PUBLIC RECORD

25 September 2026

The Director – Investigations
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Investigation No. 691 – Aluminium windows and doors exported from the People's Republic of China

Dear Director,

1. This submission is made on behalf of Broad Windows and Doors and Curtain Wall System Co., Ltd (Broad). It submits a special audit report on the record price of the aluminium windows and doors Broad exported to Australia through its two Hong Kong related entities between 1 July 2024 and 30 June 2025 (the audit report).

2. In its submission of 3 September 2026 on the Commission's verification findings, Broad said that it wished to provide, ahead of the SEF, "a further submission, together with any supporting materials, reconciliations, source documents and explanations necessary to address any remaining concerns identified by the Commission". This submission and the audit report are provided for that purpose.

3. The audit report contains Broad's commercially sensitive sales data. It is provided as **Confidential Attachment 1**, with the Chinese original as **Confidential Attachment 2**.

The Audit Report

4. The audit report was prepared by Shenzhen Jiu'an Certified Public Accountants (Special General Partnership), Guangzhou Branch, under engagement number [2026]00025. It records that the work was carried out under the "Chinese Standards on Auditing for Certified Public Accountants", and that the procedures performed included "verification of relevant documents, calculations, and analytical reviews".[1] Its annexes include the three Australian sales tables Broad prepared for the investigation, the exchange rates applied, Broad's financial statements for 2024 and 2025, and the financial statements and income statement reports of the two Hong Kong related entities.

5. The audit report records two features of Broad's business that are relevant on how its data should be read. Broad works on a project basis. Each project is governed by a single contract, and the price is set per square metre rather than by window model. Broad also has no domestic sales. Its products are exported, mainly to Australia, either through its

[1] Special audit report on the unit ex-factory prices of aluminium doors and windows exported by Broad through its Hong Kong related entities to Australia, 1 July 2024 to 30 June 2025, Shenzhen Jiu'an Certified Public Accountants (Special General Partnership), Guangzhou Branch, No. [2026]00025, p 1.

two Hong Kong related entities or through independent traders in China. That is consistent with the Commission's own finding that "there were no domestic sales of the goods during the period of investigation".

6. For goods sold to Australian customers through the Hong Kong related entities during the investigation period, the audit report finds the following:

   - [redacted] projects, covered by [redacted] commercial invoices;
   - a gross invoice value of AUD [redacted];
   - an FOB value of AUD [redacted];
   - an ex-factory value of AUD [redacted];
   - a total quantity of [redacted] square metres, calculated from the packing lists; and
   - an ex-factory price of AUD [redacted] per square metre.

Verification findings

7. Export price. The Commission found that "[f]or all transactions, the commission considers the Australian customer is the importer of the Australian export goods". The audit report starts from the prices those Australian importers paid, as recorded in the table of sales by the Hong Kong related entities to Australian customers. It then deducts the costs incurred after the goods left the factory to arrive at the ex-factory price. That figure does not depend on the price at which Broad sold to its Hong Kong related entities.

8. That is the price the verification team could not establish. Its concern was that Broad had reported the related entities' selling price rather than its own price to them, and that the difference between the two could not be tied to Broad's accounting records. Broad had described that difference as [redacted]%, and the verification team found that it ranged from [redacted]% to [redacted]%. As the audited ex-factory price is worked back from the price paid by the independent Australian importers, the related party price, and any variation in it, plays no part in the result.

9. Sales through independent traders. For goods sold through independent traders in China, the Commission has already found that "Broad sold the Australian export goods at arm's length" and that "Broad sold goods at similar prices to all unrelated customers". The audit report notes that Broad cannot see the prices those traders agreed with their Australian customers. Broad's own invoice prices to the traders are set out in the table annexed to the audit report for that channel.

10. Quantity. The verification team was unable to accept the quantities in Broad's revised Australian sales listing. At verification Broad confirmed that "the packing list is the most accurate way to report the correct quantity". The audit report calculates the quantity for the Hong Kong channel from the packing lists for each shipment, and reports it as [redacted] square metres.

11. Profitability. The audit report also reaches three conclusions about the financial position of Broad and its Hong Kong related entities. It finds that Broad "reported profits in both 2024 and 2025, and has remained in a profitable position throughout both years". It finds that the two Hong Kong related entities reported profits for the financial year 2024/25 and for the investigation period, and that "both were in a profitable position". It also records that Broad and the Hong Kong related entities "have not committed any tax-related violations". The two calendar years covered by the conclusions span the whole investigation period. Given that Broad has no domestic sales, the profit it reports in those years is earned on its exports, most of which were made to Australia.

12. Cost records. The conclusions are also relevant to the reliability of Broad's costs. The profit shown in Broad's financial statements is its revenue less the costs recorded in the same accounts. The Commission itself "reconciled the cost of goods sold for 2025 financial year to the audited financial statements and trial balance", reconciled the cost of goods sold for the investigation period to the trial balance, and "verified the cost to make for the investigation period based on the accounting system".

13. The completeness of Broad's total costs is therefore supported by the Commission's own reconciliations. Those costs are recorded in accounts that show Broad trading profitably throughout the investigation period, kept by a business the audit report finds has committed no tax-related violation. The profitability of the Hong Kong related entities over the same period also gives no indication that any cost of making the goods was carried outside Broad's own accounts. What the verification team could not test was how those total costs were allocated across products and months in the cost to make spreadsheet. That is a question of how a verified total is divided, not of whether the total is complete. It is the question Broad has offered to resolve by producing the allocation workbooks and source data, and by making the relevant staff available.

Audit report findings are relevant information

14. The Anti-Dumping Agreement provides:

> "All information which is verifiable, which is appropriately submitted so that it can be used in the investigation without undue difficulties, which is supplied in a timely fashion, and, where applicable, which is supplied in a medium or computer language requested by the authorities, should be taken into account when determinations are made."[2]

15. The audit report meets that description. It is supplied before the SEF. It is built from the same sales tables the Commission holds, and each figure can be traced to the commercial invoices and packing lists behind it.

16. Broad asks the Commission to:

- have regard to the audit report into preparing its preliminary findings for the SEF;

[2] Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994, Annex II, paragraph 3.

- verify the audit report against the sales listings and source documents it holds, by desk verification or otherwise, where it considers that necessary;
- for goods sold through the Hong Kong related entities, ascertain the export price from the prices paid by the Australian importers, as set out in the audit report;
- for goods sold through independent traders, rely on Broad's invoice prices to those traders, which the Commission has found to be at arm's length; and
- use the packing list quantities set out in the audit report.

17. Broad and its auditors are available to answer any question the Commission has about the audit report, and to provide any document referred to in it. Broad reserves its right to make further submissions, including in response to the SEF.

Yours faithfully,

Broad Windows and Doors and Curtain Wall System Co., Ltd