PUBLIC RECORD

Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Exporter verification report

Verification and case details

Company verified	Guangdong Kete Facadetech Co.,Ltd		
Case number	691		
Initiation Anti-Dumping Notice (ADN)	2025/115		
The goods under consideration	Aluminium windows and doors		
Case type	Dumping and subsidy investigation		
Location	Building 2, No. 66, Heyi Road, Yanghe Town, Gaoming District, Foshan City, Guangdong province, China		
Verification meeting dates	6/05/2026	to	8/05/2026
Investigation period	1/07/2024	to	30/06/2025

This report details the findings and recommendations of a verification team in the Anti-Dumping Commission.

This report may not reflect the Anti-Dumping Commission's final position.

CONTENTS

1 ABOUT THIS REPORT

The Anti-Dumping Commission (the commission) issued a questionnaire that sought exporter data and information for Dumping and Subsidy Investigation 691 (case 691) into Aluminium Windows & Doors exported from the People's Republic of China (China) during the investigation period.

Guangdong Kete Facadetech Co.,Ltd (Guangdong Kete), an exporter of the goods from China, submitted a questionnaire response.

The commission met with Guangdong Kete Guangdong Kete to verify the response and assessed the reliability of the information.

The commission has reviewed the information submitted by Guangdong Kete. This report details the commission's verification findings and recommendations about Guangdong Kete for case 691.

A finding made in this verification report (verification finding) and verification recommendations (verification recommendations) are made in the context of this verification only. These verification findings and verification recommendations may be referred to and relied on in the statement of essential facts and final report for case 691.

In this report, unless otherwise stated:

- all **sections** cited are from the ***Customs Act 1901*** **(Cth)**
- all **regulations** cited are from the ***Customs (International Obligations) Regulation 2015*** **(Cth)**
- the term **ADN** refers to **Anti-Dumping Notice**.

The commission details its process and findings in the verification work program at **Confidential attachment 1**.

2 KEY OUTCOMES

Dumping margin	Cannot yet calculate a dumping margin
Subsidy margin	0.8%
Export price method	269TAB(1)(a)
Normal value method	269TAC(2)(c)
Adjustment method	Cannot yet determine if section 269TAC(8) or 269TAC(9) price adjustments should apply
Sales data complete, relevant and accurate?	Yes, with material revisions
Cost data complete, relevant and accurate?	Yes, with material revisions
Subsidy data complete, relevant and accurate?	Yes, with material revisions

3 VARIABLE FACTORS

3.1 About this chapter

This chapter details the commission's recommendations about how to set the variable factors used to calculate the rates of dumping and countervailable subsidy for goods that Guangdong Kete produced or sold.

Australian customs law sets out different ways to calculate variable factors based on the facts available.

This chapter summarises the commission's recommendations about how to set:

- an **export price**
- a **normal value**
- a **dumping margin**
- a **subsidy margin**.

More information on what variable factors are and how the commission determines variable factors is in **Non-Confidential Appendix 1**.

3.2 Export price

Unrelated customers

The commission recommends setting an export price for Guangdong Kete to unrelated customers under section 269TAB(1)(a).

Under this section, an export price is the price paid by the importer to the exporter less transport and other costs arising after exportation.

Related customers

The commission recommends setting an export price for Guangdong Kete to related customers under section 269TAB(1)(b).

With respect to the Australian sales of the goods by Guangdong Kete to its related Australian trading entity, Kete Facadetech Co Ltd (Kete Australia), the commission recommends that the export price cannot be determined under section 269TAB(1)(a). As discussed in section 3.2.3.2, including information obtained during the verification of Kete Australia, the commission considers that sales of the goods by Guangdong Kete to Kete Australia were not made in arm's length transactions.

The commission found that Kete Australia sold the goods in the condition that it purchased the goods from Guangdong Kete. The commission recommends calculating the export price under section 269TAB(1)(b) being the price at which Kete Australia sold to unrelated customers, less prescribed deductions.

The commission recommends calculating the export price using the prices at which Kete Australia sold the goods to unrelated customers, less the following deductions:

- amounts of Kete Australia's selling, general and administrative (SG&A) costs and profit
- importation costs such as Australian general customs duty, Australian port and handling charges and Australian inland freight, and

- post exportation costs, such as ocean freight and marine insurance.

Confidential appendix 1 contains the commission's export price calculations.

3.2.1 Who is the exporter?

The commission considers Guangdong Kete is the exporter of the Australian export goods because this company:

- produced the Australian export goods
- is named as the supplier on commercial invoices
- is named as consignor on bills of lading
- arranged and paid for inland transport to the port of export.

3.2.2 Who is the importer?

For all transactions, the commission considers the Australian customer is the importer of the Australian export goods. In other words, the Australian customer beneficially owned the Australian export goods at the time of import into Australia.

For each transaction, the Australian customer:

- is named as the consignee on bills of lading
- is named as the importer on import declarations to ABF.

3.2.3 Were the Australian export sales sold at arm's length?

3.2.3.1 Unrelated customers

For all unrelated customer transactions, the commission finds that Guangdong Kete sold the Australian export goods **at arm's length** as defined under section 269TAA.

For these transactions, the commission does not find that:

- there was consideration for the goods other than price
- a relationship between a buyer, a seller or their associates appeared to influence the price
- a buyer or buyer's associate directly or indirectly received compensation, reimbursement or another benefit for, or relating to, any part of the price.

For these transactions, the commission notes that Guangdong Kete :

- appeared to genuinely negotiate the price with unrelated customers.

3.2.3.2 Related customers

For all sales from Guangdong Kete to its Australian trading entity, Kete Australia, the commission finds that these Australian export sales are not arm's length transactions as defined under section 269TAA.

In reaching this conclusion, the commission conducted a verification of Kete Australia as part of the investigation. Information obtained during that verification informed the commission's assessment of the relationship between Guangdong Kete and Kete Australia and the pricing arrangements governing sales between the entities.

