Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: AR 708

Product: Steel reinforcing bar

From: Indonesia

Investigation period: 1 April 2025 to 31 March 2026 (the period)

Response due by: 3 August 2026

Email enquiries to: investigations3@adcommission.gov.au

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

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

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting an accelerated review of steel corner beads & angles (the goods) exported to Australia from Indonesia

The commission will use the information you provide to determine normal values and export prices over the review period (the period). This information will determine whether steel corner beads and angles are dumped. The commission will also use this information to determine whether steel corner beads and angles has been in receipt of countervailable subsidies over the period.

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

If you do not manufacture the goods

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

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

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the commission to verify the information, we may deem your company to be an uncooperative exporter. In that case the commission must determine a dumping margin and/or a subsidy 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 submission. Where the public record version of your response to the exporter questionnaire does not contain sufficient detail, your company may be requested to resubmit your response with the required level of detail or, if deadlines have passed, the commission may not have regard to it.

Verification of the information that you supply

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

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

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

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

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

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

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

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

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

Important instructions for preparing your response

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

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

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

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

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

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

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

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

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

CHECKLIST

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

Section	Please tick if you have responded to all questions
Section A Company information	☐
Section B Export sales to Australia	☐
Section C Exported goods & like goods	☐
Does your company use product codes or stock keeping unit (SKU) codes? Yes 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. Please refer to Exhibit C-3 - Product Code description. We have used the product description to identify the relevant product, grade, diameter and length. Section D Domestic sales	☐
Section E Due allowance	☐
Section F Third country sales	☐
Section G Cost to make and sell	☐
Section J Domestic Market	☐
Section K Australian Market	☐
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 Dom SG&A calculation	☐
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 / GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

> *Hot-rolled deformed steel reinforcing bar whether or not in coil form, commonly identified as rebar or debar, in various diameters up to and including 50 millimetres, containing indentations, ribs, grooves or other deformations produced during the rolling process.*
>
> Further information
> The goods include all steel reinforcing bar meeting the above description regardless of the particular grade, alloy content or coating.
>
> Exclusions
> Goods excluded from the measures are plain round bar, stainless steel and reinforcing mesh.

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	Prime	Prime	P	Mandatory	Optional
		Non-Prime	N		
2	Minimum yield strength specified by product standard (Mega Pascals or “MPa”)	Less than or equal to 300	A	Mandatory	Mandatory
		Greater than 300 but less than or equal to 480	B		
		Greater than 480 but less than 550	C		
		Equal to or greater than 550	D		
3	Finished form	Rebar in length/straight	S	Mandatory	Mandatory
		Rebar in coil	C		
4	Nominal diameter (millimetres or “mm”)	Less than 12	A	Mandatory	Optional
		Greater than or equal to 12 and less than or equal to 16	B		
		Greater than 16 and less than or equal to 32	C		
		Greater than 32 and less than or equal to 50	D		
5	Length (metres or “m”)	Less than or equal to 6	1	Mandatory	Optional
		Greater than 6 and less than or equal to 12	2		
		Greater than 12	3		

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
		Coil product	C		
6	Deformation pattern along Length	Threaded	T	Mandatory	Optional
		Non-Threaded	N		

In constructing an MCC, use a '-' between each category. For example: P-A-S-B-1-N

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: Tri
   Position in the company: GM Finance
   Telephone: 082250171530
   E-mail address: tri@themastersteel.com

2. If you have appointed a representative, provide their contact details:
   Name: John Bracic
   Address:PO Box 3749, Manuka 2603
   Telephone: +61 (0)499 056 729
   E-mail address:john@jbracic.com.au

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

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

4. Please provide the location of the where your company's production records are held.
   Jakarta and Surabaya, Indonesia

5. Please provide the location of your company's production plant manufacturing the goods under consideration.
   Jakarta and Surabaya, Indonesia

A-2 Company information

1. What is the legal name of your business?
   PT The Master Steel Manufactory

2. Does your company trade under a different name and/or brand? If yes, provide details.
   No

3. Was your company ever known by a different legal and/or trading name? If yes, provide details
   No

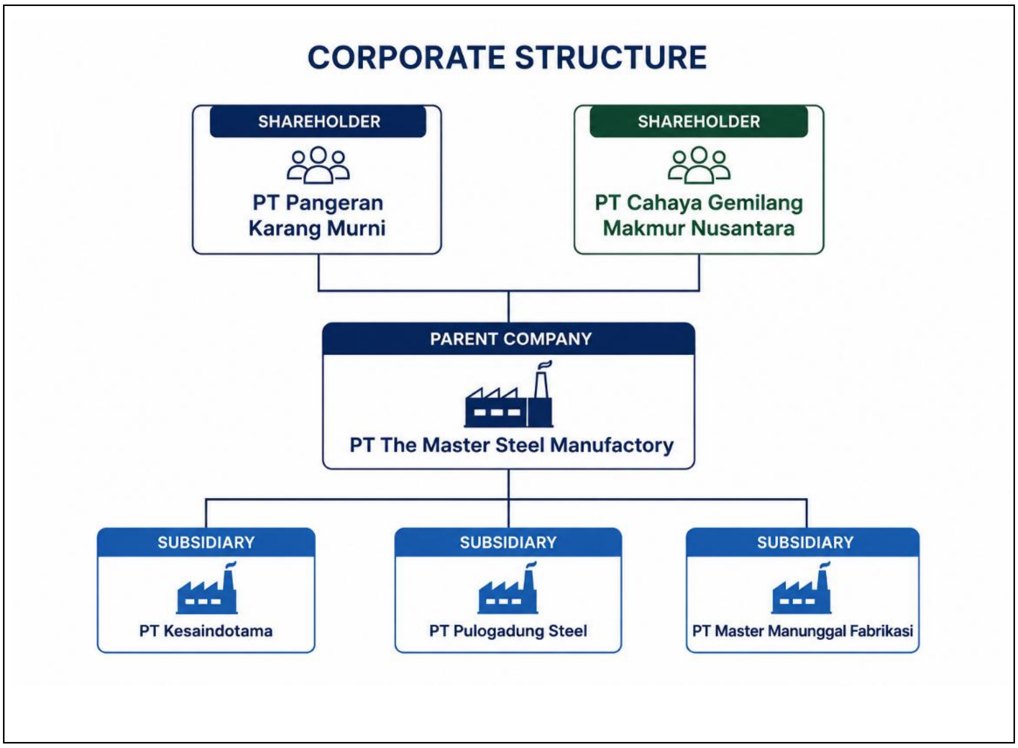
4. Provide a list of your current board of directors and any changes in the last two years.

