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Anti-Dumping Commission

Exporter Questionnaire

Accelerated Review No. 492

PRODUCT: Zinc coated (galvanised) steel

FROM: The People's Republic of China

REVIEW PERIOD: 1 JULY 2017 TO 30 JUNE 2018

RESPONSE DUE BY: 8 OCTOBER 2018

Important note: The timeliness of your response is important. Please refer below for

more information.

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Goods under consideration

The goods subject to anti-dumping measures, in the form of a dumping duty notice and a countervailing duty notice, are:

"flat rolled products of iron and non-alloy steel, of a width less than 600mm and, equal to or greater than 600mm, plated or coated with zinc; and

flat rolled products of alloyed steel, of a width less than 600mm and, equal to or greater than 600mm, plated or coated with zinc exported from:

- China by Angang Steel Co, Ltd or Benxi Iron and Steel (Group) International Economic & Trading Co., or
- Taiwan by Yieh Phui Enterprise Co., Ltd."

Galvanised steel of any width is included.

Additional information in relation to the goods

Zinc coated (galvanized) steel is commonly referred to as galvanised steel. The amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m2) with the prefix being Z (Zinc) or ZF (Zinc converted to a Zinc/Iron alloy coating). Common coating masses used for zinc coating are: Z350, Z275, Z200, Z100, and for zinc/iron alloy coating are: ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.

Trade and other names often used to describe galvanised steel include:

- "GALVABOND®" steel;
- "ZINCFORM®" steel:
- "GALVASPAN®" steel;
- "ZINCHITEN®" steel;
- "ZINCANNEAL"steel;
- "ZINCSEAL"steel;
- Galv:
- GI:
- Hot Dip Zinc coated steel;
- Hot Dip Zinc/iron alloy coated steel; and
- Galvanneal.

Product treatment

Surface treatments can include but are not limited to; passivated or not passivated (often referred to as chromated or unchromated), oiled or not oiled, skin passed or not skin passed, phosphated or not phosphated (for zinc iron alloy coated steel only).

Excluded goods

Painted galvanised steel, pre-painted galvanised steel, electro-galvanised plate steel and corrugated galvanised steel are not covered by the dumping duty notice.

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Tariff classification of the goods

Goods identified as galvanised steel, as per the description above, are classified to the following tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995*:

- 7210.49.00 statistical code 55, 56, 57 and 58;
- 7212.30.00 statistical code 61;
- 7225.92.00* statistical code 38*; and
- 7225.99.00* statistical code 71*.
- *The last two tariff subheadings only apply to the following exporters/suppliers:
 - Angang.
 - Benxi Iron and Steel (Group) International Economic & Trading Co.; and
 - Yieh Phui.

BACKGROUND AND GENERAL INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the Commission) is responsible for conducting accelerated reviews of dumping notices or countervailing duty notices for certain exporters under Part XVB, Division 6 of the *Customs Act 1901* (the Act). Your company, Zhejiang Huada New Materials Co., Ltd applied for an accelerated review under Division 6 in relation to zinc coated (galvanized) steel exported to Australia from the People's Republic of China, the Republic of Korea and Taiwan.

This questionnaire seeks information that the Commission will use to determine normal values and export prices over the review period of 1 July 2017 to 30 June 2018 (hereinafter referred to as 'the review period').

The Commission's review will be carried out under the provisions of the Part XVB of the *Customs Act 1901* (the Act).

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 you uncooperative and terminate the review under subsection 269ZE(3) of the Act. In that case, the Commission may determine that the original dumping duty notice remain unchanged.

It is in your interest, therefore, to provide a complete and accurate submission, capable of verification.

Due date for response

Manufacturers and exporters are requested to respond to this questionnaire and return it to the Commission within the timeframes specified on the cover page.

The Commissioner must consider the direction from the then Minister for Industry, Innovation and Science as set out in the *Customs (Extensions of Time and Non-cooperation) Direction 2015* (the Direction). This Direction sets out the particular considerations that the Commissioner must take into account when:

- deciding whether a longer period is reasonably required or practicable under subsection 269TC(6) and 269TC(9) of the Act, or considering whether to allow any interested party a longer period to give any response;
- considering an insufficient response from an interested party;
- determining whether to have regard to a late response;
- determining whether an exporter is an uncooperative exporter;
- determining whether or not an entity is a non-cooperative entity for the purposes of section 269TAACA; and

determining whether an entity has significantly impeded a case.

The full text of the Direction and the accompanying explanatory statement is available on the Comlaw website at www.comlaw.gov.au. This and other reforms to Australia's anti-dumping system are explained in Anti-Dumping Notice 2015/129, available on the Commission's website at www.adcommission.gov.au.

Confidential and non-confidential submissions

You are required to lodge one confidential version (for official use only) and one non-confidential version (for public record) of your submission by the due date.

Please ensure that *each page* of information you provide is clearly marked either "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD".

All information provided to the Commission in confidence will be treated accordingly. The non-confidential version of your submission will be placed on the public record.

Please note, Australia's anti-dumping and countervailing legislation requires that to the extent that information given to the Commission is claimed to be confidential or whose publication would adversely affect a business or commercial interest, the person giving the information must ensure that a summary of that information contains sufficient detail to allow a reasonable understanding of the substance of the information, but does not breach confidentiality nor adversely affect those interests.

The legislation allows that 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. However, such a summary would add considerably to an interested party's understanding of information contained in a document.

As provided for in Australia's anti-dumping and countervailing legislation, all submissions are required to have a bracketed explanation of deleted or blacked out information for the non-confidential version of the submission. Note that if such an explanation is not provided, the Commission may disregard the information in the submission. An example of a statement to accompany deleted/blacked out text is:

[explanation of cost allocation through the divisions].

If, for some reason, you cannot produce a non-confidential summary, please contact the investigation case manager.

Exporter's declaration

At section I, you are required to make a declaration that the information contained in your submission is complete and correct.

You must return a signed declaration with your response to the questionnaire.

Verification of the information that you supply

The Commission will seek to verify the information provided in your submission. Where required, a verification visit may be required. The purpose of the visit is to verify the information submitted in response to this questionnaire. It 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 complete and accurate.

