*.**

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

**Answer:**

**HSG has had short term borrowing in local currency. HSG provides the details in *Exhibit E-1.2: Interest rate for short-term borrowings in local currency.***

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

**Answer:**

**HSG has had interest earning deposits. HSG provides the supporting document for interest rate for the deposit of the bank that. Please see *Exhibit E-1.3: Interest rate for earning deposits in local currency.***

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?

**Answer:**

**HSG has had short term borrowing in USD. HSG provides the details in *Exhibit E-1.4: Interest rate for short-term borrowings in USD.***

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

**Answer:**

**No, HSG does not have earning deposit or cash products in USD.**

## E-2 Packaging

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

**ANSWER:**

**HSG produces GUI in continuous GI/GL line or slitting line and take the packaging in the relevant lines. HSG can gather the packing expenses in the facilities. There is no difference between domestic and export packing methods. The Company can report the packing expense per ton based on quarter. HSG provides the unit packing cost calculation in *Exhibit E-2.1.***

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

**Answer:**

**The export packaging follows the same standard procedures as our domestic packaging.**

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

**Answer:**

**As stated above, there is no differences between our domestic and export sales.**

## E-3 Delivery

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

**Answer:**

**HSG has allocated the inland freight cost based on the value of each transaction over total revenue of domestic sale**

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

**Answer:**

**The good under investigation was exported to Australia under [redacted], [redacted] and [redacted] terms during the POI.**

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

**Answer:**

**The actual inland freight was reported based on the invoiced amount. The inland freight expense for each line item was allocated by dividing the total container freight charges by the respective weight of the goods.**

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

**Answer:**

**Handling charges were also reported based on the actual amounts from the invoices and were allocated to the related products in proportion to their weight.**

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

**Answer:**

**Sales under [redacted] and [redacted] terms include Ocean Freight.**
**In B-2, calculated ocean freight cost based on actual exporting document, invoices of ocean freight.**

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

**Answer:**

**Sales under [redacted] terms include Marine Insurance.**
**In B-2, calculated marine insurance cost based on actual exporting document, invoices of marine insurance.**

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

**Answer:**

**Since [redacted].**

## E-4 Other direct selling expenses

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

**Answer:**

**HSG [redacted], details as following:**

- [redacted]
- [redacted]

**[Confidential terms of sale]**

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

**Answer:**

**There are some differences in tax liability between domestic and export sales.**

- **As for VAT tax, VAT for domestic sale is 10%, and there is no VAT for exported good.**
- **In HSG records, VAT is recorded separately with the value of good. Recorded revenue has not included VAT**
- [redacted]
- [redacted]

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

**Answer:**

**HSG have some direct selling expense as following:**

1. [redacted]
2. [redacted].

**All these above expenses are allocated as in *<u>Exhibit D-2.2.1 Domestic sale</u>***

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

**Answer:**

**HSG have some direct selling expense for the export to Australia as following:**

1. [redacted].
2. **Other costs: This expense includes miscellaneous fees [redacted] at port and so on.**

**All these above expenses are reported in *<u>Exhibit B-2 Australia sale</u>***

## 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.

**Answer:**

**Not applicable.**

[3] Available on the commission website

# SECTION F
# THIRD COUNTRY SALES

## F-1 Third country sales process

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

**Answer:**

**The sale process described in B-1.1 uses for all market in all countries.**

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

**Answer:**

**HSG does not have related customer in third country for investigated product.**

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

**Answer:**

**The invoice date will be taken to be the date of sale**

## F-2 Third country sales listing

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

**Answer:**

**HSG provides Third country sales listing Excel File in *Exhibit F-2 Third country Sale* with the sample page printout. The Company includes transaction by transaction sales information in Third country sales listing based on the instruction. HSG submits the shipping term relevant unknit expense calculation worksheet in *Exhibit F-2.2.1 Unit Expense* based on Australian market sales database.**

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

**Answer:**

**HSG provides Third country sales source Excel File in *Exhibit F-2.2 – third country sales source*.**

## F-3 Differences in sales to third countries

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

**Answer:**

**There are no differences in sales to third countries and to Australia.**

# SECTION G
# COST TO MAKE AND SELL

## G-1 Production process

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

   **Answer:**

   **HSG provided a flowchart of the production process with the description for each process in *Exhibit G-1.***

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

   **Answer:**

   **HSG provided the details of HSG and the related companies' production and service as follows.**

   **HSG: HSG is equipped with NOF lines for producing galvanized steel (GUI) and galvalume steel, as well as color coating lines for producing pre-painted steel.**