Pada tanggal 31 Desember 2025 dan 2024, susunan Dewan Komisaris dan Direksi Perusahaan adalah sebagai berikut:

As of December 31, 2025 and 2024, the Company's Board of Commissioners and Directors are as follows:

Dewan Komisaris		*Board of Commissioners*
Presiden Komisaris	Diah Soemedi	*President Commissioner*
Komisaris	Herman Soemedi	*Commissioner*
Direksi		*Board of Directors*
Direktur Utama	Istanto Burhan	*President Director*
Direktur	Ismail Mandry	*Director*
Direktur	Leslie Soemedi	*Director*
Direktur	Nevin Soemedi	*Director*

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
- PT Pangeran Karang Murni operates as holding company
- PT Cahaya Gemilang Makmur Nusantara operates as holding company
- PT Kesaindotama operates as real estate company
- PT Pulogadung Steel operates as steel manufacture company
- PT Master Manunggal Fabrikasi operates as rebar fabrication company

6. Is your company or parent company publicly listed? No
If yes, please provide:
(a) The stock exchange where it is listed and
(b) Any principle shareholders[1]
If no, please provide:
(a) A list of all principal shareholders and the shareholding percentages.
- PT Pangeran Karang Murni [redacted]%
- PT Cahaya Gemilang Makmur Nusantara [redacted] %

7. What is the overall nature of your company's business? Include details of the products that your company manufactures and sells and the market your company sells into.
The nature of the company's business is steel manufacturing company. Our products are:
Rebar (8mm-50mm) - Indonesia
Wire Rod (5.5mm-20mm) – Indonesia, Japan, Malaysia, Australia, Belgium
Wire Mesh (M4-M12) - Indonesia

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: Not Applicable
(a) produce or manufacture
(b) sell in the domestic market
(c) export to Australia and
(d) export to countries other than Australia.

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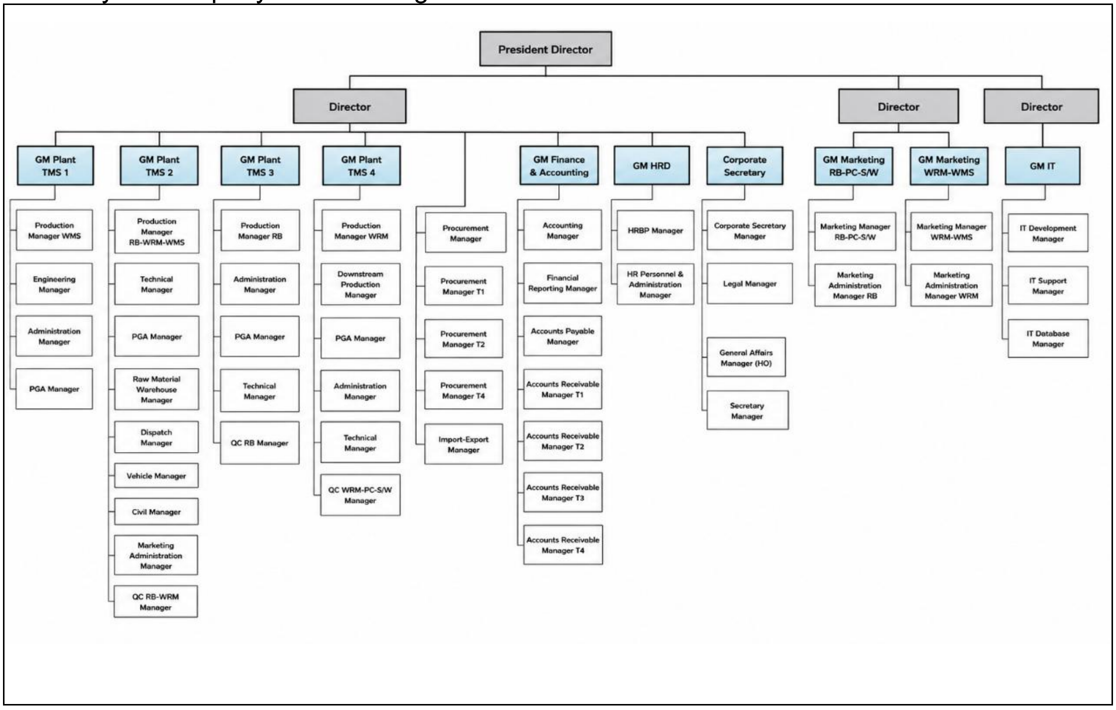
[1] Principal shareholders are those who are able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company.