Verification visits take several days. We will want to examine in detail your company's records in respect of the goods and will ask for copies of documents relating to the manufacture and sale of the goods. We will need to consult with your staff, particularly your financial controller (or accountant) and your domestic and export sales people. We may also need to see your factory, in which case we will need to consult with your operational managers.

After gathering the information we will prepare a report of the visit. We will provide you with a draft of the report and then respond to any questions you have. We will ask you to prepare a non-confidential copy of the report for the public record.

If you do not export the goods

Depending on the arrangement for sale of the goods to Australia through an intermediary, the Commission will have to determine the exporter of the goods for the purpose of this review.

If you are not the exporter of the goods, this may mean that you are not entitled to a review.

Outline of information required by this questionnaire

Section A General information relating to your company including financial reports. **Section B** A complete list of your company's exports to Australia over the review period. Section C A list of goods sold on the domestic market of the country of export (like goods) that may be compared to the goods under consideration (the goods). Section D A detailed list of all of your company's sales of like goods in your domestic market. Section E Information to allow a fair comparison between export and domestic prices. Section F Information in relation to your company's exports of like goods to countries other than Australia. Section G Costs to make and sell, for exports to Australia and for the domestic market. Subsidies. Section H Section I Your declaration. Section J A checklist.

Appendix 1 A glossary of terms used in this questionnaire

Some general instructions for preparing your response

- When answering the questionnaire please carefully read all instructions. The Commission requires a response to *all* sections of this questionnaire. Please provide an explanation if a question is not relevant to your situation.
- Answer questions in the order presented in the questionnaire. Please ensure that information submitted conforms to the requested format and is clearly labelled. Please repeat the question to which you are responding and place your answer below it.
- Identify source documents and advise where they are kept. During on-site verification you should be prepared to substantiate all the information you have submitted. Every part of the response should be traceable to company documents that are used in the ordinary course of business.
- We recommend that you retain all work sheets used in answering the questionnaire, in particular those linking the information supplied with management and accounting records. This will help us to verify the information.
- Clearly identify all units of measurement and currencies used. Apply the same measurement consistently throughout your response to the questionnaire.

Instructions on providing electronic data

- It is important that information is submitted in electronic format.
- Electronic data should be emailed or submitted on a CD-ROM. The
 Commission can also take receipt of data via its web based file sharing facility. Please contact the case manager for further details.
- The data must be created as spreadsheet files, preferably in Microsoft Excel, or alternatively in an Excel compatible format (for example, Excel can normally access data in Dbase or as an ASCII file).
- The Excel files must be compatible to the USA version.
- If you cannot present electronic data in the requested format contact the investigation case officer as soon as possible.

Further information

Before you respond to the questionnaire you should read all the documentation enclosed. We also advise that you read the attached glossary of terms.

If you require further assistance, or you are having difficulties completing your questionnaire, please contact the case manager.

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SECTION A COMPANY STRUCTURE AND OPERATIONS

This section requests information relating to company details and financial reports.

A-1 Identity and communication

Please nominate a person within your company who can be contacted for the purposes of this investigation:

Head Office:

Name:Xu Yingjia

Position in the company: International Sales Manager

Address: DAYUAN INDUSTRIAL FUNCTION ZONE, FUYANG CITY,

ZHEJIANG, CHINA

Telephone: []

Facsimile number: []

E-mail address of contact person: []

Factory: The same as the Head Office

Address:

Telephone:

Facsimile number:

E-mail address of contact person:

A-2 Representative of the company for the purpose of investigation

If you wish to appoint a representative to assist you in this investigation, provide the following details:

Name: Wang Jiesan

Address: 16th Floor, Suite A, China Technology Exchange Building, No. 66

North 4th Ring West Road, Haidian District, Beijing

Telephone: 0086-10-62684688

Facsimile/Telex number: 0086-10-62684288

E-mail address of contact person: andywangjiesan@163.com

Note that in nominating a representative, the Commission will assume that confidential material relating to your company in this investigation may be freely released to, or discussed with, that representative.

A-3 Company information

1. What is the legal name of your business? What kind of entity is it (eg. company, partnership, sole trader)? Please provide details of any other business names that you use to export and/or sell goods.

Response:

The legal name of our company is Zhejiang Huada New Materials Co., Ltd (hereinafter referred to as " Huada" or "the Company") and the Company is a limited company. There is no other business name for the Company.

2. Who are the owners and/or principal shareholders? Provide details of shareholding percentages for joint owners and/or principal shareholders. (List all shareholders 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).

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

3. If your company is a subsidiary of another company, list the principal shareholders of that company.

Response:

The Company is a subsidiary of Zhejiang Huada Group Co., Ltd., whose shareholders are [].

4. If your parent company is a subsidiary of another company, list the principal shareholders of that company.

Response:

Not applicable since the shareholders of our parent company are natural persons.

5. Provide a diagram showing all associated or affiliated companies and your company's place within that corporate structure.

Response:

Please see Attachment A-3.5-Diagram of all affiliated companies.

6. Are any management fees/corporate allocations charged to your company by your parent or related company?

Response:

There is no such management fees/corporate allocation.

7. Describe the nature of your company's business. Explain whether you are a producer or manufacturer, distributor, trading company, etc.

Response:

The Company is a producer.

- 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:
 - produce or manufacture
 - sell in the domestic market
 - export to Australia, and
 - export to countries other than Australia.

Response:

The Company performs all functions of manufacturing and selling in the domestic market and export to other countries.

9. Provide your company's internal organisation chart. Describe the functions performed by each group within the organisation.

Response:

Please see Attachment A-3.9-Internal organisation chart.

10. Provide a copy of your most recent annual report together with any relevant brochures or pamphlets on your business activities.

Response:

Please see Attachment A-3.10-Brochure.

A-4 General accounting/administration information

1. Indicate your accounting period.

Response:

From 1January to 31 Decmber.

2. Indicate the address where the company's financial records are held.

Response:

The financial records are held at the head office of the Company.

- 3. Please provide the following financial documents for the two most recently completed financial years plus all subsequent monthly, quarterly or half yearly statements:
 - chart of accounts:
 - audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);
 - internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods under consideration.

These documents should relate to:

- the division or section/s of your business responsible for the production and sale of the goods under consideration, and
- the company.

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

4. If you are not required to have the accounts audited, provide the unaudited financial statements for the two most recently completed financial years, together with your taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

Response:

Not applicable since Huada's accounts were audited.

