

End User Questionnaire

Case number: 691

Product: Aluminium Windows and Doors

From: The People's Republic of China (China)

Investigation period: 1 July 2024 to 30 June 2025

Response due by: 6 July 2026

Return completed questionnaire to:
investigations1@adcommission.gov.au

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

Background

The Anti-Dumping Commission (the commission) is investigating aluminium windows and doors (AWD, the goods) exported to Australia from the People's Republic of China provides details of the goods under consideration, the application, and the investigation procedures. The commission is seeking information from your company as an end user and/or retailer/reseller of AWD to inform its understanding of the Australian market and factors that influence supply arrangements in the market.

The commission collects and uses information in accordance with its [Collection and use of information policy](#). If you have any questions about this questionnaire, please respond by return email to investigations1@adcommission.gov.au.

If you decide to respond

Should your company elect to provide a response to this questionnaire, please note the following.

Confidential and non-confidential versions of response to questionnaire

If your company elects to respond to this questionnaire, you are required to lodge a confidential and a non-confidential version of your submission by the requested date. In submitting these versions, please ensure that each page of the information you provide is clearly marked either “**CONFIDENTIAL**” or “**NON-CONFIDENTIAL**” in the header and footer.

Please use redactions or brackets to mark confidential text an example of this:

Example of commercially sensitive text: “*Our company’s major competitors are companies X, Y and Z*”.

- “Our company’s major competitors are [REDACTED]”.¹
- “Our competitors are [company names]

All information provided to the commission in confidence will be treated confidentially.

The non-confidential version of your submission will be placed on the public record, which all interested parties can access. Your non-confidential submission must contain sufficient detail to allow a reasonable understanding of the substance of the confidential version. If, for some reason, you cannot provide a non-confidential summary, contact the case manager (see contact details on the first page of this questionnaire). A guide for making submissions is available on the commission’s webpage: [How to lodge a submission in response to an Anti-Dumping or countervailing case](#).

¹ Please mark redactions using Adobe PDF or Kofax programs. Alternatively, the commission can make these redactions for your company but please mark in red where your response’s redaction should commence.

Lodgement of questionnaire

The email address is via investigations1@adcommission.gov.au.

If you have any difficulties in completing the questionnaire, or require clarification on any questions asked, please contact the case manager as soon as possible at investigations1@adcommission.gov.au.

The goods

Full description of the goods the subject of Investigation 691
Aluminium windows and doors, whether fully or partially assembled, including their frames, panels, and sashes, with or without glass, whether or not thermally broken, whether or not including hardware, up to the following dimensions: • for window assemblies or partial assemblies (including window frames, panels and sashes), up to and including 3.0 metres high and up to and including 4.0 metres wide; and • for door assemblies or partial assemblies (including door frames, panels and sashes), up to and including 3.0 metres high and up to and including 7.0 metres wide.
Further information
“Fully assembled” refers to a complete window or door unit in which all frames and the applicable panels and/or sash are joined together to form a complete and functional window or door assembly, whether or not glazed, whether or not thermally broken, whether or not including hardware. “Partially assembled” refers to a fabricated aluminium frame, panel, or sash assembly that is supplied individually or connected to other frame, panel, or sash assemblies, where the combination does not yet form a complete window or door unit, whether or not glazed, whether or not thermally broken, whether or not including hardware.
Exclusions
Excluded are curtain wall products.

There are no legislated due dates for questionnaires of this nature however we would appreciate your response by 6 July 2026.

Hickory Group response — NON-CONFIDENTIAL version.

A Company information

1. Please provide a contact person for your company including:

Name: Steve Stavrou
Position: Commercial Director
Email: s.stavrou@hickory.com.au
Telephone: 0412 354 211

2. What is the legal name of your business and Australian Business Number (ABN)?

Hickory Group Holdings Limited (and all subsidiaries / related entities)

11 617 050 914

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

No.

4. Please briefly outline the overall nature of your business including company background and services provided by your company.

Hickory is a construction company specialising in the design and construction of medium- and high-rise residential, commercial, mixed-use and data centre developments. The company also designs and manufactures bathroom pods and precast building elements.

B Product and end use

5. Please describe how your business uses the goods, how you compete in the Australian market, including the relevant applications, projects, production processes or customer offerings in which the goods are used (optional).

Hickory is a building contractor delivering multi-storey residential, commercial and data-centre projects in Melbourne and Sydney. Aluminium windows, doors and the broader building-envelope package are a significant installed input in these buildings; Hickory is an end user of the goods, not a reseller. Through its façades arm, Hickory Facades Pty Ltd, Hickory imports building façade systems (curtain wall and window wall) from its China based factories for use on its own Australian projects. Hickory competes by delivering design-and-construct outcomes to program and budget, so reliable supply of compliant windows, doors and façade elements at the required scale and timeframe is central to its competitiveness.