The commission considers that the price between Guangdong Kete and Kete Australia is influenced by a commercial relationship because:

- Kete Australia is wholly owned by Guangdong Kete; and
- prices are established in accordance with Guangdong Kete's and Kete Australia's internal pricing guidelines.

Accordingly, the commission considers that the Australian export sales from Guangdong Kete to Kete Australia are not arm's length transactions.

3.3 Normal value

The commission does not recommend how to set a normal value because the commission has not yet decided to accept or reject a claim that affects which normal value section applies to Guangdong Kete. The commission will set a normal value after deciding to accept or reject the claim.

Case 691 includes a claim that domestic like goods sales are unsuitable to use in a normal value set under section 269TAC(1), as detailed in chapter **3.3.4**. The claim states that the situation in Guangdong Kete’s market means that domestic like goods sales are unsuitable, as described under section 269TAC(2)(a)(ii).

If the commission accepts this claim and section 269TAC(2)(a)(ii) applies, then the commission must set a normal value under section 269TAC(2)(c). Otherwise, the commission may set a normal value under a different section.

If the commission sets a normal value under section 269TAC(2)(c), the commission recommends adjusting the domestic like goods sales prices when setting a normal value. The commission recommends these adjustments to properly compare the normal value to the export price to measure the level of dumping, under section 269TAC(9).

The commission recommends the following adjustments:

Adjustment description	How to apply an amount for adjustment
Domestic credit terms	Deduct an amount for domestic credit
Export inland transport	Add an amount for export inland transport
Export port handling charges	Add an amount for export port handling charges
Export credit terms	Add an amount for export credit terms
Specification	Add or deduct an amount for specification

Table 1 Summary of adjustments

The commission calculated and applied adjustments in the normal value calculations at Error! Reference source not found..

3.3.1 Did the verified company produce and sell like goods for the domestic market?

The commission finds that, during the investigation period, Guangdong Kete produced and sold like goods for domestic home consumption.

The commission finds that these goods were 'like goods' because these domestics goods are identical to, or closely resemble, the Australian export goods. The commission has described its reasons below.

3.3.1.1 Physical likeness

Guangdong Kete does not distinguish between domestic like goods and the Australian export goods.

3.3.1.2 Production likeness

Guangdong Kete produced all goods at the same facilities, using the same raw material inputs and production processes.

3.3.1.3 Commercial likeness

All goods compete in the same market sector, are interchangeable and use similar distribution channels.

3.3.1.4 Functional likeness

All goods are functionally alike, as they have similar end uses, however, are manufactured to a specific requirement as per the project contract.

3.3.2 Were the domestic sales sold at arm's length?

3.3.2.1 Unrelated customers

For all unrelated customer transactions, the commission finds that Guangdong Kete sold the domestic goods **at arm's length** as defined under section 269TAA.

For these transactions, the commission does not find that:

- there was consideration for the goods other than price
- a relationship between a buyer, a seller or their associates appeared to influence the price
- a buyer or buyer's associate directly or indirectly received compensation, reimbursement or another benefit for, or relating to, any part of the price.

For these transactions, the commission notes that Guangdong Kete:

- sold goods at similar prices to all unrelated customers
- appeared to genuinely negotiate the price with unrelated customers.

3.3.2.2 Related customers

For all related customer transactions, the commission finds that Guangdong Kete sold the domestic goods **at arm's length** as defined under section 269TAA.

For these transactions, the commission does not find that:

- there was consideration for the goods other than price
- a relationship between a buyer, a seller or their associates appeared to influence the price
- a buyer or buyer's associate directly or indirectly received compensation, reimbursement or another benefit for, or relating to, any part of the price.

For these transactions, the commission notes that Guangdong Kete:

- sold goods at similar prices to related and unrelated customers
- appeared to genuinely negotiate the price with related customers.

3.3.3 Do the accounting records comply with generally accepted accounting principles?

The commission finds that Guangdong Kete's accounting records for the investigation period comply with the generally accepted accounting principles of China.

Daxin Certified Public Accountants LLP Nansha FTA Branch. audited Guangdong Kete's financial statement and included a statement that the financial accounts comply with Chinese Accounting Standards for Business Enterprises (ASBEs) in the annual report.

3.3.4 Did the production records reasonably reflect competitive market costs?

The commission finds that Guangdong Kete's production records may not reasonably reflect competitive market costs for one or more cost components.

3.3.4.1 Ongoing case claims about production records

Case 691 includes a claim that aluminium extrusion and glass prices in China, including Guangdong Kete's records, do not reasonably reflect competitive market costs. The aluminium extrusion and glass price comprises part of the cost to make the goods.

The commission collected information about aluminium extrusion and glass prices. The commission will review this information when assessing the claim.

3.3.4.2 The commission's finding about related party suppliers

Guangdong Kete purchased aluminium extrusion and glass from during the investigation period.

The commission considers that the relationship between related party suppliers and Guangdong Kete may have influenced the price of raw material purchases.

3.3.5 Were domestic sales in the ordinary course of trade?

The following table summarises the figures the commission used to assess if Guangdong Kete's domestic like goods sales are in the ordinary course of trade.

Component	Details
Extended unprofitability period	The investigation period
Reasonable recoverability period	The investigation period
Price	Net invoice price
Cost	Annual cost to make and sell the like goods, including direct selling expenses for each transaction.
Weighted average cost	Weighted average cost to make and sell the like goods over the investigation period, including direct selling expenses for each transaction.

Table 2 Ordinary course of trade assessment details

3.3.5.1 Domestic sales volumes for each model

Table 3 details the commission’s findings about domestic sales volumes for each corresponding Australian export sales model. The commission has not relied on model control codes (MCC) for the calculation of the dumping and subsidy margin. Instead, the commission has relied on verified project data.