   **Hoa Sen Nghe An (HSNA) Plant: HSNA is equipped with rust removal lines / pickling lines for producing hot-rolled coils (HRC) pickled, cold rolling lines for producing cold-rolled coils (CRC), NOF lines for producing galvanized steel (PUI) and galvalume steel, as well as color coating lines for producing pre-painted steel. HSG purchased the PUI from HSNA rather than tolling and sold the PUI.**

   **Hoa Sen Nhon Hoi (HSNH) Plant: HSNH is equipped with rust removal lines / pickling lines for producing HRC pickled, cold rolling lines for producing CRC, NOF lines for producing galvanized steel (PUI) and galvalume steel, as well as color coating lines for producing pre-painted steel. HSG purchased the PUI from HSNH rather than tolling and sold the PUI.**

   **Hoa Sen Phu My One Member Limited Liabilities Company (HSPM): HSPM does not produce GI (PUI) from start to finish. HSPM is only involved in slitting the GI (PUI) products manufactured by HSG under a tolling agreement.**

## G-2 Cost accounting practices

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

   **Answer:**

   **HSG's cost accounting system based on actual costs.**

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

   **Answer:**

   **HSG's cost accounting system based on actual costs.**

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

   **Answer:**

   **HSG's ERP-based accounting system includes a cost module that monitors manufacturing expenses across all production activities. At the end of each month, the system identifies and compiles detailed production costs for every product code manufactured during that period. These figures are captured in the monthly cost report, [redacted], which can be extracted directly from the ERP system. The report breaks down costs into major components such as raw materials, labour, and manufacturing overhead.**
   **Under HSG's normal cost accounting system, product-specific costs are calculated to reflect each item's specifications, product size (thickness and width), type of coating material, and coating mass. The company also maintains a cost calculation statement [redacted], which enables tracking of the types and quantities of materials used for each production order.**
   **HSG assigns production orders for each stage of its manufacturing process. For example, the NOF process, which uses cold-rolled steel coils to produce goods, the chemical coating process applied to finished products, and the slitting process all operate under their own distinct production orders. Raw materials are costed based on their actual input cost, while conversion costs—such as labour and other manufacturing overhead—are allocated using appropriate allocation bases to reflect the actual costs incurred.**

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

   **Answer:**

   **HSG provided a list of cost centres in the cost accounting system with the description and allocation methodology for each cost centre in *Exhibit G-2*.**

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

   **Answer:**

   **HSG's product coding system is designed to reflect the detailed specifications of each manufactured and sold product. The product codes are fully integrated into HSG's ERP system and are directly linked to both the sales and cost accounting system. HSG calculates detailed costs by individual product code.**
   **The main characteristics that impact the production cost and selling price of the product include factors such as steel grade, product size (thickness and width), type of coating material, and coating mass.**
   **All these characteristics are embedded in the product coding system.**

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

   **Answer:**

   **HSG has no costs for management accounting purposes.**

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

   **Answer:**

**HSG has no engagement in any start-up operation.**

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

   **Answer:**

   **HSG applies [redacted] to determine the value of raw materials, work in progress, and finished goods in inventory.**

   **Specifically, the system determines [redacted] as the average unit cost of each item code in each warehouse for each month, and this is also the unit cost used as the cost of goods sold when inventory is issued.**

   **The [redacted] unit cost is calculated based on [redacted].**

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

   **Answer:**

   **At HSG, inventory value is determined by Item code and is not separately determined by specific quality grades such as [redacted], [redacted], or [redacted].**

   **Specifically, a single Item code may include multiple lots. These lots may consist of [redacted]. In this context, [redacted] are considered sub-standard goods. [redacted] are goods originally intended for export but, after inspection, were found not to meet the requirements for export. However, as long as these lots belong to the same Item code, the accounting system records and values them under that same Item code.**

   **Accordingly, the value of damaged or sub-standard goods generated during the production process is not determined using a separate valuation method for each quality grade. Instead, these goods are recorded at the average unit cost of the relevant Item code under the monthly weighted average method applied by HSG.**

   **In other words, for goods under the same Item code, whether they are [redacted], the system applies the same accounting unit cost for recording inventory value and cost of goods sold when inventory is issued. The distinction among [redacted] is mainly for quality management and sales purposes, and does not result in a separate accounting valuation method.**