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

Response:

Not applicable since Huada's accounting practices are accordance with the generally accepted accounting principles in China.

6. Describe:

The significant accounting policies that govern your system of accounting, in particular:

 the method of valuation for raw material, work-in-process, and finished goods inventories (eg last in first out –LIFO, first in first out- FIFO, weighted average):

Response:

The method adopted by Huada was weighted average.

- costing methods, including the method (eg by tonnes, units, revenue, direct costs etc) of allocating costs shared with other goods or processes (such as front office cost, infrastructure cost etc);

Response:

The expenditure of production shall be aggregated by production workshop, i.e. acid-pickling workshop, cold-rolling workshop, galvanizing workshop, color coating workshop. Direct expenditure shall be booked into cost of production and indirect expenditure shall be allocated among products by a specific distribution coefficient.

 valuation methods for damaged or sub-standard goods generated at the various stages of production;

Response:

There are steel scrap and zinc slag in the process of production of galvanized steel and color coating steel.

valuation methods for scrap, by products, or joint products;

Response:

There is no by-products. Please also see the answer of above question.

- valuation and revaluation methods for fixed assets;

Response:

Fixed assets are initially measured at actual cost from purchase and depreciation will be made from the following month with straight line method.

- average useful life for each class of production equipment and depreciation method and rate used for each:

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

- treatment of foreign exchange gains and losses arising from transactions; **Response:**

At the time of initial confirmation, the exchange rate on the first day in the month the transaction taking place is used for converting to RMB amount in the foreign currency transaction. On the balance sheet date, spot exchange rate on the balance sheet date is used for convention in the monetary items of foreign currency.

- treatment of foreign exchange gains/losses arising from the translation of balance sheet items:

Response

The balance of exchange arisen from different exchange rate shall be charged into current profits and losses.

inclusion of general expenses and/or interest;

Response:

Loan expenses such as interest and foreign exchange differences from loans for purchasing fixed assets are capitalized and calculated into that asset's cost, at the time when asset expenditure and loan expenses incur and when purchasing or building activities start as a necessity to make that asset reach expected usable condition. Expenses of other loans are accounted into current period's income statement.

provisions for bad or doubtful debts;

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

expenses for idle equipment and/or plant shut-downs;

Response:

Not applicable.

costs of plant closure;

Response:

Not applicable.

restructuring costs;

Response:

Not applicable.

by-products and scrap materials resulting from your company's production process; and

Response:

There are no by-products. The scrap materials are steel scrap.

effects of inflation on financial statement information.

Response:

Not applicable.

7. In the event that any of the accounting methods used by your company have changed over the last two years provide an explanation of the changes, the date of change, and the reasons for it.

Response:

Not applicable.

A-5 Income statement

Please fill in the following table on the spreadsheet named "A5 – Income statement".

The table requires information concerning all products produced and for the goods under consideration ('goods under consideration' (the goods) as defined in the Glossary of Terms in the appendix to this form). You should explain how costs have been allocated.

Note: if your financial information does not permit you to present information in accordance with this table please present the information in a form that closely matches the table.

This information will be used to verify the completeness of cost data that you provide in Section G. If, because of your company's structure, the allocations would not be helpful in this process, please explain why this is the case.

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

A-6 Sales

Please fill in the following table in the spreadsheet named "A6 - Turnover".

State your company's net turnover (after returns and all discounts), and free of duties and taxes. Use the currency in which your accounts are kept, in the following format:

This information will be used to verify the cost allocations to the goods under consideration in Section G.

Also, you should be prepared to demonstrate that sales data shown for the goods is a complete record by linking total sales of these goods to relevant financial statements. **Response:**

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

SECTION B SALES TO AUSTRALIA (EXPORT PRICE)

This section requests information concerning your export practices and prices to Australia. You should include costs incurred beyond ex-factory. Export prices are usually assessed at FOB point, but the Commission may also compare prices at the ex factory (EXW) level.

You should report prices of **all** goods under consideration (the goods) **shipped** to Australia during the review period.

The invoice date will normally be taken to be the date of sale. If you consider:

the sale date is not the invoice date (see 'date of sale' column in question B4 below) and;

an alternative date should be used when comparing export and domestic prices you **must** provide information in section D on domestic selling prices for a matching period - even if doing so means that such domestic sales data predates the commencement of the review period.

Response:

SECTION C EXPORTED GOODS & LIKE GOODS

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

Response:

Not applicable since Huada is a new exporter and there was no export sales to Australia until now. Anyway, the product the Company is going to export Australia shall be the same to which sold in the domestic market.

C-2 List each type of goods exported to Australia (these types should cover all types listed in spreadsheet "**B4 - Australian sales**" – see section B of this questionnaire).

Response:

Not applicable since Huada is a new exporter and there was no export sales to Australia until now.

- **C-3** If you sell like goods on the domestic market, for each type that your company has exported to Australia during the review period, list the most comparable model(s) sold domestically;
- and provide a detailed explanation of the differences where those goods sold domestically (ie. the like goods – see explanation in glossary) are not identical to goods exported to Australia.

EXPORTED TYPE	DOMESTIC TYPE	IDENTICAL?	DIFFERENCES
Product code of each model of the goods exported to Australia	Product code of comparable model sold on the domestic market of the country of export	If goods are identical indicate "YES". Otherwise "NO"	Where the good exported to Australia is not identical to the like goods, describe the specification differences. If it is impractical to detail specification differences in this table refer to documents which outline differences

Response:

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C-4 Please provide any technical and illustrative material that may be helpful in identifying or classifying the goods that your company sells on the domestic market.

Response:

SECTION D DOMESTIC SALES

This section seeks information about the sales arrangements and prices in the domestic market of the country of export.

<u>All</u> domestic sales made during the review period must be listed transaction by transaction. If there is an extraordinarily large volume of sales data <u>and</u> you are unable to provide the complete listing electronically you **must** contact the case officer **before** completing the questionnaire. If the case officer agrees that it is not possible to obtain a complete listing he or she will consider a method for sampling that meets the Commission requirements. If agreement cannot be reached as to the appropriate method the Commission may not visit your company.

The Commission will normally take the invoice date as being the date of sale in order to determine which sales fall within the review period.