Export project	Is projects domestic sales volume 5% or greater the export sales volume?	Treatment of normal value
245	All projects are different and there is no domestic project which precisely matches to the export project. However, the commission has conducted a surrogate review based on the contracts for all export and domestic projects.	The commission has used the domestic project ‘GM’ as the surrogate for all export projects, as it was the only sufficient project, within the ordinary course of trade, sold by Guangdong Kete’s during the period of investigation.
333		
24L		
24Y		
8LS		
AF		
C1		
CCQ		
ESP		
HST		
HWLS		
LCP		
ODS		
PS		
RS		
TC		
TGP		
WB		
YM		
ZBS		
ZP		

Table 3 Export models compared to domestic model by volume

The commission’s volume analysis is at **Confidential Appendix 3.**

3.3.6 Calculating a profit margin for the normal value

Where the commission is required to calculate a normal value under section 269TAC(2)(c), an amount of profit must be worked out under regulation 45.

At this stage of the investigation, the commission calculated an amount of profit based on the profit achieved on all domestic sales of like goods in the ordinary course of trade in accordance with regulation 45(2). However, due to a claim that aluminium extrusion and glass costs in China do not reasonably reflect competitive market costs, and the commission’s ongoing investigation on whether ’s related supplier transactions reflect competitive market costs, the commission’s profit calculation may change.

The commission’s preliminary domestic profit calculation is at **Confidential Appendix 3.**

3.3.7 Adjustments to compare export price and normal value

The commission assessed all potential adjustments to properly compare the export price for Australian export goods to the corresponding normal value.

Adjustment type	Adjustment assessment – is the adjustment required?	Evidence and calculation method – how was the adjustment applied?	Who claimed this adjustment?	Did the commission apply this adjustment?
Domestic credit terms	Credit terms are provided to domestic customers. A downwards adjustment to domestic prices is therefore necessary to ensure a fair comparison to export prices.	Calculated based on the payment terms provided to domestic customers and interest rate based on the weighted average short-term loans.	Guangdong Kete	Yes.
Export inland transport	Inland transport expenses incurred on export sales to Australia were found to differ from the amount incurred on domestic sales. An upwards adjustment to the normal value is therefore necessary to ensure a fair comparison to export prices.	Calculated based on the weighted average export inland transport expenses with reference to the export inland transport invoices.	Guangdong Kete	Yes.
Export port handling charges	Port handling and other export charges expense incurred on export sales to Australia was found, which was not incurred on domestic sales. An upwards adjustment to the normal value is therefore necessary to ensure a fair comparison to export prices.	Calculated based on the weighted average export port handling expenses with reference to the export port handling invoices.	The commission.	Yes
Export credit terms	Credit terms were provided to Australian customers. An upwards adjustment to the normal value is therefore necessary to ensure a fair comparison to export prices.	Calculated based on the payment terms provided to Australian customers and interest rate based on the weighted average short-term borrowings.	Guangdong Kete	Yes.

Adjustment type	Adjustment assessment – is the adjustment required?	Evidence and calculation method – how was the adjustment applied?	Who claimed this adjustment?	Did the commission apply this adjustment?
Specification	Where a surrogate project is used for a normal value of a project exported to Australia, an adjustment for the specification differences is required to ensure a fair comparison.	Calculated based on the difference between the quarterly CTMS of the export MCC and the surrogate MCC, plus amount for profit.	The commission.	Yes

Table 4 Assessment of adjustments

3.4 Countervailable subsidy

The commission found that Guangdong Kete received a benefit in relation to various grant programs and tax benefits. The commission assessment of each program is set out below:

Program name	Finding	Attribution	During period of investigation?
Received Ten-Hundred-Thousand Enterprises—Subsidy for Encouraging Accelerated Growth Zones	Received Ten-Hundred-Thousand Enterprises—Subsidy for Encouraging Accelerated Growth Zones	The whole company	No
Received Maternity Allowance	Received Maternity Allowance	A particular individual	No
Received One-time Employee Retention Subsidy	Received One-time Employee Retention Subsidy	The whole company	No
Received High-tech Enterprise Reward Subsidy	Received High-tech Enterprise Reward Subsidy	The whole company	No
Received Maternity Allowance	Received Maternity Allowance	A particular individual	No
Received Social Security Subsidy for Small and Micro Enterprises	Received Social Security Subsidy for Small and Micro Enterprises	The whole company	No
Received 2022 One-time Job Expansion Subsidy	Received 2022 One-time Job Expansion Subsidy	The whole company	No
Received 2022 Intellectual Property Funding	Received 2022 Intellectual Property Funding	The whole company	No
Received 2022 Digital Workshop Subsidy	Received 2022 Digital Workshop Subsidy	The whole company	No
Received Social Security Subsidy for Small and Micro Enterprises	Received Social Security Subsidy for Small and Micro Enterprises	The whole company	No
Received 2022 Personal Income Tax Handling Fee Refund	Received 2022 Personal Income Tax Handling Fee Refund	The whole company	No