9. Provide your company's internal organisation chart.



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

Group / Department	Functions
President Director	Provides overall leadership, defines corporate strategy, and oversees the company's overall performance and governance.
Directors	Supervise their respective business functions, implement corporate strategies, and ensure operational objectives are achieved.
Plant Operations (GM Plant TMS 1–4)	Manage manufacturing operations, production planning, maintenance, engineering, quality control, warehouse management, and continuous process improvement to ensure efficient and safe production.
Procurement	Responsible for sourcing raw materials, spare parts, and services, supplier management, purchasing activities, and import-export coordination to support business operations.
Finance & Accounting	Manage financial reporting, accounting, accounts payable, accounts receivable, budgeting, cash management, taxation, and financial compliance.
Human Resources (HRD)	Manage recruitment, employee development, performance management, compensation and benefits, industrial relations, and HR administration.
Corporate Secretary & Legal	Handle corporate governance, legal matters, regulatory compliance, company documentation, corporate communications, and general administrative support.
Marketing (RB-S/W)	Develop marketing strategies, manage customer relationships, support sales activities, and coordinate marketing administration for Reinforcing Bar (RB), and Steel Wire (S/W) products.
Marketing (WRM-WMS)	Responsible for marketing activities, customer management, and sales administration for Wire Rod Mill (WRM) and Wire Mesh Steel (WMS) products.
Information Technology (IT)	Manage the company's information systems, software development, IT infrastructure, database management, cybersecurity, and technical support to ensure reliable business operations.

11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.
Refer to Exhibit A-9.11 - MS Catalogue

A-3 General accounting information

1. What is your financial accounting period?
   January - December

2. Are your financial accounts audited? If yes, who is the auditor?
   Yes. It is audited by KAP Suharli, Sugiharto dan Rekan (ShineWing Indonesia)

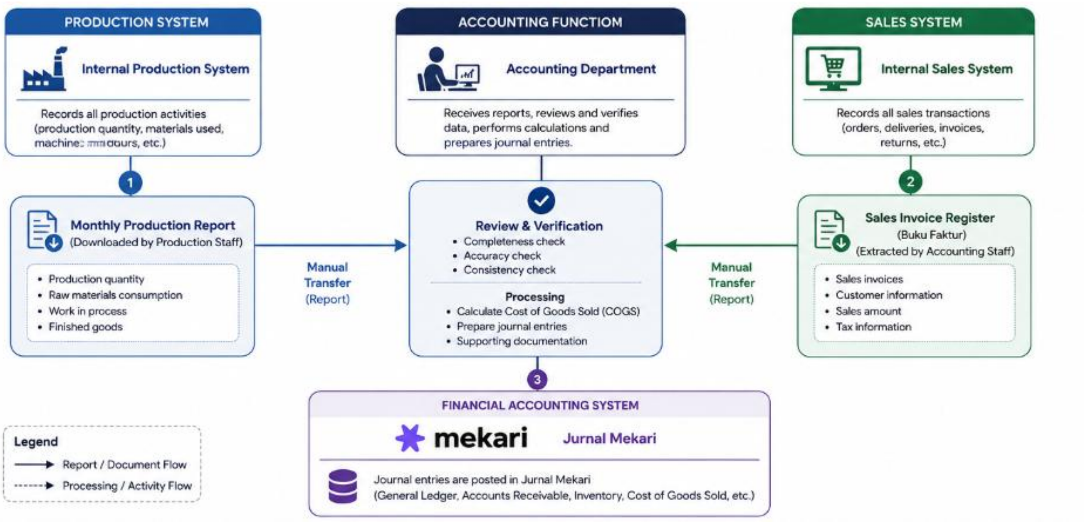
3. What currency are your accounts kept in?
   Indonesian Rupiah

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

5. What is the name of your sales system?
   Internal system

6. What is the name of your production system?
   Internal system

7. If your financial accounting, sales and production systems are different, how do the systems interact? Is it electronically or manual? Please provide a detailed explanation and include diagrams.
   The Company uses separate systems for Financial Accounting, Sales, and Production. These systems are not directly integrated. Data is transferred through manually generated reports and subsequently recorded in the accounting system. All reports transferred between systems are reviewed and verified by the Accounting Department before journal entries are posted to ensure the accuracy, completeness, and consistency of financial records.



8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.
   No

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.
   No

A-4 Financial Documents

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

Please refer to Exhibit A-4.1 - Financial Report PT The Master Steel Manufactory 2025, which includes information for both 2024 and 2025 financial accounting periods.

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.
   Please refer to Exhibit A-4.1 - Financial Report PT The Master Steel Manufactory 2025, which includes information for both 2024 and 2025 financial accounting periods.

3. If the financial statements in A-4.1 are unaudited, provide for each company: Not Applicable
   (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.

4. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods falls into for:
   (a) the most recent financial year and
   (b) the period.
   No

5. If the period is different to your financial period, please provide:
   (a) Income statements directly from your accounting information system covering the most recent financial period and the period or
   (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.
   Please refer to Exhibit A-4.5 - Profit_loss_01-04-2025_31-03-2026, and Exhibit A-4.5 - Profit_loss_01-01-2026_31-03-2026.

6. Please provide a copy of your company's trial balance (in Excel) covering the period and the most recent financial year. (attachment)
   Please refer to Exhibit A-4.6 - Trial_balance_01-04-2025_31-03-2026

7. Please provide your company's chart of accounts (in Excel).
   Please refer to Exhibit A-4.7 - ChartOfAccounts

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

SECTION B
EXPORT SALES TO AUSTRALIA

(Not applicable)

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

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?

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.

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

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.

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.

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.

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

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.
    - 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.

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

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.

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.

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.

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

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

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. Not applicable

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.

   Not applicable

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.