   **For [redacted], because these goods do not meet the standards for [redacted] or are not eligible for export, they are usually sold through a bidding process. However, this sales method only affects the actual selling price in the market and does not change the principle for recording inventory value in the accounting system.**

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

   **Answer:**

   **At HSG, for sub-standard products, scrap, and other recovered items generated during the production process, the company records their initial value based on [redacted] that are issued in advance and updated in the ERP system for each Item code. The basis for this is an [redacted] applicable to each type of recovered sub-standard product, scrap, and waste. This [redacted] sets out the specific unit price for each corresponding Item code and serves as the basis for the system to record the value of these recovered items when they arise.**

**Specifically, when sub-standard products, scrap, or recovered waste arise during production, the actual quantity generated is recorded in the system through the production order. Based on the actual quantity recorded and the unit price [redacted], the system determines the value of the recovered portion.**

**The value of recovered sub-standard products, scrap, or waste is recorded as a reduction in the production cost of the main product. In other words, at the time they arise, these recovered items are not valued under a separate allocation method such as a joint product costing method, but are recorded directly based on the internal unit price established for each Item code.**

**After initial recognition, these recovered sub-standard products, scrap, or waste continue to be tracked in the system as separate inventory items. If additional transactions relating to the same Item code arise, such as purchases or stock transfers, the system will continue to value that Item under the monthly weighted average method applied by HSG for inventory.**

**If the company issues [redacted]. The [redacted] currently in effect is provided in *Exhibit G-2.10*.**

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

**Answer:**

**HSG is the parent company of the group and therefore is not charged any management fees or corporate allocations by a parent company. In addition, HSG is not charged any management fees, corporate service fees, or corporate overhead allocations by any related company. HSG records only the expenses actually incurred for its own operations based on its own accounting books and supporting documents.**

## G-3 Cost to make on domestic market

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

**Answer:**

**HSG provided the worksheet in *Exhibit G-3 Domestic CTM*. And the surrogate domestic CTM list is reported in *Exhibit G-3.1*.**

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

**Answer:**

**HSG provided the worksheet and supporting materials in *Exhibit G-3.2 domestic CTM source*.**

## G-4 Selling, General & Administrative expenses

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

   **Answer:**

   **HSG provided the worksheet in *Exhibit G-4.1 SG&A listing*.**

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

   **Answer:**

   **HSG provided the worksheet in *Exhibit G-4.2 Domestic SG&A calculation*.**

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

   **Answer:**

   **HSG provided the worksheet and supporting materials in *Exhibit G-4.3 Upwards SG&A*.**

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

   **Answer:**

   **HSG provided the relevant general ledgers(the detailed listings) of all SG&A accounts in Exhibit G-4.1 SG&A listing, also.**

## G-5 Cost to make the goods exported to Australia

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

    **Answer:**

    **HSG provided the worksheet in *Exhibit G-5 Australian CTM*. And the surrogate Australia CTM list is reported in *Exhibit G-5.1*.**

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

    **Answer:**

    **HSG provided the worksheet and supporting materials in *Exhibit G-5.2 Australian CTM source*.**

## G-6 Cost allocation method

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

    **Answer:**

    **HSG's ERP-based accounting system includes a cost module that tracks manufacturing expenses across all production activities. At the end of each month, the system identifies and compiles detailed production costs for every product code manufactured during that period. These figures are captured in the monthly cost report, [redacted], which can be extracted directly from the ERP system. The report breaks down costs into major components such as raw materials, labour, and manufacturing overheads.**
    **HSG's product coding system is designed to reflect the detailed specifications of each manufactured and sold product. The product codes are fully integrated into the ERP system and are directly linked to both the sales and cost accounting modules. As a result, HSG can calculate detailed costs at the individual product-code level.**
    **Key characteristics that influence the production cost and selling price of the product include steel grade, product dimensions (thickness and width), type of coating material, and coating mass. All these characteristics are embedded within the product coding structure.**
    **Accordingly, HSG used the [redacted] report to classify the Goods produced during the Period by product code. Each product code identified as the Goods was then assigned an MCC as defined in this questionnaire. The production month was also used to determine the corresponding quarter.**
    **The [redacted] report specifies the account codes recorded in the accounting system that correspond to each cost element. Based on these account codes, cost items (raw**