If, in response to question B4 (Sales to Australia, Export Price), you have reported that the date of sale is not the invoice date and you consider that this alternative date should be used when comparing domestic and export prices –

you **must** provide information on domestic selling prices for a matching period - even if doing so means that such domestic sales data predates the commencement of the review period.

If you do not have any domestic sales of like goods you must contact the case officer who will explain the information the Commission requires for determining a normal value using alternative methods.

D-1 Provide:

- a detailed description of your distribution channels to domestic customers, including a diagram if appropriate;
- information concerning the functions/activities performed by each party in the distribution chain; and
- a copy of any agency or distributor agreements, or contracts entered into.

If any of the customers listed are associated with your business, provide details of that association. Describe the effect, if any, that association has upon the price.

Response:

Please see Attachment D-1-Domestic Sales Flowchart.

There is no agency or distributor agreements, or contracts between clients and our company. Two of the clients, Hangzhou Puyin Metal Co., Ltd

- , Hangzhou Puyin Plate Co., Ltd are related to the Company, and the sales price is the same as other companies.
- **D-2** Do your domestic selling prices vary according to the distribution channel identified? If so, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Response:

The distribution channel of domestic sales is divided into trading compnay and end-user. The prices of the same products between trading company and end-user are almost the same.

- **D-3** Explain in detail the sales process, including:
 - the way in which you set the price, receive orders, make delivery, invoice and finally receive payment; and the terms of the sales; and
 - whether price includes the cost of delivery to customer.

If sales are in accordance with price lists, provide copies of the price lists.

Response:

In general, sales department get the offer from clients and send the message to production department. Having the confirmation from the production department, sales department will sign the contract with clients. After receiving the payment from the clients, the Company will deliver the products to the warehouse of clients. The price did not include the cost of delivery since the customer pick up the goods at the warehouse of Huada.

And there is no price list for domestic sales in Huada.

D-4 Prepare a spreadsheet named "**D4 – Domestic sales**"

List **all** sales of like goods made during the review period. Include all of the following information.

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

Costs marked with * are explained in section E-2.

D-5 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-4 above add a column for each item (see "other factors"). For example, certain other selling expenses incurred.

Response: Not applicable.

- **D-6** For each type of commission, discount, rebate, allowance offered on domestic sales of like goods:
 - provide a description; and
 - explain the terms and conditions that must be met by the customer to qualify for payment.

Where the amounts of these discounts, rebates etc are not identified on the sales invoice, explain how you calculated the amounts shown in your response to question D4.

If you have issued credit notes, directly or indirectly to the customers, provide details if the credited amount has **not** been reported as a discount or rebate.

Response: Not applicable.

D-7 Select two domestic sales, in different quarters of the review period, that are at the same level of trade as the export sales. Provide a <u>complete</u> set of documentation for those two sales. (Include, for example, purchase order, order acceptance, commercial invoice, discounts or rebates applicable, credit/debit notes, long or short term contract of sale, inland freight contract, bank documentation showing proof of payment.)

The Commission will select additional sales for verification at the time of our visit.

Response:

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This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

SECTION E FAIR COMPARISON

Section B sought information about the export prices to Australia and Section D sought information about prices on your domestic market for like goods (ie. the normal value).

Where the normal value and the export price are not comparable adjustments may be made. This section informs you of the fair comparison principle and asks you to quantify the amount of any adjustment.

As prices are being compared, the purpose of the adjustments is to eliminate factors that have unequally modified the prices to be compared.

To be able to quantify the level of any adjustment it will usually be necessary to examine cost differences between sales in different markets. The Commission must be satisfied that those costs are likely to have influenced price. In practice, this means that the expense item for which an adjustment is claimed should have a close nexus to the sale. For example, the cost is incurred because of the sale, or because the cost is related to the sale terms and conditions.

Conversely, where there is not a direct relationship between the expense item and the sale a greater burden is placed upon the claimant to demonstrate that prices have been affected, or are likely to have been affected, by the expense item. In the absence of such evidence the Commission may disallow the adjustment.

Where possible, the adjustment should be based upon actual costs incurred when making the relevant sales. However, if such specific expense information is unavailable cost allocations may be considered. In this case, the party making the adjustment claim must demonstrate that the allocation method reasonably estimates costs incurred.

A party seeking an adjustment has the obligation to substantiate the claim by relevant evidence that would allow a full analysis of the circumstances, and the accounting data, relating to the claim.

The review must be completed within strict time limits therefore you must supply information concerning claims for adjustments in a timely manner. Where an exporter has knowledge of the material substantiating an adjustment claim that material is to be available at the time of the verification visit. The Commission will not consider new claims made after the verification visit.

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E-1 Costs associated with export sales

These cost adjustments will relate to your responses made at question B-4, 'Australian sales'

Response:

SECTION F EXPORT SALES TO COUNTRIES OTHER THAN AUSTRALIA (THIRD COUNTRY SALES)

Your response to this part of the questionnaire may be used by the Commission to select sales to a third country that may be suitable for comparison with exports to Australia.

Sales to third countries may be used as the basis for normal value in certain circumstances. The Commission may seek more detailed information on particular third country sales where such sales are likely to be used as the basis for determining normal value.

F-1 Prepare the spreadsheet named "F1 – Third country"

Using the column names and column descriptions below provide a summary of your export sales to countries other than Australia.

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

F-2 Please identify any differences in sales to third countries which may affect their comparison to export sales to Australia.

Response:

Not applicable.

SECTION G COSTING INFORMATION AND CONSTRUCTED VALUE

The information that you supply in response to this section of the questionnaire will be used for various purposes including:

- testing the profitability of sales of like goods on the domestic market;
- determining a constructed normal value of the goods under consideration (the goods) ie of the goods exported to Australia; and
- making certain adjustments to the normal value.

You will need to provide the cost of production of both the exported goods (the goods) and for the like goods sold on the domestic market. You will also need to provide the selling, general, and administration costs relating to goods sold on the domestic market; the finance expenses; and any other expenses (eg. non-operating expenses not included elsewhere) associated with the goods.

In your response please include a worksheet showing how the selling, general, and administration expenses; the finance expenses; and any other expenses have been calculated.