Product classes and grades

Indonesian rebar is designated by surface type plus minimum yield strength in MPa:
- BjTP (Baja Tulangan Polos) — plain/round smooth bar: BjTP 280
- BjTS (Baja Tulangan Sirip/Ulir) — deformed/ribbed bar: BjTS 280, BjTS 420, BjTS 520, BjTS 550, BjTS 690

Mechanical properties

Grade	Yield strength (MPa)	Tensile strength (MPa)	Elongation (min %)	Bend test
BjTP 280	280 min – 405 max	≥ 350	11–12*	180°
BjTS 280	280 min – 405 max	≥ 350	11–12*	180°
BjTS 420 (ex-420B)	420 min – 545 max	≥ 525	10–14*	180°/90°**
BjTS 520	520 min – 645 max	≥ 650	6–7*	180°/90°**
BjTS 550	550 min – 675 max	≥ 687.5	6–7*	180°/90°**
BjTS 690 (ex-700)	690 min	≥ ~805	6–10*	180°/90°**

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.

Domestic MCC
P-B-S-A-2-N
P-B-S-B-2-N
P-B-S-C-2-N
P-B-S-D-2-N
P-C-S-A-2-N
P-C-S-B-2-N
P-C-S-C-2-N
P-C-S-D-2-N
P-D-S-D-2-N

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

   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:

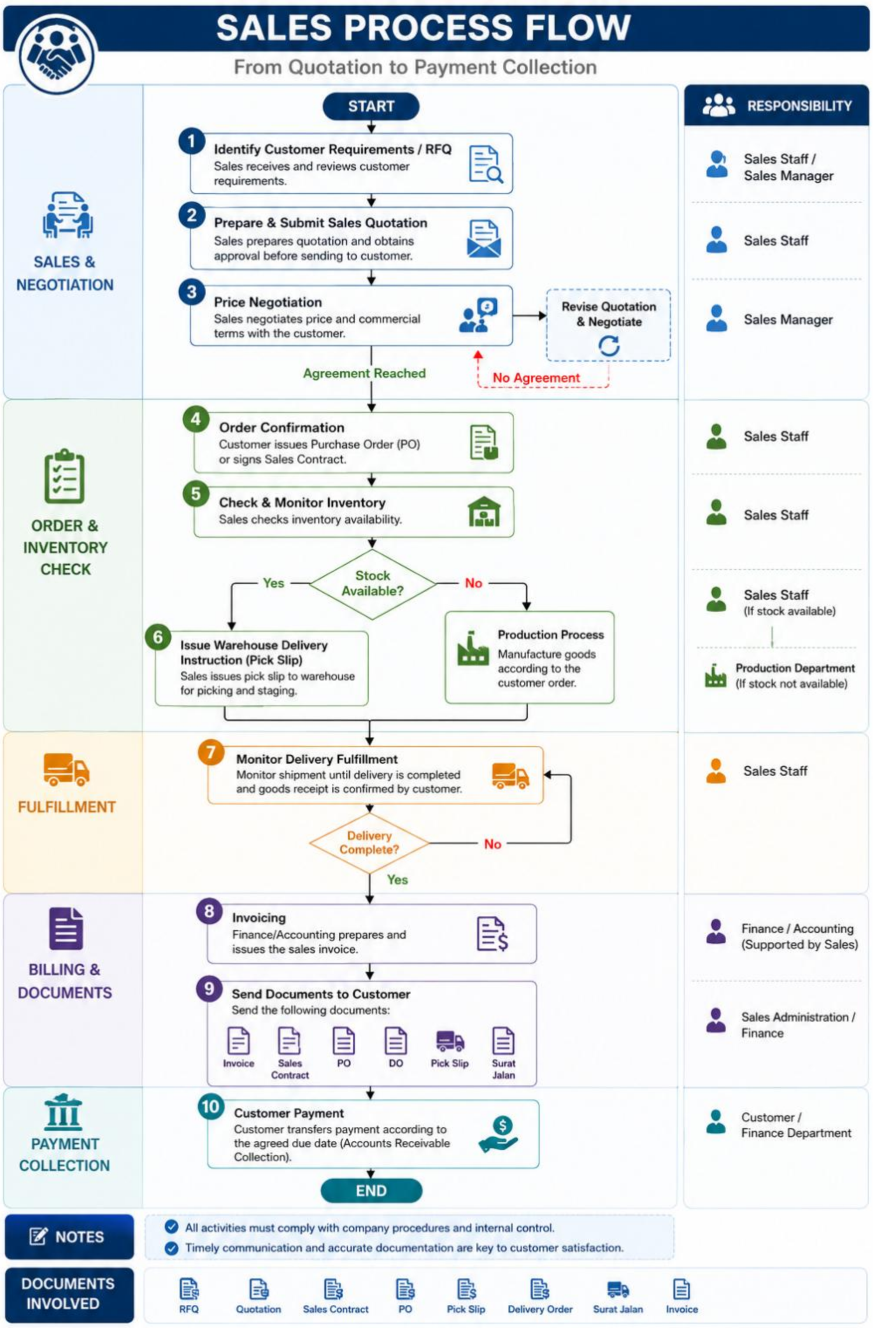
   (b) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.

   Please refer to Exhibit C-3 - Product Code description. We have used the product description to identify the relevant product, grade, diameter and length.

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



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.
   [redacted] – prevailing current market prices

3. If sales are in accordance with price lists or price extras list, provide copies of these lists.
   Prices are concluded with negotiations on day to day basis, no price list is published.

4. Do your domestic selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.
   No, the price is decided on the spot according to the inquiry and there are no distinct differences in the prices for different customers.

5. Did you provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the customer to obtain the discount and/or rebate.
   No.

6. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the like goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.
   No.

7. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:
   (a) What date are you claiming as the date of sale? Date of dispatch / date of invoice (both are same)

   (b) Why does this date best reflect the material terms of sale? You would need to substantively address: Not Applicable
      - 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.

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.

Refer to D-2 – Domestic sales listing.

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”.
   Refer to D-2.2 – Domestic sales source.

D-3 Sample domestic sales documents

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

If the documents are not in English, please provide a translation of the documents.
   Please refer to Exhibit D-3 - Sample Domestic Sales Docs.

2. For each document, please annotate the documents or provide a table reconciling the details in the “D-2 Domestic sales” listing to the source documents in D-3.1.
   Please refer to Exhibit D-3 - Sample Domestic Sales Docs.

D-4 Reconciliation of sales to financial accounts

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

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

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

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

SECTION E
DUE ALLOWANCE

E-1 Credit expense

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

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

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

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

   Not Applicable

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

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?
   No

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?
   Yes, [redacted] %

   (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?
   No

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?
   Bundled with Tie Wire

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

3. If there are distinct differences in packaging between your domestic and export sales: No
   (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

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?

Using trucking from transportation companies

2. What are the delivery terms of the export sales of the goods to Australia?
   Not Applicable

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?
   Not Applicable

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?
   Not Applicable

5. If the delivery terms of the Australian sales includes ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2?
   Not Applicable

6. If the delivery terms of the Australian sales includes marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2?
   Not Applicable

7. If the delivery terms of the Australian sales includes delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?
   Not Applicable

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.
   Domestic commission has been reported in D-2 sales listing. It relates to Commission paid to [redacted].

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? 11%
   - How is VAT accounted for in your records in relation to sales of the goods and like goods? Calculated on actual invoice value
   - Do you receive a VAT refund in relation to sales of the goods and/or like goods? No
   - Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods? No

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

   No

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

   Not Applicable

E-5 Other adjustment claims

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.
   - An adjustment will only be made where there is evidence that the difference affects price comparability.

   No

- Refer to Chapter 15 of the *Dumping and Subsidy Manual (December 2021)*[2] for more information.

[2] Available on the commission website

SECTION F
THIRD COUNTRY SALES

Not Applicable

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.

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.

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.

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.

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".

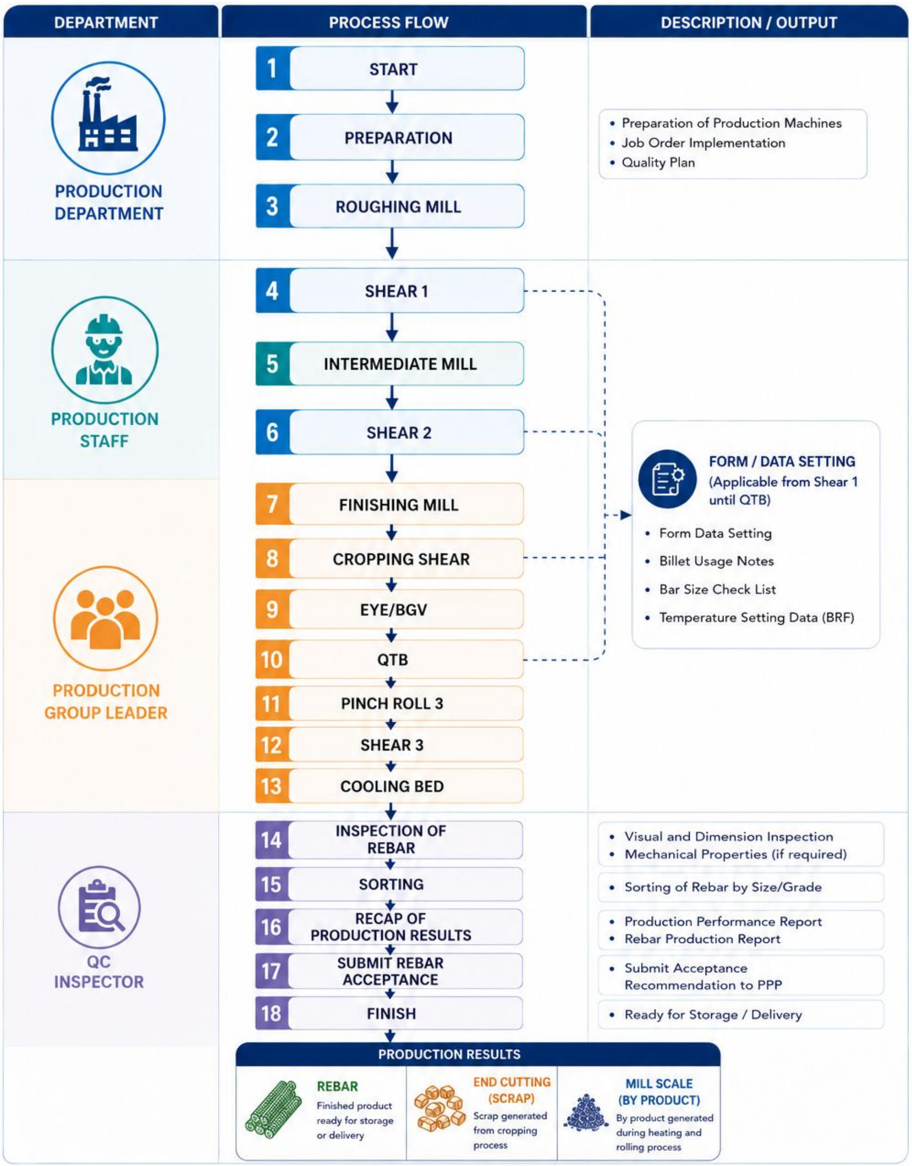
F-3 Differences in sales to third countries

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

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.