Program name	Finding	Attribution	During period of investigation?
Received Employment Subsidy for Hiring Disabled Persons	Received Employment Subsidy for Hiring Disabled Persons	The whole company	No
Received 2021 Foshan High-tech Zone Intellectual Property Funding Policy Award and Subsidy	Received 2021 Foshan High-tech Zone Intellectual Property Funding Policy Award and Subsidy	The whole company	No
Received Maternity Allowance	Received Maternity Allowance	A particular individual	No
Received 2023 One-time Job Expansion Subsidy	Received 2023 One-time Job Expansion Subsidy	The whole company	No
Received Maternity Allowance	Received Maternity Allowance	A particular individual	No
Received Interest Subsidy for Provincial Specialized, Refined, Distinctive, and Innovative Projects	Received Interest Subsidy for Provincial Specialized, Refined, Distinctive, and Innovative Projects	The whole company	No
Received Social Security Subsidy for Small and Micro Enterprises	Received Social Security Subsidy for Small and Micro Enterprises	The whole company	No
Received Maternity Allowance	Received Maternity Allowance	A particular individual	No
Received Tax Preferential Refund for Enterprises Hiring Key Impoverished Groups	Received Tax Preferential Refund for Enterprises Hiring Key Impoverished Groups	The whole company	No
Received Social Security Subsidy for Small and Micro Enterprises	Received Social Security Subsidy for Small and Micro Enterprises	The whole company	No
Received 2024 One-time Job Expansion Subsidy	Received 2024 One-time Job Expansion Subsidy	The whole company	No
Refunded Personal Income Tax Handling Fee	Refunded Personal Income Tax Handling Fee	The whole company	No
Received Employment Subsidy for Hiring Disabled Persons	Received Employment Subsidy for Hiring Disabled Persons	The whole company	No
Received Social Security Subsidy for Small and Micro Enterprises	Received Social Security Subsidy for Small and Micro Enterprises	The whole company	No
Received Maternity Allowance	Received Maternity Allowance	A particular individual	Yes
Received Education and Learning Funds for Two New Party Organizations	Received Education and Learning Funds for Two New Party Organizations	The whole company	Yes
Received Social Security Subsidy for Small and Micro Enterprises	Received Social Security Subsidy for Small and Micro Enterprises	The whole company	Yes
Received Unemployment Insurance Stable	Received Unemployment Insurance Stable	The whole company	Yes

Program name	Finding	Attribution	During period of investigation?
Employment Return Subsidy	Employment Return Subsidy		
Received Maternity Allowance (Wang Haimei)	Received Maternity Allowance (Wang Haimei)	A particular individual	Yes
Received 2024 Foshan Economic High-quality Development Special Funds (Service Outsourcing Direction)	Received 2024 Foshan Economic High-quality Development Special Funds (Service Outsourcing Direction)	The whole company	Yes
Received Provincial Stable Foreign Trade Funds (First Batch) Enterprise Order Grabbing Subsidy	Received Provincial Stable Foreign Trade Funds (First Batch) Enterprise Order Grabbing Subsidy	Export sales	Yes
Received Personal Income Tax Handling Fee Refund	Received Personal Income Tax Handling Fee Refund	The whole company	Yes
Received Employment Subsidy for Hiring Disabled Persons	Received Employment Subsidy for Hiring Disabled Persons	The whole company	Yes
Received Employment Subsidy for Hiring Disabled Persons	Received Employment Subsidy for Hiring Disabled Persons	The whole company	Yes
Received Maternity Allowance	Received Maternity Allowance	A particular individual	Yes
Received 2023 Reward Funds for Supporting Industrial Enterprises in Increasing Production and Efficiency (Municipal Portion)	Received 2023 Reward Funds for Supporting Industrial Enterprises in Increasing Production and Efficiency (Municipal Portion)	The whole company	Yes
Received Social Security Subsidy for Small and Micro Enterprises	Received Social Security Subsidy for Small and Micro Enterprises	The whole company	Yes
Deduction: tax exemption, deduction of income and additional deduction	Deduction applied in the company tax return for R&D expenses and reduced taxable income.	The whole company	Yes

Table 5 Subsidy programs

The commission will outline the assessment of whether the above programs are countervailable in the statement of essential facts.

4 VERIFICATION DETAILS

4.1 About this chapter

This chapter details what the commission found when verifying Guangdong Guangdong Kete's questionnaire response for case 691.

This chapter first summarises the commission's assessment of Guangdong Kete's submitted information. This summary includes a list of material revisions made to this information before the commission finalised the verification.

This chapter summarises verified key details about Guangdong Kete, relating to:

- the range of goods produced or sold
- corporate operations and structure.

This chapter then outlines the commission's method to verify and validate Guangdong Guangdong Kete's submitted information.

More information on how the commission verifies information is in **Non-Confidential Appendix 1**.

4.2 Verification findings and material revisions

The commission finds that the information Guangdong Kete submitted is complete, relevant and accurate after material revisions.

4.2.1 Sales

Material revision 1: Third country sales originally reported in the domestic sales listing

Description: Guangdong Kete originally included third country sales (or third country projects) in the D-2 (domestic sales listing) submitted in the original REQ.

Resolution: Guangdong Kete confirmed that these sales of goods were bound for third country markets. As such, Kete agreed to remove the sales from the domestic sales listing and move into the third country sales listing.

Material revision 2: Additional components of window and doors included as the GUC

Description: Guangdong Kete originally excluded certain sales of aluminium sheets (spandrel panels), standalone glass and certain accessories, which formed part of the projects on the domestic and Australian market.

Resolution: The team confirmed that these sales components form part of the larger project, which are agreed upon in the contracts for the projects themselves. As such, Kete agreed to add these sales for aluminium sheets (spandrel panels), standalone glass and certain accessories, into the B-2 (Australian sales listing), D-2 (domestic sales listing) and F-2 (Third country sales listing) linked to each corresponding project.

Material revision 3: Change to customer name in the Australian sales listing

Description: Guangdong Kete originally reported a sale to an Australian customer which they believed was the correct customer as per the project, however this was not correct. The team found that the customer name was reported incorrectly in the B-2 (Australian sales listing). **Resolution:** Guangdong Kete corrected the customer's name for this sale and re-submitted the B-2 Australian sales listing.

Material revision 4: Removal of sample sales from the Australian sales listing

Description: Guangdong Kete originally reported two invoices in the B-2 listing which are sample sales. The team found that the unit prices for these sales were very high compared to other sales made by Kete during the period of investigation. Guangdong Kete confirmed that these sales were sample sales, made to Australian customers. **Resolution:** The verification team have removed these two invoiced sales from the Australian sales listing.

Material revision 5: Removal of windows and doors above 3.0m height

Description: Guangdong Kete originally reported sales of windows and doors with a sub-identifier of 'H6' in the B-2 Australian sales listing. As per ADN 2025/115, windows and doors exceeding this height are excluded. Guangdong Kete confirmed that these sales were above the 3.0m height, hence why they were reported as 'H6'. **Resolution:** The verification team have removed these sales from the revised export sales spreadsheet, as they are not the goods under consideration for the investigation.