If, in response to question B4 (Sales to Australia, Export Price) you:

- reported that the date of sale is not the invoice date and consider that this alternative date should be used when comparing domestic and export prices, and
- provided information on domestic selling prices for a matching period as required in the introduction to Section D (Domestic Sales)

you must provide cost data over the same period as these sales even if doing so means that such cost data predates the commencement of the review period.

At any verification meeting you must be prepared to reconcile the costs shown to the accounting records used to prepare the financial statements.

G-1. Production process and capacity

1. Describe the production process for the goods. 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 byproducts that result from producing the goods.

Response:

Please see Attachment G-1-Flowchart of production process.

G-2. Provide information about your company's total production in the following table:

Provide this information on a spreadsheet named "G2 - Production".

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

G-3. Cost accounting practices

Outline the management accounting system that you maintain and explain how that cost accounting information is reconciled to your audited financial statements.

Response:

Please see Attachment G-3.1-Flowchart of Accounting System.

Is your company's cost accounting system based on standard (budgeted) costs? State whether standard costs were used in your responses to this questionnaire. If they were state whether all variances (ie differences between standard and actual production costs) have been allocated to the goods - and describe how those variances have been allocated.

Response:

The Company's cost accounting system based on actual cost.

Provide details of any significant or unusual cost variances that occurred during the review period.

Response:

There are no any significant or unusual cost variances that occurred during the review period.

4 Describe the profit/cost centres in your company's cost accounting system. **Response:**

^{*} rather than showing a 'name-plate' optimal capacity it is more meaningful to show the maximum level of production that may reasonably be attained under normal operating conditions. For example assuming: normal levels of maintenance and repair; a number of shifts and hours of operation that is not abnormally high; and a typical production mix.

The company adopt actual cost and there are four cost centers according to the workshop, i.e. acid-pickling workshop, cold-rolling workshop, galvanizing workshop, color coating workshop.

For each profit/cost centre describe in detail the methods that your company normally uses to allocate costs to the goods under consideration. In particular specify how, and over what period, expenses are amortised or depreciated, and how allowances are made for capital expenditures and other development costs.

Response:

The expenditure of production shall be aggregated by production workshop, i.e. acid-pickling workshop, cold-rolling workshop, galvanizing workshop, color coating workshop.

Cost and expense are calculated and assigned to different workshop, so each workshop has its own cost which consist of different items like raw material, direct labour, energy and other items. Depreciation from fixed assets will be amortised into monthly cost evenly according to straight line method. There is no other capital expenditure other than depreciation.

Describe the level of product specificity (models, grades etc) that your company's cost accounting system records production costs.

Response:

The level of product can be specified into thickness and width of the product.

7 List and explain all production costs incurred by your company which are valued differently for cost accounting purposes than for financial accounting purposes.

Response:

Not applicable.

8 State whether your company engaged in any start-up operations in relation to the goods under consideration. Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.

Response:

Not applicable.

9 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.

Response:

Not applicable.

G-4 Cost to make and sell on domestic market

This information is relevant to testing whether domestic sales are in the ordinary course of trade.¹

1 Prepare this information in a spreadsheet named "G4 – Domestic CTMS".

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

Provide this information for each quarter (or month if your company calculates costs on a monthly basis) and over the period of the review.

If you are unable to supply this information in this format, please contact the case officer for this review at the address shown on the cover of this questionnaire.

Please specify unit of currency.

Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

¹ Identify each cost separately. Include indirect material costs as a separate item only if not included in manufacturing overheads.

² Relating to costs of production only; identify each cost separately.

³ Identify each cost separately. Please ensure non-operating expenses that relate to the goods under consideration are included. Where gains/losses due to foreign currency exchange are incurred, please provide detail of the amounts separately for transaction and translation gains/losses.

¹ The Commission applies the tests set out in s.269TAAD of the Customs Act 1901 to determine whether goods are in ordinary course of trade. These provisions reflect the WTO anti-dumping agreement – see Article 2.2.1.

G-5 Cost to make and sell goods under consideration (goods exported to Australia)

The information is relevant to calculating the normal values based on costs. It is also relevant to calculating certain adjustments to the normal value.

Response:

Not applicable since Huada did not export goods to Australia until now. Actually the production costs between domestic sales and expoet sales are the same.

1 Prepare this information in a spreadsheet named **"G5 – Australian CTMS**".

	Quarter X	Quarter X	Quarter X	Quarter X	Review Period
Model/Type exported to Australia – from spreadsheet LIKEGOOD					1 6116 4
Material Costs ¹					
Direct Labour					
Manufacturing Overheads					
Other Costs ²					
Total Cost to Make					
Production Volume					
Unit Cost to Make					
Selling Costs					
Administration Costs					
Financial Costs					
Delivery Expenses ³					
Other Costs ³					
Total SG&A					
Sales Volume					
Unit SG&A					
Unit Cost to Make and Sell					

¹ Identify each cost separately. Include indirect material costs as a separate item only if not included in manufacturing overheads.

² Relating to costs of production only; identify each cost separately.

³ Identify each cost separately. Please ensure non-operating expenses **that relate to the goods** are included. Where gains/losses due to foreign currency exchange are incurred, please provide detail of the amounts separately for transaction and translation gains/losses.

Provide this information for each quarter (or month if your company calculates costs on a monthly basis) and over the period of the review.

If you are unable to supply this information in this format, please contact the case officer for this review at the address shown on the cover of this questionnaire.

Please specify unit of currency.

Response:

Not applicable since Huada did not export goods to Australia until now.

Where there are cost differences between goods sold to the domestic market and those sold for export, give reasons and supporting evidence for these differences.

Response:

Not applicable since Huada did not export goods to Australia until now.

Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.

Response:

Not applicable since Huada did not export goods to Australia until now.

In calculating the unit cost to make and sell, provide an explanation if the allocation method used (eg number, or weight etc) to determine the unit cost differs from the prior practice of your company.

Response:

Not applicable since Huada did not export goods to Australia until now.

G-6 Major raw material costs

List major raw material costs, which individually account for <u>10% or more</u> of the total production cost.

For these major inputs:

- identify materials sourced in-house and from associated entities;
- identify the supplier; and
- show the basis of valuing the major raw materials in the costs of production you have shown for the goods (eg market prices, transfer prices, or actual cost of production).