2. Are any of your suppliers related to your company (regardless of whether it is relevant to the manufacture of the goods)? If yes, please provide details including the product or services supplied by the related company.
   No

G-2. Cost accounting practices

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

2. If your company uses standard costs: Not Applicable

(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.

3. Briefly explain your cost accounting practices (e.g. job costing, process costing).
The costing calculation consists of three main cost components: Raw Material Cost, Direct Labor Cost, and Manufacturing Overhead Cost.

1. Raw Material Cost

The raw material cost is calculated based on the quantity of billets consumed during the production process. The calculation also considers by-products generated during rolling, such as Mill Scale and Cobble, which are deducted from the raw material cost according to their recoverable values. The resulting amount represents the net raw material cost allocated to rebar production.

2. Direct Labour Cost

Direct labour cost consists of salaries and wages paid to production personnel directly involved in the manufacturing process. These costs are allocated to the production output for the period and form part of the total manufacturing cost.

3. Manufacturing Overhead Cost

Manufacturing overhead includes all indirect production costs incurred during the manufacturing process. These costs typically consist of:

- Electricity
- Gas
- Water
- Stores and Consumable Materials
- Repair and Maintenance
- Factory Expenses
- Depreciation

Each overhead cost is accumulated and allocated to the production output based on the total quantity of finished goods produced during the period.

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.
All cost is allocated to each plant individually

5. To what level of product specificity (models, grades etc.) does your company's cost accounting system normally record production costs?
Not recorded specifically for each grade/size.

6. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.
No

7. Has your company engaged in any start-up operations in relation to the goods? If yes: No
(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.

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)?
Weighted average

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

What are the valuation methods for scrap, by products, or joint products?
Scrap as per current month weighted average price.
By product – as per achievable selling price.
Joint products – Not Applicable

10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details.
No

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.

   Refer to G-3 – Domestic CTM

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

   Refer to 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.

   Refer to 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.

   Refer to G-4.3 Upwards SG&A.

G-5 Cost to make the goods exported to Australia Not Applicable

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.

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".

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 By percentage
   (b) Labour By percentage
   (c) Manufacturing overheads By percentage

   Please refer to Exhibit G-6 - Cost Allocation Method per Model for details of allocation method.

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.
   Please refer to Exhibit G-6 - Cost Allocation Method per Model

G-7 Major raw material costs

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

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. Not Applicable
   - This worksheet lists the quarterly cost to make the raw material manufactured within the period.
   - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
   - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
   - You must provide this list in electronic format using the template provided.

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

3. Using the domestic cost data in “G-3 Domestic CTM” (use “G-5 Australian CTM” if you have no domestic production of like goods), calculate the weighted average percentage of each raw material cost (listed in G-7.1) as a proportion of total cost to make.
   Not Applicable

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

   Please refer to 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.

6. For each raw material:
   (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.
   Please refer to Exhibit G-7.6 - Major Raw Material Purchase Sampling.

   (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.

   Please note that the billet purchase listing in G-7.4 includes all billets purchased and used in the production of debar products, whilst the company’s full billet purchase listing includes billet purchased and used in the production of wire rod. The billet for debar products are identified by the specification, which is “[redacted]”. Specification “[redacted]” is used for wire rod production, and specification “[redacted]” and “[redacted]” is used for plain bar production.

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

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.

2. Please provide any documents, other than those in A-4, G-3 and G-5, required to complete the “G-8 Upwards costs” worksheet.
   Already attach in excel sheet G-8

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.

   Already attach in excel sheet G-8

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.

```
Rebar Production Completed
          |
          ▼
Bundle Weighing
(Automatic Weight Capture)
          |
          ▼
Image Acquisition
(Industrial Camera)
          |
          ▼
Automatic Bundle Counting
(AI Vision System)
          |
          ▼
Production Data Recording
(Weight & Quantity)
          |
          ▼
Automatic Label Printing
          |
          ▼
Label Attachment
          |
          ▼
Finished Product Ready
for Storage / Dispatch
```

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.

```
Production Completed
        |
        ▼
Production Data Recorded
(Internal Production System)
        |
        ▼
Production Report Exported
(Microsoft Excel)
        |
        ▼
Production Report Submitted
to Accounting
        |
        ▼
Manual Data Entry
into Costing Worksheet
```

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
   The differences between goods produced and goods sold are reflected in the inventory movement of finished goods.
   (b) the production quantities reported at worksheet “G-5 Australian CTM” and the sales volumes reported at worksheet “B-2 Australian sales”.
   Not Applicable

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?
   Depending on market demand at our expected selling prices, accordingly the product mix and quantity is decided on monthly basis.

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

G-10 Capacity Utilisation

1. Please complete the worksheet named “G-10 Capacity Utilisation”.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

   Refer to G-10 Capacity Utilisation

2. Explain how the production capacity and capacity utilisation has been calculated.
   The production capacity is calculated based on the installed machine capacity and the manufacturing facilities available at the plant.

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?
   [redacted] ton
   (b) What was the monthly amount of inventory maintained during the review period?
   [redacted] ton
   (c) What is the average period of time that inventory is retained (describe how this is calculated)?
   [redacted]

4. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.
   No

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.
   No

6. List any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.
   No

SECTION J
DOMESTIC MARKET

J-1 Prevailing conditions of competition in the domestic market

1. Describe the domestic market for the goods and the prevailing conditions of competition within the market, including:
   (a) Provide an overall description of the domestic market which explains its main characteristics and trends over the past five years
   The domestic market size for rebars is approximately 12 million tons per annum which is majorly catered by PT Dexin Steel Indonesia, PT The Master Steel Manufactory, and PT Lautan Steel Indonesia, etc. Demand has been increasing at a rate of 4% – 6% per annum since last five years.