**materials, other materials, labour, and manufacturing overheads) were categorized as shown below. Packing costs were categorized by cost centres, including "DONGGOI." Using this method, HSG aggregated costs by MCC, by quarter, and by cost element through the [redacted] report.**
**For MCCs identified based on domestic sales during the Period, the quarterly aggregated results were reported in Exhibit G-3 Domestic CTM. For MCCs identified based on sales to Australia, the quarterly aggregated results were reported in Exhibit G-5 Australian CTM. HSG's cost accounting system does not distinguish whether the produced goods were sold domestically or exported to Australia. Therefore, if an MCC was sold both domestically and exported to Australia, the same MCC appears in both CTM files.**

**Account Code Classification Table**

| Account Code | Account Name | Classification |
|---|---|---|
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |

**(a) Raw material**

**Raw material cost = raw material cost – scrap value**

**Scrap cost generated during the production can be distinguishable by the specific field in the [redacted] report. ( Phế liệu : Scrap )**

**(b) Other material**

**All other material costs are recorded at account [redacted] in the accounting system. For each product, the [redacted] report provides a detailed explanation of how direct labour, raw materials, manufacturing overheads, and other production costs are allocated to that product.**

**(c) Direct labour**

**All direct labour costs at factory are recorded at account [redacted] in the accounting system. For each product, the [redacted] report provides a detailed explanation of how direct labour, raw materials, manufacturing overheads, and other production costs are allocated to that product.**

**(d) Manufacturing overheads**

**All factory overhead costs at factory are recorded at account [redacted] in the accounting system. For each product, the [redacted] report provides a detailed explanation of how direct labour, raw materials, manufacturing overheads, and other production costs are allocated to that product.**

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

**Answer:**

**HSG provided the worksheet, prepared using the [redacted] report, to calculate the reported CTM for MCC [redacted], which had the largest production volume over the**

**period, in *Exhibit G-6*. OPM077 does not separately identify prime and non-prime products, as the classification is made only after the production process has been completed. So the sample MCC does not include prime/non-prime code.**

## G-7 Major raw material costs

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

   **Answer:**

   **HSG used Hot-rolled steel coil as the major raw material.**
   **HSG produced the goods from hot-rolled steel coils supplied by its subsidiary [redacted]. HSG provided the cost of cold-rolled steel coils produced by HSS in *Exhibit G-7.2 Raw material CTM*.**

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

   **Answer:**

   **HSG used Hot-rolled steel coil as the major raw material.**
   **HSG produced the goods from hot-rolled steel coils supplied by its subsidiary [redacted]. HSG provided the cost of cold-rolled steel coils produced by [redacted] in *Exhibit G-7.2 Raw material CTM*.**

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

   **Answer:**

   **HSG provided the worksheet showing the weighted average percentage of each raw material cost as a proportion of total cost to make in *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.

   **Answer:**

   **The only material which individually account for 10% or more of the total cost to make is [redacted]. HSG provided the worksheet in *Exhibit 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.

**Answer:**

**HSG used the purchase report [redacted], which is generated within HSG's ERP system, to prepare the 'Exhibit G-7.4 Raw material purchases' listing. All information required for the 'Exhibit G-7.4 Raw material purchases' listing can be verified through this report. HSG provided the AP042 report format 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.

**Answer:**

**HSG provided the sample documentations and reconciliation to 'Exhibit G-7.4 Raw material purchases' listing in *Exhibit G-7.6.1 and G-7.6.2*.**

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.

**Answer:**

**HSG produced the goods from cold-rolled steel coils supplied by its subsidiary [redacted]. HSG provided the pricing policy between HSG and its affiliates including HSS in *Exhibit G-7.7*.**

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

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

**Answer:**

**HSG provided the worksheet in *Exhibit G-8 Upwards costs*. HSG purchased the GUI from its affiliated companies and subsidiaries (including HSNA and HSNH). So HSG reports the purchased GUI cost included in the cost to make. The Exhibit G-8 included the purchased GUI cost amount and volume details, also. HSG submits the sample GUI purchase documents included in Exhibit G-8.**

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

**Answer:**

**HSG provided the supporting materials from Exhibit G-8-1 to G-8-10 with the reference numbers in *Exhibit G-8 Upwards costs*.**

3. For any amount that is hard coded (i.e. not a formula), please cross-reference by providing:

- the name of the source document, including the relevant page number, in column D of the worksheet and
- highlight or annotate the amount shown in the source document and
- provide the account number and sub-account number (if applicable) at column E of the worksheet.