Material revision 6: Domestic sales listing to include customer name in English

Description: The original domestic sales listing provided did not include customer names in English. Guangdong Kete agreed to update the domestic sales listing to include the relevant customer names in English for all domestic sales. **Resolution:** Guangdong Kete provided an update D-2 domestic sales listing with customer names translated in English.

Material revision 7: Removal of windows and doors above 3.0m height

Description: Guangdong Kete originally reported sales of windows and doors with a sub-identifier of 'H6' in the D-2 domestic sales listing. As per ADN 2025/115, windows and doors exceeding this height are excluded. Guangdong Kete confirmed that these sales were above the 3.0m height, hence why they were reported as 'H6'. **Resolution:** The verification team have removed these sales from the revised domestic sales spreadsheet, as they are not the goods under consideration for the investigation.

Material revision 8: Update to related party column for domestic sales

Description: The original domestic sales listing provided did not include identification of customers who were related parties to Kete. Kete agreed to change the domestic sales listing and update the relevant related party column to identify the customer as being a related party to Guangdong Kete.

Resolution: Guangdong Kete provided a revised D 2 domestic sales worksheet identifying the related parties in the listing.

4.2.2 Cost to make and sell

Material revision 9: Third country costs originally reported in the domestic sales CTM

Description: Guangdong Kete originally included third country costs (or third country projects) in the domestic cost to make submitted in the original REQ.

Resolution: Guangdong Kete confirmed that these costs reported in the domestic CTM are for third country projects. As such, Guangdong Kete agreed to remove the third country costs from the domestic CTM.

Material revision 10: Additional taxes and surcharge accounts added to SG&A

Description: Taxes and surcharges were not originally reported in the SG&A submitted by Kete.

Resolution: Guangdong Kete agreed during verification to add all relevant taxes and surcharge accounts into the SG&A listing.

Material revision 11: Update to the SG&A calculation

Description: The original SG&A calculation was completed incorrectly by Kete due to an incorrect formula being applied in the workbook.

Resolution: The verification team amended the calculation by applying the correct SUMIF formula to the SG&A listing provided by Guangdong Kete. Guangdong Kete agreed to the verification team updating the SG&A calculation accordingly.

Material revision 12: Domestic sales reported in SG&A updated

Description: Following the removal of third country sales from the domestic sales listing, the domestic sales values and quantities used in the SG&A calculation were incorrect.

Resolution: During verification, Guangdong Kete agreed to correct the domestic sales values and quantities in the SG&A calculation.

Material revision 13: Cost to make variances

Description: The verification team identified variances between cost components reported in the Australian and domestic cost to make (CTM) listings and Guangdong Kete's underlying production records. These variances were not appropriately allocated in the originally submitted CTM. In addition, a discrepancy was identified in the allocation ratio used to calculate the domestic and Australian CTM, resulting in an understatement of domestic and Australian costs. **Resolution:** Guangdong Kete agreed to revise its CTM to address the identified variances and misallocation of costs. Revised CTM listings (both domestic and Australian) were subsequently submitted, incorporating the appropriate allocation of the variances and revised allocation ratios.

4.2.3 Subsidies

Material revision 14: Update to the total company turnover for all products

Description: The I-1 (company turnover) originally submitted by Guangdong Kete included an amount calculated for total company value on the domestic market during the investigation period. **Resolution:** The team identified that the reported total company value during the investigation period, was based on a calculation for the Australian market only. Guangdong Kete agreed to update the volume for the domestic market during this period to the respective volume of all products, rather than using the Australian volume amount.

Material revision 15: Update to grants listing to include R&D deduction from tax return

Description: The team identified an additional deduction amount in Kete's 2024 financial year tax return. This included deductions for personal expenses, direct input costs and depreciation, as well as a number of R&D projects eligible for additional deductions. **Resolution:** The team confirmed the total deduction amount with Guangdong Kete, who provided a detailed breakdown form supporting the R&D deductions claimed in the tax return. The deduction amount was subsequently included in the subsidy programs list.

4.3 Types of goods produced or sold in the submitted information

4.3.1 Model control code compliance and amendments

The sales and costs data Guangdong Guangdong Kete submitted complies with the model control code (MCC) structure detailed in ADN 2025/115.

Following a comparison of the prices of the various models of the goods, the verification team recommends that an MCC structure not be utilised and projects are used for the purposes of this verification or for the calculation of the dumping margin.

4.4 Corporate information

4.4.1 Company information

Guangdong Kete Facadetech Co., Ltd, previously known as Foshan Kete Aluminium Products Co., Ltd was established in 2003 and provides integrated services covering engineering design and certification, manufacturing, supply, and delivery of aluminium curtain wall and window wall systems.

The company operates across the domestic Chinese market and internationally, exporting to Australia, New Zealand, Southeast Asia, and other overseas markets. As at May 2026, there are 300 staff members at Guangdong Kete, including a professional management team with more than 80 persons.

4.4.2 Related companies

The commission examined the relationships between Guangdong Kete and the parties involved in it producing or selling the goods.

4.4.2.1 Related suppliers

The commission found that Guangdong Kete purchased raw materials, aluminium extrusions and glass from related suppliers. The commission notes that the purchases of aluminium extrusions from related suppliers, represented a small percentage of aluminium extrusions purchased by Guangdong Kete during the period of investigation. Further to this, purchases of glass from related suppliers was a comparable price to purchases from unrelated suppliers.

4.4.2.2 Related customers

The commission found that Guangdong Kete sell a small percentage of like goods to related customers on the domestic market.

4.5 Method used to verify information

4.5.1 Sales completeness and relevance

The commission:

1. Reconciled the tax listing provided in the REQ for the period of investigation to the tax listing generated live during verification and with reconciliation to the GUC reported by Kete.