   (b) Provide the sources of demand for the goods in the domestic market, including the categories of customers, users or consumers of the product
   . Private contractors
   i. Government projects and infrastructure
   ii. Foreign direct investments
   iii. Data centres

   (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b)
   . Private contractors approximately 30%
   i. Government projects and infrastructure approximately 20%
   ii. Foreign direct investments and data centres approximately 50%

   (d) Describe the factors that influence consumption/demand variability in the domestic market, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production
   Overall demand in domestic markets is normal growth, not much effected by different factors, however the government regulations and investments usually lead to change in demand for a given period.

   (e) Describe any market segmentations in the domestic market; such as geographic or product segmentations
   Rebar products are categorized in 2 segments:
   - Spiral rebar
   - Plain bar

   (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e)
   Rebar products are categorized in 2 segments:
   - Spiral rebar 90-95%
   - Plain bar 5-10%

   (g) Describe the way in which domestically produced goods and imported goods compete in the domestic market
   No, there are no imports happening in Indonesia for Rebar. Hence, there is no competition with import.

   (h) Describe the ways that the goods are marketed and distributed in the domestic market and
   The goods are sold majority in direct sales approximately 80% and balance 20% is sales happening to traders and distributors.

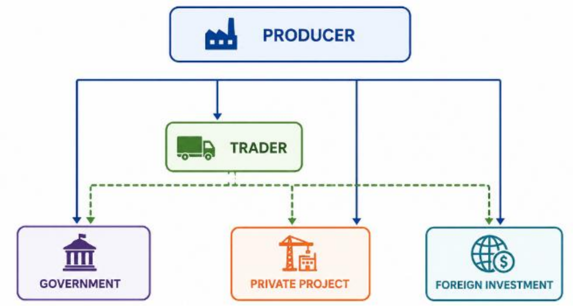
   (i) Describe any other factors that are relevant to characteristics or influences on the domestic market for the goods.

Majority of the market is credit-based sales. If mill wants to sell in cash, then usually need to go through traders in the market.

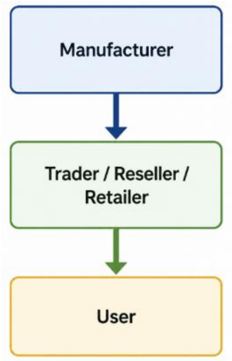
Provide documentary evidence to support the responses made to questions 1(a) to (i).

There is no official or published data available for above information. Above information is submitted by best of our knowledge.

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



3. Describe the commercially significant market participants in the domestic market for the goods at each level of trade over the investigation period. Include in your description:
   - names of the participants
     Manufacturer, trader/reseller/retailer, user
   - the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.)



   - a description of the degree of integration (either vertical or horizontal) for each market participant and
     There is no integration in the market all sales happens independently and all users and traders are unrelated party.

- an estimation of the market share of each participant.

Level with Approximate Market Share	
Manufacturer	
PT Dexin Steel Indonesia	6%
PT The Master Steel Manufactory	5%
PT Lautan Steel Indonesia	5%
PT Inter World Steel Mills Indonesia	2%
PT Bhirawa Steel	2%
Trader	
PT Inti Sumber Baja Sakti	5%
PT ITG Metal Indonesia	5%
PT Hanwa Indonesia	3%
PT Jaya Glassindo Abadi	3%

4. Identify the names of commercially significant importers in the domestic market for the goods over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the domestic market, if known.
   There are no imports of rebars in Indonesia hence there is no category of importer.

5. Describe the regulatory framework of the domestic market for the goods as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.
   For competition policy: KPPU (Komisi Pengawas Persaingan Usaha)
   For taxation: VAT is applicable to all domestic sales
   Product standard: SNI is mandatory for all rebar sales
   (Please look at attachment with file name SNI BTB TMS)

6. Describe any entry restrictions for new participants into the domestic market for the goods. Your response could include information on:
   - resource ownership - No
   - patents and copyrights - No
   - licenses – SNI and company certificates
   - barriers to entry – Capital investment is big as this is a capital-intensive industry
   - import restrictions and – No import license is given by The Ministry of Trade for this product and hence there is no import in the country
   - government regulations (including the effect of those government regulations).
     No

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

J-2 Goods in the domestic market

1. Generally describe the range of goods offered for sale in the domestic market. The description should include all like goods, including those produced by your company. Your description could include information about:
   - quality differences
     SNI and non SNI products
   - price differences
     As per individual company brand
   - supply/availability differences
     Yes, availability influences the price
   - technical support differences

Yes, provided by the company
- the prevalence of private labels/customer brands
  No
- the prevalence of generic or plain labels
  No
- the prevalence of premium labels and
  No
- product segmentation.
  No

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

3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the domestic market. Rank these preferences or purchasing influencers in order of importance.
   Availability of the stock
   Quality and brand of the product
   Price
   Terms of payment (cash / credit)

4. Identify if there are any commercially significant market substitutes in the domestic market for the goods.
   No

5. Have there been any changes in market or consumer preferences in the domestic market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.
   No

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

1. Describe the importance of the domestic market to your company's operations. In your response describe:
   (a) The proportion of your company's sales revenue derived from sales of the goods in the domestic market and
   100%
   (b) The proportion of your company's profit derived from sales of the goods in the domestic market.
   100% from domestic sales. We have no export sales of rebar.

   In responding to question 1 please provide evidence supporting calculations.