**Answer:**

**HSG provided the supporting materials from Exhibit G-8-1 to G-8-10 with the reference numbers in *Exhibit 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.

   **Answer:**

   **As explained in our response to Question G-6.1, HSG aggregates production/purchase quantities and production/purchase costs by product code through the [redacted] generated from its cost accounting system. Using this report, HSG captured the production quantities reported in the worksheets "G-3 Domestic CTM" and "G-5 Australian CTM."**

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

   **Answer:**

   **As explained in our response to Question G-6.1, HSG aggregates production/purchase quantities and production/purchase costs by product code through the [redacted] generated from its cost accounting system. Using this report, HSG captured the production quantities reported in the worksheets "G-3 Domestic CTM" and "G-5 Australian CTM."**

3. Briefly explain the reasons for any differences between:

   (a) the production quantities reported at worksheet "G-3 domestic CTM" and the sales volumes reported at worksheet "D-2 domestic sales" and
   (b) the production quantities reported at worksheet "G-5 Australian CTM" and the sales volumes reported at worksheet "B-2 Australian sales".

   **Answer:**

   **The production/purchase quantities reported in worksheet "G-3 Domestic CTM" do not match the sales volumes reported in worksheet "D-2 Domestic Sales" because production/purchase and sales occur at different points in time. Goods produced during the period may be sold in a later period, and goods sold domestically during the period may include inventory produced in prior periods. As a result, production quantities and sales volumes cannot be identical for the same period.**
   **Similarly, the production/purchase quantities reported in worksheet "G-5 Australian CTM" differ from the sales volumes reported in worksheet "B-2 Australian Sales" because export sales may include goods produced in earlier periods, while goods produced during the period may not yet have been exported. Timing differences between production and export shipments naturally create discrepancies between production/purchase quantities and sales volumes.**

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

**Answer:**

**The production volume for the goods is primarily determined through HSG's monthly production planning process. The Production Planning Department reviews domestic and export sales forecasts, confirmed customer orders, inventory levels, and available production capacity. Based on this information, the department establishes the monthly production volume for each product group. This plan is then approved by management and communicated to the production units.**
**The product mix is determined by analysing customer order requirements, market trends, and the technical capabilities of HSG's production lines. Factors such as steel grade, thickness, width, coating type, and coating mass influence the product mix. The product mix is adjusted to optimize production efficiency while meeting customer specifications and delivery schedules.**
**Production volume for the goods is determined monthly, with adjustments made as needed based on actual sales and operational conditions.**
**Product mix is reviewed and adjusted weekly or even daily, depending on customer order changes and production scheduling requirements.**

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

**Answer:**

**The lead time required for HSG to adjust its production volumes depends on the production planning cycle and the operational characteristics of its manufacturing lines. In general, HSG determines production volumes on a monthly basis, and any adjustment to production quantities typically requires one full production-planning cycle.**
**For significant changes in production volume, HSG generally requires approximately one month to adjust its production schedule. This lead time reflects the need to review customer orders, raw material availability, production capacity, and existing production commitments.**
**Minor adjustments within the month may be made on a limited basis; however, large-scale changes to production volumes cannot be implemented immediately due to technical constraints, production sequencing requirements, and the continuous-flow nature of steel manufacturing.**

## 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.

**Answer:**

**HSG provided the worksheet *in Exhibit G-10 Capacity Utilisation*.**

**It should be noted that it is difficult to specify or quantify production capacity for each individual process. HSG's operations involve multiple interconnected production processes, and capacity cannot be meaningfully defined on a standalone basis for each process line.**
**The only lines that physically manufacture the goods are the NOF lines, and HSG operates [redacted] NOF lines in total. The production volumes reported by HSG include not only the products manufactured directly on these NOF lines, but also the volumes of products that are subsequently slit, chemically coated, or produced through outsourced toll-manufacturing arrangements.**
**Because post-processing activities are performed on products already produced by the NOF lines, it is not feasible to calculate a meaningful production capacity for these downstream processes. Similarly, it is not possible to quantify capacity for outsourced**

**production, as those volumes are manufactured using facilities that are not owned or controlled by HSG.**
**For this reason, the capacity figures reported in Exhibit G-10 reflect only the capacity of the NOF lines, as this is the only portion of the production process for which capacity can be reliably quantified. Since capacity utilisation is calculated by comparing this NOF-based capacity against total reported production—including post-processing volumes and outsourced volumes—it is inevitable that the utilisation rate exceeds 100 percent.**