4.5.2 Cost to make completeness and relevance

The commission:

1. Reconciled the cost of goods sold for 2024 financial year to the audited financial statements and trial balance during the pre-verification stage of the verification.
2. Reconciled the variance amount identified by case team.
3. Reconciled the source documentation provided by the exporter that was the source of the upwards cost spreadsheet.

4.5.3 Selling, general and administrative expense completeness and relevance

The commission:

1. Identified an error in the SG&A calculation and had the Guangdong Kete resubmit their SG&A with correct formulas.
2. Verified a specific SG&A account was correctly allocated to the B-2 Australian sales listing
3. Reviewed selected accounts of the SG&A listing to ascertain whether these were relevant for the domestic SG&A calculation.

4.5.4 Subsidies completeness and relevance

The commission identified the following subsidy types:

1. financial grants
2. tax benefits

4.5.5 Cost allocation method

Table 6 outlines how the commission allocated each cost component.

Cost component	Allocation method applied
Raw materials	Raw materials are allocated based on the project and actual costs, proportioned monthly.
Direct labour	Labour is allocated at the end of month, by projects, proportioned by the total SQM amount produced by each project.
Manufacturing overheads	Manufacturing overheads are allocated at the end of month, by projects, proportioned by the total SQM amount produced by each project.

Table 6 Cost allocation method

4.5.6 Sales volume unit of measure

Table 7 outlines how the commission verified unit of measure reported for sales volume.

Sales market	Assessment
Australia	The commission confirmed that the quantities listed in the Australian sales listing reported by Guangdong Kete at B-2 of its amended questionnaire response (per the exceptions) reflects the square meter of the goods sold. For the purposes of calculating a dumping margin, the commission has relied on the verified square meter amount provided by Guangdong Kete.
Domestic	The commission confirmed that the quantities listed in the domestic sales listing reported by Guangdong Kete at D-2 of its amended questionnaire response (per the exceptions) reflects the square meter of the goods sold. For the purposes of calculating a dumping margin, the commission has relied on the verified square meter amount provided by Guangdong Kete.

Table 7 Sale volume unit of measure assessment

5 APPENDICES AND ATTACHMENTS

Confidential attachment 1: Verification work program
Confidential appendix 1: Export price
Confidential appendix 2: Cost to make and sell
Confidential appendix 3: Subsidy margin
Non-confidential appendix 1: General definitions and verification method

NON-CONFIDENTIAL APPENDIX 1: GENERAL DEFINITIONS AND VERIFICATION METHOD

What are variable factors?

Variable factors are numerical values that the commission uses to calculate the levels of dumping or countervailable subsidy. By verifying a company's data, the commission aims to set accurate variable factors and accurately calculate the level of dumping or countervailable subsidy.

The commission has explained some concepts relating to variable factors. These explanations are in simple terms and may not reflect the full, technical definitions.

Goods

The goods exported into Australia are **Australian export goods** or the **goods under consideration**.

Goods that are the same or similar to Australian export goods are **like goods**.

Variable factors

Dumping occurs if the price of Australian export goods (the **export price**) is less than the equivalent price of like goods in an exporter's domestic market (the **normal value**).

The **amount of dumping** is the difference between a normal value and the corresponding export price – that is, the normal value minus the export price.

A **subsidy** is a financial contribution, income support or price support, from a China of export Government, public body or a private body being directed by the Government or public body that confers a benefit to Australian export goods.

The Australian government can cancel out – that is, **countervail** – the effect of a subsidy, if that subsidy is specific to Australian export goods. In other words, a subsidy specific to Australian export goods is a **countervailable subsidy**.

The minimum export price to prevent material injury to an Australian industry is the **non-injurious price**. The commission typically relies on information from Australian industry and other sources to calculate this price, which is beyond the scope of this verification. The commission has therefore not calculated a non-injurious price in this report.

Margins calculated using variable factors

A **dumping margin** is the rate of dumping compared to the export price.

A **subsidy margin** is the rate of countervailable subsidy attributable to Australian export goods.

Export price method

Section 269TAB lists different ways to calculate an export price based on the facts available.

The commission considers these questions, among others, before calculating an export price:

- Did the verified company sell goods for Australian export?
- Who is the exporter?
- Who is the importer?
- Did the exporter sell to the importer at arm's length?

In this chapter, the commission summarises its findings about facts that affect how to calculate an export price.

Who is the exporter method

The commission generally identifies an **exporter** as a company, located in the China of export, who is a principal company involved in an Australian export goods transaction. At least one of the following generally also applies for a company to be an exporter:

- the company knowingly transferred the goods to its own vehicle, or to a freight company, to deliver the goods to Australia
- at the time the goods shipped, the company owned or previously owned the goods.

To identify the exporter, the commission typically relies on information about Australian export transactions from stakeholders and Australian Border Force.

Who is the importer method

An **importer** is the beneficial owner of goods at the time of import. The beneficial owner may differ from the listed or nominal owner of the goods.

For example, a parent company can have direct control over a subsidiary company's assets and decisions. If that parent company lists its subsidiary company as the owner of goods at the time of import, the commission would find that parent company is the importer because it beneficially owns the goods.

To identify the importer, the commission typically relies on information about Australian export transactions provided by stakeholders and Australian Border Force.

Normal value method

Section 269TAC lists different ways to calculate a normal value based on the facts available.

The commission considers these questions, among others, before calculating a normal value:

- Did the verified company, or a party related to the verified company, sell like goods domestically?
- Were there any domestic sales of like goods?
- Was there a low volume of domestic like goods sales?
- Were the domestic like goods sales at arm's length?
- Does any component of the exporter's costs, or producer's costs, not reflect competitive market costs?
- Were the domestic like goods sales in the ordinary course of trade?
- Does the normal value require adjustments to properly compare it to the export price?

Why the commission assesses production records

The commission assesses if a company's production cost records reasonably reflect competitive market costs as required by Regulation 43(2) before selecting which method to recommend for setting a normal value under section 269TAC.