6. Have there been any changes in your requirements or preferences for the goods over the last five years (for example, specification changes, technological developments, new suppliers, customer requirements, regulatory changes or product innovation)? If yes, provide details.

Over the last five years Hickory has seen increasing project scale and building height (driving demand for larger-format, higher-performance systems); tighter compliance requirements (NCC energy/thermal, acoustic and combustibility); growth in the data-centre segment; and continued reliance on offshore façade manufacture where local capacity is limited.

C Your company's sourcing and purchasing of AWD

7. Please describe how your company purchases AWD. In your response indicate whether purchases are typically made via:

- Formal tender process (RFQ) or competitive bidding processes
- Supplier pricelists or standard quoting prices
- Negotiations on project specific contracts
- Another purchasing method (please specify what this is)

Hickory purchases the goods primarily through project-specific competitive procurement. For each project the window/door/façade package is scoped from the design and issued to a shortlist of suppliers or subcontractors for pricing, with award based on an overall value assessment. In terms of the methods listed: negotiations on project-specific contracts and competitive bidding are the primary methods; supplier pricelists play a minor role for smaller ancillary items; and formal tender/RFQ is used on larger packages. Hickory Facades complete the design phase, before procuring the supply contract.

8. Please also outline:

- how many suppliers do you typically contact?
- how do you get quotes? (i.e. email, portal, tender, etc...)
- What factors decide the tender winner?
- Does this vary by project, customer or contract type

Typically, three to five suppliers contacted per package. Quotes are obtained by email/RFQ issued against the project drawings and specification (not an open portal). Best overall value is what determines the tender outcome — compliant specification, price, delivery program, capacity to meet the required volume and track record — not lowest price alone. Yes, it varies — by project scale, building type (residential, commercial or data centre) and whether the package is standard AWD or an engineered façade/window-wall system.

9. Provide an example of a recent decision where you chose one supplier over another, and explain the main reasons.

Hickory selects between suppliers on the basis of price, ability to meet the project program, capability and capacity, and technical suitability for the specified system. Hickory values long-standing supplier relationships and works with an established panel of suppliers, but the allocation of work is performance-based and informed by each supplier's most recent project performance. Suppliers that have performed well and have the capacity to deliver are preferred for larger projects, whereas a supplier whose recent performance has fallen below the required standard is retained on Hickory's tender list but directed toward smaller-scale projects until performance is re-established. On a recent package, Hickory selected one supplier over another on this basis — awarding the work to the supplier offering the best overall combination of price, program certainty, capability and technical suitability, supported by strong recent project performance and the capacity to ensure on-time, compliant delivery.

10. Please identify your current suppliers of the goods and indicate whether you purchase from Australian manufacturers, Australian importers/distributors, or direct importers.

Hickory is an end user of the goods. It purchases the in-scope goods (standalone aluminium windows and doors) predominantly from Australian sources; direct imports of the in-scope goods are negligible. Current suppliers, by category:

Australian manufacturers / fabricators: [Australian aluminium window, door and glazing fabricators] — the primary source of in-scope AWD.

Direct importers: Direct imports of the in-scope goods are negligible. Separately, through Hickory Facades Pty Ltd, Hickory directly imports curtain wall and window wall façade systems from China (from [Chinese façade manufacturers]), which Hickory considers fall within the "curtain wall products" exclusion and outside the scope of this questionnaire.

Specific supplier names are provided in the confidential version.

11. Please also complete the following table relating to your purchases in the last four years. For each year, please enter the quantity purchased and specify the unit of measurement.

Source / supplier type	FY2022	FY2023	FY2024	FY2025	Unit of measure
Purchases from Australian manufacturer(s)	[commercially sensitive]	[commercially sensitive]	[commercially sensitive]	[commercially sensitive]	AUD net spend (proxy) †‡
Purchases from Australian importer(s) or distributor(s)	Incl. above ‡	Incl. above ‡	Incl. above ‡	Incl. above ‡	
Direct imports	Negligible	negligible	negligible	negligible	AUD net spend (proxy) †

Other relevant source category [specify]	None (in-scope)				See scope note below
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Notes on the table above:

For the in-scope goods, Hickory sources predominantly from Australian suppliers; direct imports of in-scope aluminium windows and doors are negligible in each year.