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

   **Answer:**

   **For HSG, production capacity is determined based on the capacity of the four NOF lines used to manufacture the goods under investigation. The capacity of each NOF line is determined based on the relevant technical documents or technical contracts, and the total production capacity is calculated as the sum of the capacities of all [redacted] NOF lines.**

| No | Name of the NOF production line | Capacity (MT/year) |
|---|---|---|
| | | |
| Total | | |

   **Please see the *Exhibit G-10 Capacity Utilisation* for the calculation of capacity utilisation. As noted earlier, HSG's reported production volume includes not only the products manufactured directly on HSG's NOF lines, but also the volumes that undergo additional processing such as slitting and chemical coating, as well as the volumes produced through outsourced manufacturing. However, production capacity can be identified only for HSG's NOF lines. Therefore, when capacity utilisation is calculated by comparing NOF-line capacity against total production—including post-processing and outsourced volumes—the resulting utilisation rate inevitably exceeds 100 percent.**

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?

   **Answer:**

   **HSG currently has a warehouse at [redacted] for storing semi-finished goods and finished goods. The storage capacity of this warehouse is approximately [redacted] metric tons for finished goods and approximately [redacted] metric tons for semi-finished goods. The total storage capacity for both finished goods and semi-finished goods is approximately [redacted] to [redacted] metric tons.**

   (b) What was the monthly amount of inventory maintained during the investigation period?

   **Answer:**

   **During the investigation period, the monthly inventory maintained was generally at a level close to the actual storage capacity of the warehouses. Specifically, for the warehouse at [redacted], the monthly inventory maintained was usually around [redacted] to [redacted] metric tons, including approximately [redacted] metric tons of finished goods and approximately [redacted] metric tons of semi-finished goods.**

   (c) What is the average period of time that inventory is retained (describe how this is calculated)?

**Answer:**

**For export sales, HSG mainly produces based on customer orders. Therefore, after production is completed, the goods are usually stored only for a short period while awaiting vessel arrangement and shipment, typically around [redacted].**
**For domestic sales, the inventory retention period is normally around [redacted].**
**Accordingly, the inventory retention period is determined based on the actual movement of goods from the date they are completed and entered into inventory to the date they are issued from inventory for delivery to customers.**

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.

   **Answer:**

   **There have been no material changes to the type of capital equipment or technology utilised by HSG in the manufacture of the goods during the last five years. The goods under investigation have continued to be manufactured using the same NOF line technology throughout this period. Any maintenance, repairs, replacement of spare parts, or routine servicing carried out during this period were part of normal operations and did not result in any change to the underlying production technology or manufacturing process.**

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.

   **Answer:**

   **HSG produced the goods from cold-rolled steel coils supplied by its subsidiary [redacted]. [redacted] operates [redacted] production facilities (Cold-rolling process lines) capable of manufacturing cold-rolled steel coils. The total actual production capacity of these lines is approximately [redacted] MT per year, and this figure was explicitly calculated by the manufacturer based on the assumption of regular, scheduled downtime for maintenance. The date on which these production lines came into operation is as following table, and there has been no change in their production capacity over the past five years**

| No | Name of the cold rolling production line | Capacity (MT/year) | The date that production facility came into operation |
|---|---|---|---|
| | | | |
| | Total | | |

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.

   **Answer:**

   **There have been no significant investments in the past five years to upgrade, refurbish, or build any of the plants used in the production of the goods. As previously explained, there have been no material changes to the type of capital equipment or production technology utilised by HSG during this period. The goods under investigation have continued to be manufactured using the same NOF line technology, and no modifications have been made that would affect the underlying production process or capacity.**

**Any maintenance, repairs, replacement of spare parts, or routine servicing conducted over the past five years were part of normal operational activities and do not constitute significant investments**

HOA SEN GROUP

OFFICIAL: PUBLIC VERSION

# EXPORTER'S DECLARATION

I hereby declare that Hoa Sen Group (company) 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** : **Vu Van Thanh**

M.S.D.N: 3700381324 C.T.C.P CÔNG TY CỔ PHẦN TẬP ĐOÀN HOA SEN P. DĨ AN - TP. HỒ CHÍ MINH

**Signature** :..........................................................................

**Position in Company** : **Chief Executive Officer**

**Date** : **25/07/2026**