Where the major input is produced by an associate of your company the Commission will compare your purchase price to a normal market price. If the associate provides information on the cost of production for that input such cost data may also be considered.

Normal market price is taken to be the price normally available in the market (having regard to market size, whether the input is normally purchased at 'spot prices' or under long term contracts etc).

The term associate is defined in section 269TAA of the *Customs Act*. Included in that definition are companies controlled by the same parent company (a company that controls 5% or more of the shares of another is taken to be an associated company); companies controlled by the other company; and companies having the same person in the board of directors.

Important note: If the major input is sourced as part of an integrated production process you should provide detailed information on the full costs of production of that input.

Response:

The major raw material costs material costs which individually account for 10% or more of the total production cost are hot-rolled steel and zinc ingot. The Company purches these raw materials from independent suppliers on market price and the Company value the major raw materials in the costs of production based on actual cost.

G-7 Cost to make and sell goods under consideration (goods exported to third countries)

The information is relevant to calculating the normal values based on costs. It is also relevant to calculating certain adjustments to the normal value.

1 Prepare this information in a spreadsheet named "THIRD COUNTRY CTMS". Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

¹ Identify each cost separately. Include indirect material costs as a separate item only if not included in manufacturing overheads.

² Relating to costs of production only; identify each cost separately.

³ Identify each cost separately. Please ensure non-operating expenses **that relate to the goods** are included. Where gains/losses due to foreign currency exchange are incurred, please provide detail of the amounts separately for transaction and translation gains/losses.

Provide this information for each quarter (or month if your company calculates costs on a monthly basis) and for the review period.

If you are unable to supply this information in this format, please contact the case officer for this review at the address shown on the cover of this questionnaire. Please specify unit of currency.

Where there are cost differences between goods sold to the domestic market and those sold for export, give reasons and supporting evidence for these differences.

Response:

There was no difference.

Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.

Response:

There was no significant defference.

In calculating the unit cost to make and sell, provide an explanation if the allocation method used (eg number, or weight etc) to determine the unit cost differs from the prior practice of your company.

Response:

Not applicable.

SECTION H SUBSIDIES

The countervailing duty notice applying to zinc coated (galvanised) steel covers subsidies under the following subsidy programs:

Program	Program name
No.	
	Hot rolled steel provided by government at less than adequate
1	remuneration
	Preferential Tax Policies for Enterprises with Foreign Investment
	Established in the Coastal Economic Open Areas and Economic
4	and Technological Development Zones
	Preferential Tax Policies for Foreign Invested Enterprises-
	Reduced Tax Rate for Productive Foreign Invested Enterprises
5	scheduled to operate for a period of not less than 10 years
	Preferential Tax Policies for Enterprises with Foreign Investment
	Established in Special Economic Zones (excluding Shanghai
6	Pudong area)
_	Preferential Tax Policies for Enterprises with Foreign Investment
7	Established in Pudong area of Shanghai
8	Preferential Tax Policies in the Western Regions
9	Land Use Tax Deduction
10	Preferential Tax Policies for High and New Technology Enterprises
	Tariff and value-added tax (VAT) Exemptions on Imported
11	Materials and Equipment
	One-time Awards to Enterprises Whose Products Qualify for 'Well-
12	Known Trademarks of China' and 'Famous Brands of China'
40	Matching Funds for International Market Development for Small
13	and Medium Enterprises
14	Superstar Enterprise Grant
15	Research & Development (R&D) Assistance Grant
16	Patent Award of Guangdong Province
17	Innovative Experimental Enterprise Grant
18	Special Support Fund for Non State-Owned Enterprises
19	Venture Investment Fund of Hi-Tech Industry
20	Grants for Encouraging the Establishment of Headquarters and
20	Regional Headquarters with Foreign Investment
24	Grant for key enterprises in equipment manufacturing industry of
21	Zhongshan Water Canadrian Fund Daduction
22	Water Conservancy Fund Deduction
23	Wuxing District Freight Assistance
24	Huzhou City Public Listing Grant
25	Huzhou City Quality Award
26	Huzhou Industry Enterprise Transformation & Upgrade
26	Development Fund
27	Wuxing District Public List Grant

28	Anti-dumping Respondent Assistance
29	Technology Project Assistance
30	Capital injections
31	Environmental protection grant
32	High and New Technology Enterprise Grant
33	Independent Innovation and High-Tech Industrialisation Program
34	VAT refund on domestic sales by local tax authority
35	Environmental Prize
36	Jinzhou District Research and Development Assistance Program

H-1 Preferential income tax programs (Programs 4-10, 34)

Please complete questions 1 to 6 below and fill the "Income Tax Programs" and "Income Tax" spreadsheets in the "Exporter Questionnaire – Attachment" Excel workbook.

Did your business or any company/entity related to your business receive <u>any benefit</u>² under the following income tax programs during the review period (1 July 2017 to 30 June 2018), or any other applicable program:

Program 4: Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and in Economic and Technological Development Zones

Program 5: Preferential Tax Policies for Foreign Invested Enterprises - Reduced Tax Rate for Productive Foreign Invested Enterprises scheduled to operate for a period not less than 10 years

Program 6: Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)

Program 7: Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai

Program 8: Preferential Tax Policies in the Western Regions

Program 9: Land Use Tax Deduction

Program 10: Preferential Tax Policies for High and New Technology Enterprises

Program 34: VAT refund on domestic sales by local tax authority

Response:

The Company had received benefits from Program 10.

² Refer to the Glossary of Terms for a definition of benefit in this context.

- 2. For <u>each program</u> that you have identified above as conferring a benefit on your entity, answer the following.
 - i. Provide complete details of the amount of the benefit received, including whether it was received in total or in instalments.

Response:

The income tax partly exempted was received in total.

ii. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production or only certain products that have undergone research and development).

Response:

All products in the Company.

iii. Describe the application and approval procedures for obtaining a benefit under the program.

Response:

The tax bureau will grant the preferential income tax policy if the company get an certificate of High and New Technology Enterprises.

iv. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China (GOC) in relation to the program.

Response:

Not applicable.

v. Outline the fees charged to or expenses incurred by your business in receiving the program.

Response:

Not applicable.

vi. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.

Response:

Not applicable.

- vii. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.

Response:

It is some part related to the industry the Company belongs.

viii. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.

Response:

Not applicable.

ix. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.