The commission assesses production cost records through methods including:

- analysing transactions for materials or services supplied by a related party to see if they reflect other costs in the market
- considering if the domestic China has generally competitive, or non-competitive, costs for certain materials or services.

If the commission finds that the production cost records reasonably reflect competitive market costs, the commission must use the recorded costs to calculate the cost of production. If the commission finds that production cost records do not reasonably reflect competitive market costs in some part, then the commission may use other information if appropriate to adjust that part of the costs before setting a normal value.

Ordinary course of trade method

The commission assesses if domestic like goods sold in the ordinary course of trade before selecting which method to recommend for setting a normal value under section 269TAC.

Section 269TAAD sets out which sales are in the ordinary course of trade. Under this section, a domestic like goods sale is **not** in the ordinary course of trade if the conditions below apply to the sale:

- the sale is **unprofitable in substantial quantities** over an extended period
- the sale is **unlikely to be recoverable** within a reasonable period.

The commission typically uses this method to assess each step of identifying a sale not in the ordinary course of trade.

1. A sale is **unprofitable** if its unit price is less than the corresponding unit cost to make and sell in the sales month or sales quarter
2. All sales for a model are unprofitable **in substantial quantities** if the volume of unprofitable sales is 20% or more of the total volume of sales
3. A sale is **unlikely to be recoverable** if its unit price is less than the corresponding unit cost to make and sell for the entire reasonable period.

The commission typically sets both the 'extended period' and 'reasonable period' under section 269TAAD as the inquiry, investigation or review period for a case.

Low volume of relevant domestic sales method

Under section 269TAC(1), the commission must set a normal value using a sufficient volume of domestic like goods.

If the commission uses a low volume of domestic like goods to set a normal value, then the normal value does not properly compare to the export price when measuring the level of dumping and the commission cannot set a normal value under section 269TAC(1).

To assess if there is a large enough volume of domestic sales to set a normal value under section 269TAC(1), the commission must compare the domestic and Australian export sales volumes for an exporter. If the domestic sales volume is less than 5% of the Australian export sales volume, the commission must also assess if the domestic sales volume is still large enough to use in a normal value that properly compares to the export price.

The commission uses this method to compare domestic and Australian export sales volumes both overall and for each model sold as Australian export goods. When comparing sales volumes for an individual model, the commission may use a surrogate domestic sales model to calculate normal value for the Australian export sales model.

Section 269TAC(14) sets this sufficiency test for dumping investigation cases. The commission also uses this sufficiency test when setting a normal value in other case types.

The figure below summarises the possible outcomes when assessing domestic sales volumes to use in a normal value set under section 269TAC(1).

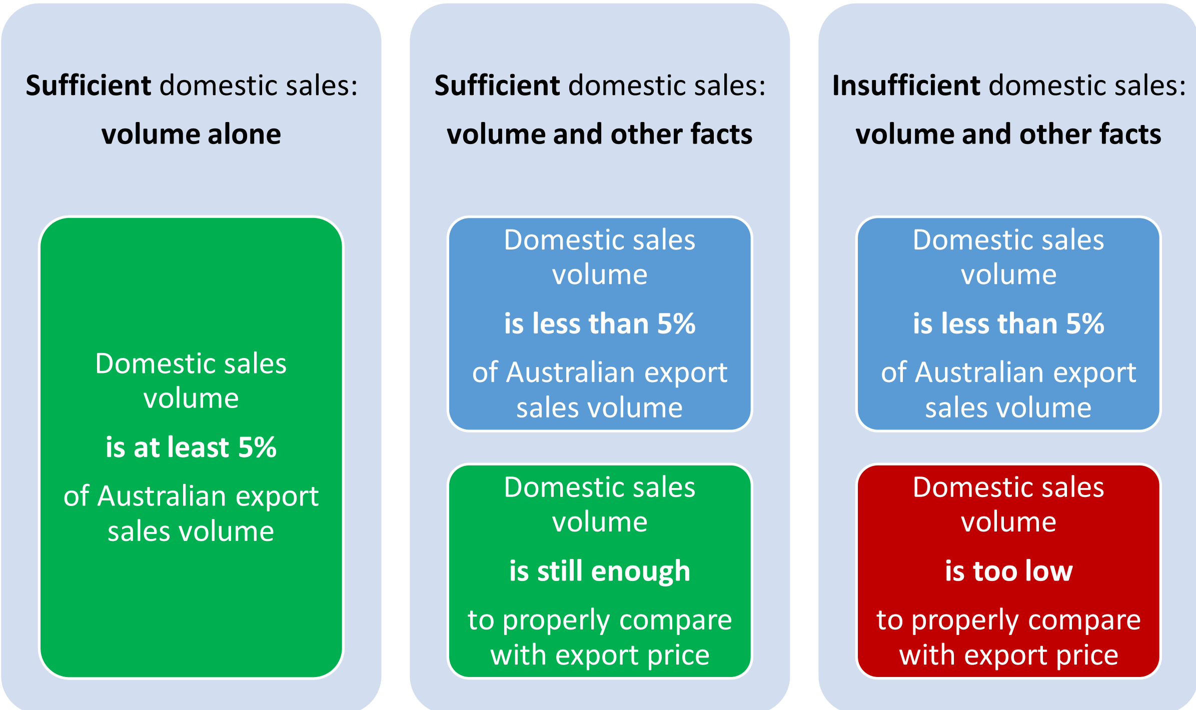

Figure 1 Possible findings about domestic sales volumes for section 269TAC(1) normal value

Method to verify information

A valid exporter questionnaire response includes data listings about sales, costs and subsidy programs (where relevant).

Before relying on submitted data listings, the commission first verifies if these listings are:

- **complete**, as in, including all the relevant data
- **relevant**, as in, including only relevant data
- **accurate**, as in, including only correct data.