† Figures are Australian-dollar net spend, provided as a proxy — unit quantities are not maintained in that form. Actual figures are provided in the confidential version.

‡ Australian manufacturer and importer/distributor spend is not separately split in Hickory's system; the combined Australian figure is shown against "Australian manufacturer(s)".

Scope note: Separately, Hickory directly imports curtain wall and window wall façade systems from China in a material amount each year (figures provided in the confidential version). Hickory considers these fall within the express "curtain wall products" exclusion and are therefore not included as in-scope AWD in the table above.

D Competition and supplier assessment

12. Indicate how important each factor is when selecting a supplier. Please rank the factors by using a rating scale low, medium or high. Where relevant, explain how you make trade-offs in practice.

Factor	Importance / ranking	Comments
Price / net delivered cost	High	Central to project feasibility
Quality / fitness for purpose	High	Must meet compliance and design intent
Availability of required specifications	High	Large-format/engineered systems must be available
Reliability of supply	High	Program-critical input
Lead time / timeliness of delivery	High	Drives the construction program
Ability to negotiate commercial terms	Medium	Relevant but secondary
After-sales support / technical support	Medium	Important for engineered façade systems
Country of origin / preference for Australian-made goods	Low–Medium	Support local, but not at the expense of feasibility
Existing supplier relationship	Medium	Valued for reliability, not decisive
Range of products offered by supplier	Medium	More relevant for façade/window-wall
Other [specify]		

13. Indicate how do Australian-made goods compare with imported goods, or how do competing imported sources compare with one another, in terms of price, quality, range, reliability, lead time and technical suitability?

For each factor below, **tick** one option only to show whether Australia is better, the same, or worse than imports. Use the comments column if needed.

Factor	Australia better	Same	Australia worse	Comments
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Price			X	Imported generally lower landed cost
Quality		X		Comparable where specified and compliant
Range			X	Imports offer greater range/large-format capability
Reliability			X	Local constrained at high volume
Lead time			X	Local capacity limits on large volumes
Technical suitability		X		Both can meet specification

14. Do you have a preference for any source of supply? If yes, explain why

Yes, although the position differs by product type. For the in-scope goods (standalone aluminium windows and doors), Hickory has no fixed source preference and sources predominantly from Australian suppliers, selecting on best overall value and the ability to meet scale, specification and program. For the building façade systems Hickory imports (curtain wall and window wall systems, which Hickory considers fall within the "curtain wall products" exclusion), Hickory's preference is to source from China. This is because the raw materials and original components for these systems are themselves produced in China: sourcing there avoids transporting and shipping raw materials into another market for fabrication, and the resulting integrated, co-located supply chain delivers more competitive pricing and lead times. That competitiveness reflects a genuine and legitimate cost and supply-chain advantage rather than any pricing advantage in the finished product alone. Where possible, Hickory supports local manufacturing and its role in supply chains, but for major multi-storey projects imported façade supply is often necessary because local capacity is insufficient to meet the required scale, specification and program.

15. Have you in the last 5 years changed suppliers or supplying countries? If so, please explain the reasons for the change.

No. Hickory has not changed its supplying countries over the last five years and has maintained a stable core supplier base throughout — its façade systems continuing to be sourced from China and its in-scope aluminium windows and doors predominantly from Australian suppliers. This continuity reflects the value Hickory places on established, proven supplier relationships and the practical barriers to switching, including qualification, technical approval and re-certification requirements.

16. If you have not changed your sources of supply, what would cause you to switch from Australian supply to imported supply, or vice versa?

Switching is driven by whether a source can meet specification, volume, program and cost for a given project. Hickory would shift toward local supply where it can reliably meet scale, timeframe and price, and toward imports where local capacity, range or cost cannot. Mid-project switching is constrained — it typically requires redesign and re-certification.

17. How often do you purchase from the lowest-priced supplier? If you do not always purchase from the lowest-priced supplier, explain why.

Not always. Hickory awards on best overall value rather than lowest price and regularly selects a supplier other than the cheapest where warranted. In deciding, Hickory considers whether the supplier can meet the required compliant specification, performance and certification; whether it can deliver within the project program; whether it is financially sound and adequately resourced to complete the package; and its history and reputation, including demonstrated performance, quality and reliability on Hickory's previous projects. Where the lowest-priced supplier cannot satisfy these requirements, Hickory will pay more than the lowest quote to secure compliant supply, program certainty and delivery reliability.

18. Have you experienced any quality issues, delivery delays, shortages or other supply problems with the goods? If yes, provide details including the supplier of the goods and any supporting evidence.