Response:

Not applicable.

x. Indicate where benefits under this program can be found in your accounting system (i.e. specify the ledgers or journals) and financial statements.

Response:

Not applicable.

xi. To your knowledge, does the program still operate or has it been terminated?

If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part H-5 in relation to this program.

Response:

It still operates.

3. It is our understanding that the current general tax rate for enterprises in China is 25%. Confirm whether this is correct and if not, please identify the general tax rate for enterprises in China from 1 July 2017, indicating any changes in the taxation rate over the period 1 July 2017 to 30 June 2018.

Response:

Correctly, the income taxe rate for enterprises in China is 25% from 1 July 2017.

4. If your business currently pays corporate income tax at a rate less than 25% (or whatever the rate of general tax is as discussed above), or paid at a rate less than that during the review period, please indicate whether the reduced rate relates to any of the preferential income tax programs identified in question 1 above.

Response:

Yes, the Company received benefits from Program 10 of preferential income tax, which is 15%.

5. If the income tax rate of less than the general rate does not relate to any of the programs identified above, please provide an explanation for the reduced income tax rate and answer the questions at 2 above in relation to the income tax rate reduction.

Response:

Not applicable. Please the answer of question 1.

6. For each taxation year from 2013 to 2017, complete the "Income Tax" tab in the "Exporter Questionnaire – Attachment" Excel workbook.

Provide a copy (bearing the official stamp of the appropriate level of the GOC) of all:

- corporate income tax acknowledgement form(s) and the income tax return(s) that your company filed for the 2013, 2014, 2015, 2016 and 2017 tax years; and
- income tax instalment payment receipts, and all applicable income tax forms and schedules, for the 2013, 2014, 2015, 2016 and 2017 tax years.

Note: If your company did not file an income tax return in any of the tax years indicated, provide an explanation stating the reasons why you were exempt from filing such a return and the applicable section[s] of the Income Tax Act under which you were exempt from doing so.

Response:

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

H-2 Tariff and VAT exemptions on imported materials and equipment (Program 11)

It is our understanding that certain enterprises in China are eligible for exemption from the payment of import duty and import VAT on imported inputs, technologies and machinery.

If your business or any company/entity related to your business received benefits under any such program during the period 1 July 2017 to 30 June 2018, please answer the following questions.

Response:

Not applicable. The Company did not receive any benefits under these programs.

- 1. Provide complete details involving the amount of the VAT refund received, including whether the refund was received in a lump sum or multiple instalments.
- 2. Describe the application and approval procedures for obtaining a benefit under the program.
- 3. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
- 4. Outline the fees charged to or expenses incurred by your business in receiving the program.
- 5. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
- 6. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
- 7. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
- 8. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.

- 9. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
- 10. Were the materials and/or equipment that were entitled to a refund of VAT used in the production of the goods during the review period? If yes, provide the following information:
 - (a) type of inputs;
 - (b) cost of inputs;
 - (c) quantity of inputs; and
 - (d) amount of VAT refunded.
- 11. Has your company received exemption from payment of or refunds of import duty and import VAT for imported material inputs (e.g. hot rolled coil, coking coal and coke) at any time that were used in the production of the goods during the review period? If yes, provide the following information:
 - (a) description of imported product;
 - (b) country of origin;
 - (c) quantity of imported product;
 - (d) purchase price;
 - (e) terms of purchase (e.g. FOB, CIF);
 - (f) ocean freight;
 - (g) value for duty of imported product;
 - (h) regular rate of taxes and duties;
 - (i) concessionary rate of taxes and duties;
 - (j) amount of duties and taxes normally applicable;
 - (k) amount of duties and taxes paid;
 - (I) amount of duties and taxes exempt;
 - (m) date of importation;
 - (n) tariff classification number;
 - (o) customs entry number; and
 - (p) application fee.
- 12. Explain if (and how) the GOC determines which imported inputs are consumed by your business in the production of the subject goods and in what amounts, and the amount of duty paid or payable on the inputs (including any allowance for waste).
- 13. Explain how the GOC determined the percentage rate of duty exemption.

Please note that goods consumed in the production of exported goods (inputs) include:

- (a) goods incorporated into the exported goods; and
- (b) energy, fuel, oil and catalysts that are used or consumed in the production of the exported goods.

- 14. Provide a representative sample of copies of import entry documents (for example: bill of entry, invoice from supplier, etc.) for each type of importation covering duty-exempt inputs and duty-paid inputs imported for use in the manufacturing of the subject goods.
- 15. In addition to the import entry documents, you must also provide copies, if applicable, of any applications submitted to and/or approval document received from the GOC relating to the exemption from the payment of import duty and import VAT on imported inputs and in relation to the VAT that is refunded on the exportation of the subject goods.
- 16. Provide copies of reports and audits by the GOC authority responsible for administering the duty rebate or duty drawback scheme with respect to the verification of the importation and use of inputs and the remittance or drawback of the related duty paid or payable.
- 17. To your knowledge, does the program still operate or has it been terminated?

If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program.

H-3 Grants (Programs 12-33, 35 and 36)

In the original countervailing investigation (REP 193), it was determined that subsidy benefits under the following countervailable subsidy programs have been received by Chinese exporters of the goods.

Program 12: One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'

Program 13: Matching Funds for International Market Development for small and medium size enterprises (SMEs)

Program 14: Superstar Enterprise Grant

Program 15: R&D Assistance Grant

Program 16: Patent Award of Guangdong Province

Program 17: Innovative Experimental Enterprise Grant

Program 18: Special Support Fund for Non-State-Owned Enterprises

Program 19: Venture Investment Fund of Hi-Tech Industry

Program 20: Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment

Program 21: Grant for Key Enterprises in Equipment Manufacturing Industry of Zhongshan

Program 22: Water Conservancy Fund Deduction

Program 23: Wuxing District Freight Assistance

Program 24: Huzhou City Public Listing Grant

Program 25: Huzhou City Quality Award

Program 26: Huzhou Industry Enterprise Transformation & Upgrade

Development Fund

Program 27: Wuxing District Public List Grant

Program 28: Anti-dumping Respondent Assistance

Program 29: Technology Project Assistance

Program 30: Capital injection

Program 31: Environmental protection grant

Program 32: High and New Technology Enterprise Grant

Program 33: Independent Innovation and High-Tech Industrialisation Program

Program 35: Environmental Prize

Program 36: Jinzhou District Research and Development Assistance Program

For the following questions, please provide responses to questions in the "Grants" spreadsheet in the "Exporter Questionnaire – Attachment" Excel workbook.