2. Is your organisation/business entity the price leader for the goods in the domestic market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.
   Yes

3. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in the domestic market. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.
   We are the price maker in the country, and our pricing strategies are on the following priority bases:
   Cost-plus pricing

4. Explain the process for how the selling prices of the goods for the domestic market by your business are determined. Provide copies of internal documents which support how pricing is determined.

Our selling price is the maximum achievable selling price in the market. The selling price is reviewed weekly in our weekly marketing meeting.

5. How frequently are your domestic selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.
   Weekly. The price review happens in a weekly marketing meeting which is attended by director, GM Marketing Rebars, and marketing team members.

6. Rank the following factors in terms of their influence on your pricing decisions in the domestic market, with the most important factor ranked first and the least important factor ranked last:

   1. Purchase price of raw materials
   2. Cost to make and sell the goods
   3. Value of the order
   4. Desired profit
   5. Volume of forward orders
   6. Volume of the order
   7. Competitors' prices
   8. Customer relationship management
   9. Level of inventory
   10. Brand attributes
   11. Supplier relationship management
   12. Value of forward orders

7. Describe the relationship between selling price and costs to make and sell in the domestic market.
   Direct relationship.

   Does your company maintain a desired profit margin for the goods?
   Yes

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the domestic market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.
   No. None from the above.

9. Do you offer bundled pricing in the domestic market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.
   No

10. Does the volume of sales to a customer or the size of an order influence your selling price in the domestic market? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for the goods. Provide copies of internal documents which support your claims in response to this question.
    A little bit, not significant

11. Does your organisation/business entity use sales contracts in the domestic market? If yes:
    (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
    Yes. 100% of the sales done through sales contract.
    (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
    No.
    (c) How frequently are sales contracts renegotiated?

No renegotiation happens once the sales are locked

(d) How frequently are price reviews conducted between contracts?

Only once at the time of booking the order

(e) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.

No

(f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?

No

(g) Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue. Provide a complete translation of the documents.

Please look at attachment folder D-3 Sample Domestic Sales Docs

12. Provide copies of any price lists for the goods used in the domestic market during the investigation period. If you do not use price lists, describe the transparency of your prices in the domestic market.
    Please refer to folder “Price List”.

13. How do you differentiate pricing for different products/models of the goods in the domestic market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.
    No, we only sell one type of product rebars. Hence there is no differentiation based on the type of the product.

14. Do you tier or segment your domestic customers for the goods in terms of pricing?
    No, all customers are treated with the same treatment.
    If yes, provide:
    (a) a general description of how this is done
    (b) list the factors that influence pricing differentiation in different tiers or segments and
    (c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

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

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

J-4 Marketing and sales support in the domestic market

1. How does your company market the goods in the domestic market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).
   The value proposition used in the following priority wise order:
   1. Availability
   2. Reliability
   3. Superior quality
   4. Competitive price

2. Does your company conduct brand segmentation in the domestic market for the goods? No.
   If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.

3. Provide examples of your domestic advertising of the goods over the past five years. If you have not used advertising provide examples of any other promotion campaigns for the goods you have conducted over the investigation period.
   1. Participate in construction exhibition in Indonesia
   2. Print advertisement in steel directory in Indonesia

4. How many people are in your domestic market sales team and where are they located? [redacted] ([redacted] Jakarta and [redacted] Surabaya)
   In general terms, how are they remunerated? They are paid fixed salaries as per company policy
   If they are offered performance pay based on sales, No
   describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.
   A bottom sellable price is given to the sales team, and they are advised to fetch a higher selling price on that number.

SECTION K
AUSTRALIAN MARKET

Not Applicable

K-1 Prevailing conditions of competition in the Australian market

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

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

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

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

4. Identify the names of commercially significant importers in the Australian market for the goods over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the Australian market, if known.

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

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

- resource ownership
- patents and copyrights
- licenses
- barriers to entry
- import restrictions and
- government regulations (including the effect of those government regulations).

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

K-2 Goods in the Australian market

1. Generally describe the range of the goods offered for sale in the Australian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:
   - quality differences
   - price differences
   - supply/availability differences
   - technical support differences
   - the prevalence of private labels/customer brands
   - the prevalence of generic or plain labels
   - the prevalence of premium labels and
   - product segmentation.

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

3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Australian market. Rank these preferences or purchasing influencers in order of importance.

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

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

6. Have there been any changes in market or consumer preferences in the Australian market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

K-3 Relationship between price and cost in Australia

1. Describe the importance of the Australian market to your company's operations. In your response describe:
   (a) The proportion of your company's sales revenue derived from sales of the goods in Australia and
   (b) The proportion of your company's profit derived from sales of the goods in Australia.

   In responding to question 1 please provide evidence supporting calculations.

2. Is your organisation/business entity the price leader for the goods in the Australian market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

3. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Australia. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

4. Explain the process for how the selling prices of the goods for the Australian market by your business are determined. Provide copies of internal documents which support how pricing is determined.

5. How frequently are your Australian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.

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

7. Describe the relationship between selling price and costs to make and sell in the Australian market. Does your company maintain a desired profit margin for the goods? If not, does your company seek to maintain a desired profit margin for the goods? Provide copies of internal documents which support your response to this question.

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

9. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.

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

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

12. Provide copies of any price lists for the goods used in the Australian market during the investigation period. If you do not use price lists, describe the transparency of your prices in the Australian market.

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

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

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

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

K-4 Marketing and sales support in the Australian market

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

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

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

4. How many people are in your Australian sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

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

EXPORTER'S DECLARATION

I hereby declare that PT The Master Steel Manufactory have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

Name: **Istanto Burhan**

Signature:

Position in Company: Director

Date: **3 August 2026**