Hickory has not experienced material or systemic supply problems with the in-scope goods, which are predominantly sourced from Australian suppliers. In relation to the building façade systems Hickory imports (curtain wall and window wall systems, which Hickory considers fall within the "curtain wall products" exclusion), the principal known risk is seasonal: in the weeks leading up to and following the Chinese New Year break, Chinese supply can be subject to delivery delays, shortages and quality variances. This is a well-understood and predictable factor that Hickory has managed for many years through an established mitigation strategy — including a Hickory-employed quality assurance and quality control (QA/QC) team embedded within its manufacturing facility in China to manage quality and delivery risk at source. As a result, this seasonal factor is anticipated and actively controlled and does not translate into material disruption to Hickory's projects.

E Market Conditions and end user impacts

19. Describe the market in which your business uses or purchases the goods, including the main sources of demand, key customer or project segments, and any practical features that affect purchasing decisions.

Hickory operates as a builder in the Australian multi-storey residential, commercial and data-centre construction market. Demand for the goods is derived from Hickory's own project pipeline. Key features affecting purchasing include project scale and height, engineered and large-format requirements,

compliance (NCC energy, acoustic and combustibility), fixed construction programs, and the need to procure large volumes to a locked-in design.

- 20.** Please describe the Australian market competition and demand drivers for AWD. In particular, please outline the influence demand for the goods in your market (for example, construction activity, commodity cycles, customer requirements, government policy, infrastructure projects, seasonality or technology changes

Demand is driven by construction activity and the national housing and infrastructure task. Building and construction is one of Australia's largest sectors — the total value of building and construction work done in the year to June 2025 was \$324.6 billion, about 11.7% of GDP — and the National Housing Accord targets 1.2 million new homes over the five years to June 2029, with delivery tracking materially behind target, alongside significant growth in the major public infrastructure pipeline. The cost and availability of building-envelope inputs directly affect project feasibility and delivery.

- 21.** Have there been any significant changes in supply availability, competition, pricing or customer preferences over the last four to five years? If yes, provide details.

Over the last four to five years Hickory has observed cost escalation, capacity constraints in local supply, and greater reliance on offshore façade manufacture.

- 22.** What are the barriers to switching suppliers or substituting alternative products, including technical approvals, qualification requirements, commercial arrangements or customer specifications?

Barriers are significant: technical approvals and re-certification, qualification and compliance requirements, project-specific engineering and design/customer specifications, and locked-in commercial arrangements. Once procurement is committed to a design, substitution is impractical without redesign and re-certification.

In particular:

- a. are domestic and imported suppliers generally able to compete for the same projects/sales

Generally, yes for standard AWD packages. For large engineered façade/window-wall systems, options are narrower and often require offshore manufacture and project specific designs.

- b. do you consider the locally produced AWD to be substitutable with imported AWD

For standard windows and doors, broadly yes on a like-for-like specified basis. For large-format or engineered systems, substitutability is limited by local capacity and range.

- 23.** Are there circumstances where Australian suppliers cannot meet your requirements? If yes, provide examples, including whether the issue relates to:
- Price;
 - Product specifications (e.g. required size, design, or performance not available);
 - Availability (e.g. stock shortage or limited supply);
 - Delivery timeframes (e.g. unable to meet project deadlines);
 - Scale (e.g. unable to supply large volumes);
 - Certifications or approvals required for your projects;
 - Technical support or service requirements.

In Hickory's experience, Australia does not currently have sufficient local capability and capacity to reliably meet demand at the scale, timeframe and specification required for major multi-storey projects. The most common constraints are scale (large volumes), delivery timeframes (meeting project program), specification/range (large-format or engineered systems) and price. Availability and certification can also arise on specialised systems.

F Additional information or comments

- 24.** Please provide any additional information or comments you consider relevant to this investigation/review, including any views regarding the operation of the market, supply conditions, purchasing considerations, or the likely effect of changes in the price or availability of the goods.

Hickory opposes the imposition of measures. A tariff is a blunt instrument that would apply broadly and is likely to increase costs across the sector, including for projects delivering housing and essential economic infrastructure; those increased costs and constrained supply would ultimately be borne by end users, home buyers and taxpayers. Critically, Hickory requests clear and consistent application of the "curtain wall products" exclusion, so that façade systems (including window wall) that are in substance curtain wall/façade products are not unintentionally captured within scope. Hickory remains available to provide further information on its projects, the role of façade packages in project cost and program, and the practical constraints of mid-project substitution.

G Certification

The information supplied in this questionnaire is complete and correct to the best of my knowledge.

Certifier name: Steve Stavrou

Certifier role: Commercial Director

Date: 09/07/2026