In practice, the commission typically verifies data listings as complete and relevant at the same time.

ADN 2016/30 describes the commission's standard procedure to verify and validate stakeholder information.

General method to verify information as complete and relevant

The commission verifies data listings as complete and relevant by reconciling each listing's sum total up to audited financial records.

The commission typically reconciles a listing to audited records incrementally. The commission typically links a listing subtotal to management accounts, then links those management accounts to the audited records.

Figure 2 outlines how the commission verifies different topics as complete and relevant.

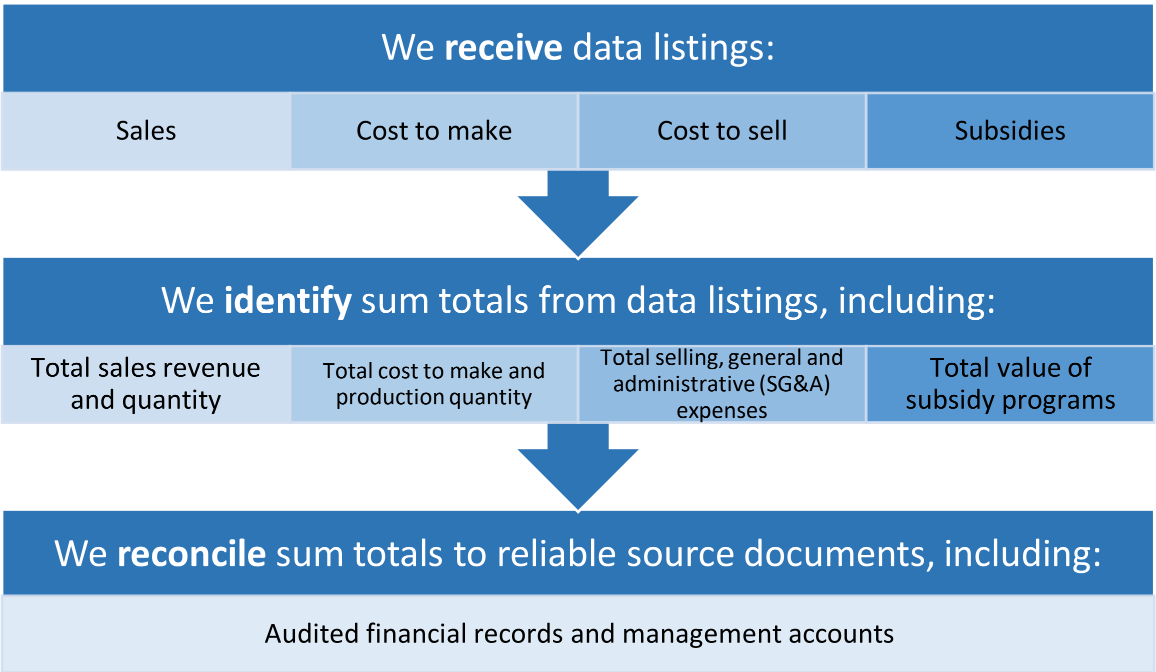

Figure 2 How the commission verifies data as complete and relevant

General method to verify information as accurate

To verify the listings are accurate, the commission typically reconciles key data from a selection of transactions in the listings down to source documents.

Figure 3 outlines how the commission verifies different topics as accurate.

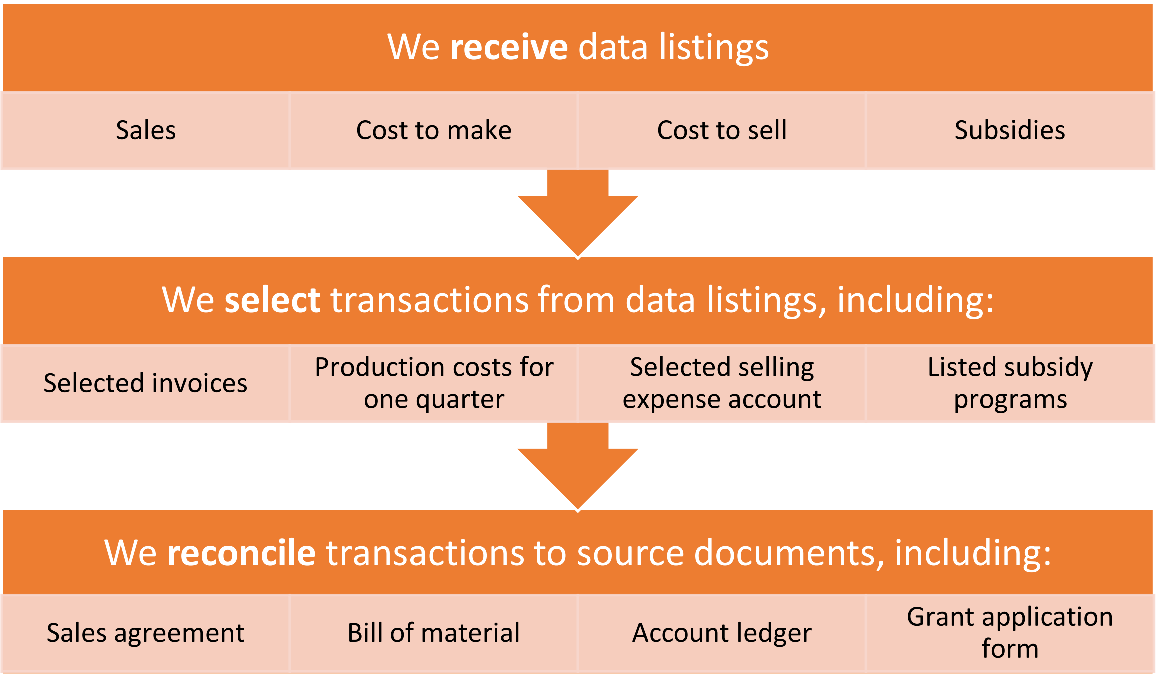

Figure 3 How the commission verifies data as accurate