1. Did your business or any company/entity related to your business receive any benefit under the above programs during the period 1 July 2017 to 30 June 2018?

Response:

Yes. We received benefits from local government and it can be fallen into Program 13.

Did your business receive benefits under <u>any other</u> grant (including awards, prizes, funds) program during the period 1 July 2017 to 30 June 2018?
 Response:

Yes. We received some other kinds of benefits from local government, such as Patent special fund of Zhejiang Province, Promoting employment fund of Hangzhou Fuyang, Capital market supporting fund, Patent special fund of

Hangzhou City, Patent special fund of Hangzhou Fuyang, Foreign trade development fund of Central government, Open economy subsidy of Hangzhou Fuyang, Industrial internet fund of Hangzhou City.

- 3. For each program identified in your answer to questions 1 and 2 above, answer the following questions:
 - i. Provide complete details involving the amount of the grant received, including whether the grant was received in a lump sum or multiple instalments.
 - ii. Identify the date of approval of the grant and the date the grant was received.
 - iii. Identify the body responsible for administering the grant.
 - iv. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production, or only certain products that have undergone research and development).
 - v. Describe the application and approval procedures for obtaining a benefit under the program.
 - vi. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
 - vii. Outline the fees charged to or expenses incurred by your business in receiving the program.
 - viii. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
 - ix. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports:
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
 - x. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.

- xi. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
- xii. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
- xiii. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
- xiv. To your knowledge, does the program still operate or has it been terminated?
- xv. If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part H-5 in relation to this program.

Response:

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This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

H-4 Hot rolled steel provided by Government at less than adequate remuneration (Program 1)

The countervailing investigation, as outlined in *International Trade Remedies Branch Report No. 193* (REP 193),³ considered claims that public bodies (in the form of SOEs/SIEs) were supplying HRC, coking coal and coke, directly or indirectly, to manufacturers of zinc coated (galvanised) steel at less than fair value.

The term SOE or SIE is defined in the glossary of this questionnaire (Appendix 1).

³ REP 193 investigated galvanised steel and aluminium zinc coated steel exported from China, Korea and Taiwan. Due to the close nature of these products and common interested parties, findings from both countervailing investigations were detailed in the one report.

In relation to this program, provide the following information.

 Did your business or any company/entity related to your business receive any benefit under the above program during the inquiry period 1 July 2017 to 30 June 2018?

Response:

The Company did not receive any benefits under these programs since the Compnay purchase the abovementioned raw materials from independent suppliers on market price from the open market.

2. Does your business purchase coking coal, coal or HRC from SOE/SIEs? **Response:**

The Company purchased HRC from SOE/SIEs.

3. Provide a list, including a contact name and address, of all your suppliers of aluminium. Indicate whether the supplier is a SOE/SIE and whether they supply HRC, coking coal or coal.

Response:

The Company purchased HRC from SOE/SIEs.

4. Provide a listing showing the purchase price of raw material from each supplier during each month of the inquiry period.

Prepare this information in the attached spreadsheet named "Raw Material Purchases" included as part of the *Exporter Questionnaire accompanying spreadsheet* provided alongside this questionnaire (as per Section G-6).

Please add more space for additional suppliers and categories as required. **Response:**

This is highly sensitive commercial information, which cannot be provided in the non-confidential summary. Disclosure of such confidential information could provide the Company's competitors with insights into the Company's commercial strategy, thereby posing a serious threat to the commercial interests of the company. This information has been provided to the Authority in the confidential response.

5. Did your business receive any reduction/reduced price for the purchase of these goods/services during the inquiry period? If so, describe the eligibility criteria that your business had to meet in order to qualify for any reduction in the price paid for the goods/services.

Response:

Not applicable since the Company did not receive such reduction or reduced price.

6. Provide copies of all contractual agreements that detail the obligations of the SOE/SIE and your business with reference to the granting and receipt of the assistance/benefits.

Response:

There is no such contractual agreement.

7. Did your business import any raw material during the inquiry period? If yes, please provide details of all such imports, including date, source, type, amount and price.

Explain the reason/s for your business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc.

Response:

Not applicable since the Company did not import any raw material during the inquiry period.

8. Explain the factors that determine the price of HRC, coking coal and coal.

Response:

The Company did not receive any benefits under these programs since the Compnay purchase the abovementioned raw materials from independent suppliers on market price from the open market.

H-5 Any other programs

Provide answers to the following questions in the "Other programs" spreadsheet in the "Exporter Questionnaire – Attachment" Excel workbook.

Response:

Not applicable. Beside the grants as stated in the part of H-3, the Company did not receive any benefits under these programs.

- 1. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business).
- 2. Are you aware of any programs of the GOC, any of its agencies or any other authorised body, that benefits⁴ manufacturers of aluminium zinc coated steel and galvanised steel that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program).

⁴ Refer to the Glossary of Terms for a definition of benefit in this context.

- 3. Indicate the location of the program by region, province or municipal level.
- 4. Indicate the type of program, for example:
 - a) the provision of grants, awards or prizes;
 - b) the provision of goods or services at a reduced price (e.g. electricity, gas, raw materials (including, for example, zinc), transport);
 - c) the reduction of tax payable including income tax and VAT;
 - d) reduction in land use fees;
 - e) loans from Policy Banks at below-market rates; or
 - f) any other form of assistance.
- 5. For each program that you have identified, answer the following.
 - i. Indicate whether your company benefited from any of the identified programs.
 - ii. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production or only certain products that have undergone research and development).
 - iii. Describe the application and approval procedures for obtaining a benefit under the program.
 - iv. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
 - v. Outline the fees charged to or expenses incurred by your business in receiving the program.
 - vi. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
- vii. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs:
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
 - viii. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
 - ix. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.

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- x. Indicate where benefits under this program can be found in your accounting system (i.e. specify the ledgers or journals) and financial statements.
- xi. To your knowledge, does the program still operate or has it been terminated?
- xii. If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the Questions in Part H-4 in relation to this program.